



DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
100 W. OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401-3604

August 5, 2019

Regulatory Branch
SAS-2011-00707

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-2011-00707

Applicant: Mr. Don Asdell, President
International Auto Processing (IAP)
1 Joe Frank Harris Boulevard
Brunswick, Georgia 31523

Agent: Mr. Brandon Wall
Sligh Environmental Consultants, Inc. (SECI)
31 Park of Commerce Way
Suite 200B
Savannah, Georgia 31405

Location of Proposed Work: The project site is located on the southern portion of Colonel's Island, south of US Highway 17, at the Colonel's Island Terminal, in Glynn County, Georgia (Latitude 31.1128, Longitude -81.5423).

Description of Work Subject to the Jurisdiction of the U.S. Army Corps of Engineers: The applicant is proposing to expand their existing commercial auto processing infrastructure located at Colonel's Island Terminal to provide additional cargo capacity. The expansion would include filling freshwater wetland within a 13.07 acre area within the site for construction of additional parking. As proposed, the project would require permanent impacts to approximately 1.26 acres of freshwater jurisdictional wetlands associated with the addition of 2,000 auto storage spaces. According to the applicant's agent, SECI, these wetlands are low in quality and have been impacted by the surrounding development of the terminal. The applicant's proposed compensatory wetland mitigation plan is the purchase of 4.54 wetland credits from a Corps approved bank within the project's primary service area. Please see the attached drawings provided by the applicant for more detailed information.

BACKGROUND

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 will review the proposed project for water quality certification, in accordance with the provisions of Section 401 of the Clean Water Act. Prior to issuance of a Department of the Army permit for a project location in, on, or adjacent to the waters of the State of Georgia, review for Water Quality Certification is required. A reasonable period of time, which shall not exceed one year, is established under the Clean Water Act for the State to act on a request for Water Quality Certification, after which, issuance of such a Department of the Army permit may proceed.

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 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, Coastal Management Program, 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: In association with a previous permit action that included the project area, a Phase I archeology survey report entitled, "An Archeological Survey and Testing of the Southern Portion of Colonel's Island, Glynn County, Georgia," dated January 23, 2011, was conducted by Southeastern Archeological Services, Inc

for the entire southern portion of Colonel's Island (south of Highway 17). The report recommended 17 sites ineligible for inclusion in the National Register of Historic Places and 2 sites eligible for inclusion in the National Register of Historic Places. By letter dated April 17, 2012, the USACE requested concurrence from the Georgia Department of Natural Resources, Historic Preservation Office (GASHPO) regarding the above eligibility determinations. By letter dated May 15, 2012 the HPD concurred with the findings of the report as well. No changes have occurred within the site boundary since the previous Section 106 review.

Based on the information above, the Corps will reinitiate consultation with the GASHPO and Federally Recognized Tribes.

Essential Fish Habitat (EFH): This notice initiates the EFH consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act. Our initial determination is that the proposed action would not have no effect on EFH or federally managed fisheries in the Atlantic Ocean, due to the fact that no EFH is located in the project area. Our final determination relative to project impacts to EFH and the need for mitigation measures are subject to review by and coordination with the NMFS and the South Atlantic Fisheries Management Council.

Endangered Species: A preliminary review the U.S. Fish and Wildlife Service (FWS) list of Endangered and Threatened Species (IPaC) indicates the following listed species may occur in the project area: West Indian manatee (*Trichechus manatus*), piping plover (*Charadrius melodus*), red knot (*Calidris canutus rufa*), wood stork (*Mycteria americana*), Eastern indigo snake (*Drymarchon corais couperi*), green sea turtle (*Chelonia mydas*), leatherback sea turtle (*Dermochelys coriacea*), loggerhead sea turtle (*Caretta caretta*), Altamaha spiny mussel (*Elliptio spinosa*), and hairy rattlesnake (*Baptisia arachnifera*).

The Corps has determined that the proposed project will have no effect to the West Indian manatee (*Trichechus manatus*), piping plover (*Charadrius melodus*), red knot (*Calidris canutus rufa*), green sea turtle (*Chelonia mydas*), leatherback sea turtle (*Dermochelys coriacea*), loggerhead sea turtle (*Caretta caretta*), Altamaha spiny mussel (*Elliptio spinosa*), and hairy rattlesnake (*Baptisia arachnifera*).

The Corps has determined that the proposed project may affect not likely to adversely affect the wood stork (*Mycteria americana*) and Eastern indigo snake (*Drymarchon corais couperi*). At this time the Corps is requesting concurrence with the above effects determinations from the Services.

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, National Oceanic and

Atmospheric Administration, National Marine Fisheries Service; or, any other interested party, on whether any species listed or proposed for listing may be present in the area.

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 Corps 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 Corps 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 by email to

skye.h.stockel@usace.army.mil. Alternatively, you may submit comments in writing to the Commander, U.S. Army Corps of Engineers, Savannah District, Attention: Ms. Skye H. Stockel, 100 West Oglethorpe Avenue Savannah, Georgia 31401-3604, 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 Ms. Skye H. Stockel, Project Manager, Coastal Section at 912-652-5690.


Enclosures:

1. Vicinity Map- "2017 Aerial Photograph IAP Expansion Site"
2. Wetland Map- "Wetland Exhibit Parcel "A" Being a 13.07 Acre Portion of Lands of the Georgia Ports Authority" (Sheets 1-5)
3. Wetland Impact Map- "Parking Development Colonel's Island Terminal"
4. Project Description
5. Cultural Resource Coordination Letters
6. IPaC
7. Mitigation Worksheets



The wetlands shown on this exhibit have been delineated by SECI but have not been surveyed. The wetland boundaries are approximate and subject to change pending verification from the US Army Corps of Engineers (USACE). SECI recommends no land disturbing activities take place until final USACE verification is received.

 Wetland

 Project Limits

1,000

 Feet

slighenvironmental consultants, inc.
 31 Park of Commerce Way, Suite 200B
 Savannah, Georgia 31405
 phone (912) 232-0451
 fax (912) 232-0453

2017 AERIAL PHOTOGRAPH
 IAP EXPANSION SITE
 GLYNN COUNTY, GEORGIA

Exhibit Date: May 6, 2019

Drawn By: BWW

Reviewed By: JPW

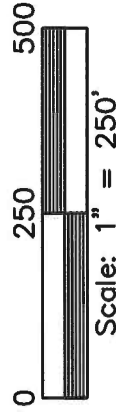
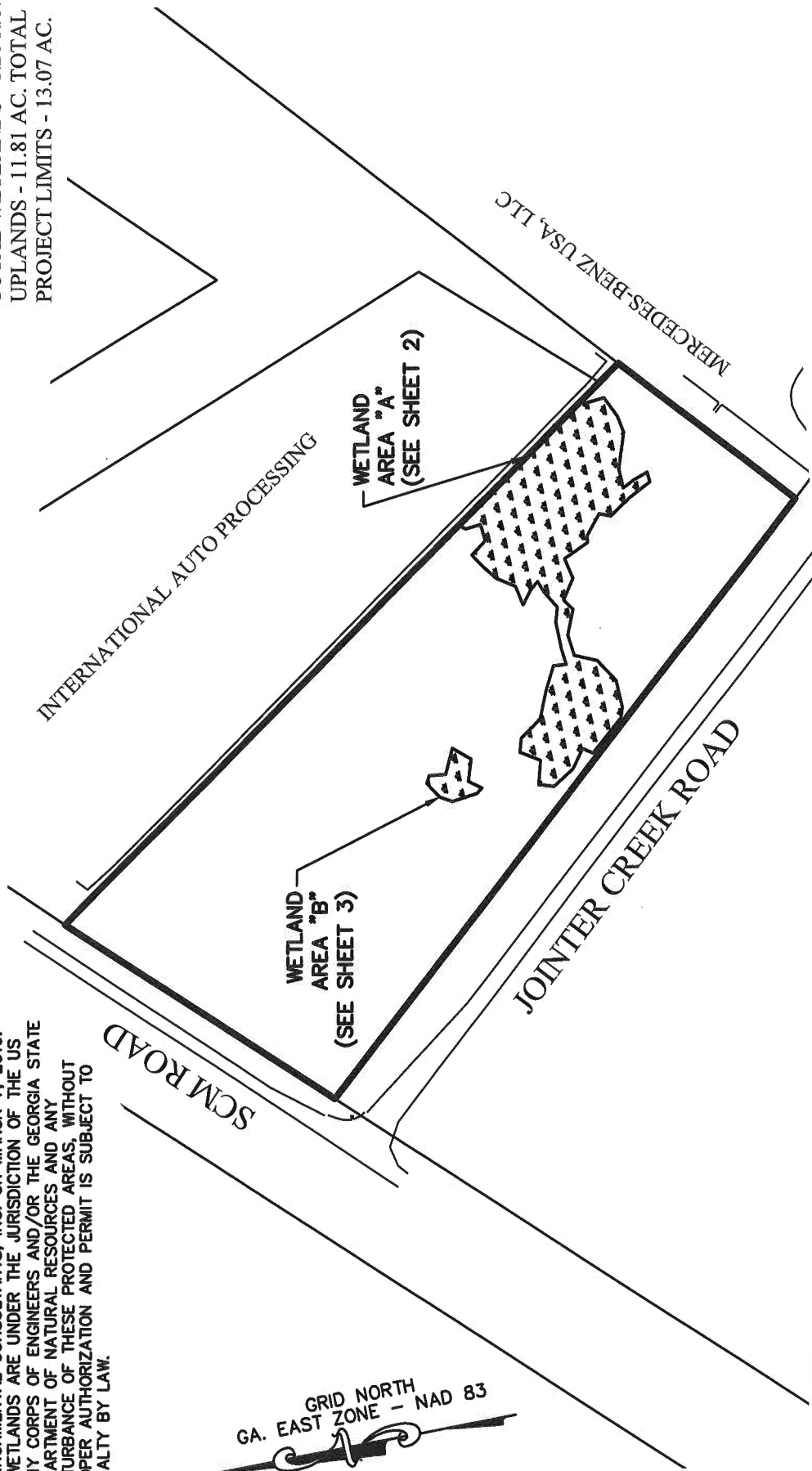
Job Number: 01-19-028

NOTES:
 1. THIS EXHIBIT REPRESENTS A FIELD LOCATION SURVEY OF WETLANDS DELINEATED AND FLAGGED BY SLIGH ENVIRONMENTAL CONSULTANTS, INC. ON MARCH 7, 2019.
 2. WETLANDS ARE UNDER THE JURISDICTION OF THE US ARMY CORPS OF ENGINEERS AND/OR THE GEORGIA STATE DEPARTMENT OF NATURAL RESOURCES AND ANY DISTURBANCE OF THESE PROTECTED AREAS, WITHOUT PROPER AUTHORIZATION AND PERMIT IS SUBJECT TO PENALTY BY LAW.

GRID NORTH
 GA. EAST ZONE - NAD 83

PROJECT LIMITS
 WETLANDS

WETLAND A - 1.17 AC.
 WETLAND B - 0.09 AC.
 TOTAL WETLANDS - 1.26 AC.
 UPLANDS - 11.81 AC. TOTAL
 PROJECT LIMITS - 13.07 AC.



WETLAND EXHIBIT

PARCEL "A", BEING A 13.07 ACRE PORTION OF LANDS OF THE GEORGIA PORTS AUTHORITY, COLONELS ISLAND, 27TH G.M. DISTRICT, GLYNN COUNTY, GEORGIA.

For: THE GEORGIA PORTS AUTHORITY

PLAT DATE: APRIL 1, 2019 FIELD SURVEY DATE: MARCH 7, 2019
 SHEET 1 OF 5

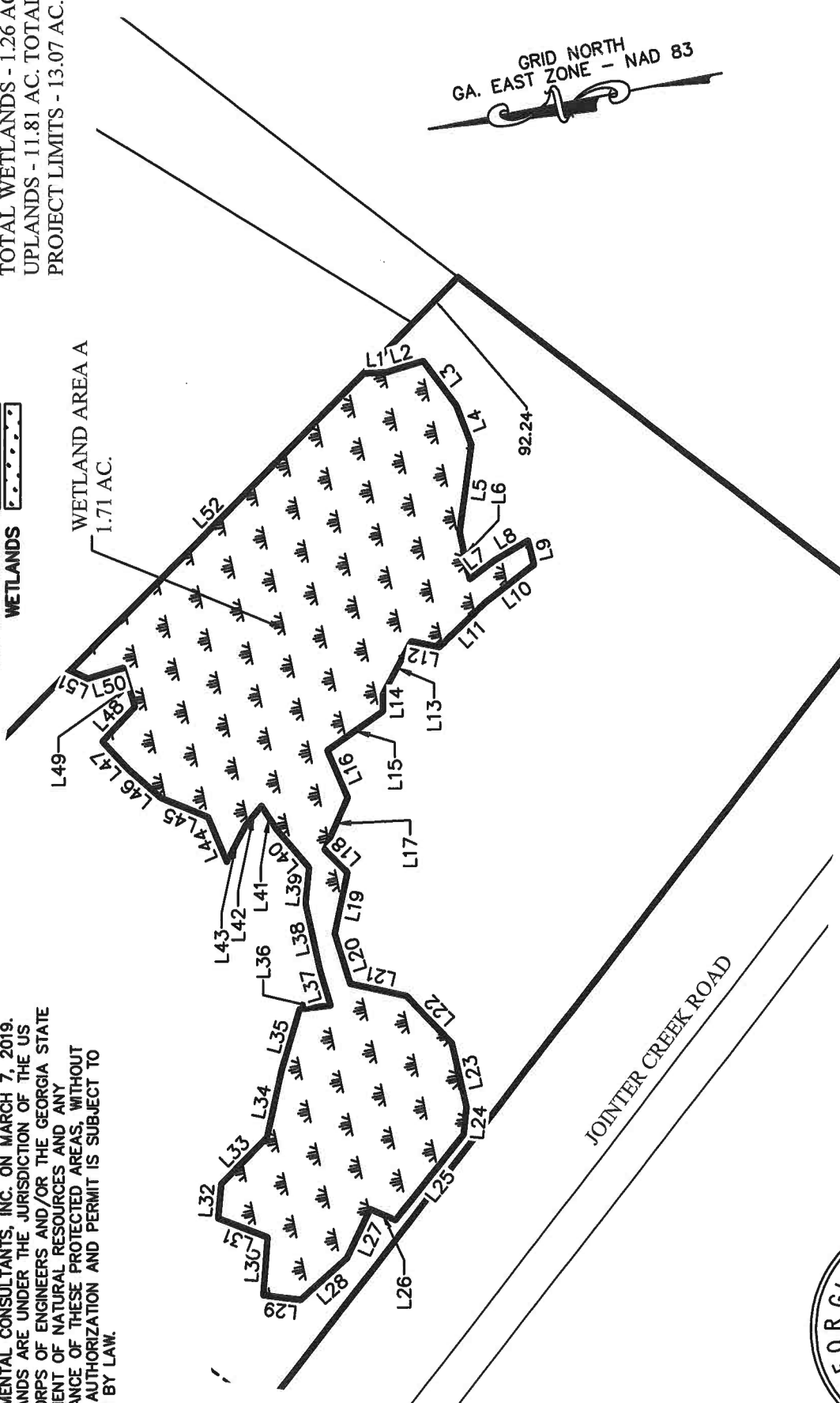
HUSSEY GAY BELL
 329 COMMERCIAL DRIVE, SAVANNAH, GA

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WETLAND A - 1.17 AC.
 WETLAND B - 0.09 AC.
 TOTAL WETLANDS - 1.26 AC.
 UPLANDS - 11.81 AC. TOTAL
 PROJECT LIMITS - 13.07 AC.

PROJECT LIMITS
 WETLANDS

WETLAND AREA A
 1.71 AC.



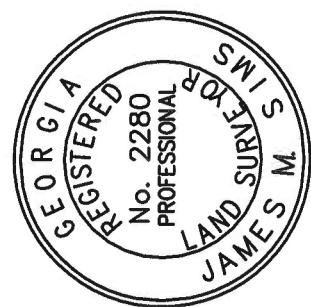
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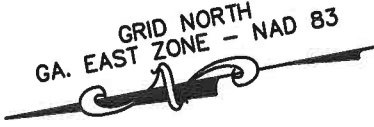
For: THE GEORGIA PORTS AUTHORITY

PLAT DATE: APRIL 1, 2019 FIELD SURVEY DATE: MARCH 7, 2019
 SHEET 2 OF 5

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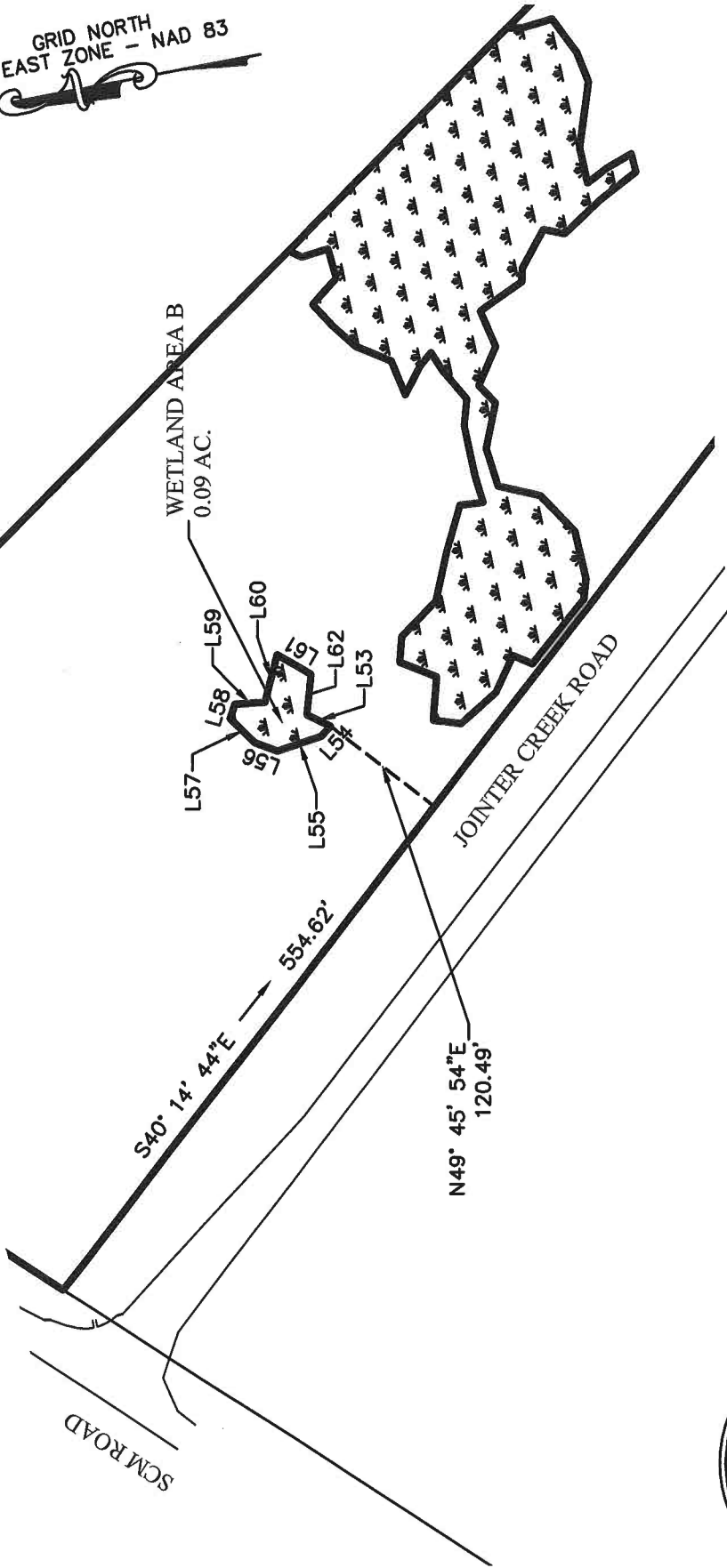
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PROJECT LIMITS
WETLANDS



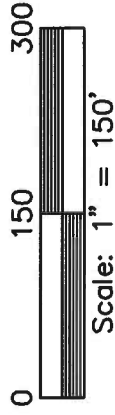
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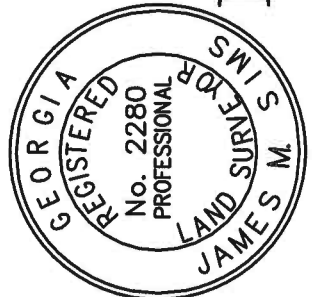
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For: THE GEORGIA PORTS AUTHORITY
 PLAT DATE: APRIL 1, 2019 FIELD SURVEY DATE: MARCH 7, 2019
 SHEET 3 OF 5



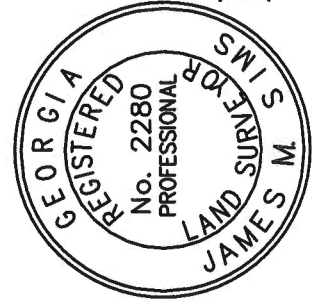
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 329 COMMERCIAL DRIVE, SAVANNAH, GA



LINE TABLE		
LINE NO.	DIRECTION	LENGTH
L1	S9°02'02"W	16.04'
L2	S4°23'40"E	26.31'
L3	S65°41'24"W	37.71'
L4	S81°16'41"W	28.81'
L5	N70°21'22"W	60.21'
L6	N89°54'54"W	33.07'
L7	S24°24'09"E	22.53'
L8	S18°04'20"E	25.73'
L9	S88°15'21"W	17.05'
L10	N25°17'07"W	43.37'
L11	N32°05'31"W	42.59'
L12	N23°48'17"E	19.71'
L13	N49°22'53"W	41.14'
L14	N78°59'40"W	11.45'
L15	N22°55'42"W	46.51'

LINE TABLE		
LINE NO.	DIRECTION	LENGTH
L16	S78°43'58"W	35.20'
L17	N54°05'02"W	38.85'
L18	S57°15'39"W	22.08'
L19	N66°03'44"W	42.79'
L20	S84°35'51"W	35.93'
L21	S24°43'36"W	39.26'
L22	S58°25'16"W	45.33'
L23	S89°15'25"W	44.34'
L24	N71°58'37"W	19.09'
L25	N39°24'27"W	74.42'
L26	N35°25'16"E	19.11'
L27	N52°50'09"W	37.04'
L28	N29°41'14"W	42.52'
L29	N19°02'39"E	25.84'
L30	S73°28'37"E	39.90'

LINE TABLE		
LINE NO.	DIRECTION	LENGTH
L31	N33°16'59"E	36.69'
L32	S73°11'21"E	23.56'
L33	S33°05'32"E	44.87'
L34	S65°34'48"E	46.34'
L35	S61°34'59"E	43.87'
L36	S5°02'12"W	21.38'
L37	N85°17'53"E	25.81'
L38	N89°50'42"E	46.21'
L39	S72°09'55"E	24.57'
L40	N61°30'50"E	34.19'
L41	N69°12'02"E	19.46'
L42	N37°52'56"W	16.55'
L43	N50°13'52"W	28.65'
L44	N79°14'04"E	32.98'
L45	N34°41'55"E	35.11'



HUSSEY GAY BELL
 329 COMMERCIAL DRIVE, SAVANNAH, GA

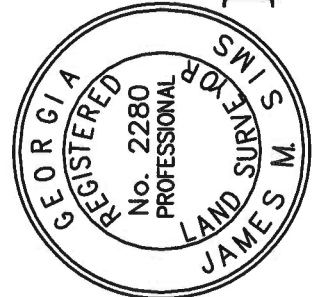
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For: THE GEORGIA PORTS AUTHORITY
 PLAT DATE: APRIL 1, 2019 FIELD SURVEY DATE: MARCH 7, 2019
 SHEET 4 OF 5

LINE TABLE		
LINE NO.	DIRECTION	LENGTH
L46	N53°28'11"E	29.23'
L47	N59°51'32"E	26.11'
L48	S35°27'35"E	32.06'
L49	N85°45'27"E	27.70'
L50	N4°26'25"W	24.99'
L51	N36°22'29"E	13.53'
L52	S33°03'31"E	284.98'
L53	S38°05'38"W	24.28'
L54	N35°27'32"W	12.49'
L55	N6°03'31"W	42.69'
L56	N33°04'00"E	21.67'
L57	N57°22'39"E	31.32'
L58	S60°42'07"E	13.71'
L59	S8°22'04"W	27.18'
L60	S63°26'10"E	44.45'

LINE TABLE		
LINE NO.	DIRECTION	LENGTH
L61	S41°59'47"W	35.83'
L62	N71°52'53"W	37.10'



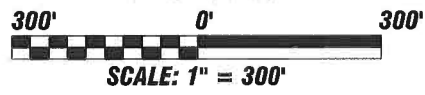
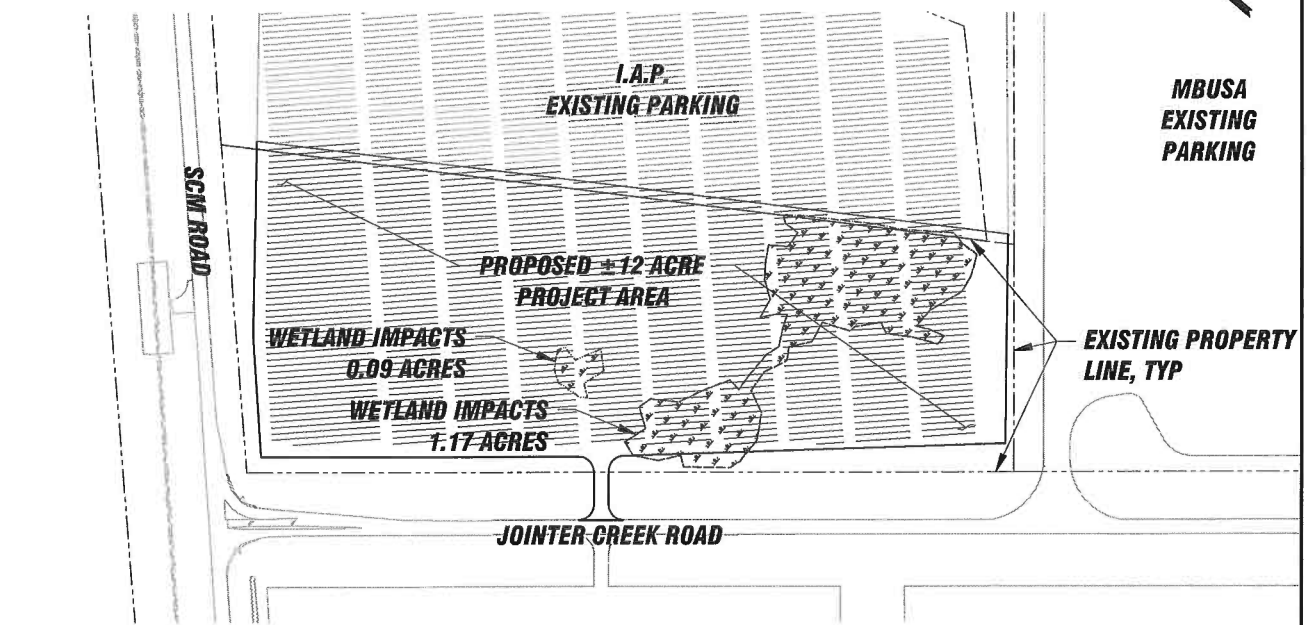
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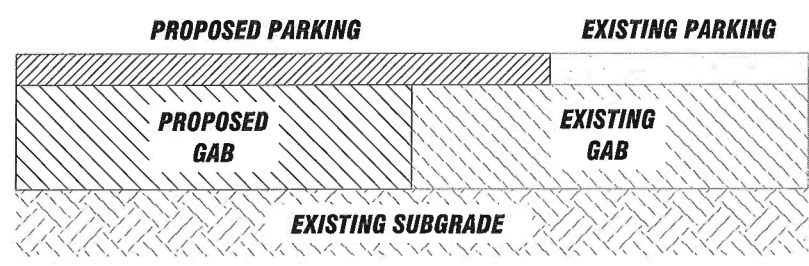
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PLAT DATE: APRIL 1, 2019 FIELD SURVEY DATE: MARCH 7, 2019
 SHEET 5 OF 5



PLAN VIEW



TYPICAL TIE IN SECTION

PROPOSED ACTIVITY: ROAD CONSTRUCTION AND PARKING LOT
 DATUM: NAVD 88
 ADJACENT PROPERTY OWNERS: N/A

WETLAND IMPACTS
 INTERNATIONAL AUTO PROCESSING
 COLONEL'S ISLAND TERMINAL
 BRUNSWICK, GEORGIA 31521

**PARKING DEVELOPMENT
 COLONEL'S ISLAND TERMINAL**
 COUNTY OF: GLYNN STATE: GEORGIA
 APPLICATION BY: INTERNATIONAL AUTO PROCESSING, INC.
 SHEET 1 OF 1 DATE: APRIL 18, 2019

**Project Description and Supporting Documentation
International Auto Processing Expansion
Glynn County, Georgia**

I. Introduction:

International Auto Processing (IAP or applicant) is proposing to expand their existing auto processing parcel at the Colonel's Island Terminal (CIT). The project will provide additional cargo capacity which will improve operations and efficiency at the existing facility and will accommodate future growth in automotive cargo. The project site is located south of US Highway 17, approximately 2.4 miles east of I-95, south of Brunswick, Glynn County, Georgia. The project site is entirely located within the Cumberland-St. Simons Watershed (HUC 03060203).

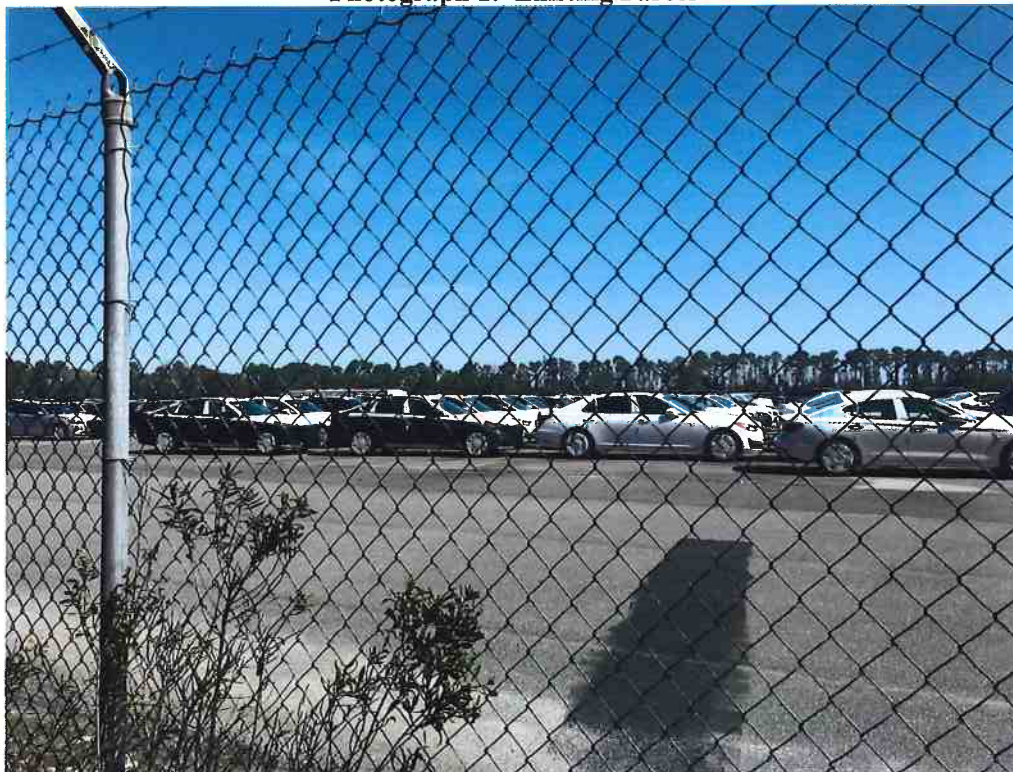
II. Existing Site Conditions:

The applicant currently owns 42.5 acres of existing development on the southside of Highway 17. The proposed expansion site is located south of and adjacent to the existing facility. It is a 13 acre parcel of wooded land completely surrounded by existing paved auto processing yards. As such, the property is totally isolated from an ecological and hydrological standpoint. The surrounding land has been developed over the last decade with a recent uptick in development associated with Georgia Ports Authority's (GPA) CIT Southside expansion project. The proposed expansion area was not included in that project because the applicant had a verbal agreement with the GPA to purchase the site when the need arose. The majority of the expansion site is composed of upland pine forest, and the wetland is depressional hardwood forest. The existing parcel contains a processing building and paved storage spaces.

a. Existing Parcel:

The existing 42.5 acre parcel contains an office/processing center, stormwater ponds, and paved storage space. The applicant is proposing to extend this storage space to the south onto the proposed expansion site.

Photograph 1: Existing Parcel



b. Upland Pine Forest:

11.81 acres of the 13.07 acre site (90%) consists of upland pine forest commonly found throughout the Lower Coastal Plain ecoregion. The overstory is dominated by slash pine (*Pinus elliottii*), and the understory contains slash pine, red bay (*Persea borbonia*), live oak (*Quercus virginiana*), water oak (*Quercus nigra*), sweetgum (*Liquidambar styraciflua*), dense saw palmetto (*Serenoa repens*), fetterbush (*Lyonia lucida*), and gallberry (*Ilex glabra*). This habitat is very dense and is not suitable to support any protected species.

Photograph 2: Upland Pine Forest



c. Forested Wetland:

The two wetlands on the site consist of isolated depressional pockets. These wetlands have always been isolated, but have been severed completely from any other wetlands or waters of the U.S. in the area. Also, they serve no significant biological or ecological function to the overall watershed, and instead just provide localized benefits to the environment. Vegetation varies from young slash pine to swamp tupelo (*Nyssa biflora*) and red bay. Other species include sweetgum, red maple (*Acer rubrum*), false willow (*Baccharis halimifolia*), and wax myrtle with sedges (*Carex spp.*), woolgrass (*Scirpus cyperinus*), plumegrass (*Erianthus giganteus*), and soft rush (*Juncus effusus*) located near the existing pavement to the north where stormwater sheetflow into the wetland is greater. Overall, this habitat is very low in quality due to the affected hydrology and vegetation and the isolation from other natural habitats.

Photograph 3: Depressional Hardwood Wetland



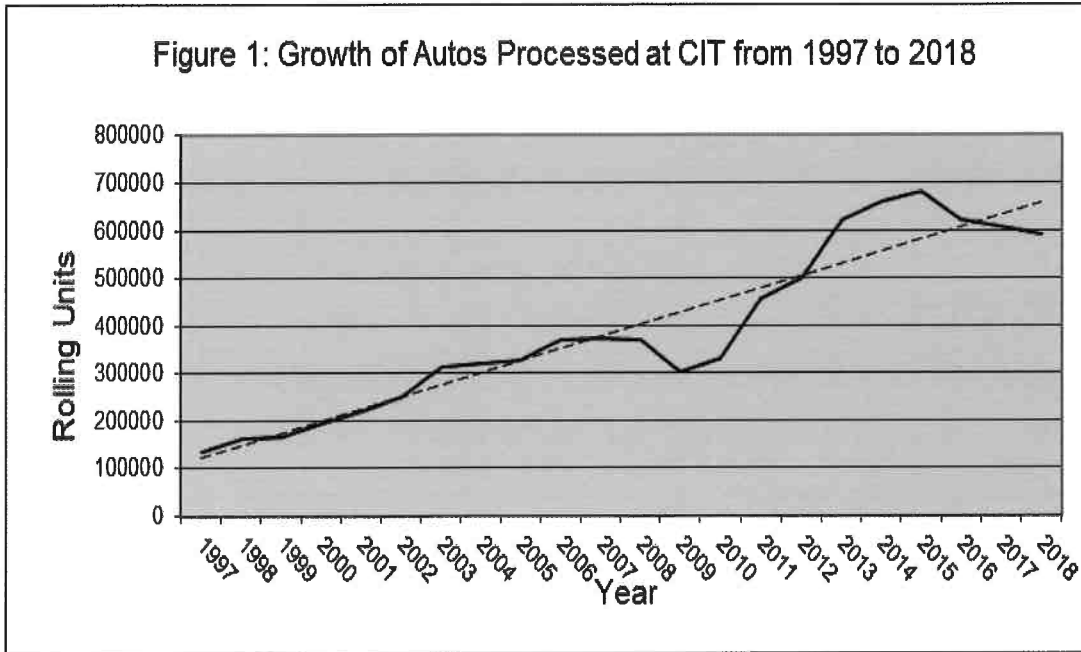
III. Description of Existing Operations:

Autos arrive at the CIT by vessel and are unloaded across the berths where they are driven directly off of the ships the designated processing center. Accessory operations start with the vehicles being driven from a staging area through a car wash and into the facility. Once washed, they are parked in dust free detailing areas. Painting operations, if required, precede final detailing operations. Once the accessory modifications have been completed, the automobiles are driven back to a paved storage area for eventual load-out to dealer and distribution delivery trucks or to trains. Automotive processing centers have specific criteria to be efficient in getting vehicles from the terminal to the dealership and ultimately the consumer. In addition to paved storage areas, processing centers typically contain a 25,000 to 100,000 square foot building where various accessories may be installed on the automobiles. The center will include accessory installation areas, office space, conference rooms, restrooms, mechanical room and utilities, cafeteria area, warehouse storage, and a car wash. Supporting the accessory installation areas are paint booths for detailing, inspection lines, a body shop, mechanical repair areas, and multiple automotive lifts.

IV. Project Need:

Automotive import/export volumes at the CIT have grown steadily over the last several decades. Generally, this growth is driven by a number of key factors including market environment factors and induced demand factors. Shifting population centers from Northeast regions to Southeast regions have spurred above-average population growth in the Southeast, and manufacturers are moving their plants here to take advantage of lower labor and land costs, better logistics, lower energy costs, inexpensive or free land, state incentives, and lower taxes. These shifting market factors create large export opportunities for the applicant at CIT, and the cargo that IAP processes through CIT has the ability to serve approximately 45% of the country's population. All of this coupled with the growing per-capita vehicle ownership to meet transportation requirements points toward overall business growth for the applicant. This growth trend is forecasted to continue thereby requiring the need for additional auto processing space on-terminal.

The overall automotive throughput at CIT for all processors, including the applicant, has grown at an average growth rate of over 7% per year over the last two decades. Since 1997, the throughput of all autos at the terminal has increased from 136,159 rolling units to over 590,000 units in 2018. The below table illustrates the continual growth in automotive throughput at the terminal over the last 21 years.



Of the 590,000 units that were processed last year, IAP handled nearly 400,000 representing two-thirds of all the throughput at the terminal. In fact, since they started operating at CIT, the applicant has processed over 6.3 million autos. IAP's main processing operations are located on several large contiguous parcels on the northside of the island near the berths, but as volumes grow, expansion onto the southside of the terminal has become necessary. On the fully developed north side, the applicant leases approximately 140 acres from the GPA. On the south side of the terminal, the applicant owns 42.5 acres which are fully developed and has already leased several additional parcels from the GPA to satisfy a need to increase on-terminal storage and processing capacity. During high volume periods around the peak shipping season, however, or during longer wait times, congestion can still occur throughout the IAP processing centers on-terminal. This effect will be further exacerbated as volume growth continues. To provide relief for cargo congestion and to improve operational efficiency, the applicant is proposing to expand their existing south side holdings by developing the abutting 13.07 acre parcel.

V. Project Purpose:

According to the Section 404(b)(1) Guidelines of the Clean Water Act, the U.S Army Corps of Engineers must define the basic and overall purpose of the project. The basic purpose must be known to determine if a project is water dependent. The basic purpose for the proposed project is to increase automotive storage capacity which is not a water dependent activity. The overall project purpose is used to evaluate practicable alternatives under the Section 404(b)(1) Guidelines. The overall project purpose is to increase automotive storage capacity by expanding IAP's existing CIT Southside processing facility.

VI. Site Plan:

The site plan for the proposed project includes simply expanding the existing auto storage area on IAP's property westward onto the 13.07 acre expansion site. The ten existing rows of parking will be extended westward providing an estimated 2,000 additional auto storage spaces. Two small isolated depressional wetland pockets will be impacted by the project totaling 1.26 acres. These wetlands are low in quality and have been affected by the surrounding development of the terminal.

VII. Alternatives Analysis:

The Section 404 (b)(1) Guidelines provide that the discharge of dredged or fill material into waters of the United States will not be permitted “if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences.” 40 C.F.R. (230.10(a)). The guidelines further provide that “[a]n alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.” Considering factors such as site location, availability, site access, wetland area, and a variety of economic concerns, the applicant evaluated a number of different alternatives prior to deciding on a final site plan.

a. Alternatives Sites Evaluation:

The project consists of expansion of the applicant's existing facility. The proposed project will take the parcel from 42.5 developed acres to 55.5 developed acres. Construction of an entirely new 55.5 acre facility would likely have higher environmental impacts than the preferred alternative. Improvement to the existing facility is the most feasible alternative. However, prior to deciding on the preferred on-site alternative, the applicant evaluated several alternatives to the project.

1. Off Site Parcel Development

There are several procedural, logistical, and financial factors that prohibit the applicant from developing additional acreage for auto processing off of the existing terminal (e.g. further inland). Cars are received at CIT by ships, so proximity to a ship berthing location is vital to the success of the operation. In order for the autos to be processed at an off-site location, they would either have to be transported by truck or driven individually to the alternative site. Trucking the cars off-site means they would have to be driven directly from the ship to an awaiting truck. The time to unload a ship in this manner would increase from +/-10 hours to several days. Loading the cars directly onto trucks would result in over 200 truck loads for a single ship plus the cost associated with double handling each vehicle.

The other option would be to individually drive the autos to the site, but this too is not feasible for many reasons. First, when the autos are received at the terminal, they are not “road ready” and are not licensed to travel on a public roadway. They also come with governors which restrict speed and RPM's to protect the value of the car. In order to travel on a public roadway, these governors would have to be removed and the cars would have to be licensed. Secondly, the liability of taking the cars on a public highway is extremely high. Adding thousands of vehicles on the road system at one time will increase the potential for accidents and/or disrupt existing traffic patterns. It will also diminish the value of the car by placing road mileage on it, and the potential for an accident or other damage from road debris is high. For all of the above-described reasons, development of an off-site parcel is not feasible for this project.

2. Other CIT Locations

The other alternative to the proposed expansion project is to develop an entirely new auto processing parcel at CIT. As mentioned above, IAP currently owns the 42.5 acres south of SCM Road and leases additional parcels from the GPA. This places all of their existing southside holdings in one location. Initial development of their parcel started in the late 1980's with additional expansion and improvements made between 2009 and 2011. Currently, there are permitted parcels on the southside of Colonel's Island owned by the GPA, but each parcel totals a minimum of 50 acres. At this time, the applicant is not able to commit to such a large operational expansion to satisfy the existing need for additional storage space. The purpose of the project is to improve their existing processing center at the corner of SCM Road and Jointer Creek Road to alleviate congestion during peak shipping seasons or during longer wait times. This existing parcel already contains an office/processing center where ancillary car processing operations take place. This office can service IAP's

operations on the southside since they are all grouped together. It is much more efficient for a processor when all of their storage and processing parcels can be kept together. With the proposed expansion project, IAP will retain all of their cargo processing operations in the same area on CIT southside which can use the same processing building and security protocols. This expansion will add more capacity at the existing processing center allowing more cars to be accommodated and also providing an operational cushion during high occupancy levels. All of this results in more efficient and cost-effective operations and a higher level of security, all of which benefit the applicant. Developing an entirely new parcel/processing center would result in much higher development costs, a lower level of security, and more inefficient operations as opposed to the proposed expansion and would not satisfy the overall project purpose.

3. Other Expansion Options

The applicant evaluated expanding their operations in different directions, but the preferred site is the only viable option. Eastward expansion is very limited and would impact their existing storm ponds and Highway 17. Southward expansion would encroach upon land owned and operated by Mercedes-Benz USA. Northward expansion is also not feasible because of the presence of SCM Road. The applicant even evaluated expanding its holdings at Parcel J and K on the north side of SCM Road, but this would encroach into the marsh buffer that was set aside as an avoidance/minimization measure for the previous 404 permit action. No other feasible expansion alternative exists. Westward expansion onto the project site is the only feasible alternative.

b. On-Site Alternatives:

With the project site chosen and the objective defined, the applicant evaluated on-site alternatives.

1. Total Avoidance

The applicant made every effort to avoid all jurisdictional impacts in the project area, but this is not feasible. Avoiding all wetland impacts would reduce the storage capacity of the expansion area by 50% and would make the southern half of the property unusable. Temporal avoidance of on-site wetlands has been provided over the years by not expanding onto the site until the need, as dictated by cargo throughput increases, was manifested. Now, as rolled cargo continues to grow for the applicant at CIT, the need to improve efficiency at the parcel, lower costs, and increase storage capacity is high.

2. Alternative 1:

Alternative 1 consisted of avoiding approximately 0.4 acre of wetland adjacent to Jointer Creek Road. This alternative required approximately 0.86 acre of wetland impact and reduced the storage capacity increase by approximately 130 units as compared to the preferred alternative. This alternative impacted the majority of the 1.17 acre wetland on site and only left a small pocket near Jointer Creek Road. This wetland would become further ecologically isolated with no surrounding natural upland buffer. It would also have to be cleared, and vertical vegetation growth would have to be maintained so as not to interfere with the adjacent auto storage areas (e.g. the applicant would have to remove the overstory so trees/limbs would not fall on the cars). The avoidance of such a small isolated area offers no environmental benefit to the watershed. The wetland would be degraded to such an extent that mitigating it through wetland credit purchase is the environmentally preferable alternative and provides more benefit to the watershed. For this reason, the applicant chose the preferred alternative.

3. Preferred Alternative:

The preferred site plan is very simple. It will extend the applicant's existing parking rows onto the project site from their existing facility increasing the storage capacity of the parcel

by approximately 2,000 cars. The applicant evaluated avoiding the wetlands within the project area, but the small parcel size along with the isolated nature of the wetlands and surrounding terminal land use drove the decision to develop the whole parcel. The preferred site plan maximizes the site's cargo storage potential and will mitigate the effects to wetlands, which in context of the existing site conditions and surrounding land use, was determined to be the environmentally preferable alternative.

VIII. Impact Avoidance & Minimization Measures:

Section 404(b)(1) mandates that once aquatic impacts on the proposed project site have been avoided to the maximum extent practicable, measures should be taken to minimize the effects of the remaining unavoidable impact. In order to minimize the effects of the proposed discharge on off-site wetlands, all development activities will be performed using best management practices (silt fencing, grassed slopes, etc.). Furthermore, all discharge material will be clean material obtained from an upland source. It is anticipated that these measures will minimize the effect of the project on avoided wetlands.

IX. Threatened and Endangered Species:

SECI completed a threatened and endangered species survey within the project area where plant communities and habitats were observed and noted to determine if they match the habitat types where the listed species have potential to occur. Upland habitats consist of dense pine forest and wetlands are depressional hardwood pockets that receive stormwater from adjacent paved terminal areas. The habitats on-site are low in quality and common throughout Glynn County and the Georgia Coastal Plain region and are not suitable to support any of listed species. In regards to impacts to aquatic species in Glynn County, the project would not result in any waterside activities that could affect sturgeon, manatees, or whales. With respect to nesting sea turtles, the project area is minimal in size and will utilize the approved lighting fixtures and standards outlined in the CIT Light Management Plan. This includes low intensity, fully shielded, downward directional LED lighting. It was therefore concluded that the proposed project will not impact any individual or population of a listed threatened or endangered species. A copy of the U.S. Fish and Wildlife Service Information, Planning, and Conservation System printout for the project is attached.

X. Cultural Resources:

A Phase I archeology survey of the entire southern portion of Colonel's Island (south of Highway 17) was conducted by Southeastern Archeological Services, Inc. in 2011. This included all lands owned by the GPA including the project site even though IAP had a verbal agreement with the GPA to purchase this area. The survey conducted archeological testing on the project site and found no archeological or historical resources. Excerpts from this survey including the cover page, Management Summary, and a shovel-test location map are attached. The USACE agreed with the findings of the report and transmitted it to the Historic Preservation Division (HPD) on April 17, 2012 (attached). By letter dated May 15, 2012 the HPD concurred with the findings of the report as well (attached). No changes have occurred within the site boundary since the Section 106 approval that would require any further investigation or would negate the previous findings. Therefore, development of the proposed project will have no effect on cultural resources.

XI. Mitigation Plan:

As indicated on the attached mitigation credit worksheets, 4.54 wetland mitigation credits are required to offset the proposed wetland impacts. The applicant is proposing to purchase the required mitigation credits from a mitigation bank within the project's primary service area which includes either Broxton Rocks or Wilkinson Oconee Mitigation Bank. Upon approval of the proposed project and prior to initiation of wetland impacts, the applicant will purchase the 4.54 mitigation credits and provide the USACE with a proper receipt.

XII. Conclusion:

In conclusion, IAP is proposing to expand their existing automotive processing center on the south side of Colonels Island, Glynn County, Georgia which requires 1.26 acre of isolated depressional wetland impact. As mitigation, the applicant will purchase 4.54 credits from a mitigation bank which services the project area. The project will not affect protected species, essential fish habitat, cultural resources, or tidal waters. All work will be performed to minimize effects to downstream waterbodies, but the closest wetland is over 2,000 feet

away. The applicant has performed a 404(b)(1) analysis where alternative sites and alternative site plans were evaluated. The applicant has demonstrated that the preferred site plan is the least environmentally damaging practicable alternative.



HISTORIC PRESERVATION DIVISION

MARK WILLIAMS
COMMISSIONER

DR. DAVID CRASS
DIVISION DIRECTOR

May 15, 2012

Kimberly Garvey
Chief, Permits Section, Coastal Branch
Department of the Army
Savannah District, Corps of Engineers
100 West Oglethorpe Avenue
Savannah, Georgia 31401
Attn: Sarah Wise

**RE: SAS-2011-00707: Expand Southern Portion of Colonel's Island Terminal, US 17
Glynn County, Georgia
HP-120426-001**

Dear Ms. Garvey:

The Historic Preservation Division (HPD) has reviewed the survey report *An Archeological Survey and Testing of the Southern Portion of Colonels Island, Glynn County, Georgia* dated January 23, 2011 and prepared by Southeastern Archeological Services, Inc. Our comments are offered to assist the US Army Corps of Engineers (USACE) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act (NHPA).

Based on the information contained in the report and USACE comments, HPD concurs that archaeological sites 9GN180, 9GN287, 9GN189, 9GN190, 9GN191, 9GN192, 9GN357, 9GN359, 9GN360, 9GN361, 9GN362, 9GN363, 9GN364, 9GN365, 9GN366, 9GN367, and 9GN368 are not eligible for listing in the National Register of Historic Places (NRHP). Additionally, HPD concurs with the finding that sites 9GN61, 9GN62, 9GN193, 9GN63, 9GN82, 9GN186, 9GN194, 9GN195 and 9GN368 will require additional testing to evaluate NRHP eligibility. Finally, HPD concurs with the finding that sites 9GN173 and 9GN193 are NRHP-eligible.

HPD offers one comment on the documentation. The report is well written and the integration of previous studies in the project area is excellent and would serve well as a model for other researchers in Georgia archaeology.

Please submit one electronic copy of the report to HPD. Please ensure the electronic copy is an optical character enabled .pdf. For your information, the electronic file will be sent to the Georgia Archaeological Site File at the University of Georgia, Athens for permanent retention.

Please refer to project number **HP-120426-001** in any future correspondence concerning this project. If we may be of further assistance, please do not hesitate to contact Bob Entorf, Review Archaeologist, at (404) 651-6775, or Elizabeth Shirk, Environmental Review Coordinator, at (404) 651-6624.

Sincerely,

Karen Anderson-Cordova, Program Manager
Environmental Review & Preservation Planning

KAC:ebp

cc: Dave Crampton, USACE
Chad Braley, Southeastern Archeological Services, searcher@aol.com

Attachment D



REPLY TO
ATTENTION OF:

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

APRIL 17 2012

Regulatory Division
SAS-2011-00707

Dr. David Crass, Director and Deputy, State Historic Preservation Office
Historic Preservation Division
Georgia Department of Natural Resources
254 Washington Street, Southwest
Ground Level
Atlanta, Georgia 30334

Dear Dr. Crass:

I refer to Department of the Army Permit Application No. SAS-2011-00707 concerning the proposed expansion of the Georgia Ports Authority's Colonels Island Facilities, Brunswick, Glynn County, Georgia. I also refer to the report entitled "An Archaeological Survey and Testing of the Southern Portion of Colonels Island, Glynn County, Georgia." The report is dated January 23, 2011. It was prepared by Southeastern Archeological Services, Inc., for the Georgia Ports Authority and CH2MHill/Lockwood Greene. The proposed undertaking requires a Section 404 permit authorization from the Savannah District, US Army Corps of Engineers (USACE). The work was performed to identify and evaluate archaeological and historic resources within the approximately 700-acre survey tract, in order to take into consideration the undertaking's effects to historic properties in the USACE processing and issuance of permits under its jurisdiction, and pursuant to Section 106 of the National Historic Preservation Act (NHPA).

We are enclosing the subject report for your review and comment. We especially request your comments regarding the sufficiency of the scope of the report, the adequacy of the survey efforts, and the National Register eligibility status (i.e. ineligible, eligible, or need for additional testing) of the site(s) identified in the report.

We have reviewed the report and it is our opinion that the scope of the survey (the Area of Potential Effect) is adequate and that the survey methods and testing methods were adequate and sufficient for the identification of historic properties as defined by 36 CFR 800.16 and 36 CFR 60.4. The detailed technical review comments and recommendations of our Regulatory staff archaeologist concerning the report are attached for your information and consideration.

There are no buildings or other built structures over 50 years of age within the proposed Area of Potential Effect; hence the Section 106 survey includes a survey only of archaeological sites. The survey identified 27 (initially, it was 28 but two small sites were later combined into one larger site) prehistoric and/or historic archaeological sites within the proposed undertaking's Area of Potential Effect.

Several of the sites identified had been discovered, recorded and reported in earlier surveys in 1976 and 1978. Enclosed is a copy of Table 1 from the report's "Management Summary" listing the sites identified, a description of each, their approximate estimated size (area), a general description of each, and the archaeological consultant's recommendation regarding the National Register eligibility status of each.

The archaeological consultant, Southeastern Archaeological Services, Inc., recommends the following seventeen (17) sites ineligible for inclusion in the National Register of Historic Places on the basis of systematic pedestrian surface survey and systematic shovel testing, and in one case (9GN362) additional archaeological testing and National Register eligibility, using formal archaeological test pit excavations: 9GN180, 9GN187, 9GN189, 9GN190, 9GN191, 9GN192, 9GN357, 9GN359, 9GN360, 9GN361, 9GN362, 9GN363, 9GN364, 9GN365, 9GN366, 9GN367, and 9GN368. After review of the information contained in the report, and on the basis of that information, we concur with the report's recommendations that these seventeen archaeological sites should be considered ineligible for inclusion in the National Register.

At the end of the consultant's Phase I archaeological survey effort, they recommended that ten sites be tested further, using additional closer interval shovel testing and the excavation of formal archaeological test units. The consultant reasoned that these sites exhibited enough artifact content, depth, and other characteristics that somewhat more detailed evaluation of them was necessary in order to make a reasoned determination of eligibility or ineligibility. These sites included the following: 9GN61, 9GN62, 9GN63, 9GN173, 9GN174, 9GN182, 9GN186, 9GN194, 9GN195, and 9GN358. One of these sites, 9GN62/9GN193, the consultant recommends as of unknown eligibility, but probably eligible. On the basis of the information contained in the report, and for the reasons stated therein, we agree that these ten sites should be, or should have been, subject to further, more formal testing and evaluation prior to making a reasoned determination of eligibility.

Subsequently sites 9GN173, 9GN174 and 9GN362 were tested using closer interval shovel testing and manual formal test unit excavations. On the basis of the testing results, the consultant recommends sites 9GN173 and 9GN174 eligible for inclusion in the National Register. Site 9GN362, as indicated above, is recommended ineligible for the National Register on the basis of similar testing and evaluation. On the basis of the information contained in the report, and for reasons stated therein, we concur with the report's recommendation that sites 9GN173 and 9GN174 should be considered eligible and site 9GN362 be considered ineligible. We further

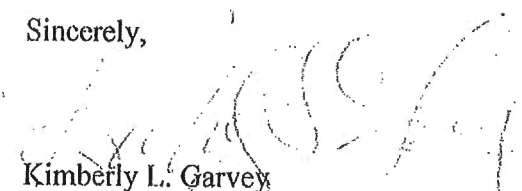
concur that site 9GN174 should be considered eligible at a state (regional) level of significance. Site 9GN173 we recommend eligible at least a local level of significance, and perhaps at a state level of significance.

The report, and ancillary information provided with it concerning the project (undertaking) does not provide sufficient information regarding the proposed project's effects to the sites recommended as eligible or of unknown ("potential") National Register eligibility status. Therefore, we will request your comments regarding our determination of effect once we have sufficient information to make such determination.

Copies of this letter have been supplied to the following individuals or agencies: Mr. H. Wilson Tillotson, Georgia Ports Authority, Post Office Box 2406, Savannah, Georgia, 31520; Mr. Thomas Gresham Southeastern Archeological Services, Inc. Post Office Box 8086, Athens, Georgia 30603 and Mr. Brandon Wall, Sligh Environmental Consultants, Inc., 31 Park of Commerce Way, Suite 200B, Savannah, Georgia 31405.

If you have any questions or require any additional information regarding this matter, please contact Ms. Sarah Wise, Regulatory Specialist, Coastal Branch, at 912-652-5550.

Sincerely,



Kimberly L. Garvey
Chief, Permits Section, Coastal Branch

Enclosures

IPaC Information for Planning and Consultation U.S. Fish & Wildlife Service

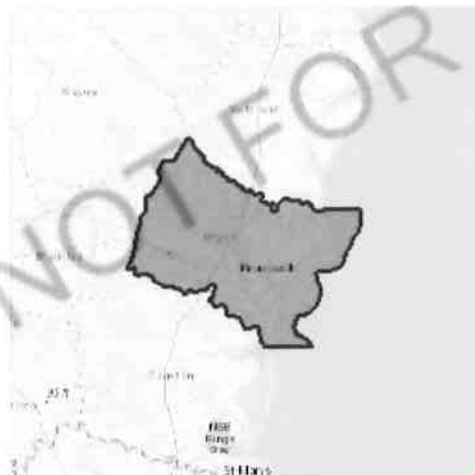
IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Glynn County, Georgia



Local office

Georgia Ecological Services Field Office

☎ (706) 613-9493

📅 (706) 613-6059

355 East Hancock Avenue
Room 320

Athens, GA 30601

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
West Indian Manatee <i>Trichechus manatus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/4469	Threatened Marine mammal

Birds

NAME	STATUS
Piping Plover <i>Charadrius melodus</i> [Great Lakes watershed DPS] - Great Lakes, watershed in States of IL, IN, MI, MN, NY, OH, PA, and WI and Canada (Ont.) There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/6039	Endangered
Piping Plover <i>Charadrius melodus</i> [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered. There is final critical habitat for this species. Your location overlaps the critical habitat. https://ecos.fws.gov/ecp/species/6039	Threatened
Red Knot <i>Calidris canutus rufa</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1864	Threatened
Wood Stork <i>Mycteria americana</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8477	Threatened

Reptiles

NAME	STATUS
Eastern Indigo Snake <i>Drymarchon corais couperi</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/646	Threatened
Gopher Tortoise <i>Gopherus polyphemus</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/6994	Candidate

Green Sea Turtle <i>Chelonia mydas</i>	Threatened
No critical habitat has been designated for this species.	
https://ecos.fws.gov/ecp/species/6199	

Leatherback Sea Turtle <i>Dermochelys coriacea</i>	Endangered
There is final critical habitat for this species. Your location is outside the critical habitat.	
https://ecos.fws.gov/ecp/species/1493	

Loggerhead Sea Turtle <i>Caretta caretta</i>	Threatened
There is final critical habitat for this species. Your location is outside the critical habitat.	
https://ecos.fws.gov/ecp/species/1110	

Clams

NAME	STATUS
Altamaha Spinymussel <i>Elliptio spinosa</i>	Endangered
There is final critical habitat for this species. Your location is outside the critical habitat.	
https://ecos.fws.gov/ecp/species/6920	

Flowering Plants

NAME	STATUS
Hairy Rattleweed <i>Baptisia arachnifera</i>	Endangered
No critical habitat has been designated for this species.	
https://ecos.fws.gov/ecp/species/8029	

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

This location overlaps the critical habitat for the following species:

NAME	TYPE
Piping Plover <i>Charadrius melodus</i>	Final
https://ecos.fws.gov/ecp/species/6039#crithab	

Migratory birds

Worksheet 2: Qualitative Worksheet for Wetland Adverse Impacts

Project Name:	IAP Expansion at CIT
Impact Wetland Name:	Fill
Acres of Impact (Acres):	1.26
Wetland Type:	Depressional/Flat Wetlands
Date:	May 8, 2019

Impact Factors

1. Wetland Qualitative Functional Capacity Score (WQFC)

<u>Index Description</u>	<u>Index Value</u>
Low	0.50

2. Impact Category Description (Impact Category)

<u>Index Description</u>	<u>Index Value</u>
Conversion of Kind	0.90

3. Product of WQFC and Impact (WQFC Impact) =

<u>Index Description</u>	<u>Index Value</u>
	0.45

4. Duration of Impact (Duration)

<u>Index Description</u>	<u>Index Value</u>
Permanent/Reoccurring	1.00

5. Product of WQFC Impact and Duration (Total WQFC Impact) =

<u>Index Description</u>	<u>Index Value</u>
	0.45

6. Product of Total WQFC Impact and Acres (Total 2018 Wetland Credits Owed) =

<u>Index Description</u>	<u>Index Value</u>
	0.57

7. Conversion of Total 2018 Wetland Compensation to Grandfathered Credits (Grandfathered Wetland Credits Owed) =

<u>Index Description</u>	<u>Index Value</u>
	4.54

Legend

- Green Cells = User must manually input information.
- Orange Cells = User must select the index choice from the drop-down list.
- Grey Cells = The calculation of these cells is automated.

NON-RIVERINE WETLAND QUALITATIVE ASSESSMENT

Project Name:	IAP Expansion at CIT
Impact Wetland Name:	All
Wetland Type:	Depression
WAA Center Coordinates:	-31.11213, -81.54145
Date:	4/25/2019

Water Storage -1

Answer	Questions
Yes	Are there above grade fills or structures obstructing hydrologic flows into or out of the wetland, or are there drainage structures, ditches, or man-made impoundments within 100 feet of the assessment area and within the catchment that are hydrologically affecting the wetland? (Y/N)
No	Is the contributing drainage basin at least 50 percent forested? (Y/N)
FUNCTION SCORE	Low

BioGeoChemical Cycling - 2

Answer	Questions
No	Is there large woody debris (LWD) in the wetland? (Y/N)
Yes	Has the vegetative community been adversely altered within the last 20 years? (Y/N)
FUNCTION SCORE	Low

Maintain Characteristic Wetland Community - 3

Answer	Questions
No	Has the vegetative community been adversely altered within the last 20 years? (Y/N)
Yes	Is there greater than 10 percent invasive cover (i.e., cumulative absolute cover across all strata)? (Y/N)
FUNCTION SCORE	Moderate

Maintain Faunal Habitat - 4

Answer	Questions
No	Has the vegetative community been adversely altered within the last 20 years? (Y/N)
Yes	Is there woody debris in the wetland? (Y/N)
Yes	Is the contributing drainage basin at least 50 percent forested? (Y/N)
FUNCTION SCORE	Low

WETLAND QUALITATIVE FUNCTIONAL CAPACITY SCORE	Low
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Legend

Green Cell = User must manually input information.
Orange Cells = User must select the choice from the drop-down list.
Grey Cells = The calculation of these cells is automated.
Dark Grey Cells = These cells do not require input. The corresponding value is populated from the user input to a previous question.