



REPLY TO
ATTENTION OF

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

NOVEMBER 07 2012

Regulatory Division
SAS-2009-00652

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-2009-00652

Applicant: Mr. Tom Exley
Post Office Box 416
Springfield, Georgia 31329

Agent: Resource and Land Consultants (RLC)
Attention: Mr. Alton Brown, Jr.
41 Park of Commerce Way, Suite 303
Savannah, Georgia 31405

Location of Proposed Work: The 193.3 acre project site is located approximately 3 miles north of the intersection of Interstate 95 and Georgia Highway 21, along the Chatham/Effingham County line, in both Chatham and Effingham Counties, Georgia (Latitude 32.2386, Longitude -81.2002).

Description of Work Subject to the Jurisdiction of the US Army Corps of Engineers: The applicant proposes to construct an industrial/manufacturing site on a 193.3 acre project site, which includes three warehouse facilities and two warehouse/assemble facilities. The proposed project would require 2.33 acres of jurisdictional wetland impact associated with construction of an access road. Two wetland crossings would be required at three impact locations. The first road crossing is located at the existing curb cut along Highway 21 and totals 2.06 acres. The second road crossing is located approximately 2,000 feet west of Highway 21 within the property and immediately adjacent to and east of the existing power line easement. The proposed road would include a 150' wide 4 lane asphalt access road entering the site from Highway 21. Lanes would be 12' in width with a 12' wide median/turn lane. In addition, the road tapers from a 150' wide roadway to a 100' wide 3 lane asphalt road. No jurisdictional area impacts are proposed for general development (building construction, parking, storm water ponds, etc.). According to the applicant, due to the arrangement and landscape position of the wetlands within the area, the jurisdictional impacts are unavoidable.

As compensatory mitigation for the project related jurisdictional waters impacts, the applicant is proposing to purchase 17.7 wetland mitigation credits from an approved mitigation bank that services the Lower Savannah River Watershed.

BACKGROUND

The US Army Corps of Engineers has completed jurisdictional determinations for both tracts included in the proposed project area. The 126.752 acre portion of the proposed project site located in Chatham County, Georgia, was completed by letter dated May 11, 2009, under project number SAS-2009-00348. The 65.13 acre portion of the proposed project site located in Effingham County, Georgia, was completed by letter dated June 29, 2009, under project number SAS-2009-00652. The remaining 1.42 acres are located within the powerline right of way and were verified by the USACE in 2005 as upland. The applicant states that the access point for the property at Georgia Highway 21 is at a fixed location due to the Georgia Department of Transportation and Effingham County completing the Effingham County Rincon by-pass project between 2008-2010 directly across Georgia Highway 21.

This Joint Public Notice announces a request for authorizations from both the US 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, US 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.

US 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: The applicant states: "A Phase I cultural resource survey has been completed for the entire project area during two separate surveys. The western portion of the property (west of the power line) was surveyed by Environmental Services, Inc. and reviewed and approved by the USACE and SHPO as part of the Port Wentworth town center relocation project in

the early 2000's. The eastern portion of the property (east of the power line) and adjacent to Highway 21 was surveyed by Brockington and Associates as part of the New Savannah Industrial Park project, but this parcel was not purchased nor included in the master plan permit for New Savannah. Based on both surveys and concurrence issued by both the USACE and SHPO, the proposed project will not impact any sites listed or eligible for listing on the National Register." However, the applicant has not provided any dates for the referenced letters or any copies of these letters.

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 US Department of the Interior, Fish and Wildlife Service, the US 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 applicant states: "RLC conducted a threatened and endangered species survey to determine the potential occurrence of animal and plants species (or their preferred habitats) currently listed as threatened or endangered by state and federal regulations [Federal Endangered Species Act of 1973 (16 USC 1531-1543)]. Neither the listed species nor habitats typically associated with these species were observed during the survey. Due to the location and current condition of the project area, as well as the absence of habitat and listed species, the proposed project is not likely to adversely impact any threatened or endangered species."

After review of the application and supporting information, the Savannah District has determined that the proposed project would not affect any Federally listed threatened or endangered species that are under the purview of US Department of the Interior, Fish and Wildlife Service (FWS). In addition, no other Federally listed threatened or endangered species that are under the purview of US Department of the Interior, Fish and Wildlife Service (FWS) would be affected). 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.

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 US 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 US 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.

The applicant provided an alternatives analysis that is attached to this JPN. Please note: no location information was provided on the available off-site alternative properties considered for this project; the market value of the proposed project site was not provided; the applicant claims that a 150' wide road is necessary to provide access to five warehouses, which would be reduced to 100' wide after the road passes three of the warehouses; and, 1 culvert is proposed in the location where the 2 acre wetland impact (i.e. Road Crossing 1) is proposed.

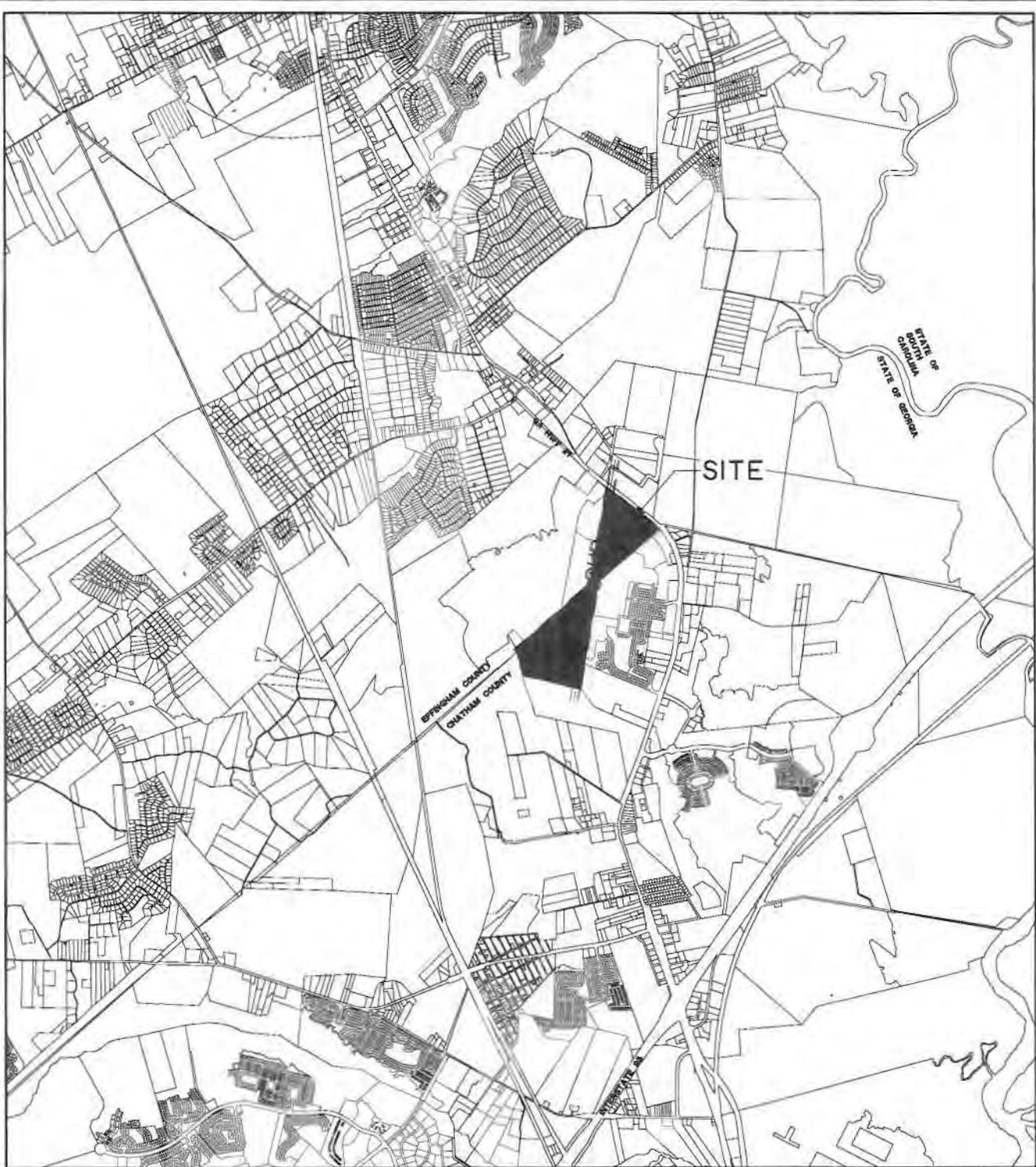
Public Hearing: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application for a Department of the Army Permit. Requests for public hearings shall state, with particularity, the reasons for requesting a public hearing. 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 Commander, Mr. Shaun Blocker, US Army Corps of Engineers, Savannah District, 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 Shaun L. Blocker, Project Manager, Coastal Branch at 912-652-5086.

5 Encls

1. Exley Industrial Tract Entrance, Sheet 1, Effingham and Chatham County, Georgia
2. Exley Industrial Tract Entrance, Sheets 3-6 dated September 21, 2012
3. Exley Tract Entrance (Alt 1, Alt 2, Alt 3, and Alt 4) dated July 30, 2012
4. Figure 1 – Exley Tract Industrial Site Access Topographic Map
5. Alternative Analysis, Pages 2-10



EXLEY INDUSTRIAL TRACT ENTRANCE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
TOMMY & TOM EXLEY

LOCATION: EFFINGHAM & CHATHAM COUNTY, GEORGIA
DATE: SEPTEMBER 21, 2012
JOB NUMBER: J - 24077.0000

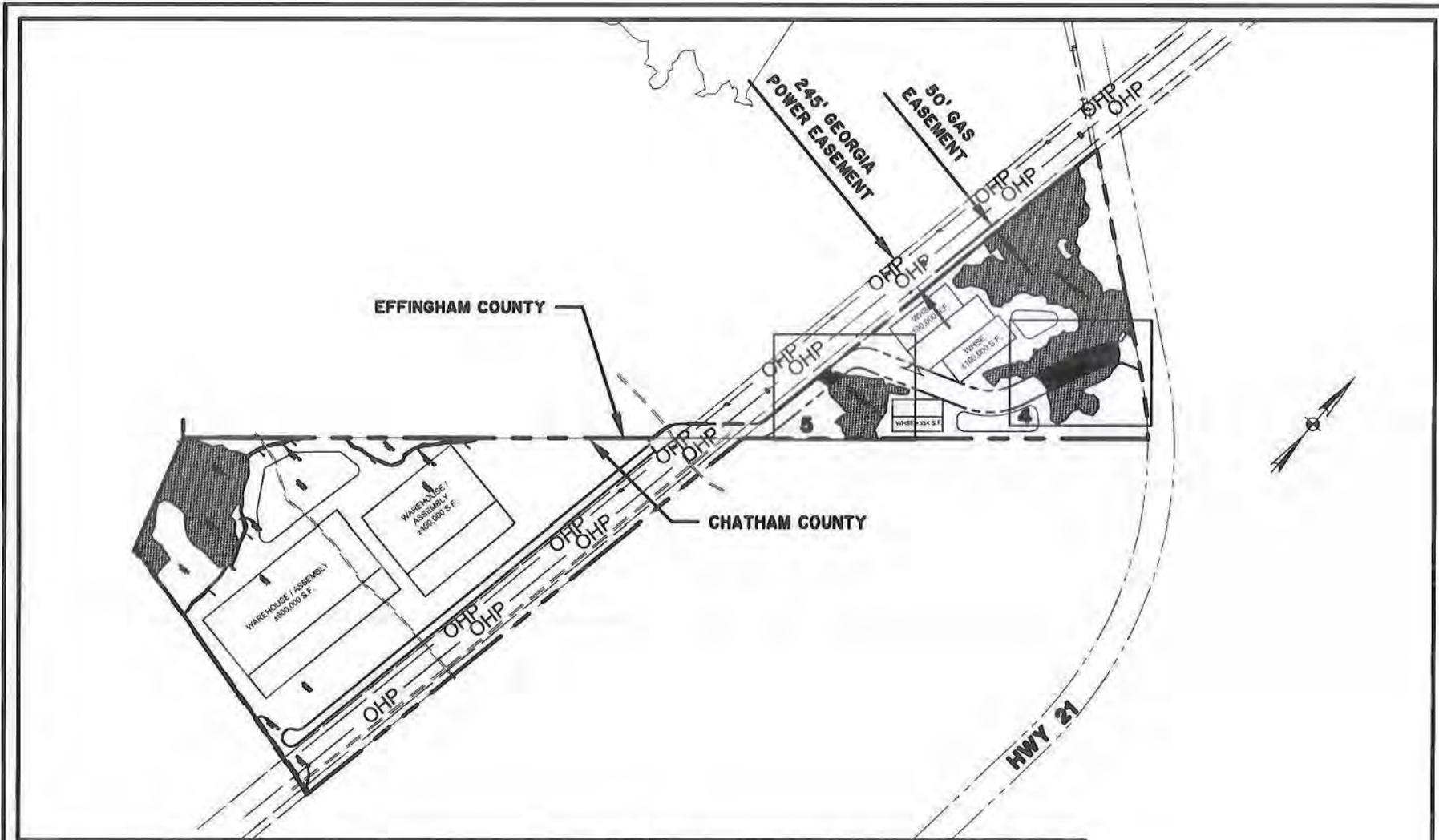
SHEET: 1
SCALE: N.T.S.

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EXLEY INDUSTRIAL TRACT ENTRANCE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
TOMMY & TOM EXLEY

LOCATION: EFFINGHAM & CHATHAM COUNTY, GEORGIA
 DATE: OCTOBER 24, 2012
 JOB NUMBER: J - 24077

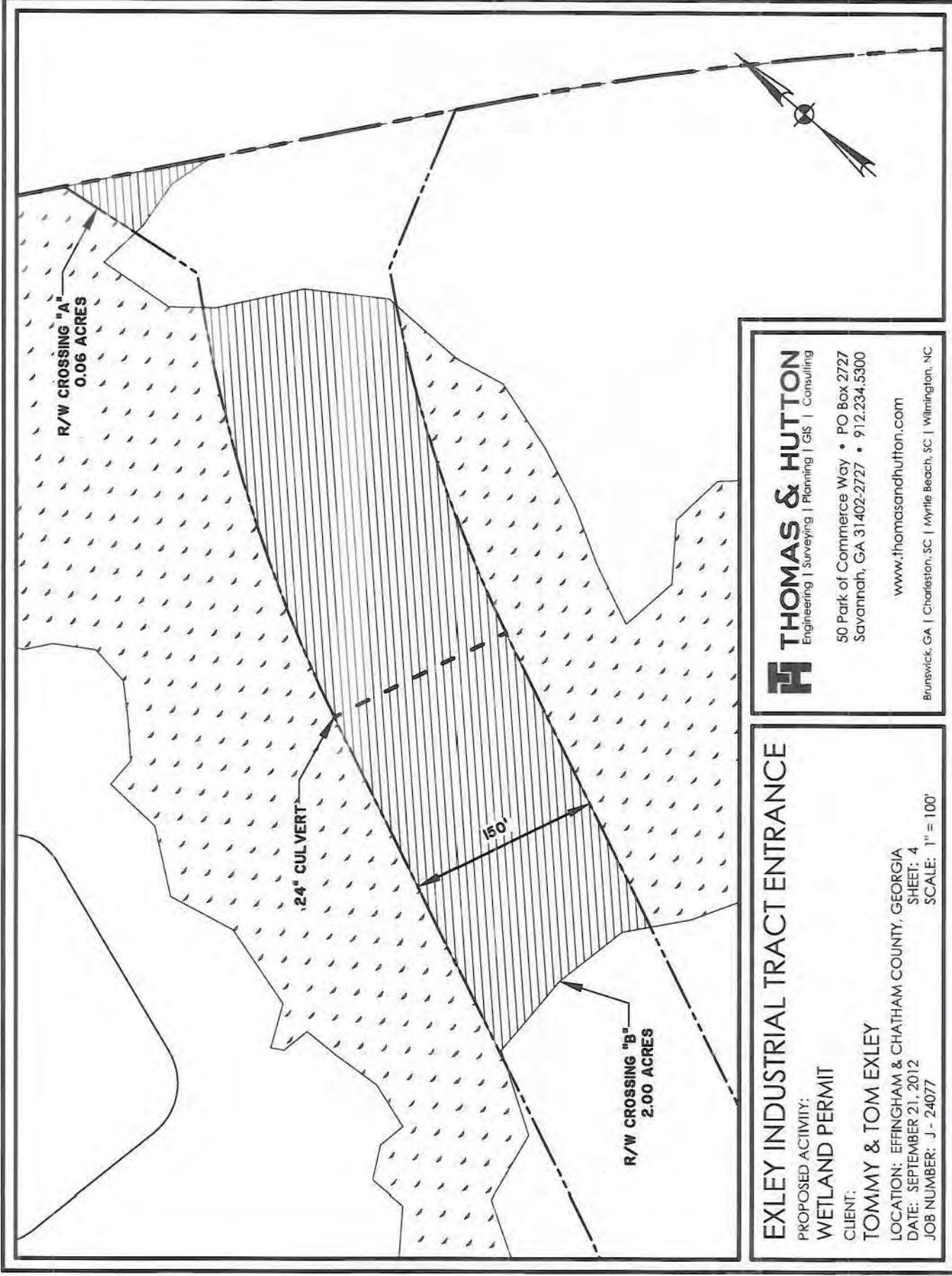
SHEET: 3
 SCALE: 1" = 1000'

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EXLEY INDUSTRIAL TRACT ENTRANCE

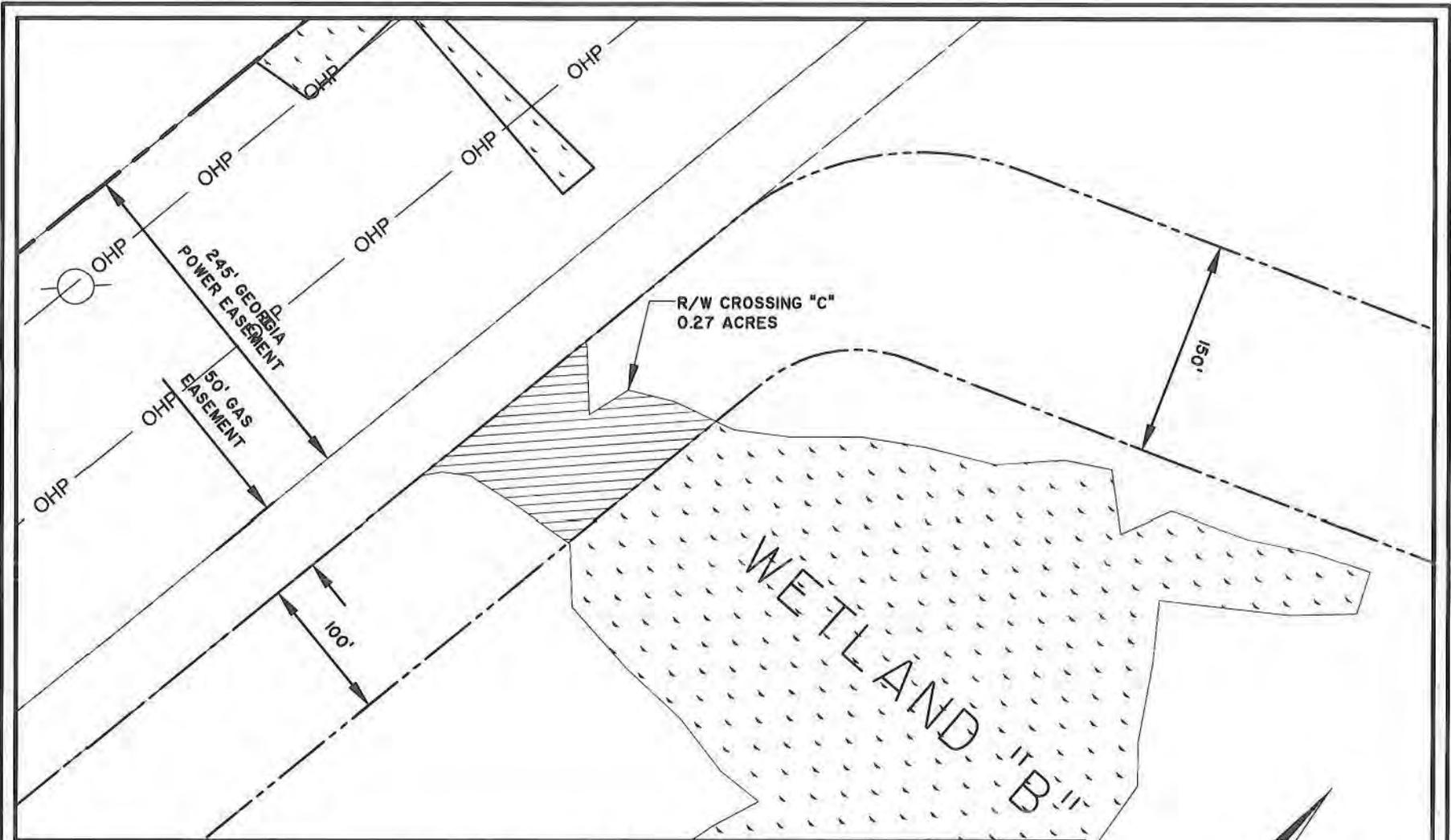
PROPOSED ACTIVITY:
WETLAND PERMIT
 CLIENT:
TOMMY & TOM EXLEY
 LOCATION: EFFINGHAM & CHATHAM COUNTY, GEORGIA
 DATE: SEPTEMBER 21, 2012
 JOB NUMBER: J - 24077
 SHEET: 4
 SCALE: 1" = 100'

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EXLEY INDUSTRIAL TRACT ENTRANCE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
TOMMY & TOM EXLEY

LOCATION: EFFINGHAM & CHATHAM COUNTY, GEORGIA

DATE: SEPTEMBER 21, 2012

JOB NUMBER: J - 24077

SHEET: 5

SCALE: 1" = 100'

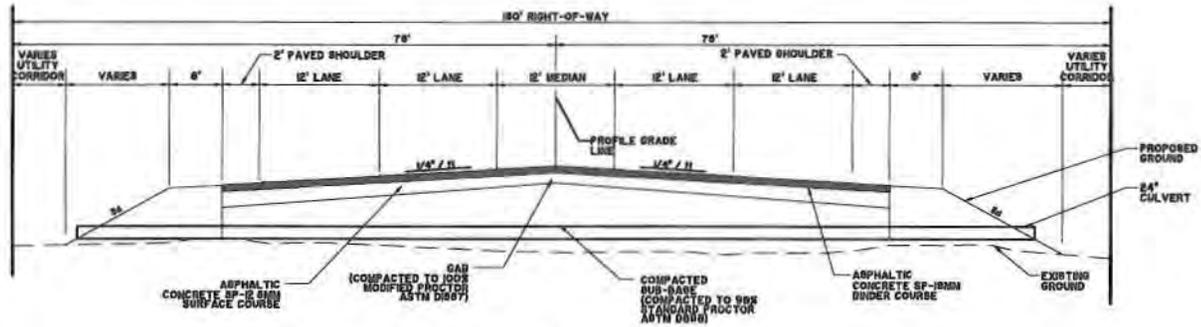
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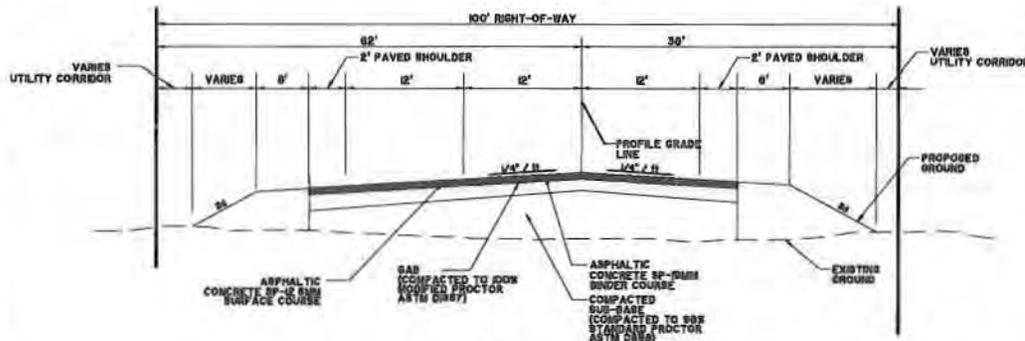
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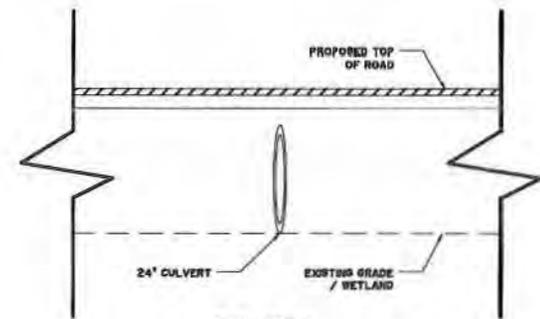




TYPICAL SECTION
NOT TO SCALE



TYPICAL SECTION
NOT TO SCALE



**CULVERT
TYPICAL SECTION**
NOT TO SCALE

EXLEY INDUSTRIAL TRACT ENTRANCE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
TOMMY & TOM EXLEY

LOCATION: EFFINGHAM & CHATHAM COUNTY, GEORGIA
DATE: SEPTEMBER 21, 2012
JOB NUMBER: J - 24077

SHEET: 6
SCALE: N.T.S.

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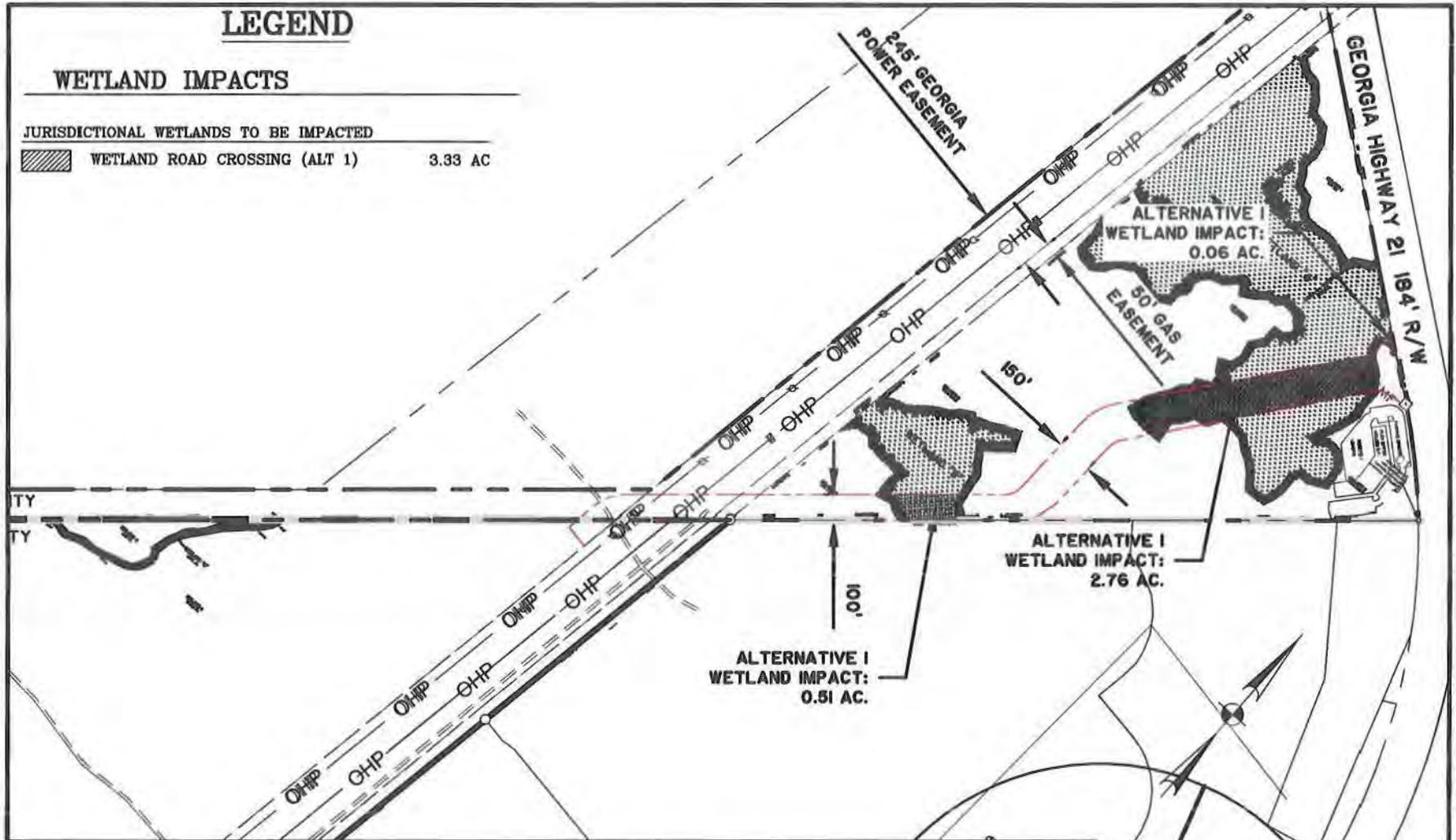
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LEGEND

WETLAND IMPACTS

JURISDICTIONAL WETLANDS TO BE IMPACTED

 WETLAND ROAD CROSSING (ALT 1) 3.33 AC



EXLEY TRACT ENTRANCE

PROPOSED ACTIVITY:
WETLAND PERMIT (ALT 1)

CLIENT:
TOMMY & TOM EXLEY

LOCATION: EFFINGHAM COUNTY, GEORGIA
DATE: JULY 30, 2012
JOB NUMBER: J - 24077

SHEET: EX A
SCALE: 1" = 600'

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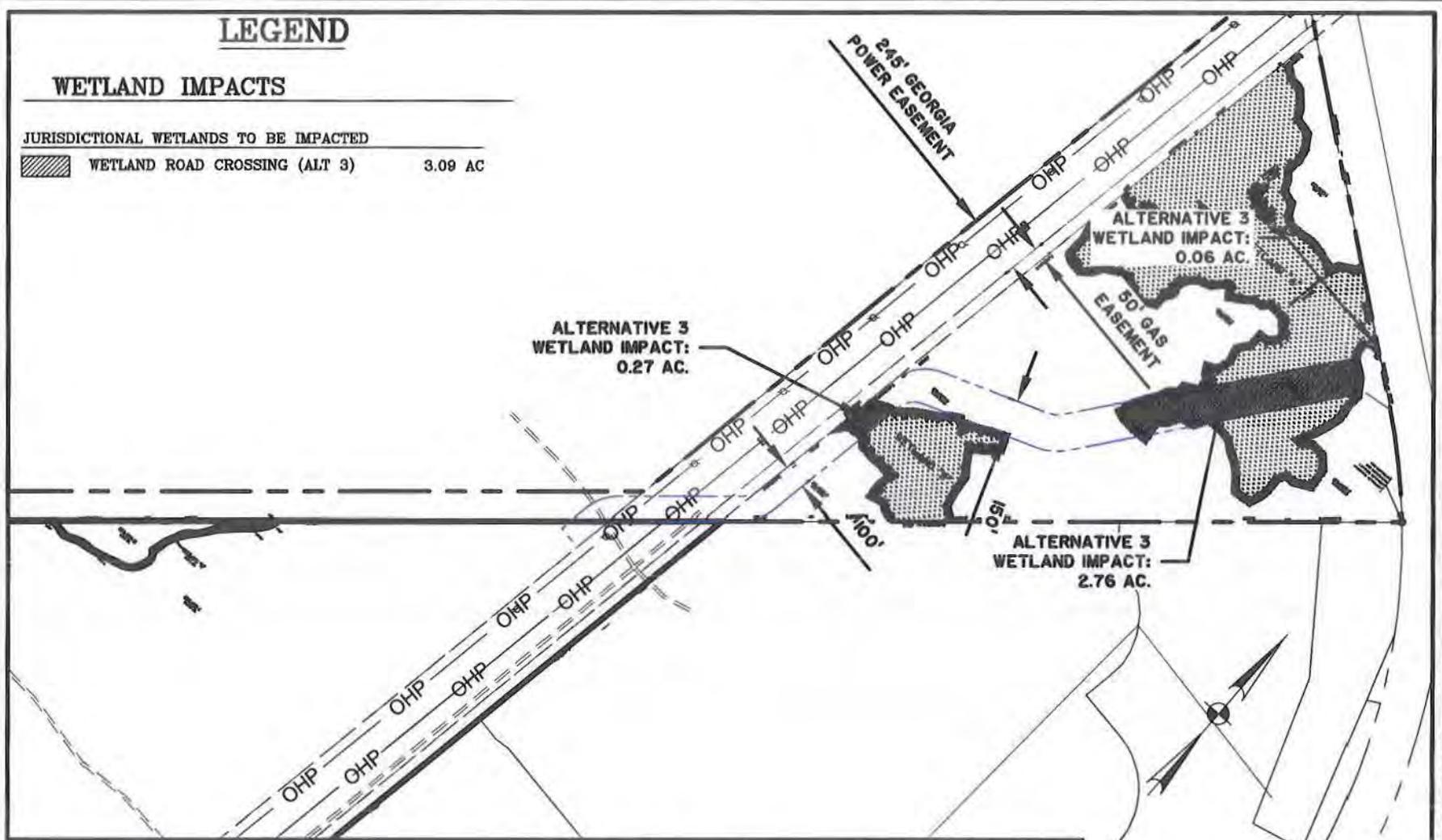
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LEGEND

WETLAND IMPACTS

JURISDICTIONAL WETLANDS TO BE IMPACTED

 WETLAND ROAD CROSSING (ALT 3) 3.09 AC



EXLEY TRACT ENTRANCE

PROPOSED ACTIVITY:
WETLAND PERMIT (ALT 3)

CLIENT:
TOMMY & TOM EXLEY

LOCATION: EFFINGHAM COUNTY, GEORGIA
DATE: JULY 30, 2012
JOB NUMBER: J - 24077

SHEET: EX C
SCALE: 1" = 600'

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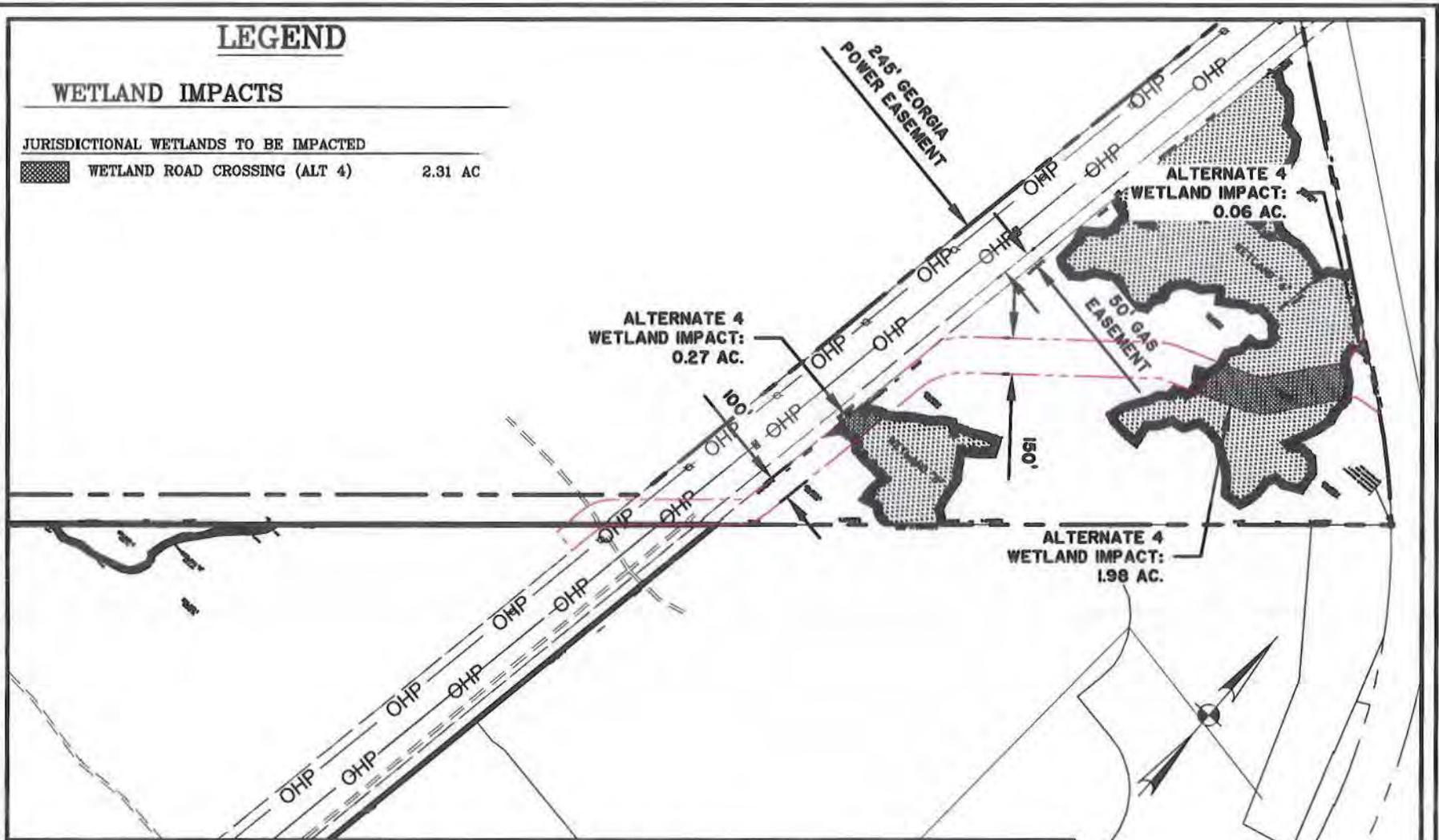
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LEGEND

WETLAND IMPACTS

JURISDICTIONAL WETLANDS TO BE IMPACTED

 WETLAND ROAD CROSSING (ALT 4) 2.31 AC



EXLEY TRACT ENTRANCE

PROPOSED ACTIVITY:
WETLAND PERMIT (ALT 4)

CLIENT:
TOMMY & TOM EXLEY

LOCATION: EFFINGHAM COUNTY, GEORGIA
DATE: JULY 30, 2012
JOB NUMBER: J - 24077

SHEET: EX D
SCALE: 1" = 600'

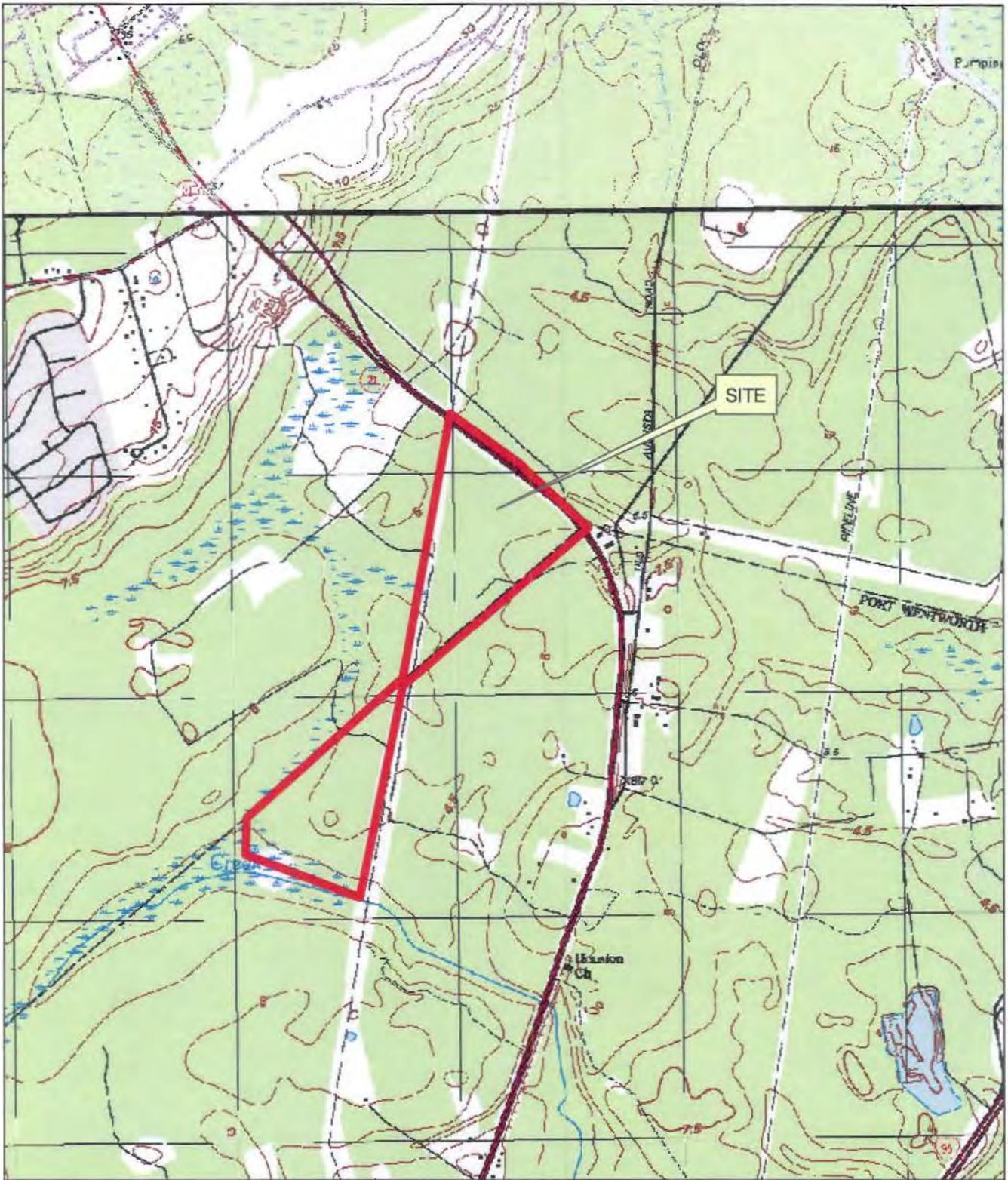


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US GEOLOGICAL SURVEY;
PORT WENTWORTH & RINCON QUADS

OCTOBER 2012

MAP SCALE : 1 INCH = 2000 FEET

PREPARED BY: AB

RLC PROJECT NO. 12-089

FIGURE 1
EXLEY TRACT INDUSTRIAL SITE ACCESS
EFFINGHAM & CHATHAM COUNTY, GEORGIA

PREPARED FOR:
MR. TOM EXLEY

2,000 1,000 0 2,000 Feet



RLC	RESOURCE+LAND CONSULTANTS
	41 Parker Commons Way, Ste. 300 Savannah, Georgia 31404
	912.428.8888 • www.rlc.com

water oak (*Quercus nigra*), inkberry (*Ilex glabra*), wax myrtle (*Myrica cerifera*), blackberry (*Rubus spp.*), bracken Fern (*Pteridium aquilinum*), cinnamon fern (*Osmunda cinnamomea*) and a variety of other species common for upland areas within the Coastal Plain of Georgia.

3.2 Forested Wetland: Wetland areas within the site total 31.17 acres and contain a mixed overstory and understory. The overstory is dominated by sweetgum, red maple (*Acer rubrum*), loblolly pine, red bay, and swamp tupelo (*Nyssa sylvatica*). The shrub and herbaceous layer contains wax myrtle, Chinese privet (*Ligustrum sinense*), wool grass (*Dichanthelium scabriusculum*), cat-tail (*Typha latifolia*), greenbrier (*Smilax spp.*), sedges (*Carex spp.*), and netted chain-fern (*Woodwardia aerolata*).

3.3 Power Line Easement: A portion of the property contains maintained power-line easement associated with a large transmission line. This area is dominated by naturally regenerating sapling, shrub and herbaceous species common for the Coastal Plain of Georgia. As with most major transmission lines, this corridor is maintained regularly through herbicide application and mowing.

3.4 Drainage Ditch: Several drainage ditches are also present within the project area. The ditches were constructed within wetland and upland and are commonly found on most properties within coastal Georgia. The ditches vary in size from one to four feet in depth and three to five feet in width.

4.0 PROPOSED PROJECT:

The proposed project will require 2.33 acres of wetland impact during the construction of an access road. Two wetland crossings will be required. The first road crossing (R/W Crossing A & B depicted on the permit drawings found in Attachment C) is located at the existing curb cut along Highway 21 and totals 2.06 acres. The second road crossing is located approximately 2,000 feet west of Highway 21 within the property and immediately adjacent to and east of the existing power line easement. The proposed road will include a 150' wide 4-lane asphalt access road entering the site from Highway 21. Lanes will be 12' in width with a 12' wide median/turn lane. In addition, the road tapers from a 150' wide roadway to a 100' wide 3-lane asphalt road. No jurisdictional area impacts are proposed for general development (building construction, parking, storm water ponds, etc.). Impacts associated with the project include the following:

Table 1.

Habitat	Location	Activity	Impact Acreage
Wetland	Highway 21 Intersection	Road Crossing A	0.06
Wetland	Highway 21 Intersection	Road Crossing B	2.00
Wetland	Within Property	Road Crossing C	0.27
Total			2.33

A culvert will be installed within the first road crossing (impact Area B) to maintain hydrologic connectivity within the wetland area. Because the second road crossing has been designed to impact the upper end of the wetland rather than bisecting the system, no culverts are proposed.

The project area contains 31.17 acres of jurisdictional wetland, of which 28.84 acres will be avoided and remain undisturbed.

5.0 ALTERNATIVE ANALYSIS:

As part of the overall project, the applicant completed a thorough alternatives analysis. A review of the 404(b)1 guidelines indicates that "(a) Except as provided under section 404(b)(2), no discharge of dredged or fill material shall 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." The guidelines define practicable alternatives as "(q) The term *practicable* means available and

capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.”

The guidelines outline further consideration of practicable alternatives: “(1) For the purpose of this requirement, practicable alternatives include, but are not limited to: (i) Activities which do not involve a discharge of dredged or fill material into the waters of the United States or ocean waters; (ii) Discharges of dredged or fill material at other locations in waters of the United States or ocean waters; (2) An 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. If it is otherwise a practicable alternative, an area not presently owned by the applicant which could reasonably be obtained, utilized, expanded or managed in order to fulfill the basic purpose of the proposed activity may be considered.”

Considering the guidelines above, the applicant conducted a review of land for sale in Effingham and Chatham County between 150 and 500 acres. Only six tracts are currently listed for sale. The following table provides a summary of available tracts.

Tract #	Tract Size	County	Estimated Wetland/Waters Ac.	Upland Ac.	Price	Suitable Access/Location
1	151 Ac.	Chatham	150.5	0.5	\$299,653	No
2	170.92 Ac.	Chatham	90.92	80	\$540,000	No
3	350 Ac.	Chatham	200	150	\$4,950,000	Yes
4	424	Effingham	247	177	\$545,000	No
5	483	Effingham	363	120	\$918,517	No
6	222	Effingham	100	122	\$489,060	No

Of the six tracts identified above, Tract 1 and Tract 2 did not provide suitable upland acreage or site access. Tracts 4, 5, & 6 did not provide suitable upland acreage and are located in rural areas unable to support a ports related warehousing/manufacturing facility. Tract # 3 afforded suitable access however; the upland area is fragmented by large areas of jurisdictional wetland and waters. Creation of development pods, within Tract 3, large enough to support the construction of an industrial park (large buildings and parking areas) would require an estimated impact area of greater than 10 acres. In addition, the acquisition cost for Tract #3 (excluding development, permitting and mitigation cost) is 7 times the estimated cost of the proposed site. When taking into consideration cost, environmental consequences, existing technology, and logistics in light of overall project purposes, no practicable alternative tract is available.

Since alternative sites were not practicable, the applicant considered alternatives to provide access to the subject property. The following provides a description of other routes considered during the plan review process as well as on-site alternatives considered in an effort to avoid and minimize on-site wetlands to the greatest extent practicable.

5.1 Summary of Alternative Routes Screened for Practicability: Considering that the purpose of the project is to provide access to a 193.30 acre tract, the applicant reviewed four alternatives (three alternative routes in addition to the proposed route). The following provides a summary of each alternative. Location for each alternative route is provided in Figure 2.

- A. **Applicants Preferred Alternative:** The applicant’s preferred alternative includes construction of a site entrance road from Highway 21. While the project site contains approximately 1,556 linear feet of Highway 21 frontage, access into the property from 21 is limited to a fixed location/curb cut established by the Georgia Department of Transportation. This curb cut is located at the intersection of Highway 21 and Old Augusta Road. Improvements to this intersection were recently completed during 2008-2010 along Highway 21 as part of the overall Effingham County Rincon by-pass project.

The new intersection will include a traffic signal to allow entrance and exit from Highway 21 which is a four lane divided highway. Since this location has been permanently established and flexibility in the location is not afforded, this alternative provides suitable access to the site and is practicable.

- B. **Alternative Route 1.** This route includes creating access to the site from property located adjacent to and south of the proposed project. Access would occur through Rice Creek which currently contains both single and multi-family residential developments. Due to the conflicts associated with industrial truck traffic traveling through a residential neighborhood, this alternative was determined to be not practicable.
- C. **Alternative Route 2.** Alternative Route 2 includes creating access to the site from property located adjacent to and north of the project area. This route would provide access to the project area from Highway 21 (approximately 1,900 feet north) through a large master planned development tract. This alternative route provides suitable access to the project area but this property is not owned by the applicant and opportunities to construct a new road are not available. Thus, this alternative is not practicable.
- D. **Alternative Route 3.** This alternative route would include construction of a new road from Hodgeville Road. The new road would total approximately 3.81 miles. This alternative route provides suitable access to the project area and was determined to be practicable.

Based on the site analysis above, the applicants Preferred Alternative and Alternative Route 3 were determined to be practicable. Table 3 provides an overall summary of site screening criteria to each alternative site.

Table 2.

Site Screening Selection Criteria	Preferred Alternative	Alternative Route 1	Alternative Route 2	Alternative Route 3
Practicable Alternative	Yes	No	No	Yes

5.2 Review of Practicable Alternatives: Following consideration of alternative routes using the screening criteria, the applicant completed an analysis of practicable alternatives to identify the least environmentally damaging practicable alternative pursuant to 40 CFR 230.7(b)(1). The purpose of the below analysis is to ensure that “no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem”. The applicant evaluated potential environmental impacts that would result from installation of a new access road. This evaluation was completed by considering several environmental factors listed below, as well as additional non-environmental factors that could impact development of the site.

Environmental Factors:

- Stream Impacts (quantitative). The linear footage of potential stream impact was evaluated for each practicable alternative.
- Stream Impacts (qualitative). The functional value of potential stream impact areas was evaluated for each practicable alternative.
- Wetland Impacts (quantitative). The acreage of potential wetland impact was evaluated for each practicable alternative.
- Wetland Function (qualitative). The functional value of potential wetland impact areas was evaluated for each practicable alternative.

- Impacts to Other Waters (quantitative). The acreage of open water impact for each site was considered during review of each practicable alternative.
- Other Waters Functions (qualitative). The functional value of any open water impact areas was evaluated for each practicable alternative.
- Federally Listed Threatened or Endangered Species. A preliminary assessment of each practicable alternative was conducted to determine the potential occurrence of animal and plants species (or their preferred habitats) currently listed as threatened or endangered by state and federal regulations [Federal Endangered Species Act of 1973 (16 USC 1531-1543)]. The U.S. Fish and Wildlife Service (USFWS) lists the following plant and animal species as endangered or threatened in Chatham & Effingham Counties, Georgia:

CHATHAM COUNTY:

Plants

- Pondberry (*Lindera melissifolia*)

Mammals

- Humpback Whale (*Megaptera novaeanglie*)
- Northern Atlantic Right Whale (*Eubalaena glacialis*)
- Manatee (*Trichechus manatus*)

Birds

- Bachman's Warbler (*Vermivora bachmanii*)
- Piping Plover (*Charadrius melodus*)
- Red-Cockaded Woodpecker (*Picoides borealis*)
- Wood Stork (*Mycteria americana*)

Reptiles

- Eastern Indigo Snake (*Drymarchon corais couperi*)
- Green Sea Turtle (*Chelonia mydas*)
- Hawksbill Sea Turtle (*Eretmochelys imbricate*)
- Kemp's Ridley Sea Turtle (*Lepidochelys kempii*)
- Leatherback Sea Turtle (*Dermochelys coriacea*)
- Loggerhead Sea Turtle (*Caretta caretta*)

Amphibians

- Flatwoods Salamander (*Ambystoma cingulatum*)

Fish

- Shortnose Sturgeon (*Acipenser brevirostrum*)

EFFINGHAM COUNTY:

Plants

- Pondberry (*Lindera melissifolia*)

Birds

- Red cockcaded woodpecker (*Picoides borealis*)
- Wood stork (*Mycteria americana*)

Reptiles

- Eastern indigo snake (*Drymarchon corais couperi*)

Amphibians

- Flatwoods salamander (*Ambystoma cingulatum*)

Fish

- Shortnose sturgeon (*Acipenser brevirostrum*)
- Cultural Resources. A phase I cultural resources survey was completed within the project area and a preliminary assessment of cultural resources was conducted for each alternative route by reviewing available State Historic Preservation Office information at <http://www.nr.nps.gov/>.
- Flood Plain Impact. The potential of flood plain impact was evaluated for each practicable alternative.
- Stream Buffer Impact. The linear footage of potential stream buffer impact was evaluated for each practicable alternative.

Other Factors:

- Right of Way/Easement Acquisition: For the purposes of this analysis, property ownership and property acquisition requirements were noted.

5.2.1 No Action Alternative: Obviously with every project, a “no action” alternative must be considered. The proposed project has been initiated to facilitate construction of a site access road from a GDOT established curb cut at a major intersection along Highway 21. The “no-action alternative” does avoid impacts to wetland resources; however, this alternative creates an isolated parcel with no vehicular access. While the current project includes development of an industrial site, any proposal including, residential development, recreational management and/or timber management would require construction of an access road at this GDOT established ingress/egress location. Because this alternative would prohibit access to this 193.30 acre site, the “no-action” alternative is not feasible.

5.2.2 Proposed Action or Applicant’s Preferred Alternative: The applicant’s preferred alternative includes construction of an access road from Highway 21 into the subject tract. The following provides a brief assessment of factors associated with the proposed and preferred alternative.

Environmental Factors:

- Stream Impacts (quantitative). No stream impacts are associated with this alternative.
- Stream Impacts (qualitative). No stream impacts are associated with this alternative.
- Wetland Impacts (quantitative). The applicant’s preferred alternative includes 2.33 acres of wetland impact.
- Wetland Function (qualitative). Based on the current site conditions observed during field review and delineation of the site and review of historic aerial photography, wetland areas have experienced minor impacts associated with fragmentation from construction of Highway 21, past ditching and general silvicultural/land management practices. While these actions may have resulted in the minor degradation of these wetlands, these areas remain functional.
- Impacts to Other Waters (quantitative). No “Other Waters” present within the project corridor/site will be impacted by the proposed project.
- Other Waters Functions (qualitative). No “Other Waters” present within the project corridor/site will be impacted by the proposed project.
- Federally Listed Threatened or Endangered Species. RLC conducted a threatened and endangered species survey to determine the potential occurrence of animal and plants species (or their preferred habitats) currently listed as threatened or endangered by state and federal regulations [Federal Endangered Species Act of 1973 (16 USC 1531-1543)]. Neither the listed species nor habitats typically associated with

these species were observed during the survey. Due to the location and current condition of the project area, as well as the absence of habitat and listed species, the proposed project is not likely to adversely impact any threatened or endangered species.

- **Cultural Resources.** A Phase I cultural resource survey has been completed for the entire project area during two separate surveys. The western portion of the property (west of the power line) was surveyed by Environmental Services and reviewed and approved by the USACE and SHPO as part of the Port Wentworth town center relocation project in the early 2000's. The eastern portion of the property (east of the power line) and adjacent to Highway 21 was surveyed by Brockington and Associates as part of the New Savannah Industrial Park project but this parcel was not purchased nor included in the master plan permit for New Savannah. Based on both surveys and concurrence issued by both the USACE and SHPO, the proposed project will not impact any sites listed or eligible for listing on the National Register.
- **Flood Plain Impact.** According to the GA FIRM Maps, the applicant's preferred site will require a minimal amount of flood plain impacts.
- **Stream Buffer Impact.** No stream buffer impacts are associated with this alternative.

Other Factors:

- **Parcel Assemblage:** The preferred alternative consists of a single parcel owned by the applicant. No easement or right-of-way acquisition is required.

5.2.3 Alternative Route 3: This alternative would include construction of a new road from Hodgeville Road east approximately 3.8 miles to the subject tract. Based on review of aerial photography, habitats within this project corridor would be considered common for Effingham and Chatham Counties. The following provides a brief assessment of factors associated with the proposed and preferred alternative.

Environmental Factors:

- **Stream Impacts (quantitative).** No stream impacts are associated with this alternative.
- **Stream Impacts (qualitative).** No stream impacts are associated with this alternative.
- **Wetland Impacts (quantitative).** Based on review of aerial photography, U.S. Geological Survey Topographic Maps, NWI, etc., wetland impacts associated with alternative would total an estimated 3,950 linear feet of wetland road crossing and 13.60 acres of wetland impacts.
- **Wetland Function (qualitative).** Based on review of the NWI, topographic survey, and historic aerial photography the wetland areas within this corridor have experienced minor impacts associated with fragmentation from construction of Hodgeville Road, installation of utility lines (gas and power), installation of a rail line, and past ditching and general silvicultural/land management practices. While these actions may have resulted in the minor degradation of these wetlands, these areas appear to remain functional.
- **Impacts to Other Waters (quantitative).** No "Other Waters" impacts are associated with this alternative.
- **Other Waters Functions (qualitative).** No "Other Waters" impacts are associated with this alternative.
- **Federally Listed Threatened or Endangered Species.** Although a threatened and endangered species survey has not been conducted, a preliminary assessment and data base review coupled with the location and habitat types would indicate that neither listed species nor habitat typically associated with these species are present within the Alternative Route 3. Therefore, no adverse impacts to federally listed threatened and endangered species are expected.

- **Cultural Resources.** A Phase I cultural resource survey has not been completed within the project area. However, based on a review of the NHR database, no sites are known to occur within this alternative route.
- **Flood Plain Impact.** According to the GA FIRM Maps, the Alternative 3 would require significant flood plain impacts.
- **Stream Buffer Impact.** No stream buffer impacts are associated with this alternative.

Other Factors:

- **Right of Way/Easement Acquisition:** Based on review of tax assessor office information for Effingham and Chatham Counties, this alternative would require right-of-way/easement acquisition on a minimum of 11 parcels, as well as construction of an overpass over an existing rail road.

5.2.4 Summary of Off-Site Alternatives Analysis: Based on the assessment of alternatives analysis completed above, the Applicant’s Preferred Alternative is the least damaging practicable alternative. The Applicant’s Preferred Alternative is currently owned by Mr. Tommy and Tom Exley. Any selection and acquisition of an alternative site would require the sale of the Applicant’s Preferred Site. Table 4 provides a summary of the practicable alternatives and the values for each factor.

Table 3. Least Environmentally Damaging Practicable Alternative Summary

FACTORS	No Action Alternative	Applicant’s Preferred	Alternative Route 3
Stream Impacts (Linear Feet)	None	None	None
Loss in Stream Function	None	None	None
Wetland Impacts (Acres)	None	2.33 ac	13.5
Loss in Wetland Function	None	Medium	Medium
Impacts to Other Waters (Acres)	None	None	None
Loss of Other Waters Functions	None	None	None
Federal Endangered Species	N/A	No	No
Cultural Resources	N/A	No	No
Flood Plain	N/A	Yes	Yes
Stream Buffer	N/A	No	No
LEDPA	N/A	Yes	No

5.3 On-Site Alternatives & Avoidance/Minimization: In addition to the determination that the proposed project was the most practicable and least damaging alternative, the applicant considered opportunities to avoid and minimize jurisdictional area impacts to the greatest extent practicable.

The proposed site plan includes five warehousing and distribution facilities including three warehouses east of the power line and two west of the power line. The proposed project includes construction of a 150 foot wide access corridor from Highway 21 necessary to accommodate the traffic from all five facilities. However, as number of facilities decreases from five to two and traffic is reduced towards the rear (western portion) of the property the applicant was able to transition to a 100 foot wide roadway.

Because the site entrance is a fixed location established by GDOT, the applicant was afforded only two minimization opportunities including reduction in road footprint width and alternate road alignment. The first consideration for minimization of impacts included review of road widths. The applicant considered several alternatives and opportunities to reduce the width of the proposed road crossings. Table 4 provides a summary of alternatives considered for each wetland crossing.

Table 4. Access Road Width

Crossing 1								
Scenario	Paved Shoulder	Non-Paved Shoulder	Lanes	Median	Turn Lane	Utility Corridor	Slope	Total Width
Proposed	2'x2=4'	8'x2=16'	12'x4=48'	12'	N/A	30'x2=60'	5'x2=10'	150'
Alternate 1	4'x2=8'	8'x2=16'	12'x4=48'	N/A	14'	30'x2=60'	5'x2=10'	156'
Alternate 2	2'x2=4'	8'x2=16'	12'x4=48'	N/A	14'	30'x2=60'	5'x2=10'	152'
Alternate 3	4'x2=8'	8'x2=16'	12'x4=48'	12'	N/A	30'x2=60'	5'x2=10'	154'

Crossing 2								
Scenario	Paved Shoulder	Non-Paved Shoulder	Lanes	Median	Turn Lane	Utility Corridor	Slope	Total Width
Proposed	2'x2=4'	8'x2=16'	12'x2=24'	12'	N/A	15'x2=30'	7'x2=14'	100'
Alternate 1	2'x2=4'	8'x2=16'	12'x4=48'	12'	N/A	30'x2=60'	5'x2=10'	150'
Alternate 2	4'x2=8'	8'x2=16'	12'x2=24'	12'	N/A	15'x2=30'	7'x2=14'	104'
Alternate 3	4'x2=8'	8'x2=16'	12'x2=24'	N/A	14'	15'x2=30'	5'x2=10'	102'

It is important to note that limited flexibility is afforded in the design of roadways. Maintaining safety, traffic accommodation requirements, turn lanes, etc. is required for any road project. In addition, maintaining utility easements on both sides of the roadway to provide a power loop, separation of water and sewer, and separation of easement area (10 foot minimum width to provide maintenance access) for each utility company is unavoidable. Considering these road design restrictions and based on the considerations above, the applicant has proposed a minimum width feasible.

In addition to road width, the applicant considered five routes from accessing the site from the Highway 21 curb cut established by GDOT. Table 5 provides a summary of alternatives considered for each wetland crossing and Attachment D provides exhibits depicting each alternative.

Table 5. Access Road Location

Alternative	Wetland Crossing 1 (Adjacent to Highway 21)	Wetland Crossing 2 (Internal Road Crossing)	Total Wetland Impact (acres)
(Proposed)	2.06	0.27	2.33
Alternate 1	2.82	0.51	3.33
Alternate 2	2.15	0.51	2.66
Alternate 3	2.82	0.27	3.09
Alternate 4	2.04	0.27	2.31

Based on review of alternative road widths and road alignment designs documented above and in the attached drawings, the current site design and layout avoids and minimizes wetland impacts to the greatest extent practicable while still satisfying the overall project purpose. While Alternate 4 reduces the road impacts by 0.02 acre (compared to the proposed alignment), Alternate 4 extends through the proposed 200,000 square feet of warehousing space. Maintaining the project warehouse square footage and the Alternate 4 road alignment would

require shifting warehouse space south and east/west and ultimately increase the overall impact acreage.

6.0 STORM WATER MANAGEMENT:

Thomas & Hutton Engineering Co., the consulting engineer, is designing the stormwater master plan for the project. Although this plan has not yet been finalized, preliminary design includes construction of a stormwater management pond that is being designed to accommodate the stormwater volume associated with development of the site. The final plan will meet any and all storm water management requirements of the local and state authorities. No impact to wetlands and/or streams are proposed as a result of the construction of the storm water detention ponds and all stormwater management facilities will be constructed in upland area.

7.0 COMPENSATORY MITIGATION:

As indicated above, the proposed project requires 2.33 acres of permanent wetland fill. Preliminary mitigation credit calculations indicate that the proposed wetland impact requires 17.7 wetland mitigation credits to compensate for the 2.33 acres of unavoidable impact (Attachment E). Upon approval of the proposed project and prior to initiation of authorized wetland impacts, the applicant will purchase 17.7 wetland mitigation credits from an approved mitigation bank currently servicing the Lower Savannah River Watershed.

8.0 CONCLUSION:

In summary, Mr. Tommy and Tom is seeking authorization to impact jurisdictional wetland during installation/construction of an entrance road to facilitate access to a proposed 193.30 acre industrial/manufacturing site located approximately 3 miles north of the intersection of Interstate 95 and Highway 21, along the Effingham/Chatham County line, within both Effingham and Chatham County, Georgia. The proposed project is the result of numerous design plan reviews during which the applicant, engineer, and environmental consultant were able to further avoid and minimize wetland impacts. While the applicant has avoided and minimized impacts to jurisdictional waters to the greatest extent practicable, the project will require 2.33 acres of jurisdictional wetland impacts to facilitate implementation of the overall site plan. As compensatory mitigation for the proposed impacts, the applicant is proposing the purchase of 17.7 wetland mitigation credits from an USACE approved mitigation bank. All development activities will be conducted using best management practices to prevent unintended or secondary impacts to wetlands and waters adjacent to the project site.