



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

November 19, 2020

Regulatory Branch  
SAS-2020-00054

**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-2020-00054

Applicant: Mr. Brian Hollings  
CenterPoint Properties  
250 Pehle Avenue, Suite 410  
Saddle Brook, NJ 07663

Agent: Mr. Alton Brown, Jr.  
Resource and Lan Consultants  
41 Park of Commerce Way, Suite 101  
Savannah, Georgia 31405

Project Purpose as Proposed by Applicant: The applicant's stated project purpose is "... to obtain a permit from the USACE authorizing jurisdictional wetland impacts required for expansion of the existing facility and construction of an additional building."

Location of Proposed Work: The project site is located adjacent to and east of Dean Forrest Road and north of Pipemakers Canal, within Garden City, Chatham County, Georgia (Latitude 32.1089, Longitude -81.1917).

Description of Work Subject to the Jurisdiction of the U.S. Army Corps of Engineers: The applicant proposes to impact 1.4 acre of wetland to construct an industrial park. The project would include the construction of two 350,000 square foot warehouses, a 14.95-acre parking area to accommodate 250 trailers, employee parking, and associated infrastructure.

Utilizing the current Savannah District Standard Operating Procedure for Compensatory Mitigation, the applicant has proposed the purchase of 8.40 grandfathered wetland credits to compensate for the 1.4 acres of wetland impacts. These credits will be acquired from a primary service area mitigation bank that services the Lower Savannah watershed.

## **BACKGROUND**

In a letter dated February 19, 2020, the Corps verified the delineation of aquatic resources confirming that the 72.81-acre project site contains 53.35 acres of upland and 14.72 acre of wetland. By letter dated May 7 2020, the Corps verified the use of Nationwide Permits 14 and 39 for impacts to 1.208 acre of wetland for the installation of infrastructure (roads and utilities), construction of a single building on the northwestern portion of the property and construction of a large parking area on the eastern portion of the property.

This Joint Public Notice announces a request for authorizations from both the Corps 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. The applicant must request a meeting with EPD at least 30 days prior to any request they make for 401 Water Quality Certification

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: A Phase 1 Cultural Resources Survey was completed in April 2020 by Brockington Cultural Resources Consulting to evaluate three previously identified archeological sites. The Corps will review and coordinate this report with coordinate this report to fulfill its Section 106 responsibilities.

Endangered Species: A preliminary review of the U.S. Fish and Wildlife Service (FWS) Information for Planning and Consultation (IPaC) list of Endangered and Threatened Species indicates the following listed species may occur in the project area: Eastern black rail (*Laterallus jamaicensis spp. jamaicensis*); wood stork (*Mycteria americana*); Eastern indigo snake (*Drymarchon corais couperi*); frosted flatwoods salamander (*Ambystoma cingulatum*); and pondberry (*Lindera melissifolia*). Per the Effects Determination Guidance for Endangered and Threatened Species (EDGES), the Corps has determined that the proposed project may affect, but is not likely to adversely affect the wood stork and Eastern indigo snake.

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.

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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 Section 10/Section 404 permit should submit comments by email to [skye.h.stockel@usace.army.mil](mailto: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 Branch at [skye.h.stockel@usace.army.mil](mailto:skye.h.stockel@usace.army.mil) or (912) 652-5690.

Enclosures:

1. Project Application and Description
2. Vicinity and Location Maps
3. Impact Drawings
4. Alternative Analysis Figures
5. Mitigation Worksheets



18 August 2020

U.S. Army Corps of Engineers  
Savannah District  
Attn: Mr. Bill Rutlin  
100 West Oglethorpe Ave  
Savannah, GA 31402-0889

**RE: Kahn Tract  
Chatham County, Georgia  
USACE Project No. SAS-2020-00054**

**RLC#: 19-314.2**

Dear Mr. Rutlin:

Resource & Land Consultants, on behalf of CenterPoint Properties, is submitting the attached information requesting an Approved Jurisdictional Determination (AJD) for the Kahn Tract. The project site is located adjacent to and east of Dean Forrest Road and north of Pipemakers Canal within Garden City, Chatham County Georgia (32.108927°, -81.191608°). Based on a previously issued jurisdictional determination and Nationwide Permit Concurrence dated 19 February 2020, the 72.81 acre project site contains 19.46 acres of wetland. Based on the recently issued Navigable Waters Protection Rule, we are requesting verification that Wetland B, Wetland C and Wetland E depicted on the survey are not jurisdictional and that the project site contains 4.74 acres of non-jurisdictional wetland and 14.72 acres of jurisdictional wetland.

In addition to the AJD, please find attached a Section 404 Individual Permit Application requesting authorization for unavoidable wetland impacts required to facilitate expansion of the existing industrial park. Based on the AJD request above, this application includes 1.399 acres of jurisdictional wetland impact for building and parking construction. As compensatory mitigation for the proposed impacts, the applicant will purchase 8.4 grandfathered wetland credits from a U.S. Army Corps of Engineers mitigation bank within the Primary (Savannah) Service Area.

For your review and use, the attached package includes the following information:

- Project Description
- Determination Request Form & Approved Jurisdictional Determination Form
- CESAS Form 19
- Previous USACE Authorizations (JD & NWP Concurrence)
- Figures/Site Maps
- 2020 Wetland Exhibit depicting NWPR jurisdictional and non-jurisdictional wetlands
- Site Photographs
- Permit Drawings
- Off-Site Alternative Information
- On-Site Configurations
- Compensatory Mitigation Calculations
- Adjacent Land Owner Information
- Threatened & Endangered Species Information
- Cultural Resources Information

We greatly appreciate your assistance with this project. If you have any questions or require additional information, please do not hesitate to contact us at (912) 443-5896.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alton Brown, Jr.', with a stylized, flowing script.

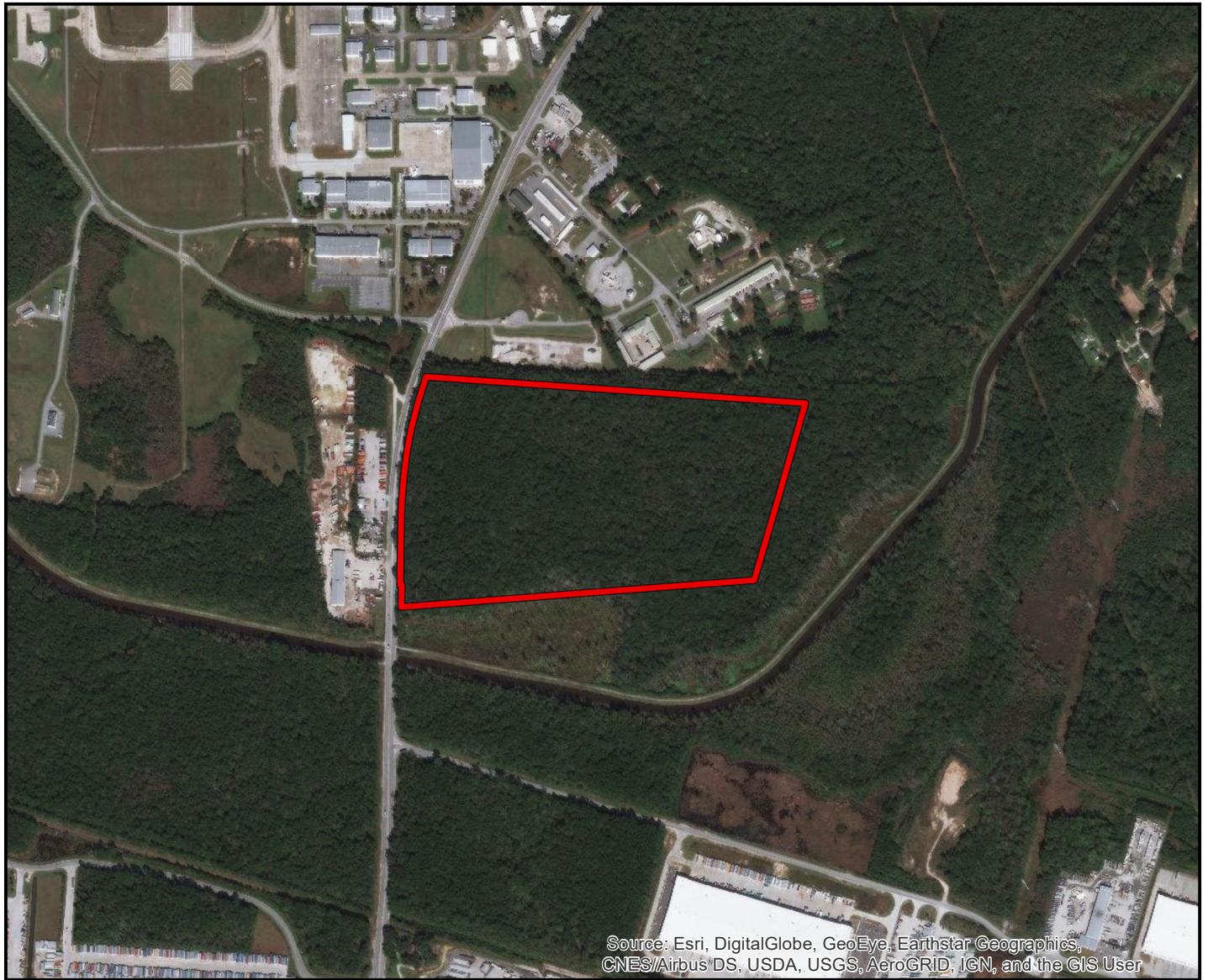
Alton Brown, Jr.  
Principal  
Resource & Land Consultants

Enclosures

cc: Mr. Brian Hollings – CenterPoint Properties  
Mr. Stan Fischer – Thomas & Hutton  
Mr. Bradley Smith – GADNR-EPD



# U.S. Army Corps of Engineers Section 404 Permit Application



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics,  
CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User

Kahn Tract  
Chatham County, Georgia

# Kahn Tract Chatham County, Georgia

Individual Permit Application  
August 2020

APPLICANT: CENTERPOINT PROPERTIES  
AGENT: RESOURCE & LAND CONSULTANTS  
ENGINEER: THOMAS & HUTTON



RESOURCE+LAND  
CONSULTANTS



Engineering | Surveying | Planning | GIS | Consulting



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## APPENDIX:

- A: Determination Request Form & Approved Jurisdictional Determination Form
- B: CESAS Form 19
- C: Previous USACE Authorizations (JD & NWP Concurrence)
- D: Figures/Site Maps
- E: 2020 Wetland Exhibit
- F: Site Photographs
- G: Permit Drawings
- H: Off-Site Alternative Information
- I: On-Site Configuration
- J: Compensatory Mitigation Calculations
- K: Adjacent Landowner Information
- L: Threatened & Endangered Species
- M: Cultural Resources

**Kahn Tract Facility Expansion**  
**CenterPoint Properties**  
**Project Description**  
**SAS-2020-00054**  
**August 2020**

**1.0 INTRODUCTION:**

CenterPoint Properties is seeking authorization to impact 1.40 acres of jurisdictional wetland to facilitate expansion of an industrial facility located on the Kahn Tract. The project site totals 72.81 acres located adjacent to and west of Dean Forest Road and north of Pipemakers Canal within Chatham County, Georgia (32.108927°, -81.191608°).

**2.0 BACKGROUND/PROJECT HISTORY:**

The property was previously owned by Chatham County and early this year, the property was purchased by CenterPoint. In a letter dated 19 February 2020, the U.S. Army Corps of Engineers (USACE) issued a jurisdictional determination confirming that the 72.81-acre project site contains 53.35 acres of upland. In addition, the site contains five wetland areas totaling 19.46 acres of which 14.72 acres are jurisdictional per the Navigable Waters Protection Rule. Following acquisition of the property, CenterPoint designed a site plan that included installation of infrastructure (roads and utilities), construction of a single building on the northwestern portion of the property and construction of a large parking area on the eastern portion of the property. In a letter dated 7 May 2020, the USACE issued Nationwide Permit (NWP) Concurrence for impacts associated with this site plan. Since that time and due to the project site's proximity to the Port of Savannah (3.2 miles from port with direct access down Dean Forest Road), the current warehouse has already leased out and expansion is required.

**3.0 PROJECT PURPOSE:**

The purpose of the proposed project is to obtain a permit from the USACE authorizing jurisdictional wetland impacts required for expansion of the existing facility and construction of an additional building.

**4.0 EXISTING SITE CONDITIONS:**

The Kahn Tract totals 72.81 acres and contains 19.46 acres of wetland (jurisdictional and non-jurisdictional) and 53.35 acres of upland. The upland areas contain a mature overstory of mixed pine hardwood habitat. This area is dominated by loblolly pine (*Pinus taeda*), sweet gum (*Liquidambar styraciflua*), live oak (*Quercus virginiana*), wax myrtle (*Myrica cerifera*), bracken fern (*Pteridium aquilinum*), etc. The wetland habitats include slope wetland systems and depressional wetland areas. The slope wetland systems contain swamp chestnut oak (*Quercus machauxii*), sweet gum, red maple (*Acer rubrum*), swamp tupelo (*Nyssa biflora*), red bay (*Persea borbonia*), water oak (*Quercus nigra*), greenbrier (*Smilax rotundifolia*), Virginia chain-fern (*Woodwardia virginica*), netted chain-fern (*Woodwardia aerolata*), royal fern (*Osmunda regalis*), and blackberry (*Rubus spp.*). The wetland areas have been impacted by the construction of a stormwater ditch north of the site and Pipemakers Canal south of the site. Photographs of the project site are provided in Appendix F.

**5.0 PROPOSED PROJECT:**

The existing approved project includes an entrance road providing access to a 325,500 square foot building on the north side of the road and a 14.95-acre parking area designed to accommodate 250 trailers on the eastern portion of the site. The proposed project will include expansion of the facility and construction of an additional 325,500 square foot building south of the entrance road with employee parking, truck parking and truck docking.

**6.0 ALTERNATIVE ANALYSIS/AVOIDANCE & MINIMIZATION:**

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 to fulfill the basic purpose of the proposed activity may be considered.”

Considering the guidelines above, the applicant evaluated a no action alternative, five alternative sites including the applicant’s preferred site, and three on-site configurations including the applicant’s preferred on-site configuration. Drawings depicting the proposed site plan are provided in Appendix G, off-site alternatives are provided in Appendix H and on-site alternatives are provided in Appendix I. As part of this alternative evaluation, the following “Practicability/Reasonability Screening Selection Criteria” were applied to each alternative to confirm whether the particular alternative and/or on-site configuration was practicable.

- **Geographic Location:** The proposed project includes expansion of an industrial facility. For this reason, off-site alternatives were limited to properties that adjoin the existing facility.
- **Size:** Due to the size of the proposed facility, the minimum tract size needed to support the proposed project was approximately 15 acres of contiguous land to accommodate a 325,500 square foot building, parking, stormwater, etc.
- **Zoning:** Land use restrictions associated with current zoning are a major consideration in all industrial projects. Truck traffic, equipment operation, adjoining land use, buffers, etc. make the location of the project and the current zoning a critical component. For this site screening criterion, tracts that are currently zoned for the intended use or that could be reasonably re-zoned to accommodate the proposed project were considered.
- **Utilities:** With any development project, utility services or access to utility services (water, sewer, electrical, gas, phone, cable, etc.) are required. For this reason, location of existing utilities and cost associated with servicing the project site if those utilities were not already available was a consideration in the site screening criteria.
- **Access:** Access to an industrial site of this size requires continual operation of large trucks and trailers and suitable paved road access that can support heavy truck traffic (semi-trailer truck) was required.
- **Availability:** Sites listed for sale and known to be available for purchase were considered as part of the alternatives analysis.

The following provides a summary of the alternative analysis and a description of each alternative evaluated as part of this permit application package.

**6.1 No Action Alternative:** A “no action” alternative must be considered, and complete avoidance of wetlands was the first alternative considered for this project. The proposed project has been initiated to facilitate expansion of an existing industrial development and to create additional warehousing and distribution space. For this reason, a “no action” or no expansion alternative does not meet the project purpose and is not practicable.

**6.2 Off-Site Alternatives:** The following provides a summary of each off-site alternative evaluated for the project.

**6.2.1 Applicant’s Preferred Site/On-Site Configuration:** The applicant’s preferred alternative includes expansion of the existing facility within the Kahn Tract and construction of a new building adjacent to and south of the existing/approved entrance road and building. The following provides a summary of each criterion reviewed for the applicants preferred site:

- The site is located within the Kahn Tract and therefore meets the geographic location requirement.
- The expansion area within the Kahn Tract meets the minimum size criteria for the project.
- The site is currently zoned for the intended use.
- The site currently contains the utilities required to service the proposed project.
- Suitable access to the site is provided via Dean Forest Road.
- The site is currently owned by the applicant and therefore is available for development of the proposed project.

In summary, the applicant’s preferred site meets all the site screening criteria and is therefore a practicable alternative.

**6.2.2 Off-Site Alternative 1:** This alternative totals approximately 26.2 acres located adjacent to and south of the Kahn Tract. The following provides a summary of each criterion reviewed for this off-site alternative:

- The site is located adjacent to the Kahn Tract and therefore meets the geographic location requirement.
- The site totals 26.2 acres which meets the minimum size criteria for the project.
- The site is not currently zoned for the intended use, but it is assumed that zoning can be obtained.
- The site is located adjacent to the existing development and required utilities can be extended to service the proposed project.
- Suitable access to the site is provided via Dean Forest Road.
- The site is not for sale, but it is assumed that this parcel could be purchased from the current owner.

In summary, Off-Site Alternative 1 meets all the site screening criteria and is a practicable alternative.

**6.2.3 Off-Site Alternative 2:** This alternative totals approximately 28.6 acres located adjacent to and east of the Kahn Tract. The following provides a summary of each criterion reviewed for this off-site alternative:

- The site is located adjacent to the Kahn Tract and therefore meets the geographic location requirement.
- The site totals 28.6 acres which meets the minimum size criteria for the project.
- The site is not currently zoned for the intended use, but it is assumed that zoning can be obtained.
- The site is located adjacent to the existing development and required utilities can be extended to service the proposed project.
- Suitable access to the site is provided via Dean Forest Road.
- The site is not for sale, but it is assumed that this parcel could be purchased from the current owner.

In summary, Off-Site Alternative 2 meets all the site screening criteria and is a practicable alternative.

**6.2.4 Off-Site Alternative 3:** This tract totals 72 acres located adjacent to and east of Dean Forest Road and north of the Kahn Tract. The following provides a summary of each criterion reviewed for this off-site alternative:

- The site is located adjacent to the Kahn Tract and therefore meets the geographic location requirement.
- The site totals 72 acres which meets the minimum size criteria for the project.
- The site is not currently zoned for the intended use, but it is assumed that zoning can be obtained.
- The site is currently developed and contains utilities to service the proposed project.
- Suitable access to the site is provided via Dean Forest Road.
- The site is not for sale, is owned by the Airport Commission, contains existing development and cannot be purchased for expansion of the proposed project.

In summary, Off-Site Alternative 3 does not meet all the site screening criteria and is therefore not a practicable alternative.

**6.2.5 Off-Site Alternative 4:** This site consists of several tracts totaling approximately 90 acres on the west side of Dean Forest Road north of Pipemakers Canal and south of the Airport. The following provides a summary of each criterion reviewed for this off-site alternative:

- This site is not located adjacent to the Kahn Tract but rather across Dean Forest Road. This site would not support an expansion project and would require construction of an independent standalone project. Thus, this site does not meet the geographic location requirement.
- The site totals 90 acres which meets the minimum size criteria for the project.
- The site is not currently zoned for the intended use, but it is assumed that zoning can be obtained.
- The site is currently developed and contains utilities to service the proposed project.
- Suitable access to the site is provided via Dean Forest Road.
- The site is not for sale, consists of multiple tracts owned by different companies, contains existing development and cannot be purchased for expansion of the proposed project.

In summary, Off-Site Alternative 4 does not meet all the site screening criteria and is therefore not a practicable

alternative.

**6.2.6 On-Site Configuration 1:** Because this alternative is located within the applicant's preferred alternative site, the on-site configuration meets the site screening criteria and is determined to be practicable.

**6.3 Alternatives Not Practicable or Reasonable:** Following review of both off-site alternatives and on-site configurations, the applicant completed a comparison of alternatives to practicability and reasonability screening criteria. Table 1 below summarizes a comparison of each alternative discussed above to the screening criteria for practicability and reasonableness.

**Table 1. Summary Table for Practicability and Reasonableness Screening Selection Criteria**

Practicability/ Reasonability Screening Selection Criteria	Applicant's Preferred Site/On-Site Configuration	Alt 1	Alt2	Alt 3	Alt 4	On-Site Configuration 1	No Action
Geographic Location	Yes	Yes	Yes	Yes	No	Yes	No
Size	Yes	Yes	Yes	Yes	Yes	Yes	No
Zoning	Yes	Yes	Yes	Yes	Yes	Yes	No
Utilities	Yes	Yes	Yes	Yes	Yes	Yes	No
Access	Yes	Yes	Yes	Yes	Yes	Yes	No
Availability	Yes	Yes	Yes	No	No	Yes	No
<b>Practicable Site (Y or N)</b>	Yes	Yes	Yes	No	No	Yes	No

**6.4 Review of Practicable Alternatives:** Following a determination of practicable alternatives using the "Practicability/Reasonability Screening Selection 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 construction of the proposed facility. This evaluation was completed by considering environmental factors which could impact development of the site. The environmental factors included:

- Stream Impacts (quantitative). The estimated 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. A low, medium, or high value was assigned based on current structure and hydrologic conditions. Examples of high value would be stable geomorphology and diverse biological community. Examples of low value would be evidence of full impairment such as extensive culverting, piping, or impoundment within the stream.
- Wetland Impacts (quantitative). The estimated 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. A low, medium, or high value was assigned based on current vegetative structure and hydrologic conditions. Examples of high value would be mature canopy, no evidence of ditching, rare habitats, etc. Examples of low value would be evidence of habitat manipulation through ditching, clear cutting, diking, fragmentation, etc.
- 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. A low, medium, or high value was assigned based on habitat type and condition. Examples of high value would be lakes, impoundments, and/or features occurring naturally. Examples of low value would be man-made features which have not naturalized and provide little to no biological support (i.e. borrow pit).
- 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) Information, Planning, and Conservation System (IPaC) database at <http://ecos.fws.gov/ipac/> database was reviewed to determine plant and animal species as endangered or threatened for each alternative.
- Cultural Resources. A preliminary assessment of cultural resources was conducted for each site by reviewing available State Historic Preservation Office information at <http://www.nr.nps.gov/>. Potential impacts to sites listed or eligible for listing on the National Register of Historic Places was noted for each alternative.
- Stream Buffer Impact. The estimated linear footage of potential stream buffer impact was evaluated for each practicable alternative.
- Flood Plain Impacts. The estimated acreage of flood plain impact was evaluated for each practicable alternative.

Considering the assessment criteria above, the applicant evaluated nine alternatives consisting of five alternative sites (including the applicant's preferred site) and three on-site configurations (including the applicant's preferred on-site configuration). The following provides a summary of each practicable alternative and associated environmental impacts.

**6.4.1 Applicant's Preferred Alternative/On-site Configuration:** As discussed above, the existing approved project includes an entrance road providing access to a 325,500 square foot building on the north side of the road and a 14.95 acre parking area designed to accommodate 250 trailers on the eastern portion of the site. The proposed development will include expansion of the facility and construction of an additional 325,500 square foot building south of the entrance road with employee parking, truck parking and truck docking.

- Stream Impacts (quantitative). The proposed project will not require stream impact.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). 1.399 acres of jurisdictional wetland impact would be required for the preferred alternative site and on-site configuration.
- Wetland Function (qualitative). Field review of existing site conditions documented that the historic limits of the wetlands have been impacted by Pipemakers Canal. The functional value of the wetland areas proposed for impact was assigned a medium value.
- Impacts to Other Waters (quantitative). No other waters impact is associated with this alternative.
- Other Waters Functions (qualitative). Not applicable.
- Federally Listed Threatened or Endangered Species. An intensive threatened and endangered species survey has been

completed within the project site. Based on the data provided in Appendix L and the information documented in Section 7.0 below, no adverse impacts to protected species will occur in association with the proposed project.

- Cultural Resources. A preliminary assessment of cultural resources was conducted for each site by reviewing available State Historic Preservation Office information at <http://www.nr.nps.gov/>. Potential impacts to sites listed or eligible for listing on the National Register of Historic Places was noted for each alternative.
- Stream Buffer Impact. The proposed project does not require impacts to state waters and stream buffers.
- Floodplain Impacts. Approximately 3 acres flood plain impact is associated with this alternative.

**6.4.2 Off-Site Alternative 1:** This alternative totals 26.2 acres located south of the Kahn Tract, adjacent to and east of Dean Forest Road and adjacent to and north of Pipemakers Canal. This alternative was evaluated to determine environmental impacts associated with construction of a 325,500 square foot building, truck parking, employee parking and stormwater detention. Access and utilities would be extended from the Kahn Tract or from Dean Forest Road to this site.

- Stream Impacts (quantitative). The proposed project will not require stream impact.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). Field review of this alternative documented that the entire site is wetland. For this reason, a minimum of 20 acres of wetland impact would be required.
- Wetland Function (qualitative). Wetlands within this tract have been altered by Pipemakers Canal and due to extended inundation, canopy trees within portions of this site have been impacted. For this reason, the functional value of the wetland areas proposed for impact was assigned a medium value.
- Impacts to Other Waters (quantitative). No other waters impact is associated with this alternative.
- Other Waters Functions (qualitative). Not applicable.
- Federally Listed Threatened or Endangered Species. A review of the U.S. Fish and Wildlife Information for Planning and Consultation (IPaC) was conducted and this data indicates that no impacts to federally listed species are known to occur within this site. Based on location of the tract and site conditions, no adverse impacts to federally listed threatened and endangered species would be expected.
- Cultural Resources. A review of the information publicly available on GNAHRGIS database indicates that the property does not contain any cultural or archaeological sites. For this reason, impacts to sites listed or eligible for listing on the national register are not anticipated.
- Stream Buffer Impact. The proposed project does not require impacts to state waters and stream buffers.
- Floodplain Impacts. All 26.2 acres associated with this project are located within the floodplain and a minimum of 20 acres of floodplain impact would be required.

**6.4.3 Off-Site Alternative 2:** This alternative totals 28.6 acres located east of the Kahn Tract and adjacent to and west of Pipemakers Canal. This alternative was evaluated to determine environmental impacts associated with construction of a 325,500 square foot building, truck parking, employee parking and stormwater detention. Access and utilities would be extended from the Kahn Tract to this site.

- Stream Impacts (quantitative). The proposed project will not require stream impact.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). Field review of this alternative documented that the entire site is wetland. For this reason, a minimum of 20 acres of wetland impact would be required.



- Wetland Function (qualitative). Wetlands within this tract have been altered by Pipemakers Canal and due to extended inundation, canopy trees within portions of this site have been impacted. For this reason, the functional value of the wetland areas proposed for impact was assigned a medium value.
- Impacts to Other Waters (quantitative). No other waters impact is associated with this alternative.
- Other Waters Functions (qualitative). Not applicable.
- Federally Listed Threatened or Endangered Species. A review of the U.S. Fish and Wildlife Information for Planning and Consultation (IPaC) was conducted and this data indicates that no impacts to federally listed species are known to occur within this site. Based on location of the tract and site conditions, no adverse impacts to federally listed threatened and endangered species would be expected.
- Cultural Resources. A review of the information publicly available on GNAHRGIS database indicates that the property does not contain any cultural or archaeological sites. For this reason, impacts to sites listed or eligible for listing on the national register are not anticipated.

Stream Buffer Impact. The proposed project does not require impacts to state waters and stream buffers.

- Floodplain Impacts. All 28.62 acres associated with this alternative are located within the floodplain and a minimum of 20 acres of floodplain impact would be required.

**6.4.4 On-Site Configuration 1:** This proposal includes construction of three buildings totaling 854,000 square feet, employee parking, truck parking and stormwater detention on the eastern portion of the property.

- Stream Impacts (quantitative). The proposed project will not require stream impact.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). 14.72 acres of wetland impact would be required for this alternative. While the footprint of building and parking would impact portions of the wetland area, all remaining property, including wetland would be impacted by floodplain mitigation and stormwater management pond construction.
- Wetland Function (qualitative). Field review of existing site conditions documented that the historic limits of the wetlands have been impacted by past land management practices including installation of roads, installation of drainage ditches, and timber harvesting. The functional value of the wetland areas proposed for impact was assigned a medium value.
- Impacts to Other Waters (quantitative). No other waters impact is associated with this alternative.
- Other Waters Functions (qualitative). Not applicable.
- Federally Listed Threatened or Endangered Species. An intensive threatened and endangered species survey has been completed within the project site. Based on the data provided in Appendix L and the information documented in Section 7.0 below, no adverse impacts to protected species will occur in association with the proposed project.
- Cultural Resources. A preliminary assessment of cultural resources was conducted for each site by reviewing available State Historic Preservation Office information at <http://www.nr.nps.gov/>. Potential impacts to sites listed or eligible for listing on the National Register of Historic Places was noted for each alternative.
- Stream Buffer Impact. The proposed project does not require impacts to state waters and stream buffers.
- Floodplain Impacts. Approximately of 17 acres of floodplain impact would be required for development of On-Site Configuration 1.

**6.5 Summary of Alternatives Analysis:** When comparing the practicable alternatives, the Applicant's Preferred Alternative requires less wetlands, open water, floodplain impact than alternative sites and when considering environmental impacts, the Applicant's Preferred Alternative represents the least environmentally damaging. Table 2 provides a summary of the practicable alternatives and the values for each factor.

**Table 2. Summary of Least Environmentally Damaging Practicable Alternative Assessment**

FACTORS	Preferred Alternative & Configuration	Off-Site Alternative 1	Off-Site Alternative 2	On-Site Conf 1
<b>Environmental Factors</b>				
Stream Impacts (Linear Feet)	None	None	None	None
Functional Value of Impacted Stream	N/A	N/A	N/A	N/A
Jurisdictional Wetland Impacts (Acres)	1.399	20 ac	20 ac	14.72 ac
Functional Value of Impacted Wetland	Medium	Medium	Medium	Medium
Impacts to Other Waters (Acres)	None	None	None	None
Functional Value of Impacted Other Waters	N/A	N/A	N/A	N/A
Federal Endangered Species Impact	No	No	No	No
Cultural Resources Impact	No	No	No	No
Stream Buffer Impact	No	No	No	No
Floodplain Impact	3 ac	20 ac	20 ac	18 ac
<b>LEDPA</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>

In summary, the applicant and design team considered a variety of alternatives which would avoid and minimize impacts to wetlands to the greatest extent practicable while satisfying the overall project purpose. Through a comprehensive analysis of both off-site alternatives and on-site configurations, the applicant has been able to reduce the overall environmental impacts and demonstrate that the proposed site and design is the least environmentally damaging practicable alternative.

#### **7.0 THREATENED & ENDANGERED SPECIES:**

RLC completed a threatened and endangered species assessment within the project site. Prior to conducting the field survey, RLC reviewed available state and federal records to determine if any listed species were known to occur within and/or in the general vicinity of the project area. Available resources such as aerial photographs, U.S. Geological Survey topographic maps, National Wetlands Inventory maps, and the Natural Resource Conservation Service Soil Survey were examined to complete a preliminary determination of existing habitats prior to the field visit. A review of the U.S. Fish and Wildlife Service's Information, Planning, and Conservation System was also conducted to identify species that are known to occur within Chatham County, Georgia. Following review of available information, RLC conducted a pedestrian survey of the project site to determine the available habitats on site and the potential occurrence for listed species. Pedestrian surveys were conducted in May 2020. At no time during the survey was a listed species or critical habitat associated with a listed species observed. Based on observations during the site visit, existing habitats documented within the site, absence of listed species and geographic location of the project, no adverse impacts to protected species will occur in association with the proposed project.

#### **8.0 CULTURAL RESOURCES:**

Brockington & Associates completed a Phase I Cultural Resources Survey for the project site. A complete copy of the report can be found in Appendix M. Based on the survey and as noted in the management summary, the proposed industrial development will not impact any cultural resources eligible for listing on National Register of Historic Places.

#### **9.0 STORM WATER MANAGEMENT:**

A preliminary stormwater management plan has been designed by Thomas & Hutton (consulting engineer), and although this plan has not yet been finalized, it includes construction of stormwater ponds designed to accommodate the stormwater volume associated with development of the site. The final plan will meet any and all stormwater management requirements of the local authorities. It should be noted that construction of stormwater management facilities will occur within uplands only and impacts to jurisdictional waters of the U.S. and/or wetlands will not be required.

**10.0 COMPENSATORY MITIGATION:**

Using the current Savannah District Standard Operating Procedure for Compensatory Mitigation, SOP calculations indicate that 8.40 grandfathered wetland credits are required to compensate for the 1.399 acres of jurisdictional wetland impacts. Credits will be acquired from a primary service area mitigation bank that services the Lower Savannah watershed. Upon approval of the proposed project and prior to initiation of authorized wetland impacts, the applicant will provide documentation of credit conveyance to the USACE.

**APPENDIX B:**  
CESAS Form 19

JOINT APPLICATION  
FOR  
A DEPARTMENT OF THE ARMY, CORPS OF ENGINEERS PERMIT,  
STATE OF GEORGIA MARSHLAND PROTECTION PERMIT,  
REVOCABLE LICENSE AGREEMENT  
AND REQUEST FOR  
WATER QUALITY CERTIFICATION  
AS APPLICABLE

INSTRUCTIONS FOR SUBMITTING APPLICATION:

Every Applicant is Responsible to Complete The Permit Application and Submit as Follows: One copy each of application, location map, drawings, copy of deed and any other supporting information to addresses 1, 2, and 3 below. If water quality certification is required, send only application, location map and drawing to address No. 4.

1. For Department of the Army Permit, mail to: Commander, U.S. Army Engineer District, Savannah ATTN: CESAS-OP-F, P.O. Box 889, Savannah, Georgia 31402-0889. Phone (912)652-5347 and/or toll free, Nationwide 1-800-448-2402.

2. For State Permit - State of Georgia (six coastal counties only) mail to: Habitat Management Program, Coastal Resources Division, Georgia Department of Natural Resources, 1 Conservation Way, Brunswick, Georgia 31523. Phone (912) 264-7218.

3. For Revocable License - State of Georgia (six coastal counties plus Effingham, Long, Wayne, Brantley and Charlton counties only) - Request must have State of Georgia's assent or a waiver authorizing the use of State owned lands. All applications for dock permits in the coastal counties, or for docks located in tidally influenced waters in the counties listed above need to be submitted to Real Estate Unit. In addition to instructions above, you must send two signed form letters regarding revocable license agreement to: Ecological Services Coastal Resources Division, Georgia Department of Natural Resources, 1 Conservation Way, Brunswick, Georgia 31523. Phone (912) 264-7218.

4. For Water Quality Certification State of Georgia, mail to: Water Protection Branch, Environmental Protection Division, Georgia Department of Natural Resources, 4220 International Parkway, Suite 101, Atlanta, Georgia 30354 (404) 675-1631.

The application must be signed by the person authorized to undertake the proposed activity. The applicant must be the owner of the property or be the lessee or have the authority to perform the activity requested. Evidence of the above may be furnished by copy of the deed or other instrument as may be appropriate. The application may be signed by a duly authorized agent if accompanied by a statement from the applicant designating the agent. See item 6, page 2.

1. Application No. \_\_\_\_\_

2. Date \_\_\_\_\_

3. For Official Use Only \_\_\_\_\_

4. Name and address of applicant.  
CenterPoint Properties  
Attn: Mr. Brian Hollings  
250 Pehle Avenue, Suite 410  
Saddle Brook, NJ 07663  
757-630-7474

5. Location where the proposed activity exists or will occur.

Lat. 32.108927° Long. -81.191608°

<u>Chatham</u>	<u>Garden City</u>
County	In City or Town
Military District	
Near City or Town	Subdivision
Lot No.	
Georgia	
Lot Size	Approximate Elevation of Lot
State	
<u>Wetland Adjacent to Pipemakers Canal</u>	<u>Savannah River</u>
Name of Waterway	Name of Nearest Creek, River, Sound, Bay or Hammock

13. Has any agency denied approval for the activity described herein or for any activity directly related to the activity described herein? Yes X NO (If "yes", explain).

Note: Items 14 and 15 are to be completed if you want to bulkhead, dredge or fill.

14. Description of operation: (If feasible, this information should be shown on the drawing).

A. Purpose of excavation or fill To facilitate expansion of an approved industrial park.

1. Access channel :	length_____	depth_____	width_____
2. Boat basin :	length_____	depth_____	width_____
3. Fill area : see attached	length_____	depth_____	width_____
4. Other:	length_____	depth_____	width_____

B. 1.If bulkhead, give dimensions N/A

2.Type of bulkhead construction (material) N/A

Backfill required: Yes \_\_\_\_\_ No \_\_\_\_\_ Cubic yards \_\_\_\_\_

Where obtained \_\_\_\_\_

C. Excavated material : N/A

1.Cubic yards \_\_\_\_\_

2.Type of material \_\_\_\_\_

15.Type of construction equipment to be used Mechanized earth-moving/construction equipment

A. Does the area to be excavated include any wetland? Yes \_\_\_\_\_ No X

B. Does the disposal area contain any wetland? Yes \_\_\_\_\_ No X

C. Location of disposal area: N/A

D. Maintenance dredging, estimated amounts, frequency, and disposal sites to be utilized: N/A

E. Will dredged material be entrapped or encased? N/A

F. Will wetlands be crossed in transporting equipment to project site? N/A

G. Present rate of shoreline erosion (if known) N/A

16. WATER QUALITY CERTIFICATION: In some cases, Federal law requires that a Water Quality Certification from the State of Georgia be obtained prior to issuance of a Federal license or permit. Applicability of this requirement to any specific project is determined by the permitting Federal agency. The information requested below is generally sufficient for the Georgia Environmental Protection Division to issue such a certification if required. Any item which is not applicable to a specific project should be so marked. Additional information will be requested if needed.

A. Please submit the following:

1. A plan showing the location and size of any facility, existing or proposed, for handling any sanitary or industrial waste waters generally on your property.

2. A plan of the existing or proposed project and your adjacent property for which permits are being requested.

3. A plan showing the location of all points where petro-chemical products (gasoline, oils, cleaners) used and stored. Any above-ground storage areas must be diked, and there should be no storm drain catch basins within the diked areas. All valving arrangements on any petro-chemical transfer lines should be shown.

4. A contingency plan delineating action to be taken by you in the event of spillage of petro-chemical products or other materials from your operation.

5. Plan and profile drawings showing limits of areas to be dredged, areas to be used for placement of spoil, locations of any dikes to be constructed showing locations of any weir(s), and typical cross sections of the dikes.



B. Please provide the following statements:

1. A statement that all activities will be performed in a manner to minimize turbidity in the stream.
2. A statement that there will be no oils or other pollutants released from the proposed activities which will reach the stream.
3. A statement that all work performed during construction will be done in a manner to prevent interference with any legitimate water uses.

17. Application is hereby made for a permit or permits to authorize the activities described herein, Water Quality Certification from the Georgia Environmental Protection Division is also requested if needed. I certify that I am familiar with the information contained in this application, and that to the best of my knowledge and belief such information is true, complete and accurate. I further certify that I possess the authority to undertake the proposed activities.



Signature of Applicant

18. U.S.C. Section 1001 provides that: Whoever, in any matter within the jurisdiction of any department or agency of the United States, knowingly and willfully falsifies, conceals, or covers up by any trick, scheme, or device a material fact or makes any false, fictitious, or fraudulent statements or representations, or makes or uses false writing or document knowing same to contain any false, fictitious or fraudulent statement or entry, shall be fined no more than \$10,000 or imprisoned not more than 5 years or both.

PRIVACY ACT NOTICE

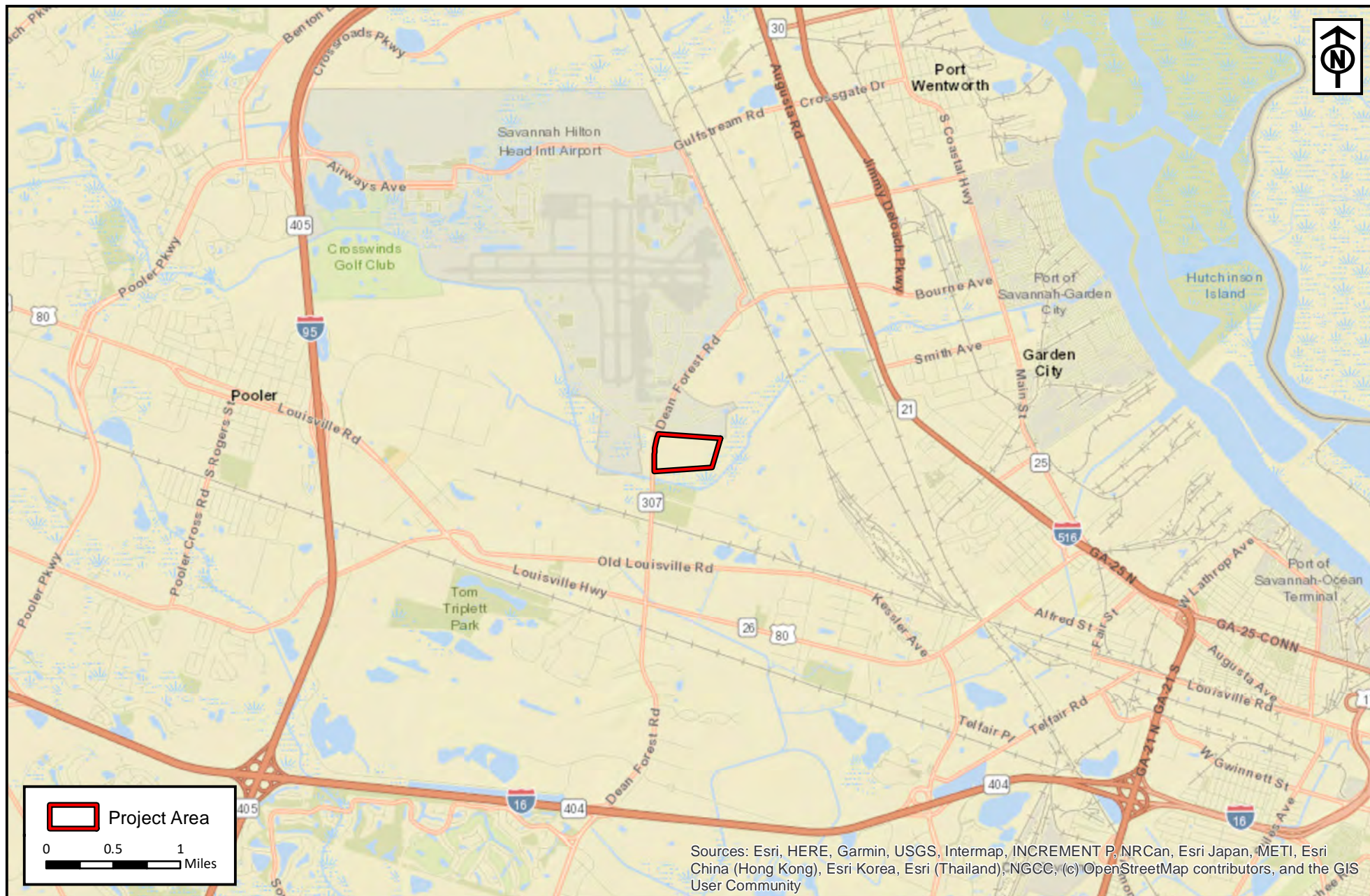
The Department of the Army permit program is authorized by Section 10 of the Rivers and Harbors Act of 1899, Section 404 of the Clean Water Act and Section 103 of the Marine Protection, Research and Sanctuaries Act of 1972. These laws require permits authorizing structures and work in or affecting navigable waters of the United States, the discharge of dredged or fill material into waters of the United States, and the transportation of dredged material for the purpose of dumping it into ocean waters. Information provided will be used in evaluating the application for a permit. Information in the application is made a matter of public record through issuance of a public notice. Disclosure of the information requested is voluntary, however, the data requested are necessary in order to communicate with the applicant and to evaluate the permit application. If necessary information is not provided, the permit application cannot be processed nor can a permit be issued.

SUPPORTING REMARKS:

See Attached.

## **APPENDIX D:**

### Figures/Site Maps



RLC Project No.:	19-314.2
Figure No.:	1
Prepared By:	JP
Sketch Date:	8/11/2020
Map Scale :	1 inch = 1 miles

**Kahn Tract**  
Chatham County, Georgia

**Project Location Map**  
Prepared For: CenterPoint Properties

**RESOURCE+LAND**  
CONSULTANTS

41 Park of Commerce Way, Ste 101  
Savannah, GA 31405  
tel 912.443.5896 fax 912.443.5898





RLC Project No.:	19-314.2
Figure No.:	2
Prepared By:	JP
Sketch Date:	8/11/2020
Map Scale :	1 inch = 400 feet

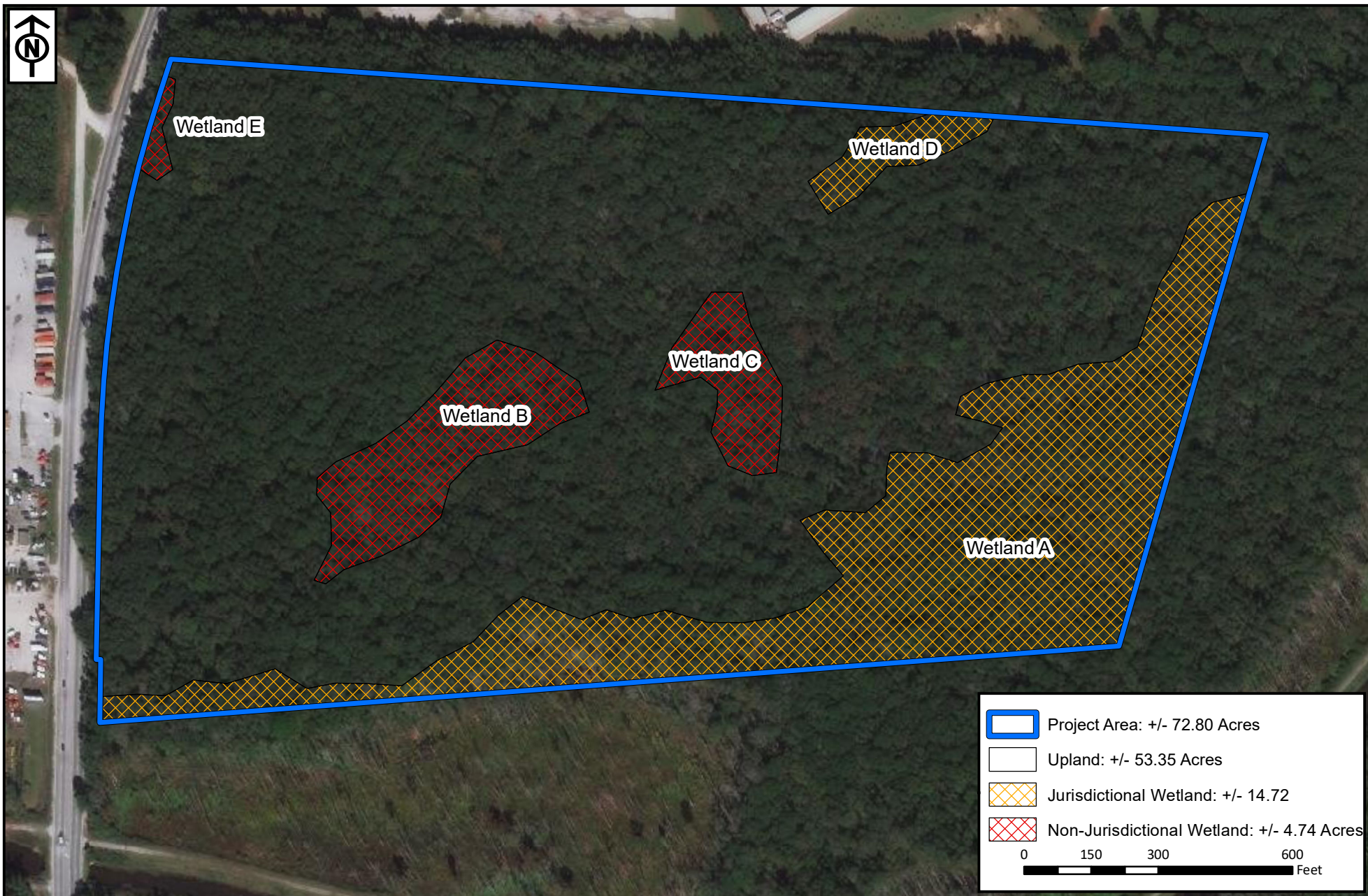
**Kahn Tract**  
Chatham County, Georgia

**2018 NAIP Ortho Aerial**  
Prepared For: CenterPoint Properties

<b>RLC</b>	<b>RESOURCE+LAND</b> <b>CONSULTANTS</b>
	41 Park of Commerce Way, Ste 101
	Savannah, GA 31405
	tel 912.443.5896 fax 912.443.5898

**APPENDIX E:**  
2020 Wetland Exhibit





RLC Project No.: 19-314.2  
 Figure No.: ZM  
 Prepared By: 1  
 Sketch Date: 8/11/2020  
 Map Scale : 1 inch = 300 feet

**Kahn Tract**  
 Chatham County, Georgia

**Wetland Exhibit**  
 Prepared For: Centerpoint Properties

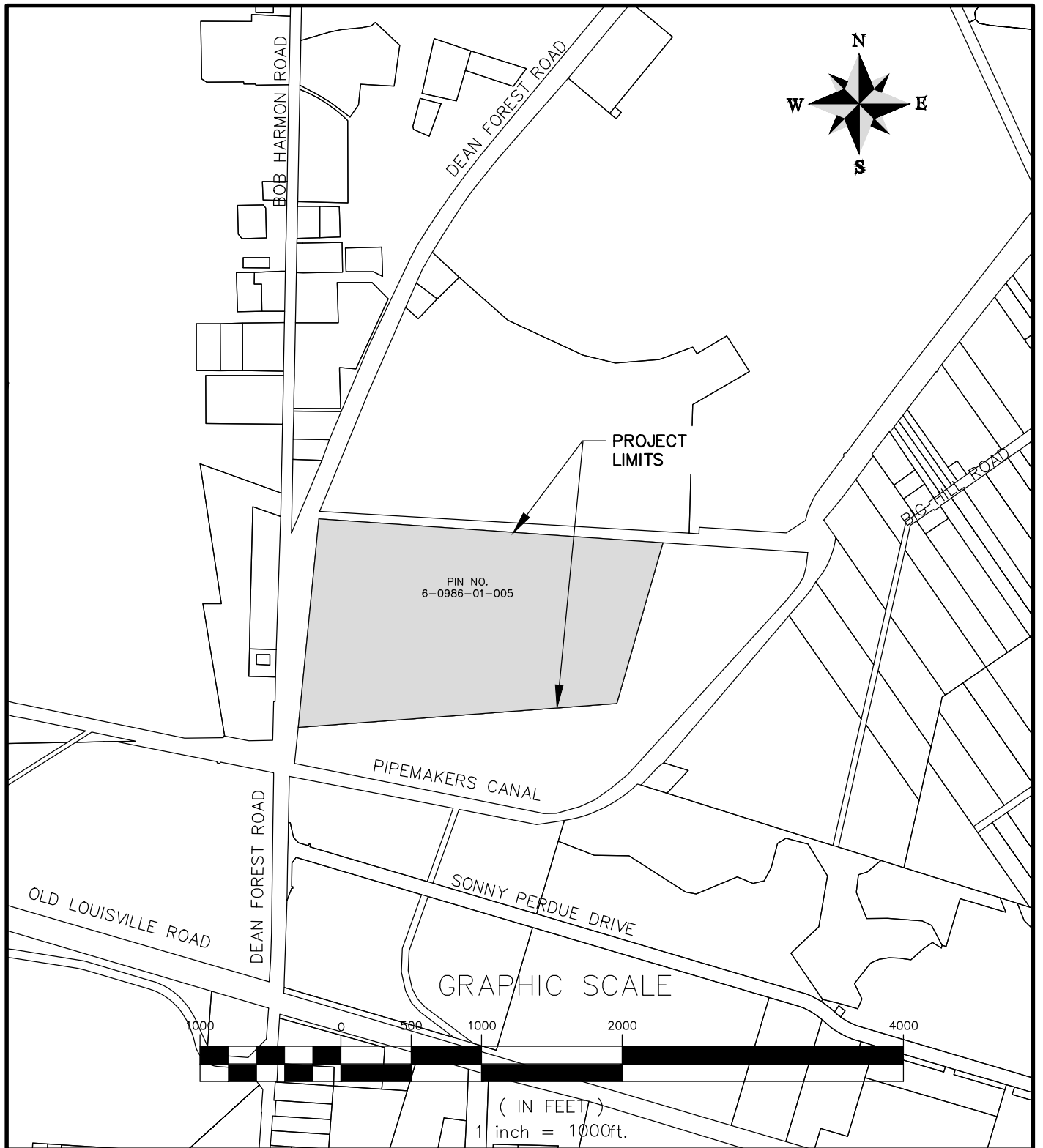


**RESOURCE+LAND**  
 CONSULTANTS  
 41 Park of Commerce Way, Ste 101  
 Savannah, GA 31405  
 tel 912.443.5896 fax 912.443.5898

## **APPENDIX G:**

### Permit Drawings





## FORMER KAHN SITE

PROPOSED ACTIVITY:  
WETLAND PERMIT DRAWINGS

CLIENT:  
CENTERPOINT PROPERTIES

LOCATION: SAVANNAH, GEORGIA

DATE: 8/18/20

JOB NUMBER: J-28219.0000

DRAWN BY: SF

REVIEWED BY: JC

SHEET: W1

SCALE: 1" = 1000'



50 Park of Commerce Way  
Savannah, GA 31405 • 912.234.5300

[www.thomasandhutton.com](http://www.thomasandhutton.com)

BOB HARMON ROAD

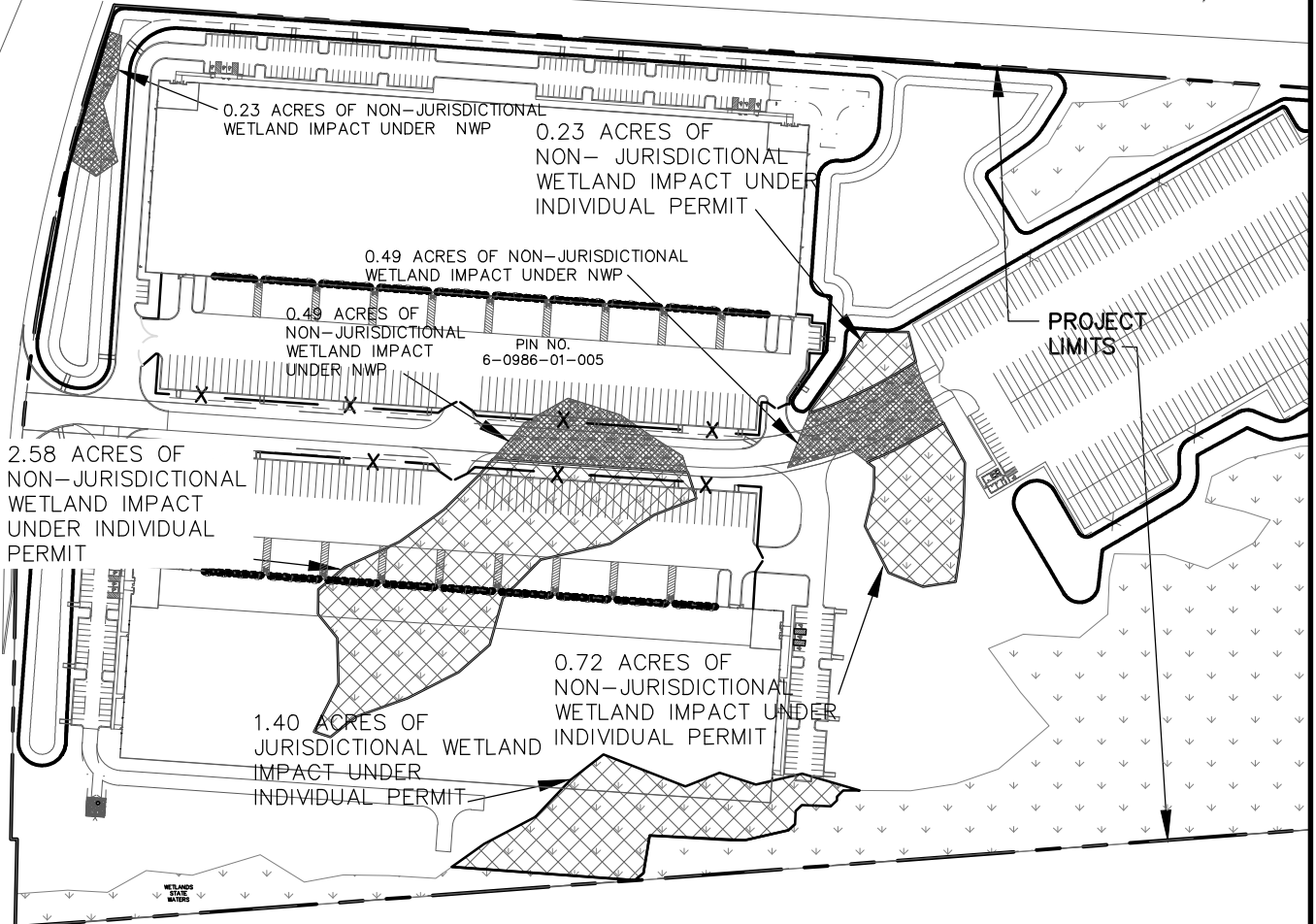
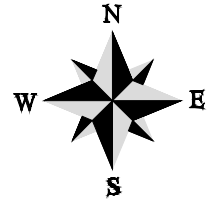
DEAN FOREST ROAD

# SUMMARY

PROJECT AREA -	72.81 AC
UPLAND AREA -	53.35 AC
WETLAND AREA -	19.46 AC
NWP WETLAND IMPACT SAS- 2020-0054	1.21 AC
** NOTE: 1.21 AC WETLAND IMPACTS ASSOCIATED WITH NWP ARE NON-JURISDICTIONAL PER NAVIGABLE WATERS PROTECTION RULE	

## INDIVIDUAL PERMIT WETLAND IMPACT:

JURISDICTIONAL WETLAND IMPACT -	1.4 AC
NON-JURISDICTIONAL WETLAND IMPACT -	4.74 AC
REMAINING UNDISTURBED WETLANDS -	13.32 AC



## FORMER KAHN SITE

PROPOSED ACTIVITY:  
WETLAND PERMIT DRAWINGS

CLIENT:  
CENTERPOINT PROPERTIES

LOCATION: SAVANNAH, GEORGIA

DATE: 8/18/20

JOB NUMBER: J-28219.0000

DRAWN BY: SF

REVIEWED BY: JC

SHEET: W2

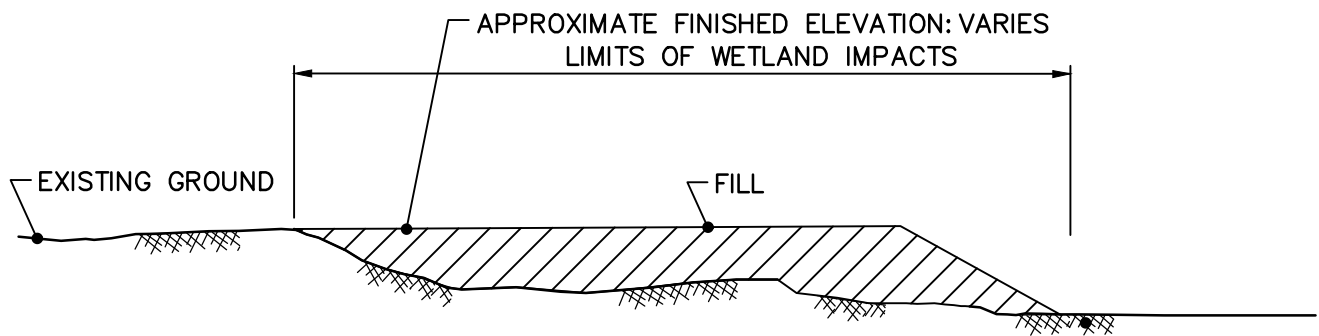
SCALE: 1" = 300'



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ESTIMATED FILL OF JURISDICTIONAL WETLANDS -- 6800 CY



**DEVELOPMENT  
WETLAND FILL SECTION**

NOT TO SCALE

## FORMER KAHN SITE

PROPOSED ACTIVITY:  
WETLAND PERMIT DRAWINGS

CLIENT:  
CENTERPOINT PROPERTIES

LOCATION: SAVANNAH, GEORGIA

DATE: 8/18/20

JOB NUMBER: J-28219.0000

DRAWN BY: SF

REVIEWED BY: JC

SHEET: W3

SCALE: 1" = 20'



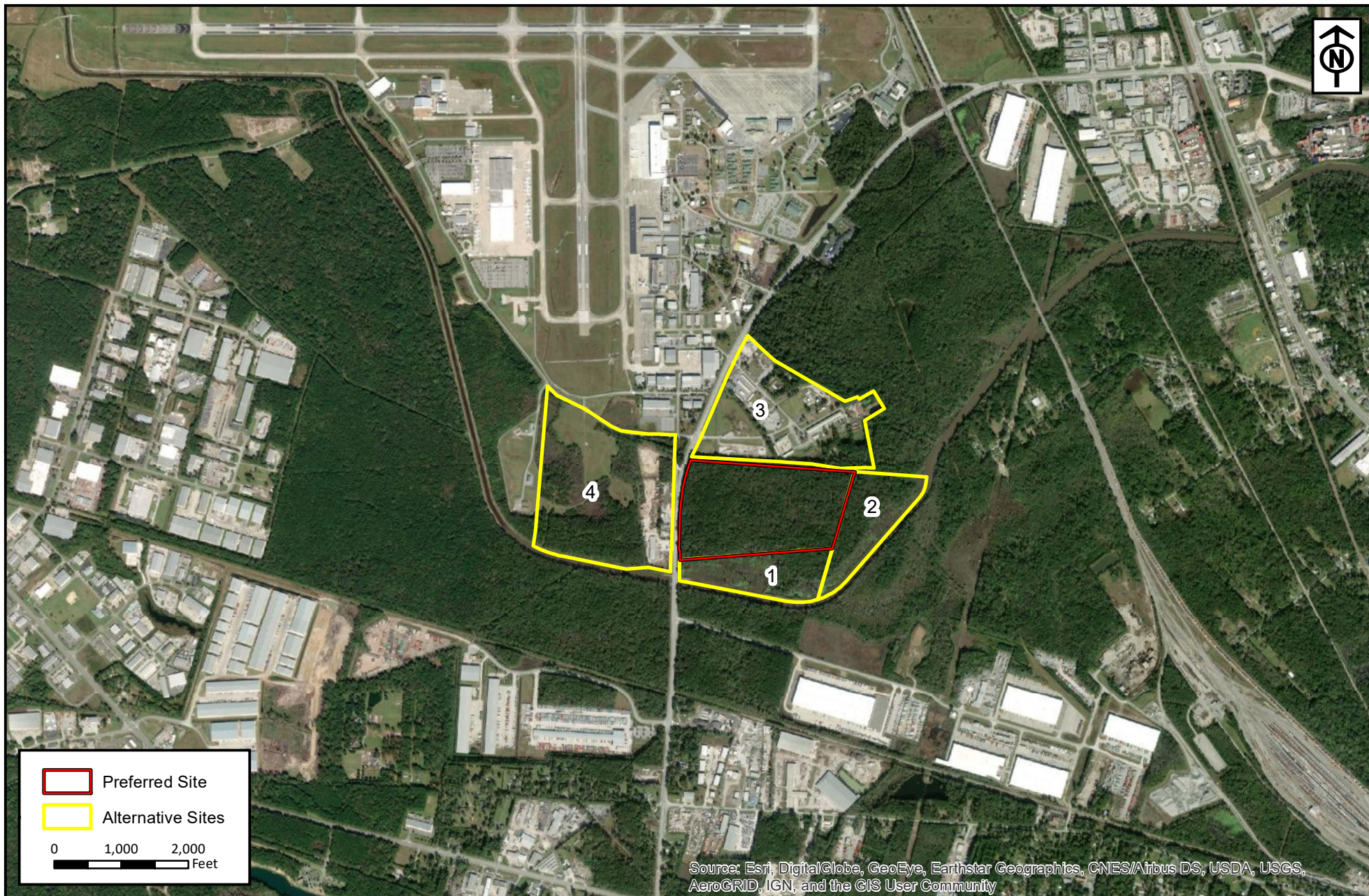
50 Park of Commerce Way  
Savannah, GA 31404 912-234-5300

[www.thomasandhutton.com](http://www.thomasandhutton.com)

## **APPENDIX H:**

### Off-Site Alternative Information





RLC Project No.: 19-314.2  
 Figure No.: 3  
 Prepared By: JP  
 Sketch Date: 8/11/2020  
 Map Scale : 1 inch = 2,000 feet

**Kahn Tract**  
 Chatham County, Georgia

**Off-Site Alternatives**  
 Prepared For: CenterPoint Properties



**RESOURCE+LAND**  
 CONSULTANTS  
 41 Park of Commerce Way, Ste 101  
 Savannah, GA 31405  
 tel 912.443.5896 fax 912.443.5898

**ATTACHMENT I:**  
On-Site Configuration

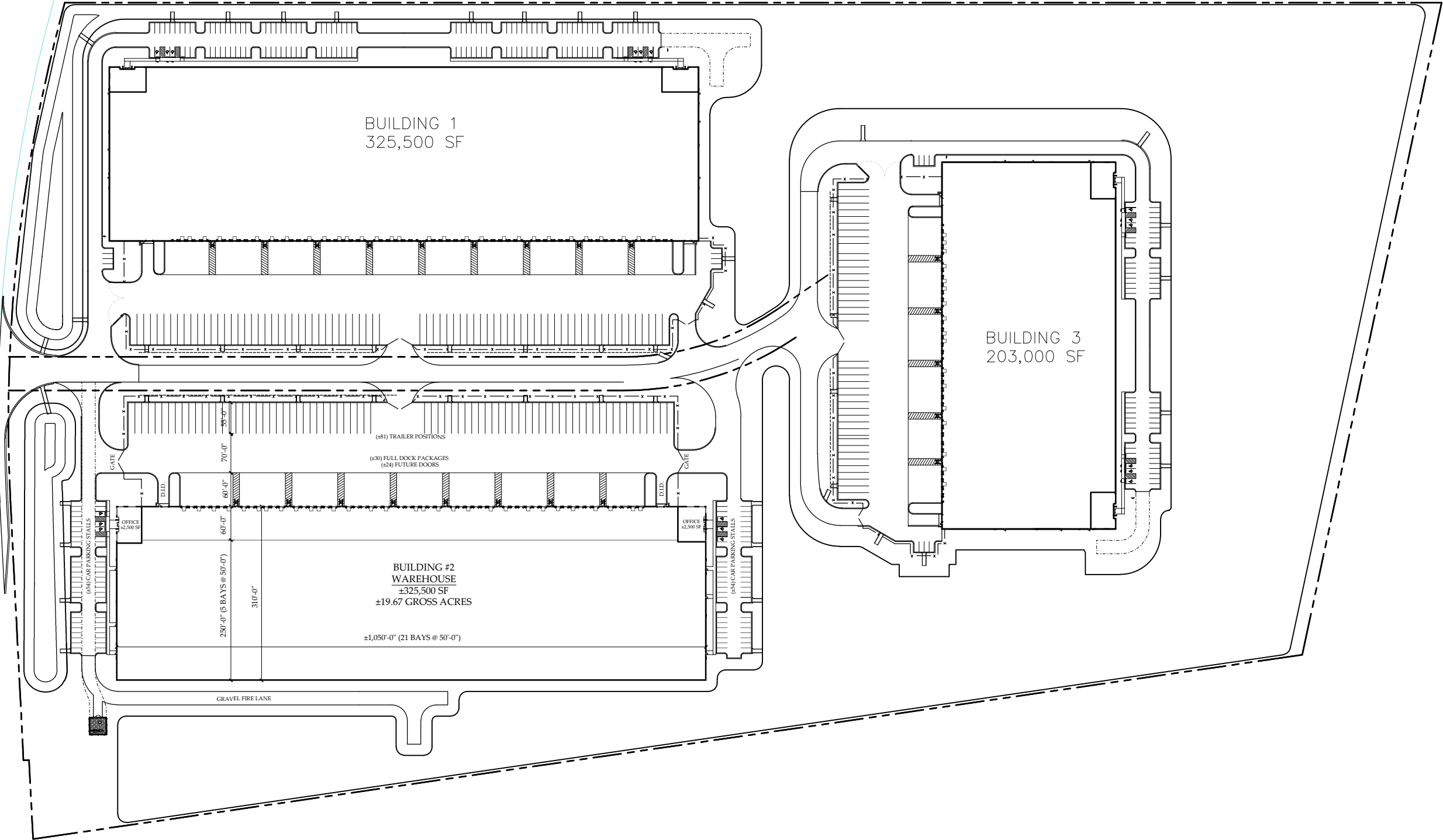


Site Summary Table:

Project Area: 72.81 Acres  
Upland: 53.35 Acres  
Jurisdictional Wetland: 14.72  
Non-Jurisdictional Wetland: 4.74 Acres

Development Summary:

Building Square-Footage: 854,000 sf  
Jurisdictional Impact: 14.72 Acres





## **APPENDIX J:**

### Compensatory Mitigation Calculations

<b>NON-RIVERINE WETLAND QUALITATIVE ASSESSMENT</b>		
Project Name:	Kahn Tract	
Impact Wetland Name:	Jurisdictional Wetland Impact	
Wetland Type:	Slope	
WAA Center Coordinates:		
Date:	8/12/2020	
<b>Water Storage -1</b>		
Answer	<b>Questions</b>	
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)	
Yes	Is the contributing drainage basin at least 50 percent forested? (Y/N)	
FUNCTION SCORE	Moderate	
<b>BioGeoChemical Cycling - 2</b>		
Answer	<b>Questions</b>	
Yes	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	Moderate	
<b>Maintain Characteristic Wetland Community - 3</b>		
Answer	<b>Questions</b>	
Yes	Has the vegetative community been adversely altered within the last 20 years? (Y/N)	
No	Is there greater than 10 percent invasive cover (i.e., cumulative absolute cover across all strata)? (Y/N)	
FUNCTION SCORE	Moderate	
<b>Maintain Faunal Habitat - 4</b>		
Answer	<b>Questions</b>	
Yes	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	Moderate	
<b>WETLAND QUALITATIVE FUNCTIONAL CAPACITY SCORE</b>	<b>Moderate</b>	
<b>Legend</b>		
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.		

Worksheet 1: Qualitative Worksheet for Wetland Adverse Impacts

Project Name:	Kahn Tract
Impact Wetland Name:	Wetland
Acres of Impact (Acres):	1.40
Wetland Type:	Slope Wetlands
Date:	August 12, 2020

**Impact Factors**

	<b><u>Index Description</u></b>	<b><u>Index Value</u></b>
1. Wetland Qualitative Functional Capacity Score ( <u>WQFC</u> )	Moderate	0.75
2. Impact Category Description ( <u>Impact Category</u> )	Discharge of Fill	1.00
3. Product of WQFC and Impact ( <u>WQFC Impact</u> ) =		0.75
4. Duration of Impact ( <u>Duration</u> )	Permanent/Reoccurring	1.00
5. Product of WQFC Impact and Duration ( <u>Total WQFC Impact</u> ) =		0.75
6. Product of Total WQFC Impact and Acres ( <b><u>Total 2018 Wetland Credits Owed</u></b> ) =		1.05
7. Conversion of Total 2018 Wetland Compensation to Grandfathered Credits ( <b><u>Grandfathered Wetland Credits Owed</u></b> ) =		8.40

**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.

Qualitative Worksheet Summary For Wetland Adverse Impacts						
Worksheet Number	Name of Wetland	Wetland Type	Acres of Impact (ac.)	Impact Duration	2018 Credits	Grandfathered Credits
1	Wetland	Slope Wetlands	1.40	Permanent/Reoccurring	1.05	8.40
2			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
3			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
4			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
5			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
6			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
7			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
8			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
9			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
10			0.00	Choose Duration	Credits Owed	Grandfathered Credits Owed
Summary of Credits Owed						
Wetland Type	Acres of Impact (ac.)	2018 Credits	Grandfathered Credits			
Freshwater Tidal Wetlands	0.00	0.00	0.00			
Saltwater Tidal Wetlands	0.00	0.00	0.00			
Riverine/Lacustrine Fringe Wetlands	0.00	0.00	0.00			
Slope Wetlands	1.40	1.05	8.40			
Depressional/Flat Wetlands	0.00	0.00	0.00			
Open Water/Ditch/Canal	0.00	0.00	0.00			