



REPLY TO
ATTENTION OF

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

MARCH 07 2012

Regulatory Division
SAS-2009-01271

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-2009-01271

Applicant: Ms. Natalie Schanze
Georgia Ports Authority
Post Office Box 2406
Savannah, Georgia 31402

Agent: Mr. Joshua Bell
Sligh Environmental, Inc.
31 Park of Commerce Way, Suite 200B
Savannah, Georgia 31405

Location of Proposed Work: The project site is located on Savannah International Trade Park Property, north of Georgia Highway 21, east of Interstate 95, in the City of Port Wentworth, Chatham County, Georgia (Latitude 32.1850, Longitude -81.1821).

Description of Work Subject to the Jurisdiction of the US Army Corps of Engineers: The expansion of an existing trade park on a 477-acre site in Chatham County, Georgia. The proposed project would impact 4.65 acres of jurisdictional wetlands and an additional 1.83 acres of isolated wetlands.

BACKGROUND

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 West Oglethorpe Avenue Savannah, Georgia 31401-3640.

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

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

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 proposed project has been surveyed for resources potentially eligible for listing on the National Register of Historic Places. These surveys are currently under review by the Georgia State Historic Preservation Office. Presently, unknown archaeological, scientific, prehistorical or historical data may be located at the site and could be affected by the proposed work.

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.

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.

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, US Army Corps of Engineers, Savannah District, Attention: Mr. William M. Rutlin, 100 West 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 William M. Rutlin, Regulatory Specialist, Coastal Branch at 912-652-5893.

****Enclosures**

1. Supplemental Information, Savannah River International Trade Park, Chatham County, Georgia, January 23, 2012
2. Supplemental Information, Savannah River International Trade Park, Chatham County, Georgia, February 17, 2012

Supplemental Information
Savannah River International Trade Park
Chatham County, Georgia
January 23, 2012

Introduction:

The Georgia Ports Authority (GPA) is proposing the expansion of the existing Savannah River International Trade Park (SRITP). The 476.85 acre project site is located in Port Wentworth, west of Savannah, in Chatham County, Georgia at latitude 32° 11.06' N and longitude 81° 10.70' W. The project site is divided into six undeveloped parcels by International Trade Parkway, Little Hearst Parkway, and Little Hearst Creek. The project site is bordered to the west by Georgia Highway 21 and a CSX Transportation railroad. To the north, the site is bordered by Black Creek and its riverine bottomland swamp. To the east, the site is bordered by silvicultural land and the Savannah River. To the south, it is bordered by St. Augustine Creek and its riverine tidal wetlands.

History:

The entire SRITP property was once known as Mulberry Grove Plantation and Drakies Plantation and totaled 2,184 acres including approximately 1,222 acres of upland and 962 acres of wetland. The initial wetland delineation of the entire property was completed in 1997. In 2000, GPA performed an ecological evaluation and mitigation feasibility study on the entire 2,184 acre site. The environmental study and subsequent coordination with the USACE resulted in the creation of a mitigation pool which could be used for future GPA projects. It was determined that no wetland restoration or enhancement areas existed on-site, so GPA placed restrictive covenants on 454.6 acres of high value tidal bottomland swamp, 436.6 acres of high value brackish tidal marshlands and tidal creeks, and 164.6 acres of adjacent upland buffer. Because the mitigation pool consists of preservation only, the USACE has agreed that half of any mitigation required for future GPA projects within the Savannah River Watershed could be satisfied with the mitigation pool established on this property.

In 2003, an additional wetland determination was completed for the first development phase of the SRITP. A Department of the Army letter dated March 13, 2003 (Regulatory Branch 970000130) verified that 3.79 acres of wetland within the 275 acre Phase I project area were isolated non-jurisdictional. GPA leased the three undeveloped parcels to Target Corporation and IKEA. Each company commenced with development of their respective parcels to meet their individual needs. No jurisdictional impacts on any of the parcels were proposed, so no Department of the Army Permit or compensatory mitigation was required. Today, Target Corporation and IKEA distribution centers are located on Parcels 1, 6, and 7. These distribution facilities play a major role in each company's shipping, storing, and transportation of goods, and they provide a boost to the local economy.

By letter dated October 20, 2011, the USACE issued a jurisdictional determination for Phase II of the SRITP which includes Parcels 2, 3, 4, 5a, 5b, and 8 (SAS-2009-01271).

Existing Site Conditions:

As described below, the 476.85 acre project site is composed primarily of mixed hardwood and mixed pine/hardwood upland forest. The remainder of the property consists of pine forest and pine plantation, and the wetlands on-site consist of depressional hardwood forested wetlands and freshwater riverine bottomland swamp. The past land use for this property has been silvicultural and agricultural.

Mixed Hardwood:

At approximately 65% of the total project area, the most common habitat on-site is the mixed hardwood upland forest. This community contains a mix of upland hardwood species such as white oak (*Quercus alba*), water oak (*Quercus nigra*), southern red oak (*Quercus falcata*), mockernut hickory (*Carya tomentosa*), and sweetgum (*Liquidambar styraciflua*). Understory species consist of American holly (*Ilex opaca*), blueberry (*Vaccinium spp.*), wax myrtle (*Myrica cerifera*), and horse sugar (*Symplocos tinctoria*). Herbaceous species consist of spikegrass (*Chasmanthium spp.*), giant cane (*Arundinaria gigantea*), and ebony spleenwort (*Asplenium platyneuron*). The majority of this habitat is middle aged and the overstory ranges in age from 30 to 50 years old with slightly older and slightly younger areas.

Mixed Pine / Hardwood:

The mixed pine hardwood habitat comprises the majority of Parcel 2 or approximately 20% of the total project area. This 30 – 50 year old habitat is co-dominated to differing degrees by loblolly pine (*Pinus taeda*) and a mix of hardwood species such as water oak, red oak, and southern red oak. Other species include sweetgum, mockernut hickory, and cherrybark oak (*Quercus pagodifolia*). Understory species primarily include wax myrtle, blueberry, and spikegrass.

Pine Forest:

The majority of Parcels 5a, 5b, and a portion of Parcel 2 (+/- 9% of the total project area) contains pine forest. This habitat appears to have been thinned approximately 10 years ago in a seed tree or shelterwood type silvicultural harvesting operation. Today, the overstory consists of sparse but mature +/- 40 year old loblolly pine. Due to the most recent silvicultural operation, the understory has regenerated with very dense loblolly pine which have now reached a height of 20 – 25 feet. Other species in the mid and understory consist of sweetgum, water oak, southern red oak, wax myrtle, and spikegrass.

Pine Plantation:

Approximately 5% of the project site consists of 20 – 25 year old loblolly pine plantation. The overstory of this habitat is dominated by dense loblolly pine while the understory consists of sweetgum, water oak, wax myrtle, and spikegrass.

Depressional Wetland:

The wetlands (+/- 1% of the project area) within the development parcels consist of depressional forested wetlands dominated by hardwood. Generally, these wetlands are geographically isolated and less than one acre in size. Other wetlands that are not isolated consist of narrow depressional areas hydrologically connected to Black Creek to the north, St. Augustine Creek to the south and east, or Little Hearst Creek. The wetlands on site are generally dominated by swamp tupelo (*Nyssa biflora*) with lesser amounts of red maple (*Acer rubrum*), willow oak (*Quercus phellos*), water oak, and sweetbay (*Magnolia virginiana*) in the overstory and midstory. Understory species consist of wax myrtle, buttonbush (*Cephalanthus occidentalis*), smartweed (*Polygonum spp.*), and sedges (*Carex spp.*)

Freshwater Riverine Bottomland Swamp:

In addition to the depressional wetland habitats found within the project area, Little Hearst Creek transects the site and separates Parcel 2 from Parcel 3 and Parcel 4 from Parcels 5a and 5b. Little Hearst Creek is approximately 30 feet wide at the project site. The creek is a tidal freshwater creek that supports an adjacent cypress (*Taxodium distichum*) / swamp tupelo dominated forest. Other species within this riverine bottomland habitat include red maple, willow oak, myrtle leaved holly (*Ilex myrtifolia*), buttonbush, smartweed, sedges, blue flag iris (*Iris shrevei*), woolgrass (*Scirpus cyperinus*), dwarf palmetto (*Sabal minor*), and giant cane. Also, Black Creek borders the site to the north and St. Augustine Creek borders the site to the south and east, but these wetland systems are outside of the project area and have been preserved with restrictive covenants.

Project Purpose:

The overall project purpose is to expand the existing SRITP and provide additional distribution facilities which will service the Port of Savannah. The additional distribution facilities will allow goods shipped into the U.S. and received at the Garden City Terminal to be stored until shipped by truck to population centers throughout the U.S. The large area of contiguous upland within the SRITP parcels provides ideal areas to locate these distribution centers.

Proposed Site Plan:

The proposed site plan requires impacts to 4.65 acres of jurisdictional wetland associated with the construction of additional distribution facilities at the SRITP. The facilities were designed to avoid as much wetland as possible while still maximizing the amount of storing, shipping, and processing capabilities that the site affords. Each parcel will contain a distribution warehouse which will be used to store, sort, handle, and process goods along with adequate container parking / storage area, employee parking, stormwater retention area, and landscaping. The proposed site plan complies with the existing parcel design model of the SRITP. Below is a brief discussion of the site plan including wetland impacts for each parcel.

Parcel 2

Parcel 2 is the most highly visible of all of the development parcels being located at the northern intersection of Highway 21 and International Trade Parkway. Not including the jurisdictional wetland system associated with Little Hearst Creek which borders the parcel to the north, the 95.37 acre parcel contains 0.70 acres of jurisdictional wetland. Development activities proposed for Parcel 2 include constructing a mid-sized +/- 667,000 ft² warehouse, approximately 777 large container storage spaces, employee parking, and a stormwater treatment pond on the western portion of the site

Parcel 3

Parcel 3 is a 127.61 acre parcel located north of Parcel 2, west of International Trade Parkway, between the Little Hearst Creek wetland system and the Black Creek wetland system. Not including the preserved wetlands associated with Black Creek to the north and the un-preserved Little Hearst Creek wetlands to the south, the parcel only contains a 0.76 acre wetland finger which is not preserved and extends southward from the Black Creek swamp. Development activities for Parcel 3 include constructing a large +/-1,505,000 ft² building, approximately 770 large container storage spaces, employee parking, and two stormwater treatment ponds on the western portion of the site.

Parcel 4

Parcel 4 is a 137.15 acre parcel located east of International Trade Parkway between the Little Hearst Creek wetland system and the Black Creek wetland system. Not including the preserved wetlands associated with Black Creek to the north and the un-preserved Little Hearst Creek wetlands to the south, the parcel does not contain any jurisdictional areas. Development activities include constructing a large +/-1,650,000 ft² building, approximately 1,138 large container storage spaces, employee parking, and a stormwater treatment pond on the western portion of the site.

Parcel 5a

Parcel 5a is a 25.21 acre parcel located at the northeastern intersection of International Trade Parkway and Little Hearst Parkway. Not including the un-preserved bottomland wetlands associated with Little Hearst Creek to the north, the parcel only contains a narrow 0.86 acre depressional hardwood wetland finger along the western portion of the parcel. Development activities include constructing a small +/-237,000 ft² building, approximately 135 large container storage spaces, employee parking, and a stormwater treatment pond on the northern portion of the site.

Parcel 5b

Parcel 5b is a 20.44 acre parcel located east of Parcel 5a, north of Little Hearst Parkway, south of Little Hearst Creek, and west of the existing IKEA facility. Not including the un-preserved bottomland wetlands associated with Little Hearst Creek to the north, the parcel does not contain any jurisdictional areas. Development activities include constructing a small +/-240,000 ft² building, approximately 136 large container storage spaces, employee parking, and a stormwater treatment pond on the northern portion of the site.

Parcel 8

Parcel 8 is a 71.25 acre parcel located south of Little Hearst Parkway, east of the existing Target Corporation distribution center. Not including the preserved riverine wetlands associated with St. Augustine Creek to the east and south of the parcel, Parcel 8 contains a 1.60 acre freshwater ditch which transects the property from east to west and a 0.73 acre depressional hardwood wetland on the southern portion of the parcel. Development activities for Parcel 8 include constructing a mid-sized +/-500,000 ft² building, approximately 734 large container storage spaces, employee parking, and a stormwater treatment pond on the northern portion of the site.

Alternatives Analysis:

The Section 404 (b)(1) Guidelines provide that the discharge of dredged or fill material into waters of the United States will not be permitted "if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." 40 C.F.R. §230.10(a). The guidelines further provide that "[a]n alternative is

practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes.” Considering factors such as site location, availability, site access, wetland area, and a variety of economic concerns, the applicant evaluated a number of different alternatives to provide a complex of suitable size.

Alternative Sites:

The proposed project is the expansion of an existing facility. The existing SRITP contains three large distribution centers along with the associated infrastructure including International Trade Parkway, Little Hearst Parkway, and the necessary utilities. Expansion of an existing facility is an environmentally preferable alternative as compared to the development of a green site or opening of a new facility. It is assumed that in order to construct all new roads, install utilities, and develop a green site of similar acreage, a greater amount of wetland impact would be required. Expansion of the SRITP to the south, east, and west is not possible as development of these alternative sites would require significant fill to high quality tidal wetland. The Savannah River is located to the east and St. Augustine Creek is located to the south of the site, so expansion south and east is not possible or environmentally preferable. To the west of the site is Highway 21, residential areas, a baseball field, and St. Augustine Creek. Expansion onto alternative sites to the west of the SRITP is not possible either. The only direction that expansion of the facility is feasible is to the north as proposed.

Alternative Site Plans:

With the project site chosen, the applicant has examined different site plans and parcel configurations in an effort to avoid and minimize wetland impacts to the greatest extent practicable. In order to make the project attractive to new tenants, it is essential to maximize the use of upland area in order to provide the largest distribution center possible. With this in mind, GPA evaluated different design configurations on the various parcels in order to avoid wetlands and minimize the unavoidable impacts. Within Parcel 2 for instance, 0.70 acres of jurisdictional wetland impact are proposed. Wetland 1 is a low quality hardwood depression area that is hydrological and geographically disconnected from other jurisdictional areas. Although there is a culvert under International Trade Parkway which should theoretically connect this wetland to the Little Hearst Creek system, it is obvious upon examination that this wetland has effectively been cut-off from other jurisdictional areas. With this wetland being located on the frontage of International Trade Parkway at its intersection with Little Hearst Parkway, avoidance is not feasible. During the planning process of this project, GPA evaluated avoiding Wetland 1 by rotating the warehouse and re-arranging the container storage areas. If the building were rotated and located on the northern portion of the parcel adjacent to Little Hearst Creek, approximately 118,000 ft² of warehouse space would be lost. Also, with the alternative design, the container parking would be re-arranged and approximately 80 spaces would be lost. With the alternative design, the smaller building and fewer container spaces makes the alternative design much less attractive to a future tenant and therefore infeasible.

Within Parcel 3, 0.76 acre of impact is required to Wetland 3. This wetland is a narrow finger which extends approximately 500 feet onto the parcel from the Black Creek drainage. The applicant attempted to avoid this wetland but found that it was not practicable. Avoidance of this wetland would require the applicant to reduce the amount of container storage by 258 spaces. Due to topography in the area, if this wetland were not impacted, approximately 15 acres of land would be lost for development, and the stormwater retention pond would have to be located east of the wetland. To guarantee the success of the development and to ensure that the parcels are marketable to the GPA's target market, the parcels must accommodate as large a distribution facility as possible. Because avoidance of Wetland 3 negatively affects the amount of developable space and could jeopardize the success of the project, avoidance is not feasible.

Within Parcel 4, no jurisdictional impacts are proposed. The initial plan for this parcel included a distribution building that was approximately 104,000 ft² larger than proposed. The larger building would be more attractive for future tenants, but it required an impact to 0.13 acre of bottomland wetland associated with Little Hearst Creek on the eastern side of the parcel. An additional 252 container storage spaces were proposed on the southwestern portion of the parcel which required additional impacts of 1.25 acres of bottomland wetland adjacent to Little Hearst Creek. In an effort to minimize wetland impacts, the applicant opted for the proposed site plan which reduced the square footage of the building and reduced container storage spaces. The 1.38 acres of previously proposed jurisdictional wetland impacts were completely avoided on this parcel.

Within Parcel 5a, 0.86 acres of jurisdictional impact is proposed to Wetland 2. This wetland is a narrow depressional hardwood wetland that is a finger off of the Little Hearst Creek system. The initial site plan for this parcel called for impacts to 1.07 acres of higher quality bottomland wetland adjacent to the Little Hearst Creek system. This wetland finger separates Parcel 5a from Parcel 5b. The initial site plan called for filling this wetland in order to accommodate the development of the parcels as one larger parcel. However, the applicant opted to avoid this higher quality wetland and provide two smaller distribution facilities. In doing this, the facility and stormwater retention pond on Parcel 5a had to be shifted to the west thereby requiring impacts to Wetland 2. Given the small acreage of this parcel, it is not feasible to reduce the size of the distribution facility any further to avoid Wetland 2. A smaller facility would not be useable by the target market of GPA. Also, it is environmentally preferable to avoid the higher quality bottomland wetland that directly abuts Little Hearst Creek and impact Wetland 2 instead. The applicant decided on the most environmentally sensitive option of impacting the lower quality 0.86 acre Wetland 2 than impacting 1.07 acres of high quality bottomland swamp. With this alternative, GPA avoided 0.21 acres of bottomland wetland impacts.

Within Parcel 8, the site plan requires 1.6 acres of impact to Wetland 4 which is a jurisdictional ditch and 0.73 acre of impact to Wetland 5 which is a depressional, ditched wetland. Wetland 4 runs through the parcel from east to west and divides the parcel into a +/-25 acre southern section and a +/- 44 acre northern section. The applicant evaluated locating the facility entirely north of Wetland 4, but this alternative drastically reduced the size of the distribution facility. The storm water pond would also have to be located north of Wetland 4. With the alternative design, approximately 360 container parking spaces were lost. The remaining number of spaces is not suitable for the mid-sized distribution building proposed for this parcel. GPA evaluated constructing a smaller facility on this parcel; however, it is preferable that the expansion provide two large, two small, and two mid-sized distribution facilities. Constructing a small facility on this parcel would not fit into the proposed site design model.

The proposed site plan allows GPA to develop +/-476 acres of land and only impact 4.65 acres of jurisdictional wetland which is less than 1% of the total area. All preserved wetlands are being avoided. Additionally, the majority of impacts are to lower quality depressional areas, and impacts to the high quality bottomland habitat on-site are being avoided. The proposed development plan for the SRITP expansion allows GPA to maximize usage of upland areas while minimizing impacts to wetlands. The finished development will provide large, small, and medium sized distribution facilities which will service the Port of Savannah. The project will have a significant positive impact on the local economy.

Mitigation Plan:

GPA is proposing to satisfy half of the mitigation for this project by using the previously approved Mulberry Grove Mitigation Pool (preservation only) and the other half by purchasing credits from a commercial mitigation bank. As mentioned above, the USACE has authorized the Mulberry Grove Mitigation Pool to satisfy half of the mitigation requirement for USACE permits. The restrictive covenants for the mitigation area were filed in the Office of the Clerk of the Superior Court of Chatham County, Georgia on December 9, 2002 and recorded in Deed Book 244-A, Page 1.

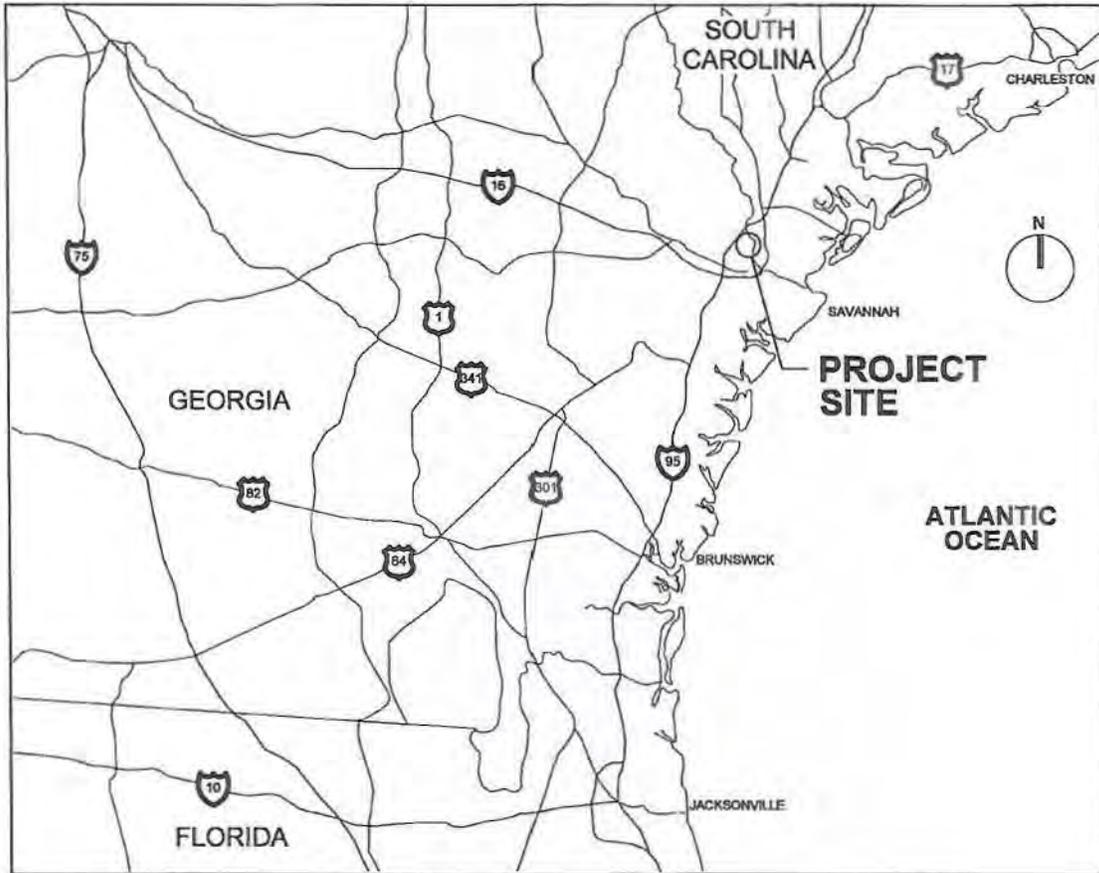
Mitigation ratios for the Mulberry Grove preservation areas were established by the USACE as 10:1 for bottomland swamp and 12:1 for adjacent upland buffer. Approximately 80% of the 1,055 acre preservation area at Mulberry Grove consists of freshwater tidal wetland and 20% is upland buffer. The mitigation calculations are given in terms of acres instead of credits. GPA is proposing to use the pool to offset half of the impacts to a total of 4.65 acres of jurisdictional wetland. As indicated on the attached mitigation worksheets, a total of 24.18 acres of Mulberry Grove mitigation is required to offset half of the impacts to the 4.65 acres of jurisdictional wetland.

In order to satisfy the remainder of the mitigation, GPA is proposing to purchase credits from a mitigation bank which services the project area. As indicated on the attached mitigation worksheets, 30.145 wetland mitigation credits would be required to off-set all of the mitigation via credit purchase. To satisfy half of the mitigation by credit purchase, GPA is proposing to purchase 15.1 credits from a USACE approved mitigation bank that services the project area.

Conclusion:

In summary, GPA is proposing the expansion of the SRITP. The proposed site plan requires impacts to 4.65 acres of jurisdictional wetland associated with the construction of six additional distribution facilities at the SRITP. The

facilities were designed to avoid as much wetland as possible while still maximizing the amount of storing, shipping, and processing capabilities that the site affords. Each parcel will contain a distribution building along with adequate container parking / storage area, employee parking, stormwater retention area, landscaping, utilities, and other infrastructure. The applicant has made every possible effort to avoid jurisdictional impacts. Where impacts are unavoidable, the applicant has revised the site plan to minimize impacts as much as possible. As mitigation for the project related impacts, the applicant has proposed to debit 24.18 acres from the Mulberry Grove Mitigation Pool and purchase 15.1 wetland mitigation credits from a USACE approved mitigation bank. The applicant has avoided and minimized wetland impacts to the greatest extent practicable while still satisfying the project purpose. All development activities will be performed using best management practices (silt fencing, grassed slopes, etc.) to further avoid and minimize impacts to jurisdictional areas that are to be avoided within the project area.



VICINITY MAP
 NOT TO SCALE

PURPOSE:

EXPANSION OF INDUSTRIAL
 DEVELOPMENT AT TRADE PARK

SHEET 1 OF 4

VICINITY MAP

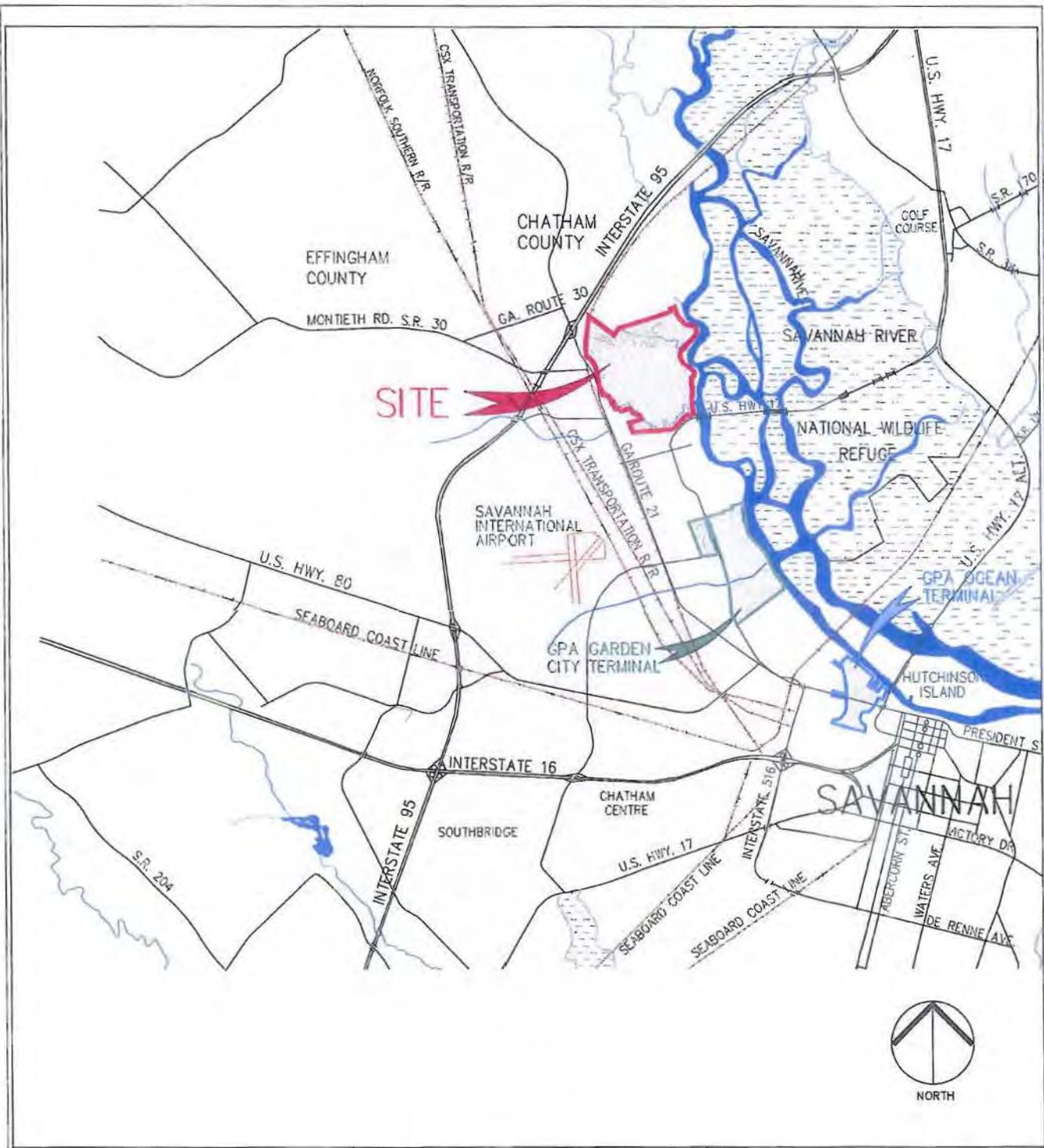
GPA SAVANNAH RIVER
 INTERNATIONAL TRADE PARK
 INTERSECTION OF GA S.R. 21 &
 INTERNATIONAL TRADE PARKWAY
 PORT WENTWORTH, GA

ADJACENT TO: SAVANNAH RIVER

APPLICANT: GEORGIA PORTS AUTHORITY

COUNTY: CHATHAM, GA

DATE: 29-SEP-2011



PURPOSE:
 EXPANSION OF INDUSTRIAL
 DEVELOPMENT AT TRADE PARK

SHEET NO. 2 OF 4

LOCATION MAP
 SCALE : NONE

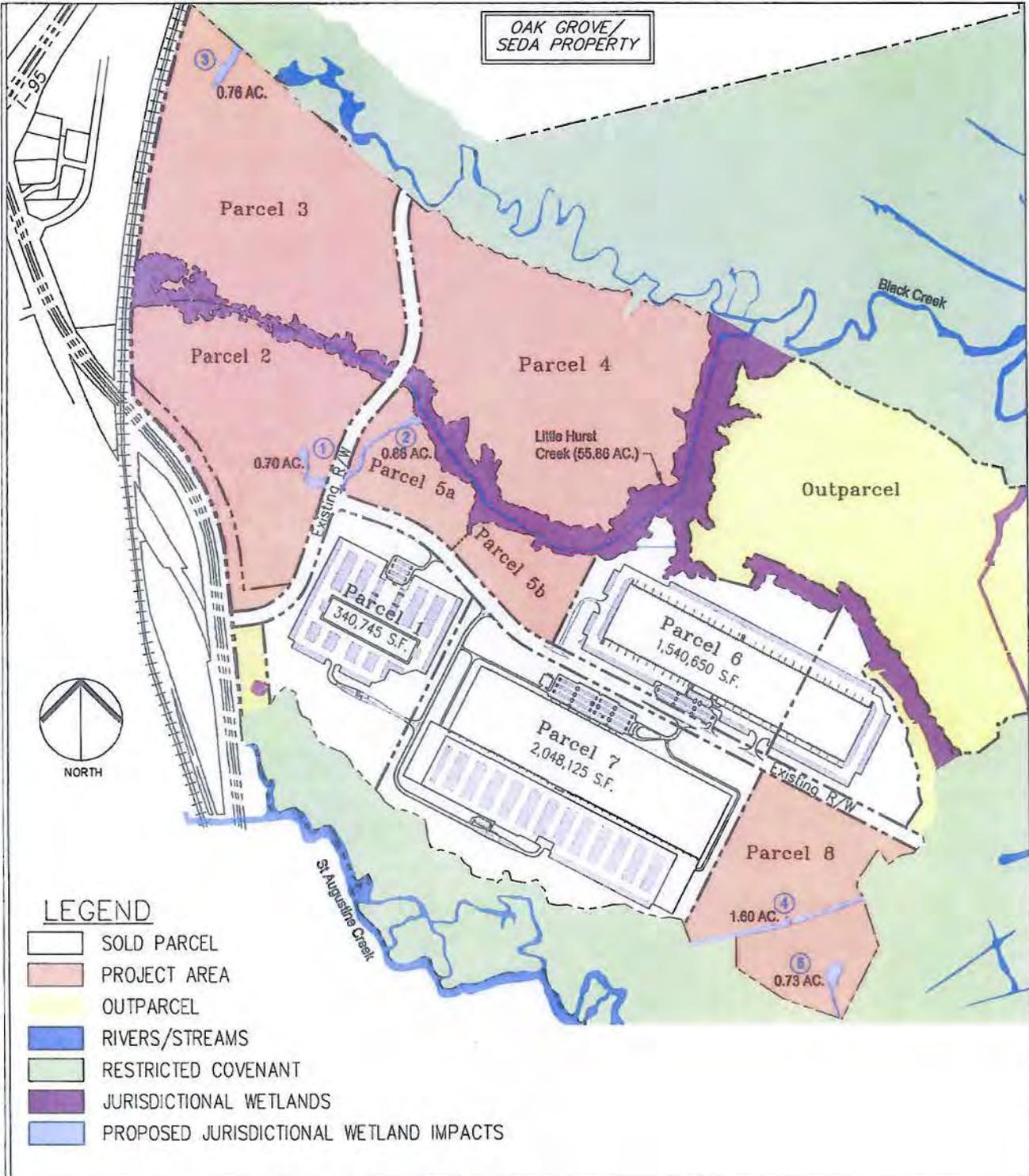
GPA SAVANNAH RIVER
 INTERNATIONAL TRADE PARK
 INTERSECTION OF GA S.R. 21 &
 INTERNATIONAL TRADE PARKWAY
 PORT WENTWORTH, GA

ADJACENT TO: SAVANNAH RIVER

APPLICANT: GEORGIA PORTS
 AUTHORITY
 COUNTY: CHATHAM, GA

DATE: 23-JAN-2012

OAK GROVE/
SEDA PROPERTY



PURPOSE:
EXPANSION OF INDUSTRIAL
DEVELOPMENT AT TRADE PARK

SHEET NO. 3 OF 4

WETLAND PLAN

SCALE : NONE

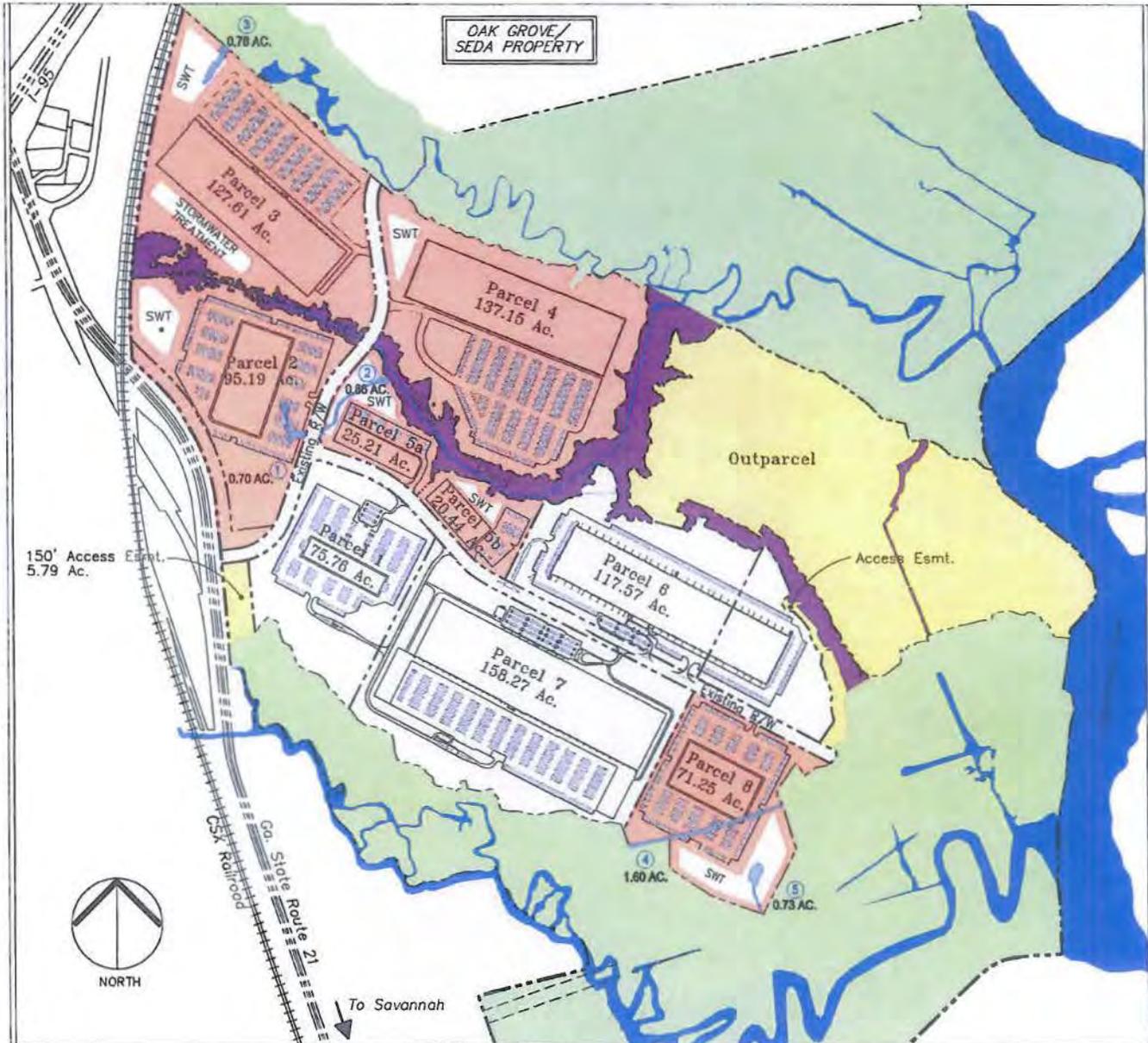
GPA SAVANNAH RIVER
INTERNATIONAL TRADE PARK
INTERSECTION OF GA S.R. 21 &
INTERNATIONAL TRADE PARKWAY
PORT WENTWORTH, GA

ADJACENT TO: SAVANNAH RIVER

APPLICANT: GEORGIA PORTS
AUTHORITY
COUNTY: CHATHAM, GA

DATE: 29-SEP-2011

©\CPA\berry Grove\Drawings\AC2E-SRTP.dwg



LEGEND

- OCCUPIED PARCEL
- RESTRICTED COVENANT
- RIVERS/STREAMS
- PROPOSED PARCEL
- JURISDICTIONAL WETLANDS
- STORMWATER TREATMENT PONDS
- OUTPARCEL
- PROPOSED JURISDICTIONAL WETLAND IMPACTS (4.65 Ac)

PURPOSE:
 EXPANSION OF INDUSTRIAL DEVELOPMENT AT TRADE PARK
 SHEET NO. 4 OF 4

PROPOSED SITE LAYOUT PLAN
 SCALE : NONE
 GPA SAVANNAH RIVER INTERNATIONAL TRADE PARK
 INTERSECTION OF GA S.R. 21 & INTERNATIONAL TRADE PARKWAY
 PORT WENTWORTH, GA

ADJACENT TO: SAVANNAH RIVER
 APPLICANT: GEORGIA PORTS AUTHORITY
 COUNTY: CHATHAM, GA
 DATE: 23-JAN-2012

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WETLANDS AND OPEN WATERS MITIGATION WORKSHEETS

ADVERSE IMPACT FACTORS

Factor	Options						
	Fill 2.0	Dredge 1.8	Impound 1.6	Drain 1.4	Flood 1.2	Clear 1.0	Shade 0.5
Duration of Effects	7+ years 2.0	5-7 years 1.5	3-5 years 1.0	1-3 years 0.5	< 1 year 0.1		
Existing Condition	Class 1 2.0	Class 2 1.5	Class 3 1.0	Class 4 0.5	Class 5 0.1		
Lost Kind	Kind A 2.0	Kind B 1.5	Kind C 1.0	Kind D 0.5	Kind E 0.1		
Preventability	High 2.0	Moderate 1.0	Low 0.5	None 0			
Rarity Ranking	Rare 2.0	Uncommon 0.5	Common 0.1				

† These factors are determined on a case-by-case basis.

REQUIRED MITIGATION CREDITS WORKSHEET FOR JURISDICTIONAL IMPACTS

Factor	W/L1	W/L2	W/L3	W/L4	W/L5	
Dominant Effect	2.0	2.0	2.0	2.0	2.0	
Duration of Effect	2.0	2.0	2.0	2.0	2.0	
Existing Condition	1.5	1.5	1.5	0.1	1.0	
Lost Kind	1.0	1.5	1.5	0.1	1.5	
Preventability	0.5	0.5	0.5	0.5	0.5	
Rarity Ranking	0.1	0.1	0.1	0.1	0.1	
Sum of r Factors	$R_3 = 7.1$	$R_4 = 7.6$	$R_4 = 7.6$	$R_4 = 4.8$	$R_4 = 7.1$	
Impacted Area	$AA_3 = 0.70$	$AA_4 = 0.86$	$AA_5 = 0.76$	$AA_6 = 1.6$	$AA_1 = 0.73$	
$R \times AA =$	4.97	6.536	5.776	7.68	5.183	

Required Credits = $\sum (R \times AA) =$ 30.145

Supplemental Information
Savannah River International Trade Park
Chatham County, Georgia
February 17, 2012

Introduction:

The Georgia Ports Authority (GPA) is proposing the expansion of the existing Savannah River International Trade Park (SRITP). The 476.85 acre project site is located in Port Wentworth, west of Savannah, in Chatham County, Georgia at latitude 32° 11.06' N and longitude 81° 10.70' W. The project site is divided into six undeveloped parcels by International Trade Parkway, Little Hearst Parkway, and Little Hearst Creek. The project site is bordered to the west by Georgia Highway 21 and a CSX Transportation railroad. To the north, the site is bordered by Black Creek and its riverine bottomland swamp. To the east, the site is bordered by silvicultural land and the Savannah River. To the south, it is bordered by St. Augustine Creek and its riverine tidal wetlands.

History:

The entire SRITP property was once known as Mulberry Grove Plantation and Drakies Plantation and totaled 2,184 acres including approximately 1,222 acres of upland and 962 acres of wetland. The initial wetland delineation of the entire property was completed in 1997. In 2000, GPA performed an ecological evaluation and mitigation feasibility study on the entire 2,184 acre site. It was determined that no wetland restoration or enhancement areas existed on-site, so GPA placed restrictive covenants on 454.6 acres of high value tidal bottomland swamp, 436.6 acres of high value brackish tidal marshlands and tidal creeks, and 164.6 acres of adjacent upland buffer.

In 2003, an additional wetland determination was completed for the first development phase of the SRITP. A Department of the Army letter dated March 13, 2003 (Regulatory Branch 970000130) verified that 3.79 acres of wetland within the 275 acre Phase I project area were isolated non-jurisdictional. GPA leased two undeveloped parcels to Target Corporation and sold one parcel to IKEA. Each company commenced with development of their respective parcels to meet their individual needs. No jurisdictional impacts on any of the parcels were proposed, so no Department of the Army Permit or compensatory mitigation was required. Today, Target Corporation and IKEA distribution centers are located on these three parcels. These distribution facilities play a major role in each company's shipping, storing, and transportation of goods received at the Garden City Terminal, and they provide a boost to the local economy.

By letter dated October 20, 2011, the USACE issued a jurisdictional determination for Phase II of the SRITP which includes Parcels 2, 3, 4, 5a, 5b, and 8 (SAS-2009-01271).

Existing Site Conditions:

As described below, the 476.85 acre project site is composed primarily of mixed hardwood and mixed pine/hardwood upland forest. The remainder of the property consists of pine forest and pine plantation, and the wetlands on-site consist of depressional hardwood forested wetlands and freshwater riverine bottomland swamp. The past land use for this property has been silvicultural and agricultural.

Mixed Hardwood:

At approximately 65% of the total project area, the most common habitat on-site is the mixed hardwood upland forest. This community contains a mix of upland hardwood species such as white oak (*Quercus alba*), water oak (*Quercus nigra*), southern red oak (*Quercus falcata*), mockernut hickory (*Carya tomentosa*), and sweetgum (*Liquidambar styraciflua*). Understory species consist of American holly (*Ilex opaca*), blueberry (*Vaccinium spp.*), wax myrtle (*Myrica cerifera*), and horse sugar (*Symplocos tinctoria*). Herbaceous species consist of spikegrass (*Chasmanthium spp.*), giant cane (*Arundinaria gigantea*), and ebony spleenwort (*Asplenium platyneuron*). The majority of this habitat is middle aged and the overstory ranges in age from 30 to 50 years old with slightly older and slightly younger areas.

Mixed Pine / Hardwood:

The mixed pine hardwood habitat comprises the majority of Parcel 2 or approximately 20% of the total project area. This 30 – 50 year old habitat is co-dominated to differing degrees by loblolly pine (*Pinus taeda*) and a mix of hardwood species such as water oak, red oak, and southern red oak. Other species

include sweetgum, mockernut hickory, and cherrybark oak (*Quercus pagodifolia*). Understory species primarily include wax myrtle, blueberry, and spikegrass.

Pine Forest:

The majority of Parcels 5a, 5b, and a portion of Parcel 2 (+/- 9% of the total project area) contains pine forest. This habitat appears to have been thinned approximately 10 years ago in a seed tree or shelterwood type silvicultural harvesting operation. Today, the overstory consists of sparse but mature +/- 40 year old loblolly pine. Due to the most recent silvicultural operation, the understory has regenerated with very dense loblolly pine which have now reached a height of 20 – 25 feet. Other species in the mid and understory consist of sweetgum, water oak, southern red oak, wax myrtle, and spikegrass.

Pine Plantation:

Approximately 5% of the project site consists of 20 – 25 year old loblolly pine plantation. The overstory of this habitat is dominated by dense loblolly pine while the understory consists of sweetgum, water oak, wax myrtle, and spikegrass.

Depressional Wetland:

The wetlands (+/- 1% of the project area) within the development parcels consist of depressional forested wetlands dominated by hardwood. Generally, these wetlands are geographically isolated and less than one acre in size. Other wetlands that are not isolated consist of narrow depressional areas hydrologically connected to Black Creek to the north, St. Augustine Creek to the south and east, or Little Hearst Creek. The wetlands on site are generally dominated by swamp tupelo (*Nyssa biflora*) with lesser amounts of red maple (*Acer rubrum*), willow oak (*Quercus phellos*), water oak, and sweetbay (*Magnolia virginiana*) in the overstory and midstory. Understory species consist of wax myrtle, buttonbush (*Cephalanthus occidentalis*), smartweed (*Polygonum spp.*), and sedges (*Carex spp.*)

Freshwater Riverine Bottomland Swamp:

In addition to the depressional wetland habitats found within the project area, Little Hearst Creek transects the site and separates Parcel 2 from Parcel 3 and Parcel 4 from Parcels 5a and 5b. Little Hearst Creek is approximately 30 feet wide at the project site. The creek is a tidal freshwater creek that supports an adjacent cypress (*Taxodium distichum*) / swamp tupelo dominated forest. Other species within this riverine bottomland habitat include red maple, willow oak, myrtle leaved holly (*Ilex myrtifolia*), buttonbush, smartweed, sedges, blue flag iris (*Iris shrevei*), woolgrass (*Scirpus cyperinus*), dwarf palmetto (*Sabal minor*), and giant cane. Also, Black Creek borders the site to the north and St. Augustine Creek borders the site to the south and east, but these wetland systems are outside of the project area and have been preserved with restrictive covenants.

Project Purpose:

The overall project purpose is to complete the build out of the existing SRITP and provide additional distribution facilities which will service the Port of Savannah. The additional distribution facilities will allow goods shipped into the U.S. and received via water borne commerce at GPA's Garden City Terminal to be processed and stored until shipped by truck to population centers throughout the U.S. The large area of contiguous upland within the SRITP parcels provides ideal areas to locate these distribution centers. The proposed project will provide a major boost to the local economy.

Proposed Site Plan:

The proposed site plan includes impacts to 4.65 acres of jurisdictional wetland and 1.83 acres of isolated non-jurisdictional wetland associated with the construction of additional distribution facilities at the SRITP. The facilities were designed to avoid as much wetland as possible while still maximizing the amount of storing, shipping, and processing capabilities that the site affords. Each parcel will contain a distribution warehouse which will be used to store, sort, handle, and process goods along with adequate container parking / storage area, employee parking, stormwater retention area, and landscaping. The proposed site plan complies with the existing parcel design model of the SRITP. Below is a brief discussion of the site plan including wetland impacts for each parcel.

Parcel 2

Parcel 2 is the most highly visible of all of the development parcels being located at the northern intersection of Highway 21 and International Trade Parkway. Not including the jurisdictional wetland system associated with Little Hearst Creek which borders the parcel to the north, the 95.37 acre parcel contains 0.70 acres of jurisdictional wetland and 0.52 acres of verified isolated non-jurisdictional wetland. Development activities proposed for Parcel 2 include constructing a mid-sized +/- 667,000 ft² warehouse, approximately 777 large container storage spaces, employee parking, and a stormwater treatment pond on the western portion of the site

Parcel 3

Parcel 3 is a 127.61 acre parcel located north of Parcel 2, west of International Trade Parkway, between the Little Hearst Creek wetland system and the Black Creek wetland system. Not including the preserved wetlands associated with Black Creek to the north and the un-preserved Little Hearst Creek wetlands to the south, the parcel only contains a 0.76 acre wetland finger which is not preserved and extends southward from the Black Creek swamp. Development activities for Parcel 3 include constructing a large +/-1,505,000 ft² building, approximately 770 large container storage spaces, employee parking, and two stormwater treatment ponds on the western portion of the site.

Parcel 4

Parcel 4 is a 137.15 acre parcel located east of International Trade Parkway between the Little Hearst Creek wetland system and the Black Creek wetland system. Not including the preserved wetlands associated with Black Creek to the north and the un-preserved Little Hearst Creek wetlands to the south, the parcel only contains a 0.88 acre isolated non-jurisdictional depressional hardwood wetland. No jurisdictional areas are located on this parcel. Development activities include constructing a large +/-1,650,000 ft² building, approximately 1,138 large container storage spaces, employee parking, and a stormwater treatment pond on the western portion of the site.

Parcel 5a

Parcel 5a is a 25.21 acre parcel located at the northeastern intersection of International Trade Parkway and Little Hearst Parkway. Not including the un-preserved bottomland wetlands associated with Little Hearst Creek to the north, the parcel only contains a narrow 0.86 acre depressional hardwood wetland finger along the western portion of the parcel. Development activities include constructing a small +/-237,000 ft² building, approximately 135 large container storage spaces, employee parking, and a stormwater treatment pond on the northern portion of the site.

Parcel 5b

Parcel 5b is a 20.44 acre parcel located east of Parcel 5a, north of Little Hearst Parkway, south of Little Hearst Creek, and west of the existing IKEA facility. Not including the un-preserved bottomland wetlands associated with Little Hearst Creek to the north, the parcel only contains a 0.42 acre isolated non-jurisdictional wetland on the western portion of the parcel. No jurisdictional areas are located within this parcel. Development activities include constructing a small +/-240,000 ft² building, approximately 136 large container storage spaces, employee parking, and a stormwater treatment pond on the northern portion of the site.

Parcel 8

Parcel 8 is a 71.25 acre parcel located south of Little Hearst Parkway, east of the existing Target Corporation distribution center. Not including the preserved riverine wetlands associated with St. Augustine Creek to the east and south of the parcel, Parcel 8 contains a 1.60 acre freshwater ditch which transects the property from east to west and a 0.73 acre depressional hardwood wetland on the southern portion of the parcel. Development activities for Parcel 8 include constructing a mid-sized +/-500,000 ft² building, approximately 734 large container storage spaces, employee parking, and a stormwater treatment pond on the northern portion of the site.

Alternatives Analysis:

The Section 404 (b)(1) Guidelines provide that the discharge of dredged or fill material into waters of the United States will not be permitted "if there is a practicable alternative to the proposed discharge which would have less

adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." 40 C.F.R. §230.10(a). The guidelines further provide that "[a]n alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes." Considering factors such as site location, availability, site access, wetland area, and a variety of economic concerns, the applicant evaluated a number of different alternatives to provide a complex of suitable size.

Alternative Sites:

The proposed project is the expansion of an existing facility. The existing SRITP contains three large distribution centers along with the associated infrastructure including International Trade Parkway, Little Hearst Parkway, and the necessary utilities. Expansion of an existing facility is an environmentally preferable alternative as compared to the development of a green site or opening of a new facility. It is assumed that in order to construct all new roads, install utilities, and develop a green site of similar acreage, a greater amount of wetland impact would be required. Expansion of the SRITP to the south, east, and west is not possible as development of these alternative sites would require significant fill to high quality tidal wetland. The Savannah River is located to the east and St. Augustine Creek is located to the south of the site, so expansion south and east is not possible or environmentally preferable. To the west of the site is Highway 21, residential areas, a baseball field, and St. Augustine Creek. Expansion onto alternative sites to the west of the SRITP is not possible either. The only direction that expansion of the facility is feasible is to the north as proposed.

Alternative Site Plans:

With the project site chosen, the applicant has examined different site plans and parcel configurations in an effort to avoid and minimize wetland impacts to the greatest extent practicable. In order to make the project attractive to new tenants, it is essential to maximize the use of upland area in order to provide the largest distribution center possible. With this in mind, GPA evaluated different design configurations on the various parcels in order to avoid wetlands and minimize the unavoidable impacts. First and foremost, GPA designed the parcels to avoid all preserved wetlands associated with the Black Creek and St. Augustine Creek systems to the north and south of the site respectively. Furthermore, GPA designed the project to avoid all impacts to the high quality bottomland hardwood wetland system adjacent to Little Hearst Creek which bisects the project site.

Within Parcel 2, 0.70 acres of jurisdictional wetland impact and 0.52 acres of isolated non-jurisdictional wetland impact are proposed. Wetland 1 is a low quality hardwood depression area that is hydrologically and geographically disconnected from other jurisdictional areas. Although there is a culvert under International Trade Parkway which should theoretically connect this wetland to the Little Hearst Creek system, it is obvious upon examination that this wetland has effectively been cut-off from other jurisdictional areas. With this wetland being located on the frontage of International Trade Parkway at its intersection with Little Hearst Parkway, avoidance is not feasible. During the planning process of this project, GPA evaluated avoiding Wetland 1 by rotating the warehouse and re-arranging the container storage areas. If the building were rotated and located on the northern portion of the parcel adjacent to Little Hearst Creek, approximately 118,000 ft² of warehouse space would be lost. Also, with the alternative design, the container parking would be re-arranged and approximately 80 spaces would be lost. The isolated wetlands are centrally located in the parcel and are unavoidable. With the alternative design, the smaller building and fewer container spaces makes the alternative design much less attractive to a future tenant and therefore infeasible.

Within Parcel 3, 0.76 acre of impact is required to Wetland 3. This wetland is a narrow finger which extends approximately 500 feet onto the parcel from the Black Creek drainage. The applicant attempted to avoid this wetland but found that it was not practicable. Avoidance of this wetland would require the applicant to reduce the amount of container storage by 258 spaces. Due to topography in the area, if this wetland were not impacted, approximately 15 acres of land would be lost for development, and the stormwater retention pond would have to be located east of the wetland. To guarantee the success of the development and to ensure that the parcels are marketable to the GPA's target market, the parcels must accommodate as large a distribution facility as possible. Because avoidance of Wetland 3 negatively affects the amount of developable space and could jeopardize the success of the project, avoidance is not feasible.

Within Parcel 4, no jurisdictional impacts are proposed and only 0.88 acre of isolated non-jurisdictional wetland impact is required. The isolated wetland on this parcel is centrally located, and avoidance of this wetland is not

feasible. The initial plan for this parcel included a distribution building that was approximately 104,000 ft² larger than proposed. The larger building would be more attractive for future tenants, but it required an impact to 0.13 acre of bottomland wetland associated with Little Hearst Creek on the eastern side of the parcel. An additional 252 container storage spaces were proposed on the southwestern portion of the parcel which required additional impacts of 1.25 acres of bottomland wetland adjacent to Little Hearst Creek. In an effort to minimize wetland impacts, the applicant opted for the proposed site plan which reduced the square footage of the building and reduced container storage spaces. The 1.38 acres of previously proposed jurisdictional wetland impacts were completely avoided on this parcel.

Within Parcel 5a, 0.86 acres of jurisdictional impact is proposed to Wetland 2. This wetland is a narrow depression hardwood wetland that is a finger off of the Little Hearst Creek system. The initial site plan for this parcel called for impacts to 1.07 acres of higher quality bottomland wetland adjacent to the Little Hearst Creek system. This wetland finger separates Parcel 5a from Parcel 5b. The initial site plan called for filling this wetland in order to accommodate the development of the parcels as one larger parcel. However, the applicant opted to avoid this higher quality wetland and provide two smaller distribution facilities. In doing this, the facility and stormwater retention pond on Parcel 5a had to be shifted to the west thereby requiring impacts to Wetland 2. Given the small acreage of this parcel, it is not feasible to reduce the size of the distribution facility any further to avoid Wetland 2. A smaller facility would not be useable by the target market of GPA. Also, it is environmentally preferable to avoid the higher quality bottomland wetland that directly abuts Little Hearst Creek and impact Wetland 2 instead. The applicant decided on the most environmentally sensitive option of impacting the lower quality 0.86 acre Wetland 2 than impacting 1.07 acres of high quality bottomland swamp. With this alternative, GPA avoided 0.21 acres of bottomland wetland impacts.

Within Parcel 8, the site plan requires 1.6 acres of impact to Wetland 4 which is a jurisdictional ditch and 0.73 acre of impact to Wetland 5 which is a depression, ditched wetland. Wetland 4 runs through the parcel from east to west and divides the parcel into a +/-25 acre southern section and a +/- 44 acre northern section. The applicant evaluated locating the facility entirely north of Wetland 4, but this alternative drastically reduced the size of the distribution facility. The storm water pond would also have to be located north of Wetland 4. With the alternative design, approximately 360 container parking spaces were lost. The remaining number of spaces is not suitable for the mid-sized distribution building proposed for this parcel. GPA evaluated constructing a smaller facility on this parcel; however, it is preferable that the expansion provide two large, two small, and two mid-sized distribution facilities. Constructing a small facility on this parcel would not fit into the proposed site design model.

The proposed site plan allows GPA to develop +/-476 acres of land and only impact 4.65 acres of jurisdictional wetland and 1.83 acres of isolated non-jurisdictional wetland which is slightly more than 1% of the total area. All preserved wetlands are being avoided. Additionally, the majority of impacts are to lower quality depression areas, and impacts to the high quality bottomland habitat on-site are being avoided. The proposed development plan for the SRITP expansion allows GPA to maximize usage of upland areas while minimizing impacts to wetlands. The finished development will provide large, small, and medium sized distribution facilities which will service the Port of Savannah. The project will have a significant positive impact on the local economy.

Mitigation Plan:

In order to mitigate the unavoidable wetland impacts, GPA is proposing to purchase credits from a wetland mitigation bank which services the Lower Savannah River Watershed. As indicated on the attached mitigation worksheets, 30.15 wetland mitigation credits are required to off-set the jurisdictional impacts. To offset secondary impacts to isolated non-jurisdictional wetlands, the applicant is proposing to purchase an additional 2.0 credits. Prior to the initiation of the wetland impacts, the applicant will purchase a total of 32.15 wetland credits from a commercial mitigation bank which services the Lower Savannah River Watershed and will provide the USACE with a proper receipt.

Conclusion:

In summary, GPA is proposing the expansion of the SRITP. The proposed site plan requires impacts to 4.65 acres of jurisdictional wetland and 1.83 acres of isolated non-jurisdictional wetland associated with the construction of six additional distribution facilities at the SRITP. The facilities were designed to avoid as much wetland as possible while still maximizing the amount of storing, shipping, and processing capabilities that the site affords. Each parcel will contain a distribution building along with adequate container parking / storage area, employee parking,

stormwater retention area, landscaping, utilities, and other infrastructure. The applicant has made every possible effort to avoid jurisdictional impacts. Where impacts are unavoidable, the applicant has revised the site plan to minimize impacts as much as possible. As mitigation for the project related impacts, the applicant has proposed to purchase a total of 32.15 wetland mitigation credits from a bank approved to sell credits in the Lower Savannah River Watershed. The applicant has avoided and minimized wetland impacts to the greatest extent practicable while still satisfying the project purpose. All development activities will be performed using best management practices (silt fencing, grassed slopes, etc.) to further avoid and minimize impacts to jurisdictional areas that are to be avoided within the project area.