

DEPARTMENT OF THE ARMY

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

August 9, 2021

Regulatory Division SAS-2020-00740

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-2020-00740

Applicant: Mr. Mark Hall

West Port Development Holdings, LLC

347 Abercorn Street

Savannah, Georgia 31401

Agent: Mr. Alton Brown

Resource and Land Consultants

41 Park of Commerce Drive, Suite 303

Savannah, Georgia 31405

Project Purpose as Proposed by Applicant: The applicant's stated project purpose is "to provide warehousing and supply-chain distribution space to service the long-term needs of business operating within the Port of Savannah. Specifically, the purpose of the proposed project is to construct a large-scale master planned industrial logistics center within the vicinity of the Interstate 16/Highway 280 interchange to accommodate regional supply-chain requirements for Class A distribution and support warehousing needs associated with the current and anticipated growth of this region and the Savannah Port."

<u>Location of Proposed Work</u>: The project site totals approximately 763.84 acres and is located adjacent to and south of Highway 80, north of Interstate 16, and west of Highway 280, within Bryan County, Georgia (Latitude 32.2074°, Longitude -81.4655).

<u>Description of Work Subject to the Jurisdiction of the U.S. Army Corps of Engineers:</u> The applicant is proposing to fill 33.06 acres of wetland to facilitate the construction of a logistics center. The proposed project generally includes construction of site access, parking, buildings and stormwater management facilities. The proposed site plan includes site access from Highway 80. Five buildings will be constructed totaling

6,398,030 square feet. Truck parking and employee parking are provided on each side of the buildings. Nine ponds required to satisfy the stormwater management needs of the site are positioned at various locations throughout the property.

To offset the loss in aquatic function associated with the above impacts, the applicant has proposed the purchase of 99.2 wetland credits from a U.S. Army Corps of Engineers approved mitigation bank that services the Lower Ogeechee watershed (HUC 03060202).

BACKGROUND

The project site totals 763.84 acres and consists of habitat typical for Bryan County and the Coastal Plain of Georgia. An aquatic resources delineation was completed within the project site and the limits of jurisdiction have been field verified by the Corps. The project area contains 536.76 acres of upland, 208.45 acres of wetland and 0.73 acre of pond. These habitats generally include agricultural fields, clear cuts, cutover depressional wetlands and forested slope wetlands. Land management practices historically applied to the tract have included agriculture/farming and timber management. The majority of the timber within the property has been harvested at various times over the past 20 years and allowed to naturally regenerate. The site is now dominated by a regenerating community of pine and hardwood species.

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

<u>Water Quality Certification</u>: 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.

<u>State-owned Property and Resources</u>: 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.

<u>Georgia Coastal Management Program:</u> 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.

<u>Cultural Resources</u>: Review of the latest published version of the National Register of Historic Places (NRHP) and the Georgia Natural, Archeological and Historic Resources GIS database, indicates that no registered properties or properties listed as eligible for inclusion are located on the project site. The applicant as indicated that a Phase I cultural and archeological resources assessment is being prepared and a draft report will be submitted to the Corps and Georgia Department of Natural Resources-Historic Preservation Division for review and comment.

<u>Endangered Species</u>: A preliminary review the U.S. Fish and Wildlife Service (FWS) list of Endangered and Threatened Species (IPaC) indicates the following listed species may occur in the project area: Eastern black rail (*Laterallus jamaicensis spp.*); wood stork (*Mycteria Americana*); Eastern Indigo snake (*Drymarchon corais couperi*), gopher tortoise (*Gopherus polyphemus*); and the frosted flatwoods salamander (*Ambystoma cingulatum*).

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. In addition, we are requesting information from the FWS whether the project is within 2,500 feet of an active wood stork nesting colony.

<u>Public Interest Review</u>: The decision whether to issue a permit will be based on an evaluation of the probable impact including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors, which may be relevant to the proposal will be considered including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion

and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership and in general, the needs and welfare of the people.

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

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

<u>Public Hearing</u>: 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.

<u>Comment Period</u>: Anyone wishing to comment on this application for a Department of the Army permit should submit comments by email to sarah.e.wise@usace.army.mil. Alternatively, you may submit comments in writing to the Commander, U.S. Army Corps of Engineers, Savannah District, Attention: Sarah E. Wise, 100 West Oglethorpe Avenue, Savannah, Georgia 30401, 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. Sarah E. Wise, Team Lead, Coastal Branch at 912-652-5550.

Enclosures

West Port Logistics Center

SECTION 404 INDIVIDUAL PERMIT APPLICATION May 2021

Applicant: West Port Development Holdings, LLC

Agent: Resource & Land Consultants

Engineer: Thomas & Hutton





Table of Contents

1.0 Introduction	1
2.0 Background	1
3.0 Project Purpose & Need	2
4.0 Existing Site Conditions	2
5.0 Proposed Project & Development Plan	3
6.0 Alternative Analysis	3
6.1 No Action Alternative	4
6.2 Off-Site Alternatives	4
6.2.1 Applicants Preferred Site	4
6.2.2 Off-Site Alternative 1	5
6.2.3 Off-Site Alternative 2	5
6.2.4 Off-Site Alternative 3	6
6.2.5 Off-Site Alternative 4	6
6.2.6 Off-Site Alternative 5	6
6.2.7 Off-Site Alternative 6	7
6.2.8 Off-Site Alternative 7	7
6.2.9 Off-Site Alternative 8	7
6.2.10 Off-Site Alternative 9	8
6.2.11 Off-Site Alternative 10	8
6.2.12 Off-Site Alternative 11	9
6.2.13 Off-Site Alternative 12	9
6.2.14 Off-Site Alternative 13	10
6.2.15 Off-Site Alternative 14	10
6.2.16 Off-Site Alternative 15	10
6.2.17 Off-Site Alternative 16	11
6.2.18 Off-Site Alternative 17	
6.2.19 Off-Site Alternative 18	11
6.3 On-Site Configurations	
6.3.1 On-Site Configuration 1	
6.3.2 On-Site Configuration 2	
6.3.3 On-Site Configuration 3	
6.4 Alternatives Not Practicable or Reasonable	12
6.5 Review of Practicable Alternatives	
6.5.1 Proposed Action or Applicant's Preferred Alternative/On-Site Configuration	15
6.5.2 Off-Site Alternative 2	
6.5.3 Off-Site Alternative 4	16
6.5.4 Off-Site Alternative 5	
6.5.5 On-Site Configuration 1	
6.5.6 On-Site Configuration 2	
6.6 Summary of Alternatives Analysis	
7.0 Threatened & Endangered Species	
8.0 Cultural Resources	
9.0 Storm Water Management	21

0.0 Compensatory Mitigation	
1.0 Conclusion	
APPENDIX:	
: CESAS Form 19	
3: Figures/Site Maps	
C: USACE Jurisdictional Determination	
D: Permit Drawings (Applicant's Preferred Alternative	re)
: Off-Site Alternatives Information	
: On-Site Configurations	
G: Compensatory Mitigation Calculations	
H: IPaC Database & Edges Information	
: GNAHRGIS Public Database Information	
: Adjacent Landowner Information	
K: Industrial Market Data	

West Port Logistics Center Project Description May 2021

1.0 INTRODUCTION:

West Port Development Holdings, LLC is proposing the construction of the West Port Logistics Center located within northern Bryan County. The project site totals approximately 763.84 acres located adjacent to and south of Highway 80, north of Interstate 16, and west of Highway 280 within Bryan County, Georgia (32.207409°, -81.465592°). The project is located approximately 2 miles from Interstate 16, 17 miles from Interstate 95, 23 miles from Savannah/Hilton Head International Airport and 25 miles from the Port of Savannah.

2.0 BACKGROUND:

The regional market (Chatham, Effingham, Bryan, and Liberty Counties) currently contains over 78 million square feet of warehousing space. Competitive pricing structure, logistics management, access to U.S. markets, and access to global markets via the Savannah Port is a key draw for international processing and logistics companies. Market analysis adjusting for market downturns conservatively estimates the need for an additional 70 million square feet by 2030 to accommodate the 9 million TEU Port Expansion announced by Georgia Ports Authority (GPA) at the 2020 Georgia Foreign Trade Conference.

As documented in the attached market data "Savannah's industrial sector, once again, maintained a near record-low vacancy rate of 3.4%, representing the seventh consecutive year with a vacancy below 4.0% despite an overall market inventory increase of 30.9 million square feet (msf) since fourth quarter 2014. The below-average vacancy rate can be attributed to another record-breaking year of throughput and expansion at the GPA. Several notable leases were signed in Q1 posting a net absorption of 2.1 msf, Savannah's strongest first quarter on record. Currently, there is a total of 11.5 msf of new construction underway and scheduled for completion by year-end 2021 or early 2022".

In the 25 January 2021 press release GPA reported: "The Georgia Ports Authority moved more than 4.68 million twenty-foot equivalent container units in 2020, up 1.8 percent over its 2019 total of 4.59 million. Total cargo crossing all docks in 2020 reached 38.4 million tons. The Port of Savannah achieved its busiest December ever, moving 447,525 TEUs, an increase of 24 percent, or 86,700, compared to December 2019. Total cargo crossing all docks reached 3.33 million tons last month, up 12.5 percent. Rail volumes for the month grew 16.4 percent, or approximately 10,900 TEUs, for a total of 77,230. Intermodal cargo represented 17.4 percent of December container volumes." In the 15 April 2021 Press Release by GPA, "The Port of Savannah handled an all-time record of nearly 500,000 twenty-foot equivalent container units in March, an increase of more than 48 percent, or 162,275 TEUs, compared to the same month in 2020. "Every new container that moves through the Port of Savannah means new jobs for Georgia," said Gov. Brian Kemp. "The port and the entire logistics community continue to serve as an economic engine for Coastal Georgia and the entire state as we accelerate our economic recovery in the aftermath of the COVID-19 pandemic. This record-setting month proves that Georgia is open for business!" Counting the 498,000 TEUs moved in March, GPA wrapped up the third quarter with a fiscal year-to-date (July-March) total of 3.9 million TEUs, on track to top 5 million for the first time ever in a single year. "Over the past six months, unprecedented volumes have crossed our docks, but Georgia's logistics community and GPA's employees have risen to the occasion by working long hours and bringing on additional staff," said GPA Executive Director Griff Lynch."

Considering the projected needs for the Savannah Port industrial market, the applicant reviewed regional opportunities for development of a master planned logistics park and determined that Bryan County and more specifically the Interstate 16/Highway 280 interchange was the most appropriate location for the following reasons:

- Bryan County passed governor legislation to waive inventory tax on fulfillment/ecommerce facilities.
- Bryan County is within a Military zone which provides larger tax credit for job creation.
- Bryan County is investing over 30 million dollars into infrastructure to support growth (Cares EDA Funds).
- Northern Bryan County contains affordable living and lower taxes than other regional communities.
- As opposed to the Bryan County Interstate 95 corridor to the south, the Bryan County Interstate 16 corridor



avoids haul time and additional mileage because it is on the westbound travel corridor leading to mainland markets.

- The Interstate 16/Highway 280 interchange is the next closest exit which contains established industrial development and large adjacent tracts available for industrial expansion.
- Conflicts with heavily developed residential and retail commercial areas is avoided.

The proposed project will include facilities from 1,057,000 square feet to 1,860,000 square feet. This product types will allow the logistics center to satisfy current market needs of the community and businesses using the Port of Savannah. Warehousing and distribution businesses in port centric markets, as well as population centers/1st tier markets, are consistently seeking larger increments of space (i.e. 1MM sf and larger). A major factor affecting the demand for 1M SF buildings is the proliferation of e-commerce retailing which has only accelerated in response to COVID 19. Increase in e-commerce focused supply chains require larger buildings to warehouse the product, as well as shipping/sorting facilities within the same building. This is a trend that is heavily driven by the individual consumer who now expect to avoid the historical in-person retail store visit. Traditional shopping practices are consistently replaced with product purchase and return via online shopping portals, mobile shopping portals, etc. Online transactions are expected to encompass 50% of all retail sales in 2025, and the trend continuing to grow year-afteryear. In addition to the commerce factor, operational efficiency is required by today's shippers and importers. It is far more efficient to move import goods through a single contract provider (Third Party Logistics Provider "3PL's") than manufacturers constructing and operating their own warehouse and handling their own product. Hence the advent of 3PL's that provide the warehouse services for multiple customers. Rather than operating numerous smaller facilities within a single market, these 3PL's require larger facilities to gain operational efficiencies and serve multiple customers under one roof.

For the reasons above, Port of Savannah market including Chatham, Effingham, Bryan and Liberty Counties have experienced an increasing demand for larger buildings/industrial facilities. This trend has only accelerated in response to documented increase in e-commence demands. As noted on several occasions, stable and healthy markets maintain 8% to 10% vacancy rates. Q1 of 2021 will record vacancy rates below 3% and, based on pending construction deliveries and tenants currently searching for space in the Savannah market, the vacancy rates are not expected to exceed 4% anytime within the next 12 months.

3.0 PROJECT PURPOSE & NEED:

Generally, the project purpose is to provide warehousing and supply-chain distribution space to service the long-term needs of business operating within the Port of Savannah. Specifically, the purpose of the proposed project is to construct a large-scale master planned industrial logistics center within the vicinity of the Interstate 16/Highway 280 interchange to accommodate regional supply-chain requirements for Class A distribution and support warehousing needs associated with the current and anticipated growth of this region and the Savannah Port.

While this project and its proposed square footage represents less than 10 percent of the projected market need, the proposed logistics center will assist with maintaining a healthy regional market required to support the continued growth of the Savannah Port, while fully leveraging existing infrastructure.

4.0 EXISTING SITE CONDITIONS:

The project site totals 763.84 acres and consists of habitat typical for Bryan County and the Coastal Plain of Georgia. An aquatic resources delineation was completed within the project site and the limits of jurisdiction has been field verified by the U.S. Army Corps of Engineers (USACE. The project area contains 536.76 acres of upland, 208.45 acres of wetland and 0.73 acre of pond. These habitats generally include agricultural fields, clear cuts, cutover depressional wetlands and forested slope wetlands. Land management practices historically applied to the tract have included agriculture/farming and timber management. The majority of the timber within the property has been harvested at various times over the past 20 years and allowed to naturally regenerate. The site is now dominated by a regenerating community of pine and hardwood species.



5.0 PROPOSED PROJECT & DEVELOPMENT PLAN:

The proposed project generally includes construction of site access, parking, buildings, and stormwater management facilities. The proposed site plan includes site access from Highway 80. Five buildings will be constructed totaling 6,398,030 square feet. Truck parking and employee parking are provided on each side of the buildings. Nine ponds required to satisfy the stormwater management needs of the site are positioned at various locations throughout the property. Permit drawings depicting the proposed project are provided in Appendix D.

Due to the size of the warehouse buildings, location and layout of these facilities were restricted to areas within the property where larger development pods could be created. The applicant chose areas which maximize the use of upland and minimize impacts to wetlands to the greatest extent practicable. As depicted in the attached permit drawings, this proposed site plan requires 33.06 acres of wetland impacts including wetland impact for site access and wetland impact for general development fill (warehouse, parking, etc.).

6.0 ALTERNATIVES ANALYSIS:

As part of the overall project, the applicant completed a thorough alternatives analysis. A review of the 404(b)(1) guidelines indicates that "(a) Except as provided under section 404(b)(2), no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences." The guidelines define practicable alternatives as "(q) The term *practicable* means available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes."

The guidelines outline further consideration of practicable alternatives: "(1) For the purpose of this requirement, practicable alternatives include, but are not limited to: (i) Activities which do not involve a discharge of dredged or fill material into the waters of the United States or ocean waters; (ii) Discharges of dredged or fill material at other locations in waters of the United States or ocean waters; (2) An alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes. If it is otherwise a practicable alternative, an area not presently owned by the applicant which could reasonably be obtained, utilized, expanded, or managed to fulfill the basic purpose of the proposed activity may be considered."

Considering the guidelines above, the applicant evaluated a No Action Alternative and nineteen alternative sites including the applicant's preferred site. In addition, three on-site configurations were evaluated including the applicant's preferred on-site configuration. As noted above, the permit drawings depicting the proposed site plan are provided in Appendix D. Mapping information for off-site alternatives is provided in Appendix E and on-site configuration alternatives are provided in Appendix F. 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.

- Capable of being done considering cost (Is the cost reasonable considering scope and type of project considering total cost, funding source, profit margin, etc.)
- Capable of being done considering logistics (Must consider existing infrastructure, traffic patterns, etc.)
- Property can be reasonably obtained (Must consider availability, liens, etc.)
- Property can be reasonably expanded (Must consider ability to acquire adjacent lands for expansion.)
- Property can be reasonably managed (Must consider restrictions on management of the site.)
- Meets basic project purpose
- Meets overall project purpose

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. Due to the location of wetlands and proposed land use (industrial warehousing), it was determined that complete avoidance of wetland impacts was not feasible. Unlike many development activities (i.e. residential, recreational, or light commercial), little flexibility in warehouse design is afforded. Industry standards which dictate building widths and lengths and access, parking and docking requirements associated with semi-trailer truck traffic greatly limit design flexibility. For these reasons, major modifications to the facility footprint beyond reduction in square footage to the minimum square feet are not feasible. The presence of wetlands is not unique to the project site and when considering the geographic location of our coastal region, impacts to these resources would be required regardless of site location. Because the "no-action" alternative and complete avoidance of impacts prohibits construction of the proposed industrial park, this alternative was determined to be unreasonable and not practicable.
- **6.2 Off-Site Alternatives:** In addition to the seven general Practicability/ Reasonability Screening Selection Criteria evaluated, specific criteria including geographic location, size, zoning, utilities, access, and availability were considered. The following provides a summary of each criterion.
 - Geographic Location. The proposed project will provide warehousing and logistics services for Port related clients. Sites considered for the project were limited to the I-16 corridor of Chatham, Effingham, Bryan and Bulloch Counties.
 - Size. The proposed project includes construction of a master planned logistic park which includes construction of a variety of warehousing facilities. Due to the size of this industrial product, the minimum tract acreage for the alternatives analysis was 400 acres.
 - 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 a warehousing and distribution facility requires continual operation of large semitrailer trucks. For this project, two access criteria were established. First, the site must provide suitable access to a major interstate. Suitable access to a major interstate would be defined as direct access to the site from a paved road suitable to support truck traffic associated with the proposed facility. Second, the site must be located adjacent to or within two miles of an Interstate interchange. For this project, alternative sites were limited to major interchanges along Interstate 16.
 - Availability. Sites listed for sale and known to be available for purchase were considered as part of the alternative's analysis.
 - **6.2.1 Applicant's Preferred Site:** The applicant's preferred alternative totals 763.84 acres generally located between Highway 80, Interstate 16, and Highway 280 within Bryan County. The following provides a summary of each criterion reviewed for the applicants preferred site:
 - General Screening Criteria: This alternative is capable of being done when considering cost and logistics, the property can be reasonably obtained, expanded, and managed, and the project site meets the basic and overall project purpose.



- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site meets the minimum size criteria for the project.
- Zoning: The site is currently zoned for the proposed use.
- Utilities: All required utilities are easily extended to the site.
- Access: The site has suitable access with paved road frontage along three public roads and direct access to Interstate 16.
- Availability: The site is currently listed for sale and can be purchased.

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

6.2.2 Off-Site Alternative 1: This tract totals approximately 800 acres located adjacent to and north of Highway 80 and west of Highway 280 in Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property cannot be reasonably obtained, expanded, and managed. The property is not available for sale and is currently under development.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals approximately 800 acres which meets the minimum size criteria for the project.
- Zoning: The site is currently zoned for the proposed use.
- Utilities: All required utilities are easily extended to the site.
- Access: The site has suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 1 does not meet all the site screening criteria and is therefore not a practicable alternative.

6.2.3 Off-Site Alternative 2: This tract totals 536 acres and located adjacent to and north of Highway 80 and west of Highway 280 within Bryan, Georgia. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics, the property can be reasonably obtained, expanded, and managed, and the project site meets the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 536 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use: however, rezoning of the property is assumed to be feasible.
- Utilities: All required utilities are easily extended to the site.
- Access: The site has suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: Although the site is not currently listed for sale, it is assumed that the property could be purchased, and the owner would be a willing seller.

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



6.2.4 Off-Site Alternative 3: This tract totals 507 acres and is located east of Highway 280 south of Old Cuyler Road and north of Oracal Parkway within Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property cannot be reasonably obtained, expanded, and managed. This property is under contract for purchase and is not available for purchase.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals approximately 507 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use: however, rezoning of the property is assumed to be feasible.
- Utilities: All required utilities are easily extended to the site.
- Access: The site has suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As noted above, the site is not currently listed for sale and cannot be purchased.

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

6.2.5 Off Site Alternative 4: This tract totals 540 acres located adjacent to and east of Old Cuyler Road and south of Highway 280 within Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics, the property can be reasonably obtained, expanded, and managed, and the project site meets the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 540 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use: however, rezoning of the property is assumed to be feasible.
- Utilities: All required utilities are easily extended to the site.
- Access: The site has suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: Although the site is not currently listed for sale, it is assumed that the property could be purchased, and the owner would be a willing seller.

In summary, Off-Site Alternative 4 meets all the site screening criteria and is therefore a practicable alternative.

6.2.6 Off Site Alternative 5: This tract totals 1,112 acres located adjacent to and north of Old Cuyler Road and east of Highway 280 within Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics, the property can be reasonably obtained, expanded, and managed, and the project site meets the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.



- Size: The site totals 1,112 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use: however, rezoning of the property is assumed to be feasible.
- Utilities: All required utilities are easily extended to the site.
- Access: The site has suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: Although the site is not currently listed for sale, it is assumed that the property could be purchased, and the owner would be a willing seller.

In summary, Off-Site Alternative 5 meets all the site screening criteria and is therefore a practicable alternative.

6.2.7 Off Site Alternative 6: This tract totals 837 acres located adjacent to and south of Interstate 16, north of Tar City Road and west of Highway 280 in Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property cannot be reasonably obtained, expanded, and managed. This tract is currently associated with a large Joint Development Authority OEM Project. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 837 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use: however, rezoning of the property is assumed to be feasible.
- Utilities: All required utilities are easily extended to the site.
- Access: The site has suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 6 does not meet all the site screening criteria and is not a practicable alternative.

6.2.8 Off Site Alternative 7: This tract totals 1,435 acres located adjacent to and south of Tar City Road and west of Highway 280 in Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property cannot be reasonably obtained, expanded, and managed. This tract is currently associated with a large Joint Development Authority OEM Project. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 1,435 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use: however, rezoning of the property is assumed to be feasible.
- Utilities: All required utilities are easily extended to the site.
- Access: The site has suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.



In summary, Off-Site Alternative 7 does not meet all the site screening criteria and is not a practicable alternative.

6.2.9 Off Site Alternative 8: This tract totals 697 acres located adjacent to and east/west of Tar City Road and south of Interstate 16 in Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 697 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use: however, rezoning of the property is assumed to be feasible.
- Utilities: All required utilities are available for extension to the site.
- Access: The site does not have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 8 does not meet all the site screening criteria and is not a practicable alternative.

6.2.10 Off Site Alternative 9: This site totals approximately 1,228 acres located south of interstate 16 and east of Olive Branch Road in Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 1,228 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use and due to the location, would not likely be rezoned.
- Utilities: All required utilities are available for extension to the site.
- Access: The site does not have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 9 does not meet all the site screening criteria and is not a practicable alternative.

6.2.11 Off Site Alternative 10: This site totals approximately 400 acres located in Bryan County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 400 acres which meets the minimum size criteria for the project.



- Zoning: The site is not currently zoned for the proposed use and due to the location, would not likely be rezoned.
- Utilities: All required utilities are available for extension to the site.
- Access: The site does not have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 10 does not meet all the site screening criteria and is not a practicable alternative.

6.2.12 Off Site Alternative 11: This site totals 768 acres located adjacent to and south of Highway 80, northeast of Medrim in Effingham County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Effingham County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 768 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use and due to the location, would not likely be rezoned.
- Utilities: The site does not afford water and sewer capacity required to support the project
- Access: The site does not have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 11 does not meet all the site screening criteria and is not a practicable alternative.

6.2.13 Off Site Alternative 12: This site totals 1,502 acres located adjacent to and east of Old River Road and north of Interstate 16 within Effingham County. The following provides a summary of each criterion reviewed for this off-site alternative:

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Effingham County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 1,502 acres which meets the minimum size criteria for the project.
- Zoning: The site is currently zoned for the proposed use.
- Utilities: The site does not afford water and sewer capacity required to support the project
- Access: The site does have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: The site is owned by the Effingham County Development Authority and is not available for purchase.

In summary, Off-Site Alternative 12 does not meet all the site screening criteria and is not a practicable alternative.

6.2.14 Off Site Alternative 13: This site totals approximately 631 acres located in south of Interstate 16 and east of Old River Road within



- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Chatham County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 631 acres which meets the minimum size criteria for the project.
- Zoning: The site is currently zoned for the proposed use.
- Utilities: Utility services are available within the general vicinity of the site and could be extended to the site.
- Access: The site does have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: The property is not available for purchase.

In summary, Off-Site Alternative 13 does not meet all the site screening criteria and is not a practicable alternative.

6.2.15 Off Site Alternative 14: This site totals approximately 581 acres located in Chatham County and was not available for purchase.

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Chatham County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 581 acres which meets the minimum size criteria for the project.
- Zoning: The site is currently zoned for the proposed use.
- Utilities: Utility services are available within the general vicinity of the site and could be extended to the site.
- Access: The site does have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: The property is owned by the Savannah Economic Development Authority and is not available for purchase.

In summary, Off-Site Alternative 14 does not meet all the site screening criteria and is not a practicable alternative.

6.2.16 Off Site Alternative 15: This site totals approximately 490 acres located south of Interstate 16 and west of Old River Road in Chatham County.

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Chatham County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 490 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use and due to the location would not be rezoned for the proposed use.
- Utilities: Utilities are currently available for expansion to the project site.
- Access: The site does not have suitable access with paved road frontage and direct public road
- Availability: As indicated above, the property is not available for purchase.



Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 15 does not meet all the site screening criteria and is not a practicable alternative.

6.2.17 Off Site Alternative 16: This site totals approximately 680 acres located adjacent to and west of the Ogeechee River and north of Highway 204 within Bryan County.

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 680 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use and due to the location would not be rezoned for the proposed use.
- Utilities: Due to the location of the site water and sewer capacity required to support the project is not afforded.
- Access: The site does not have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 16 does not meet all the site screening criteria and is not a practicable alternative.

6.2.18 Off Site Alternative 17: This site totals approximately 3,300 acres located north of Interstate 16 and east of Ash Branch Church Road within Bulloch County.

- General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.
- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 3,300 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use and due to the location would not be rezoned for the proposed use.
- Utilities: Due to the location of the site water and sewer capacity required to support the project is not afforded.
- Access: The site does not have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 17 does not meet all the site screening criteria and is not a practicable alternative.

6.2.19 Off Site Alternative 18: This site totals approximately 568 acres located south of Interstate 16 and east of Ash Branch Church Road in Bulloch County.

 General Screening Criteria: This alternative is capable of being done when considering cost and logistics: however, the property is not for sale and therefore cannot be reasonably obtained. For this reason, the project site does not meet the basic and overall project purpose.



- Geographic Location: The site is located within Bryan County within the vicinity of Interstate 16 and meets the geographic location requirements.
- Size: The site totals 568 acres which meets the minimum size criteria for the project.
- Zoning: The site is not currently zoned for the proposed use and due to the location would not be rezoned for the proposed use.
- Utilities: Due to the location of the site water and sewer capacity required to support the project is not afforded.
- Access: The site does not have suitable access with paved road frontage and direct public road access to Interstate 16.
- Availability: As indicated above, the property is not available for purchase.

In summary, Off-Site Alternative 18 does not meet all the site screening criteria and is not a practicable alternative.

- **6.3 On-Site Configurations:** In addition to considering off-site alternatives, the applicant considered on-site alternatives. The following provides a summary of each alternative considered during the design review process.
 - **6.3.1 On-Site Configuration 1:** This configuration was the initial site plan reviewed by the applicant and maximizes the warehousing footprint within the property. The general site plan includes seven buildings ranging from 1,311,000 square feet to 2,250,000 square feet, nine stormwater detention basins, truck access and parking and employee parking. This configuration totals 11,433,250 square feet of warehouse space.
 - **6.3.2 On-Site Configuration 2:** This configuration was reviewed by the applicant in an effort to reduce the overall aquatic resource impact. The design includes five buildings ranging from 1,311,000 square feet to 1,860,000 square feet, six stormwater detention basins, truck access and parking and employee parking. This configuration totals 7,683,250 square feet of warehouse space.
 - **6.3.3 Onsite Configuration 3 (Applicant's Preferred):** This configuration is the applicants preferred alternative. This site plan was specifically designed to minimize impacts to the greatest extent practicable. The design includes five buildings ranging from 1,057,000 square feet to 1,467,750 square feet, eight stormwater detention basins, truck access and parking and employee parking. This configuration totals 6,398,030 square feet of warehouse space.
- **6.4 Alternatives Not Practicable or Reasonable:** Following review of both off site alternatives and onsite 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	Alt 1	Alt2	Alt 3	Alt 4	Alt 5	Alt6	Alt 7	Alt 8	Alt 9	Alt 10	Alt 11	Alt 12	Alt 13	Alt 14	Alt 15	Alt 16	Alt 17	Alt 18	On-Site Configuration Alt 1	On-Site Configuration Alt 2	On-Site Configuration Alt 3 (Applicant's Preferred)	No Action
Capable of being done considering general screening criteria	Yes	No	Yes	No	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	Yes	Yes	Yes	No
Capable of being done considering geographic location	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Capable of being done considering size	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Capable of being done considering zoning	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	Yes	Yes	Yes	No	No	No	No	Yes	Yes	Yes	No
Capable of being done considering utilities	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes	No	Yes	No	No	No	Yes	Yes	Yes	No
Capable of being done considering access	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	No	No	No	Yes	Yes	No	No	No	No	No	Yes	Yes	Yes	No
Capable of being done considering availability	Yes	No	Yes	No	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	Yes	Yes	Yes	No
Practicable Site (Y or N)	Yes	No	Yes	No	Yes	Yes	No	No	No	No	No	No	No	No	No	No	No	No	No	Yes	Yes	Yes	No

- **6.5 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:
- <u>Stream Impacts (quantitative)</u>. The estimated linear footage of potential stream impact was evaluated for each practicable alternative.
- <u>Stream Impacts (qualitative)</u>. 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.
- <u>Wetland Impacts (quantitative)</u>. 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.
- <u>Impacts to Other Waters (quantitative)</u>. 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).
- <u>Federally Listed Threatened or Endangered Species</u>. 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.
- <u>Cultural Resources</u>. A preliminary assessment of cultural resources was conducted for each site by reviewing available State Historic Preservation Office information. Potential impacts to sites listed or eligible for listing on the National Register of Historic Places was noted for each alternative.
- <u>Stream Buffer Impact</u>. 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 five alternatives consisting of three alternative sites (including the applicants preferred site) and three alternative on-site configurations (including the applicants preferred on-site configuration). The following provides a summary of each practicable alternative and associated environmental impacts.

6.5.1 Proposed Action or Applicant's Preferred Alternative/On-site Configuration 3: This configuration is the applicants preferred alternative. This site plan was specifically designed to minimize impacts to the greatest extent practicable. The design includes five buildings ranging from 1,057,000 square feet to 1,467,750 square feet, eight stormwater detention basins, truck access and parking and employee parking. This configuration totals 6,398,030 square feet of warehouse space. A summary of environmental impacts associated with this on-site configuration is provided below.

- <u>Stream Impacts (quantitative</u>). Not applicable. No streams are located within the property.
- <u>Stream Impacts (qualitative)</u>. Not applicable.
- Wetland Impacts (quantitative). Based on the NWI, approximately 13.2 acres of wetland would be impacted by the proposed project. The aquatic resources delineation that has been completed within the project area indicates 33.06 acres of jurisdictional wetland impact be required for this and on-site configuration.
- Wetland Function (qualitative). Field review of the site documents wetland areas within the property have been impacted by past land management practices including installation of roads, installation of drainage ditches, and timber harvesting. The majority of wetland area within this tract has been harvested at various times over the past 20 years and as recent as 2019. For this reason, functional value of the wetland areas that would be impacted by this alternative was assigned a moderate value.
- <u>Impacts to Other Waters (quantitative)</u>. No other waters are identified on the NWI nor the U.S. Geological Topographic Survey within the project area.
- Other Waters Functions (qualitative). Not Applicable.
- <u>Federally Listed Threatened or Endangered Species</u>. Based on review of the U.S. Fish and Wildlife Information for Planning and Consultation (IPaC), no impacts to federally listed species are known to occur within this site.
- <u>Cultural Resources</u>. Upon review of GNAHRGIS, the property does not contain any cultural or archaeological sites. Brockington & Associates has been retained to complete a Phase I cultural and archeological resources assessment. A draft report will be prepared and submitted to the USACE and GADNR-HPD for review.
- <u>Stream Buffer Impact</u>. Not applicable. No streams are located within this property.
- <u>Floodplain Impacts</u>: Based on review of available FEMA maps, 24.3 acres of floodplain would be impacted by the proposed project.
 - **6.5.2 Off-Site Alternative 2:** This tract totals 526 acres and the NWI indicates this alternative contains 362.2 acres of wetland, 14,500 linear feet of tributary (Ogeechee River and Miles Branch) and 163.8 acres of upland. A summary of environmental impacts associated with this on-site configuration is provided below.



- <u>Stream Impacts (quantitative)</u>. The NWI and USGS Topographic Survey indicate that the only tributaries located within the property are the Ogeechee River, located on the northern and eastern boundary of the property and Miles Branch located on the western boundary. No impacts to these tributaries would occur during site development and therefore, no stream impacts are associated with this alternative.
- <u>Stream Impacts (qualitative)</u>. Not applicable.
- Wetland Impacts (quantitative). The development footprint associated with the proposed project totals approximately 532.3 acres. Based on the NWI, all 362.2 acres of wetland would be impacted by the construction of similar sized project that produces approximately 6,000,000 square feet of distribution space.
- <u>Wetland Function (qualitative)</u>. Review of aerial photography indicates that wetland areas within the property have been impacted by past land management practices including installation of roads, installation of drainage ditches, and timber harvesting. The majority of wetland area within this tract has been harvested within the past 5 years. For this reason, functional value of the wetland areas that would be impacted by this alternative was assigned a moderate value.
- <u>Impacts to Other Waters (quantitative)</u>. Based on the NWI, no other waters are present within the property and no impacts to other waters would be required.
- Other Waters Functions (qualitative). Not applicable.
- <u>Federally Listed Threatened or Endangered Species</u>. Based on review of the U.S. Fish and Wildlife Information for Planning and Consultation (IPaC), 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.
- <u>Cultural Resources</u>. Upon review of GNAHRGIS 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.
- <u>Stream Buffer Impact</u>. Not applicable.
- <u>Floodplain Impacts</u>: Based on review of available FEMA maps, this alternative would require an estimated 351 acres acres of floodplain impacts to facilitate development of the proposed logistics center.
 - **6.5.3 Off-Site Alternative 4:** This tract totals 540 acres and the NWI indicates this alternative contains 169.6 acres of wetland, 2,900 linear feet of tributary (Ogeechee River) and 370.4 acres of upland. A summary of environmental impacts associated with this on-site configuration is provided below.
- <u>Stream Impacts (quantitative)</u>. The NWI and USGS Topographic Survey indicate that the only tributary located within the property is the Ogeechee River, located on the eastern boundary. No impacts to this tributary would occur during site development and therefore, no stream impacts are associated with this alternative.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). The development footprint associated with the proposed project totals approximately 532.3 acres. Based on the NWI, all 169.6 acres of wetland would be impacted by the construction of similar sized project that produces approximately 6,000,000 square feet of distribution space.



- Wetland Function (qualitative). Review of aerial photography indicates that wetland areas within the
 property have been impacted by past land management practices including installation of roads,
 installation of drainage ditches, and timber harvesting. The majority of wetland area within this tract has
 been harvested within the past 5 years. For this reason, functional value of the wetland areas that would
 be impacted by this alternative was assigned a moderate value.
- <u>Impacts to Other Waters (quantitative)</u>. Based on the NWI, no other waters are present within the property and no impacts to other waters would be required.
- Other Waters Functions (qualitative). Not applicable.
- <u>Federally Listed Threatened or Endangered Species</u>. Based on review of the U.S. Fish and Wildlife Information for Planning and Consultation (IPaC), 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.
- <u>Cultural Resources</u>. Upon review of GNAHRGIS 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. Not applicable.
- <u>Floodplain Impacts</u>: Based on review of available FEMA maps, this alternative would require an estimated 208 acres of floodplain impacts to facilitate development of the proposed logistics park.
 - **6.5.4 Off-Site Alternative 5:** This tract totals 1,112 acres and the NWI indicates this alternative contains 600.2 acres of wetland, 23,000 linear feet of tributary (Ogeechee River) and 511.8 acres of upland. A summary of environmental impacts associated with this on-site configuration is provided below.
- <u>Stream Impacts (quantitative)</u>. <u>Stream Impacts (quantitative)</u>. The NWI and USGS Topographic Survey indicate that the only tributary located within the property is the Ogeechee River, located on the eastern boundary. No impacts to this tributary would occur during site development: therefore, no stream impacts are associated with this alternative.
- <u>Stream Impacts (qualitative)</u>. Not applicable.
- Wetland Impacts (quantitative). The development footprint associated with the proposed project totals
 approximately 532.3 acres. Based on the NWI, approximately 79.4 acres of wetland would be impacted by
 the construction of similar sized project that produces approximately 6,000,000 square feet of distribution
 space.
- <u>Wetland Function (qualitative)</u>. Review of aerial photography indicates that wetland areas within the property have been impacted by past land management practices including installation of roads, installation of drainage ditches, and timber harvesting. The majority of wetland area within this tract has been harvested within the past 5 years. For this reason, functional value of the wetland areas that would be impacted by this alternative was assigned a moderate value.
- <u>Impacts to Other Waters (quantitative)</u>. Based on the NWI, no other waters are present within the property and no impacts to other waters would be required.
- Other Waters Functions (qualitative). Not applicable.



- <u>Federally Listed Threatened or Endangered Species</u>. Based on review of the U.S. Fish and Wildlife Information for Planning and Consultation (IPaC), 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.
- <u>Cultural Resources</u>. Upon review of GNAHRGIS 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. Not applicable.
- <u>Floodplain Impacts</u>: Based on review of available FEMA maps, this alternative would require an estimated 250 acres of floodplain impacts to facilitate development of the proposed logistics center.
 - **6.5.5 On-Site Configuration 1:** This configuration was the initial site plan reviewed by the applicant and maximizes the warehousing footprint within the property. The general site plan includes seven buildings ranging from 1,311,000 square feet to 2,250,000 square feet, nine stormwater detention basins, truck access and parking and employee parking. This configuration totals 11,433,250 square feet of warehouse space. A summary of environmental impacts associated with this on-site configuration is provided below.
- Stream Impacts (quantitative). Not applicable. No streams are located within the property.
- <u>Stream Impacts (qualitative)</u>. Not applicable.
- <u>Wetland Impacts (quantitative)</u>. Based on the NWI, approximately 108.8 acres of wetland would be impacted by the proposed project. The aquatic resources delineation that has been completed within the project area indicates 92.71 acres of wetland impact be required for this and on-site configuration.
- Wetland Function (qualitative). Field review of the site documents wetland areas within the property have been impacted by past land management practices including installation of roads, installation of drainage ditches, and timber harvesting. The majority of wetland area within this tract has been harvested at various times over the past 20 years and as recent as 2019. For this reason, functional value of the wetland areas that would be impacted by this alternative was assigned a moderate value.
- <u>Impacts to Other Waters (quantitative)</u>. No other waters are identified on the NWI nor the U.S. Geological Topographic Survey within the project area. However, several silvicultural/agricultural ditches were identified during the formal aquatic resource delineation and 1.35 acres of ditch will be impacted by this on-site configuration.
- Other Waters Functions (qualitative). The functional value of these man-made drainage ditches is low.
- <u>Federally Listed Threatened or Endangered Species</u>. Based on review of the U.S. Fish and Wildlife Information for Planning and Consultation (IPaC), no impacts to federally listed species are known to occur within this site.
- <u>Cultural Resources</u>. Upon review of GNAHRGIS, the property does not contain any cultural or archaeological sites. Brockington & Associates has been retained to complete a Phase I cultural and archeological resources assessment. A draft report will be prepared and submitted to the USACE and GADNR-HPD for review.



- Stream Buffer Impact. Not applicable. No streams are located within this property.
- <u>Floodplain Impacts</u>: Based on review of available FEMA maps, 92.71 acres of floodplain would be impacted by the proposed project.
 - **6.5.6 On-Site Configuration 2:** This configuration was reviewed by the applicant in an effort to reduce the overall aquatic resource impact. The design includes five buildings ranging from 1,311,000 square feet to 1,860,000 square feet, six stormwater detention basins, truck access and parking and employee parking. This configuration totals 7,683,250 square feet of warehouse space. A summary of environmental impacts associated with this on-site configuration is provided below.
- Stream Impacts (quantitative). Not applicable. No streams are located within the property.
- <u>Stream Impacts (qualitative)</u>. Not applicable.
- <u>Wetland Impacts (quantitative)</u>. Based on the NWI, approximately 29.7 acres of wetland would be impacted by the proposed project. The aquatic resources delineation that has been completed within the project area indicates 56.4 acres of wetland impact be required for this and on-site configuration.
- <u>Wetland Function (qualitative)</u>. Field review of the site documents wetland areas within the property have been impacted by past land management practices including installation of roads, installation of drainage ditches, and timber harvesting. The majority of wetland area within this tract has been harvested within the past 10 years and as recent as 2019. For this reason, functional value of the wetland areas that would be impacted by this alternative was assigned a moderate value.
- <u>Impacts to Other Waters (quantitative)</u>. No other waters are identified on the NWI nor the U.S. Geological Topographic Survey within the project area.
- Other Waters Functions (qualitative). Not Applicable.
- <u>Federally Listed Threatened or Endangered Species</u>. Based on review of the U.S. Fish and Wildlife Information for Planning and Consultation (IPaC), no impacts to federally listed species are known to occur within this site.
- <u>Cultural Resources</u>. Upon review of GNAHRGIS, the property does not contain any cultural or archaeological sites. Brockington & Associates has been retained to complete a Phase I cultural and archeological resources assessment. A draft report will be prepared and submitted to the USACE and GADNR-HPD for review.
- <u>Stream Buffer Impact</u>. Not applicable. No streams are located within this property.
- <u>Floodplain Impacts</u>: Based on review of available FEMA maps, 46.7 acres of floodplain would be impacted by the proposed project.

6.6 Summary of Alternatives Analysis: When comparing the practicable alternatives, the Applicant's Preferred Alternative requires less wetland, open water, and floodplain impacts 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	Off-Site	Off-Site	Off-Site Alt	On-Site Conf	On-Site	
Environmental Factors	Alternative & Configuration	Alt 2	Alt 4	5	1	Conf 2	
Stream Impacts (Linear Feet)	None	None	None	None	None	None	
Functional Value of Impacted Stream	N/A	N/A	N/A	N/A	N/A	N/A	
Wetland Impacts (Acres) NWI/Delineation	13.2/33.06	362.2	169.6	79.4	108.8/123.67	29.7/56.4	
Functional Value of Impacted Wetland	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate	
Impacts to Other Waters (Acres) NWI/Delineation	None	None	None	None	None	None	
Functional Value of Impacted Other Waters	N/A	N/A	N/A	Moderate	N/A	N/A	
Federal Endangered Species Impact	Not Likely	Not Likely	Not Likely	Not Likely	Not Likely	Not Likely	
Cultural Resources Impact	Not Likely	Not Likely	Not Likely	Not Likely	Not Likely	Not Likely	
Stream Buffer Impact	No	No	No	No	No	No	
Floodplain Impact (Acres)	24.3	351	208	250	92.71	46.7	
LEDPA	Yes	No	No	No	No	No	

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. Specific to the on-site configurations, the applicant reduced the overall aquatic resource impacts by 90.61 acres through the proposed design and facility layout and the 5,035,220 square foot reduction in building size and footprint.

7.0 THREATENED AND 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 in an effort 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 Bryan 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 from July-August 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:

Upon review of GNAHRGIS, the property does not contain any cultural or archaeological sites. Brockington & Associates has been retained to complete a Phase I cultural and archeological resources assessment. A draft report will be prepared and submitted to the USACE and GADNR-HPD for review.



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, the preliminary plan includes construction of stormwater ponds designed to accommodate the stormwater volume associated with development of the site. The final plan will meet 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

The proposed project requires 33.06 acres of aquatic resource impacts. As documented in the attached mitigation credit calculations, the project will require 198.4 grandfathered wetland mitigation credits are required to off-set aquatic resource impacts. As compensatory mitigation, the applicant is proposing to preserve 175.39 acres of wetland within the property. Upon approval of the project and prior to initiation of any permitted fill activities, the applicant will establish an irrevocable restrictive covenant on the preservation area. Prior to recording the covenants, a draft copy of the covenant language, using the Savannah District Model Language, and covenant exhibit will be prepared and submitted to the USACE for review and approval. Following approval, the applicant will record the covenants and provide the USACE with a final stamped copy. The boundary of all preservation areas will be posted with appropriate signage that clearly identifies the preservation area. In addition to the on-site preservation, the applicant has also proposed to purchase 99.2 mitigation credits from a USACE approved mitigation bank to be purchased prior to initiation of authorized activities. The proposed compensatory mitigation plan fully compensates for all impacts.

11.0 CONCLUSION

West Port Development Holdings, LLC is proposing the development of a logistics center south of Highway 80, west of Highway 280, and north of Interstate 16 within Bryan County, Georgia. The industrial warehousing complex will contain approximately 6,398,030 square feet of warehouse space which will serve the Port of Savannah and the Bryan County Interstate 16 corridor. As compensatory mitigation for the 33.06 acres of wetland impact, the applicant is proposing to preserve all undisturbed wetlands within the project site and purchase 99.2 grandfathered credits from an approved wetlands mitigation bank. The proposed project is the result of numerous development plan reviews during which the applicant was able to further avoid and minimize wetland impacts. All development activities will be conducted using best management practices to prevent secondary impacts to remaining wetland areas.



APPENDIX A: 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

TNSTRUCTIONS 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. West Port Development Holdings, LLC. Attn: Mr. Mark Hall 347 Abercorn Street Savannah, Georgia 31401 912.507.1732 mhall@northpointdev.com
5.	Location where the proposed activity exists or will occur.

Lat.32.207409° Long.-81.465592°

Bryan		Blitchton
County	Military District In	City or Town
Near City or Town	Subdivision	Lot No.
		Georgia
Lot Size	Approximate Elevation of Lot	State
	Black Creek	
Name of Waterway	Name of Nearest Creek, River, Sound	l, Bay or Hammock

CESAS Form 19 6. Name, address, and title of applicant's authorized agent for permit application coordination. Resource & Land Consultants Attn: Alton Brown, Jr. 41 Park of Commerce Drive, Suite 303 (912) 443-5896 Savannah, Georgia 31405 Statement of Authorization: I Hereby designate and authorize the above named person to act in my behalf as my agent in the processing of this permit application and to furnish, upon request, supplemental information in support of this application. Describe the proposed activity, its purpose and intended use, including a description of the type of structures, if any to be erected on fills, piles, of float-supported platforms, and the type, composition and quantity of materials to be discharged or dumped and means of conveyance. If more space is needed, use remarks section on page 4 or add a supplemental sheet. (See Part III of the Guide for additional information required for certain activities.) See Attached Project Description Public Commercial X Other Proposed use: Private 9. Names and addresses of adjoining property owners whose property also adjoins the waterway. 10. Date activity is proposed to commence. Upon receipt of authorization to proceed. Date activity is expected to be completed. Within 20 years of authorization to proceed. 11. Is any portion of the activity for which authorization is sought now complete A. If answer is "Yes", give reasons in the remarks in the remarks section. Indicate the existing work on the drawings. B. If the fill or work is existing, indicate date of commencement and completion.

C. If not completed, indicate percentage completed.

12. List of approvals or certifications required by other Federal, State or local agencies for any structures, construction discharges, deposits or other activities described in this application. Please show zoning approval or status of zoning for this project.

Issuing Agency Type Approval Identification No. Date/Application Date/Approval 401 Certification Concurrent Under Review

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 fa	acilitate constr	ruction of an ma	aster planned logist	ics center
	1. Access channel :	length	depth	width	
	2. Boat basin :	length	depth	width	
	3. Fill area : see attached	length	depth	width	
	4. Other: Excavation Area:	length	depth	width	
В.	1.If bulkhead, give dimensions	N/A			_
	2.Type of bulkhead construction (ma	aterial) N/A			_
	Backfill required: Yes No	Cubic ya	irds		
	Where obtained				_
C. Exc	avated material :				
	1.Cubic yards N/A				_
	2.Type of material N/A				_
15.Type of con	struction equipment to be used Mecha				_
A. Doe	s the area to be excavated include a	ny wetland? Ye	sNo_X		
	s the disposal area contain any wetland dge disposal site.	d? Yes No	X Projec	t does not include co	nstruction
C. Loc	ation of disposal area <u>N/A</u>				_
c.	Maintenance dredging, estimated amoutilized: N/A				_
E. Wil	l dredged material be entrapped or e				_
	l wetlands be crossed in transportin				- -
G. Pre	sent rate of shoreline erosion (if k	nown) <u>N/A</u>			_
the State of Ge to any specifi generally suff	TITY CERTIFICATION: In some cases, For orgia be obtained prior to issuance of a confidence of the confidence of the permitted by the permitted for the Georgia Environmental Figure 1 is not applicable to a specific project	a Federal license nitting Federal Protection Divis	e or permit. Apparent of the interior of the i	plicability of this r nformation requested th a certification if	equirement d below is required.
A. Ple	ase submit the following: 1. A plan showing the location and	size of any fac	rility, existin	g or propose	d. for
handling any	sanitary or industrial wast				u, 101
	2. A plan of the existing or propor for which permits are being reques		your adjacent	property	
	3. A plan showing the location oils, cleaners) used and stored. An be no storm drain catch basins we petro-chemical transfer lines a	ny above-ground a vithin the dike	storage areas m d areas. All		ere should

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.

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.

- B. Please provide the following statements:
 - A statement that all activities will be performed in a manner to minimize turbidity in the stream.
 - A statement that there will be no oils or other pollutants released from the proposed activities which will reach the stream.
 - 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 posses the authority to under take 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.

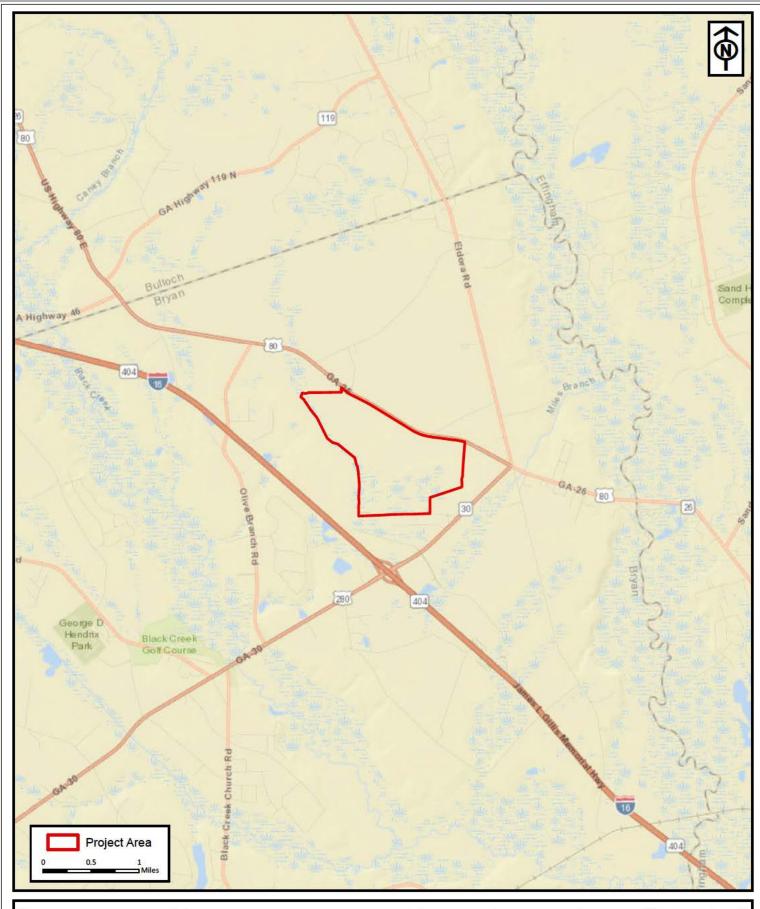
PRIVACY ACT NOTICE

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 B:
Figures/Site Maps
- Non-colored maps



 RLC Project No.: 19-304.2

 Figure No.:
 1

 Prepared By:
 AB

 Sketch Date:
 4/29/2021

 Map Scale:
 1 inch = 5,280 feet

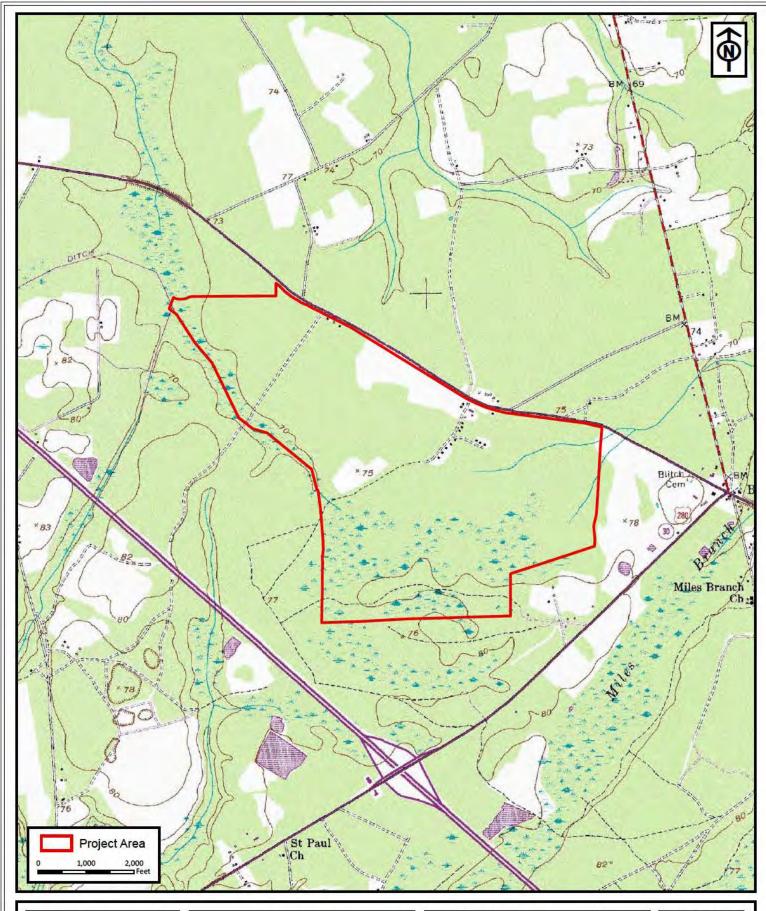
West Port Logistics Center

Bryan County, Georgia

Project Location Map

Prepared For: West Port Development Holdings





 RLC Project No.:
 19-304.2

 Figure No.:
 2

 Prepared By:
 AB

 Sketch Date:
 4/29/2021

 Map Scale:
 1 inch = 2,000 feet

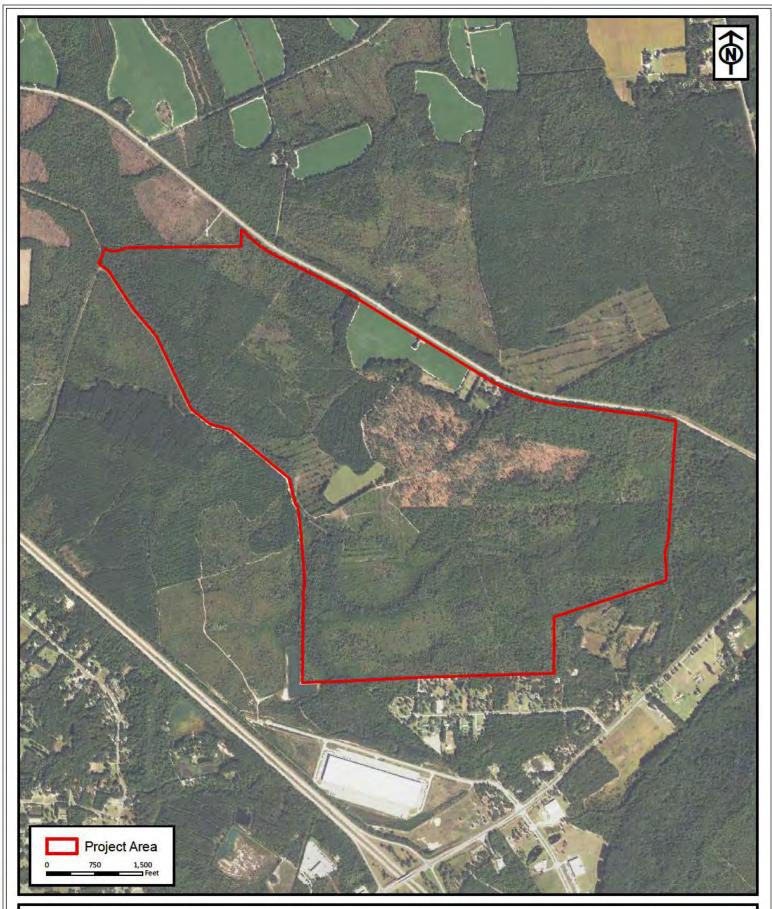
West Port Logistics Center

Bryan County, Georgia

USGS Topographic Map

Prepared For: West Port Development Holdings





RLC Project No.: 19-304.2

Figure No.: 3

Prepared By: AB

Sketch Date: 4/29/2021

Map Scale: 1 inch = 1,500 feet

West Port Logistics Center

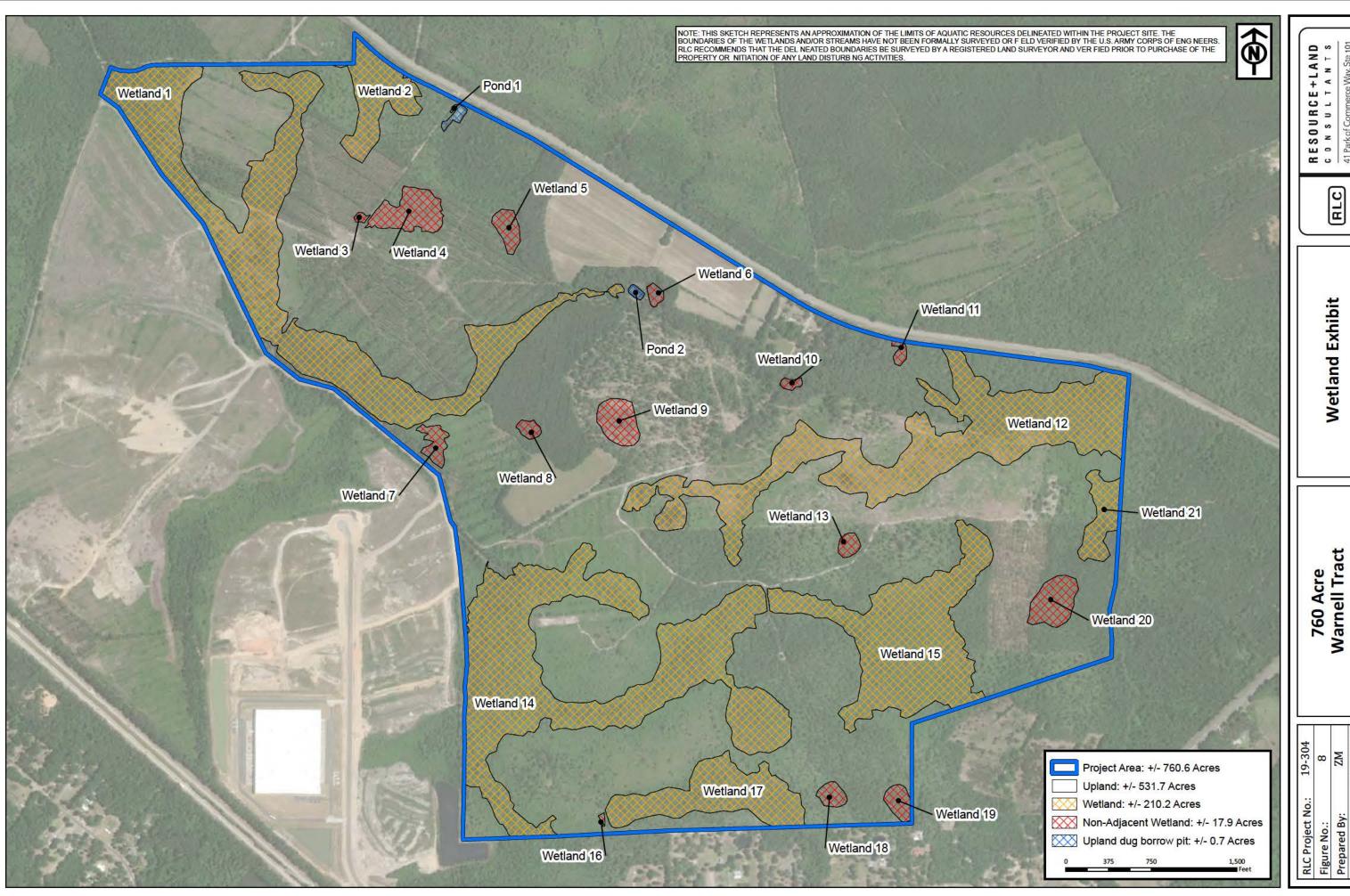
Bryan County, Georgia

2015 Ortho Aerial

Prepared For: West Port Development Holdings



APPENDIX C:
USACE Jurisdictional Determination



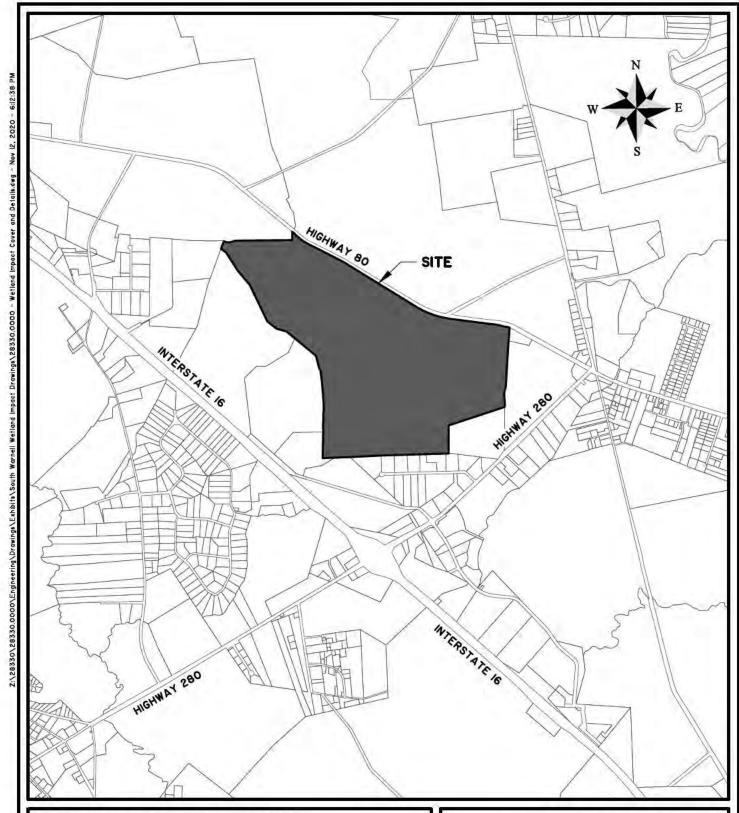
RLC

Wetland Exhibit

Prepared For: Herbert Warnell

Bryan County, Georgia

APPENDIX D:	
Permit Drawings	



SHEET NAME

LOCATION MAP

CLIENT:

NORTHPOINTE DEVELOPMENT

LOCATION: BRYAN COUNTY, GA

DATE: 4/8/2021 JOB NUMBER: J-28774.0000 DRAWN BY: DSG

REVIEWED BY: CTW

SHEET: 1 SCALE: 1" = 3000'



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300

LEGEND

PROJECT SITE

TOTAL PROJECT ACREAGE

763.84 AC

TOTAL UPLAND / NON JURISDICTIOAL AREA

555.39 AC.

TOTAL JURISDICTIONAL WETLAND AREA

208.45 AC.

IMPACT SUMMARY

TOTAL IMPACT ACREAGE

33.06 AC

HH

TOTAL JURISDICTIONAL WETLAND AREA

33.06 AC.

SOUTH WARNELL TRACT

SHEET NAME:

LEGEND

CLIENT:

NORTHPOINTE DEVELOPMENT

LOCATION: BRYAN COUNTY, GA DATE: 4/8/2021 C

JOB NUMBER: J-28774.0000

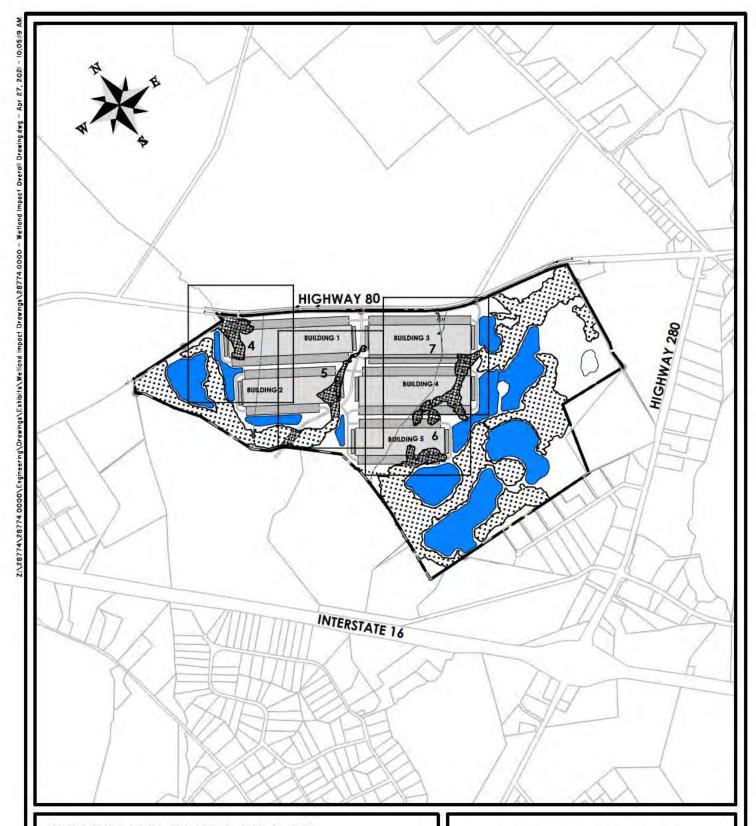
DRAWN BY: DSG

REVIEWED BY: CTW

SHEET: 2 SCALE: N.T.S.



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300



SHEET NAME:

SHEET INDEX

CLIENT:

NORTHPOINTE DEVELOPMENT

LOCATION: BRYAN COUNTY, GA

DATE: 4/8/2021 JOB NUMBER: J-2774.0000 DRAWN BY: DSG

REVIEWED BY: CTW

SHEET: 3 SCALE: 1" = 2000'



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300

SHEET NAME:

WETLAND IMPACT DRAWING

CLIENT:

NORTHPOINTE DEVELOPMENT

LOCATION: BRYAN COUNTY, GA

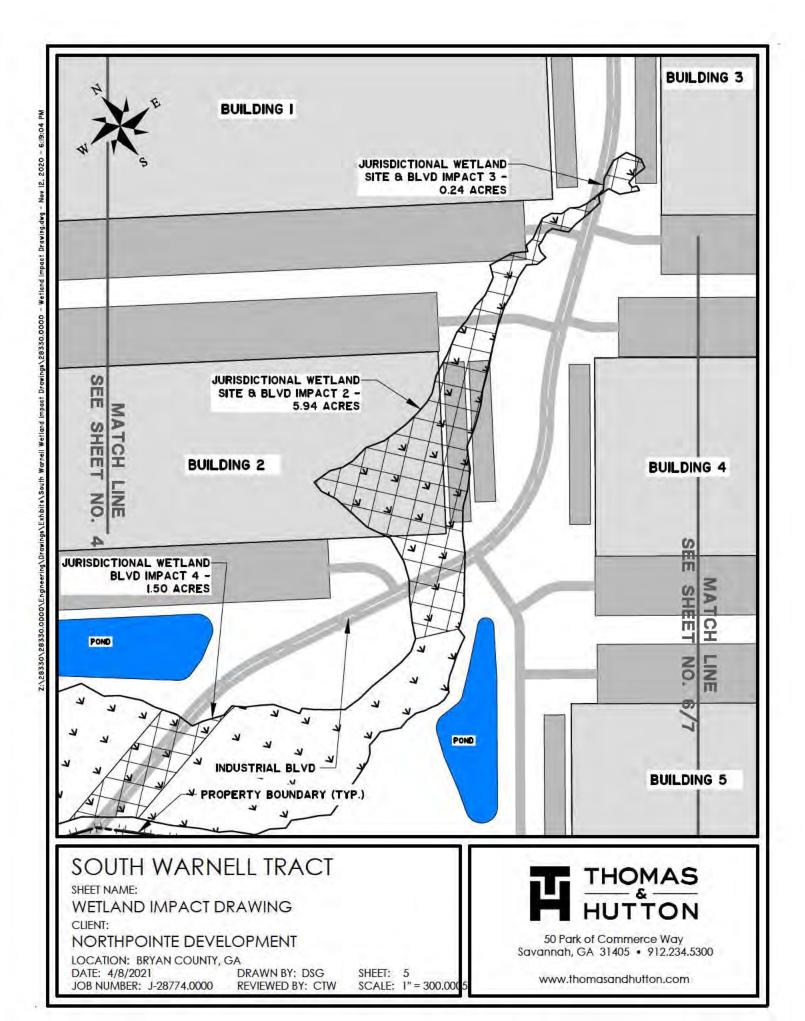
DATE: 4/8/2021 JOB NUMBER: J-28774.0000 DRAWN BY: DSG

REVIEWED BY: CTW

SHEET: 4 SCALE: 1" = 300.000



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300



SHEET NAME:

WETLAND IMPACT DRAWING

CLIENT:

NORTHPOINTE DEVELOPMENT

LOCATION: BRYAN COUNTY, GA

DATE: 4/8/2021 JOB NUMBER: J-28774.0000 DRAWN BY: DSG

REVIEWED BY: CTW

SHEET: 6 SCALE: 1" = 300'



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300

SHEET NAME:

WETLAND IMPACT DRAWING

CLIENT:

NORTHPOINTE DEVELOPMENT

LOCATION: BRYAN COUNTY, GA DATE: 4/8/2021

JOB NUMBER: J-28774.0000

DRAWN BY: DSG

REVIEWED BY: CTW

SHEET: 7 SCALE: 1" = 300.000



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300

SHEET NAME:

TYPICAL SECTIONS

CLIENT:

Z/28330/28330.0000\Engineering\Drawings\Enkibits\South Warnell Wetland Impact Drawings\28330.0000 - Wetland Impact Cover and Details.dwg - Nov IZ, 2020 - 64|2:38 PM

NORTHPOINTE DEVELOPMENT

LOCATION: BRYAN COUNTY, GA DATE: 4/8/2021

JOB NUMBER: J-28774.0000

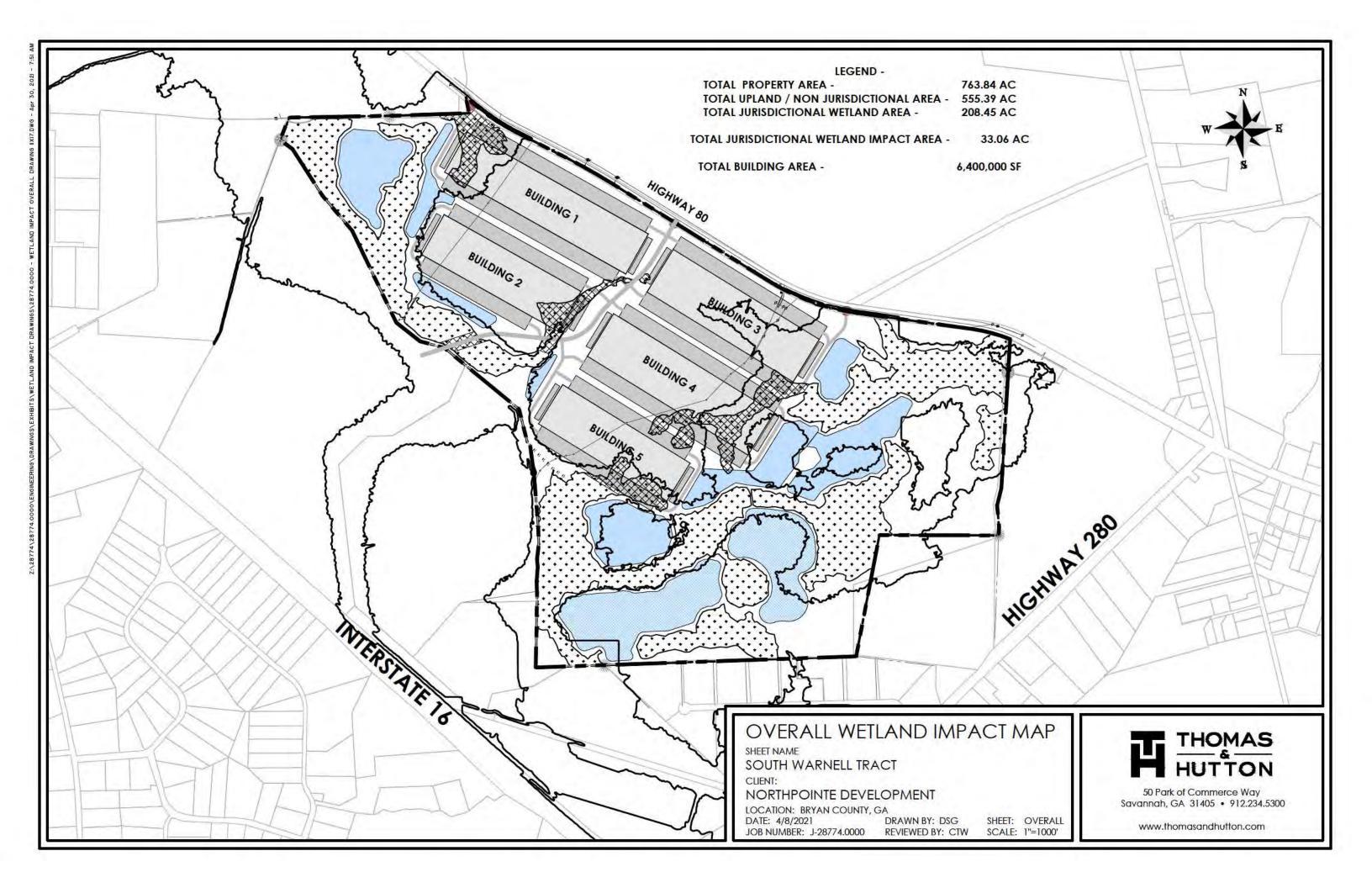
DRAWN BY: DSG

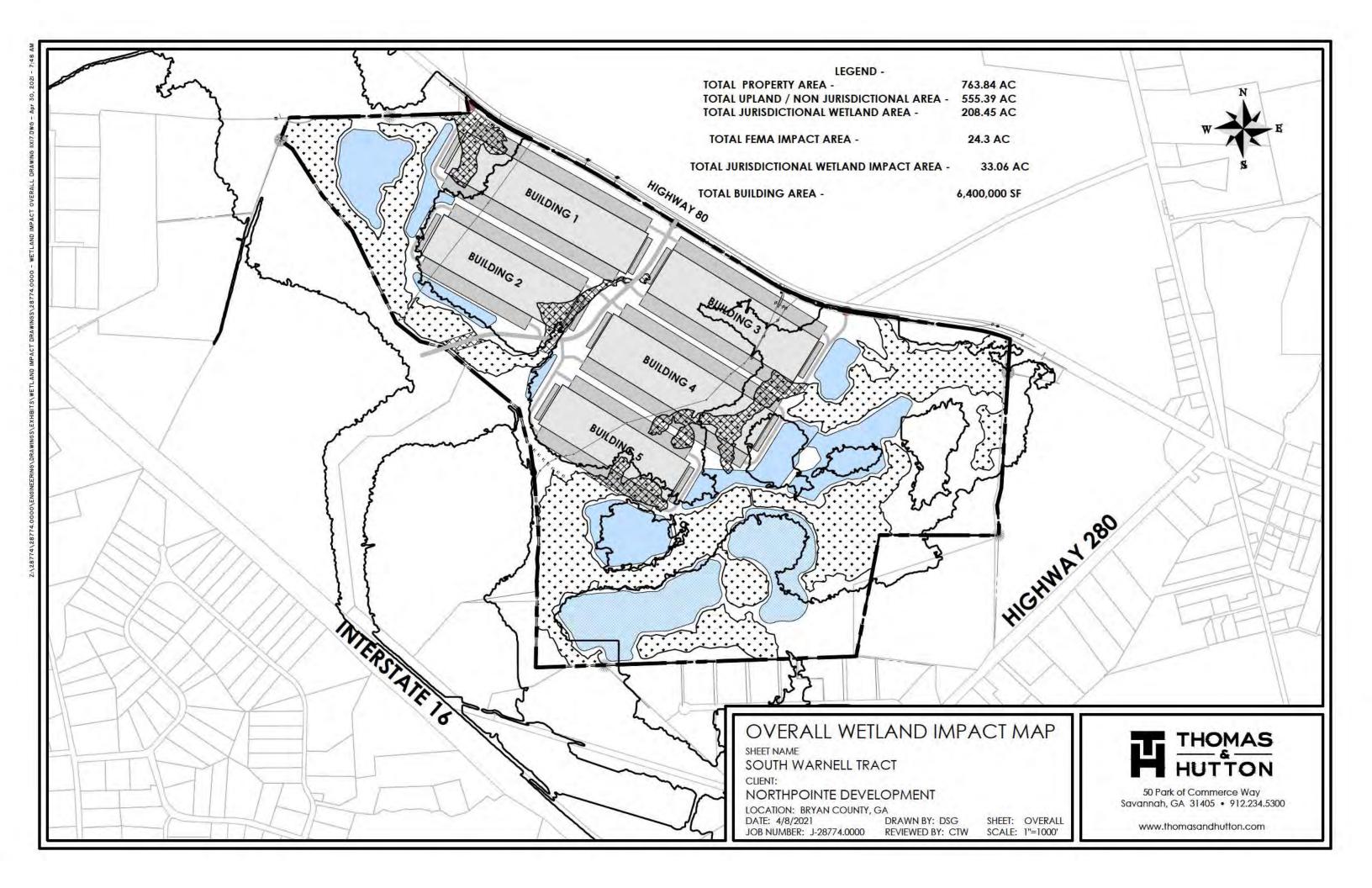
REVIEWED BY: CTW

SHEET: 8 W SCALE: N.T.S.

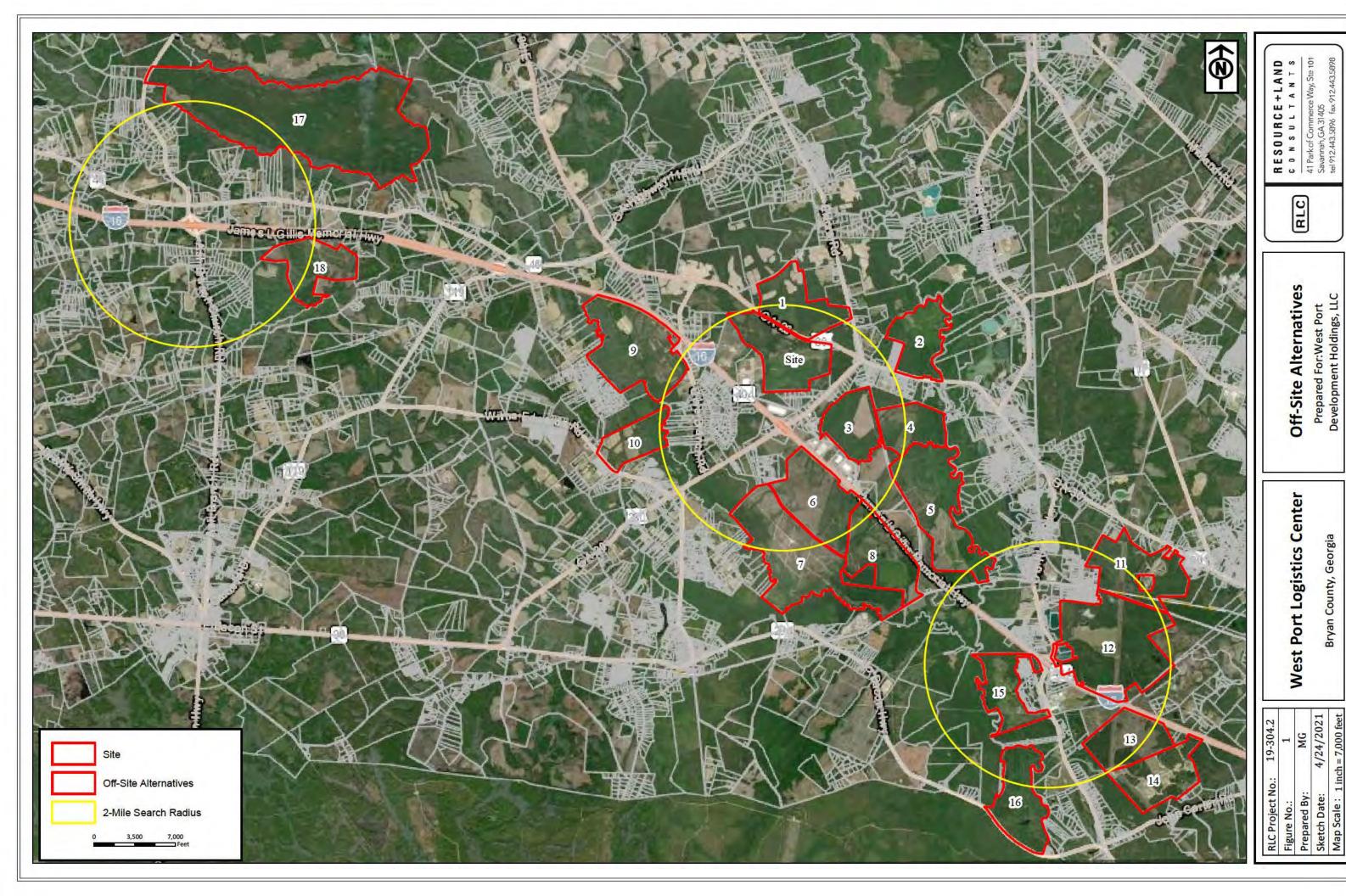


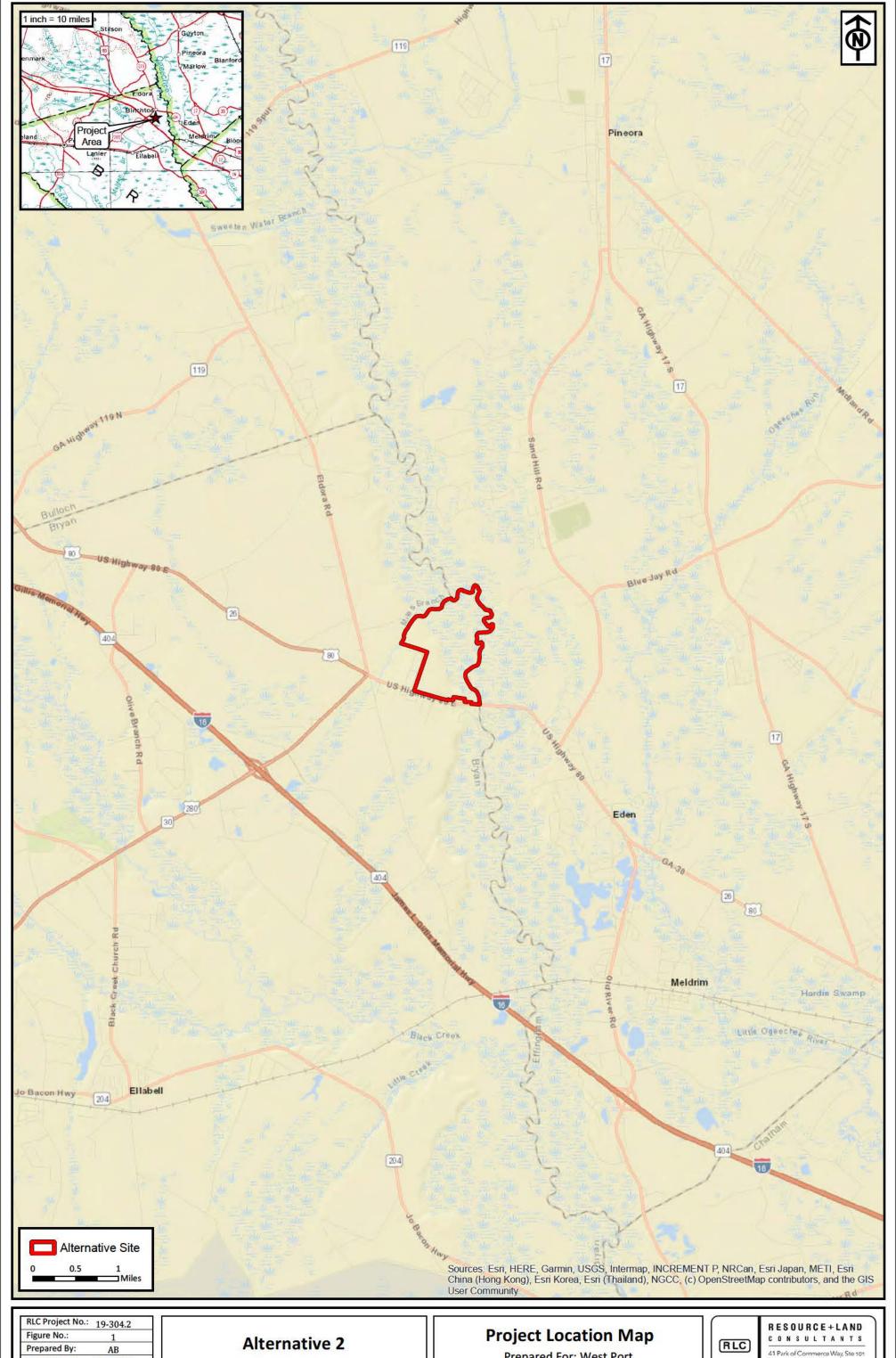
50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300





APPENDIX E:
Off-Site Alternatives Information

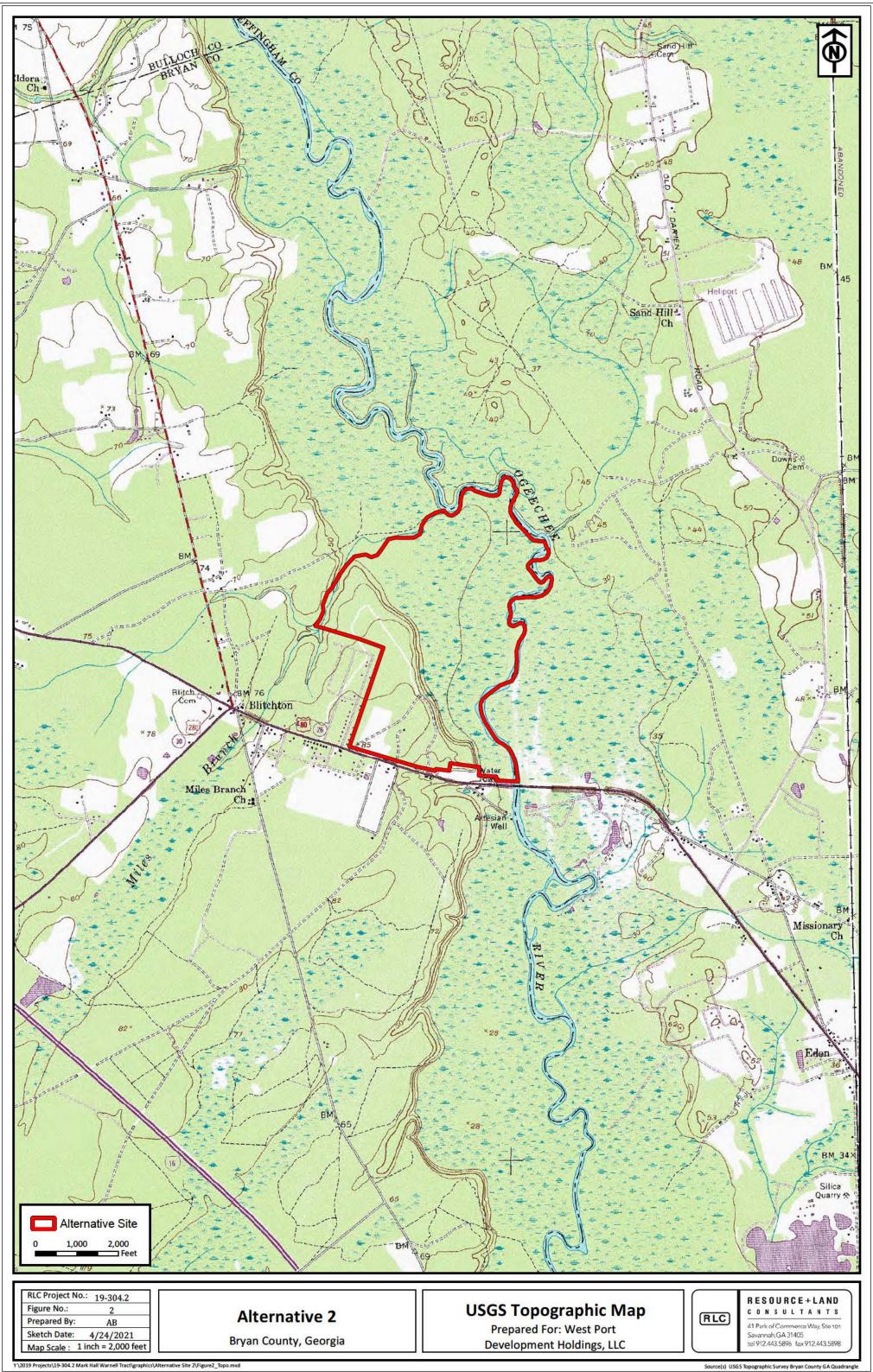


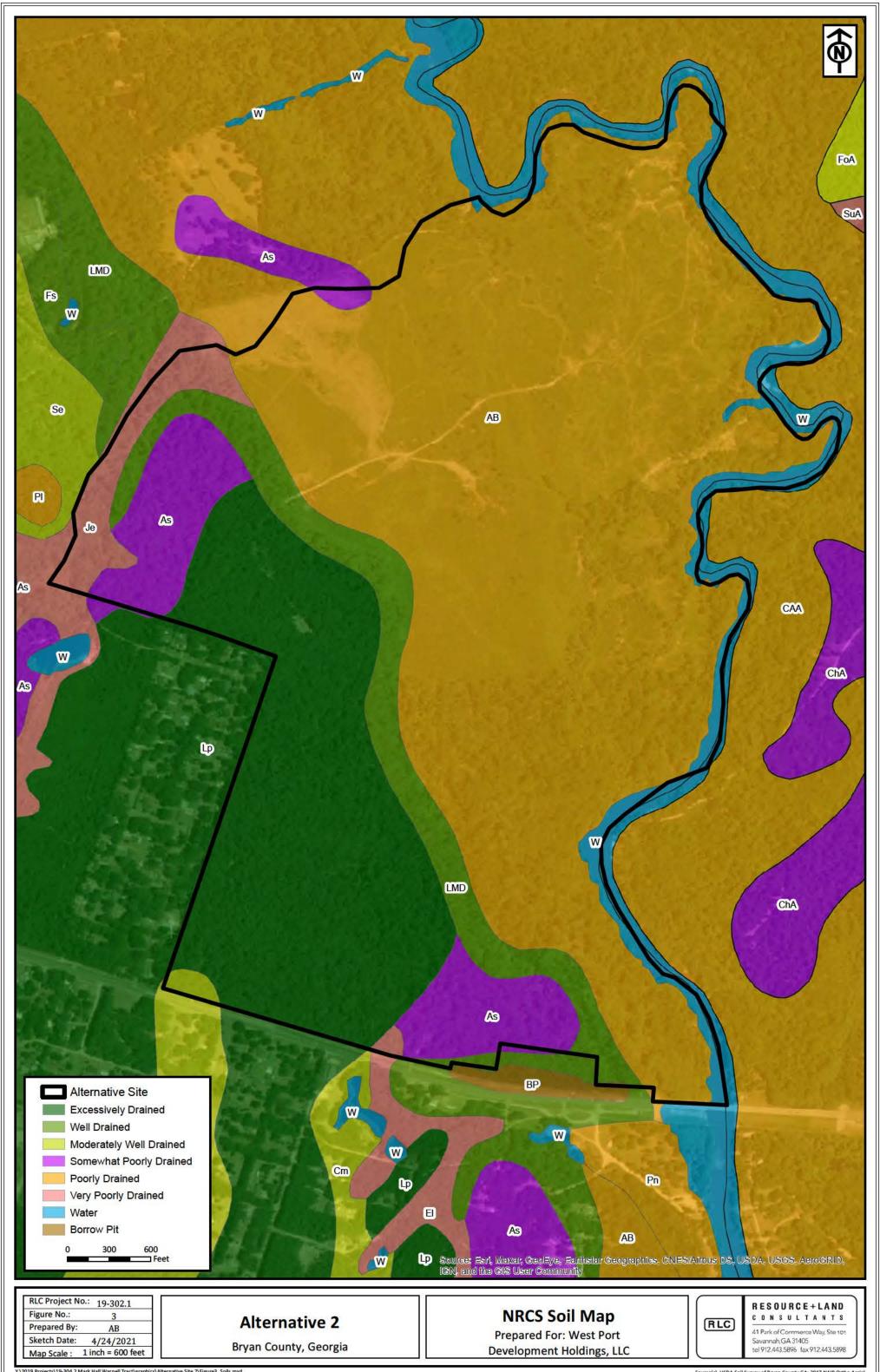


Sketch Date: 4/24/2021 Map Scale: 1 inch = 5,280 feet

Bryan County, Georgia

Prepared For: West Port **Development Holdings, LLC**









RLC Project No.: 19-304.2

Figure No.: 5

Prepared By: AB

Sketch Date: 4/24/2021

Map Scale: 1 inch = 600 feet

Alternative 2

Bryan County, Georgia

2017 Ortho Aerial

Prepared For: West Port Development Holdings, LLC RLC

RESOURCE+LAND
CONSULTANTS

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



RLC Project No.: 19-304.2

Figure No.: 6

Prepared By: AB

Sketch Date: 4/24/2021

Map Scale: 1 inch = 600 feet

Alternative 2

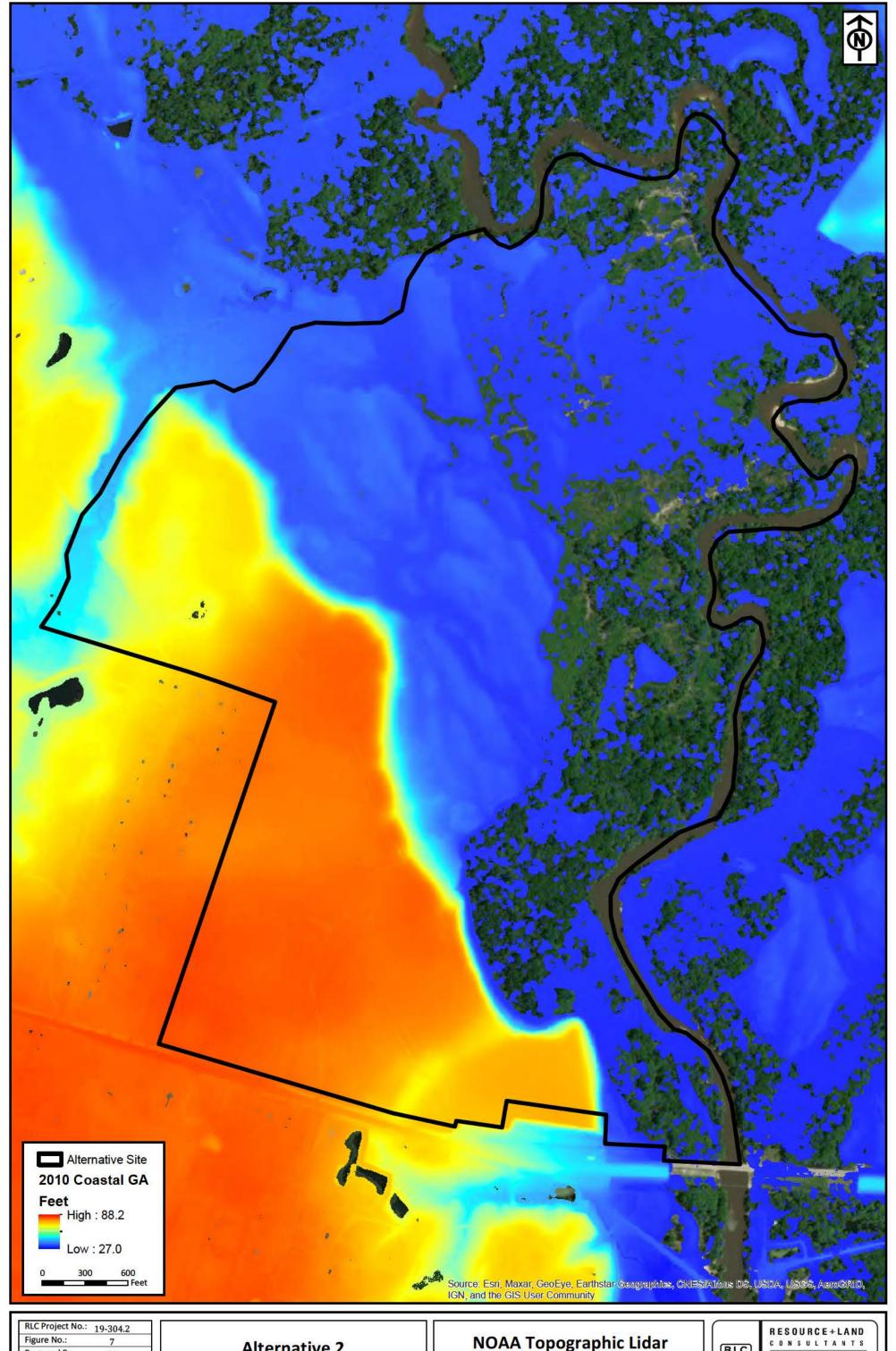
Bryan County, Georgia

1999 Color-Infrared Imagery

Prepared For: West Port Development Holdings, LLC RESOURCE+LAND

CONSULTANTS

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



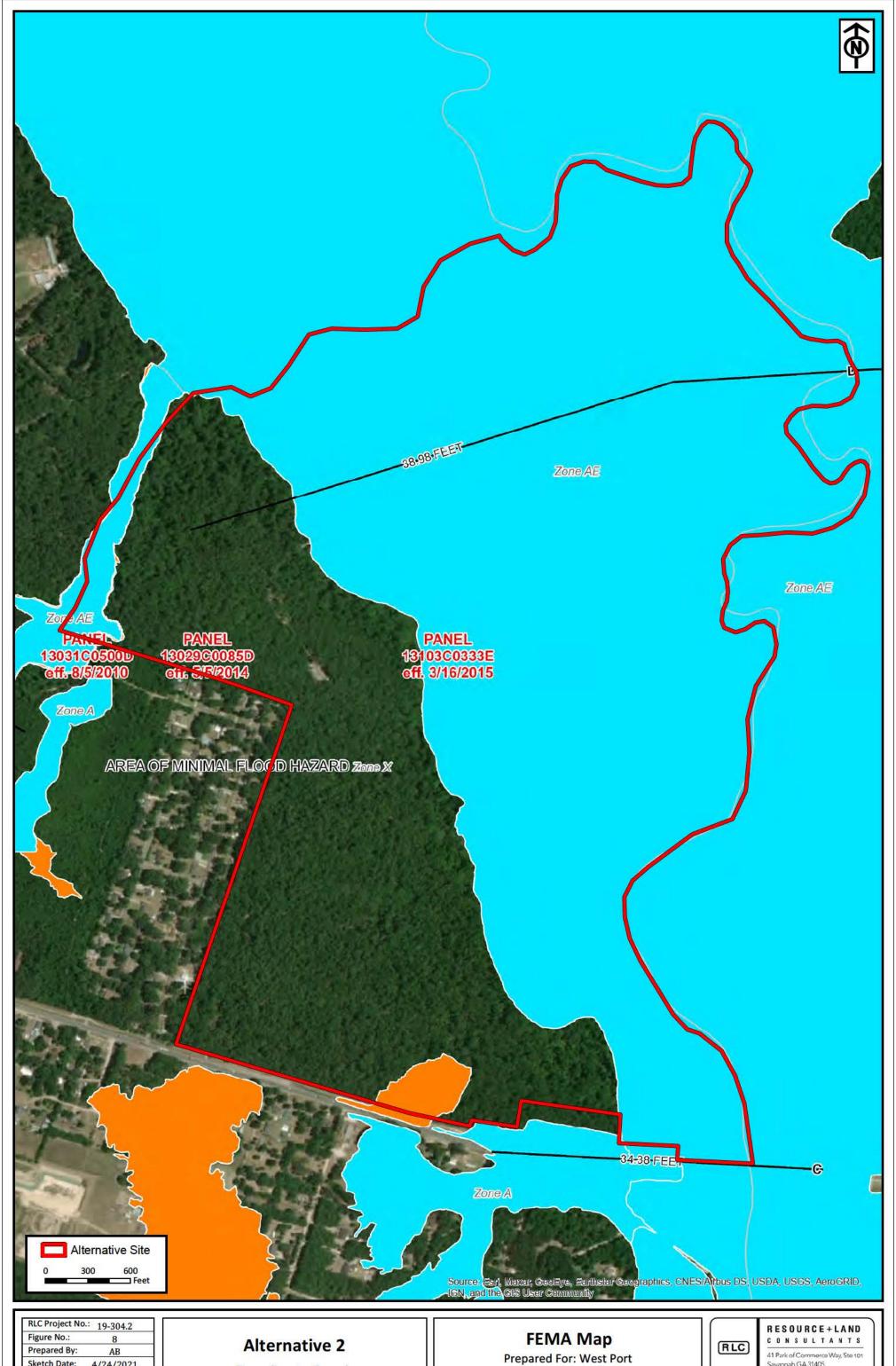
Prepared By: AB Sketch Date: 4/24/2021 Map Scale: 1 inch = 600 feet

Alternative 2 Bryan County, Georgia

NOAA Topographic Lidar Prepared For: West Port

Development Holdings, LLC

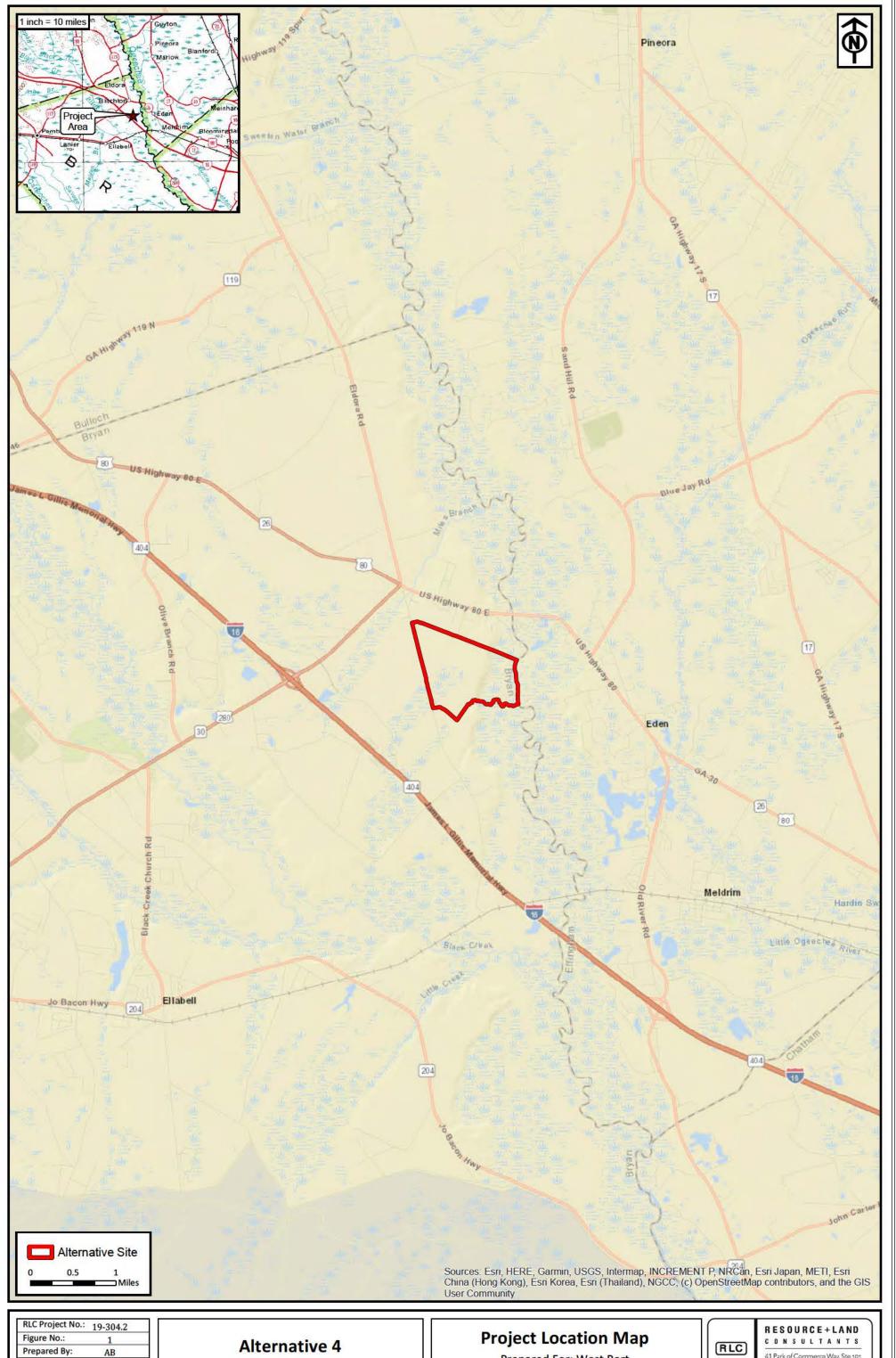
RLC



Sketch Date: 4/24/2021 Map Scale: 1 inch = 600 feet

Bryan County, Georgia

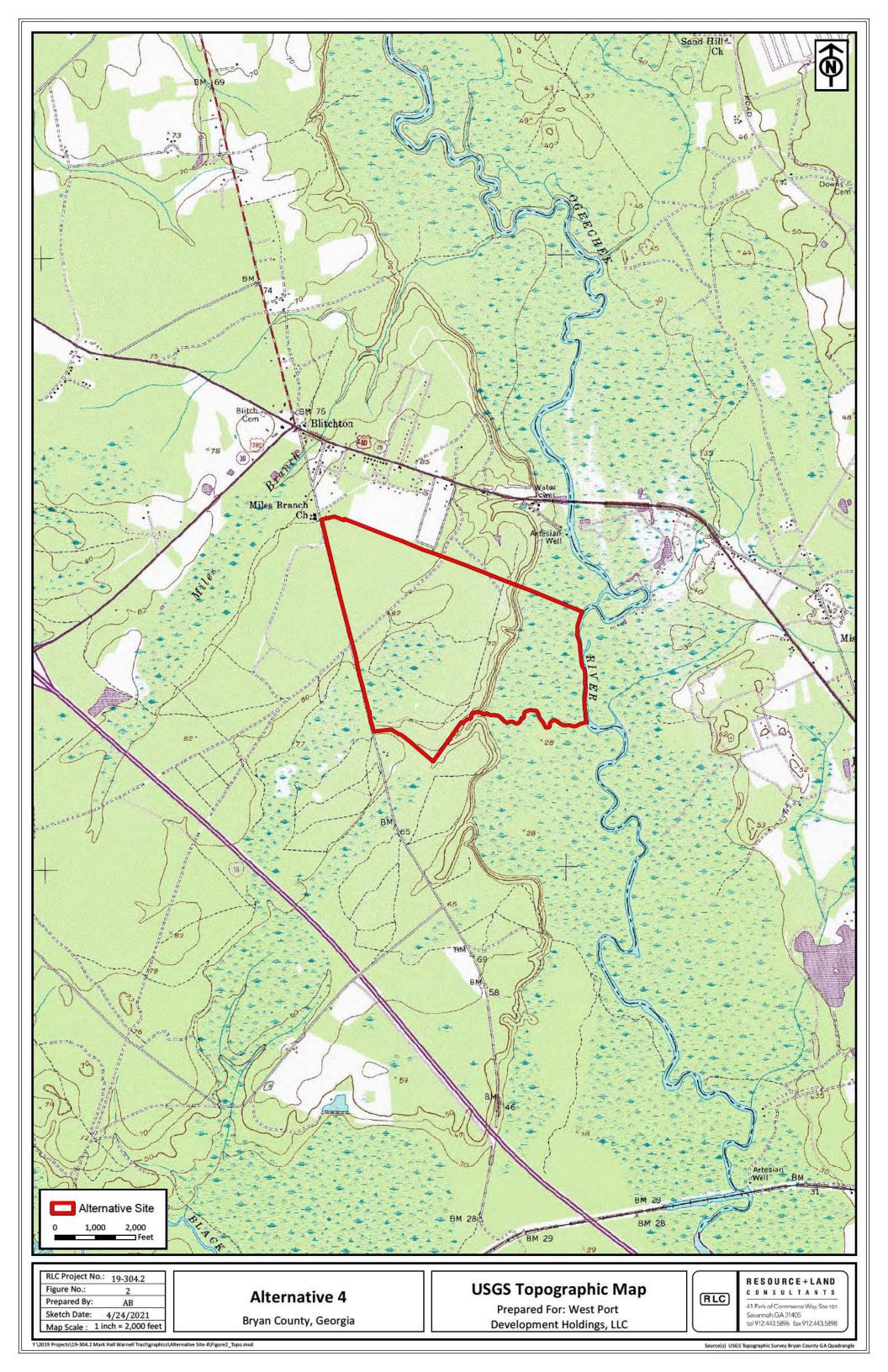
Development Holdings, LLC

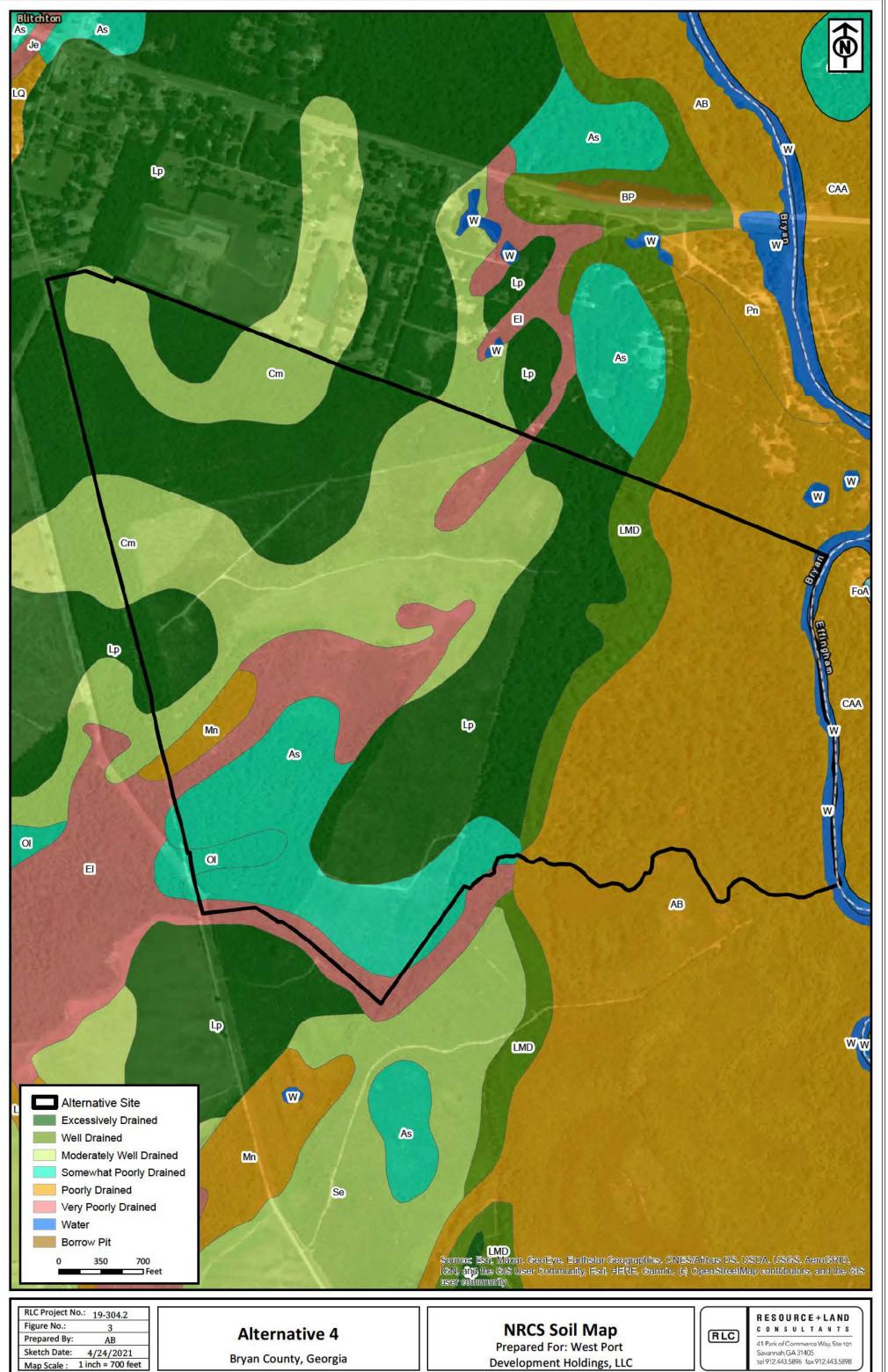


Sketch Date: 4/24/2021 Map Scale: 1 inch = 5,280 feet

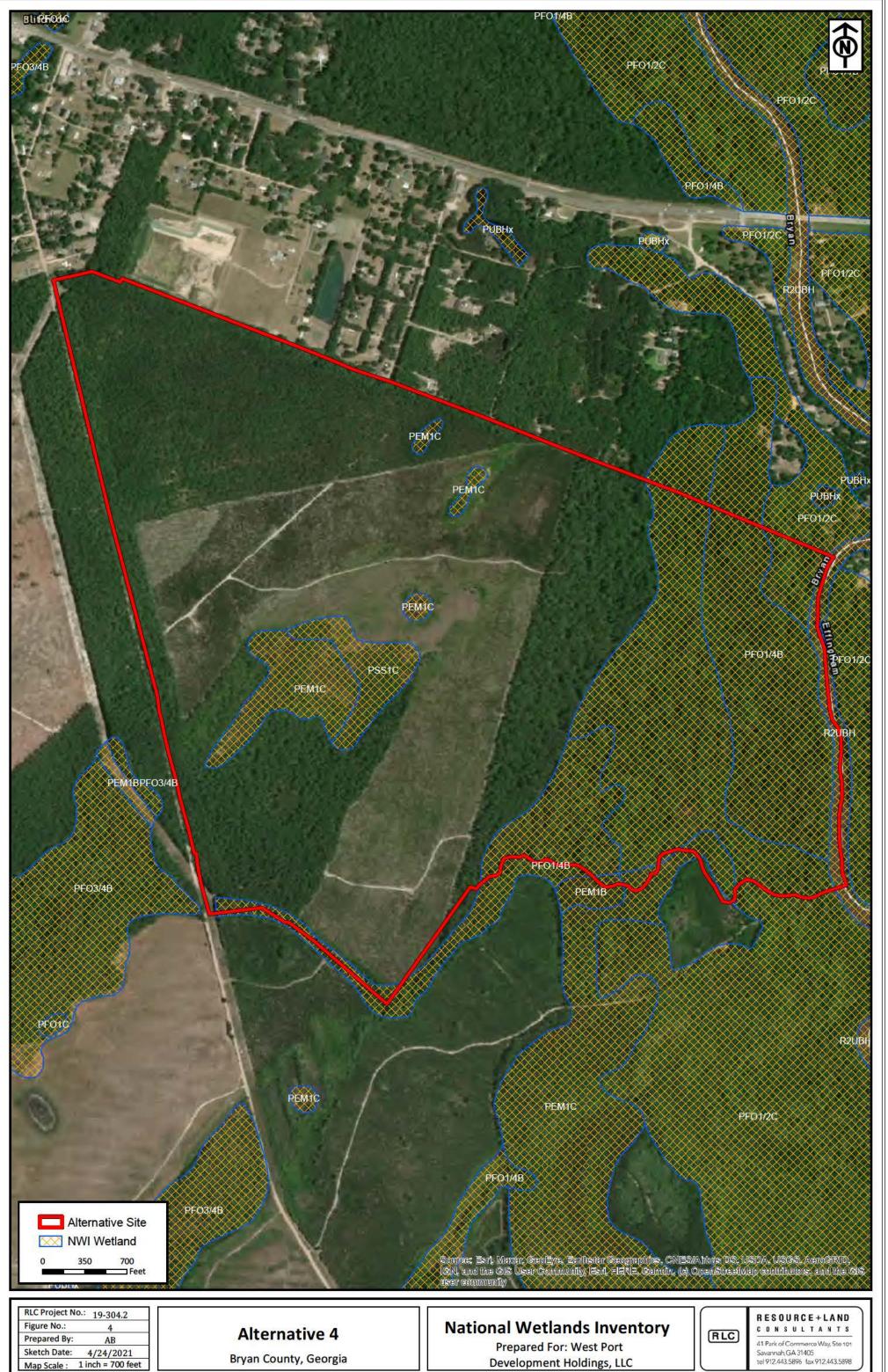
Bryan County, Georgia

Prepared For: West Port **Development Holdings, LLC**





Development Holdings, LLC



Development Holdings, LLC

Source(s) USFWS NWI, Georgia; 2017 NAIP Ae



RLC Project No.: 19-304.2

Figure No.: 5

Prepared By: AB

Sketch Date: 4/24/2021

Map Scale: 1 inch = 700 feet

Alternative 4

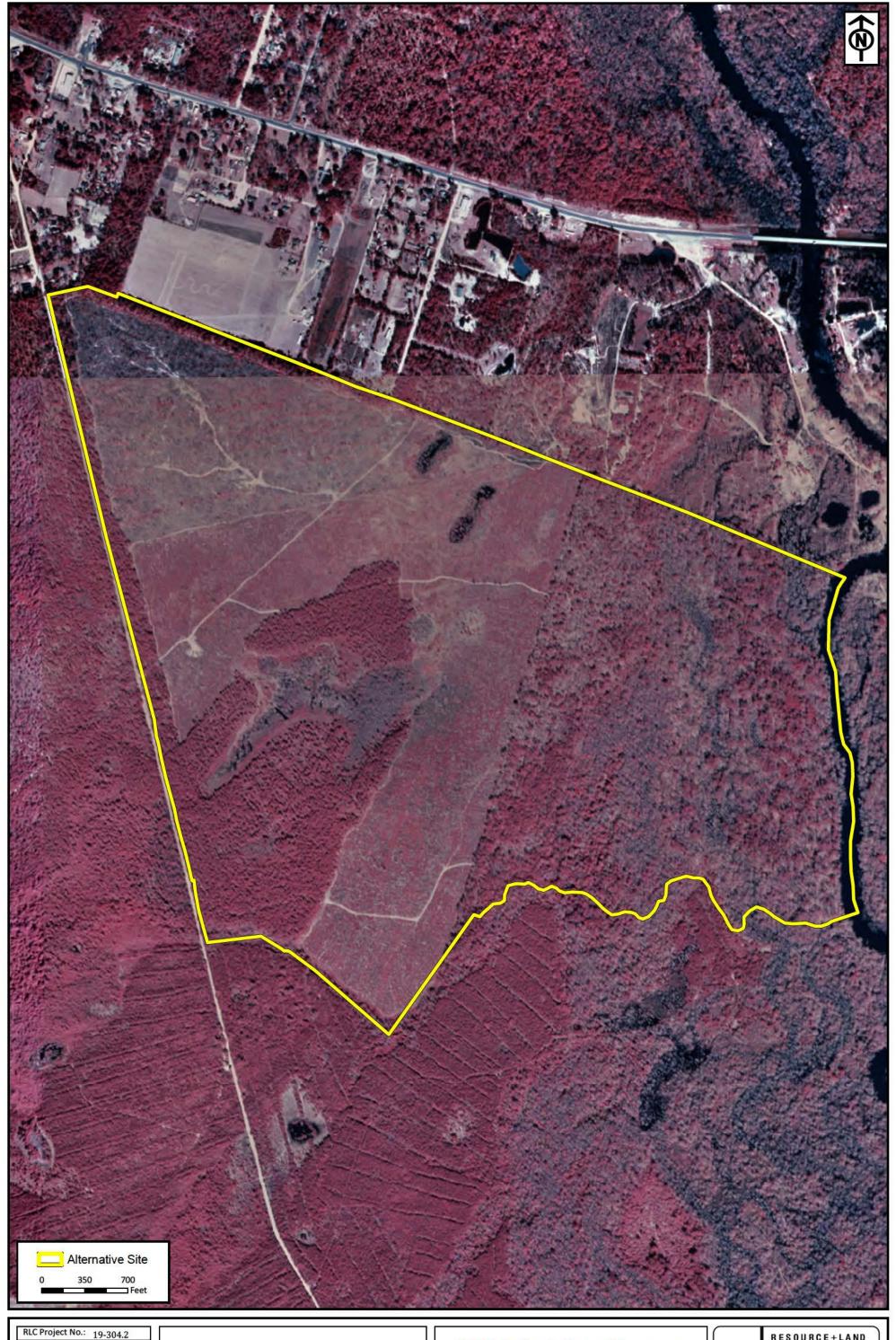
Bryan County, Georgia

2017 Ortho Aerial

Prepared For: West Port Development Holdings, LLC RLC

RESOURCE+LAND
C 0 N S U L T A N T S

41 Park of Commerce Way, Ste 101



RLC Project No.: 19-304.2

Figure No.: 6

Prepared By: AB

Sketch Date: 4/24/2021

Map Scale: 1 inch = 700 feet

Alternative 4

Bryan County, Georgia

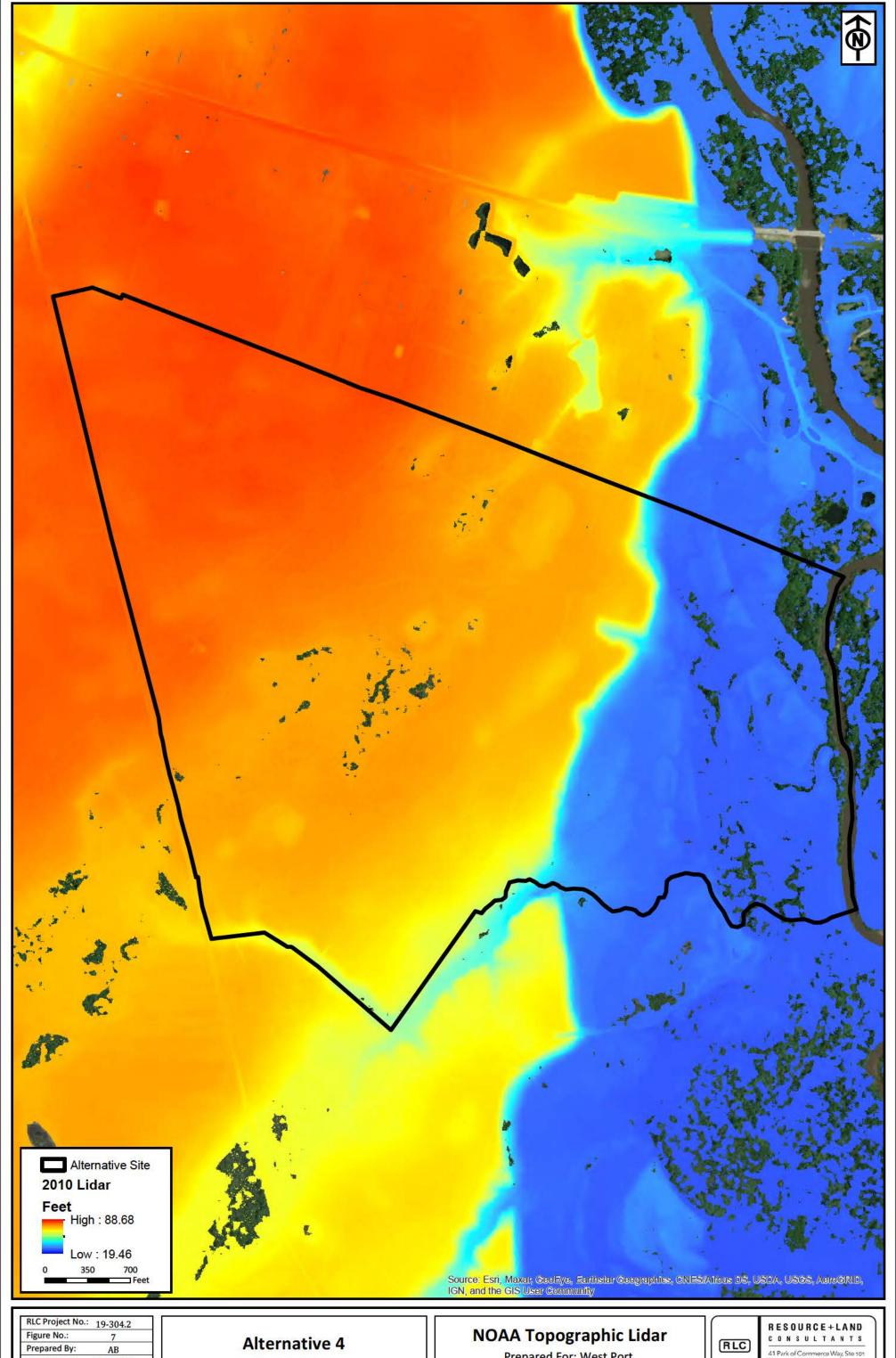
1999 Color-Infrared Imagery
Prepared For:West Port

Prepared For:West Port
Development Holdings, LLC

RLC

RESOURCE+LAND
C 0 N S U L T A N T S

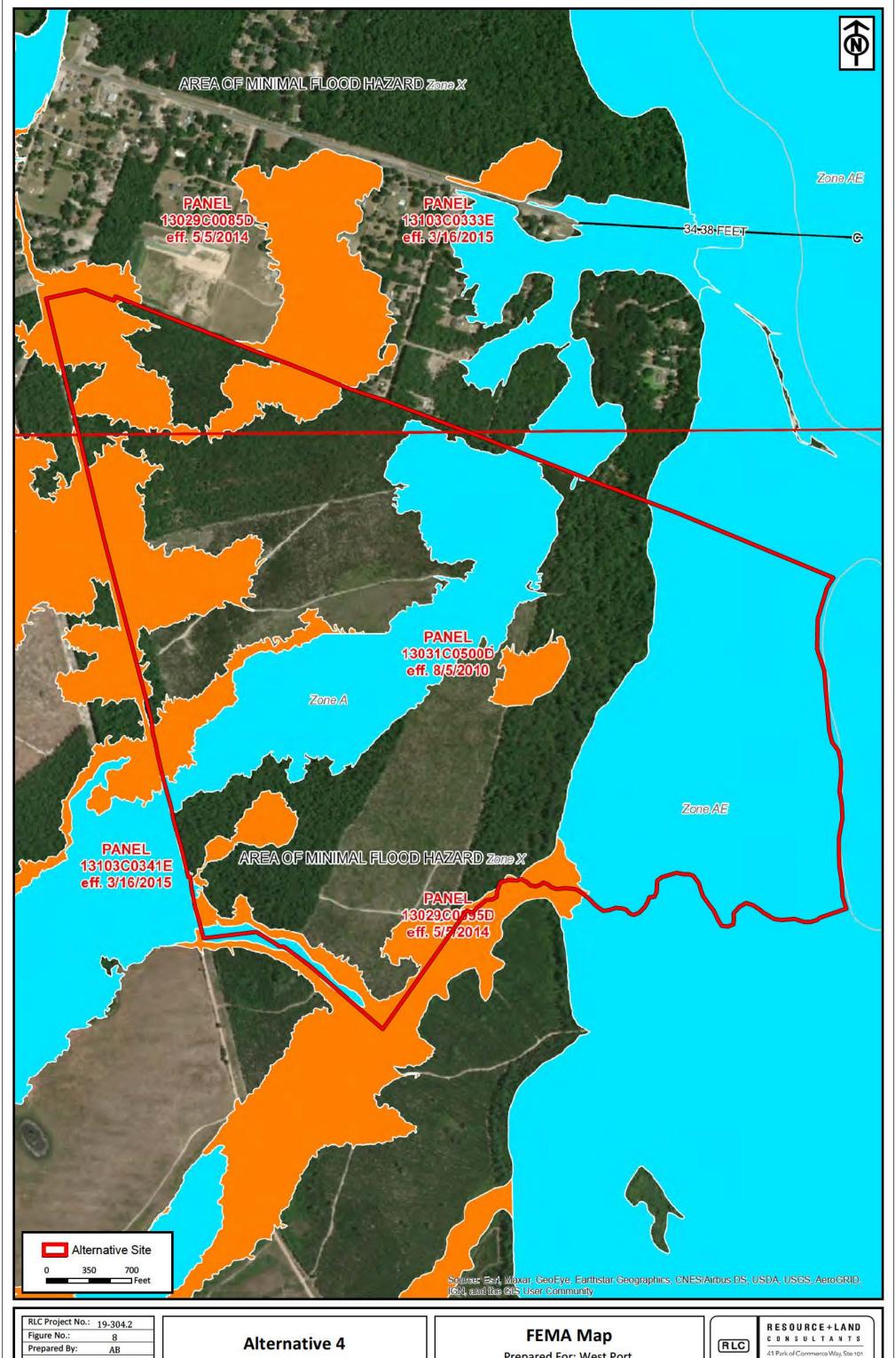
41 Park of Commerce Way, Ste 101
Savannah, GA 31405
tel 912.443.5896 fax 912.443.5898



Sketch Date: 4/24/2021 Map Scale: 1 inch = 700 feet

Bryan County, Georgia

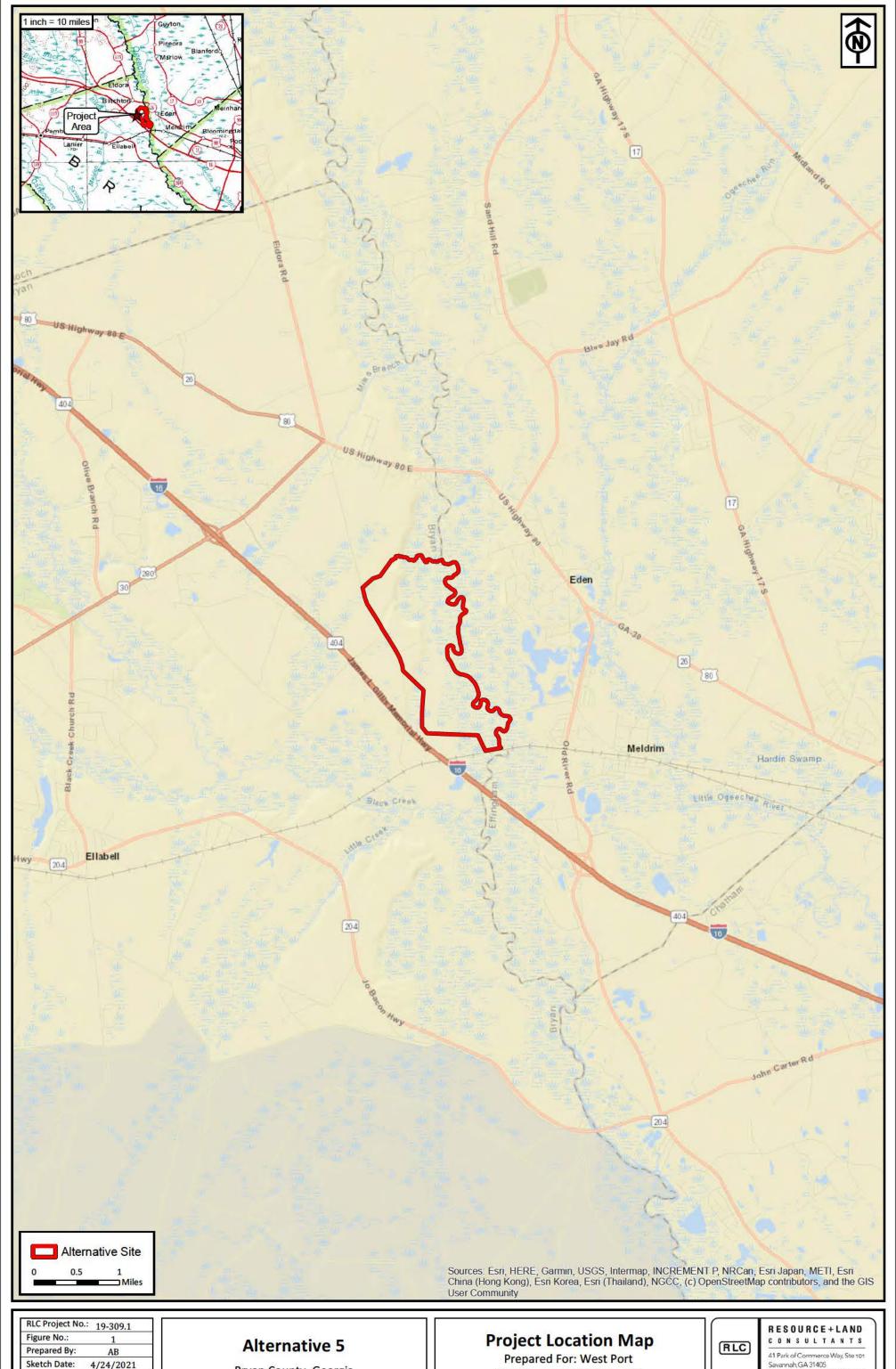
Prepared For: West Port Development Holdings, LLC



Sketch Date: 4/24/2021 Map Scale: 1 inch = 700 feet

Bryan County, Georgia

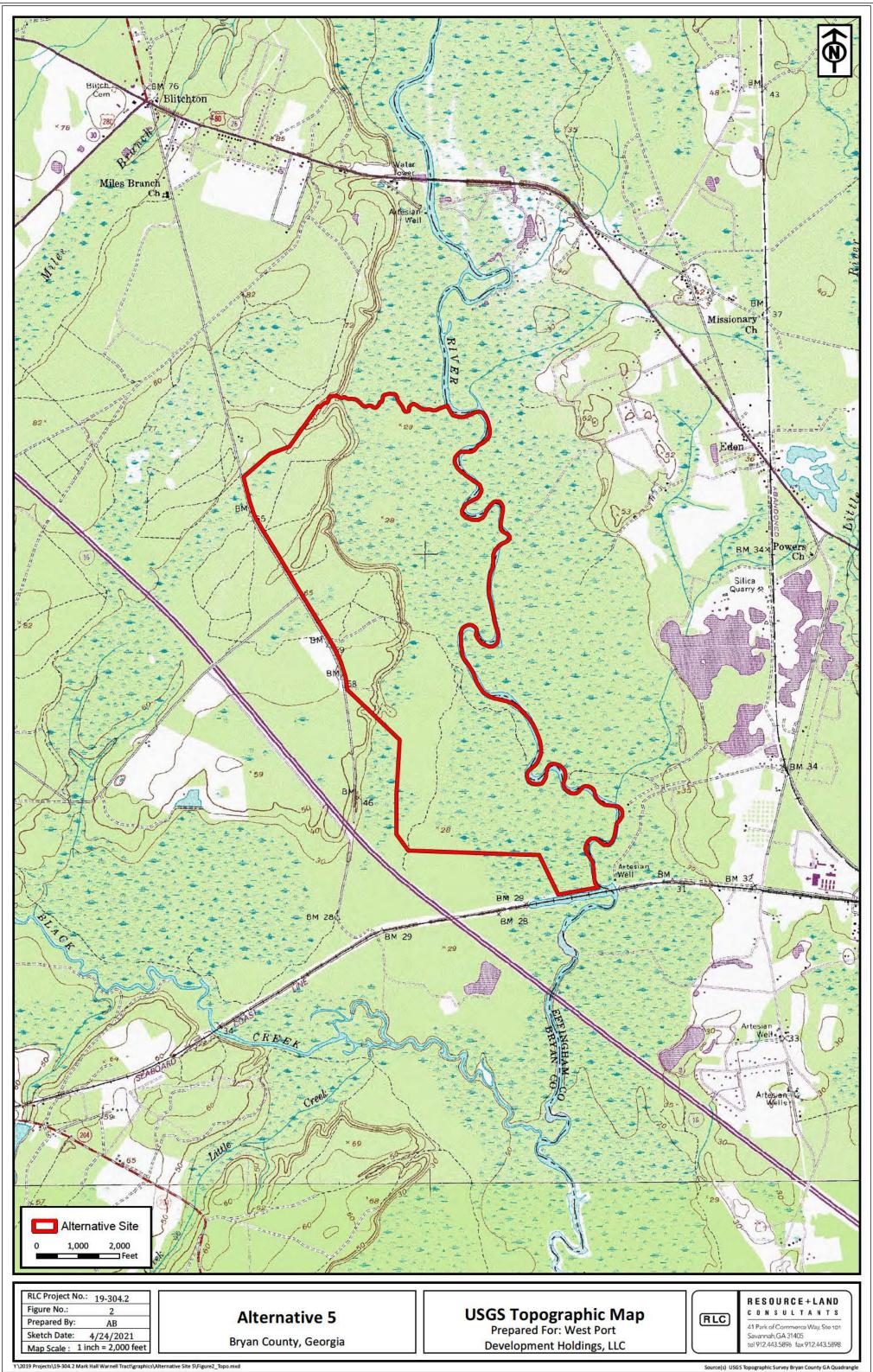
Prepared For: West Port Development Holdings, LLC

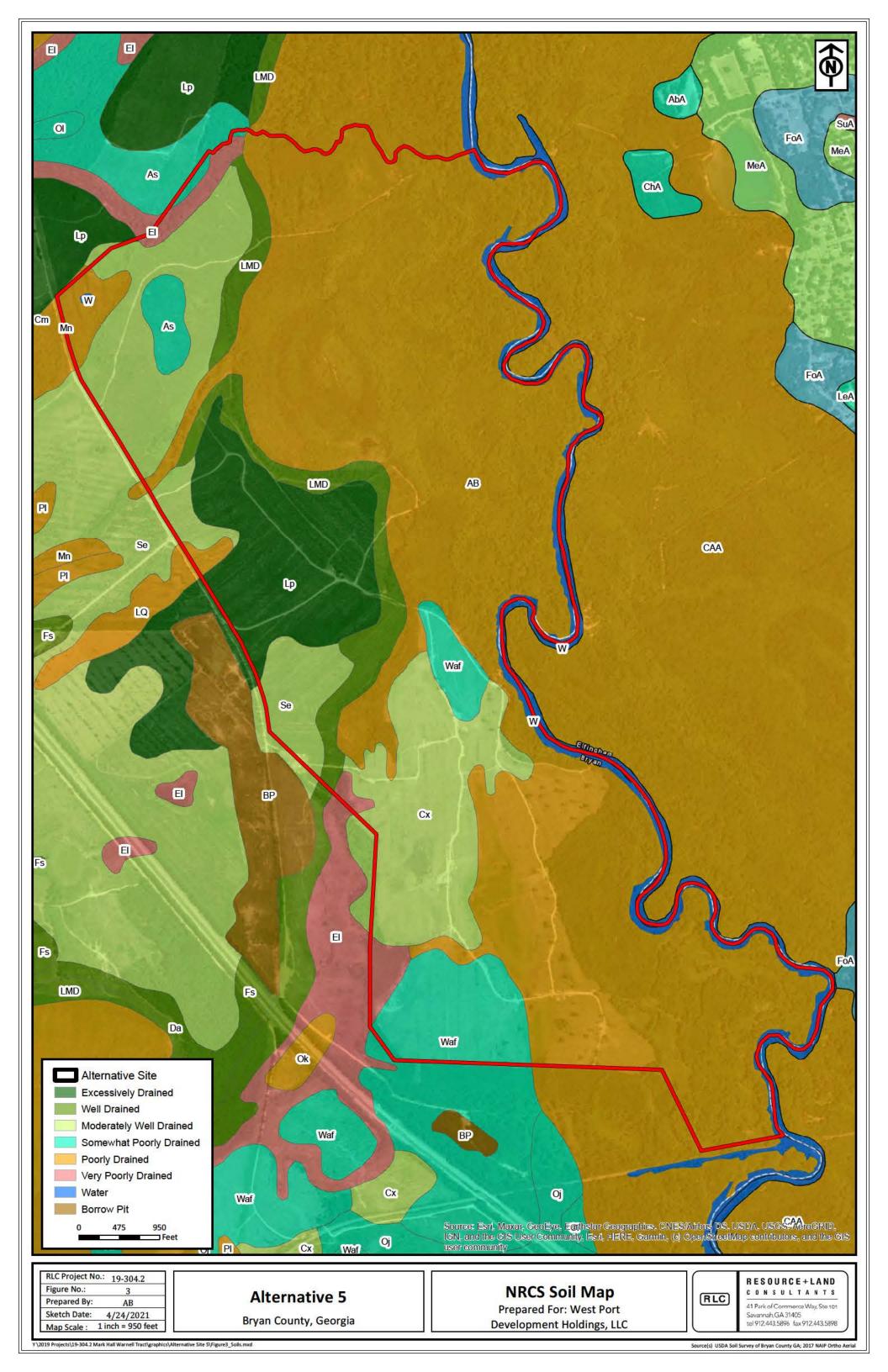


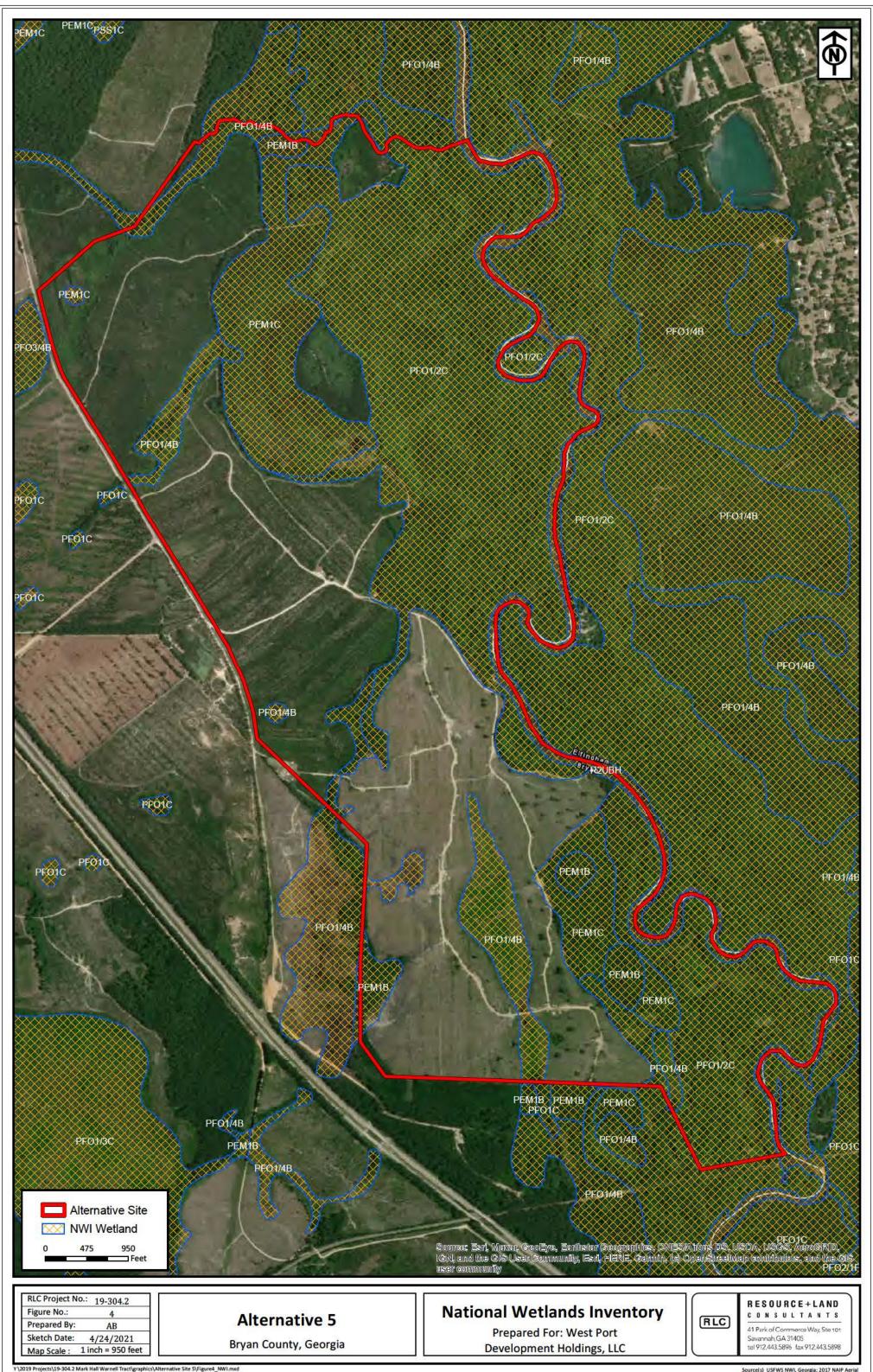
Sketch Date: 4/24/2021 Map Scale: 1 inch = 5,280 feet

Bryan County, Georgia

Development Holdings, LLC







Source(s) USFWS NWI, Georgia; 2017 NAIP Ae



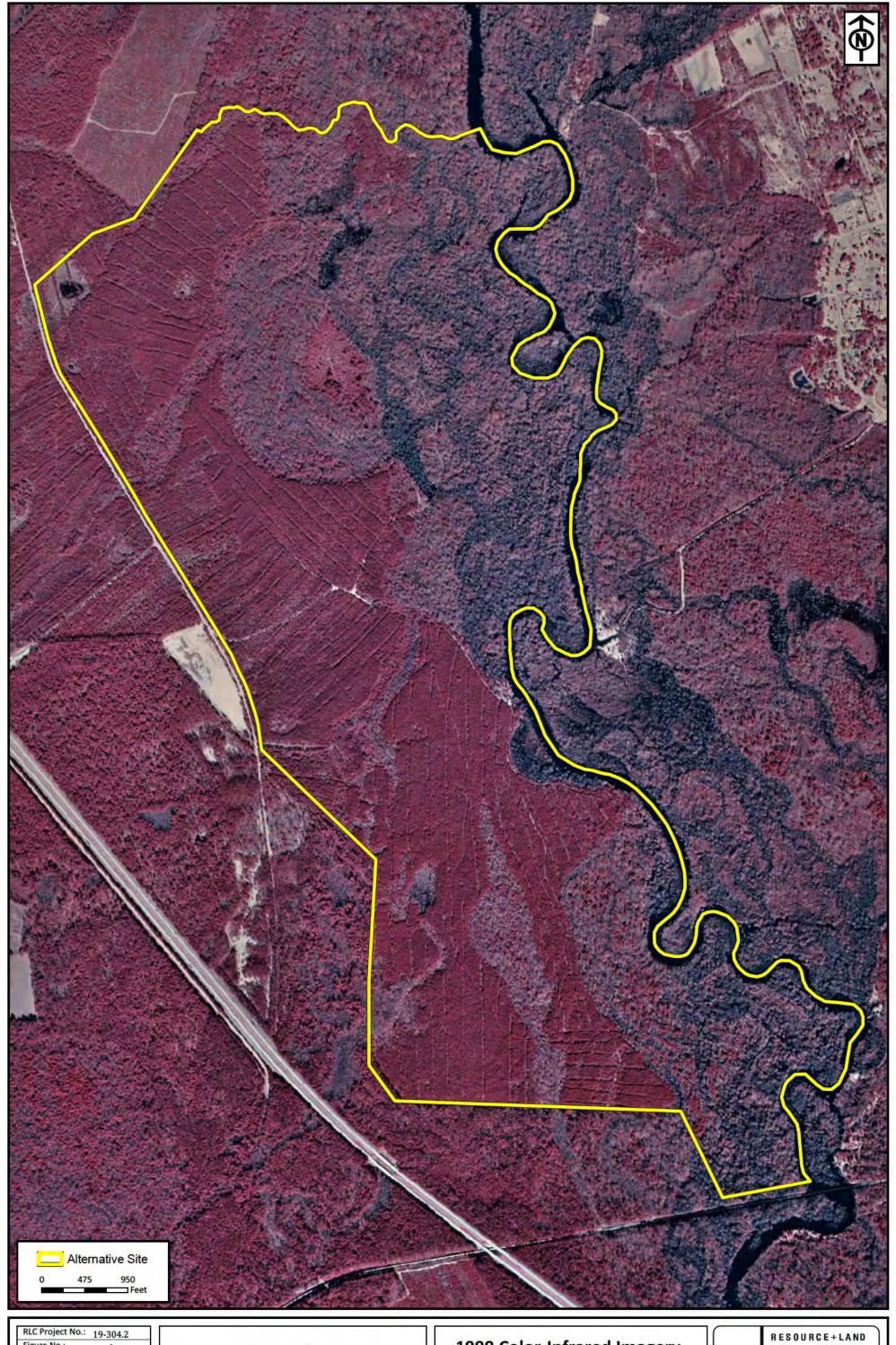
Prepared By: AB Sketch Date: 4/24/2021 Map Scale: 1 inch = 950 feet

Alternative 5

Bryan County, Georgia

Prepared For: West Port Development Holdings, LLC RLC

CONSULTANTS



RLC Project No.: 19-304.2

Figure No.: 6

Prepared By: AB

Sketch Date: 4/24/2021

Map Scale: 1 inch = 950 feet

Alternative 5

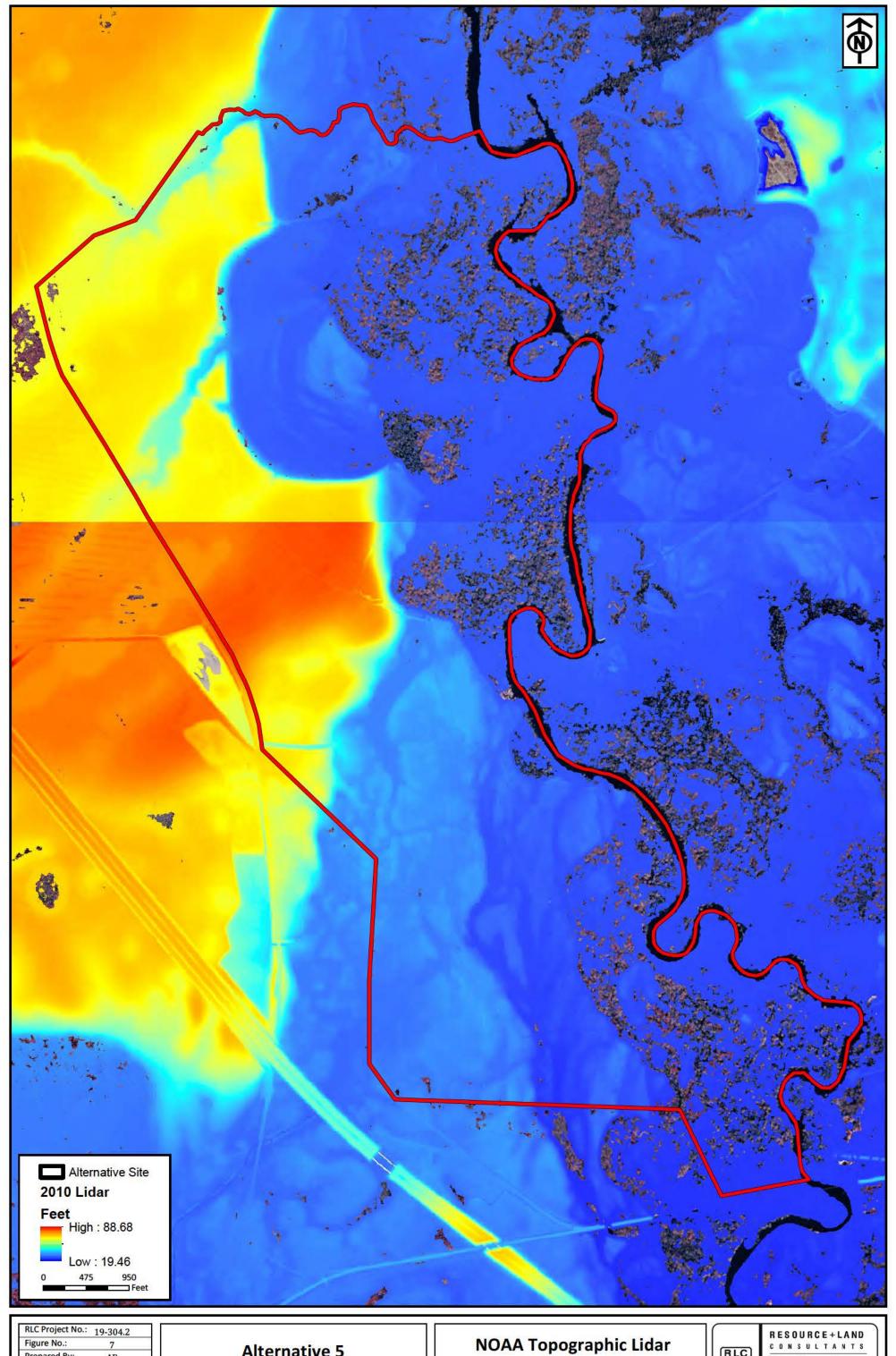
Bryan County, Georgia

1999 Color-Infrared Imagery

Prepared For: West Port Development Holdings, LLC RLC

RESOURCE+LAND
C 0 N S U L T A N T S

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



Prepared By: AB Sketch Date: 4/24/2021

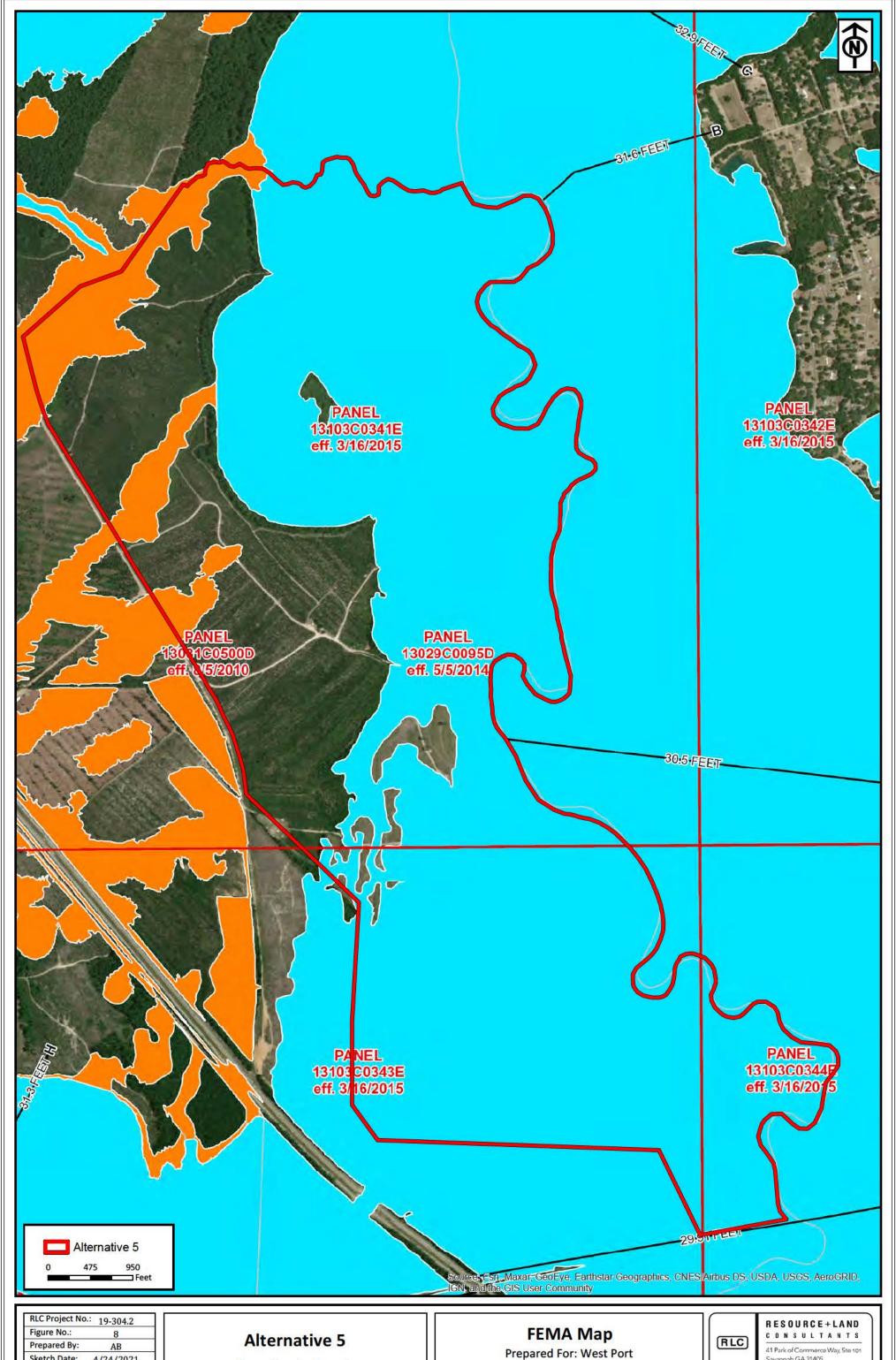
Map Scale: 1 inch = 950 feet

Alternative 5

Bryan County, Georgia

Prepared For: West Port Development Holdings, LLC RLC

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



Sketch Date: 4/24/2021 Map Scale: 1 inch = 950 feet

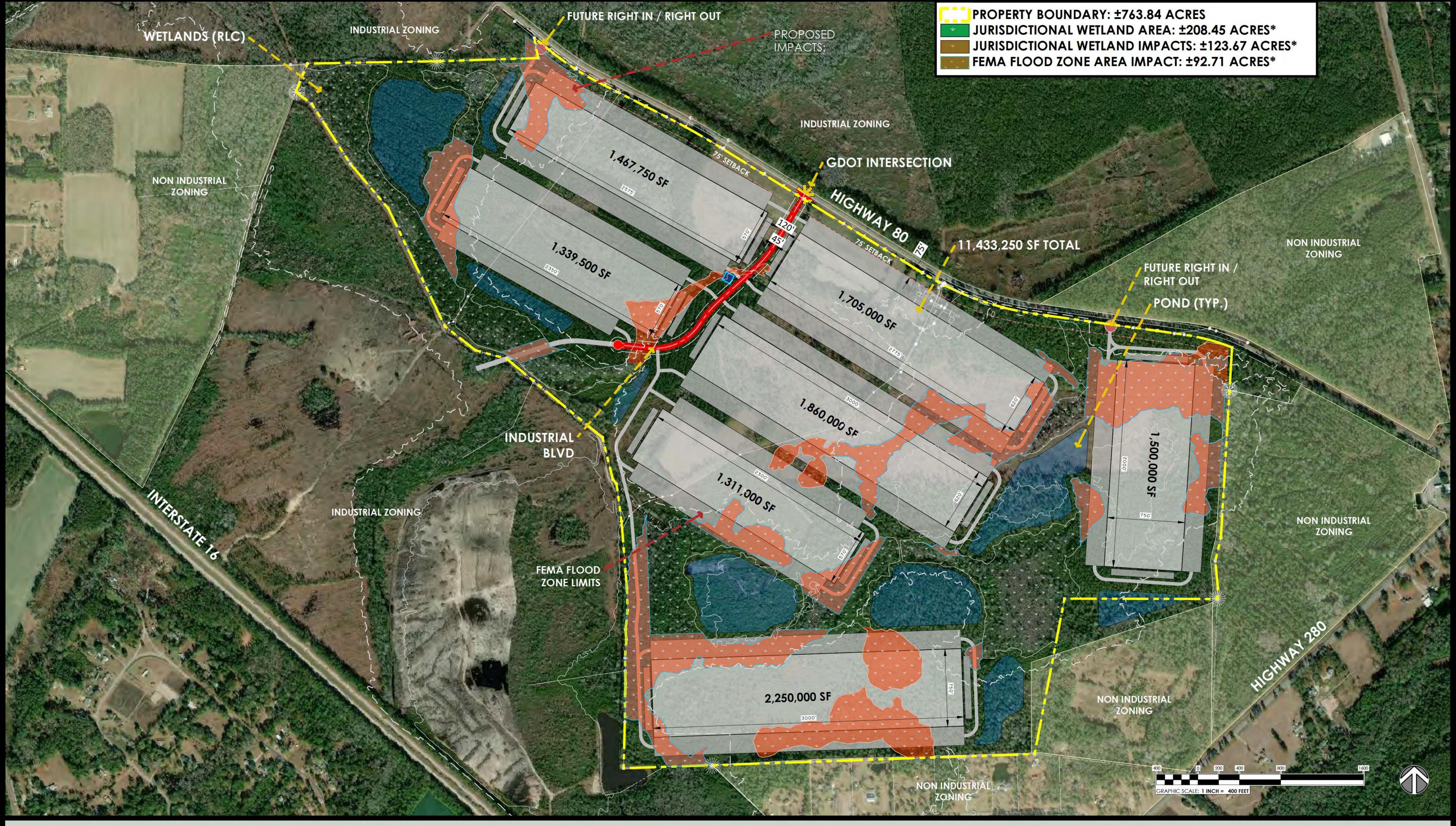
Development Holdings, LLC

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

Source(s) USFWS NWI, Georgia; 2017 NAIP Aerial

Bryan County, Georgia

APPENDIX F:
On-Site Configurations
0



PREPARED FOR:

CONCEPTUAL MASTERPLAN EXHIBIT - ALTERNATE 1

WARNELL TRACT

BRYAN COUNTY / GA

April 27, 2021

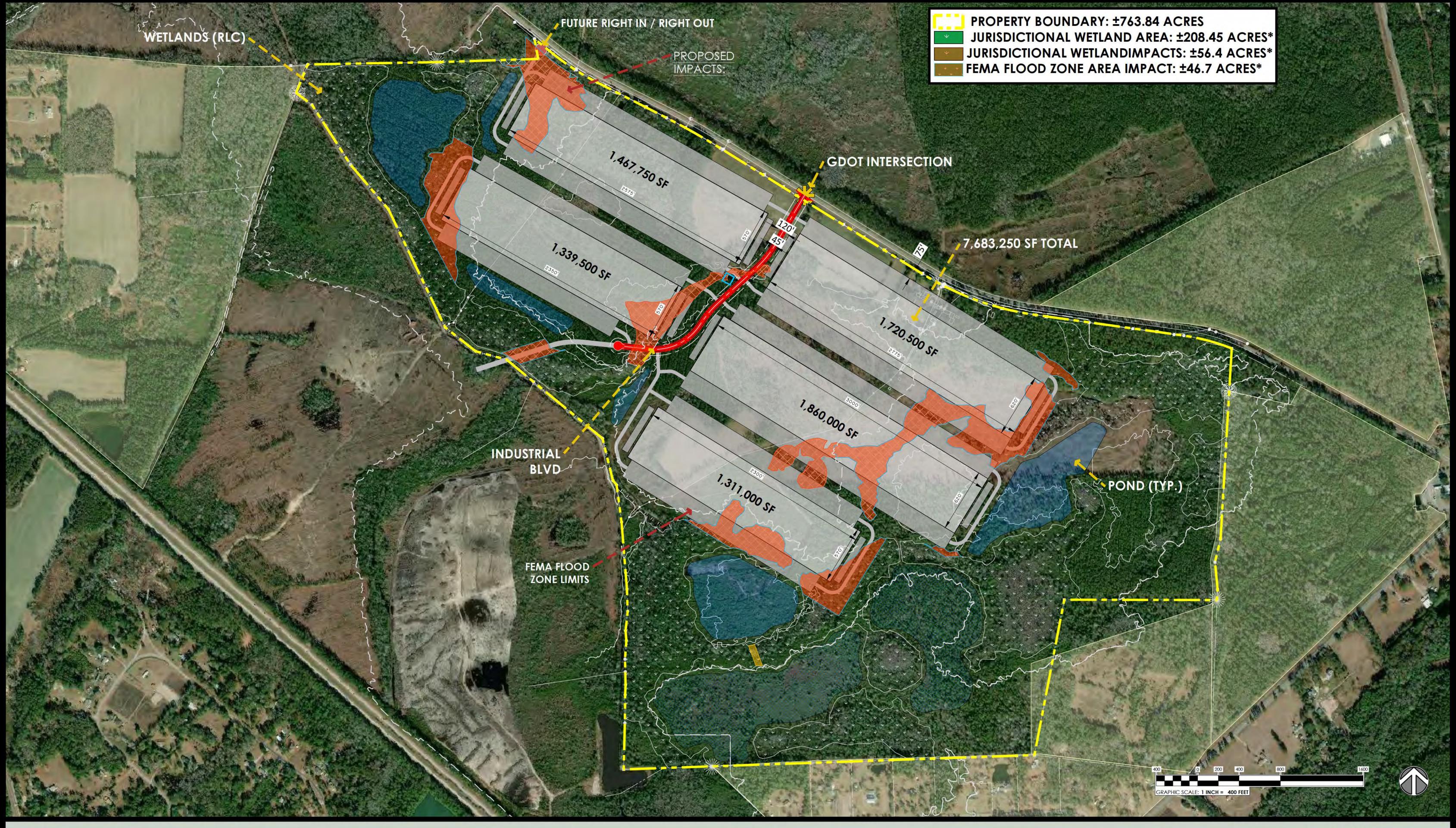


50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300

www.thomasandhutton.com

This map illustrates a general plan of the development which is for discussion purposes only, does not limit or bind the owner/developer, and is subject to change and revision without prior written notice to the holder. Dimensions, boundaries and position locations are for illustrative purposes only and are subject to an accurate survey and property description.

COPYRIGHT © 2020 THOMAS & HUTTON



PREPARED FOR:

CONCEPTUAL MASTERPLAN EXHIBIT - ALTERNATE 2

WARNELL TRACT
BRYAN COUNTY / GA

April 27, 2021



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300

www.thomasandhutton.com

This map illustrates a general plan of the development which is for discussion purposes only, does not limit or bind the owner/developer, and is subject to change and revision without prior written notice to the holder. Dimensions, boundaries and position locations are for illustrative purposes only and are subject to an accurate survey and property description.

COPYRIGHT © 2020 THOMAS & HUTTON

APPENDIX G:
Compensatory Mitigation Calculations

		NON-RIVERINE WETLAND QUALITATIVE ASSESSMENT
Project Name:		
Impact Wetland Name:		
Wetland Type:		
WAA Center Coordinates:		
Date:		
<u> </u>		
Water Storage -1		
Answer		Questions
		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
Yes		affecting the wetland? (Y/N)
Yes		Is the contributing drainage basin at least 50 percent forested? (Y/N)
FUNCTION SCORE	Moderate	
Bio Coo Chaminal Cooling	2	
BioGeoChemical Cycling - Answer	- 2	Questions
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	That the regulative community poon daveloory and our main the last 20 years. (1711)
Maintain Characteristic We	etland Commun	ity - 3
Answer		Questions
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., cummulative absolute cover across all strata)? (Y/N)
FUNCTION SCORE	Moderate	
Maintain Faunal Habitat - 4	,	Overtime
Answer		Questions
Yes Yes		Has the vegetative community been adversely altered within the last 20 years? (Y/N) 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	is the contributing drainage basin at least 50 percent forested: (1714)
TOTOTION COOKE	Moderate	
WETLAND QUALITATIVE	B	
FUNCTIONAL CAPACITY	Moderate	
SCORE		
	<u>Legen</u>	
Green Cell = User must mar		
Orange Cells = User must se		
Grey Cells = The calculation		
		input. The corresponding value is
populated from the user inpu	ut to a previous o	uestion.

		Qualitative Worksh	eet Summary For Wetla	nd Adverse Impacts		
Worksheet Number	Name of Wetland	Wetland Type	Acres of Impact (ac.)	Impact Duration	2018 Credits	Grandfathered Credits
1	Jurisdictional Wetlands	Slope Wetlands	33.06	Permanent/Reoccurring	24.80	198.40
2			0 00	Choose Duration	Credits Owed	Grandfathered Credits Owed
3			0 00	Permanent/Reoccurring	0.00	0 00
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 Cre	edits 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	33.06	24.80	198.40			
Depressional/Flat Wetlands	0.00	0.00	0.00			
Open Water/Ditch/Canal	0.00	0.00	0.00			

Worksheet 1: Qualitative Worksheet for Wetland Adverse Impacts

Project Name:	West Port Logistics Center	
Impact Wetland Name:	Jurisdictional Wetlands	
Acres of Impact (Acres):	33.06	
Wetland Type:	Slope Wetlands	
Date:	April 24, 2021	

Impact Factors	Index Description	Index Value
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
. Product of Total WQFC Impact and Acres (<u>Total 2018 Wetland Credits Owed</u>) =		24.80
7. Conversion of Total 2018 Wetland Compensation to Grandfathered Credits (Grandfathered Wetland Credits Owed) =		198.40

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.