

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

June 26, 2020

Regulatory Division SAS-2020-00291

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-2020-00291

Applicant: Mr. John Sawyer

Blitchton Timberlands, LLC

1600 Parkwood Circle, Suite 200

Atlanta, Georgia 30339

Agent: Mr. Alton Brown

Resource and Land Consultants

41 Park of Commerce Way, Suite 101

Savannah Georgia 31405

<u>Location of Proposed Work</u>: The project area totals approximately 809.54 acres located between Highway 80, Warnell Farm Road, Eldora Road and Brooks Road within Bryan County, Georgia (Latitude 32.2202°, Longitude -81.4574).

<u>Description of Work Subject to the Jurisdiction of the U.S. Army Corps of Engineers:</u> The applicant is proposing to impact 65.52 acres of wetland and 1.35 acres of ditch for 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, Warnell Farms Road, Eldora Road and Brooks Road. Thirteen buildings will be constructed ranging from 87,500 square feet to 1,185,000 square feet and totaling 6,774,250 square feet. Truck parking and employee parking are provided on each side of the buildings. Sixteen 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 the enclosure labeled Appendix D.

To mitigate for the proposed impacts, the applicant would purchase 385.04 grandfathered wetland credits from a Corps approved compensatory mitigation bank that services the Lower Ogeechee watershed (HUC 03060202).

BACKGROUND

The project site totals 809.54 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 a portion of it has been verified by the U.S. Army Corps of Engineers (Corps) while the remainder of the property has been submitted for verification. According to the agent, the project area contains 528.18 acres of upland, 280.94 acres of wetland and 0.42 acres of pond. These habitats generally include agricultural fields, clear cuts, cutover depressional wetlands and forested slope wetlands. Land management techniques historically applied to the tract have included agriculture farming and timber management. The majority of the timber within the property was harvested in 2010-2013 and since that time has been 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

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

<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.

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

U.S. ARMY CORPS OF ENGINEERS

The Savannah District must consider the purpose and the impacts of the applicant's proposed work, prior to a decision on issuance of a Department of the Army permit.

<u>Cultural Resources Assessment</u>: According to the Georgia's Natural, Archaeological, and Historic Resources GIS database, the property does not contain any cultural or archaeological sites. Brockington & Associates has been retained by the applicant to complete a Phase I cultural and archeological resources assessment. A draft report will be prepared and submitted to the Corps and Georgia Department of Natural Resources-Historic Preservation Division for review

<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 Indigo snake (*Drymarchon corais couperi*), wood stork (*Mycteria Americana*); 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.

Public Interest Review: The decision whether to issue a permit will be based on an evaluation of the probable impact including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors, which may be relevant to the proposal will be considered including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership and in general, the needs and welfare of the people.

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

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

<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: Ms. Sarah E. Wise, 100 West Oglethorpe Avenue Savannah, Georgia 31401-3604, no later than 30 days from the date of this notice. Please refer to the applicant's name and the application number in your comments.

If you have any further questions concerning this matter, please contact Ms. Sarah E. Wise, Team Lead, Coastal Branch at 912-652-5550 or sarah.e.wise@usace.army.mil.

Enclosures

Bryan County Logistics Center

SECTION 404 INDIVIDUAL PERMIT APPLICATION JUNE 2020

Applicant: Blitchton Timberlands, LLC

Agent: Resource & Land Consultants

Engineer: Thomas & Hutton





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APPENDIX:

A: CESAS Form 19

B: Figures/Site Maps

C: USACE Jurisdictional Determination

D: Permit Drawings (Applicant's Preferred Alternative)

E: Off-Site Alternatives Information

F: On-Site Configurations

G: Compensatory Mitigation Calculations

H: IPaC Database & Edges Information

I: GNAHRGIS Public Database Information

J: Adjacent Landowner Information

K: Gilbert & Ezelle MARKETBEAT Report

Bryan County Logistics Center Project Description June 2020

1.0 INTRODUCTION:

Blitchton Timberlands, LLC is proposing the construction of a Logistics Center located within Bryan County. The project area totals approximately 809.54 acres located between Highway 80, Warnell Farm Road, Eldora Road and Brooks Road within Bryan County, Georgia (32.220202°, -81.457399°). 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. The proposed project will include a variety of industrial product types including facilities as small as 87,000 square feet and as large as 1,000,000 square feet. This variety of product types will allow the logistics center to satisfy the diverse industrial market needs of the community and businesses using the Port of Savannah.

2.0 BACKGROUND:

The regional market (Chatham, Effingham, Bryan, and Liberty Counties) currently contains 72 million square feet of warehousing space, and an additional 6 million square feet is under construction and scheduled to come to market in 2020. Of these 6 million square feet, 65% is preleased and the remaining 35% is projected to be leased in 6 months. As a result of the USACE Savannah Harbor Expansion Project and the Savannah Ports' record growth, published market projections call for an additional 25 million square feet by 2025 (Appendix K). 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 Georgia Foreign Trade Conference on 4 February 2020. Considering these projections and current regional vacancy rates of less 2.1%, this project will be critical for the region and GPA has issued several calls to the private sector to deliver more industrial space to the Greater Savannah Area Market. This project is a direct response to GPA's call, as well as to broad market demands.

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.

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 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, with approximately 6 million square feet 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 809.54 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 a portion of it has been verified by the U.S. Army Corps of Engineers (USACE) while the remainder of the property has been submitted for verification. The project area contains 528.18 acres of upland, 280.94 acres of wetland and 0.42 acres of pond. These habitats generally include agricultural fields, clear cuts, cutover depressional wetlands and forested slope wetlands. Land management techniques historically applied to the tract have included agriculture farming and timber management. The majority of the timber within the property was harvested in 2010-2013 and since that time has been 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, Warnell Farms Road, Eldora Road and Brooks Road. Thirteen buildings will be constructed ranging from 87,500 square feet to 1,185,000 square feet and totaling 6,774,250 square feet. Truck parking and employee parking are provided on each side of the buildings. Sixteen 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 65.52 acres of aquatic resource impacts including wetland impact 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 eight 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 brief 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 Bryan County and the I-16 corridor of Bryan County.
- 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 semi-trailer trucks.
 For this project, three 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 95 or 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 809.54 acres generally located between Highway 80, Warnell Farm Road, Eldora Road and Brooks Road 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 totals 809.54 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 will occur prior to initiation of development.
 - 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 706 acres located adjacent to and south 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 applicant approached the property owner regarding purchase of the property and the owner was not willing to sell the property to the applicant.
 - 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 706 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 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.

- **6.3 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 16 buildings ranging from 87,500 square feet to 1,185,000 square feet, 16 stormwater detention basins, truck access and parking and employee parking. This configuration totals 7,564,250 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 16 buildings ranging from 87,500 square feet to 1,185,000 square feet, 14 stormwater detention basins, truck access and parking and employee parking. This configuration totals 7,004,250 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 13 buildings ranging from 87,500 square feet to 1,185,000 square feet, 16 stormwater detention basins, truck access and parking and employee parking. This configuration totals 6,774,250 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	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	Yes	Yes	Yes	No
Capable of being done considering geographic location	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	No
Capable of being done considering zoning	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Capable of being done considering utilities	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Capable of being done considering access	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No
Capable of being done considering availability	Yes	No	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	No
Practicable Site (Y or N)	Yes	No	Yes	No	Yes	Yes	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.
- <u>Flood Plain Impacts</u>: 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: The applicants preferred site and the preferred on-site configuration includes 13 buildings ranging from 87,500 square feet to 1,185,000 square feet, 16 stormwater detention basins, truck access and parking and employee parking. This configuration totals 6,774,250 square feet of warehouse space. The NWI indicates the 809.54 project site contains 211.6 acres of wetland and 597.4 acres of upland. The formal aquatic resources delineation documents approximately 279.02 acres of wetland, 1.5 acres of ditch and 0.42 acres of pond. 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.
- Stream Impacts (qualitative). Not applicable.
- <u>Wetland Impacts (quantitative)</u>. Based on the NWI, approximately 82.3 acres of wetland would be impacted by the proposed project. The aquatic resources delineation that has been completed within the project area indicates 65.5 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.
- Impacts to Other Waters (quantitative). 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 the proposed project.
- 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.
- <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, no 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.
- 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.
- <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.
- Stream Impacts (qualitative). Not applicable.
- <u>Wetland Impacts (quantitative)</u>. 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.
- 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 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 16 buildings ranging from 87,500 square feet to 1,185,000 square feet, 16 stormwater detention basins, truck access and parking and employee parking. This configuration totals 7,564,250 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 111.6 acres of wetland would be impacted by the proposed project. The aquatic resources delineation that has been completed within the project area indicates 93.9 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 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.
- Impacts to Other Waters (quantitative). 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.
- 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.

- Stream Buffer Impact. Not applicable. No streams are located within this property.
- <u>Floodplain Impacts</u>: Based on review of available FEMA maps, no 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 and floodplain impact. The design includes 16 buildings ranging from 87,500 square feet to 1,185,000 square feet, 14 stormwater detention basins, truck access and parking and employee parking. This configuration totals 7,004,250 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.
- <u>Wetland Impacts (quantitative)</u>. Based on the NWI, approximately 96.6 acres of wetland would be impacted by the proposed project. The aquatic resources delineation that has been completed within the project area indicates 78.3 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 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. 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.
- <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, no 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					
Environmental Factors	Alternative & Configuration	Off-Site Alt 2	Off-Site Alt 4	Off-Site Alt 5	On-Site Conf 1	On-Site 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	82.3/65.52	362.2	169.6	79.4	111.6/93.9	96.6/78.3
Functional Value of Impacted Wetland	Moderate	Moderate	Moderate	Moderate	Moderate	Moderate
Impacts to Other Waters (Acres) NWI/Delineation	None/1.35	None	None	None	None/1.35	None/1.35
Functional Value of Impacted Other Waters	Low	N/A	N/A	Moderate	Low	Low
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)	0	351	208	250	0	0
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 28.38 acres through the proposed design and facility layout and the 790,000 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 in April and May 2020. At no time during the survey was a listed species or critical habitat associated with a listed species observed. Based on observations during the site visit, existing habitats documented within the site, absence of listed species and geographic location of the project, no adverse impacts to protected species will occur in association with the proposed project.

8.0 CULTURAL RESOURCES:

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 any and all stormwater management requirements of the local authorities. It should be noted that construction of stormwater management facilities will occur within uplands only and impacts to jurisdictional waters of the U.S. and/or wetlands will not be required.

10.0 COMPENSATORY MITIGATION

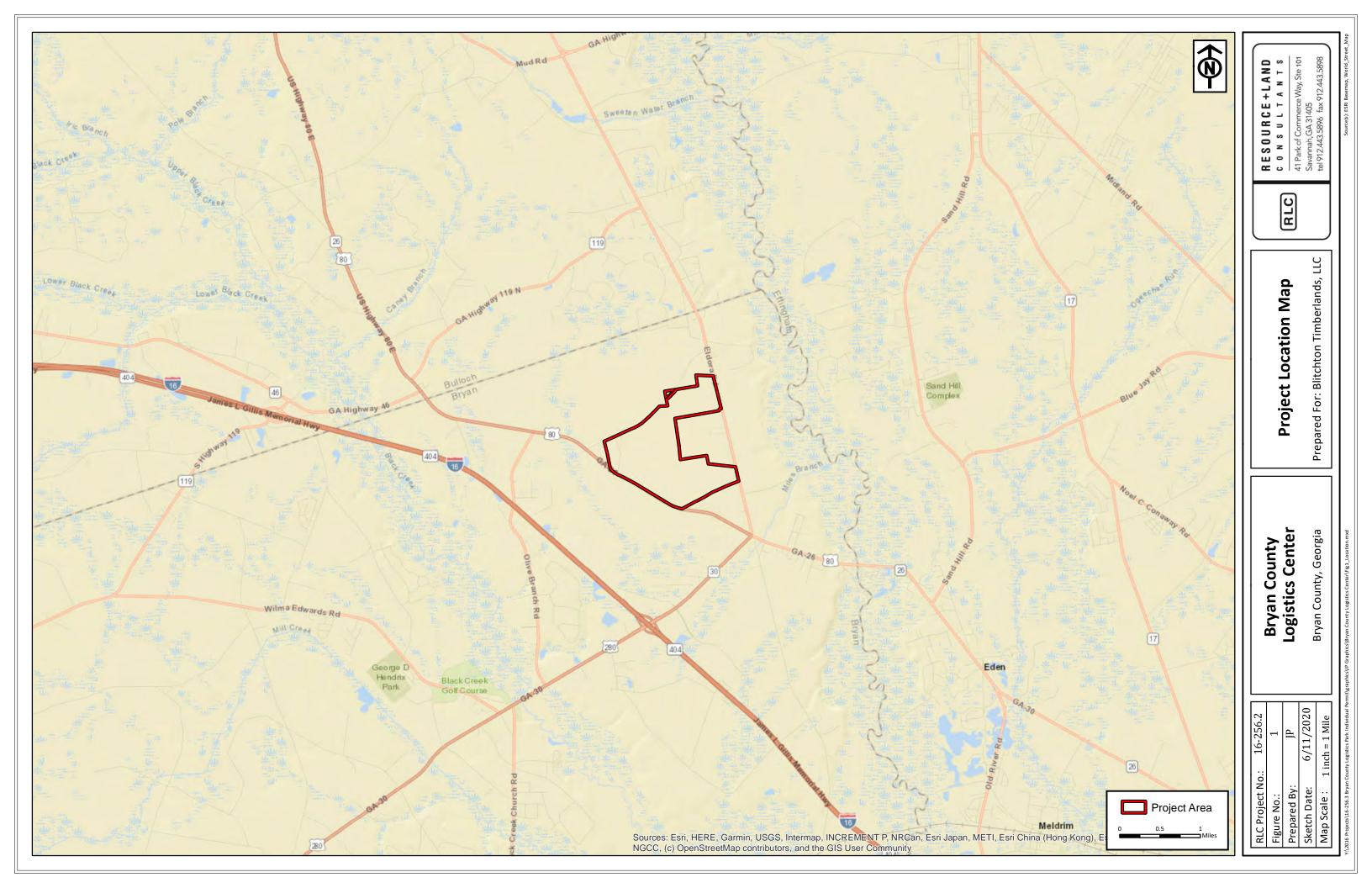
The proposed project requires 65.52 acres of aquatic resource impacts including 64.17 acres of wetland impact and 1.35 acres of ditch impact. As documented in the attached mitigation credit calculations, the project will require 385.04 wetland mitigation credits to off-set aquatic resource impacts. As compensatory mitigation, the applicant is proposing to purchase available mitigation credits from approved mitigation banks that service the Lower Ogeechee watershed (HUC 03060202). Following issuance of the permit and prior to initiation of authorized impacts, 385.04 wetland credits will be purchased from a USACE approved primary service area mitigation bank.

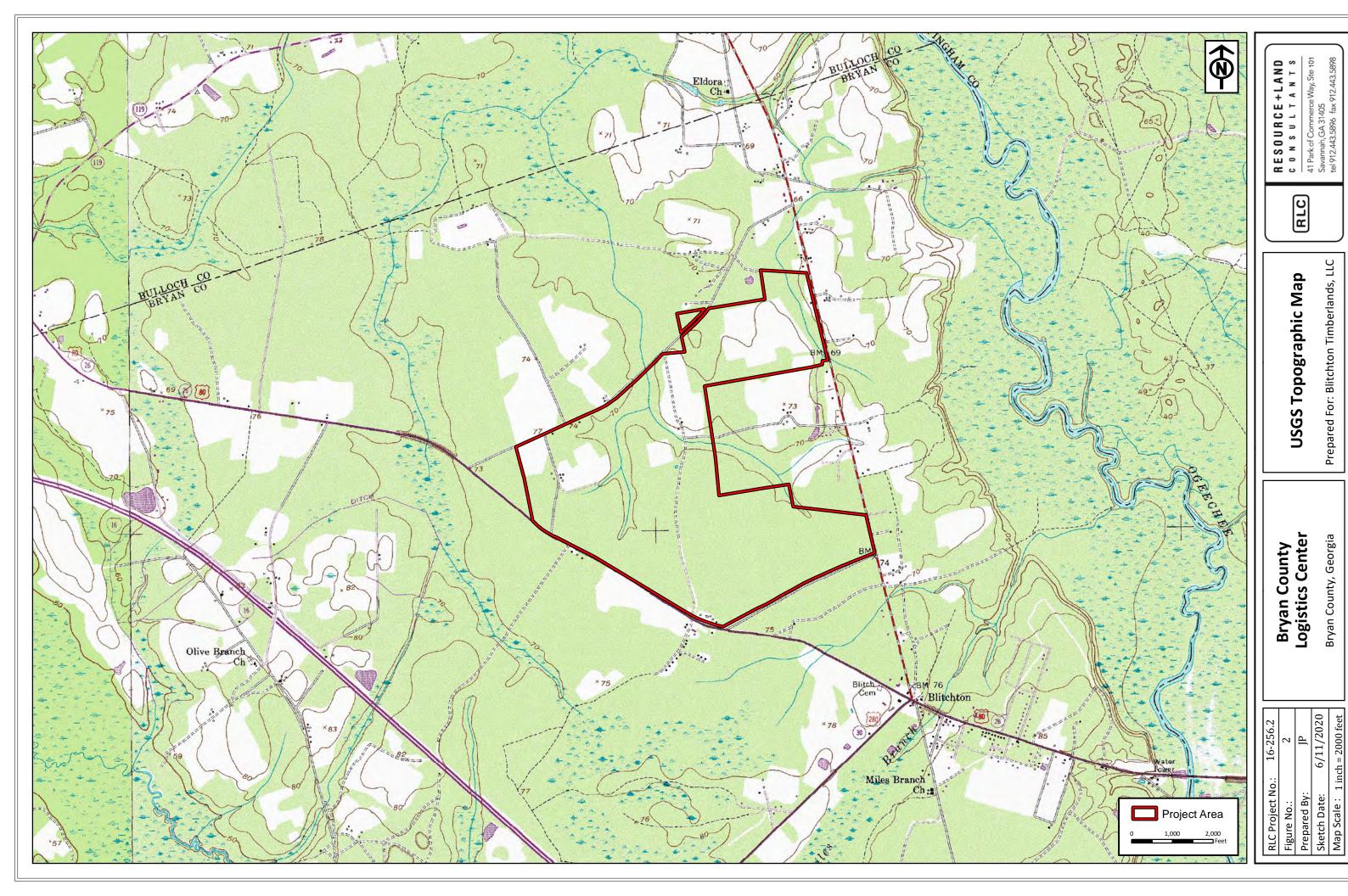
11.0 CONCLUSION

Blitchton Timberlands, LLC is proposing the development of a logistics center between Highway 80, Warnell Farm Road, Eldora Road and Brooks Road within Bryan County, Georgia (32.220202°, -81.457399°). The industrial warehousing complex will contain approximately 6,774,250 square feet of warehouse space which will serve the Port of Savannah and the Bryan County Interstate 16 corridor. As compensatory mitigation for the 65.52 acres of aquatic resource impact, the applicant is proposing to purchase 385.04 wetland mitigation credits from an approved 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.



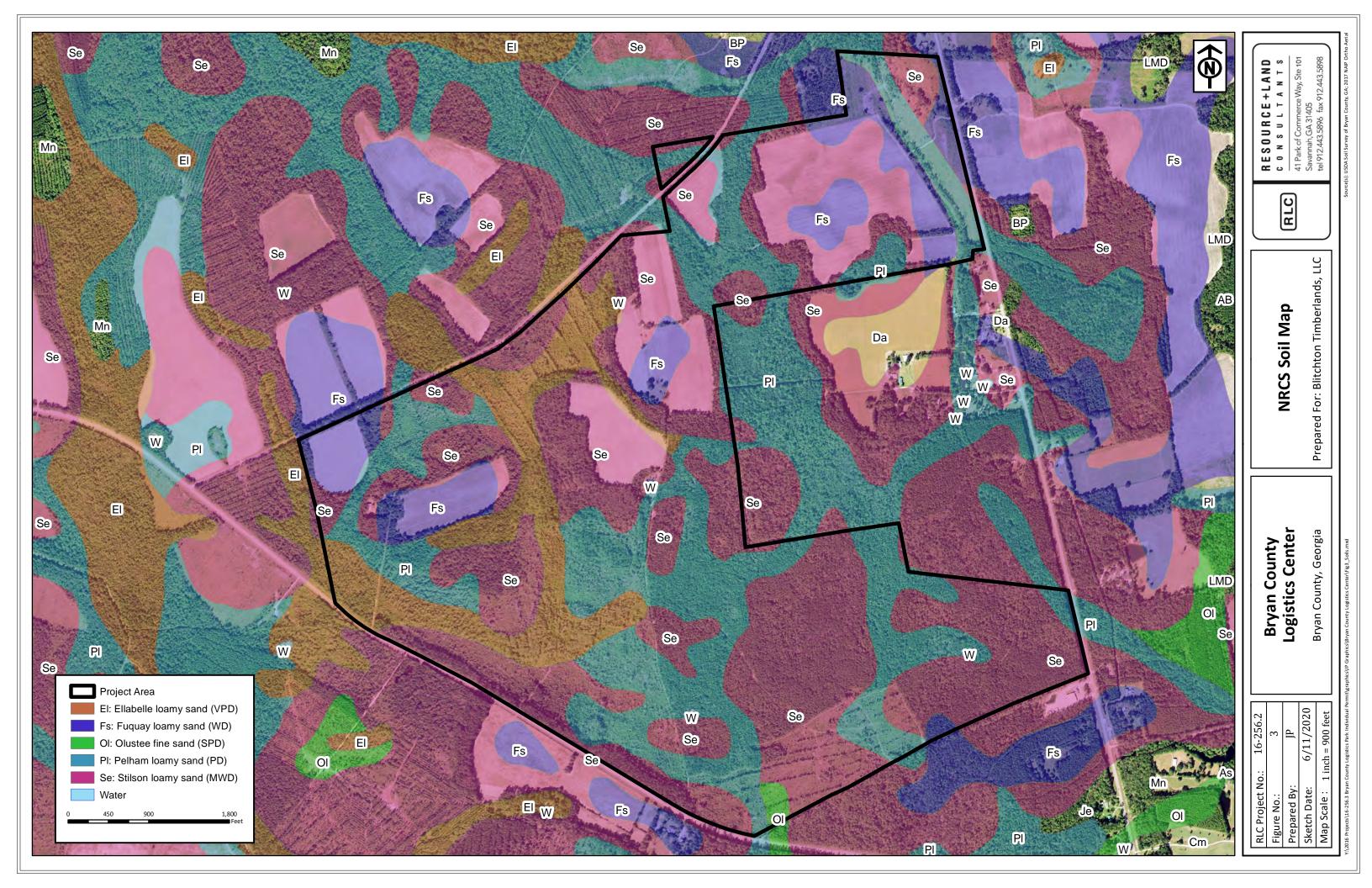
APPENDIX B:
Figures/Site Maps
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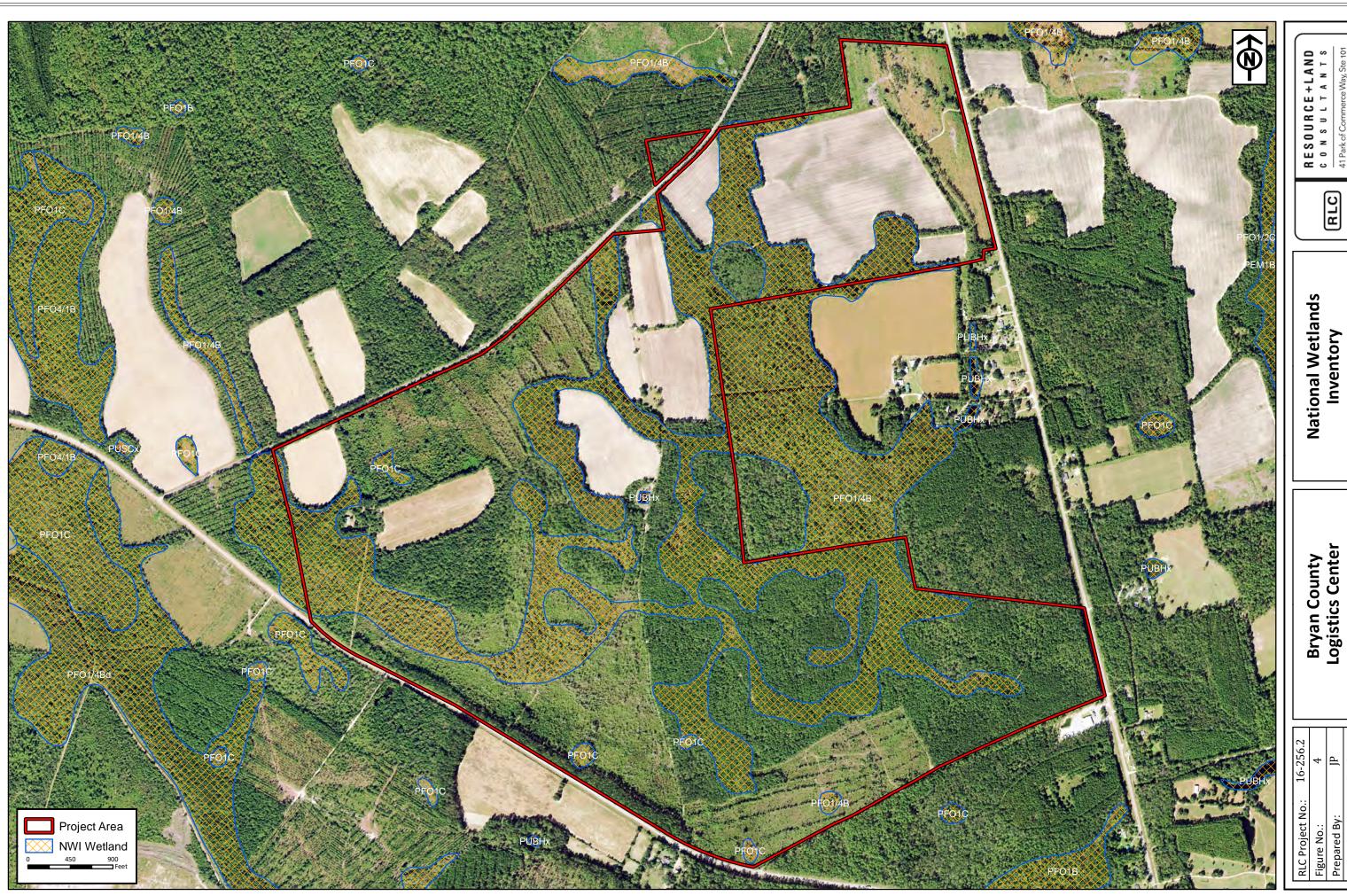




ts\16-256.3 Bryan County Logistics Park Individual Permit\graphics\IP Graphics\Bryan County Logistics Center\F\@2_Top

urce(s): USGS Topographic Survey Bryan Cc





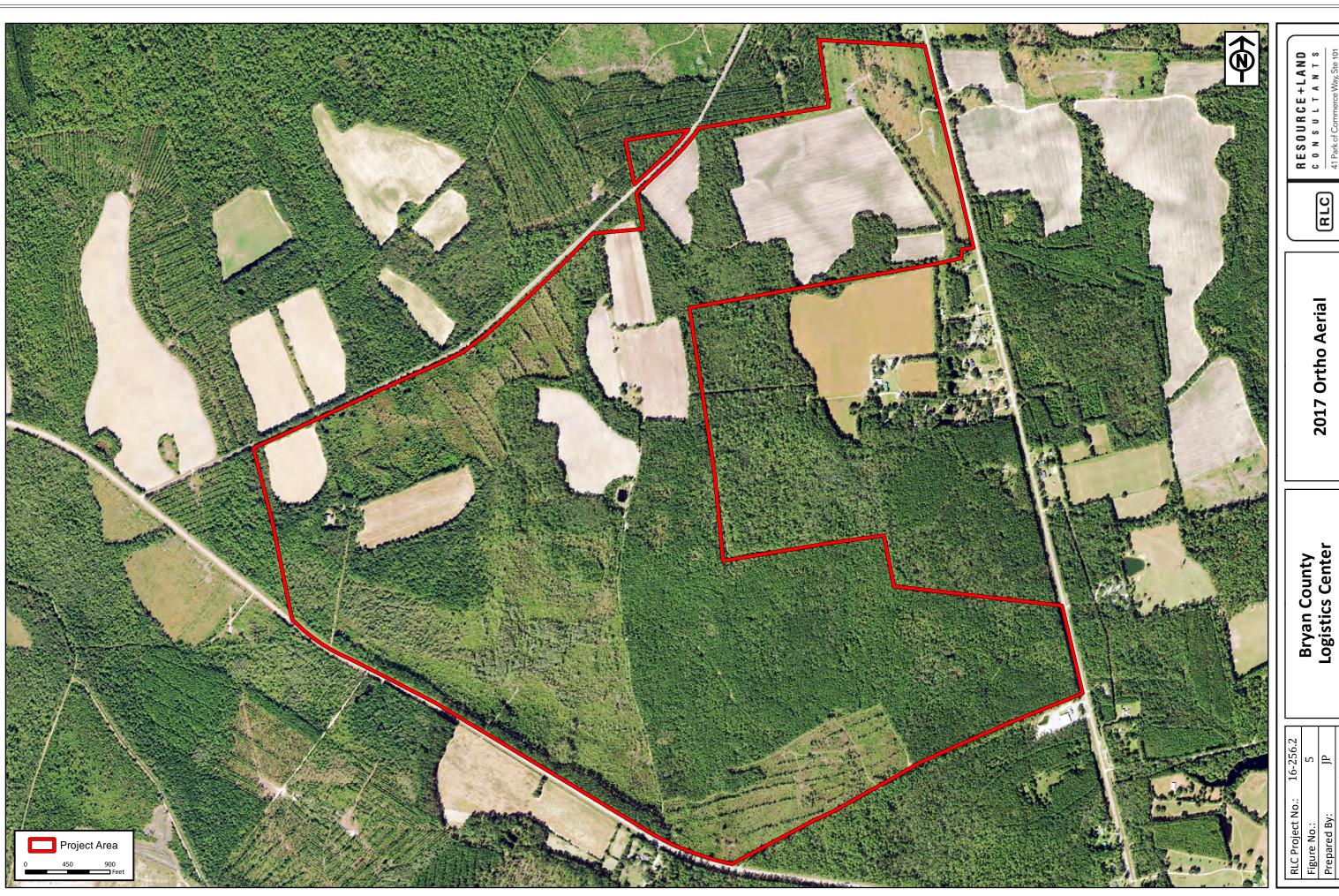
National Wetlands Inventory

Bryan County, Georgia

Prepared For: Blitchton Timberlands, LLC

RESOURCE+LAND CONSULTANTS

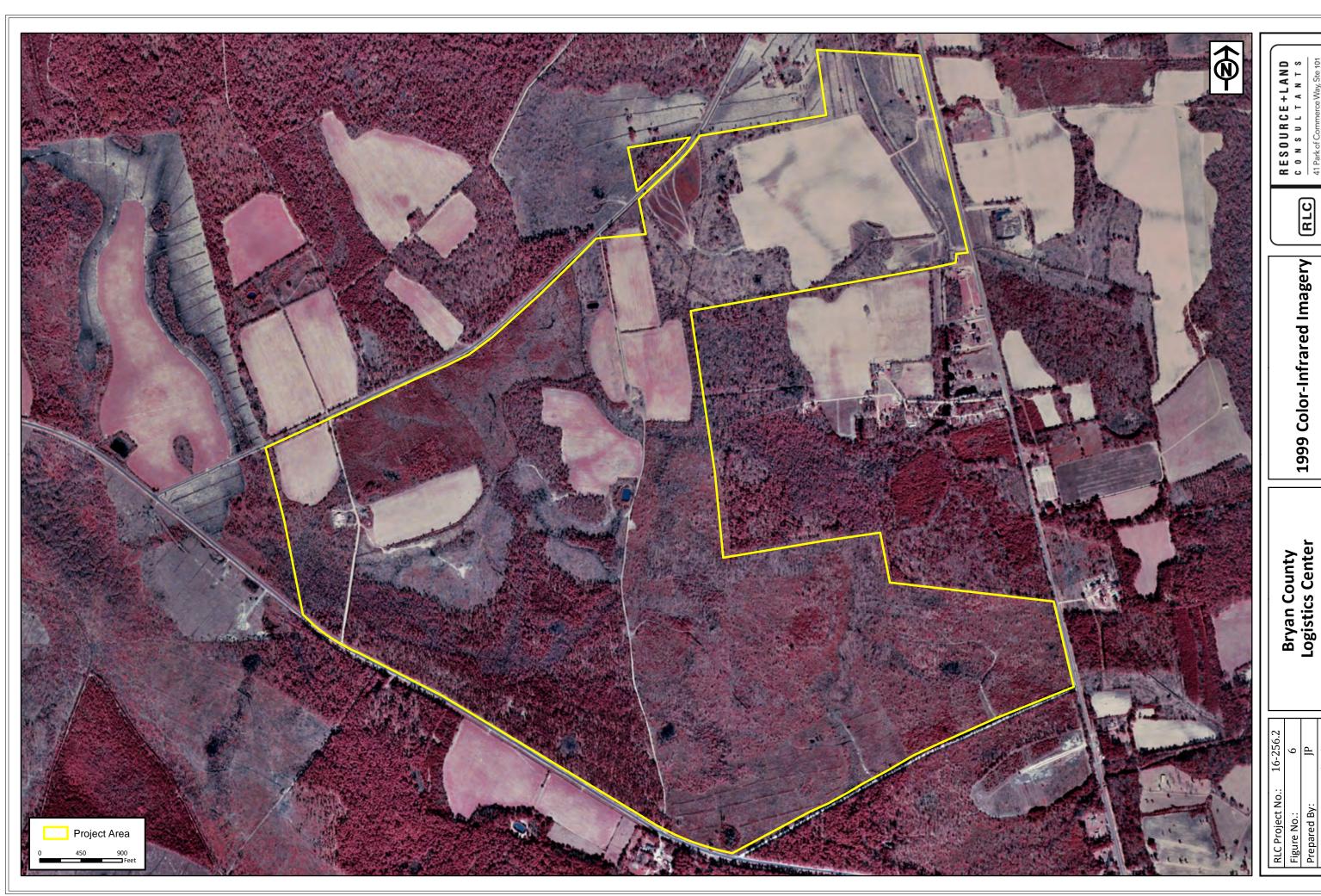
RLC



2017 Ortho Aerial

Prepared For: Blitchton Timberlands, LLC

Bryan County, Georgia

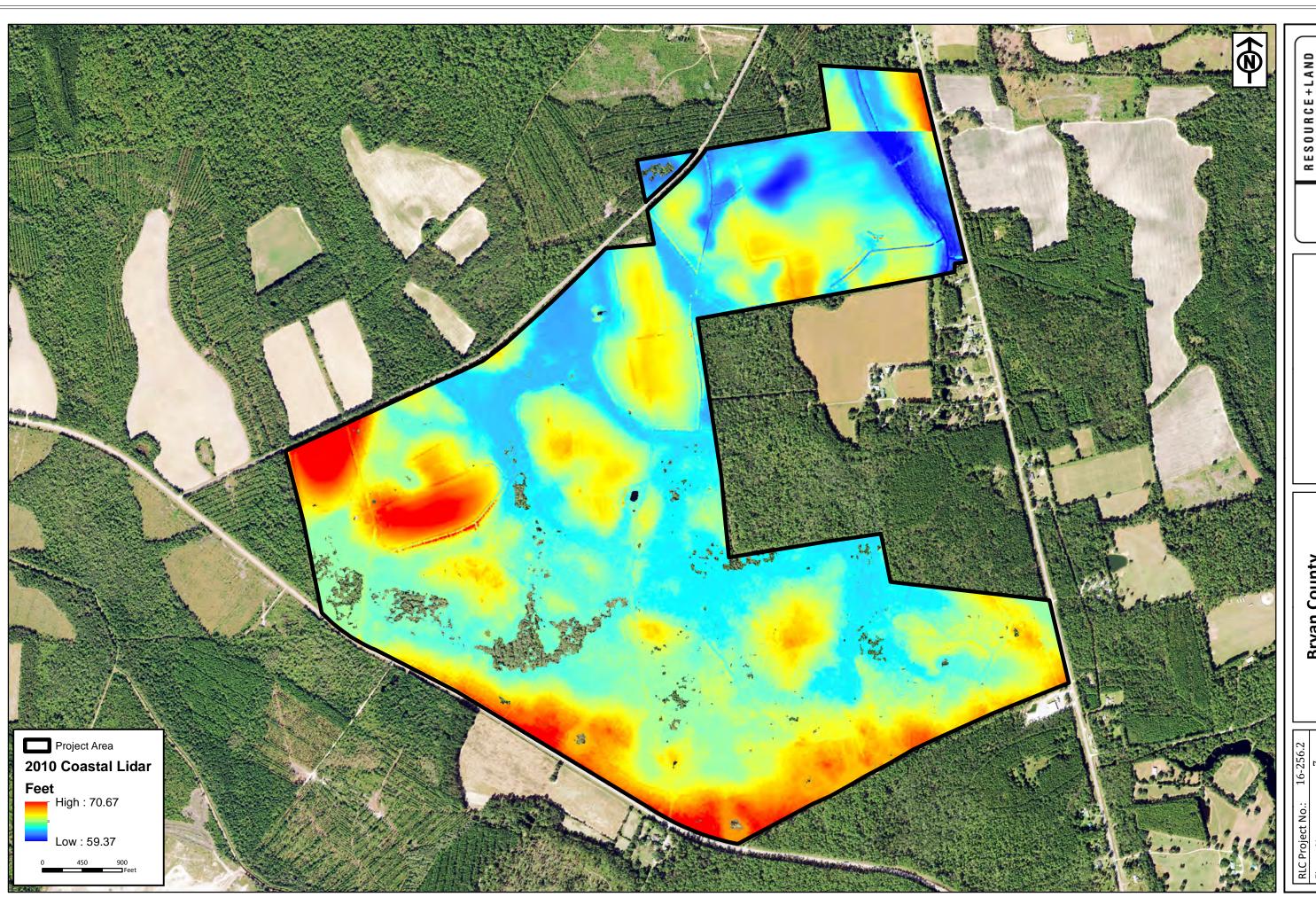


1999 Color-Infrared Imagery

RLC

Prepared For: Blitchton Timberlands, LLC

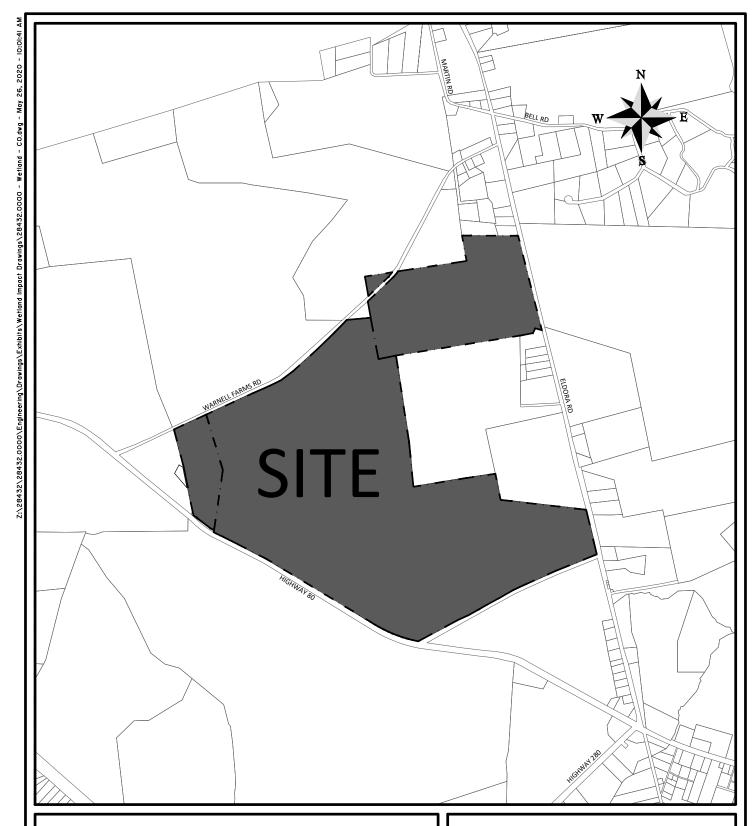
Bryan County, Georgia



NOAA Topographic Lidar

Prepared For: Blitchton Timberlands, LLC

APPENDIX D: Permit Drawings		



BRYAN COUNTY LOGISTICS CENTER

PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT LOCATION MAP

CLIENT:

BLITCHTON TIMBERLANDS, LLC

LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 DRAWN BY: ATL SHEET: P01

JOB NUMBER: J-28432.0000 REVIEWED BY: KMS SCALE: 1" = 2000'



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LEGEND

ACREAGE SUMMARY TABLE

TOTAL PROJECT ACREAGE

809.54 AC

* * *

TOTAL JURISDICTIONAL AREA

280.94 AC.

177

Z?\28432\28432.0000\Engineering\Drawing\$\Exhibits\Wetland Impact Drawings\28432.0000 - Wetland - CO.dwg - May 26, 2020 - 10:01:41

TOTAL POND AREA

0.42 AC.

TOTAL UPLAND AREA

528.18 AC.

JURISDICTIONAL IMPACTS

JURISDICTIONAL IMPACTS

WETLAND IMPACT

64.17 AC

0000

DITCH IMPACT

1.35 AC

TOTAL JURISDICTIONAL IMPACTS

65.52 AC.

BRYAN COUNTY LOGISTICS CENTER

PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT LEGEND

CLIENT:

BLITCHTON TIMBERLANDS, LLC

LOCATION: BRYAN COUNTY, GEORGIA DATE: MAY 26, 2020 DRAWN

JOB NUMBER: J-28432.0000

DRAWN BY: ATL

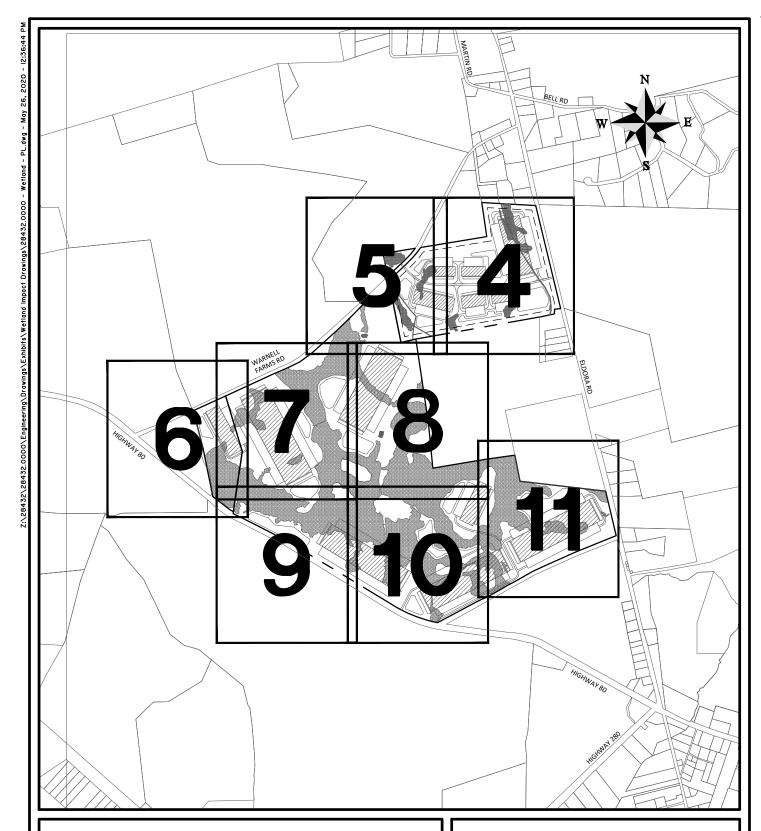
REVIEWED BY: KMS

SHEET: P02 SCALE: NTS



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BRYAN COUNTY LOGISTICS CENTER

PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT INDEX

CLIENT:

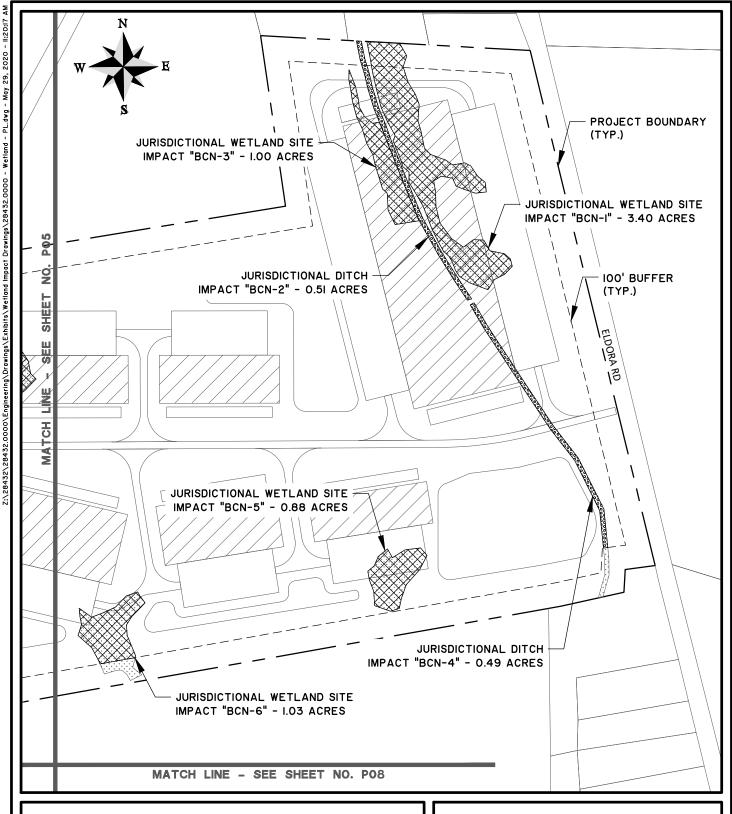
BLITCHTON TIMBERLANDS, LLC

LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 JOB NUMBER: J-28432.0000 DRAWN BY: ATL REVIEWED BY: KMS SHEET: P03 SCALE: 1" = 2000' THOMAS HUTTON

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PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT DRAWINGS

CLIENT:

BLITCHTON TIMBERLANDS, LLC

LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 JOB NUMBER: J-28432.0000

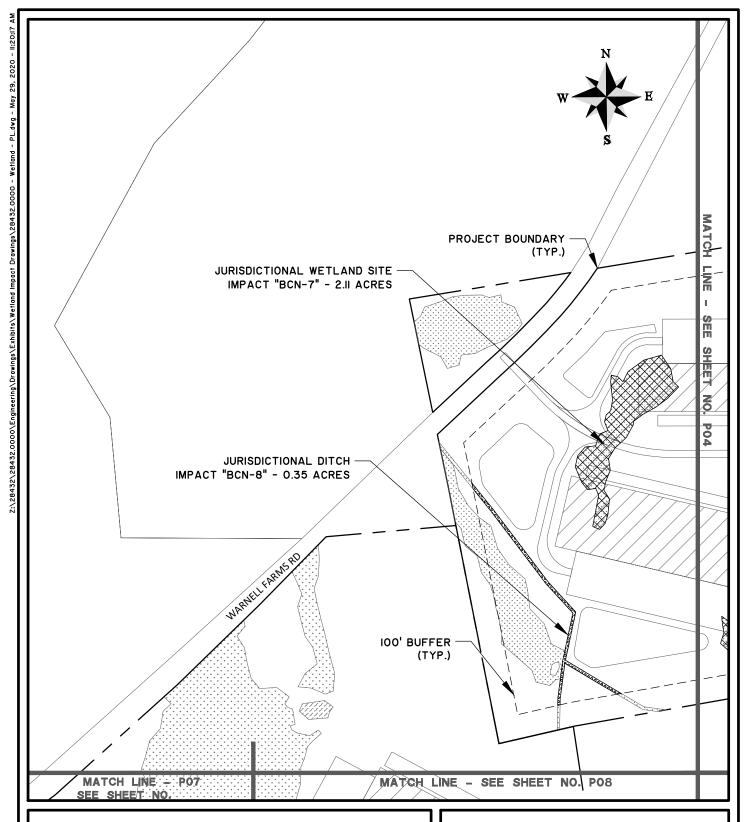
DRAWN BY: ATL

REVIEWED BY: KMS

SHEET: P04 SCALE: 1" = 400'



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PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT DRAWINGS

CLIENT:

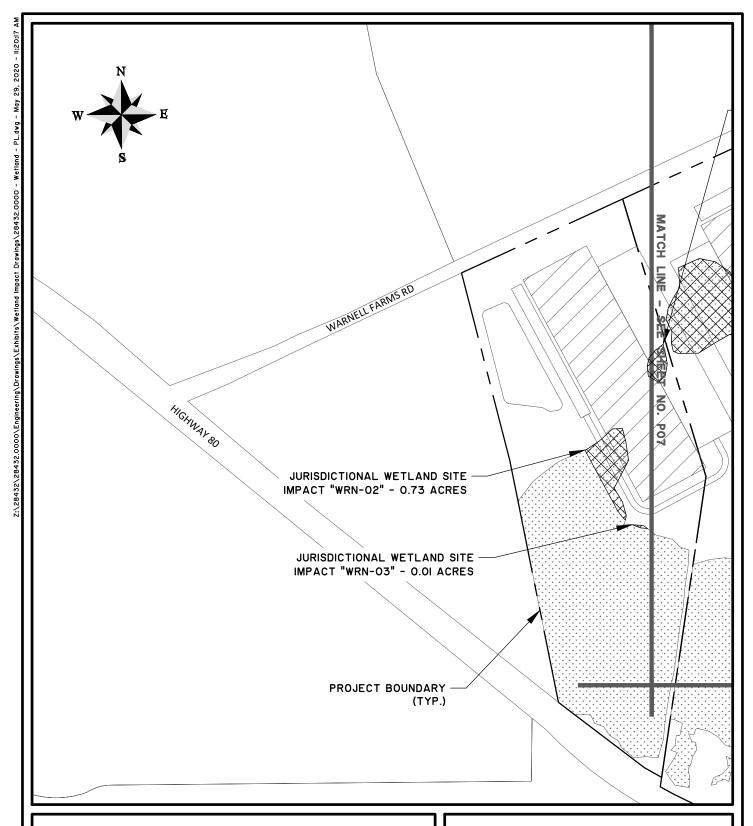
BLITCHTON TIMBERLANDS, LLC

LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 JOB NUMBER: J-28432.0000 DRAWN BY: ATL REVIEWED BY: KMS SHEET: P05 SCALE: 1" = 400'



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300



PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT DRAWINGS

CLIENT:

BLITCHTON TIMBERLANDS, LLC

LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 DRAWN BY: ATL SHEET: P06

JOB NUMBER: J-28432.0000 REVIEWED BY: KMS SCALE: 1" = 400'



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PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT DRAWINGS

CLIENT:

BLITCHTON TIMBERLANDS, LLC

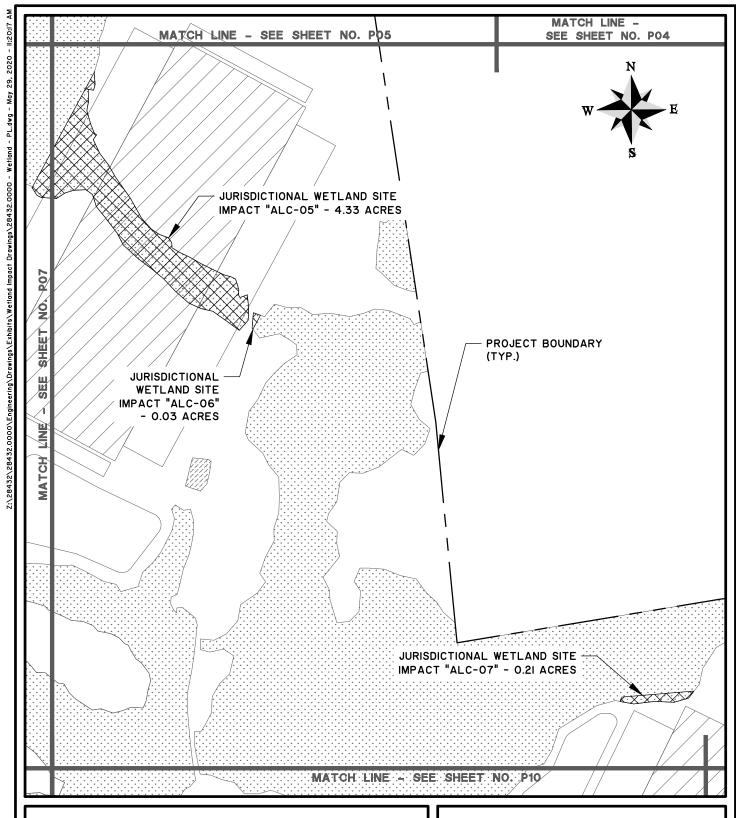
LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 DRAWN BY: ATL SHEET: P07

JOB NUMBER: J-28432.0000 REVIEWED BY: KMS SCALE: 1" = 400'



50 Park of Commerce Way Savannah, GA 31405 • 912.234.5300



PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT DRAWINGS

CLIENT:

BLITCHTON TIMBERLANDS, LLC

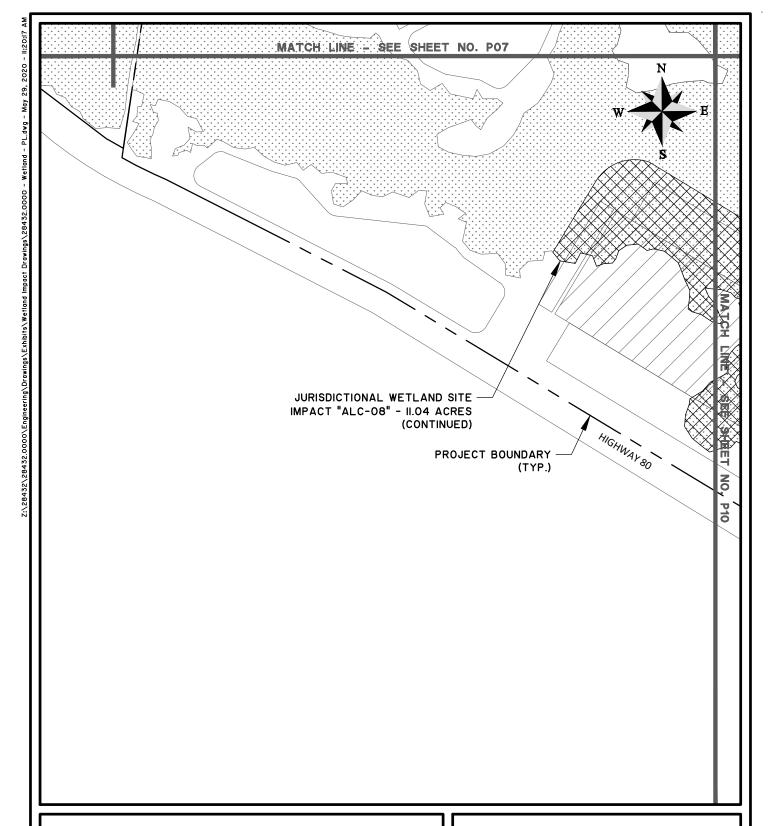
LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 DRAWN BY: ATL SHEET: P08

JOB NUMBER: J-28432.0000 REVIEWED BY: KMS SCALE: 1" = 400'



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PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT DRAWINGS

CLIENT:

BLITCHTON TIMBERLANDS, LLC

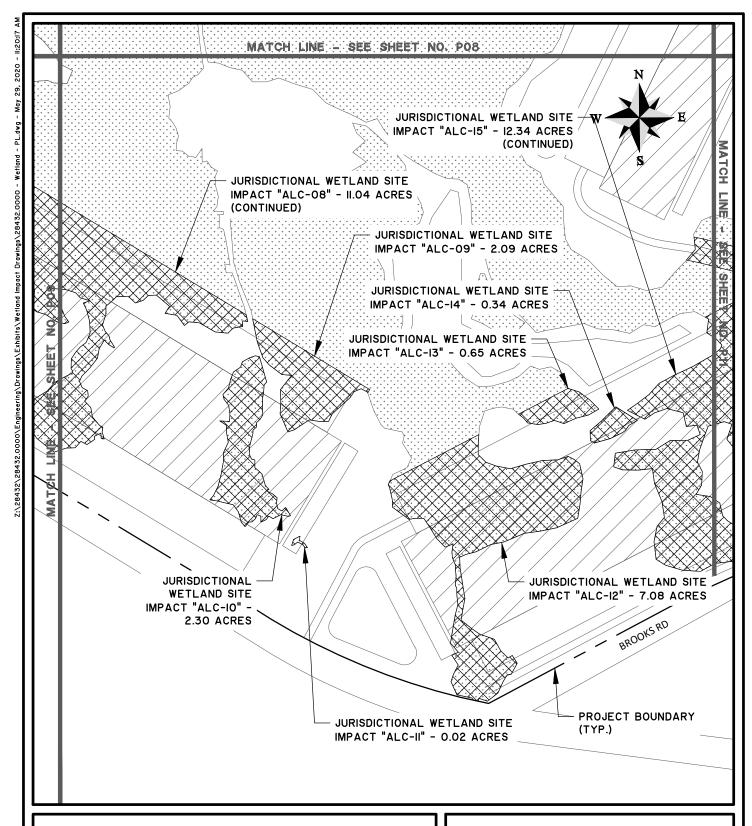
LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 DRAWN BY: ATL SHEET: P09

JOB NUMBER: J-28432.0000 REVIEWED BY: KMS SCALE: 1" = 400'



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PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT DRAWINGS

CLIENT:

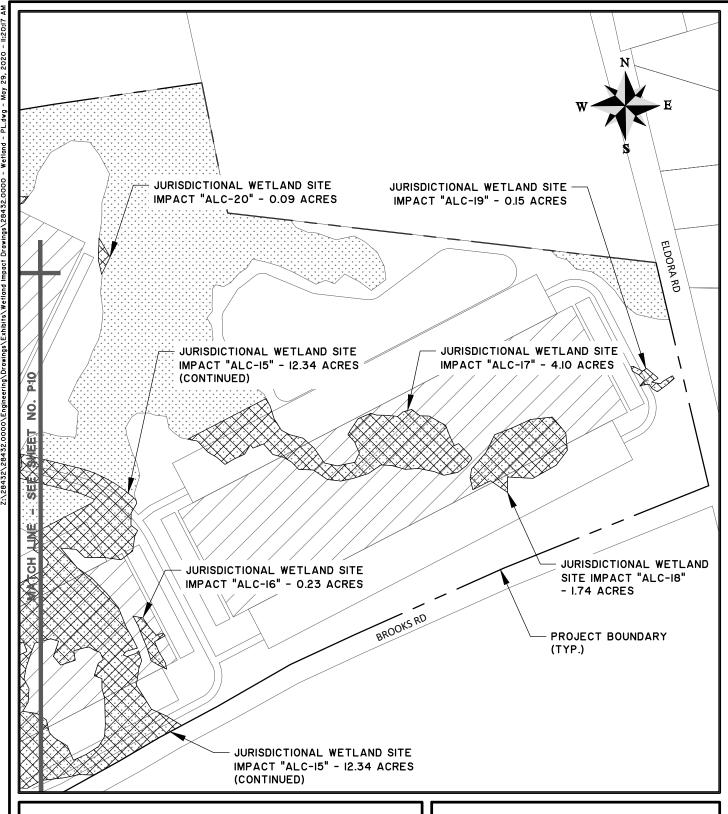
BLITCHTON TIMBERLANDS, LLC

LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 JOB NUMBER: J-28432.0000 DRAWN BY: ATL REVIEWED BY: KMS SHEET: P10 SCALE: 1" = 400'



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PROPOSED ACTIVITY

WETLAND IMPACT PERMIT DRAWINGS

CLIENT:

BLITCHTON TIMBERLANDS, LLC

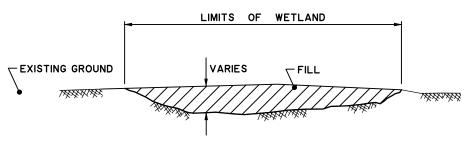
LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 DRAWN BY: ATL SHEET: P11

JOB NUMBER: J-28432.0000 REVIEWED BY: KMS SCALE: 1" = 400'

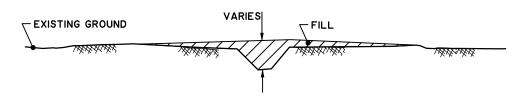


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WETLAND FILL SECTION

NOT TO SCALE



DITCH FILL SECTION

NOT TO SCALE

BRYAN COUNTY LOGISTICS CENTER

PROPOSED ACTIVITY:

WETLAND IMPACT PERMIT SECTIONS

CLIENT:

BLITCHTON TIMBERLANDS, LLC

LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 26, 2020 DRAWN BY: ATL SHEET: P12
JOB NUMBER: J-28432.0000 REVIEWED BY: KMS SCALE: NTS



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CONCEPTUAL MASTERPLAN BRYAN COUNTY LOGISTICS CENTER BRYAN COUNTY / GA

MAY 21, 2020



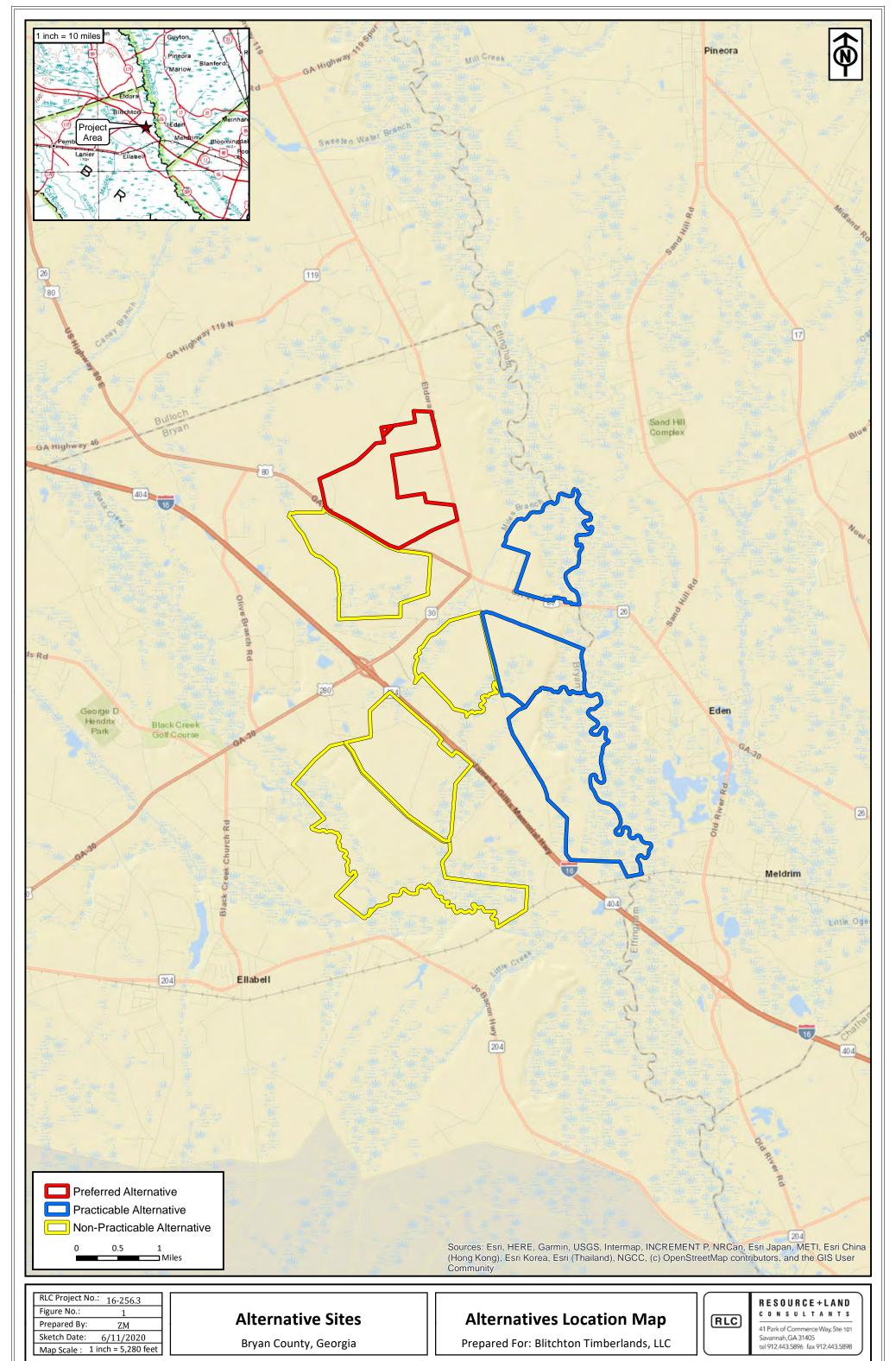
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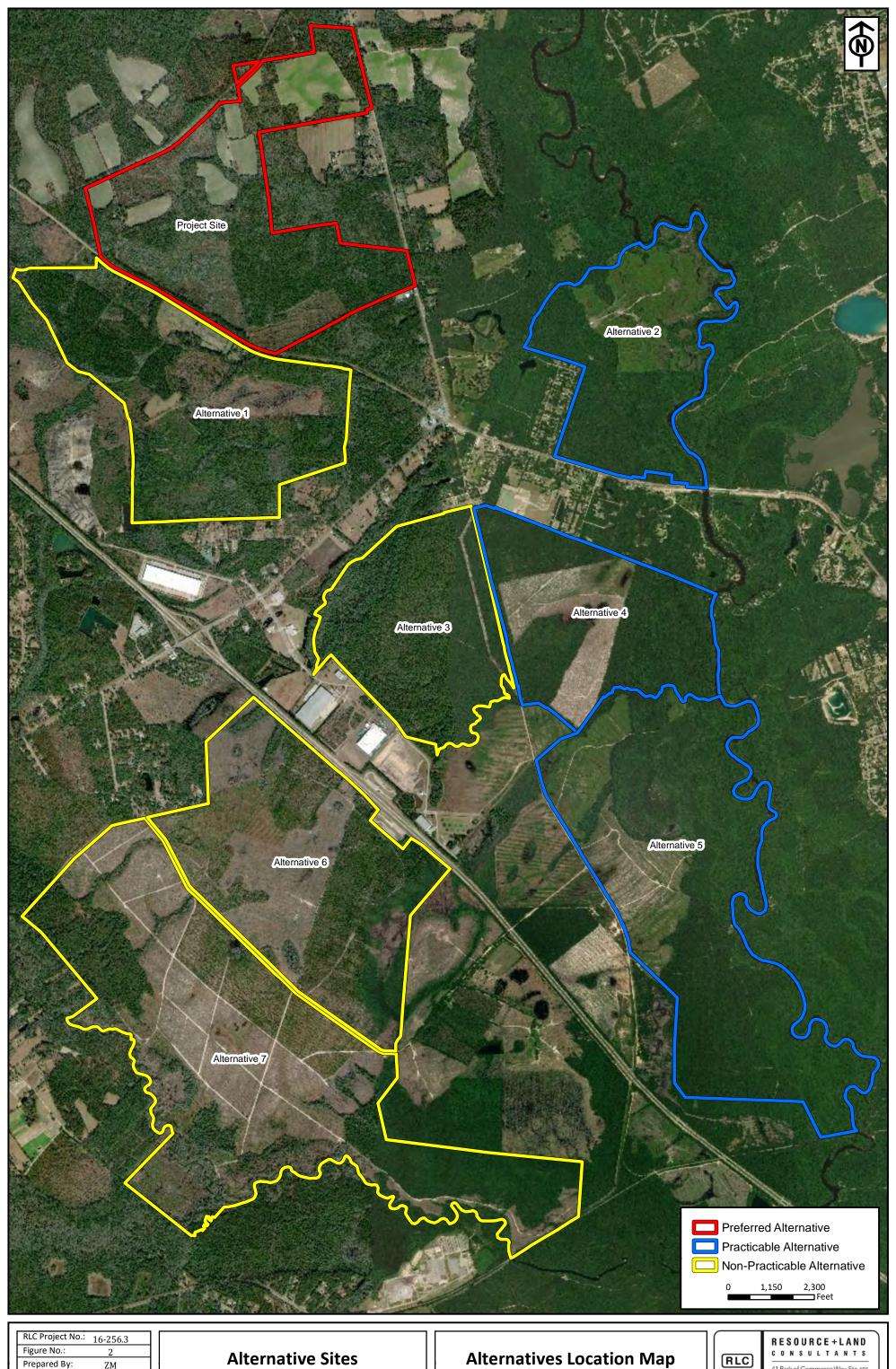
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APPENDIX E: Off-Site Alternatives Information



Y:\2016 Projects\16-256.3 Bryan County Logistics Park Individual Permit\graphics\IP Graphics\Alternative Sites\Figure1_Location.mxd

Source(s): ESRI Basemap, World_Street_Map



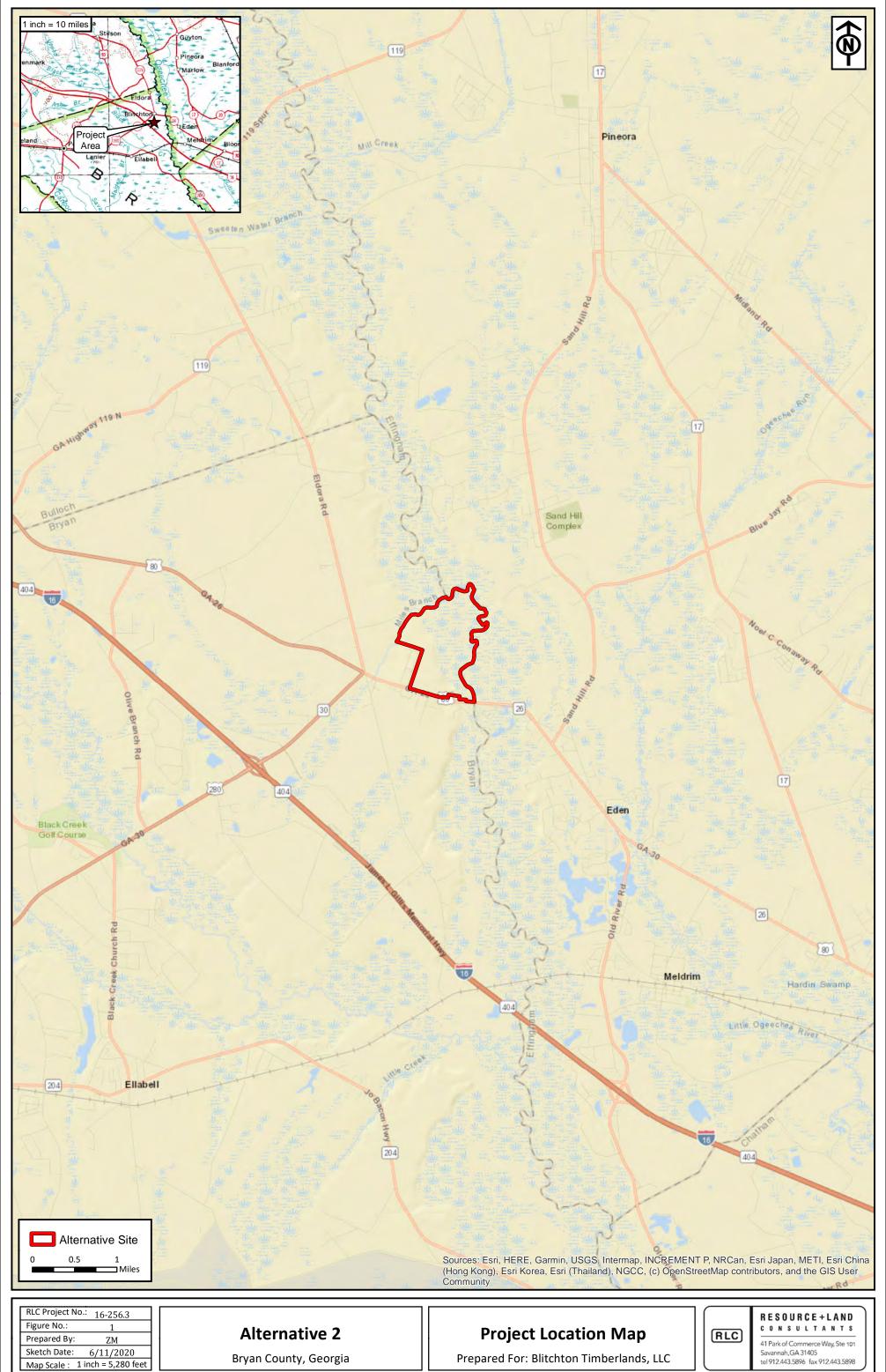
Prepared By: ZM Sketch Date: 6/11/2020 Map Scale: 1 inch = 2,300 feet

Alternative Sites

Bryan County, Georgia

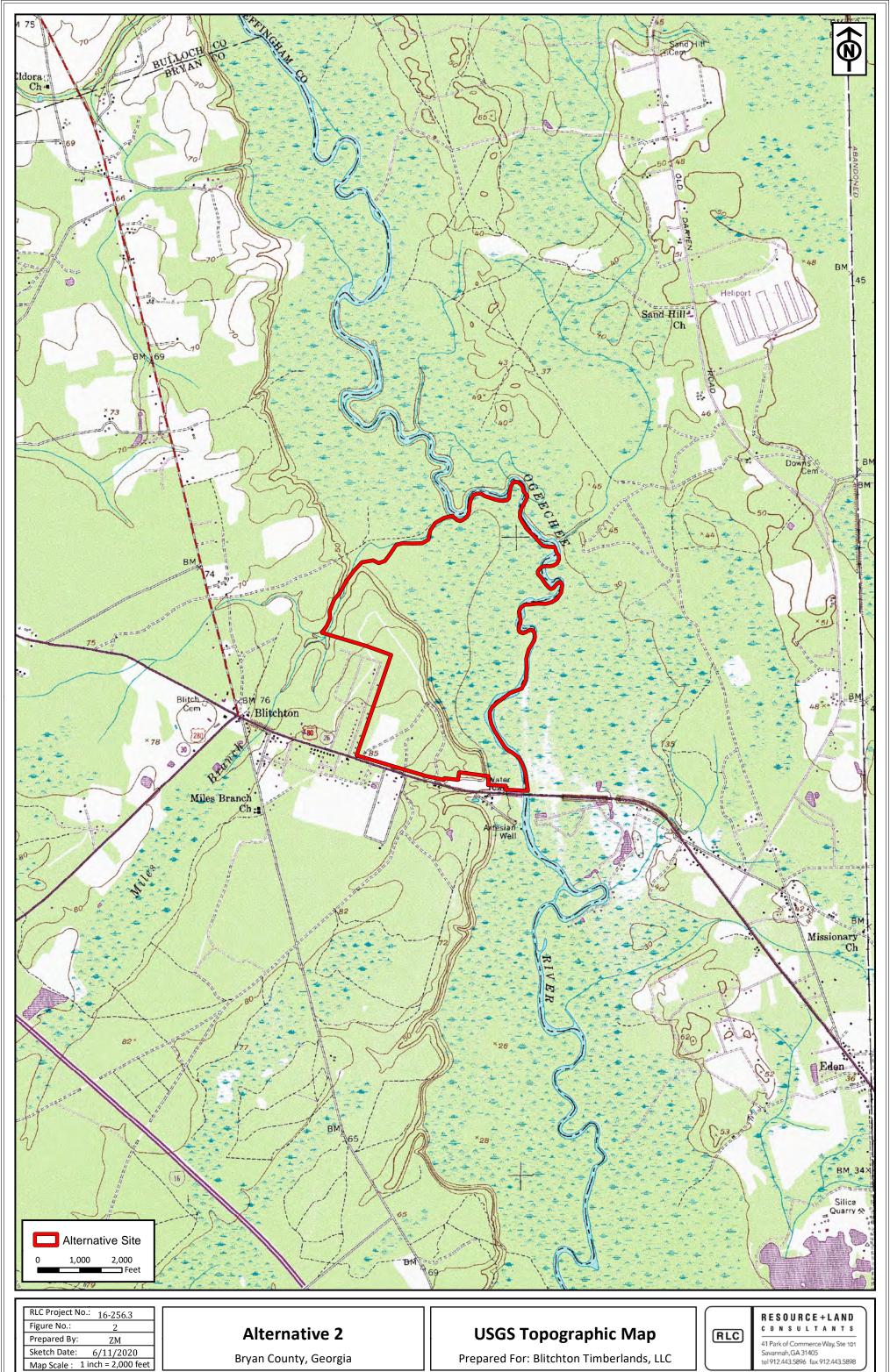
Prepared For: Blitchton Timberlands, LLC

RLC



2016 Projects\16-256.3 Bryan County Logistics Park Individual Permit\graphics\IP Graphics\Alternative Site 2\Figure1_Location.mxd

Prepared For: Blitchton Timberlands, LLC



Y\2016 Projects\16-256.3 Bryan County Logistics Park Individual Permit\graphics\IP Graphics\Alternative Site 2\Figure2_Topo.mxd

Source(s): USGS Topographic Survey Bryan County GA Quadrang

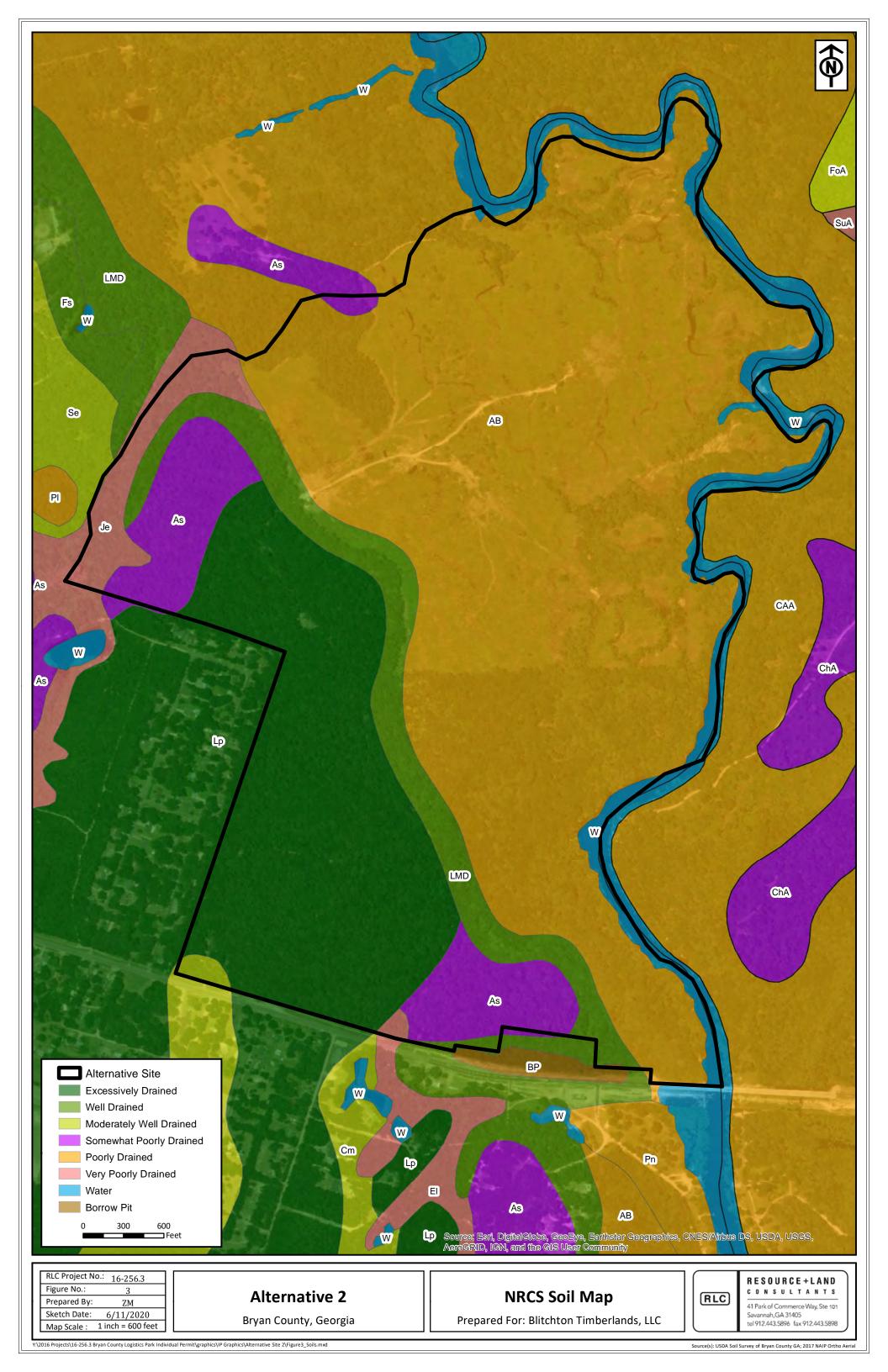






Figure No.: Prepared By: ZM Sketch Date: 6/11/2020 Map Scale: 1 inch = 600 feet

Alternative 2

Bryan County, Georgia

2017 Ortho Aerial

Prepared For: Blitchton Timberlands, LLC



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



RLC Project No.: 16-256.3

Figure No.: 6

Prepared By: ZM

Sketch Date: 6/11/2020

Map Scale: 1 inch = 600 feet

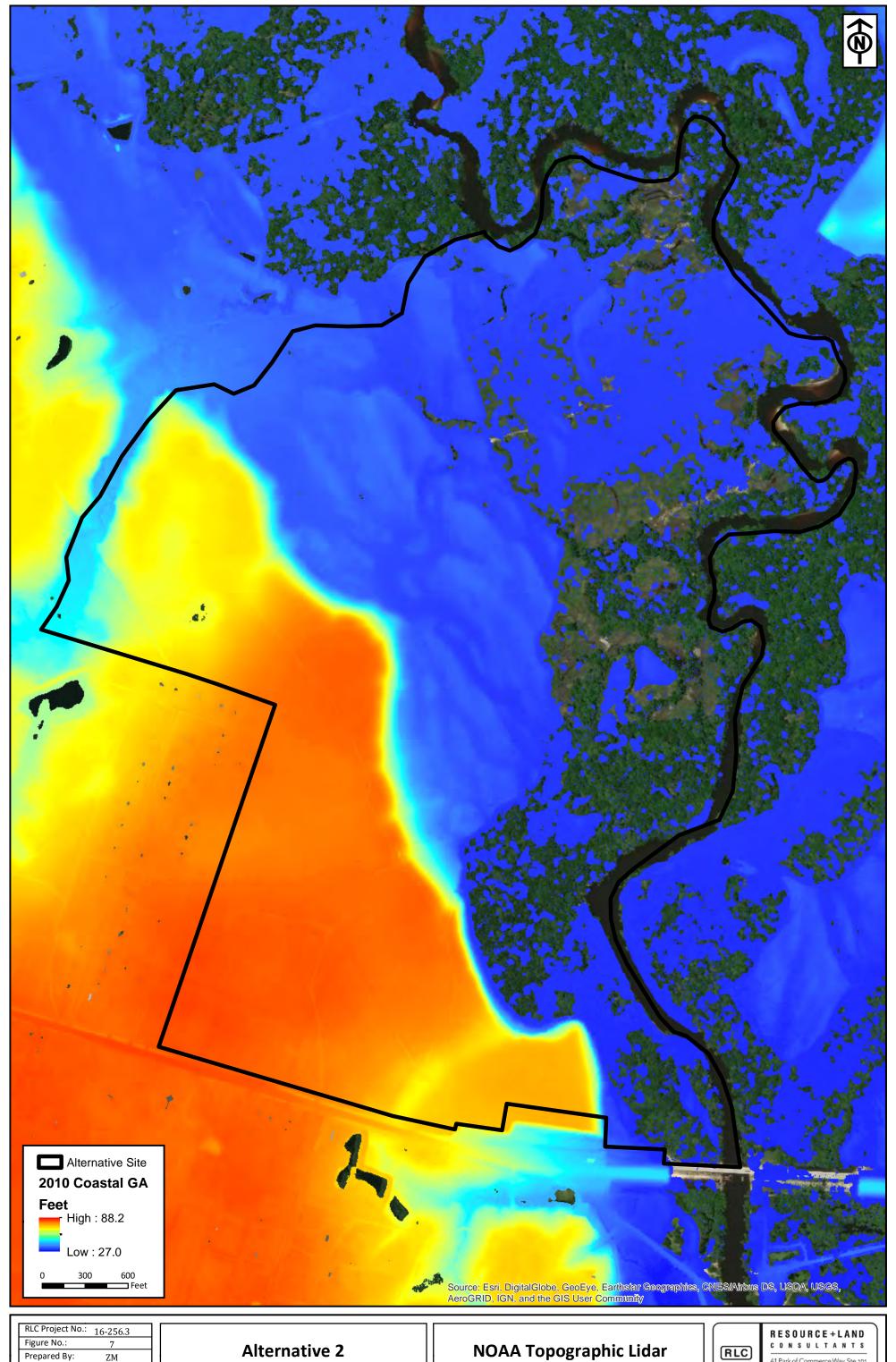
Alternative 2

Bryan County, Georgia

1999 Color-Infrared Imagery

Prepared For: Blitchton Timberlands, LLC

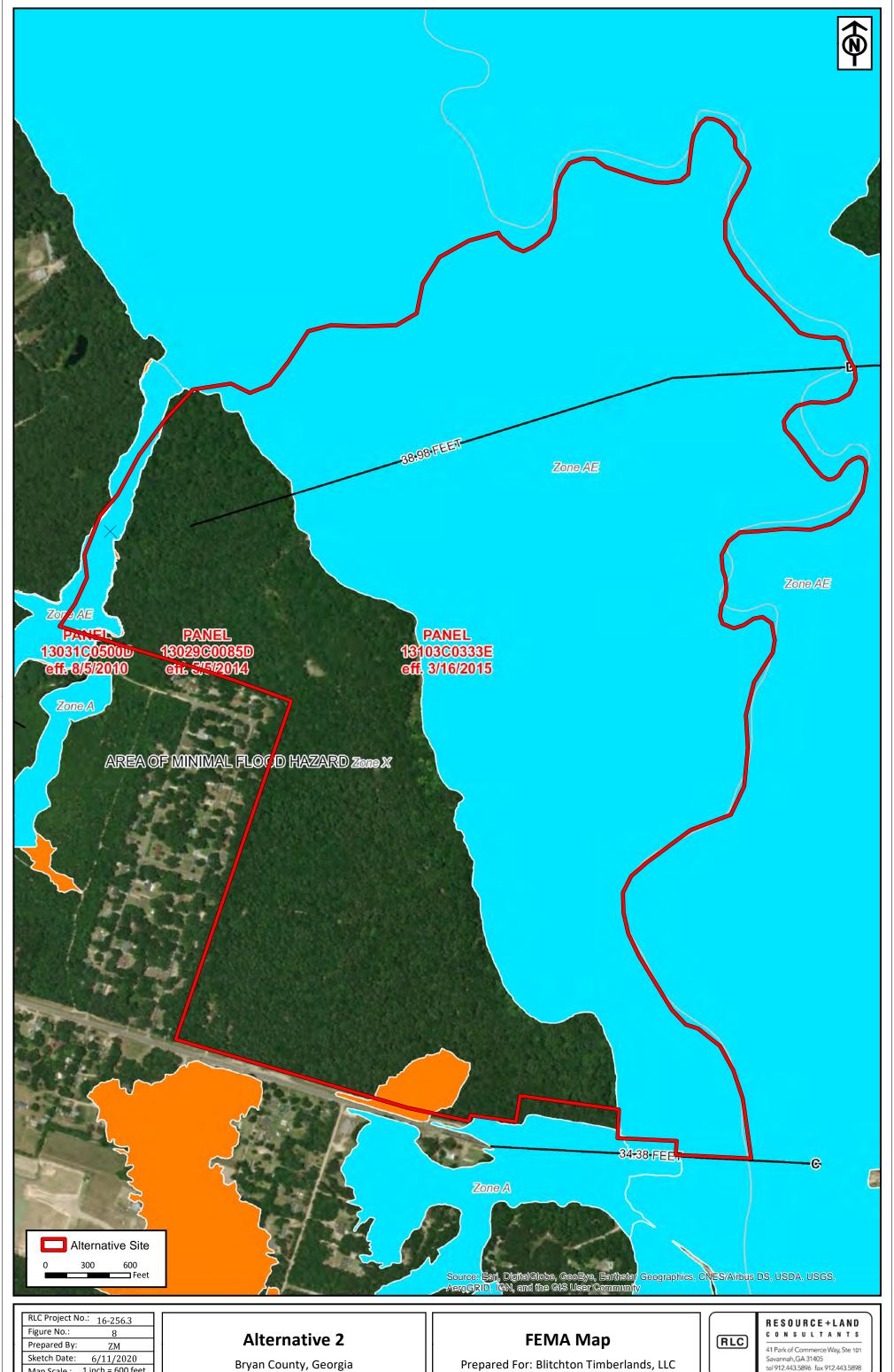




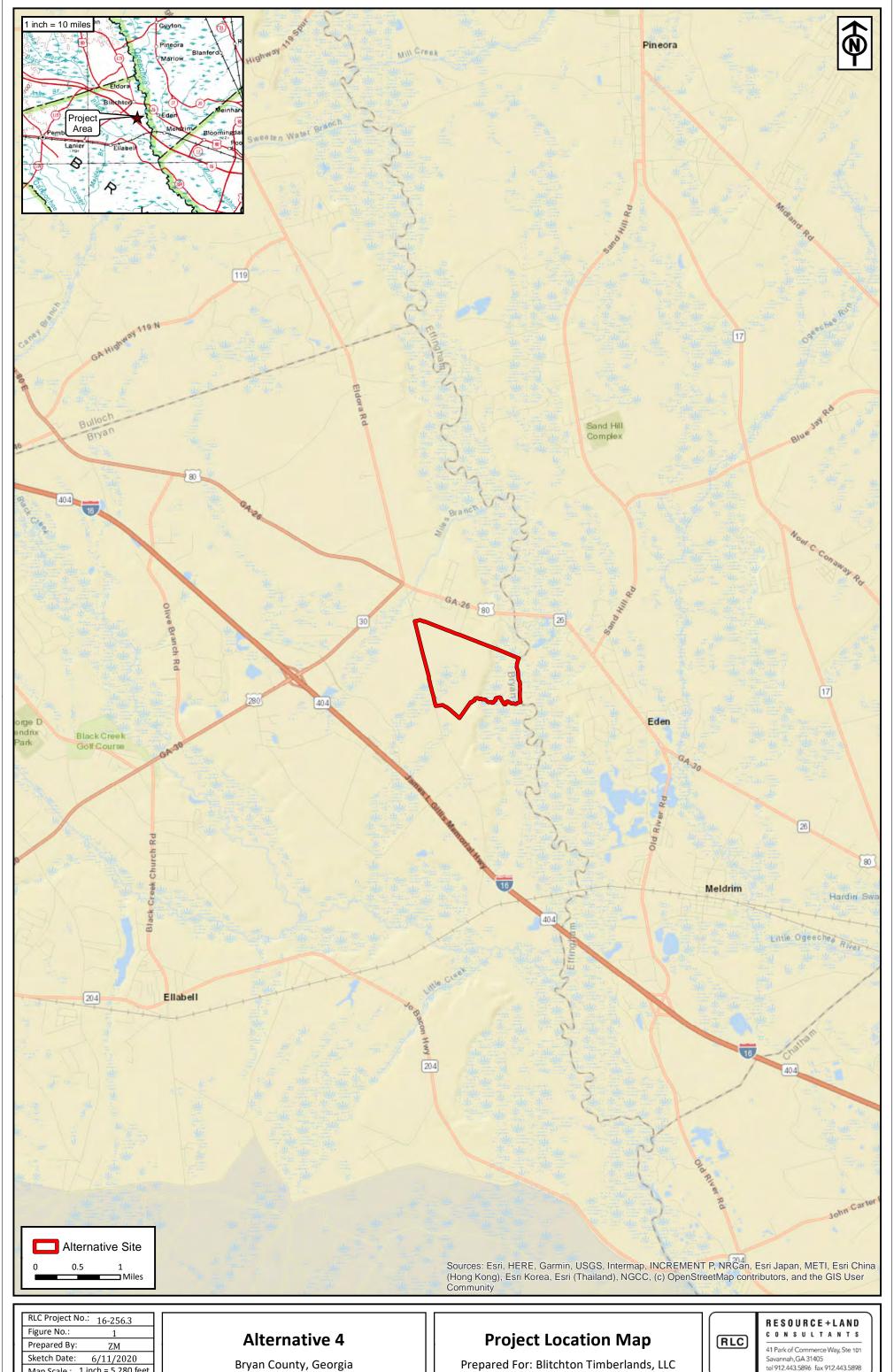
Prepared By: ZM Sketch Date: 6/11/2020 Map Scale: 1 inch = 600 feet

Alternative 2 Bryan County, Georgia

Prepared For: Blitchton Timberlands, LLC

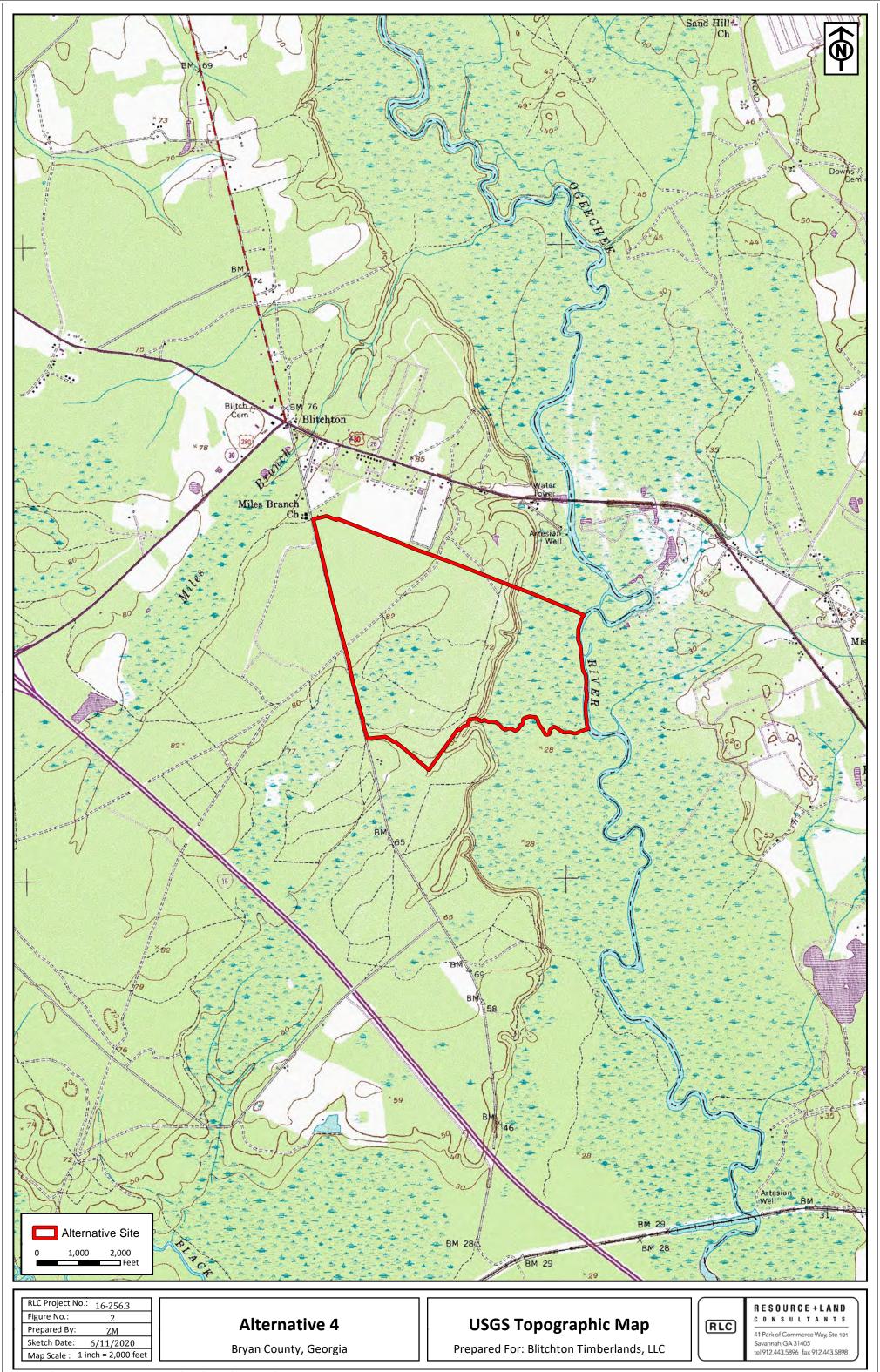


Map Scale: 1 inch = 600 feet \2016 Projects\16-256.3 Bryan County Logistics Park Individual Permit\graphics\IP Graphics\Alternative Site 2\Figure8_FEMA.mxd Prepared For: Blitchton Timberlands, LLC



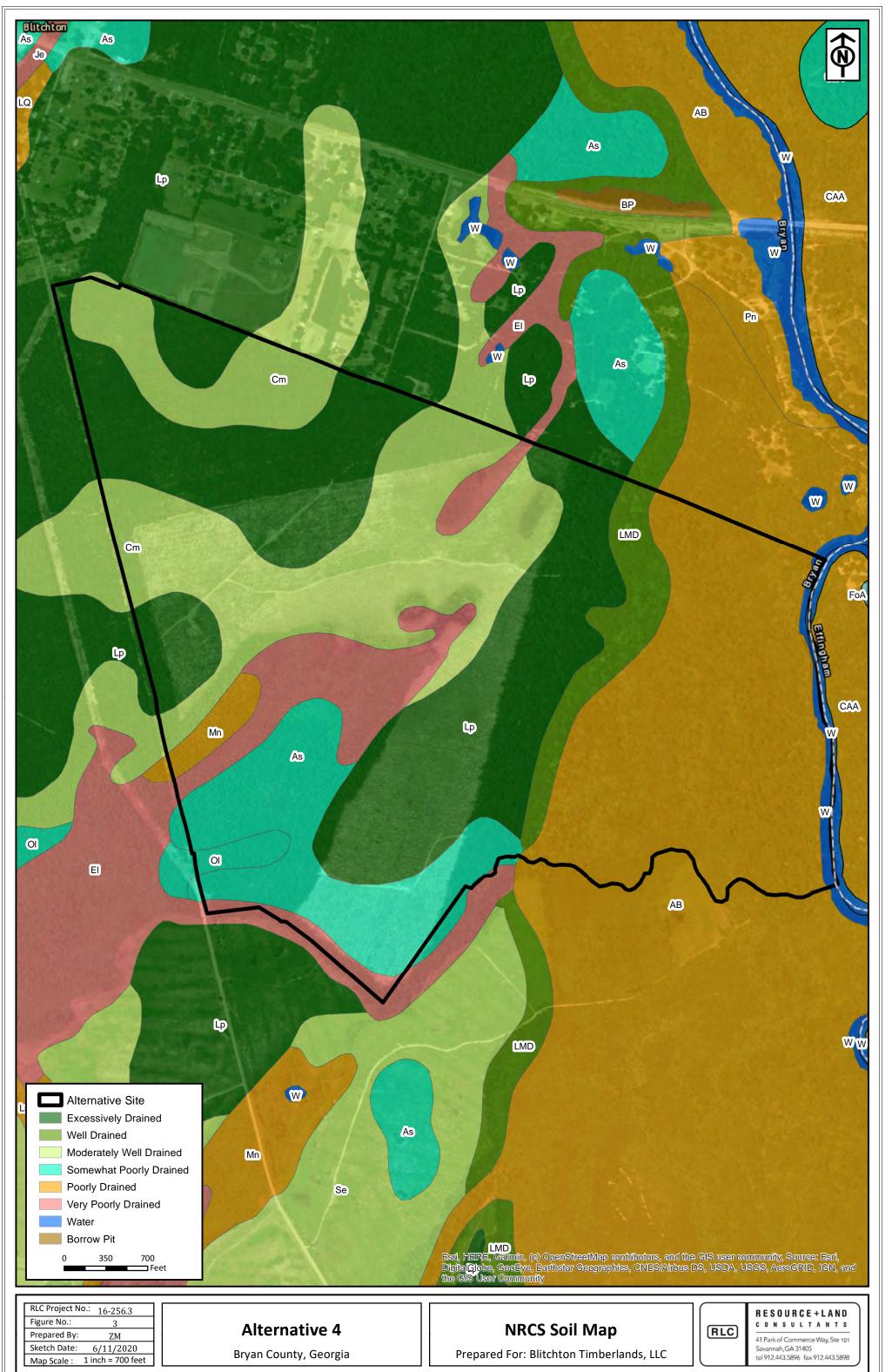
Map Scale: 1 inch = 5,280 feet \2016 Projects\16-256.3 Bryan County Logistics Park Individual Permit\graphics\IP Graphics\Alternative Site 4\Figure1_Location.mxd Prepared For: Blitchton Timberlands, LLC

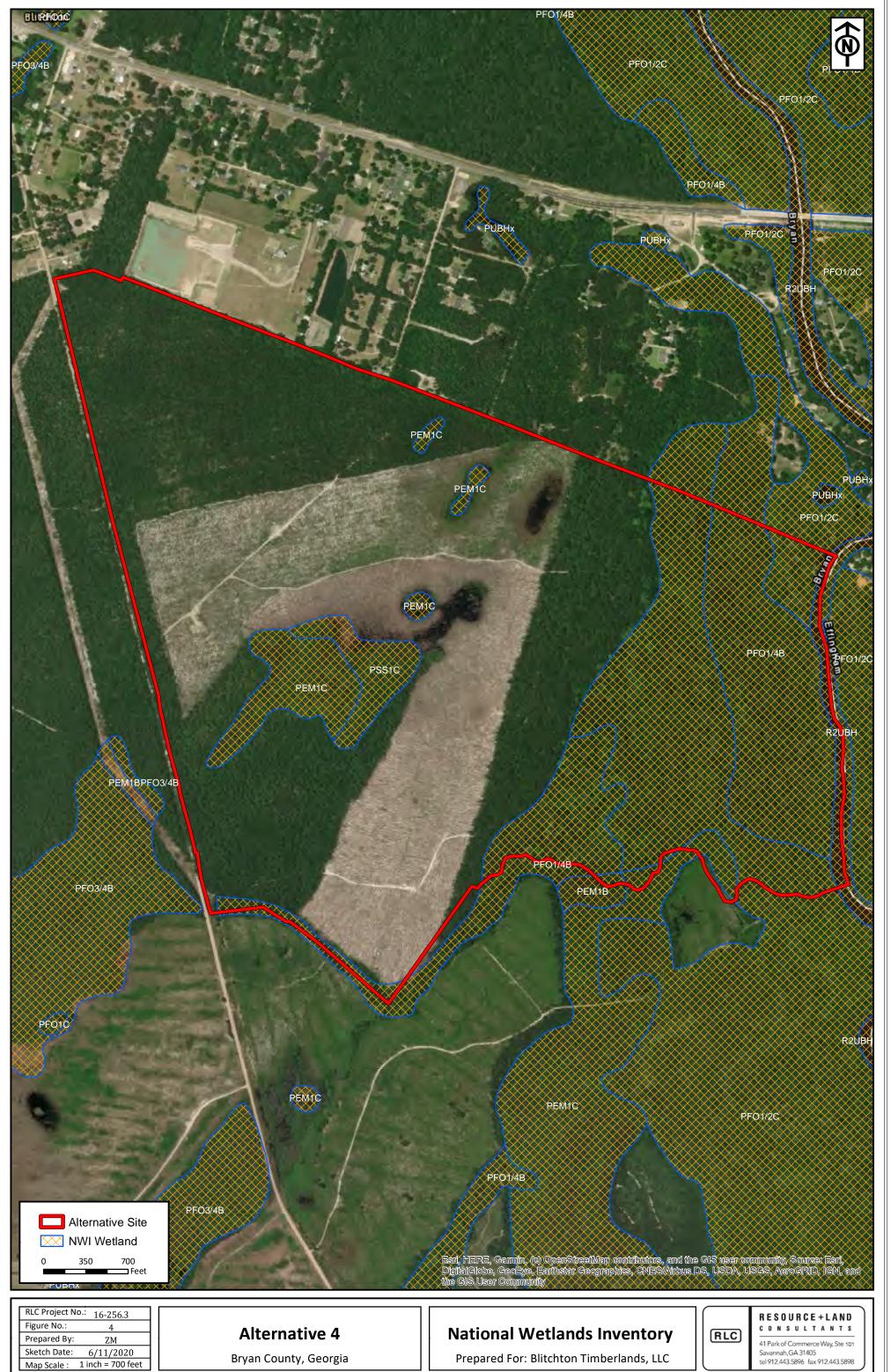




\2016 Projects\16-256.3 Bryan County Logistics Park Individual Permit\graphics\IP Graphics\Alternative Site 4\Figure2_Topo.mxd

Source(s): USGS Topographic Survey Bryan County GA Quadrang





Y:\2016 Projects\16-256.3 Bryan County Logistics Park Individual Permit\graphics\IP Graphics\Alternative Site 4\Figure4_NWI.mxd



Figure No.: Prepared By: ZM Sketch Date: 6/11/2020 Map Scale: 1 inch = 700 feet

Alternative 4

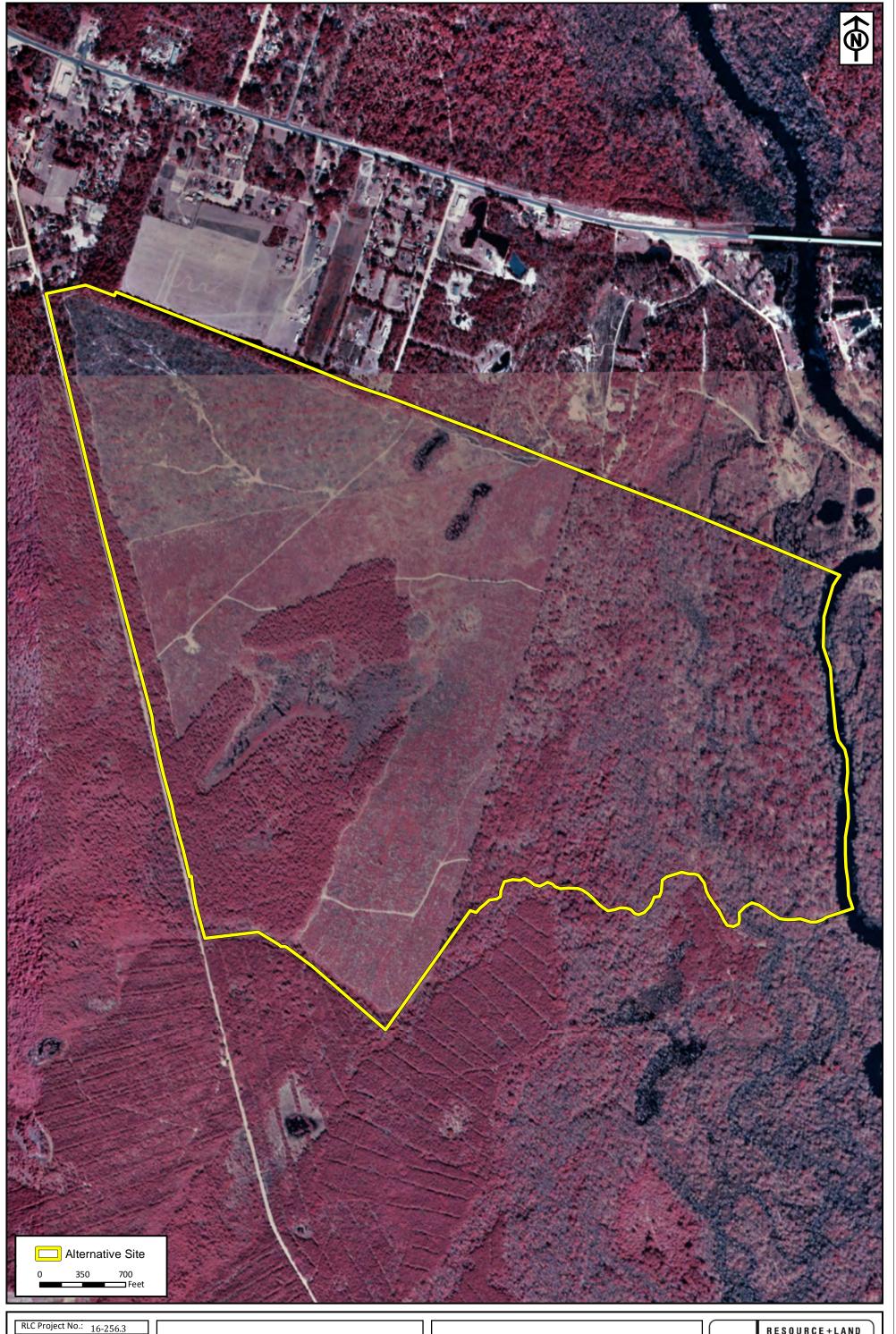
Bryan County, Georgia

2017 Ortho Aerial

Prepared For: Blitchton Timberlands, LLC



C O N S U L T A N T S



 RLC Project No.:
 16-256.3

 Figure No.:
 6

 Prepared By:
 ZM

 Sketch Date:
 6/11/2020

 Map Scale:
 1 inch = 700 feet

Alternative 4

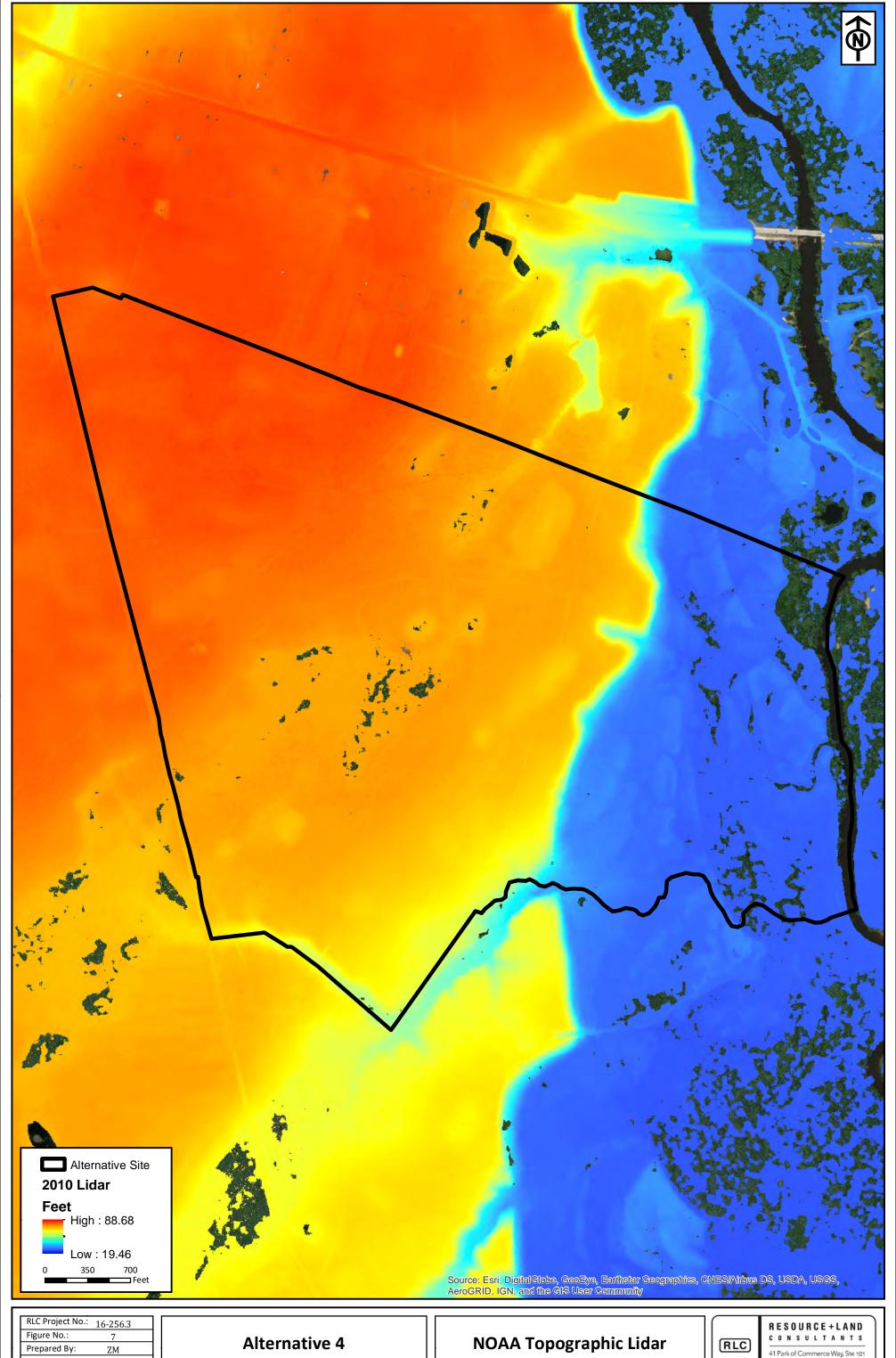
Bryan County, Georgia

1999 Color-Infrared Imagery

Prepared For: Blitchton Timberlands, LLC

RLC

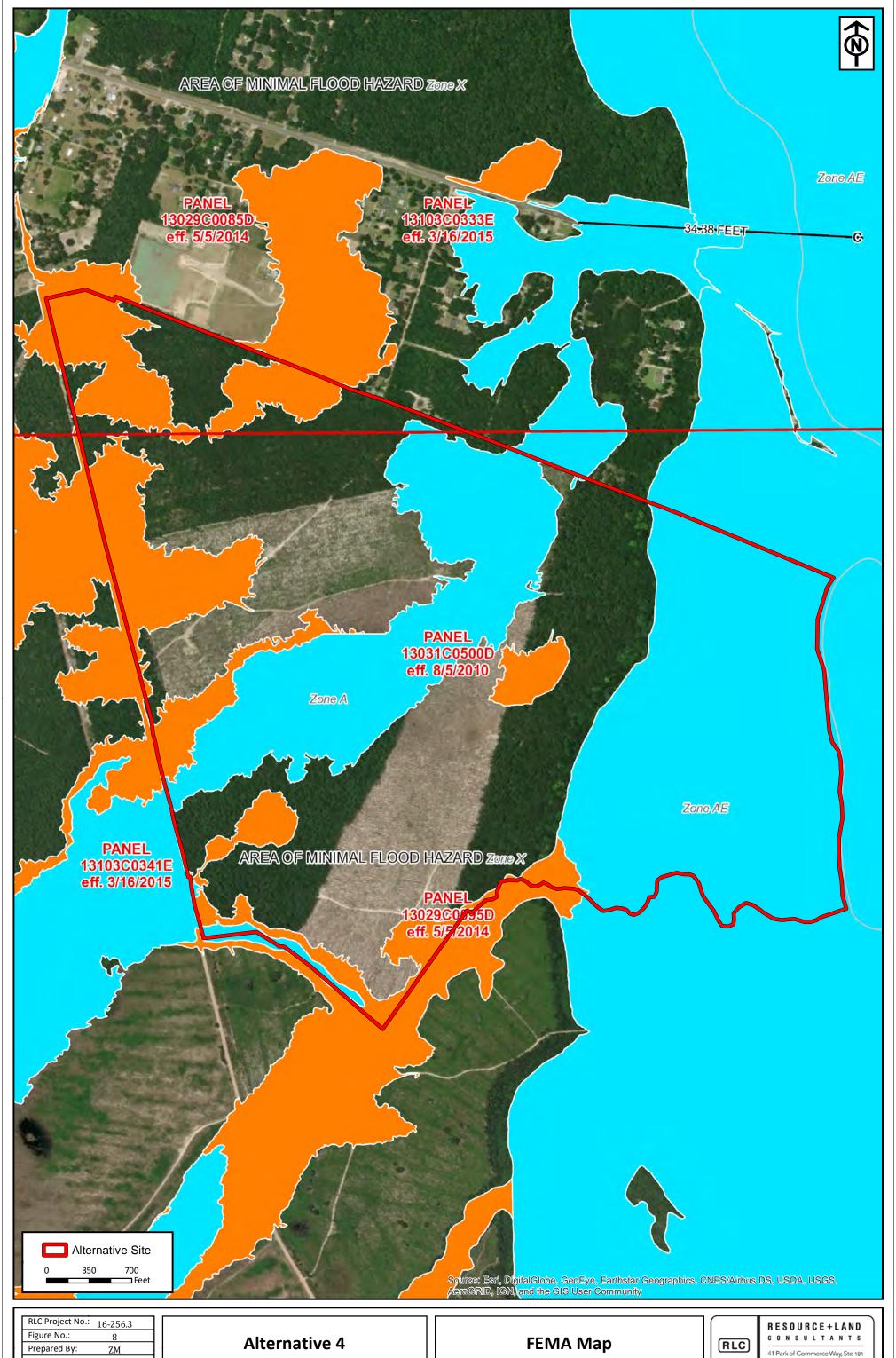
RESOURCE+LAND C O N S U L T A N T S



Sketch Date: 6/11/2020 Map Scale: 1 inch = 700 feet

Bryan County, Georgia

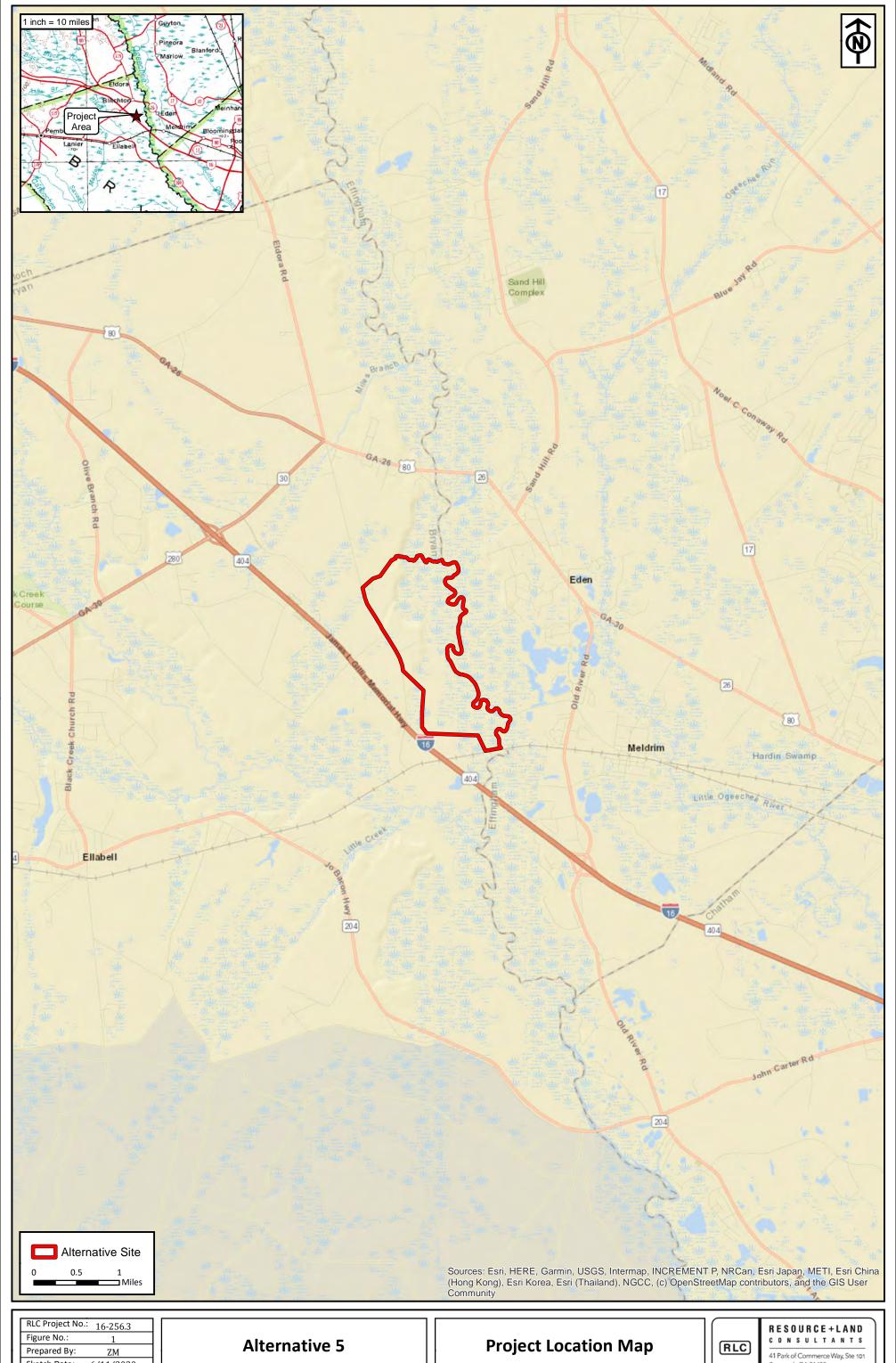
Prepared For: Blitchton Timberlands, LLC



Sketch Date: 6/11/2020 Map Scale: 1 inch = 700 feet

Bryan County, Georgia

Prepared For: Blitchton Timberlands, LLC

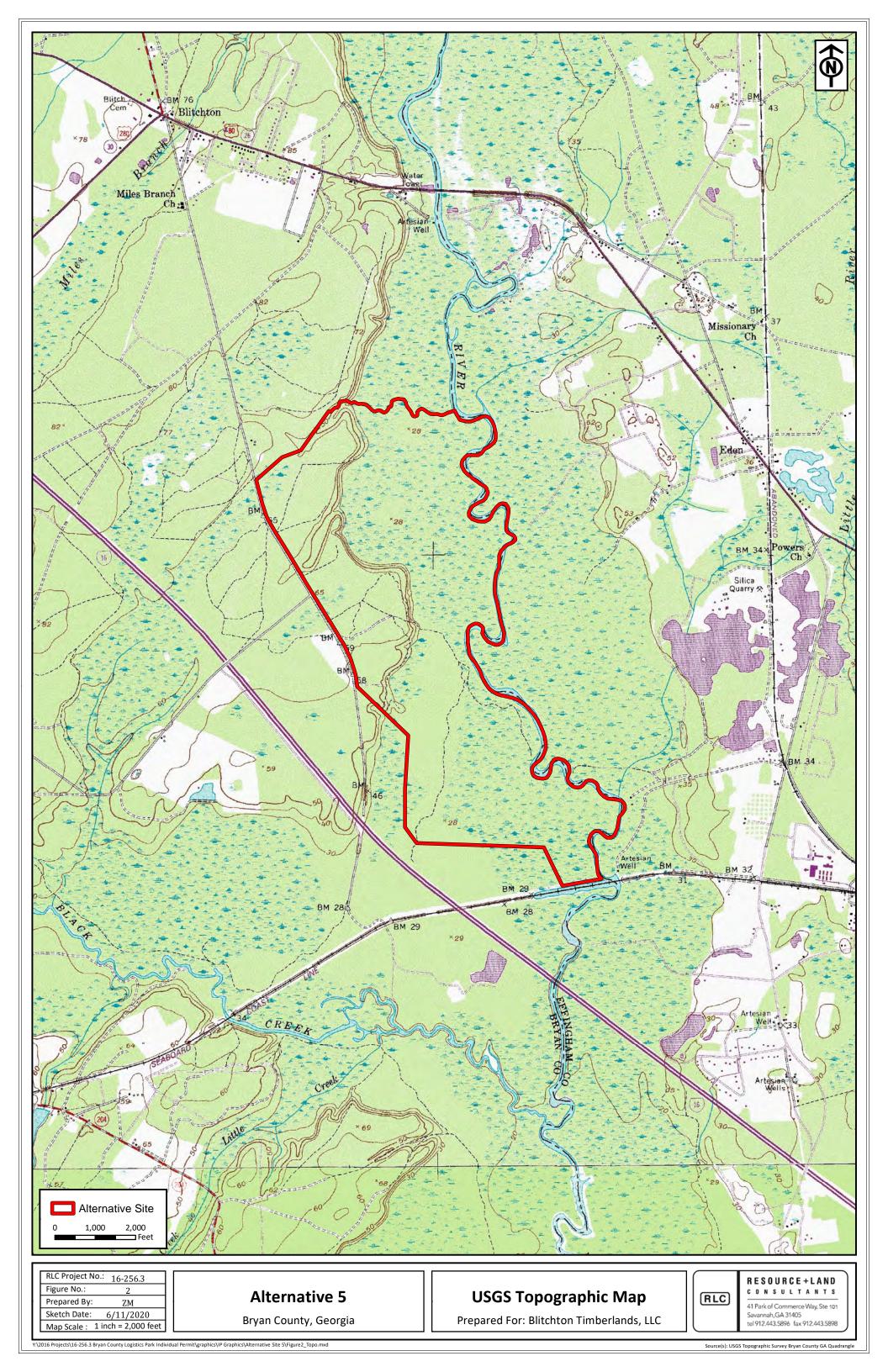


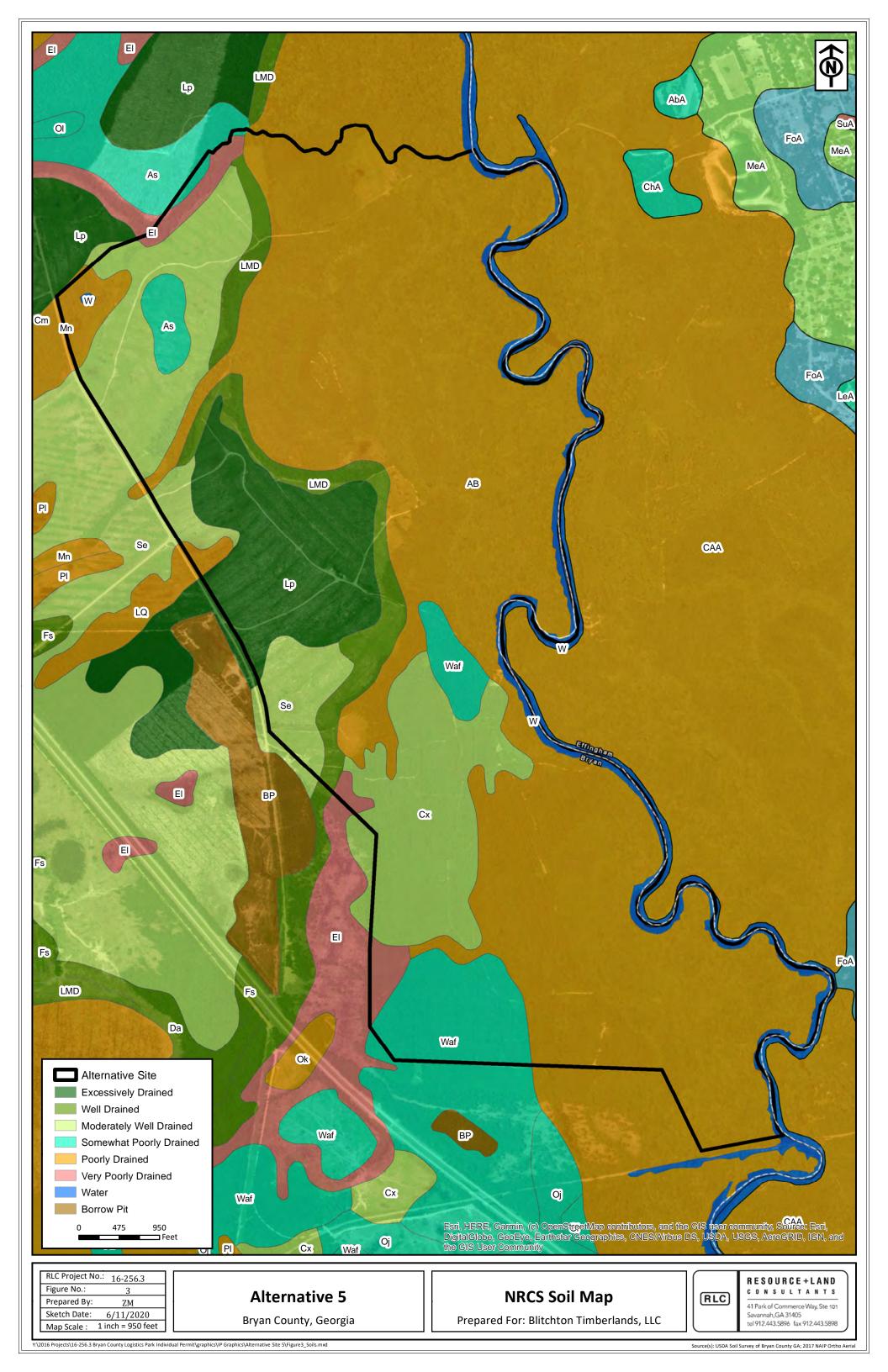
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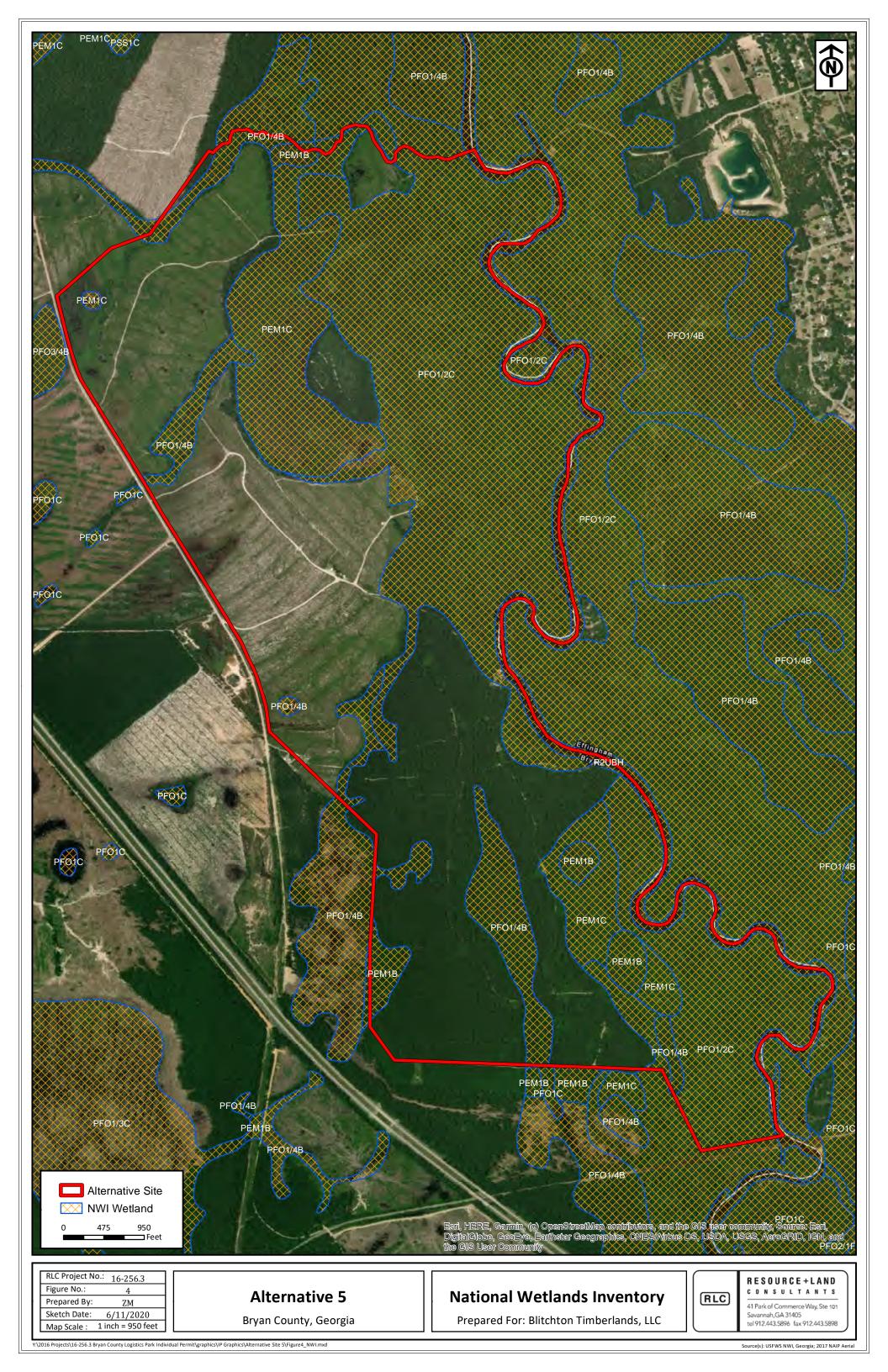
Prepared For: Blitchton Timberlands, LLC

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

Bryan County, Georgia









Prepared By: ZM Sketch Date: 6/11/2020 Map Scale: 1 inch = 950 feet

Alternative 5 Bryan County, Georgia **2017 Ortho Aerial**

Prepared For: Blitchton Timberlands, LLC

RLC

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

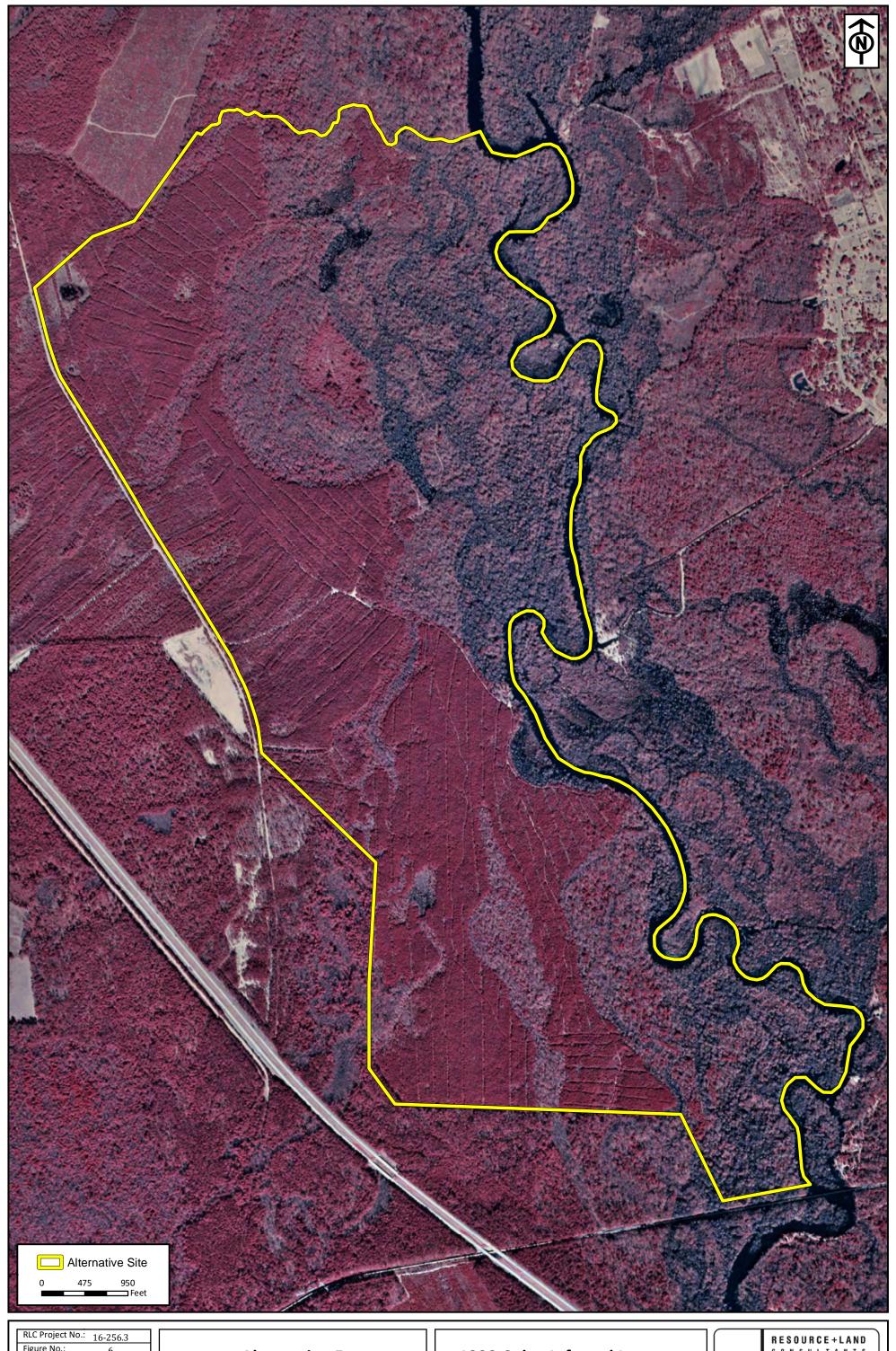


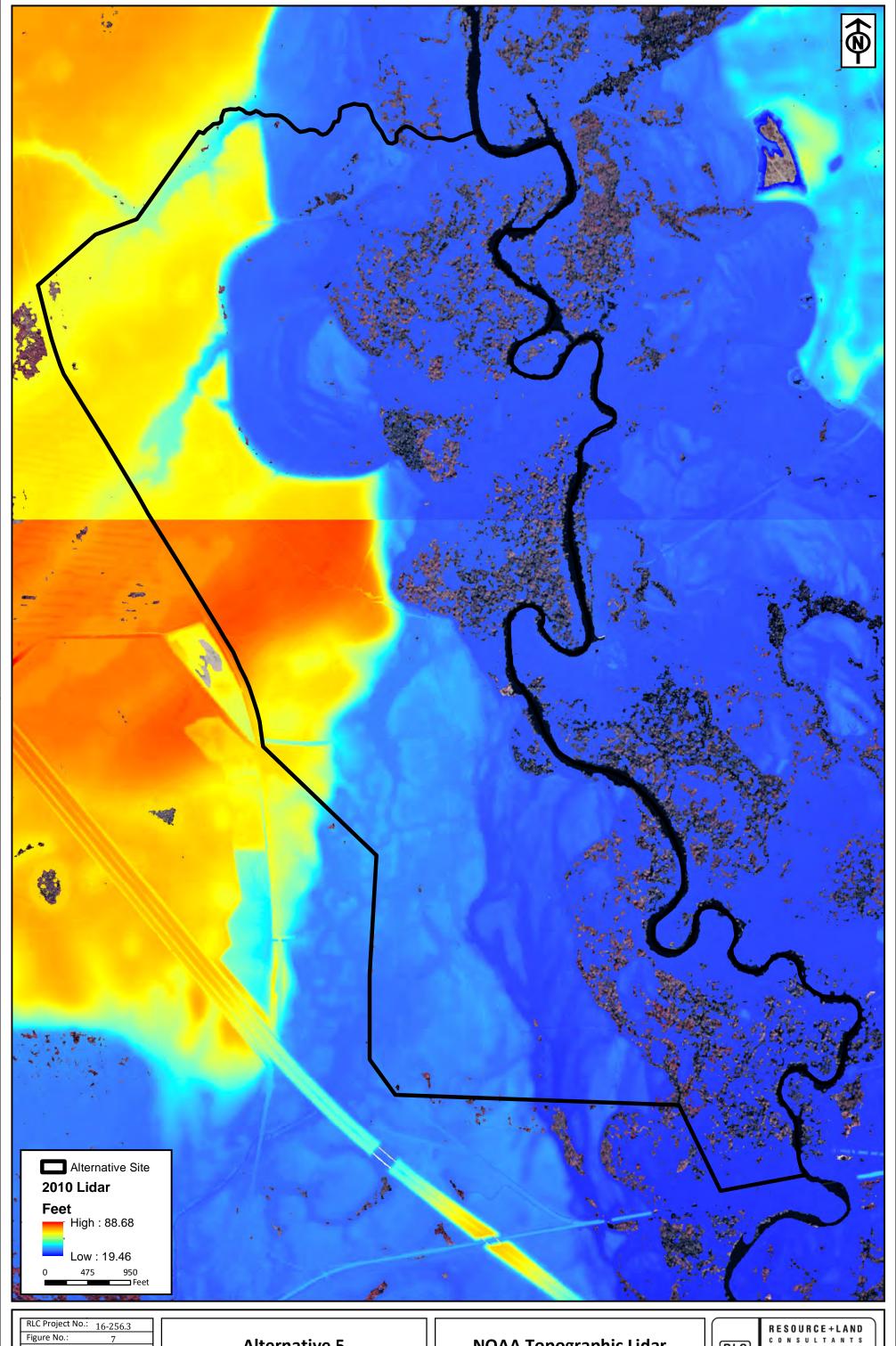
Figure No.: Prepared By: ZM Sketch Date: 6/11/2020 Map Scale: 1 inch = 950 feet

Alternative 5 Bryan County, Georgia 1999 Color-Infrared Imagery

Prepared For: Blitchton Timberlands, LLC

RLC

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



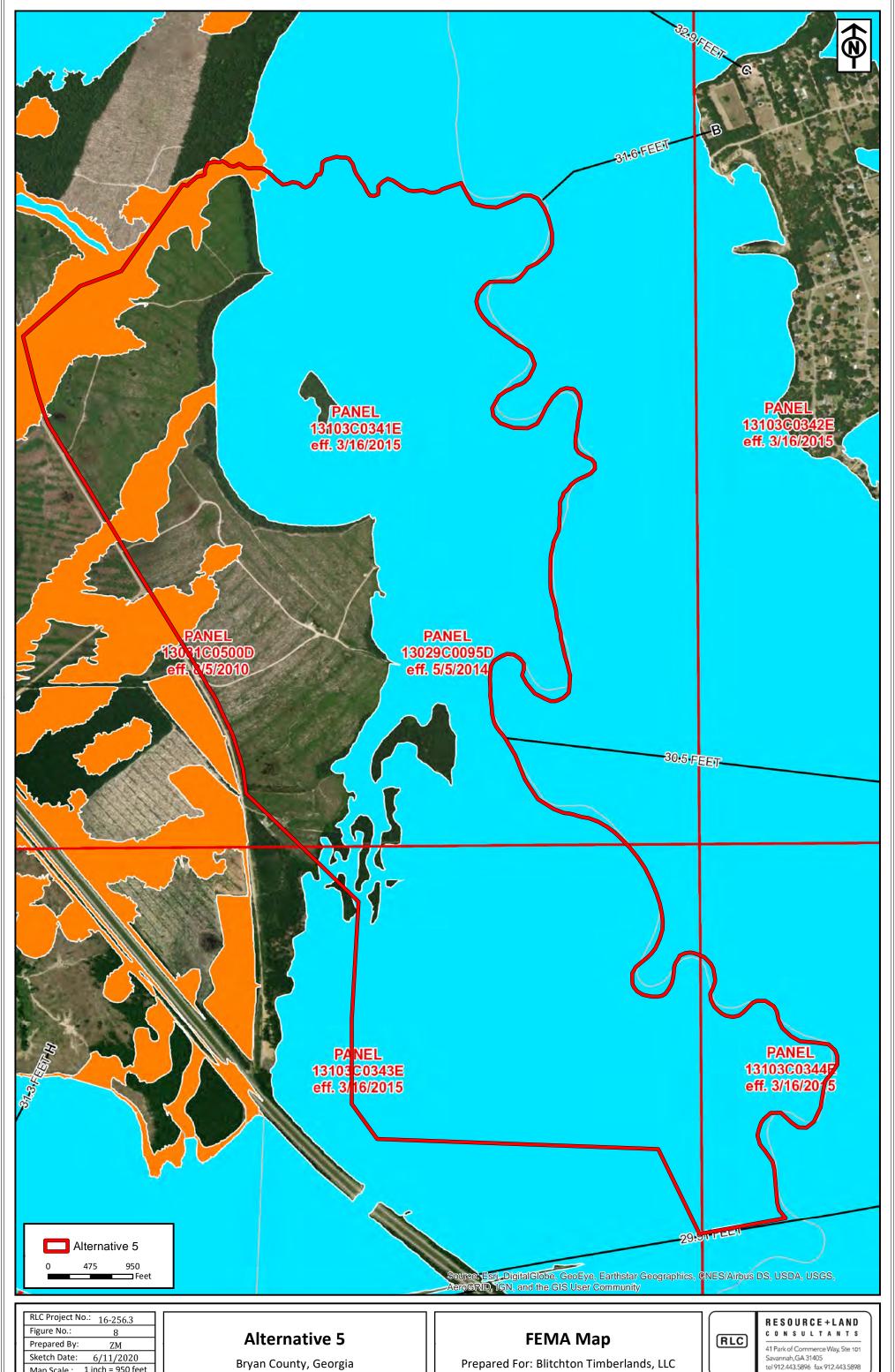
Prepared By: ZM Sketch Date: 6/11/2020 Map Scale: 1 inch = 950 feet

Alternative 5 Bryan County, Georgia **NOAA Topographic Lidar**

Prepared For: Blitchton Timberlands, LLC

RLC

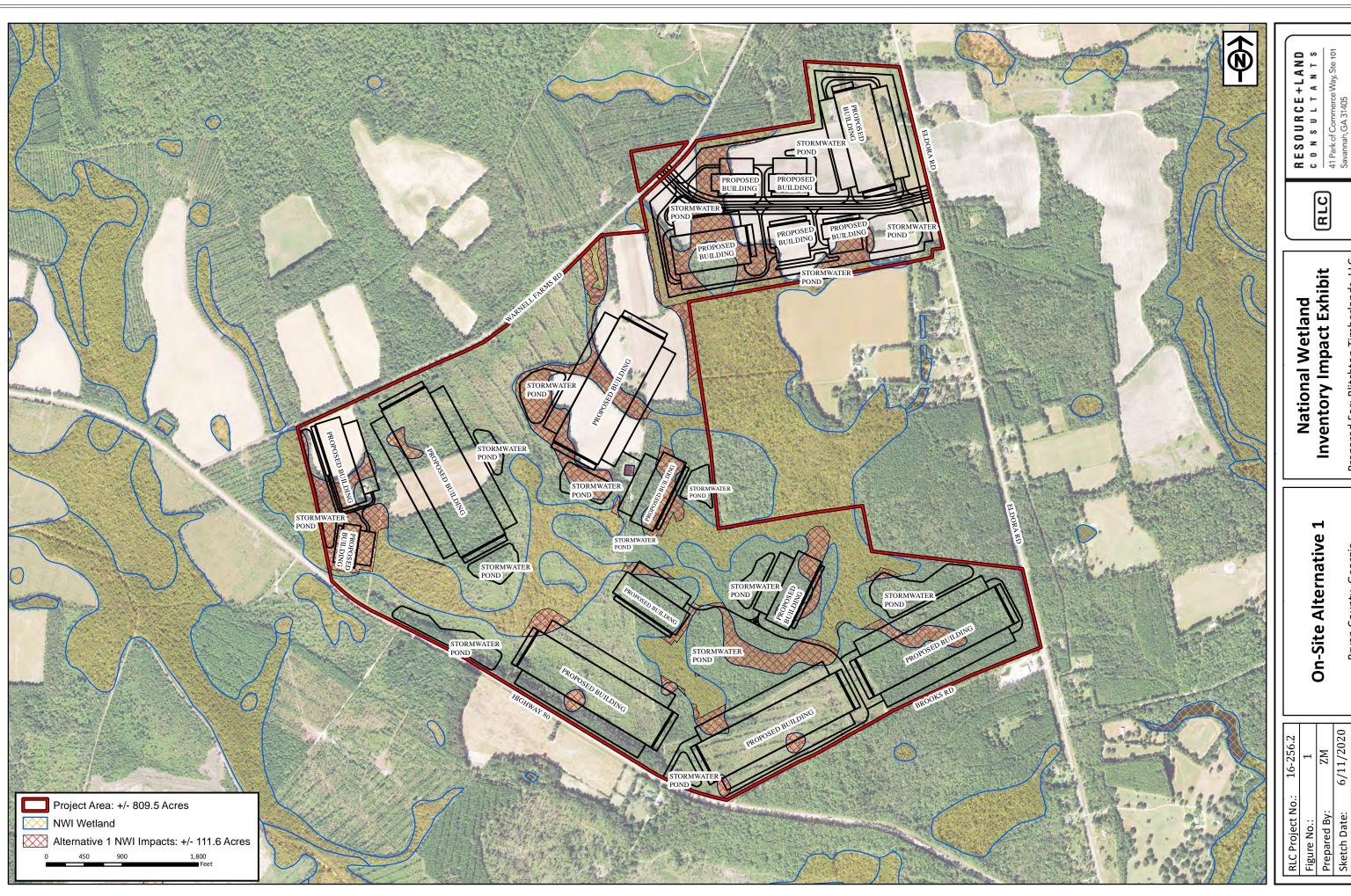
RESOURCE+LAND C O N S U L T A N T S 41 Park of Commerce Way, Ste 101 Savannah, GA 31405 tel 912.443.5896 fax 912.443.5898



Sketch Date: 6/11/2020 Map Scale: 1 inch = 950 feet

Prepared For: Blitchton Timberlands, LLC

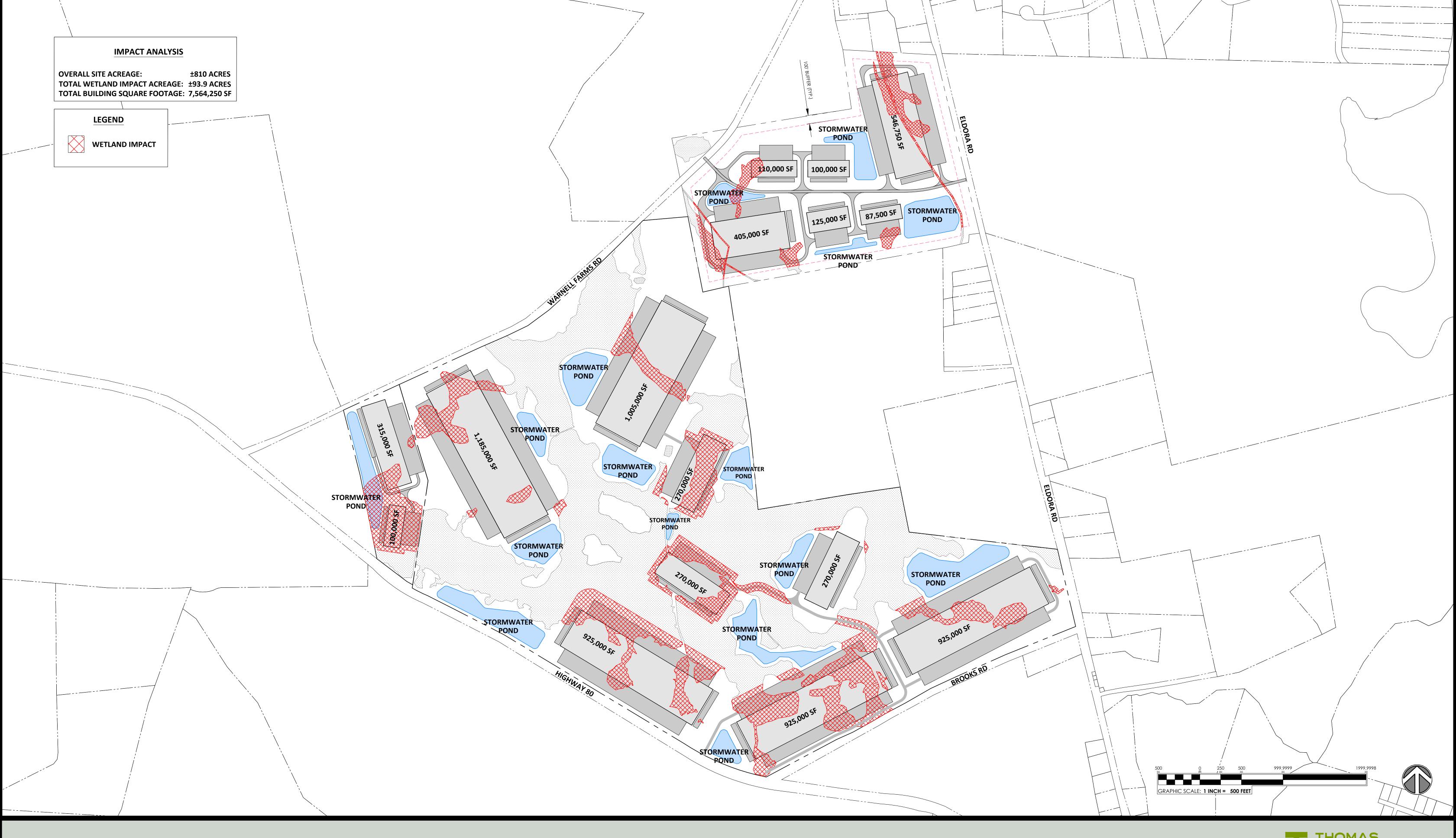
APPENDIX F:
On-Site Configurations
<u></u>



National Wetland Inventory Impact Exhibit

Prepared For: Blitchton Timberlands, LLC

Bryan County, Georgia



ALTERNATE SITE #1 EXHIBIT - WETLAND IMPACTS

BRYAN COUNTY LOGISTICS CENTER

BRYAN COUNTY / GA

MAY 21, 2020

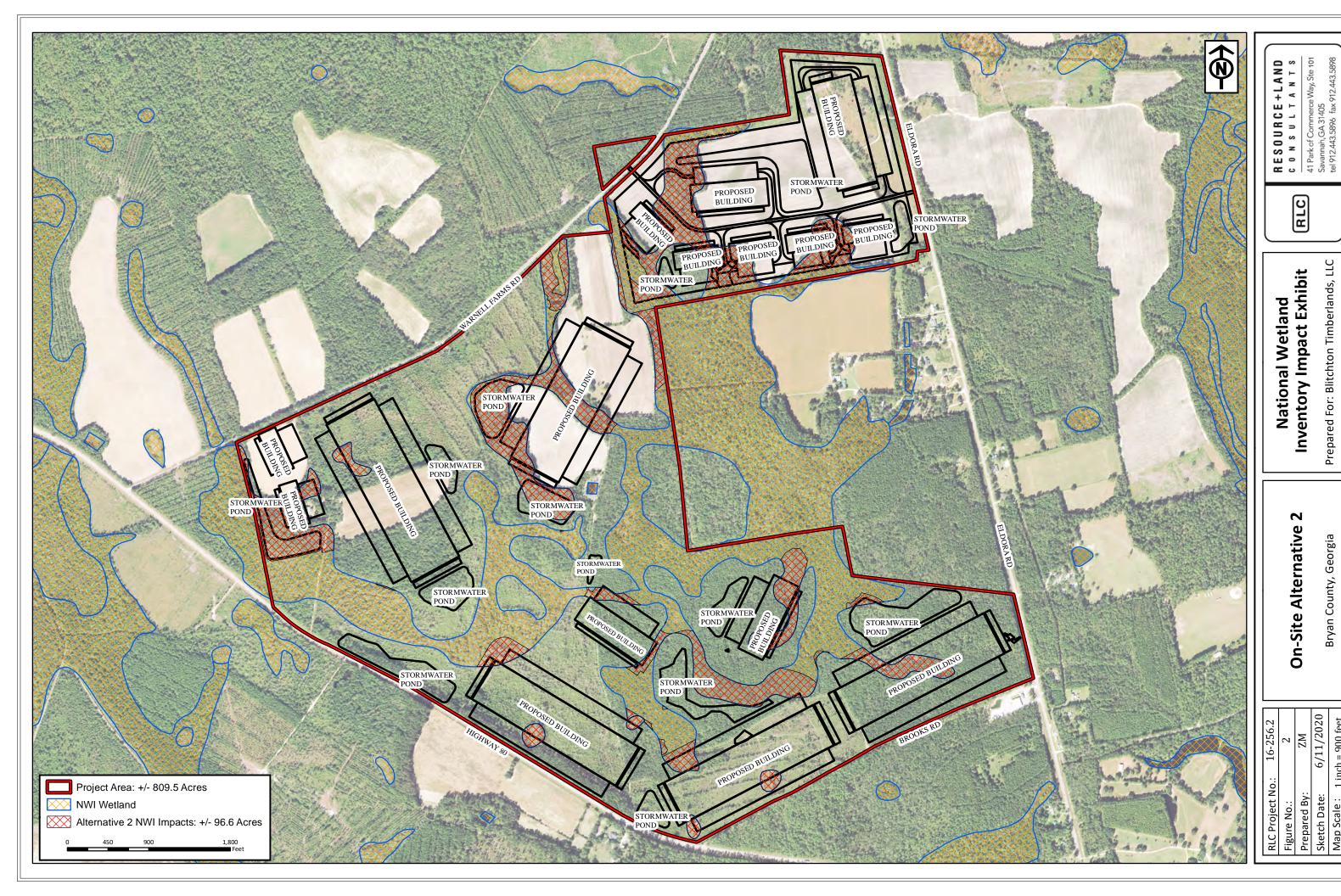


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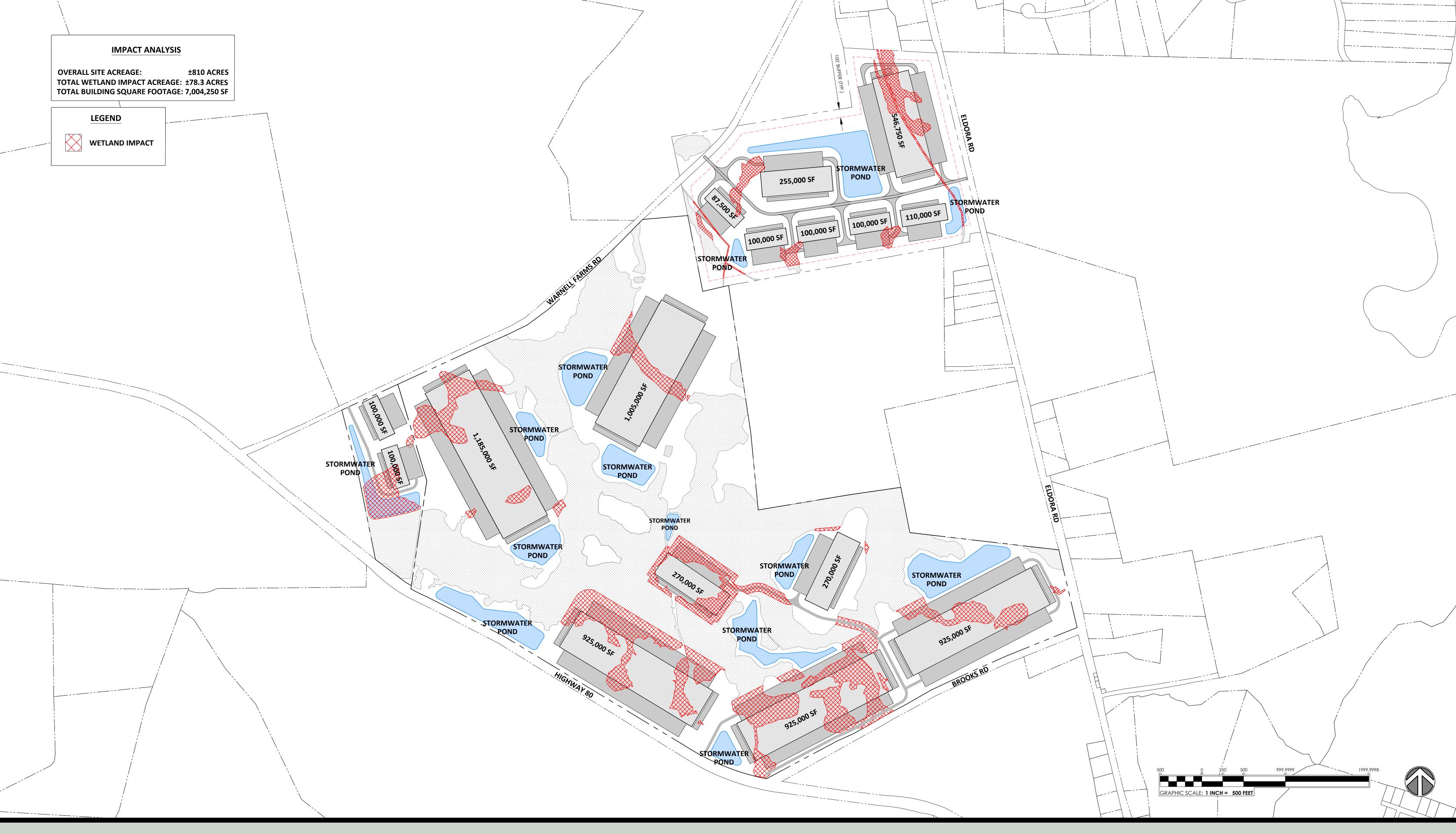
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Scale: 1 inch = 900 feet



ALTERNATE SITE #2 EXHIBIT - WETLAND IMPACTS

BRYAN COUNTY LOGISTICS CENTER

BRYAN COUNTY / GA

MAY 21, 2020

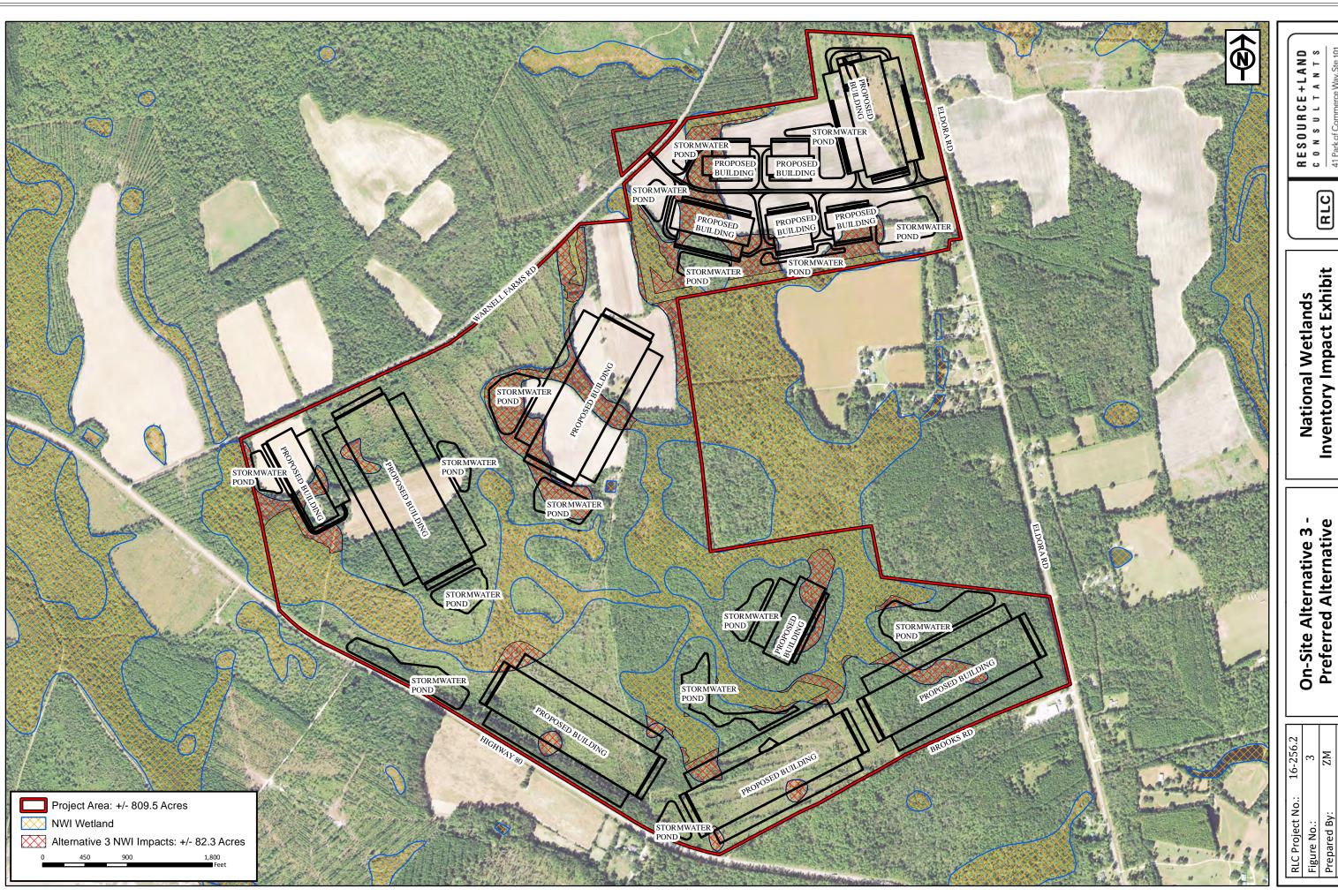


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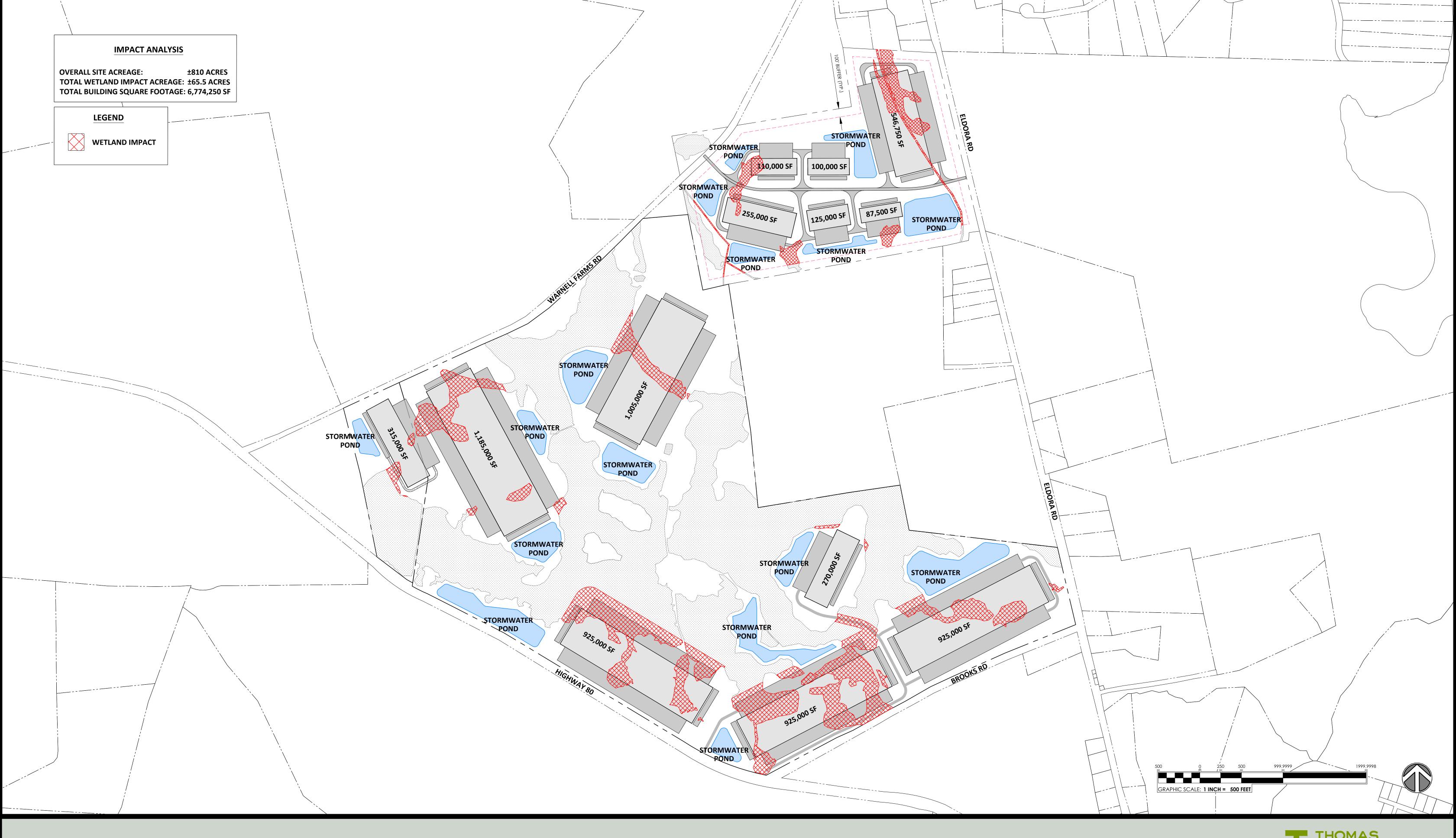


National Wetlands Inventory Impact Exhibit

RLC

Prepared For: Blitchton Timberlands, LLC

Bryan County, Georgia



ALTERNATE SITE #3 EXHIBIT - WETLAND IMPACTS

BRYAN COUNTY LOGISTICS CENTER

BRYAN COUNTY / GA

MAY 21, 2020



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