



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

March 13, 2024

Regulatory Division  
SAS-2024-00250

**JOINT PUBLIC NOTICE**  
**Savannah District/State of Georgia**

The Savannah District has received a request to modify 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-2024-00250

Applicant: Mr. Marc Pflaging  
Scannell Properties #732, LLC  
8801 River Crossing Boulevard, Suite 300  
Indianapolis, Indiana 46240

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

Location of Proposed Work: The project site is located within the Rockingham Farms Industrial Park, adjacent to and north of Veterans Parkway within Savannah, Chatham County, Georgia (32.0133, -81.1883)

Description of Work Subject to the Jurisdiction of the U.S. Army Corps of Engineers:  
To impact 0.798 acre of manmade ditch to facilitate construction of two logistics buildings totaling 1,309,800 square. The proposed project generally includes construction of site access, parking, buildings, and stormwater management facilities. The proposed site plan includes site access to/from Veterans Parkway via the newly constructed Warehouse Road within the existing industrial park. One building would be constructed totaling approximately 608,400 and a second building would total 701,400 square feet. Two ponds designed to satisfy the stormwater management needs of the site are positioned at various locations along the perimeter of the buildings and parking area. The proposed project would not impact a special aquatic site; therefore the applicant contends that no compensatory mitigation is required for the project.

## **BACKGROUND**

This Joint Public Notice announces a request for authorizations from both the Corps and the State of Georgia. The applicant's proposed work may also require local governmental approval.

## **STATE OF GEORGIA**

Water Quality Certification: The Georgia Department of Natural Resources, Environmental Protection Division will review the proposed project for water quality certification, in accordance with the provisions of Section 401 of the Clean Water Act. Prior to issuance of a Department of the Army permit for a project location in, on, or adjacent to the waters of the State of Georgia, review for Water Quality Certification is required. A reasonable period of time, which shall not exceed one year, is established under the Clean Water Act for the State to act on a request for Water Quality Certification, after which, issuance of such a Department of the Army permit may proceed. The applicant did not request a pre-certification meeting with Georgia EPD prior to submitting their application for a permit under Section 404 of the Clean Water Act. The applicant must still request a meeting with EPD at least 30 days prior to any request they make for 401 Water Quality Certification.

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

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

## **U.S. ARMY CORPS OF ENGINEERS**

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

Cultural Resources: Review of the latest published version of the National Register of Historic Places 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. Presently unknown archaeological, scientific, prehistorical or historical data may be located at the site and could be affected by the proposed work.

Endangered Species: A preliminary review the U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service's Protected Resource Divisions (NMFSPRD)'s list of Endangered and Threatened Species (IPaC) indicates the following listed species may occur in the project area: Tricolored Bat (*Perimyotis subflavus*); West Indian Manatee (*Trichechus manatus*); Eastern black rail (*Laterallus jamaicensis*); Wood stork (*Mycteria americana*); Eastern indigo snake (*Drymarchon corais couperi*); the Monarch butterfly (*Danaus plexippus*) and pondberry (*Lindera melissifolia*).

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.

Public Hearing: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application for a Department of the Army permit. Requests for public hearings shall state, with particularity, the reasons for requesting a public hearing. The decision whether to hold a public hearing is at the discretion of the District Engineer, or his designated appointee, based on the need for additional substantial information necessary in evaluating the proposed project.

Comment Period: Anyone wishing to comment on this application for a Department of the Army permit should submit comments by email to [sarah.e.wise@usace.army.mil](mailto: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 Wise, 100 West Oglethorpe Avenue, Savannah, Georgia 31401, 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 Sarah Wise, Lead Biologist, Coastal Branch at 912-652-5550.

Enclosures:

1. Figure 1 – Vicinity Map
2. Plan and Profile Drawings

**1.0 INTRODUCTION:**

Scannell Properties #732, LLC, is proposing the development of construction of two logistics buildings totaling 1,309,800 square feet within Rockingham Industrial Park. The project area totals approximately 128.782 acres located adjacent to and north of Veterans Parkway within Savannah, Chatham County, Georgia (32.013331°, - 81.188331°). The project is located approximately 8.1 miles from Interstate 95, 4.5 miles from Interstate 16, 15 miles from Savannah/Hilton Head International Airport, and 7.1 miles from the Port of Savannah.

**2.0 BACKGROUND:**

**Applicant Information:** Scannell Properties was founded in 1990 with a vision to design and deliver top-quality commercial building services. Scannell is a privately held commercial real estate development company specializing in build-to-suit and speculative projects for the industrial, office, and multifamily markets. Since 1990, Scannell has developed more than 150 million square feet, with an annual development volume of more than \$5 billion. With 14 regional offices across the U.S., Canada and Europe, Scannell has completed hundreds of projects for FedEx, Best Buy, GE, Nestle, General Mills and many other national and global companies. With nine regional offices in Alexandria, VA, Chicago, IL, Dallas, TX, Denver, CO, Indianapolis, IN, Kansas City, MO, Minneapolis, MN, San Francisco Bay Area, and Southern California, Scannell is one of the most experienced industrial developers in the U.S. and specializes in the supply chain and transportation logistics sector including development of:

- Distribution and warehouses
- E-Commerce fulfillment Centers
- Truck terminals
- Manufacturing facilities
- Light industrial
- Special Purpose, cold storage, labs, etc.

Scannell has participated in numerous developments in the Savannah Area market and the proposed project will expand their existing development within Rockingham Industrial Park.

**Savannah Area Market Status:** As documented by numerous market reports, conservative estimations indicate the greater Savannah Area market will need a total of 180,000,000 square feet of industrial space by 2030. The below calculation is based off Q2 2023 numbers.

**Table 1. Industrial Space Summary**

Projected total need by 2030	180,000,000 sf
Inventory as of Q2 2023	113,985,306 sf
Under construction as of Q2 2023	23,989,942 sf
Additional square foot needed	42,024,752 sf

Based on conservative projections from real-estate professionals and existing market data, the greater Savannah Area market will need 45,000,000-50,000,000 square feet of industrial space over what is currently available in the market and under construction.

In addition, Georgia Ports Authority leaders presented an update on the port’s \$1.9 billion master plan and infrastructure investments at the Savannah State of the Port event on Oct. 12, 2023. Governor Kemp stated, “As economic engines for the state and our gateways to the global market, the ports in Savannah and Brunswick are essential to maintaining Georgia’s unprecedented and decade-long status as the No. 1 state for business,”

Georgia Ports Authority President and CEO Griff Lynch stated “We need to be ready for future economic cycles. We’re talking to customers and designing a gateway port and inland supply chain that meets their long-term requirements. We’re all-in on this. The decisions we make will decide who we become as we prepare for the next wave of future cargo.” Of the many topics discussed during the event, several key points regarding growth of the industrial market included:

- The population of the U.S. Southeast has grown by 9 percent since 2012, adding 6.5 million people and increasing consumer demand. The fastest growing states are Texas, Florida, North Carolina, Georgia, South Carolina, and Tennessee. This trend has also resulted in manufacturing shifting to the Southeast, with major brands establishing a presence.
- Source shifting in Southeast Asia – as customers and ocean carriers respond to a “China plus one” sourcing trend – also favors U.S. East Coast delivery. Southeast Asia shipping routes to the U.S. East Coast via the Suez Canal are five days faster than U.S. West Coast routings.
- GPA handled volumes for FY2023 of 5.4 million TEU and forecasts 4-6 percent growth for the coming years. At the Port of Brunswick, Roll-on/Roll-off cargo hit a record in FY2023, leading GPA to an overall growth of 17.7 percent over the previous year, at 723,515 units.
- Savannah warehouse vacancy rate is currently 4.32 percent in Savannah according to the most recent figures by CBRE. The optimal range is 6-8 percent vacancy, so GPA is looking to attract more investment by developers and investors.

As documented above, the Savannah Area market continues to need industrial space to satisfy the current and future growth predictions.

### **3.0 PROJECT PURPOSE & NEED:**

The basic project purpose is to provide warehousing and distribution space. The overall project purpose is to construct 1,309,800 square feet of industrial space within the Westside Submarket. While this project and its proposed square footage represents 2.5 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 within the Rockingham Industrial Park.

### **4.0 EXISTING SITE CONDITIONS:**

Historically, the entire Rockingham Tract was intensively managed for agricultural purposes. Historic aerial imagery confirms that until the mid-1980’s the entire tract, including the project area, consisted of open field with agricultural ditches. It was only after the farming operations were suspended that portions of the site began to naturalize into freshwater wetland. The tidal marsh area naturalized within the property after construction of Veterans Parkway and the failure/modification of a water control structure on Hunter Army Airfield in the late 1990’s. Today, the project site consists of habitat typical for Chatham County and contains mixed pine hardwood upland and freshwater wetland dominated by Chinese tallow and wax myrtle. Tidal areas are dominated by saltmarsh cordgrass. As verified by the USACE, the 128.78-acre project area contains 103.97 acres of upland, 23.40 acres of freshwater and tidal wetland, and 1.41 freshwater man-made ditch.

### **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 to/from Veterans Parkway via the newly

constructed Warehouse Road within the existing industrial park. One building will be constructed totaling approximately 608,400 and a second building will total 701,400 square feet. Two ponds designed to satisfy the stormwater management needs of the site are positioned at various locations along the perimeter of the buildings and parking area. Permit drawings depicting the proposed project are provided in Appendix C.

Due to the size of the warehouse buildings, the location and the 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, completely avoids impacts to all wetlands (freshwater & tidal) and limits aquatic resource impacts to the man-made ditches that bisect the upland. As depicted in the attached permit drawings, this proposed site plan requires 0.798 acres of ditch impact to facilitate site access and general development fill (warehouse, parking, etc.).

## 6.0 ALTERNATIVES ANALYSIS:

As part of the overall project, a thorough alternatives analysis was completed. A review of the 404(b)(1) guideline 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, six alternative sites including the applicant’s preferred site, and two on-site alternatives including the applicant’s preferred on-site configuration. The permit drawings depicting the proposed site plan are provided in Appendix C. Mapping information for off-site alternatives is provided in Appendix D and on-site alternatives are provided in Appendix E. 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.

**6.1 Practicability/Reasonability Screening Selection Criteria:** The following provides a summary of each key criterion.

- Capable of being done considering cost: Site development costs must be reasonable considering scope, scale, and type of project, total costs, funding source, etc.
- Capable of being done considering logistics: Specific logistics requirements were associated with geographic location, size, entitlements, utilities, proximate infrastructure, etc.
  - Geographic Location: The Savannah industrial real estate market includes Chatham, Bryan, Liberty and Effingham Counties in Georgia and Jasper County, South Carolina. Within this market, there are nine sub-markets. The proposed project includes construction of an industrial facility which will serve the Georgia Ports and the proposed project is located within the

Southside/Highway 17 Submarket. Because this industrial site is unique for this submarket and no other industrial tracks of similar size exist, the review area was expanded to include three additional submarkets in Chatham County including the Westside Submarket, the Crossroads/Dean Forest Submarket and the Port Corridor Submarket.

- Size: The proposed facility including buildings, parking and stormwater detention totals approximately 104.9 acres. Thus, the minimum acreage suitable to support the project totals 105 acres.
  - Utilities: With any development project, utility service or access to utility services (water, sewer, electrical, gas, phone, cable, etc.) is 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.
- Property can be reasonably obtained: The project site must be available or could be acquired specifically for development.
  - Property can be reasonably expanded: The project site must be able to reasonably accommodate future expansion. For this project, expansion of the proposed facility is not anticipated.
  - Property can be reasonably managed: The project site cannot contain restrictions precluding operation or management of the site for the intended use and must be currently zoned or could be rezoned for the intended use.
  - Property can meet the basic project purpose: The project site must meet the basic project purpose.
  - Property can meet the overall project purpose: The project site must meet the 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.

**6.2 No Action Alternative:** A “no action” alternative must be considered, and complete avoidance of aquatic resources was the first alternative considered for this project. Due to the location of wetlands and ditches and proposed land use (industrial warehousing), complete avoidance of aquatic resource 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 and does not meet the project purpose, this alternative was determined to be unreasonable and not practicable.

**6.3 Off-Site Alternatives:** As noted above, the project site unique for this submarket and no other industrial tracks of similar size exist. For this reason, the review area was expanded to include three additional submarkets in Chatham County including the Westside Submarket, the Crossroads/Dean Forest Submarket and the Port Corridor Submarket. The off-site alternatives analysis was completed using geothinQ which is a GIS software program for engineers and planning professionals. The following provides a summary of steps associated with the site selection and determination of practicable alternatives:

**Step 1.** Considering the geographic location and minimum tract size, the first step included a query of all parcels between 105 acres and 140 acres within the Southside/Highway 17 Submarket, Westside Submarket, the Crossroads/Dean Forest Submarket and the Port Corridor Submarket. This property



search generated 56 parcels. Appendix D includes a spreadsheet with all parcel information and exhibits depicting the general location of each parcel.

**Step 2.** Next, each parcel was evaluated to determine the availability of the specific tract. Tracts that were owned by state or federal agencies, protected by conservation easement, existing or proposed mitigation bank sites, under contract for purchase, under development or already planned for development, or were known to have an unwilling seller were eliminated from the potential off-site alternatives. Based on this evaluation, Tract 1 was conservation property, Tracts 2-26 are located in an area where rezoning is prohibited, no utilities, did not contain suitable access, etc., and Tracts 27-54 are not for sale, developed, under contract for development or owned by a developer.

**Step 3.** The last step included LEPA review of 2 remaining sites which contained a reasonable acreage of upland which could potentially support the proposed project and the applicant's preferred alternative. For these remaining sites and environmental impacts were evaluated.

**6.3.1 Applicants Preferred Site:** The applicant's preferred alternative totals 128.78 acres located adjacent to and north of Veterans Parkway. As documented above, the entire Rockingham Tract was intensively managed for agricultural purposes. Today, the project site consists of habitat typical for Chatham County and contains mixed pine hardwood upland and freshwater wetland dominated by Chinese tallow and wax myrtle. Tidal areas are dominated by saltmarsh cordgrass. The property is not located within the 100-year flood zone. Review of aerial photographs, U.S. Geological Survey topographic maps, National Wetlands Inventory maps, the Natural Resource Conservation Service Soil Survey and the U.S. Fish and Wildlife Service's Information, Planning, and Conservation System (IPaC) suggests that this site does not contain any threatened or endangered species or habitat required to support any listed species. Review of Georgia's Natural Archaeological and Historic Resources GIS (GNAHRGIS) indicates the property does not contain any cultural or archaeological sites. Based on current site conditions, past and current land uses, and known occurrences within the general vicinity, the project site will not impact cultural or archaeological resources.

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is capable of being done considering logistics for the following reasons:
  - This alternative is located within the geographic review area for the project.
  - This alternative meets the minimum tract size requirement for construction of the proposed facility.
  - Utility services (water, sewer, electrical, gas, phone, cable, etc.) suitable to support the proposed project are currently provided to the site. The site is currently accessed by Eldora Road.
- This alternative can be reasonably obtained. The property is currently zoned for intended use and has been approved by the local municipality for the proposed use.
- This alternative can accommodate the size requirements of the current and future needs of the project.
- This alternative can be reasonably managed and does not contain restrictions precluding operation or management of the site for the intended use.
- This alternative meets the basic project purpose.
- This alternative meets the overall project purpose.

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

**6.3.2 Off-Site Alternative 1:** This tract totals approximately 132.96 acres located north of Jimmy Deloach Parkway approximately 1 mile north of Highway 80 within Chatham County. Aerial photography indicates the southern portion of the site has been managed for agriculture since at least the early 1900's. Based on the NWI, this site contains ~47.51 acres of wetland. Approximately 50 acres of the site is located within the 100-year flood zone. Review of aerial photographs, USGS topographic maps, NWI maps, the NRCS Soil Survey, and the IPaC suggests this site does not contain habitat required to support any listed species. Review of GNAHRGIS indicates a historic site of an unknown age is located in the middle of this alternative site. For this reason, development of this tract could potentially affect cultural or archaeological resources.

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is capable of being done considering logistics for the following reasons.
  - This alternative is located within the geographic review area for the project.
  - This alternative meets the minimum tract size requirement for construction of the proposed industrial space.
  - The site is currently accessed from Jimmy Deloach Highway and Towles Road, and utility services suitable to support the proposed project are not currently provided to the site but could be extended.
- This alternative can be reasonably obtained.
- This alternative can accommodate both, current and potential future expansion needs for the proposed facility due to the size of the site.
- This alternative can be reasonably managed and does not contain restrictions precluding operation or management of the site for the intended use. The site is currently zoned for residential use but due to the location and adjacent commercial and industrial use, it is assumed the property could be rezoned for industrial use.
- This alternative meets the basic project purpose.
- This alternative meets the overall project purpose.

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

**6.3.3 Off-Site Alternative 2:** This tract totals approximately 111.29 acres located south of US Highway 80 approximately 2 miles east of Interstate 95 within Chatham County. Aerial photography indicates the left portion of the property has been naturally regenerating since the early 1900's and the right portion is the Savannah Oglethorpe Speedway. Based on the NWI, this site contains 58.57 acres of wetland, and approximately 20 acres of the site is located within the 100-year flood zone. Review of aerial photographs, USGS topographic maps, NWI maps, the NRCS Soil Survey, and the IPaC suggests this site does not contain habitat required to support any listed species. Review of Georgia's Natural Archaeological and Historic Resources GIS (GNAHRGIS) indicates a historic site of an unknown age is located in the middle of this alternative site. For this reason, development of this tract could potentially affect cultural or archaeological resources.

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is capable of being done considering logistics for the following reasons.
  - This alternative is located within the geographic review area for the project.
  - This alternative meets the minimum tract size requirement for construction of the proposed industrial space.
  - The site is currently accessed by Highway 80 which supports the industrial truck traffic that would be generated by the proposed project and utility services suitable to support the proposed project are currently available.

- This alternative can be reasonably obtained.
- This alternative can accommodate both, current and potential future expansion needs for the proposed facility due to the size of the site.
- This alternative can be reasonably managed and does not contain restrictions precluding operation or management of the site for the intended use. The site is currently zoned for residential use but due to the location, it is assumed the property could be rezoned for industrial use.
- This alternative meets the basic project purpose.
- This alternative meets the overall project purpose.

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

**Table 2: Summary of Practicable Alternatives**

Practicability/ Reasonability Screening Selection Criteria	Applicants Preferred Alt	Off-Site Alternatives 1	Off-Site Alternatives 2-26	Off-Site Alternatives 27-54	Off-Site Alternatives 55-56	On-Site Alt 1	No Action
Capable of being done considering cost	Yes	Yes	No	Yes	Yes	Yes	Yes
Capable of being done considering logistics	Yes	No	No	No	Yes	Yes	No
Property can be reasonably obtained	Yes	No	No	No	Yes	Yes	Yes
Property can be reasonably expanded	Yes	No	No	No	Yes	Yes	No
Property can be reasonably managed	Yes	No	No	No	Yes	Yes	Yes
Meets basic project purpose	Yes	No	No	No	Yes	Yes	No
Meets overall project purpose	Yes	No	No	No	Yes	Yes	No
<b>Practicable (Y or N)</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>

**6.4 Review of Practicable Alternatives:** Following a determination of practicable alternatives using the “Practicability/Reasonability Screening Selection Criteria”, the applicant completed an analysis of practicable alternatives to identify the least environmentally damaging practicable alternative pursuant to 40 CFR 230.7(b)(1). The purpose of the below analysis is to ensure that “no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem”. The applicant evaluated potential environmental impacts that would result from construction of the proposed facility. This evaluation was completed by considering environmental factors which could impact development of the site. The environmental factors included:

- Stream Impacts (quantitative). The estimated linear footage of potential stream impact was evaluated for each practicable alternative.
- Stream Impacts (qualitative). The functional value of potential stream impact areas was evaluated for each practicable alternative. A low, moderate, or high value was assigned using the Savannah District’s Standard Operating Procedure (SOP) For Compensatory Mitigation (Version 2.0).
- Wetland Impacts (quantitative). The estimated acreage of potential wetland impact was evaluated for each practicable alternative.

- Wetland Function (qualitative). The functional value of potential wetland impact areas was evaluated for each practicable alternative. Savannah District's Standard Operating Procedure (SOP) For Compensatory Mitigation (Version 2.0).
- Impacts to Other Waters (quantitative). The acreage of open water impact for each site was considered during review of each practicable alternative.
- Other Waters Functions (qualitative). The functional value of any open water impact areas was evaluated for each practicable alternative. A low, moderate, or high value was assigned based on habitat type and condition. Examples of high value would be lakes, impoundments, and/or features occurring naturally. Examples of low value would be man-made features which have not naturalized and provide little to no biological support (i.e. borrow pit).
- Federally Listed Threatened or Endangered Species. A preliminary assessment of each practicable alternative was conducted to determine the potential occurrence of animal and plants species (or their preferred habitats) currently listed as threatened or endangered by state and federal regulations [Federal Endangered Species Act of 1973 (16 USC 1531-1543)]. The USFWS IPaC database at <http://ecos.fws.gov/ipac/> database was reviewed to determine plant and animal species as endangered or threatened for each alternative.
- Cultural Resources. A preliminary assessment of cultural resources was conducted for each site by reviewing available Georgia's Natural, Archaeological and Historic Resources GIS (GNAHRGIS) database. Potential impacts to sites listed or eligible for listing on the National Register of Historic Places was noted for each alternative.
- Flood Plain Impacts. The estimated acreage of flood plain impact was evaluated for each practicable alternative. Flood plain mitigation is required by the local municipality (every cubic yard of fill within the 100-year flood plain requires a cy of flood plain creation within the site).

Considering the assessment criteria above, the applicant evaluated three alternatives including the applicant's preferred alternative. The following provides a summary of each practicable alternative and associated environmental impacts.

#### **6.4.1 Proposed Action/Preferred Alternative:**

- Stream Impacts (quantitative). Not applicable. No streams are identified within the property on the NWI or USGS topographic survey.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). Review of the NWI indicates ~6.44 acres of wetland would be impacted by the proposed project. Based on the delineated wetland boundary, no wetland impacts will occur during development of the project site.
- Wetland Function (qualitative). An evaluation of each wetland and each specific impact was completed using the SOP. Based on this assessment and by assessing the four functions (water storage, biogeochemical cycling, wetland community characteristic, and faunal habitat), the qualitative functional capacity score for all wetlands was determined to be low.
- Impacts to Other Waters (quantitative). Based on the NWI, ~0.63 acre of ditch will be impacted by the proposed development. Based on the delineated wetland boundary, 0.798 acre of man-made ditch will be impacted by the project.
- Other Waters Functions (qualitative). An evaluation of each wetland and each specific impact was completed using the SOP. Based on this assessment and by assessing the four functions (water storage, biogeochemical cycling, wetland community characteristic, and faunal habitat), the qualitative functional capacity score for all wetlands was determined to be low.
- Federally Listed Threatened or Endangered Species. 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. Review of GNAHRGIS indicates that the property does not contain any cultural or archaeological sites.
- Floodplain Impacts. Based on review of available FEMA maps, floodplain would be impacted by the proposed project.

#### 6.4.2 Off-Site Alternative 1:

- Stream Impacts (quantitative). Not applicable. No streams are identified within the property on the NWI or USGS topographic survey.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). Based on the NWI, ~31.99 acres wetland would be impacted by the proposed project.
- Wetland Function (qualitative). An evaluation of each wetland and each specific impact was completed using the SOP. Based on this assessment and by assessing the four functions (water storage, biogeochemical cycling, wetland community characteristic, and faunal habitat), the qualitative functional capacity score for all wetlands was determined to be moderate.
- Impacts to Other Waters (quantitative). 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.
- Federally Listed Threatened or Endangered Species. 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. Review of GNAHRGIS indicates that the property one historic property of an unknown age.
- Floodplain Impacts. Based on review of available FEMA maps, floodplain would be impacted by the proposed project.

#### 6.4.3 Off-Site Alternative 2:

- Stream Impacts (quantitative). No streams would be impacted that are identified within the property on the NWI or USGS topographic survey.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). Based on the NWI, ~33.19 acres wetland would be impacted by the proposed project.
- Wetland Function (qualitative). An evaluation of each wetland and each specific impact was completed using the Savannah District's Standard Operating Procedure (SOP) For Compensatory Mitigation (Version 2.0) Non-Riverine Wetland Qualitative Stream Assessment Worksheet. Based on this assessment and by assessing the four functions (water storage, biogeochemical cycling, wetland community characteristic, and faunal habitat), the qualitative functional capacity score for all wetlands was determined to be moderate.
- Impacts to Other Waters (quantitative). 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.
- Federally Listed Threatened or Endangered Species. 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. Review of GNAHRGIS indicates that the property one historic property of an unknown age.
- Floodplain Impacts. Based on review of available FEMA maps, floodplain would be impacted by the

proposed project.

#### 6.4.4 On-Site Configuration 1:

- Stream Impacts (quantitative). Not applicable. No streams are identified within the property on the NWI or USGS topographic survey.
- Stream Impacts (qualitative). Not applicable.
- Wetland Impacts (quantitative). Review of the NWI indicates ~6.44 acres of wetland would be impacted by the proposed project. Based on the delineated wetland boundary, 0.12 acre of freshwater wetland and 0.94 acre of salt marsh impacts will occur during development of the project site.
- Wetland Function (qualitative). An evaluation of each wetland and each specific impact was completed using the SOP. Based on this assessment and by assessing the four functions (water storage, biogeochemical cycling, wetland community characteristic, and faunal habitat), the qualitative functional capacity score for all wetlands was determined to be low.
- Impacts to Other Waters (quantitative). Based on the NWI, ~0.85 acre of ditch will be impacted by the proposed development. Based on the delineated wetland boundary, 0.798 acre of man-made ditch will be impacted by the project.
- Other Waters Functions (qualitative). An evaluation of each wetland and each specific impact was completed using the SOP. Based on this assessment and by assessing the four functions (water storage, biogeochemical cycling, wetland community characteristic, and faunal habitat), the qualitative functional capacity score for all wetlands was determined to be low.
- Federally Listed Threatened or Endangered Species. 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. Review of GNAHRGIS indicates that the property does not contain any cultural or archaeological sites.
- Floodplain Impacts. Based on review of available FEMA maps, floodplain would be impacted by the proposed project.

**6.5 Summary of Practicable 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 3 provides a summary of the practicable alternatives and the values for each factor.

**Table 3.** Summary of Least Environmentally Damaging Practicable Alternative Assessment

Environmental Factors	Preferred Alternative & Configuration	Off-Site Alternative 1	Off-Site Alternative 2	On-Site Alternative 1
Stream Impacts USGS (Linear Feet) NWI/Delineation	None	None	None	None
Functional Value of Impacted Stream	N/A	N/A	N/A	N/A
Wetland Impacts (Acres) NWI/Delineation	6.44/0.00	31.99/N/A	33.19/N/A	6.44/0.00
Functional Value of Impacted Wetland	Moderate	Moderate	Moderate	Moderate
Impacts to Other Waters (Acres) NWI/USGS	0.63/0.00	None	None	0.85/0.00
Functional Value of Impacted Other Waters	Low	N/A	N/A	Low
Federal Endangered Species Impact	Not Likely	Not Likely	Not Likely	Not Likely
Cultural Resources Impact	Not Likely	Potentially	Potentially	Not Likely
Floodplain Impact (Acres)	No	Yes	Yes	No
<b>LEDPA</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>

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

#### 7.0 THREATENED 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 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 the County (Table 3.). 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 during numerous site visits in 2021, 2022 and 2023.

U.S. Fish and Wildlife Service’s Information, Planning, and Conservation System indicates the following species have the potential to occur within the project site.

- West Indian Manatee (*Trichechus manatus*)
- Eastern Black Rail (*Laterallus jamaicensis ssp. Jamaicen*)
- Wood Stork (*Mycteria americana*)
- Eastern Indigo Snake (*Drymarchon corais couperi*)

- Pondberry (*Lindera melissifolia*)

The following text briefly discusses each listed species and potential for the species to reside within the subject site.

**West Indian Manatee (*Trichechus manatus*):** The West Indian manatee is a large aquatic mammal whose habitat consists of warm coastal and spring fed waters. It is listed as endangered under both its state and federal status. They are large, gray aquatic mammals with bodies that taper to a flat, paddle-shaped tail. They have two forelimbs, called flippers, with three to four nails on each flipper. Their head and face are wrinkled with whiskers on the snout. During winter months these mammals are primarily confined to the coastal waters of the southern half of Florida and the spring fed rivers of Florida and Georgia. During the summer months as the water temperature rises, the manatees' range expands as far north as Virginia and it is during these months that the "manatees" may occasionally utilize the estuaries of coastal Georgia. Critical habitat for this species has been identified as large portions of coastal Florida including the St. Mary's River.

The project site does not contain tidal waters habitat which could support the manatee. The saltmarsh within the project area is bisected by veterans parkway and the railroad further south. These two features prohibit tidal waters suitable to support this species. For this reason, the proposed project will not adversely affect the West Indian Manatee.

**Eastern Black Rail (*Laterallus jamaicensis ssp. Jamaicensis*):** The Eastern black rail is a small bird living in salt and freshwater marshes in portions of the United States, Central America, and South America. Males and females are similar in size and adults are generally pale to blackish-gray, with a small blackish bill and bright red eyes. Eastern black rail habitat can be tidally or non-tidally influenced, and range in salinity from salt to brackish to fresh. Tidal height and volume vary greatly between the Atlantic and Gulf coasts and therefore contribute to differences in salt marsh cover plants in the bird's habitat. Diet includes Insects, snails, seeds, etc. Loss of habitat is the main threat to this species however where habitat is projected numbers are likely stable. Additional threats include:

- Habitat fragmentation, alteration and conversion
- Altered hydrology
- Land management
- Climate change
- Oil and chemical spills, as well as environmental contaminants
- Disease
- Altered food webs and predation
- Human disturbance

While the project site contains freshwater wetland and tidal marsh, as noted above, the site was historically an intensively managed farm. As a result, habitat fragmentation, alteration and conversion, hydrology alteration via ditching and land management impacts associated with past farming and recent development have occurred within the tract. Additionally, the proposed project does not require impacts to either freshwater or tidal marsh. Due to the location of the site, historic land management and current habitat conditions and because the project impacts are limited to man-made ditches, the proposed project will not adversely affect this species.



**Wood Stork (*Mycteria americana*):**

The wood stork was listed endangered by the USFWS on 28 February 1984 (Federal Register 49 (4):7332-7335). It is listed as endangered under both its state and federal status. Wood storks use freshwater and estuarine wetlands as feeding, nesting, and roosting sites, and annual population fluctuations are closely related to the year-to-year differences in the quality and quantity of suitable habitat. The overall decline in wood stork numbers is attributed to the loss or degradation of essential wetland habitat primarily in southern Florida. The adult is a large bird 33-45 inches tall and 58-71 inches in wingspan. Males typically weigh 5.5-7.3 lbs; females weigh 4.4-6.2 lbs. They appear all white on the ground, with blackish-gray legs and pink feet. In flight, the trailing edge of the wings is black. The head is dark brown with a bald, black face, and the thick down curved bill is dusky yellow. Juvenile birds are a duller version of the adult, generally browner on the neck, and with a paler bill. They nest colonially with up to twenty-five nests in one tree. Breeding once a year, a female lays 3-5 eggs in the typical clutch. The eggs are incubated 27-32 days by both sexes.

Although the project site contains freshwater wetland and tidal wetland systems which could provide wood stork feeding habitat. Because the development activities completely avoid freshwater and tidal wetlands and impacts are limited to shallow ditches, the project will not adversely affect this species.

**Eastern Indigo Snake (*Drymarchon corais couperi*):** The Eastern indigo snake is a large nonpoisonous, stout bodied snake averaging six to seven feet in length. Its federal status is listed as Not Applicable and its state status is listed as threatened. The snake is smooth scaled and uniform glossy blue-black throughout its body except for some reddish orange or cream color suffusion on its throat, cheeks and chin. This coloration varies with some individuals having distinct coloration and others with no coloration. In the extreme southern reaches of its range (South Florida), the snake is less restricted and inhabits flatwoods, tropical hammocks, dry glades and moist bogs. In this region of its range, overwintering sites include tree stumps and other underground dens. In the northern portion of its range, including south Alabama, the indigo snake requires deep sand ridges and is often associated with the gopher tortoise. The indigo snake is dependent upon the deep burrows dug by the gopher tortoise and uses them as a refuge from the extreme hot and cold temperatures. This restricted habitat is even more isolated by the snakes' preference for the interspersed wet lowlands and cypress ponds.

Habitat required to support this species is not present within the project area and the proposed project will have no effect on the eastern indigo snake.

**Pondberry (*Lindera melissifolia*):** Pondberry or pond spicebush, is a stoloniferous, deciduous, aromatic shrub in the laurel family. This federally listed endangered species is native to the southeastern United States, and its demise is associated with habitat loss from extensive drainage of wetlands for agriculture and forestry. Pondberry occurs in dense thickets with erect or ascending shoots up to 2 m tall and few branches; stems are connected underground by stolons. Pondberry occurs in shallow depression ponds in wetland habitats with hydric soils, along margins of cypress ponds, and in seasonally wet, low areas among bottomland hardwoods. At present there are some 36 populations in Alabama, Arkansas, Georgia, Mississippi, Missouri, North Carolina, and South Carolina. Many of the existing colonies of pondberry are small and occupy only a portion of the apparently suitable habitat.

The project site does not contain habitat required to support this species. Due to the geographic location of the project, historic land uses and absence of required habitat, the project will have no effect on pondberry.

**Table 4. Protected Species**

Species IPaC Indicated May Occur on Site	Ipac Status	Critical Habitat (yes / no)	Applicable EDGES	Species Habitat(s), as Described in the EDGES (e.g., wetland, stream, forested, flatwoods, sandhills)	Does this Habitat occur on Project Site (yes / no)	Will this Habitat be Altered by the Project (yes / no)	Determination	
							EDGES	RLC
West Indian Manatee (Trichechus manatus)	Threatened	No	West Indian Manatee	warm coastal and spring fed waters	Yes	No	NLAA	-
Wood Stork (Mycteria americana)	Threatened	No	Wood Stork	relatively open aquatic vegetation, calm water, permanent or seasonal water depths 2-15"	No	No	NLAA	No Effect
Eastern Indigo Snake (Drymarchon corais couperi)	Threatened	No	Eastern Indigo Snake	longleaf pine and wiregrass community, Fuquay, Blanton, Centenary, Foxworth, Echaw, Meldim, Dothan, Ridgeland, Stilson, Chipley, and Albany soils	No	No	No Effect	No Effect
Eastern Black Rail (Laterallus jamaicensis)	Threatened	No	n/a	tidal and freshwater marsh	No	No	n/a	No Effect
Pondberry (Lindera melissifolia)	Endangered	No	n/a	pond margins and wet savannas	No	No	n/a	No Effect

Based on observations during numerous site visits, existing habitats documented within the site, absence of listed species and geographic location of the project, no adverse impacts to protected species will occur in association with the proposed project.

#### 8.0 CULTURAL RESOURCES:

Brockington & Associates completed a Phase I Cultural Resources & Archaeological Survey for the permit area. This document was reviewed by, and concurrence was received from both the USACE and the Historic Preservation Division. A complete copy of the report and correspondence is provided in Appendix H.

#### 9.0 STORMWATER MANAGEMENT:

A preliminary stormwater management plan has been designed by Coleman Company (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.

#### 10.0 COMPENSATORY MITIGATION:

As documented in the attached permit drawings, the proposed site plan has been designed to avoid all impacts to wetland areas within the property and limits aquatic resource impacts to man-made ditches. For this reason, no compensatory mitigation is required for the project.

**11.0 CONCLUSION:**

Scannell Properties #732, LLC. is proposing the construction of two distribution facilities on Tract 8 within Rockingham Industrial Park. The proposed site plan avoids all wetlands within the tract and proposed impacts are limited to 0.798 acre of manmade ditch. Impacts are required during the construction of two logistics buildings totaling 1,309,800 square feet and associated parking, stormwater management facilities, etc. As documented throughout this permit application package, the applicant has avoided and minimized impacts to aquatic resources to the greatest extent practicable. The applicant will implement BMP's during the construction phase of the project. These measures will comply with the "FIELD MANUAL FOR EROSION & SEDIMENT CONTROL IN GEORGIA, Vegetative & Structural BMPs for Land-Disturbing Activities".



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**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

INSTRUCTIONS FOR SUBMITTING APPLICATION:

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

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

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

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

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

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

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

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

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

4. Name and address of applicant.  
Scannell Properties #732, LLC  
Attn: Attn: Mr. Marc Pflöging  
8801 River Crossing Blvd, Suite 300  
Indianapolis, IN 46240  
317.218.1653  
[Marcp@scannellproperties.com](mailto:Marcp@scannellproperties.com)

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

Lat. 32.013331° Long. -81.188331°

Chatham County	Military District	Savannah In City or Town
Near City or Town	Subdivision	Lot No.
128.782 Acres Lot Size	9-12 ft MSL Approximate Elevation of Lot	Georgia State
unnamed man made ditch Name of Waterway	Salt Creek Name of Nearest Creek, River, Sound, Bay or Hammock	



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

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

A. Purpose of excavation or fill To facilitate construction of a logistics center

1. Access channel : length \_\_\_\_\_ depth \_\_\_\_\_ width \_\_\_\_\_  
2. Boat basin : length \_\_\_\_\_ depth \_\_\_\_\_ width \_\_\_\_\_  
3. Fill area : see attached length \_\_\_\_\_ depth \_\_\_\_\_ width \_\_\_\_\_  
4. Other: length \_\_\_\_\_ depth \_\_\_\_\_ width \_\_\_\_\_

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

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

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

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

C. Excavated material :

1. Cubic yards N/A

2. Type of material N/A

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

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

B. Does the disposal area contain any wetland? Yes \_\_\_\_\_ No X Project does not include construction of dredge disposal site.

C. Location of disposal area N/A

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

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

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

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

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

A. Please submit the following:

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

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

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


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

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

B. Please provide the following statements:

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

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

  
Signature of Applicant, manager

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.

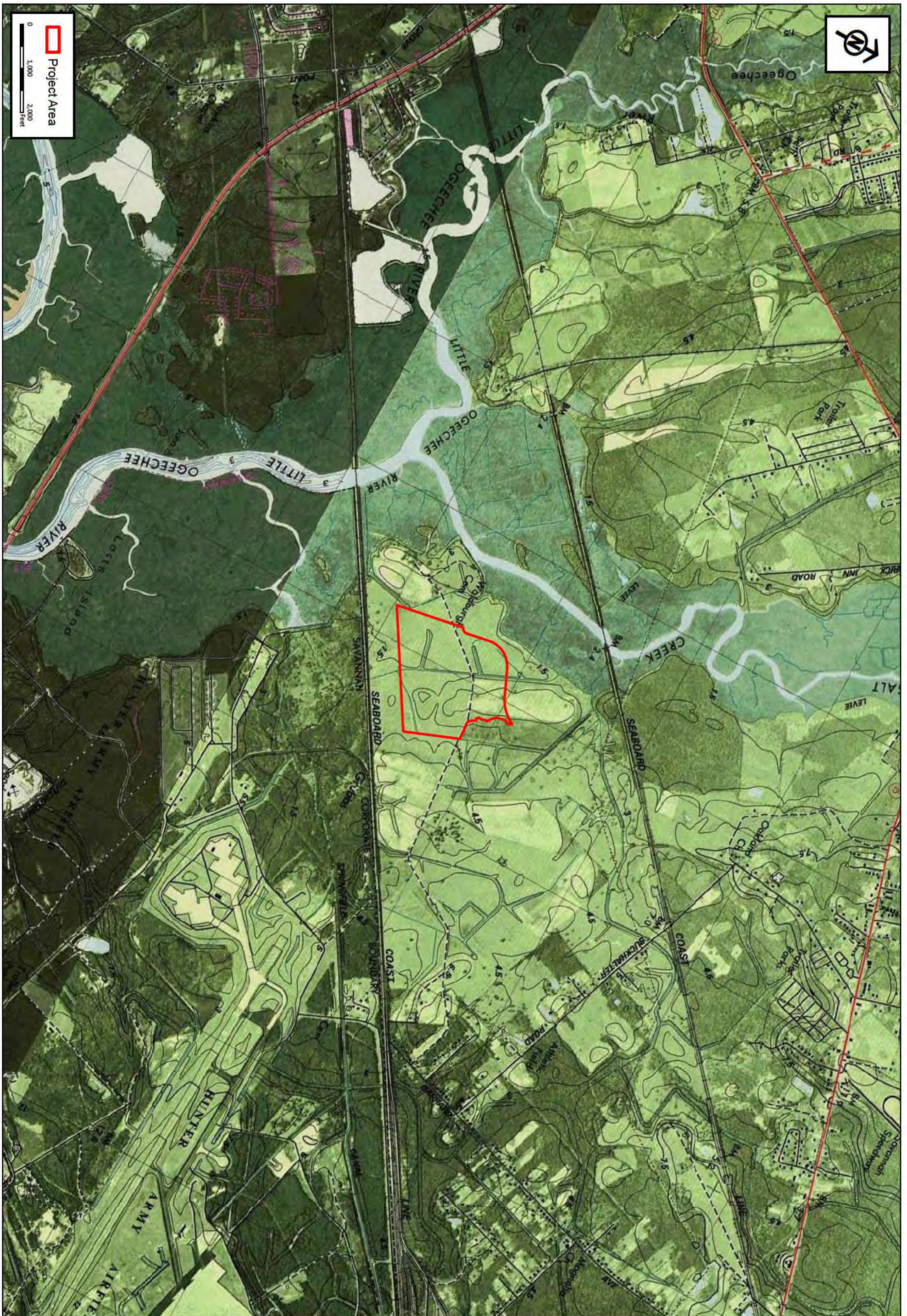




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## **APPENDIX B:** Figures/Site Maps





RLC Project No.:	23-143
Figure No.:	2
Prepared By:	MW
Sketch Date:	1/8/2024
Map Scale :	1 inch = 2,000 feet

### Rockingham Industrial Park Tract 8

Chatham County, Georgia

### USGS Topographic Survey

Prepared For: Scannell Properties #732, LLC



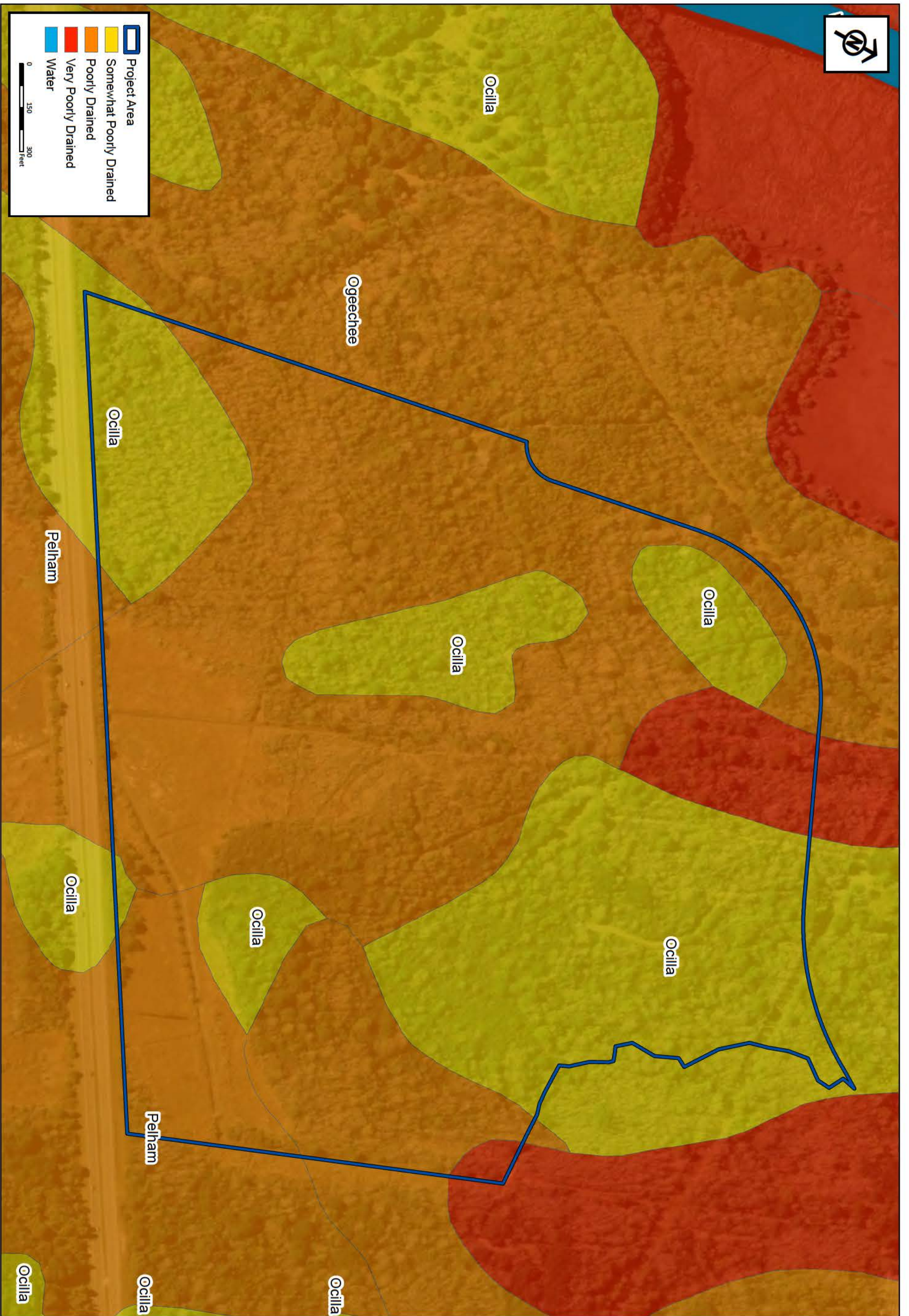
### RESOURCE+LAND CONSULTANTS

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



	Project Area
	Somewhat Poorly Drained
	Poorly Drained
	Very Poorly Drained
	Water

0 150 300 Feet



RLC Project No.:	23-143
Figure No.:	3
Prepared By:	MW
Sketch Date:	1/8/2024
Map Scale :	1 inch = 300 feet

**Rockingham Industrial Park  
Tract 8**  
Chatham County, Georgia

**NRCS Soil Survey**  
Prepared For: Scannell Properties #732, LLC

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



RLC Project No.: 23-143  
 Figure No.: 4  
 Prepared By: MW  
 Sketch Date: 1/8/2024  
 Map Scale : 1 inch = 300 feet

**Rockingham Industrial Park  
 Tract 8**  
 Chatham County, Georgia

**National Wetlands  
 Inventory**  
 Prepared For: Scannell Properties #732, LLC

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

0  
150  
300  
Feet

**Project Area**



RLC Project No.:	23-143
Figure No.:	5
Prepared By:	MW
Sketch Date:	1/8/2024
Map Scale :	1 inch = 300 feet

**Rockingham Industrial Park  
Tract 8**

Chatham County, Georgia

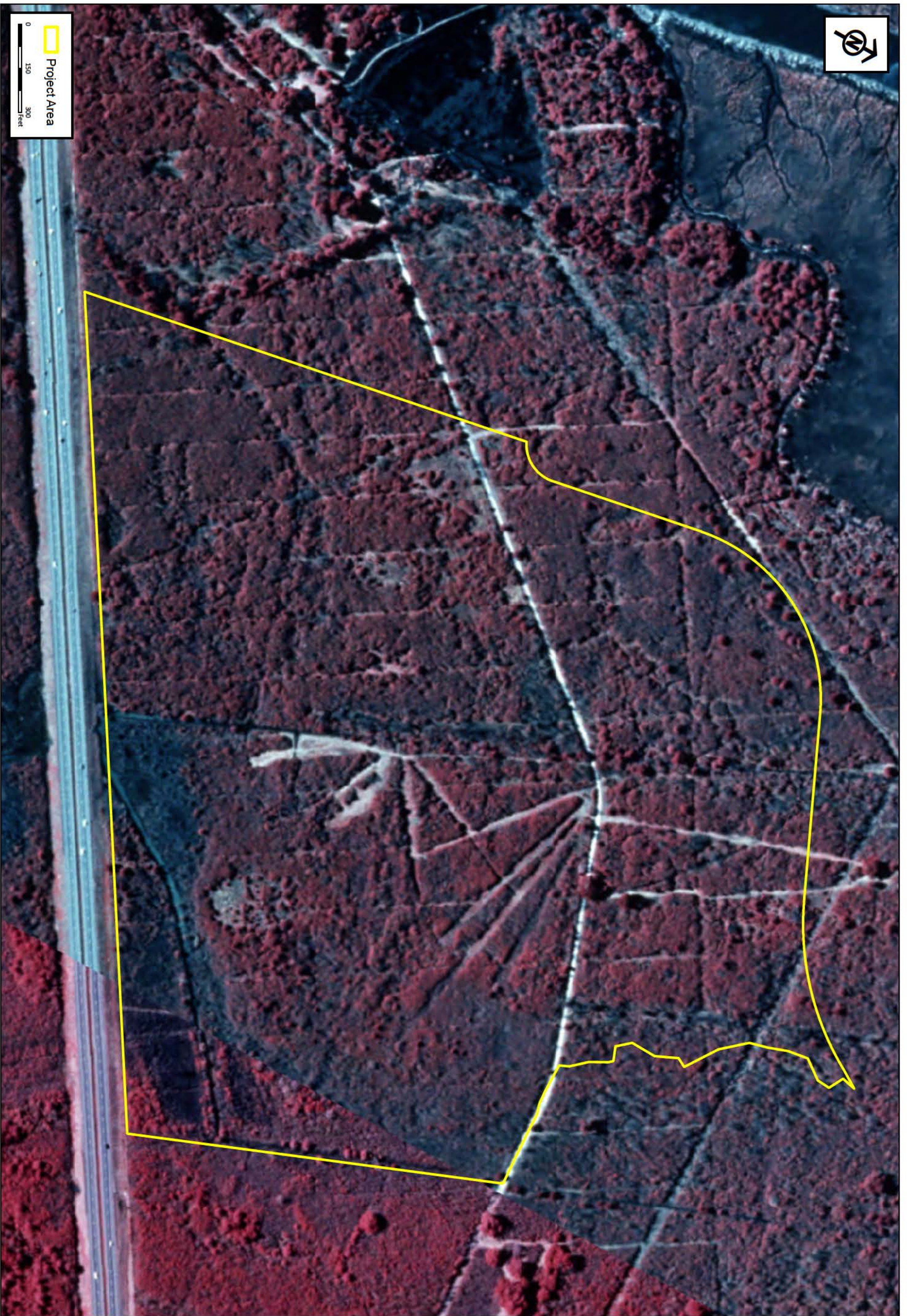
**Ortho Aerial**

Prepared For: Scannell Properties #732, LLC



**RESOURCE+LAND  
CONSULTANTS**

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



0  
150  
300  
Feet

 Project Area



RLC Project No.:	23-143
Figure No.:	6
Prepared By:	MW
Sketch Date:	1/8/2024
Map Scale :	1 inch = 300 feet

**Rockingham Industrial Park  
Tract 8**

Chatham County, Georgia

**1999 Color-infrared Imagery**

Prepared For: Scannell Properties #732, LLC

 **RESOURCE+LAND  
CONSULTANTS**

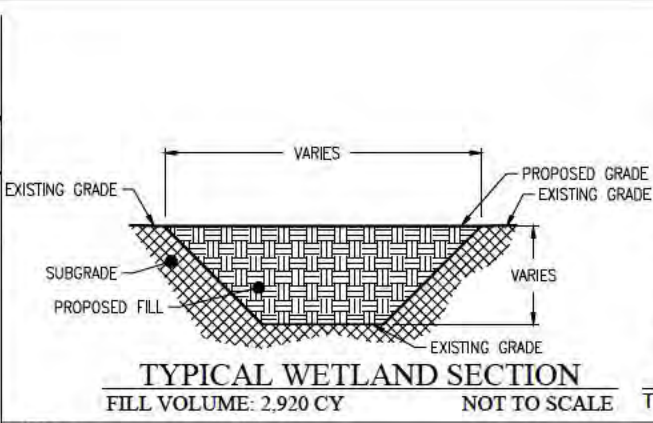
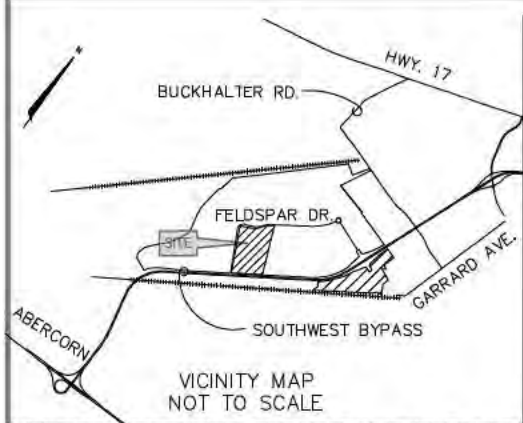
41 Park of Commerce Way, Ste 101  
Savannah, GA 31405  
tel 912.443.5896 fax 912.443.5898



**RESOURCE+LAND**  
CONSULTANTS

## **APPENDIX C:** Permit Drawings



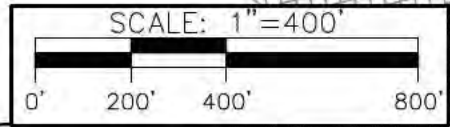
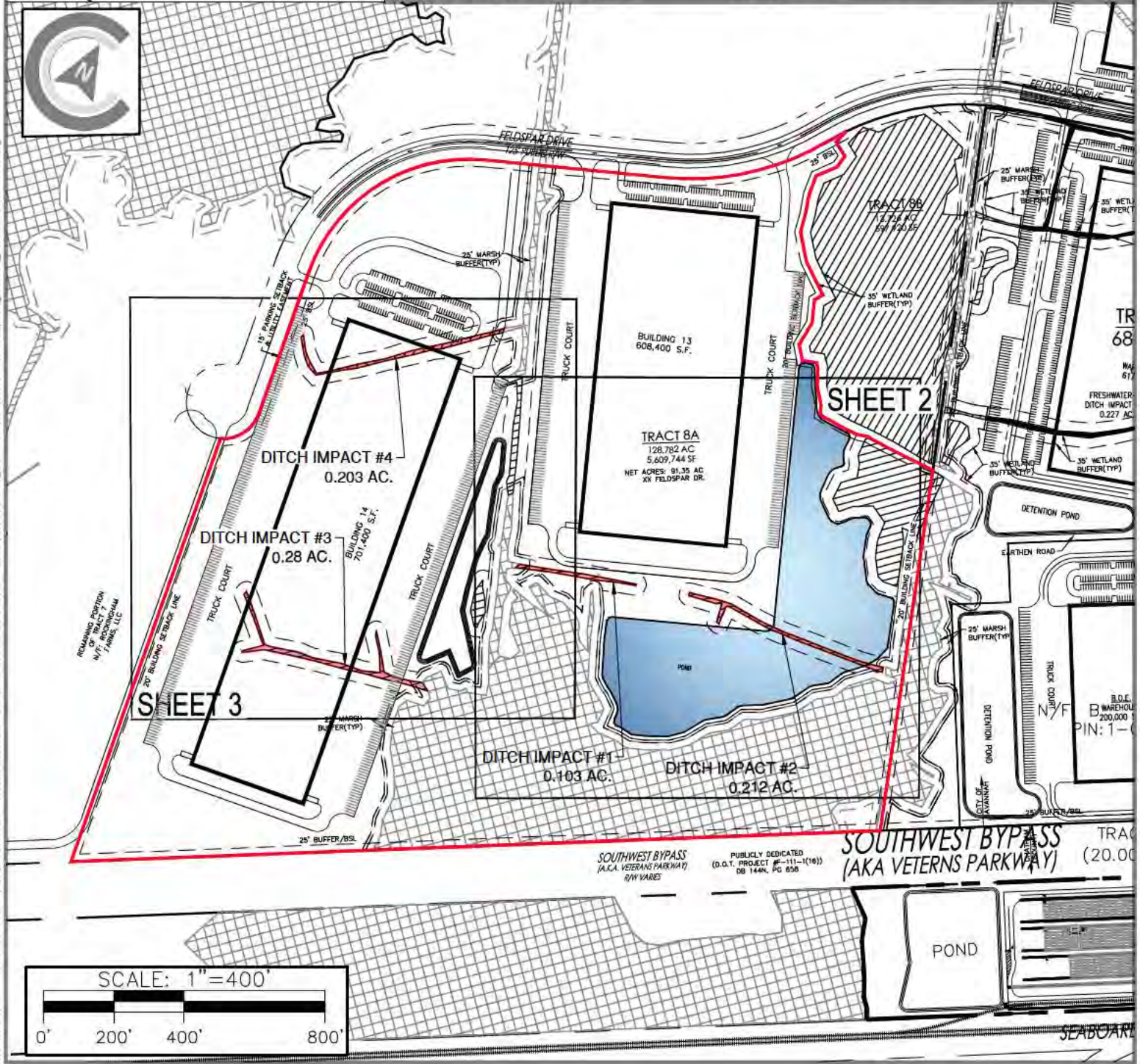


**SITE DATA:**

PROJECT AREA = 128.782 AC
UPLAND AREA = 103.97 AC
WETLAND AREA = 23.40 AC
DITCH AREA = 1.41 AC
DITCH IMPACTS = 0.798 AC

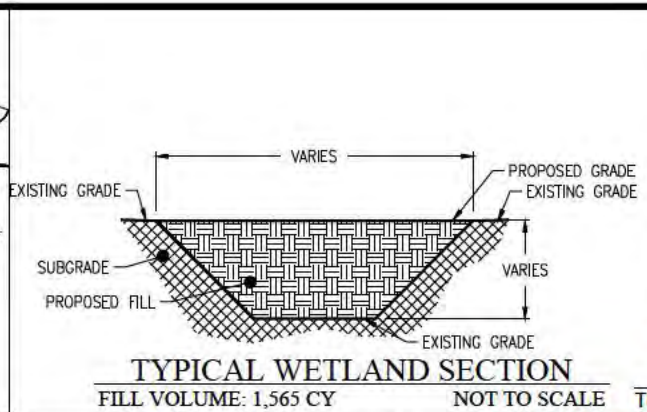
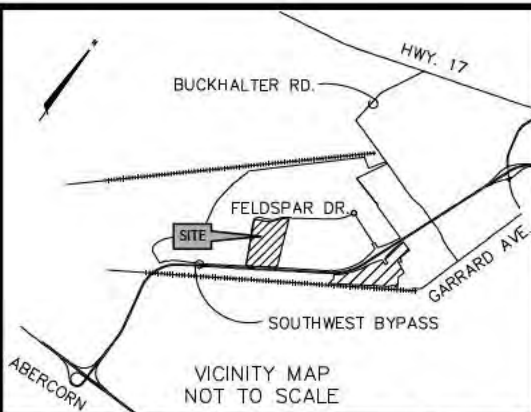
**WETLAND DISTURBANCE**

	FILL AREA	FILL VOLUME
DI-1	0.103 AC	300 CY
DI-2	0.212 AC	620 CY
DI-3	0.28 AC	700 CY
DI-4	0.203 AC	640 CY
<b>TOTAL IMPACT</b>	<b>0.798 AC</b>	



© 2018 COLEMAN COMPANY, INC. DATE PLOTTED: 1/2/2024 9:46 AM BY: JOHN ROBINSON (DRAWING PATH: C:\2020\20-540.006\DWG\PLANNING\wetland\30-540.006-DITCH IMPACTS - TRACT 8 DITCHES 12.08.2023.dwg)

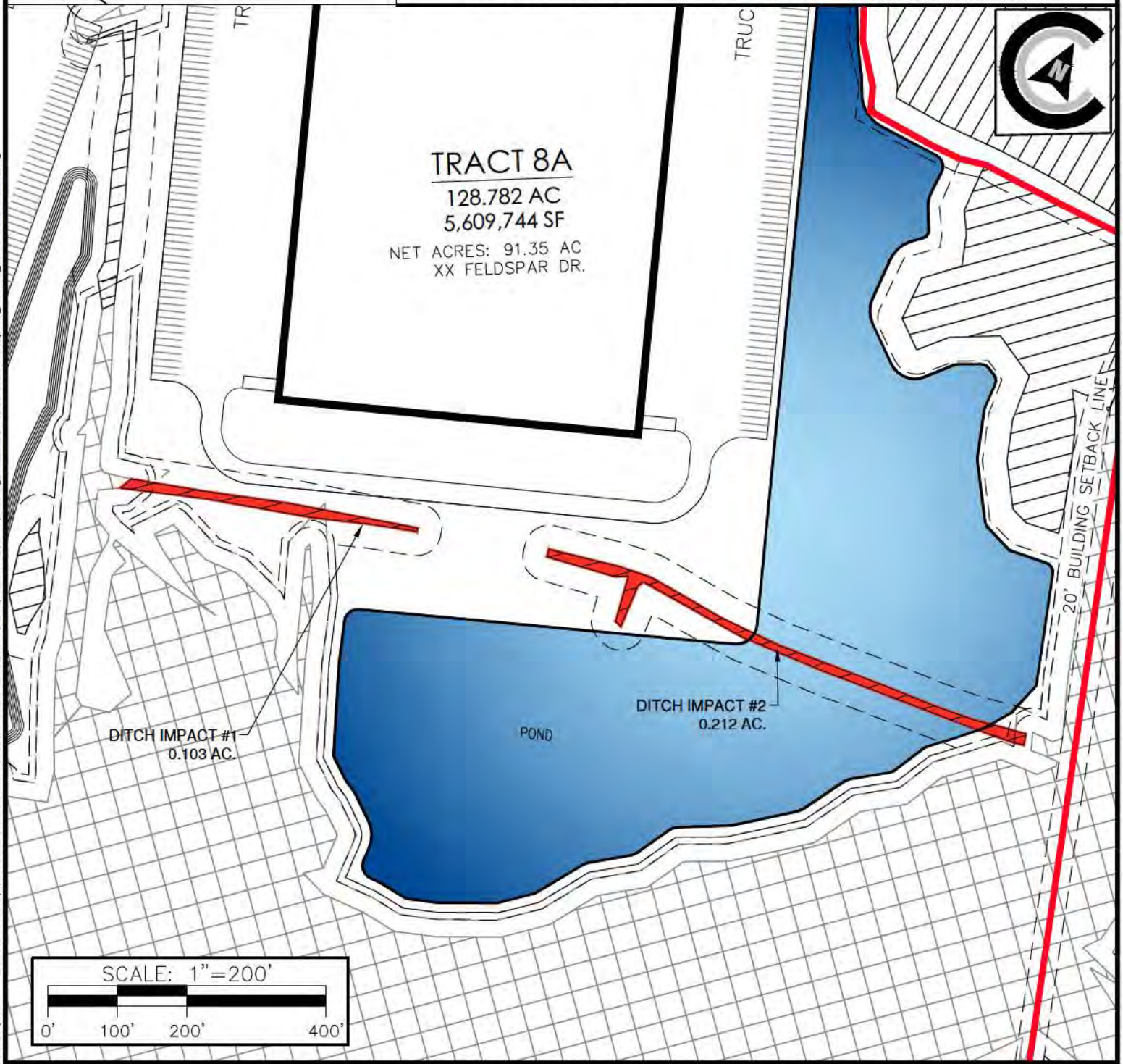
1/3	SHEET:	JOB NUMBER: 20-540.006	AQUATIC RESOURCE IMPACTS TRACT 8 PREPARED FOR: SCANNELL PROPERTIES #732, LLC	<p><b>COLEMAN COMPANY</b> ENGINEERS • SURVEYORS</p>
	DATE: 12.08.2023	DRAWN BY: JWR		
CHECKED BY: DLF	SCALE: AS NOTED			



**SITE DATA:**  
 PROJECT AREA = 128.782 AC  
 UPLAND AREA = 103.97 AC  
 WETLAND AREA = 23.40 AC  
 DITCH AREA = 1.41 AC  
 DITCH IMPACTS = 0.798 AC

**WETLAND DISTURBANCE**

	FILL AREA	FILL VOLUME
DI-1	0.103 AC	300 CY
DI-2	0.212 AC	620 CY
DI-3	0.28 AC	700 CY
DI-4	0.203 AC	640 CY
<b>TOTAL IMPACT</b>		<b>0.798 AC.</b>



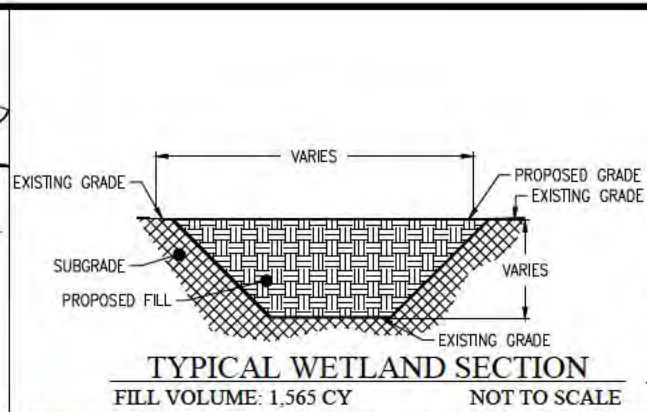
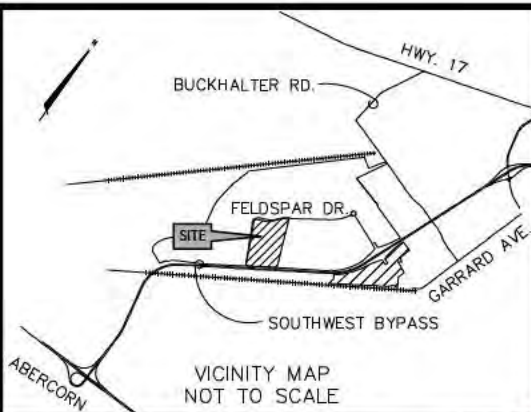
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SHEET:  
2/3

JOB NUMBER: 20-540.006  
 DATE: 12.08.2023  
 DRAWN BY: JWR  
 CHECKED BY: DLF  
 SCALE: AS NOTED

WETLAND IMPACT EXHIBIT  
 TRACT 8B  
 PREPARED FOR: SCANNELL PROPERTIES #732, LLC



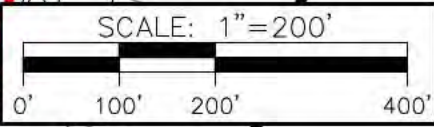
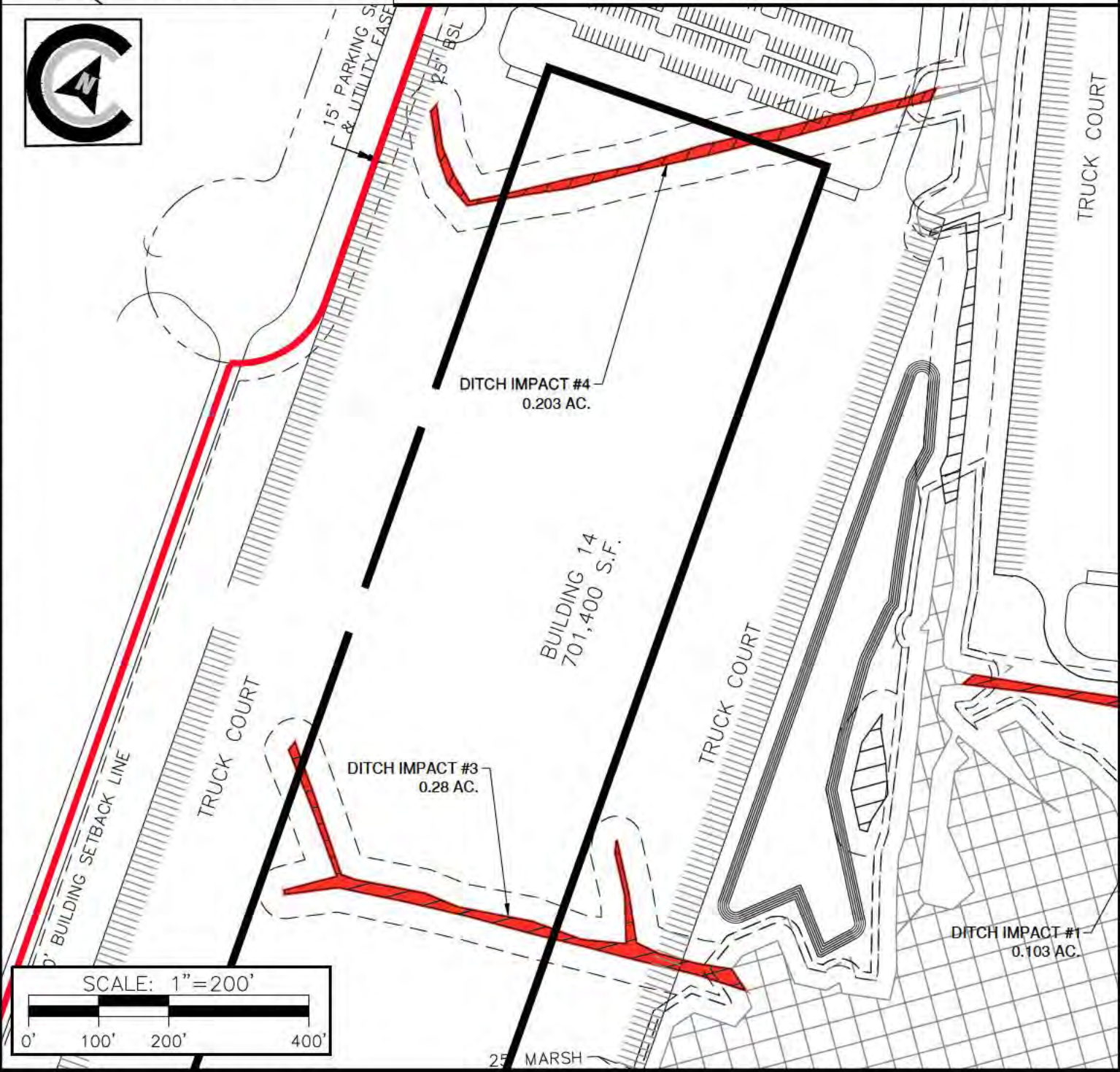


**SITE DATA:**  
 PROJECT AREA = 128.782 AC  
 UPLAND AREA = 103.97 AC  
 WETLAND AREA = 23.40 AC  
 DITCH AREA = 1.41 AC  
 DITCH IMPACTS = 0.798 AC

**WETLAND DISTURBANCE**

	FILL AREA	FILL VOLUME
DI-1	0.103 AC	300 CY
DI-2	0.212 AC	620 CY
DI-3	0.28 AC	700 CY
DI-4	0.203 AC	640 CY
<b>TOTAL IMPACT</b>		<b>0.798 AC.</b>

**TYPICAL WETLAND SECTION**  
 FILL VOLUME: 1,565 CY



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SHEET:  
3/3

JOB NUMBER: 20-540.006  
 DATE: 12.08.2023  
 DRAWN BY: JWR  
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 SCALE: AS NOTED

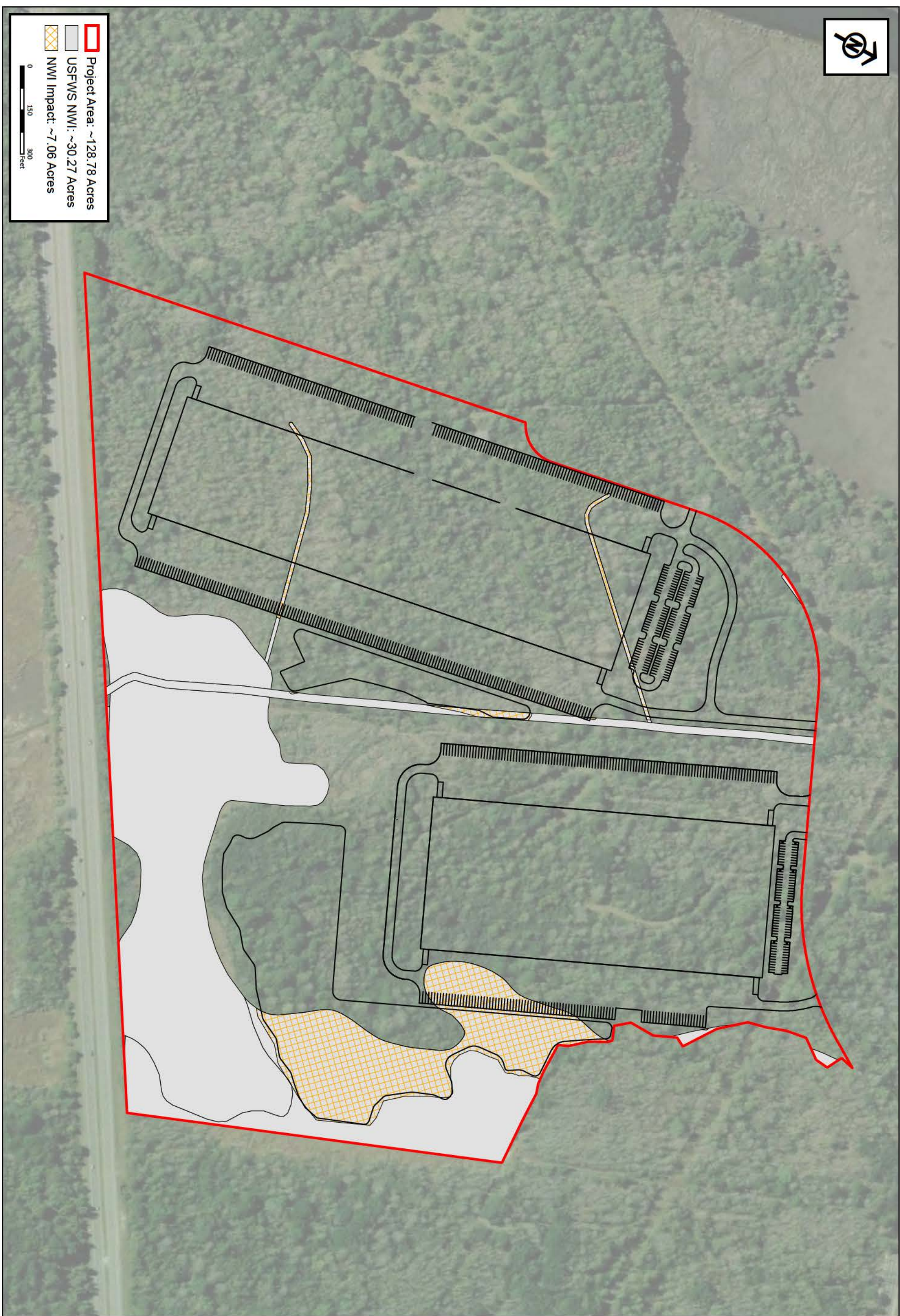
**WETLAND IMPACT EXHIBIT**  
**TRACT 8B**  
 PREPARED FOR: SCANNELL PROPERTIES #732, LLC





 Project Area: ~128.78 Acres  
 USFWS NWI: ~30.27 Acres  
 NWI Impact: ~7.06 Acres

0 150 300 Feet



RLC Project No.:	23-143
Figure No.:	8
Prepared By:	MW
Sketch Date:	1/11/2024
Map Scale:	1 inch = 300 feet

**Rockingham Industrial Park  
Tract 8**

Chatham County, Georgia

**Applicant's Preferred  
Alternative  
USFWS NWI Impact**

Prepared For: Scannell Properties #732, LLC



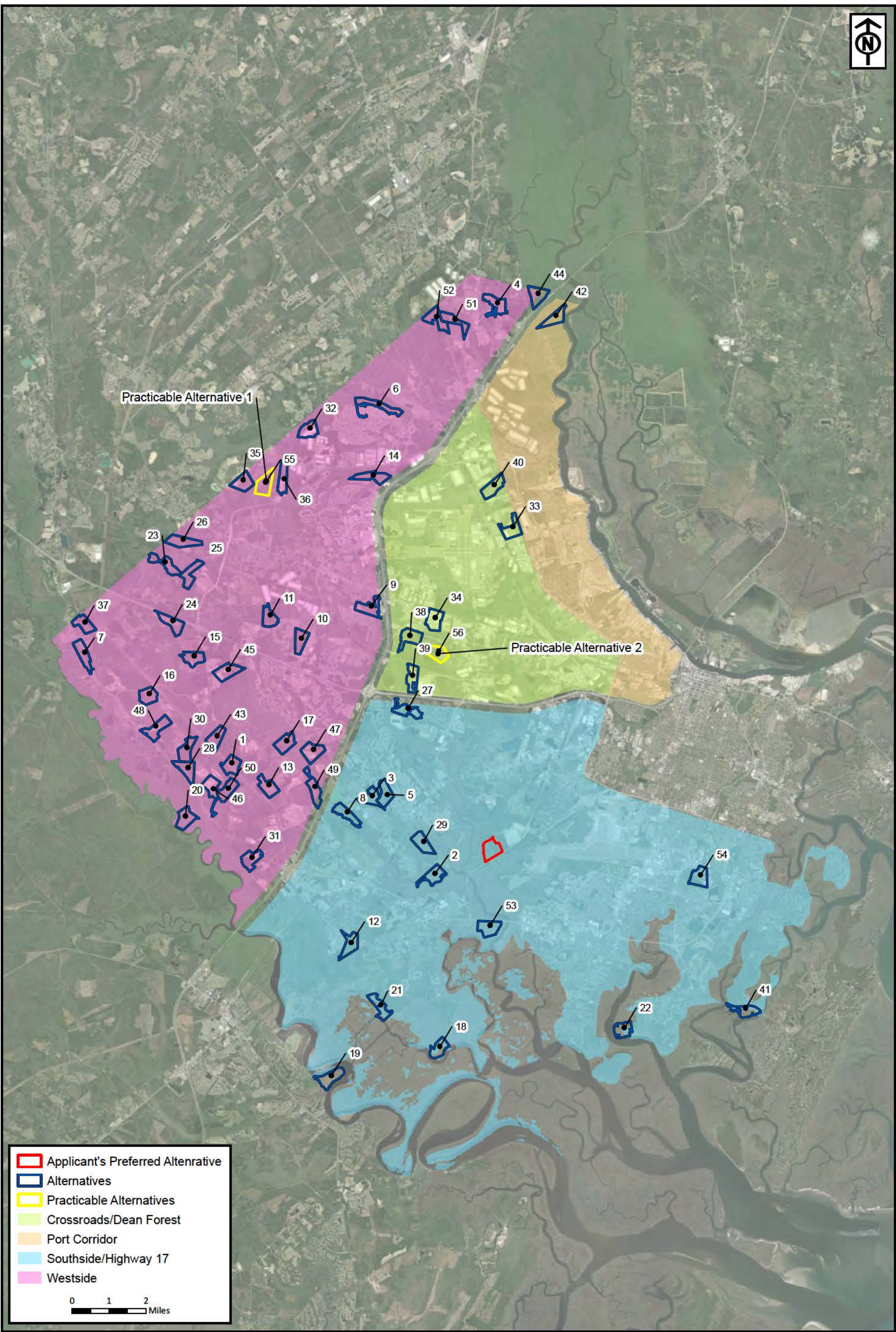
**RESOURCE+LAND  
CONSULTANTS**

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



**RESOURCE+LAND**  
CONSULTANTS

## **APPENDIX D:** Off-Site Alternatives



- Applicant's Preferred Alternative
- Alternatives
- Practicable Alternatives
- Crossroads/Dean Forest
- Port Corridor
- Southside/Highway 17
- Westside

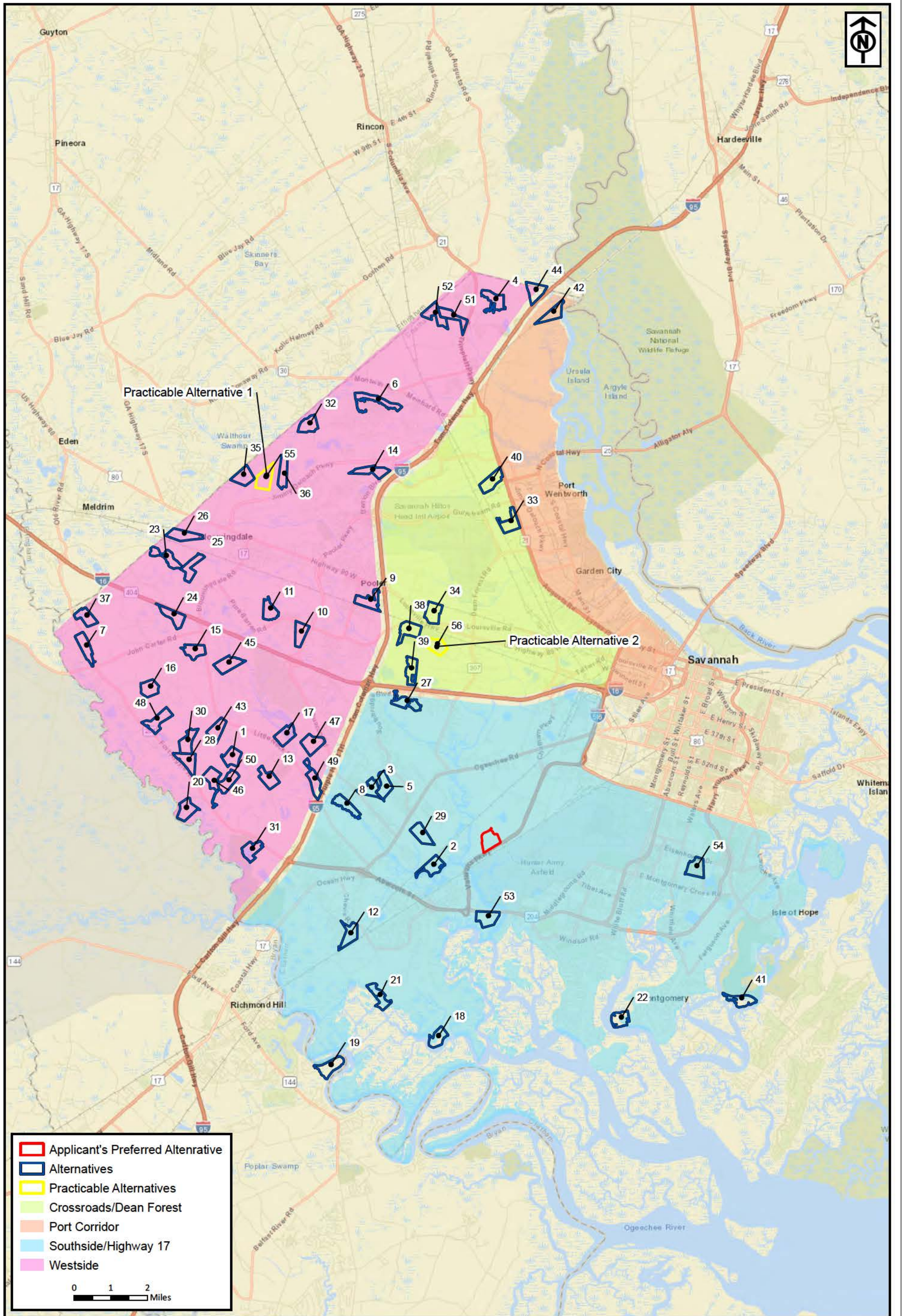
0    1    2  
Miles

RLC Project No.: 23-143  
 Figure No.: 2  
 Prepared By: MW  
 Sketch Date: 1/11/2024  
 Map Scale: 1 inch = 2 miles

**Rockingham Industrial Park  
 Tract 8**  
 Chatham County, Georgia

**Alternative Sites**  
 Prepared For: Scannell Properties #732, LLC

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



RLC Project No.: 23-143  
 Figure No.: 1  
 Prepared By: MW  
 Sketch Date: 1/11/2024  
 Map Scale: 1 inch = 2 miles

**Rockingham Industrial Park  
 Tract 8**  
 Chatham County, Georgia

**Alternative Sites**

Prepared For: Scannell Properties #732, LLC



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