



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

June 7, 2022

Regulatory Division
SAS-2015-00235

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-2015-00235

Applicant: Mr. Hugh "Trip" Tollison
Savannah Harbor - Interstate 16 Corridor Joint Development Authority
131 Hutchinson Island Road, 4th Floor
Savannah, Georgia 31421

Co-Applicant: Mr. Pat Wilson, Commissioner
Georgia Department of Economic Development
Technology Square, 75 5th Street, N.W., Suite 1200
Atlanta, Georgia 30308

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

Project Purpose as Proposed by Applicant: The applicant's stated project purpose is "to develop a site that can accommodate the construction of an Electric Vehicle Original Equipment Manufacturing (EVOEM) assembly facility".

Location of Proposed Work: The 2,541.25-acre project site contains waters and wetlands adjacent to Black Creek and is located south of the intersection of Georgia Highway 280 and Interstate 16, in Ellabell, Bryan County, Georgia (Latitude 32.1584, Longitude -81.4533).

Description of Work Subject to the Jurisdiction of the U.S. Army Corps of Engineer: The proposed project involves the construction of EVOEM facility, which would manufacture and distribute fully electric vehicles. The EVOEM assembly facility's vehicle production components will accommodate various processes, including

form pressing, fabrication, painting, product completion/assembly, quality control and special products production. The required distribution components include a train yard, truck yard, and finished product yard. The EVOEM complex will also include employee services components supporting the large workforce (e.g., food services, medical facilities, employee parking, training facilities, and administrative workspaces). The storage component will include the central storage building and liquid storage building. The quality facilities will include a product testing area, testing station, and other miscellaneous buildings required for quality assurance support. Additional components include waste facilities, security facilities, and utility facilities.

As proposed, the Applicant's preferred site plan would result in the loss of 221.36 acres of wetland, 763 linear feet of intermittent stream and 1.58 acres of ditch. As compensatory mitigation, the applicant is proposing to purchase the 4,120.20 grandfather stream credits from Yam Grandy Mitigation Bank and satisfy the 1,328.24 grandfather (166.08 2018 SOP) wetland mitigation credit requirement through the Savannah District In-Lieu Fee Program.

BACKGROUND

The proposed site is approximately 2,541.25 acres and is located in the southeast quadrant of the Interstate 16 and Highway 280 intersection. The site was created by assembling five parcels. The topography ranges from an elevation of 20' within the wetland area along Black Creek, to almost 90' near Interstate 16. Topographic elevation change of this magnitude is uncommon for properties within the lower Coastal Plain of Georgia. To date, the Corps has completed two Approved Jurisdictional Determinations (AJD) and one expanded preliminary JD for a combination of four different tracts located within the project site. Currently, the Corps is processing an additional AJD and aquatic resources delineation review associated with the Martin Tract.

In July 2018, the Corps issued a JPN for impacts to jurisdictional wetlands within the Bryan County Mega-Site to facilitate development of a gas-powered automobile OEM site. According to the applicant, *“since that time, the auto industry has continued to shift its focus towards production of electric vehicles and many leading auto manufacturers goals to cease building petroleum powered cars. The transformation of the automotive industry towards electrification requires construction of much larger and complex OEM facilities designed specifically for production of electric vehicles. Because the previously proposed project, which accommodates gas-powered automobile production, does not accommodate the requirements for an EVOEM assembly facility, revisions to the site plan were required.”*

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. The applicant has yet to request a Water Quality Certification from the State of Georgia. Prior to issuance of a Department of the Army Permit for a project located in, on, or adjacent to the waters of the State of Georgia, review for Water Quality Certification in accordance with Section 401 of the Clean Water Act 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. This public notice serves as notification to the Administrator of the U.S. Environmental Protection Agency (USEPA) pursuant to section 401(a)(2) of the Clean Water Act for neighboring jurisdiction review and begins the 30-day clock for USEPA to notify affected states.

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: A Phase I cultural resource survey was completed for portions of the project area in 2015 and 2018. A survey for the remaining area within the project site, not included in the past survey efforts, has been initiated. Following completion of the field survey, a complete report including a NHRP eligible resource assessment of effects, will be submitted to the Corps and GADNR-HPD for review and concurrence.

Endangered Species: A preliminary review the U.S. Fish and Wildlife Service (FWS) list of Endangered and Threatened Species (IPaC) indicates the following listed species may occur in the project area: Eastern black rail (*Laterallus jamaicensis*); wood stork

(*Mycteria americana*); Eastern indigo snake (*Drymarchon corais couperi*); gopher tortoise (*Gopherus polyphemus*); frosted flatwoods salamander (*Ambystoma cingulatum*); and the Monarch butterfly (*Danaus plexippus*).

Pursuant to Section 7(c) of the Endangered Species Act of 1973, as amended (16 U.S.C. § 1531 et seq.), we request information from the U.S. Department of the Interior, Fish and Wildlife Service, the U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service; or, any other interested party, on whether any species listed or proposed for listing may be present in the area. In addition, we are requesting information from the USFWS whether the project is within 2,500 feet of an active wood stork nesting colony.

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. Alternatively, you may submit comments in writing to the Commander, U.S. Army Corps of Engineers, Savannah District, Attention: Mrs. 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 Mrs. Sarah Wise, Team Lead, Coastal Branch at 912-652-5550.

Enclosures

Bryan County Mega Site

SECTION 404 INDIVIDUAL PERMIT APPLICATION
May 2022

Applicants: Georgia Department of Economic Development &
Savannah Harbor-Interstate 16 Corridor Joint Development Authority



**Savannah Harbor-Interstate 16 Corridor
Joint Development Authority**

BRYAN • BULLOCH • CHATHAM • EFFINGHAM

RESOURCE+LAND
CONSULTANTS



THOMAS & HUTTON

Engineering | Surveying | Planning | GIS | Consulting

Brockington
CULTURAL RESOURCES CONSULTING

Table of Contents

1.0 INTRODUCTION:	2
2.0 BACKGROUND:	2
3.0 BASIC & OVERALL PROJECT PURPOSE:	3
4.0 EXISTING SITE CONDITIONS:	4
5.0 PROPOSED PROJECT & DEVELOPMENT PLAN:	5
6.0 ALTERNATIVES ANALYSIS:	6
6.1 Practicability/Reasonability Screening Selection Criteria:	7
6.2 No Action Alternative:	7
6.3 Off-Site Alternatives & On-Site Configurations:	8
6.3.1 Preferred Site:	8
6.3.2 Off-Site Alternative 1	9
6.3.3 Off-Site Alternative 2	9
6.3.4 Off Site Alternative 3	10
6.3.5 Off Site Alternative 4	11
6.3.6 Off Site Alternative 5	12
6.3.7 Off Site Alternative 6	13
6.3.8 Off Site Alternative 7	14
6.4 On-Site Configurations:	15
6.4.1 Preferred On-Site Configuration	15
6.4.2 On-Site Configuration 2	15
6.4.3 Onsite Configuration 3	15
6.5 Alternatives Not Practicable or Reasonable	16
6.6 Review of Practicable Alternatives:	16
6.6.1 Proposed Action/Preferred Alternative/On-site Configuration.	17
6.6.2 On-Site Configuration 1	18
6.6.3 On-Site Configuration 2	19
6.6.4 Summary of Practicable Alternatives Analysis	20
7.0 THREATENED AND ENDANGERED SPECIES	20
8.0 CULTURAL RESOURCES:	21
9.0 STORM WATER MANAGEMENT	21
10.0 COMPENSATORY MITIGATION	21
11.0 CONCLUSION	21

APPENDIX:

- A: CESAS Form 19
- B: Figures/Site Maps
- C: Permit Drawings
- D: Off-Site Alternatives
- E: On-Site Configurations
- F: Compensatory Mitigation Calculations
- G: Threatened & Endangered Species Documentation, IPaC Database & Edges Information
- H: Cultural & Archaeological Resources Documentation
- I: Adjacent Landowner Information

1.0 INTRODUCTION:

The Georgia Department of Economic Development (“GDEcD”) and the Savannah Harbor-Interstate 16 Corridor Joint Development Authority (“JDA”) are proposing the development of an approximately 2,541.25-acre tract generally located adjacent to and east of Highway 280 and adjacent to and south of Interstate 16 within Bryan County, Georgia (32.164165°, -81.450411°)(“Bryan County Mega-Site” or the “Site”). Development of the Site will accommodate construction of an electric-vehicle, original-equipment-manufacturing (“EVOEM”) assembly facility for the purpose of producing and distributing fully electric vehicles.

2.0 BACKGROUND:

Georgia Department of Economic Development. GDEcD is the state's sales and marketing arm, the lead agency for attracting new business investment, encouraging the expansion of existing industry and small businesses, aligning workforce education and training with in-demand jobs, locating new markets for Georgia products, attracting tourists to Georgia, and promoting the State as a destination for arts and a location for film, music and digital entertainment projects, as well as planning and mobilizing state resources for economic development. GDEcD seeks to improve the lives and welfare of all Georgians by creating jobs and promoting economic development opportunities.

In January 2022, the Site was identified in connection with an on-going, state-wide assessment of potential locations suitable to support new industries and business expansion. These assessments are performed pursuant to GDEcD’s mission and fully leveraging its expertise. GDEcD identifies these sites based on a number of criteria known to be important for target economic development opportunities, including proximity to population centers and potential work forces, proximity to existing shipping ports, airports, availability and condition of rail and interstate highway infrastructure, availability of utilities and utility infrastructure, and site buildability. GDEcD’s assessments and subsequent analyses have identified only a handful of, so called, “mega-sites.” These unique sites met initial screening criteria summarized above. Importantly, these mega-sites are also large enough to support the type and scale of project proposed here. In addition, given the fast-paced and highly-competitive business of state-recruitment for these projects, these sites were identified because they were reasonably available. These are key factors and criteria in GDEcD’s site-selection decisions at the State level.

GDEcD’s proactive efforts to identify suitable locations for economic development projects of this scale is a key component of the State’s successes in this (again) highly-competitive, fast-paced, international competition. In addition, Georgia has natural advantages, including a diverse and well-educated work force, exceptional technical colleges and universities, a desirable climate, relatively low cost of energy, diverse, renewable and replenishing natural resources, the Nation’s 4th largest port operations, four major interstate highways, and the World’s busiest airport. These factors weigh heavily on target companies’ site-selection decisions at the national and international level.

Savannah Harbor-Interstate 16 Corridor Joint Development Authority. In late 2014, GDEcD received a request for information regarding potential tracts within Georgia that would qualify for an automotive OEM facility. The proposed manufacturing plant/facility included up to a \$1 billion private capital investment, would have created 2,000 jobs with the potential to create up to 4,000 jobs within ten years after the start of production. The Bryan County Mega-Site was a finalist for the project; however, a site within a neighboring state was selected for that project. Recognizing the potential regional impact of that project, the JDA including Chatham, Bryan, Effingham, and Bulloch Counties was formed. The JDA was created by joint resolutions of its four member counties (Bryan, Bulloch, Chatham & Effingham Counties) in 2015 for the purpose of creating jobs and investment in the region and to deliver a pad ready mega-site for the purposes of constructing an automotive OEM facility. The members of the JDA have successfully developed and/or promote numerous sites within the four-county region including:

- Belfast Commerce Park, Bryan County Mega-Site and Interstate Centre within Bryan County
- Gateway II Cannady Site, Gateway II Riggs Rail Site and Southern Gateway Commerce Park within Bulloch County

- Chatham County Economic Development Site and Savannah Manufacturing Center within Chatham County
- Georgia International Rail Park, Georgia International Trade Center, and Savannah Gateway Industrial Hub, and Savannah Portside International Park within Effingham County

Specific to this project, the JDA worked with GDEcD to recruit this EVOEM opportunity for Georgia and worked as an advocate for the four-county region, highlighting the area’s significant advantages for this project – e.g., infrastructure, work force.

The Request for Proposal. In early 2022, the GDEcD and several other states, received a Request for Proposal (“RFP”) from a leader in the electric vehicle industry (the “Company”), who develops and produces all electric vehicles, products, and services related to sustainable transportation. The Company sought proposals that met several specifications and could accommodate construction of a new EVOEM assembly facility, with required utilities. The Company seeks to expand its production capacity for additional electric vehicle lines and electric vehicle components with this new operation. The RFP announced the Company’s desire to locate within a state that is committed to supporting the growth of the United States electric vehicle industry.

Bryan County Mega-Site. As briefly mentioned above and in direct response to numerous RFP’s received by GDEcD and the JDA from 2014-2018, GDEcD and the JDA initiated all site entitlement work necessary to deliver a pad ready mega-site for the purposes of constructing an automotive OEM facility. The actions associated with this entitlement effort included land procurement, preparation of water extension design plans, site grading design plans, sewer treatment design plans, entrance road design plans, property survey, topo survey, etc. Specific to 404, the JDA completed a wetland delineation, completed a wetland survey, completed a threatened & endangered species survey, completed a cultural and archeological resources phase I survey, developed a conceptual site plan using the JDA and GDEcD expertise for such planning, prepared permit drawings, prepared and submitted a 404-permit application, and coordinated with the state and federal agencies and obtained a draft permit from the USACE in July 2019.

In light of the 2022 RFP criteria, GDEcD worked to identify the best fit for this opportunity within Georgia — recognizing that it was engaged in a highly-competitive process, targeting a rare and highly-coveted project, and competing with many of its sister states. GDEcD revisited its prior assessments of specific sites GDEcD leveraged its relationships with regional advocates like the JDA in responding to the RFP and has been working with the Company since early 2022 to bring the project to Georgia. The stakes are as great as the scope and scale of this EVOEM opportunity could bring \$5.9 billion in private capital investment and roughly 10,000+ jobs related to the investment. Considering the scope, size and specific criteria of the project and the entitlement history associated with the Bryan County Mega-Site, the Company announced its selection of Georgia for its new EVOEM facility in May 2022. Having invested significant resources and countless hours in pursuit of this opportunity and an optimal site, the JDA and GDEcD are pleased to submit this application for the development of Bryan County Mega-Site that meets the Company’s specifications for its construction of a unique, new EVOEM assembly facility. In April 2022, the company signed a Letter of Intent to be followed by an Economic Development Agreement for the project, which, among other things, requires GDEcD and the JDA to obtain required permits and prepare the site for the EVOEM assembly facility on the extremely aggressive timeline required to support the Company’s plans and success in the rapidly-developing and highly-competitive electric vehicle innovation industry.

3.0 BASIC & OVERALL PROJECT PURPOSE:

The basic purpose of the proposed project is to develop a site that can accommodate the construction of an EVOEM assembly facility. The overall project purpose is to efficiently and timely provide a construction-ready site that meets all siting criteria for the initial and build out construction of the EVOEM assembly facility.

4.0 EXISTING SITE CONDITIONS:

The subject site is uniquely suited for construction of an EVOEM assembly facility when considering location, topography, and existing habitat conditions. The proposed site is located in the southeast quadrant of the Interstate 16 and Highway 280 intersection and the 2,541.25-acre site was created by assembling only five parcels. Creating a similar sized parcel along any other intersection adjacent to Interstate 16 or Interstate 95 would require assembling many more parcels and in some cases more than 50. The topography ranges from elevation 20 feet within the wetland/floodplain along Black Creek to almost 90 feet within the development area near Interstate 16. These elevations and topographic changes are not common for properties within the lower Coastal Plain or Bryan County, Georgia. While wetlands and waters of the U.S. typically make up 30 percent or more of any large tract within the Coastal Plain of Georgia, only 16 percent of the proposed project area consists of wetlands and/or waters of the U.S. Lastly, the site has been intensively managed for timber production and while this is not uncommon for the coast of Georgia, the project could not have been timed any better when considering the age of the timber within the site. Much of the timber within the upland has been harvested within the past five years.

A jurisdictional determination was obtained for portions of the property in 2015 and an updated request including the entire Mega-Site was submitted to the USACE in 2021 and 2022. Based on this information, the 2,541.25-acre project area contains 1,880.68 acres of upland, 625.98 acres of jurisdictional wetland, 29.32 acres of non-jurisdictional wetland, 6.51 acres of pond, 1.58 acres of ditch and 763 linear feet of stream. As documented and recorded during the field surveys, dominant habitats include managed pine plantation (both upland and wetland), slope wetlands, depressional wetlands, intermittent streams, man-made ponds, open field, man-made ditches, and existing roads. The general location of each habitat is depicted on Figure 2, Appendix G. The following summary provides a brief description of each habitat.

- Managed Pine Plantation: The property consists of intensively managed pine plantation consisting of both upland and wetland. The stand age for this habitat varies across the site from recently planted to 20 years old and species composition is dictated by topography, soils and hydrology (i.e. upland pine plantation and wetland pine plantation). A general summary of species composition is as follows:
 - Upland Pine Plantation: loblolly pine (*Pinus taeda*), live oak (*Quercus virginiana*), sweetgum (*Liquidambar styraciflua*), wax myrtle (*Myrica cerifera*), blackberry (*Rubus argutus*), fetterbush (*Lyonia lucida*), broomsedge (*Andropogon virginicus*), saw palmetto (*Serenoa repens*), bracken fern (*Pteridium aquilinum*), yellow jessamine (*Gelsemium sempervirens*), and poison Ivy (*Toxicodendron radicans*).
 - Wetland Pine Plantation: slash pine, loblolly pine, red maple (*Acer rubrum*), sweetgum, water oak (*Quercus nigra*), willow oak (*Quercus phellos*), wax myrtle, swamp titi (*Cyrilla racemiflora*), fetterbush, greenbrier (*Smilax laurifolia*), blackberry, gaint Cane (*Arundinaria gigantea*), black-stem chainfern (*Woodwardia virginica*), netted chainfern (*Woodwardia areolata*), and poison ivy.
- Slope Wetlands: This habitat consists of slope wetland areas generally located along the perimeter of the site. Portions of this habitat have been recently timbered and are naturally regenerating with a variety of tree, shrub and herbaceous species. Other areas contain a relative mature canopy with a dense understory of shrub species. Species composition includes water oak, red maple, red bay, sweetgum, black gum (*Nyssa biflora*), bald cypress (*Taxodium distichum*), wax myrtle, fetterbush, titi, sphagnum moss (*Sphagnum* spp.), poison ivy, blackstem chainfern, greenbrier, blackberry, and netted chainfern.
- Depressional Wetland: The study area contains numerous isolated forested wetlands. These areas are generally consist of isolated wetlands with mature overstory and varying degrees of shrub and herbaceous cover: slash pine, red maple, red bay, sweetgum, black gum, bald cypress, fetterbush, wax

myrtle, titi, sphagnum moss, poison ivy, blackstem chainfern, greenbrier, blackberry, and netted chainfern.

- **Intermittent Streams:** The intermittent streams are located in the central portions of the forested wetland systems on the southwestern portion of the project area. These streams average approximately three feet in width and twelve inches in depth. The streams lack vegetation and consist of sand and mud bed and banks of varying heights. These streams appear to have been impacted by past land management activities, have been excavated and are incised.
- **Man-Made Pond:** Several small open water ponds are located on the eastern portion of the property which consist of a deep open water habitat with herbaceous vegetation along the water’s edge. These areas were created through a combination of excavation and dam construction.
- **Open Field:** The open fields consist of herbaceous vegetation and while these areas may have been used for agricultural purposes in the past, today these fields are used for recreational purposes.
- **Man-Made Ditches:** This habitat is defined by bed and bank of the feature with little to no vegetation present. The ditches were presumably constructed for silvicultural purposes and extend through several wetland areas across the site.
- **Existing Road:** Jernigan Road is a county-maintained dirt road which extends west to east through the center of the property.

Table 1. Habitat Summary

Habitat Type	Area (ac)
Depressional Wetlands	38.5
Existing Road	19.4
Managed Pine Plantation (including ditches)	1,836.8
Man-made Pond	6.5
Open Field	93.8
Slope Wetlands (including stream and ditches)	546.2
Total	2,541.2

5.0 PROPOSED PROJECT & DEVELOPMENT PLAN:

In July 2018, the USACE issued a public notice for impacts to jurisdictional wetland within the Bryan County Mega-Site to facilitate development of a gas-powered automobile OEM site. Since that time, the auto industry has continued to shift its focus towards production of electric vehicles and many leading auto manufacturers goals to cease building petroleum powered cars. The transformation of the automotive industry towards electrification requires construction of much larger and complex OEM facilities designed specifically for production of electric vehicles. Because the previously proposed project, which accommodates gas-powered automobile production, does not accommodate the requirements for an EVOEM assembly facility, revisions to the site plan were required. This site plan has been developed to meet the specific requirements of the EVOEM opportunity and RFP, to support and sustain its broad and complex operations, and to accommodate its many components, e.g., vehicle assembly and painting facilities, battery cell production facilities, product and technology facilities, testing, training, and distribution facilities and related infrastructure and support services.

The access for the facility will be provided on Highway 280 at two locations. The northern entrance is approximately 0.25 miles south of the Interstate 16/Highway 280 Interchange. The second access point will be located approximately 1.1 miles south of the Interstate 16/Highway 280 Interchange.

The EVOEM assembly facility's vehicle production components will accommodate various processes, including form pressing, fabrication, painting, product completion/assembly, quality control and special products production. The required distribution components include a train yard, truck yard, and finished product yard. The EVOEM complex will also include employee services components supporting the large workforce (e.g., food services, medical facilities, employee parking, training facilities, and administrative workspaces). The storage component will include the central storage building and liquid storage building. The quality facilities will include a product testing area, testing station, and other miscellaneous buildings required for quality assurance support. Additional components include waste facilities, security facilities, and utility facilities.

Facility layout was dictated by a variety of design considerations including topography, avoidance of aquatic resources, the advanced principles and methods of innovative/robotic assembly, as well as logistics and operational requirements for material flow and positioning during the production process. As depicted in the attached permit drawings, the proposed site plan includes development of 2,009.9 acres within the 2,541.25-acre tract. The project requires 194.07 acres of unavoidable wetland impact and 763 linear feet of intermittent stream impact for general site development and access roads, 1.58 acres of ditch impact for general site development and access roads, and 27.29 acres of wetland impact for rail access. Exhibits depicting the proposed site plan and associated jurisdictional area impacts are provided in Appendix C.

It is important to note that the transformation of the automobile industry from gas-powered to electric has dramatically impacted the design and size of automotive OEM facilities. Based on past RFP's from 2014-2021, the footprint of the typical OEM facility required to accommodate the processes for the production of a gas-powered automobile totaled roughly 1,000 acres with approximately 12MM square feet (275 acres) under roof. The footprint of this EVOEM campus required to accommodate the production processes for electric vehicles, such as the proposed project, totals 2,009 acres with approximately 28MM square feet (643 acres) under roof.

6.0 ALTERNATIVES ANALYSIS:

As part of the overall project, thorough alternatives analysis was completed. 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."

Following the guidelines above, an evaluation of the No Action Alternative, seven alternative sites including the preferred site, and three on-site configurations including the preferred on-site configuration was performed. As noted above, the proposed 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 configuration 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, site access, and other factors.
 - The project site must be within 60 minutes of an international airport.
 - The project site must be located within a reasonable commute distance of a diverse and skilled labor force of sufficient population to meet and sustain the production facility (~10,000+ jobs).
 - The project site must be contiguous and sufficiently sized to support the massive scale of an EVOEM assembly facility (which roughly translates to a minimum of ~2,100 acres of unencumbered land).
 - The project site must have sufficient developable area to support approximately 28MM sq ft. of EVOEM assembly facility and attendant features.
 - The project site must be fully entitled and free from encumbrances that could not be resolved or avoided on the strict project development timeline.
 - The project site must have or be capable of obtaining reliable and sustainable utility services to meet the needs of the EVOEM assembly facility; where utilities were not already available, the costs and timeline for providing the required service were considered in the screening criteria.
 - The project site requires uninterrupted and efficient access to the Nation's transportation and shipping infrastructure. Specifically, the project site needs to have immediate access to one or more Interstate Highways for large trucks and trailers and needs to have onsite (or reasonably attainable) rail infrastructure, and access to class-one rail. Access to shipping ports was equally critical, however, all sites evaluated were relatively similarly situated with respect to this criterion.
- Property can be reasonably obtained: The project site must be available or could be acquired specifically for development of an EVOEM. Consideration was given to the timeline and potential costs associated with obtaining the required parcel(s).
- Property can be reasonably expanded: The project site must be able to reasonably accommodate future expansion.
- Property can be reasonably managed: The project site cannot contain restrictions precluding operation or management of the site 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 alternatives 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 wetlands was the first alternative considered for this project. Due to the location of aquatic resources across the State and the size and scale of the EVOEM assembly facility (~28MM sq ft. of building footprint with attendant facilities and infrastructure), it was determined that complete avoidance of aquatic resource impacts was not feasible, even before the other myriad criteria were considered. Unlike more routine and smaller scale development activities, highly-specialized industrial developments of this scale do not allow much flexibility in facility design or layout. At this scale and complexity, assembly facility layout and design are inextricable from productive capacity and are further impacted by numerous design constraints (e.g., the need for efficient and safe production and product progression; materials proximity in required quantities for use in manufacture and assembly; the need to

provide for efficient and safe employee ingress/egress, on-site mobility, safety, and comfort; and the need to maintain security). These design constraints are further complicated, intertwined, and sometimes vague, because of the need for automotive OEM owners and operators to protect their proprietary processes. For these reasons, even minor modifications to the assembly facility footprints are often not feasible. The presence of wetlands and/or streams is not unique to the project site and impacts to these resources would be required regardless of site location within the state. Because the “no-action” alternative and complete avoidance of impacts prohibits construction of an EVOEM assembly facility, this alternative was determined to be unreasonable and not practicable.

6.3 Off-Site Alternatives & On-Site Configurations: Considering the site selection criteria, the GDEcD evaluated six alternative sites including the preferred site and four on-site configurations including the preferred design. Exhibits depicting off-site alternatives are provided in Appendix D and exhibits depicting on-site configurations are provided in Appendix E.

6.3.1 Preferred Site: The preferred alternative totals approximately 2,541.25 acres generally located adjacent to and east of Highway 280 and adjacent to and south of Interstate 16 within Bryan County, Georgia. Based on review of aerial photography, habitats are typical for undeveloped property within Bryan County. A description of habitats is provided above. The NWI, National Hydrography Dataset (NHD) and USGS maps depict 581.3 acres of wetland and 21,672 linear feet of stream. Portions of the property are 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) indicates 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), historic resources are present on the property and within the general vicinity on adjacent properties. The following provides a summary of each criterion reviewed for the preferred site:

- 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 reason:
 - This alternative is located within 60 minutes of Savannah/Hilton Head International Airport.
 - This alternative can provide a skilled labor force suitable to support and sustain the projected number of manufacturing and technology employees.
 - This alternative totals 2,541.25 acres of contiguous land which meets the minimum tract size requirement and provides logistics efficiency required for design and production.
 - This alternative does not contain any land use restrictions that prohibit construction of an EVOEM assembly facility.
 - This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).
 - This alternative is located adjacent to Interstate 16 with direct interstate access from Highway 280 and Class I railroad access can be reasonably brought to the site.
- This alternative can be reasonably obtained. The site is currently controlled by the JDA and has been identified as a regional mega-site by GDEcD.
- This alternative can accommodate both the initial and build out needs for the proposed assembly facility.
- 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 which is to construct an EVOEM facility.
- This alternative meets the overall project purpose to provide an entitled site which complies with all siting criteria and can support an approximately 28MM square foot (sf) EVOEM assembly facility.

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 1,693 acres and is located adjacent to and west of Highway 441 and south of Highway 49 within Baldwin County. Based on review of aerial photography, habitats are typical for undeveloped property within Baldwin County. The site contains agricultural field, managed pine plantation, forested slope wetland, streams and an open water pond. The site appears to consist of relatively mature timber. The NWI, NHD and USGS maps depict 93.1 acres of wetland and 34,522 linear feet of stream. Portions of the property are 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) indicates 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 historic resources are present on the property and within the general vicinity on adjacent properties. The following provides a summary of each criterion reviewed for this off-site alternative:

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is not capable of being done considering logistics. The following summarizes the criteria that are and are not met pertaining to logistics.
 - This alternative is not located within 60 minutes of an international airport. The closest international airport is Hartsfield-Jackson International Airport over 90 miles to the north of the site.
 - This alternative cannot meet the labor force requirements for this specific project.
 - This alternative totals 1,693 acres of contiguous land which does not meet the minimum tract size requirement and fails to provide logistics efficiency required for design and production.
 - This alternative does not contain any land use restrictions that prohibit construction of an EVOEM assembly facility.
 - This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).
 - This alternative is not located adjacent to a major interstate. Interstate 16 is over 30 miles west of the site. Class I rail service is adjacent to the site.
- This alternative can be reasonably obtained. The site is currently controlled by the Development Authority of the City of Milledgeville and Baldwin County and has been identified as a regional mega-site by GDEcD.
- This alternative cannot accommodate both the current and potential future expansion needs for the proposed assembly 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.
- This alternative meets the basic project purpose which is to construct an EVOEM facility.
- This alternative does not meet the overall project purpose to provide an entitled site which complies with all siting criteria and can support an approximately 28MM square foot (sf) EVOEM assembly facility.

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

6.3.3 Off-Site Alternative 2: This alternative totals approximately 1,758 acres located 5.5 miles west of Interstate 75, adjacent to and north of Highway 96, and east of Highway 49 in Peach County. Based on review of aerial photography, habitats are typical for agricultural property within Peach County. The site contains agricultural field, orchards, managed pine plantation, forested slope wetland, streams and an open water

pond. Aerial imagery documents timber harvesting has occurred on the property within the past 6 years. The NWI, NHD and USGS maps depict 11.6 acres of wetland and 6,532 linear feet of stream. Portions of the property are 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) indicates 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. The following provides a summary of each criterion reviewed for this off-site alternative:

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is not capable of being done considering logistics. The following summarizes the criteria that are and are not met pertaining to logistics.
 - This alternative is not located within 60 minutes of an international airport. The closest international airport is Hartsfield-Jackson International Airport over 90 miles to the north of the site.
 - This alternative cannot meet the labor force requirements for this specific project.
 - This alternative totals 1,758 acres of contiguous land which does not meet the minimum tract size requirement and does not provide logistics efficiency required for design and production.
 - This alternative contains a conservation easement on the western 200 acres of the site which prohibits construction of an EVOEM assembly facility.
 - This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).
 - This alternative is not located adjacent to a major interstate. Interstate 75 is 5.5 miles east of the site. Class I rail service is adjacent to the site.
- This alternative can be reasonably obtained. The site is currently controlled by the Development Authority of Peach County and has been identified as a regional mega-site by GDEcD.
- This alternative cannot accommodate both the current and potential future expansion needs for the proposed assembly facility due to the size of the site and restrictions associated with a conservation easement.
- This alternative cannot be reasonably managed and does contain restrictions precluding operation or management of the site for the intended use.
- This alternative does not meet the basic project purpose which is to construct an EVOEM assembly facility.
- This alternative does not meet the overall project purpose to provide an entitled site which complies with all siting criteria and can support an approximately 28MM square foot (sf) EVOEM assembly facility.

In summary, Off-Site Alternative 2 does not meet all site screening criteria and is therefore not a practicable alternative.

6.3.4 Off-Site Alternative 3: This alternative totals 2,360 acres located adjacent to and west of Interstate 75 and east of Highway 41 within Bartow County. Based on review of aerial photography, habitats are typical for undeveloped property within Bartow County. The site contains clear-cut upland, managed pine plantation, forested slope wetland, streams and an open water pond. Aerial imagery documents timber harvesting has occurred within several areas of the property within the past within the past 24 months. The NWI, NHD and USGS maps depict 82.6 acres of wetland and 19,566 linear feet of stream. Portions of the property are 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) indicates 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. The following provides a summary of each criterion reviewed for this off-site alternative:

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is not capable of being done considering logistics. The following summarizes the criteria that are and are not met pertaining to logistics.
 - This alternative is not located within 60 minutes of an international airport. The closest international airport is Hartsfield-Jackson International Airport over just over 60 miles to the north of the site.
 - This alternative can provide a skilled labor force suitable to support and sustain the projected number of manufacturing and technology employees.
 - This alternative totals 2,360 acres of contiguous land which does meet the minimum tract size requirement and provides logistics efficiency required for design and production.
 - This alternative does not contain any land use restrictions that prohibit construction of an EVOEM assembly facility.
 - This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).
 - This alternative is located adjacent to Interstate 75. Rail service is not located adjacent to the site and extension of rail access would require significant property acquisition, extension of over 2.3 miles of rail line, and construction of an overpass on Highway 41.
- This alternative can be reasonably obtained. The site is currently controlled by the Development Authority of Bartow County and has been identified as a regional mega-site by GDEcD.
- This alternative can accommodate both the current and potential future expansion needs for the proposed assembly 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.
- This alternative meets the basic project purpose which is to construct an EVOEM assembly facility.
- This alternative does not meet the overall project purpose to provide an entitled site which complies with all siting criteria and can support an approximately 28MM square foot (sf) EVOEM assembly facility.

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

6.3.5 Off-Site Alternative 4: This alternative totals 2,350 acres located adjacent to and east of Highway 19 within Clayton & Henry Counties. Based on review of aerial photography, habitats are typical for undeveloped property within Clayton & Henry Counties. The site contains clear-cut upland, managed pine plantation, forested slope wetland, streams and an open water pond. Aerial imagery documents timber harvesting has occurred within several areas of the property within the past two to three years. The NWI, NHD and USGS maps depict 97.6 acres of wetland and 57,569 linear feet of stream. Portions of the property are 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) indicates 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. The following provides a summary of each criterion reviewed for this off-site alternative:

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is not capable of being done considering logistics. The following summarizes the criteria that are and are not met pertaining to logistics.
 - This alternative is located within 60 minutes of an international airport. The closest international airport is Hartsfield-Jackson International Airport which is 12 miles to the north of the site.
 - This alternative totals 2,350 acres of contiguous land which meets the minimum tract size requirement and provides logistics efficiency required for design and production. The site is surrounded by existing residential development which creates logistics conflicts when accessing the site to and from Interstate 75.
 - This alternative does not contain any land use restrictions that prohibit construction of an EVOEM assembly facility.
 - This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).
 - This alternative is not located adjacent to a major interstate and the site is approximately 5 miles west of Interstate 75. The site is surrounded by existing residential development and the continuous traffic to access the site from Interstate 75 would conflict with the existing residential development. The site is located adjacent to a Class I railroad.
- This alternative can be reasonably obtained. The site is currently controlled by the Clayton County Water Authority.
- This alternative can accommodate both the current and potential future expansion needs for the proposed assembly facility.
- This alternative can be reasonably managed and does not contain restrictions precluding operation or management of the site for the intended use.
- This alternative does not meet the basic project purpose which is to construct an EVOEM assembly facility.
- This alternative does not meet the overall project purpose to provide an entitled site which complies with all siting criteria and can support an approximately 28MM square foot (sf) EVOEM assembly facility.

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

6.3.6 Off-Site Alternative 5: This alternative totals 3,826.26 acres located adjacent to and west of Highway 67 and south of Interstate 16 within Bulloch County. Based on review of aerial photography, habitats are typical for undeveloped property within Bulloch County. The site contains clear-cut upland, managed pine plantation, forested slope wetland, and streams. Aerial imagery documents timber harvesting has occurred within several areas of the property within the past two to three years. The NWI, NHD and USGS maps depict 1,272 acres of wetland and 41,802 linear feet of stream. Portions of the property are 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) indicates 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. The following provides a summary of each criterion reviewed for this off-site alternative:

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is not capable of being done considering logistics. The following summarizes the criteria that are and are not met pertaining to logistics.
 - This alternative is located within 60 minutes of Savannah/Hilton Head International Airport.
 - This alternative totals 3,862 acres of contiguous land which meets the minimum tract size requirement and provides logistics efficiency required for design and production.
 - This alternative contains land use restrictions that prohibit construction of an EVOEM assembly facility. The site contains a perpetual Natural Resources Conservation Easement that prohibits any development activities within the property.
 - This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).
 - This alternative is not located adjacent to a major interstate; however, the site is provided direct access to Interstate 16 located 4 miles north. The site is not located adjacent to a Class 1 railroad and extension of rail access would require property acquisition, extension of over 2 miles of rail line, and construction of an overpass on Highway 280.
- The property is privately owned and it is assumed that this alternative can be reasonably obtained.
- Due to the conservation easement, this alternative cannot accommodate both the current and potential future expansion needs for the proposed assembly facility.
- This alternative cannot be reasonably managed and contains restrictions precluding operation or management of the site for the intended use.
- This alternative does not meet the basic project purpose which is to construct an EVOEM facility.
- This alternative does not meet the overall project purpose to provide an entitled site which complies with all siting criteria and can support an approximately 28MM square foot (sf) EVOEM assembly facility.

In summary, Off-Site Alternative 5 does not meet all site screening criteria and is therefore not a practicable alternative.

6.3.7 Off-Site Alternative 6: This alternative totals 631 acres located adjacent to and east Old River Road and north of John Carter Road within Chatham County. Based on review of aerial photography, habitats are typical for undeveloped property within Chatham County. The site contains cleared and graded upland developed as pad ready sites, forested slope wetland, and storm water ponds. Aerial imagery documents that development activities have occurred within the site over the past 5 years. The NWI, NHD and USGS maps depict 192.3 acres of wetland and 17,286 linear feet of stream. Portions of the property are 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) indicates 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. The following provides a summary of each criterion reviewed for this off-site alternative:

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is not capable of being done considering logistics. The following summarizes the criteria that are and are not met pertaining to logistics.

- This alternative is located within 30 minutes of Savannah/Hilton Head International Airport.
 - This alternative totals 631 acres of contiguous land which does not meet the minimum tract size requirement.
 - This alternative does not contain any land use restrictions that prohibit construction of an EVOEM assembly facility.
 - This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).
 - This alternative is located adjacent to a major interstate and the primary access is located 2 miles from the interstate from Old River Road. The site does not afford rail access.
- This alternative can be reasonably obtained. The site is currently controlled by the Savannah Economic Development Authority.
 - This alternative cannot accommodate both the current and potential future expansion needs for the proposed assembly facility.
 - This alternative can be reasonably managed and does not contain restrictions precluding operation or management of the site for the intended use.
 - This alternative does not meet the basic project purpose which is to construct an EVOEM assembly facility.
 - This alternative does not meet the overall project purpose to provide an entitled site which complies with all siting criteria and can support an approximately 28MM square foot (sf) EVOEM assembly facility.

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

6.3.8 Off-Site Alternative 7: This alternative totals 1,490 acres located adjacent to and east of Old River Road and north of Interstate 16 within Effingham County. Based on review of aerial photography, habitats are typical for undeveloped property within Effingham County. The site contains clear-cut upland, managed pine plantation, forested slope wetland, and streams. Aerial imagery documents timber harvesting has occurred within several areas of the property within the past two to three years. The NWI, NHD and USGS maps depict 742.9 acres of wetland and 7,618 linear feet of stream. Portions of the property are 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) indicates 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 however historic sites are present to the north of the tract within the town of Meldrim. The following provides a summary of each criterion reviewed for this off-site alternative:

- This alternative is capable of being done considering total cost, funding source, etc.
- This alternative is not capable of being done considering logistics. The following summarizes the criteria that are and are not met pertaining to logistics.
 - This alternative is located within 30 minutes of Savannah/Hilton Head International Airport.
 - This alternative totals 1,490 acres of contiguous land which does not meet the minimum tract size requirement.
 - This alternative does not contain any land use restrictions that prohibit construction of an EVOEM assembly facility.

- This alternative currently contains utility services or access to utility services can be extended to the site (water, sewer, electrical, gas, phone, cable, etc.).
 - This alternative is located adjacent to a major interstate and access is provided to Interstate 16 from Old River Road. This site does afford rail access.
- This alternative can be reasonably obtained. The site is currently controlled by the Effingham County Development Authority.
 - This alternative cannot accommodate the current nor potential future expansion needs for the proposed assembly facility.
 - This alternative can be reasonably managed and does not contain restrictions precluding operation or management of the site for the intended use.
 - This alternative does not meet the basic project purpose which is to construct an EVOEM assembly facility.
 - This alternative does not meet the overall project purpose to provide an entitled site which complies with all siting criteria and can support an approximately 28MM square foot (sf) EVOEM assembly facility.

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

6.4 On-Site Configurations: In addition to considering off-site alternatives, on-site configurations were evaluated. The description of various components required to support and sustain the overall assembly facility operation provided in Section 5.0 above are applicable to all on-site configurations. Since each of these components must exist for the production of the vehicles, omitting the paint building or the fabrication building (as an example) to reduce the overall footprint is not feasible. However, a detailed review of the proposed site plan and shift, redesign, and/or downsize certain features of the facility were implemented for alternatives analysis. Specifically, four on-site configurations were drafted and studied to avoid or minimize impacts to wetlands and waters identified within the property.

6.4.1 Preferred On-Site Configuration: The preferred on-site configuration includes vehicle access from Highway 280 on the western portion of the tract south of the Interstate 16/Highway 280 interchange. The rail component for this configuration extends into the site from the existing rail line on the eastern property boundary. The assembly facility layout generally includes production to the east/west, railyard to the northeast and vehicle storage to the south. Because the applicants Preferred On-Site Configuration contains all the required components of the project, this alternative met the site screening criteria and is therefore a practicable alternative.

6.4.2 On-Site Configuration 1: The on-site configuration includes vehicle access from Highway 280 on the western portion of the tract south of the Interstate 16/Highway 280 interchange. The rail component for this configuration extends into the site from the existing rail line on the eastern property boundary north and extends in an east/west direction adjacent to Interstate 16. The assembly facility layout generally includes production to the east/west and vehicle storage to the south. Because On-Site Configuration 1 contains all the required components of the project, this alternative met the site screening criteria and is therefore a practicable alternative.

6.4.3 On-site Configuration 2: This on-site configuration includes vehicle access from Highway 280 on the western portion of the tract south of the Interstate 16/Highway 280 interchange. The rail component for this configuration extends into the site from the existing rail line on the eastern property boundary and is located in the center of the project area. The assembly facility layout generally includes production to the east/west. This configuration is similar to the preferred alternative but shifts the southern portion of the assembly facility further west. On-Site

Configuration 2 contains all the required components of the project, this alternative met the site screening criteria and is therefore a practicable alternative.

6.5 Alternatives Not Practicable or Reasonable: Following review of both off site alternatives and on-site configurations, a comparison of alternatives was completed to determine practicability and reasonability. Table 2 below summarizes a comparison of each alternative discussed above to the screening criteria for practicability and reasonableness.

Table 2. Summary of Alternative Site Practicability and Reasonability

Practicability/ Reasonability Screening Selection Criteria	Applicants Preferred Alt	Off-Site Alt 1	Off-Site Alt 2	Off-Site Alt 3	Off-Site Alt 4	Off-Site Alt 5	Off-Site Alt 6	Off-Site Alt 7	On-Site Alt 1	On-Site Alt 2	No Action
Capable of being done considering cost	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Capable of being done considering logistics	Yes	No	No	No	No	No	No	No	Yes	Yes	No
Property can be reasonably obtained	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Property can be reasonably expanded	Yes	No	No	Yes	Yes	No	No	No	Yes	Yes	No
Property can be reasonably managed	Yes	Yes	No	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes
Meets basic project purpose	Yes	Yes	No	Yes	No	No	No	No	Yes	Yes	No
Meets overall project purpose	Yes	No	No	No	No	No	No	No	Yes	Yes	No
Practicable (Y or N)	Yes	No	No	No	No	No	No	No	Yes	Yes	No

6.6 Review of Practicable Alternatives:

Following a determination of practicable alternatives using the “Practicability/Reasonability Screening Selection Criteria”, an analysis of practicable alternatives to identify the least environmentally damaging practicable alternative pursuant to 40 CFR 230.7(b)(1) was completed. 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 potential environmental impacts that would result from construction of the proposed assembly facility were evaluated. This evaluation was completed by considering environmental factors which could impact development of the site. The environmental factors included:

Environmental Factors:

- Stream Impacts (quantitative). The estimated linear footage of potential stream impact was evaluated for each practicable alternative.
- Stream Impacts (qualitative). The functional value of potential stream impact areas was evaluated for each practicable alternative. A low, medium, or high value was assigned using the *Savannah District's Standard Operating Procedure (SOP) For Compensatory Mitigation (Version 2.0) Coastal Plain Qualitative Stream Assessment Worksheet*.
- 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) Non-Riverine Wetland Qualitative Stream Assessment Worksheet*.
- Impacts to Other Waters (quantitative). The acreage of open water impact for each site was considered during review of each practicable alternative.
- Other Waters Functions (qualitative). The functional value of any open water impact areas was evaluated for each practicable alternative. A low, medium, or high value was assigned based on habitat type and condition. Examples of high value would be lakes, impoundments, and/or features occurring naturally. Examples of low value would be man-made features which have not naturalized and provide little to no biological support (i.e. borrow pit).
- Federally Listed Threatened or Endangered Species. A preliminary assessment of each practicable alternative was conducted to determine the potential occurrence of animal and plants species (or their preferred habitats) currently listed as threatened or endangered by state and federal regulations [Federal Endangered Species Act of 1973 (16 USC 1531-1543)]. The U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Conservation System (IPaC) database at <http://ecos.fws.gov/ipac/> database was reviewed to determine plant and animal species as endangered or threatened for each alternative.
- Cultural Resources. A preliminary assessment of cultural resources was conducted for each site by information publicly available on GNAHRGIS database. Potential impacts to sites listed or eligible for listing on the National Register of Historic Places was noted for each alternative.

Considering the assessment criteria above, only the three alternative on-site configurations were reviewed. The following provides a summary of each practicable alternative and associated environmental impacts.

6.6.1 Proposed Action/Preferred Alternative/On-site Configuration: A summary of environmental impacts associated with Proposed Action/Preferred Alternative/On-site Configuration is provided below.

- Stream Impacts (quantitative). Based on the location of aquatic resources and assembly facility design this on-site configuration requires 763 linear feet of intermittent stream impact.
- Stream Impacts (qualitative). An evaluation of each tributary (perennial, intermittent and ephemeral streams) and each specific impact was completed using the *Savannah District's Standard Operating Procedure (SOP) For Compensatory Mitigation (Version 2.0) Coastal Plain Qualitative Stream Assessment Worksheet*. Based on this assessment and by assessing the five functions (hydrology, hydraulics, geomorphology, chemistry and biology), the stream qualitative functional capacity score was determined to be moderate.
- Wetland Impacts (quantitative). Based on the location of aquatic resources and assembly facility design, this on-site configuration requires 222.34 acres of wetland impact.
- 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). This alternative requires impacts to 1.58 acres of man-made drainage ditch.
- Other Waters Functions (qualitative). The ditches consisted of a highly entrenched conveyance system that was constructed for stormwater management purposes. The functional value of this feature is low.
- Federally Listed Threatened or Endangered Species. An intensive threatened and endangered species survey has been completed within the project site. A completed copy of the report of findings is attached to this permit application package and no impacts to federally listed threatened or endangered species are anticipated.
- Cultural Resources. Brockington & Associates has completed a field survey for cultural resources and archeology and a draft report is currently being prepared for submittal to and review by the USACE and GADNR-HPD. Upon completion, a copy will be provided to the USACE for agency review. Based on review of GNAHRGIS database, the project will not impact sites listed on the NRHP.
- Stream Buffer Impact. The proposed project will require impacts to state waters and stream buffers. A stream buffer variance will be obtained from the GADNR-EPD prior to initiation of buffer impacts.

6.6.2 On-Site Configuration 1: A summary of environmental impacts associated with On-Site Configuration 1 is provided below.

- Stream Impacts (quantitative). Based on the location of aquatic resources and assembly facility design this on-site configuration requires 763 linear feet of intermittent stream impact.
- Stream Impacts (qualitative). An evaluation of each tributary (perennial, intermittent and ephemeral streams) and each specific impact was completed using the *Savannah District's Standard Operating Procedure (SOP) For Compensatory Mitigation (Version 2.0) Coastal Plain Qualitative Stream Assessment Worksheet*. Based on this assessment and by assessing the five functions (hydrology, hydraulics, geomorphology, chemistry and biology), the stream qualitative functional capacity score was determined to be moderate.
- Wetland Impacts (quantitative). Based on the location of aquatic resources and assembly facility design, this on-site configuration requires 249.14 acres of wetland impact.
- 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). This alternative requires 6.51 acres of impact to a jurisdictional man-made open water pond and 1.58 acres of impact to man-made drainage ditch.
- Other Waters Functions (qualitative). The open water pond within the property is consists of deep open water aquatic habitat with herbaceous vegetation along the water's edge. The ditch consisted of a highly entrenched conveyance system that was constructed for stormwater management purposes. The functional value of both features is low.

- Federally Listed Threatened or Endangered Species. An intensive threatened and endangered species survey has been completed within the project site. A completed copy of the report of findings is attached to this permit application package and no impacts to federally listed threatened or endangered species are anticipated.
- Cultural Resources. Brockington & Associates has completed a field survey for cultural resources and archeology and a draft report is currently being prepared for submittal to and review by the USACE and GADNR-HPD. Upon completion, a copy will be provided to the USACE for agency review. Based on review of GNAHRGIS database, the project will not impact sites listed on the NRHP.
- Stream Buffer Impact. The proposed project will require impacts to state waters and stream buffers. A stream buffer variance will be obtained from the GADNR-EPD prior to initiation of buffer impacts.

6.6.3 On-Site Configuration 2: A summary of environmental impacts associated with On-Site Configuration 2 is provided below.

- Stream Impacts (quantitative). Based on the location of aquatic resources and assembly facility design this on-site configuration requires 763 linear feet of intermittent stream impact.
- Stream Impacts (qualitative). An evaluation of each tributary (perennial, intermittent and ephemeral streams) and each specific impact was completed using the *Savannah District's Standard Operating Procedure (SOP) For Compensatory Mitigation (Version 2.0) Coastal Plain Qualitative Stream Assessment Worksheet*. Based on this assessment and by assessing the five functions (hydrology, hydraulics, geomorphology, chemistry and biology), the stream qualitative functional capacity score was determined to be moderate.
- Wetland Impacts (quantitative). Based on the location of aquatic resources and assembly facility design, this on-site configuration requires 418.64 acres of wetland impact.
- 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). This alternative requires 6.51 acres of impact to a jurisdictional man-made open water pond and 1.58 acres of impact to man-made drainage ditch.
- Other Waters Functions (qualitative). The open water pond within the property is consists of deep open water aquatic habitat with herbaceous vegetation along the water's edge. The ditch consisted of a highly entrenched conveyance system that was constructed for stormwater management purposes. The functional value of both features is low.
- Federally Listed Threatened or Endangered Species. An intensive threatened and endangered species survey has been completed within the project site. A completed copy of the report of findings is attached to this permit application package and no impacts to federally listed threatened or endangered species are anticipated.
- Cultural Resources. Brockington & Associates has completed a field survey for cultural resources and archeology and a draft report is currently being prepared for submittal to and review by the USACE

and GADNR-HPD. Upon completion, a copy will be provided to the USACE for agency review. Based on review of GNAHRGIS database, the project will not impact sites listed on the NRHP.

- Stream Buffer Impact. The proposed project will require impacts to state waters and stream buffers. A stream buffer variance will be obtained from the GADNR-EPD prior to initiation of buffer impacts.

6.6.4 Summary of Practicable Alternatives Analysis: When comparing the practicable alternatives, the Preferred Alternative requires less wetland and open water impact than alternative sites and when considering environmental impacts, the 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

FACTORS	Preferred Alternative & Configuration	On-Site Conf 1	On-Site Conf 2
Environmental Factors			
Stream Impacts (Linear Feet)	763	763	763
Functional Value of Impacted Stream	Moderate	Moderate	Moderate
Wetland Impacts (Acres)	220.76	249.14	418.64
Functional Value of Impacted Wetland	Moderate	Moderate	Moderate
Impacts to Other Waters (Acres)	1.58	6.51	6.51
Functional Value of Impacted Other Waters	Low	Low	Low
Federal Endangered Species Impact	No	No	No
Cultural Resources Impact	No	No	No
LEDPA	Yes	No	No

In summary, the 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 design team 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:

The project area was assessed in consideration of the Endangered Species Act of 1973. Pedestrian surveys were conducted to identify protected individuals and/or potential habitat for protected individuals within the study area on numerous occasions; during February and March 2015, May 2018, and May 2022. Species-specific surveys were conducted for the species with a preferred habitat similar to those found within the study area. Table 4 depicts federally protected species listed in the study area that have potential ranges within Bryan County, Georgia based on the Information for Planning and Consultation (IPaC) database query. This table also provides biological determinations based on the effects that a potential EVOEM development would have on each of these species. Section II-A of this document provides a detailed description of those listed species that have preferred habitat found within the study area.

Table 4. Known Occurrences and Biological Determination for Protected Species Listed in Bryan County

Class	Scientific Name	Common Name	IPaC Trust Resources List	Legal Status*		Habitat Present	Species Present	Biological Determination
				Federal	State			
Amphibians	<i>Ambystoma cingulatum</i>	Frosted flatwoods salamander	Yes	T	T	Yes	No	No Impact
Birds	<i>Laterallus jamaicensis</i>	Eastern Black Rail	Yes	T	T	None	No	No impact
	<i>Mycteria americana</i>	Wood Stock	Yes	T	T	Yes	No	NLAA
Reptiles	<i>Drymarchon couperi</i>	Eastern Indigo Snake	Yes	T	T	Preferred	None observed	NLAA
	<i>Gopherus polyphemus</i>	Gopher Tortoise	Yes	C	T	Preferred	Yes	NLAA
Insects	<i>Danaus plexippus</i>	Monarch Butterfly	Yes	C	N/A	None	No	No impact

At no time during the survey was a species listed as threatened or endangered by current federal regulations observed. It was determined that marginal habitat was present in the study area that could potentially harbor flatwoods salamanders, wood stork, indigo snakes, and gopher tortoise. Site-specific studies were conducted for these species, and only gopher tortoises are known to inhabit the study area. The applicant has undertaken a voluntary relocation effort for the gopher tortoises. Gopher tortoises were relocated through a coordination effort with the GADNR to Fort Stewart. Thus, the proposed development within this study area will not adversely affect any species listed as federally threatened or endangered in Bryan County, Georgia. A complete copy of the May 2022 report is provided in Appendix G.

8.0 CULTURAL RESOURCES:

Brockington & Associates completed a Phase I survey for portions of the project area in 2015 and 2018. A survey for the remaining area within the project site, not included in the past survey efforts, has been initiated. Following completion of the field survey, a complete report including a NHRP eligible resource assessment of effects, will be submitted to the USACE and GADNR-HPD for review and concurrence. A copy of the previous survey documentation is provided in Appendix H.

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, 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.

10.0 COMPENSATORY MITIGATION

The proposed project requires impacts to 221.36 acres jurisdictional wetland, 1.58 acres of ditch and 763 linear feet of stream. As documented in the attached mitigation credit calculations (Appendix F), the project will require 1,328.24 legacy (166.03 2018 SOP) wetland mitigation credits to offset jurisdictional wetland impacts and 4,120.20 legacy (572.25 2018 SOP) stream credits to offset stream impacts. As compensatory mitigation, the applicant is proposing to purchase the 4,120.20 legacy stream credits from Yam Grandy Mitigation Bank and satisfy the 1,328.24 legacy (166.08 2018 SOP) wetland mitigation credit requirement through the Savannah District In-Lieu Fee Program.

11.0 CONCLUSION

GDEcD and the JDA are proposing the development of an approximately 2,541.25-acre tract located adjacent to and east of Highway 280 and adjacent to and south of Interstate 16 within Bryan County, Georgia for an EVOEM assembly facility. Assembly facility layout was dictated by a variety of design considerations including topography, aquatic resources, the advanced principles of innovative production of electric vehicles, as well as logistics and

operational requirements for material flow and positioning during the production process. As depicted in the attached permit drawings, the proposed site plan includes development of 2,009.9 acres within the 2,541.25-acre tract. The project requires 194.07 acres of wetland impact and 763 linear feet of intermittent stream impact for general site development and access roads, 1.58 acres of ditch impact for general site development and access roads, and 27.29 acres of wetland impact for rail access. As compensatory mitigation, the applicant is proposing to purchase the 4,120.20 legacy stream credits from Yam Grandy Mitigation Bank and satisfy the 1,328.24 legacy (166.03 2018 SOP) wetland mitigation credit requirement through the Savannah District In-Lieu Fee Program. This project has been determined to be the least environmentally damaging practicable alternative and unavoidable wetland and stream impacts will be offset through purchase of mitigation credits. Best management practices will be employed during site development to further minimize impacts within the project area.



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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.

Georgia Department of Economic Development
 Attn: Mr. Pat Wilson - Commissioner
 Technology Square, 75 5th Street N.W. Suite 1200
 Atlanta, Georgia 30308
 1-404-962-4000

Savannah Harbor-Interstate 16 Joint
 Development Authority
 Attn: Mr. Hugh "Trip" Tollison - Secretary
 906 Drayton Street
 Savannah, Georgia 31401
 912.447.8450

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

Lat. 31.164165° Long. -81.450411°

<u>Bryan</u>		
County	Military District	In City or Town
<u>Ellabell</u>		
Near City or Town	Subdivision	Lot No.
Lot Size	Approximate Elevation of Lot	Georgia State
Name of Waterway	Black 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 Construction of EVOEM Manufacturing Facility

- 1. Access channel : length _____ depth _____ width _____
- 2. Boat basin : length _____ depth _____ width _____
- 3. Fill area : see attached length _____ depth _____ width _____
- 4. Other: Excavation Area: length _____ depth _____ width _____

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

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

Backfill required: Yes _____ No _____ Cubic yards _____

Where obtained _____

C. Excavated material :

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

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

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

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

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

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

A. Please submit the following:

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

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

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

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

5. Plan and profile drawings showing limits of areas to be dredged, areas to be used for placement of spoil, locations of any dikes to be constructed showing locations of any

weir(s), and typical cross sections of the dikes.

B. Please provide the following statements:

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

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

Pat Wilson

Signature of Applicant/Date

Hugh "Tripp" Tollison

Signature of Applicant/Date

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.

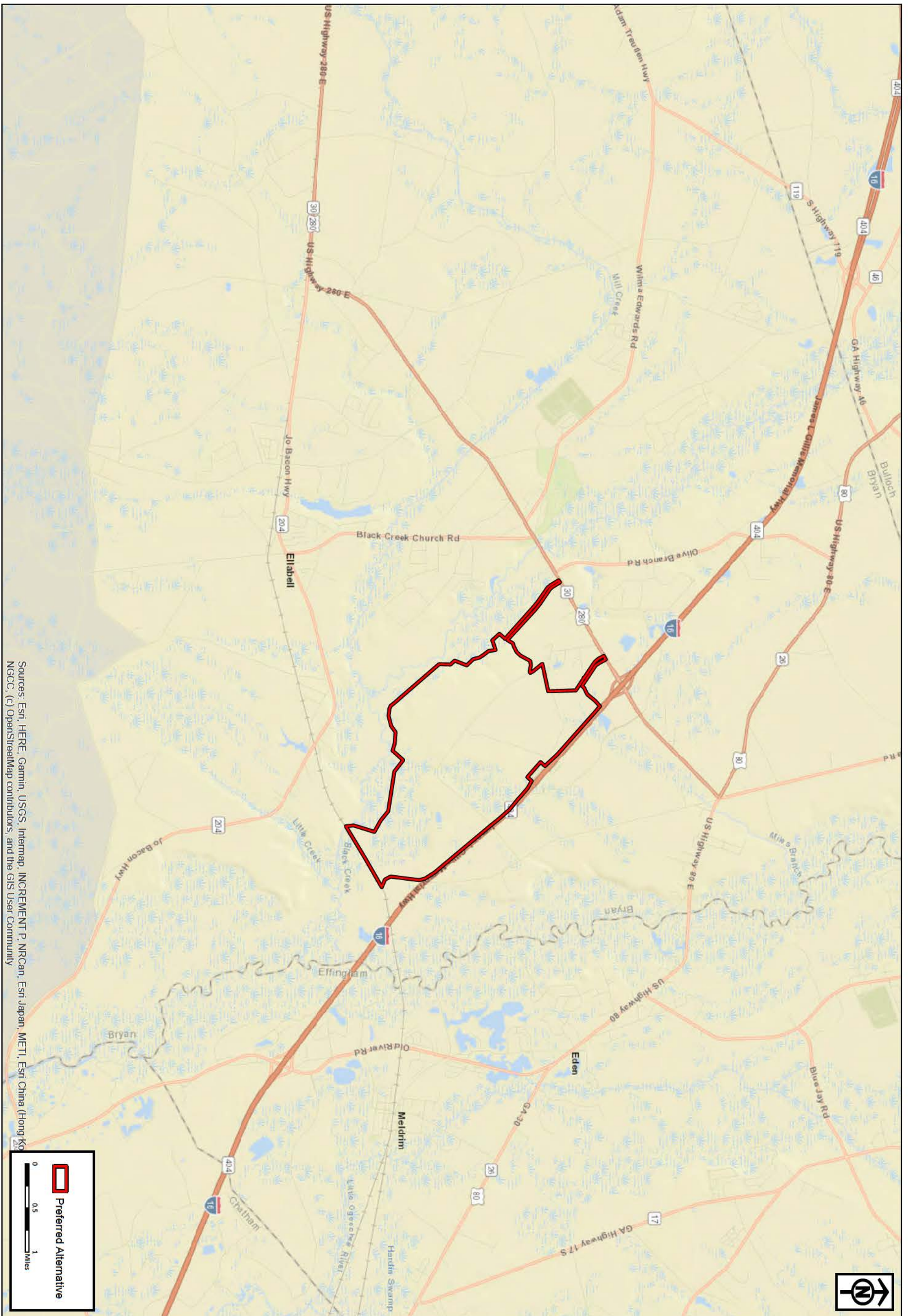
SUPPORTING REMARKS:

See Attached.





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APPENDIX B: Figures/Site Maps



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, DeLorme, NAVTEQ, and the GIS User Community

 Preferred Alternative


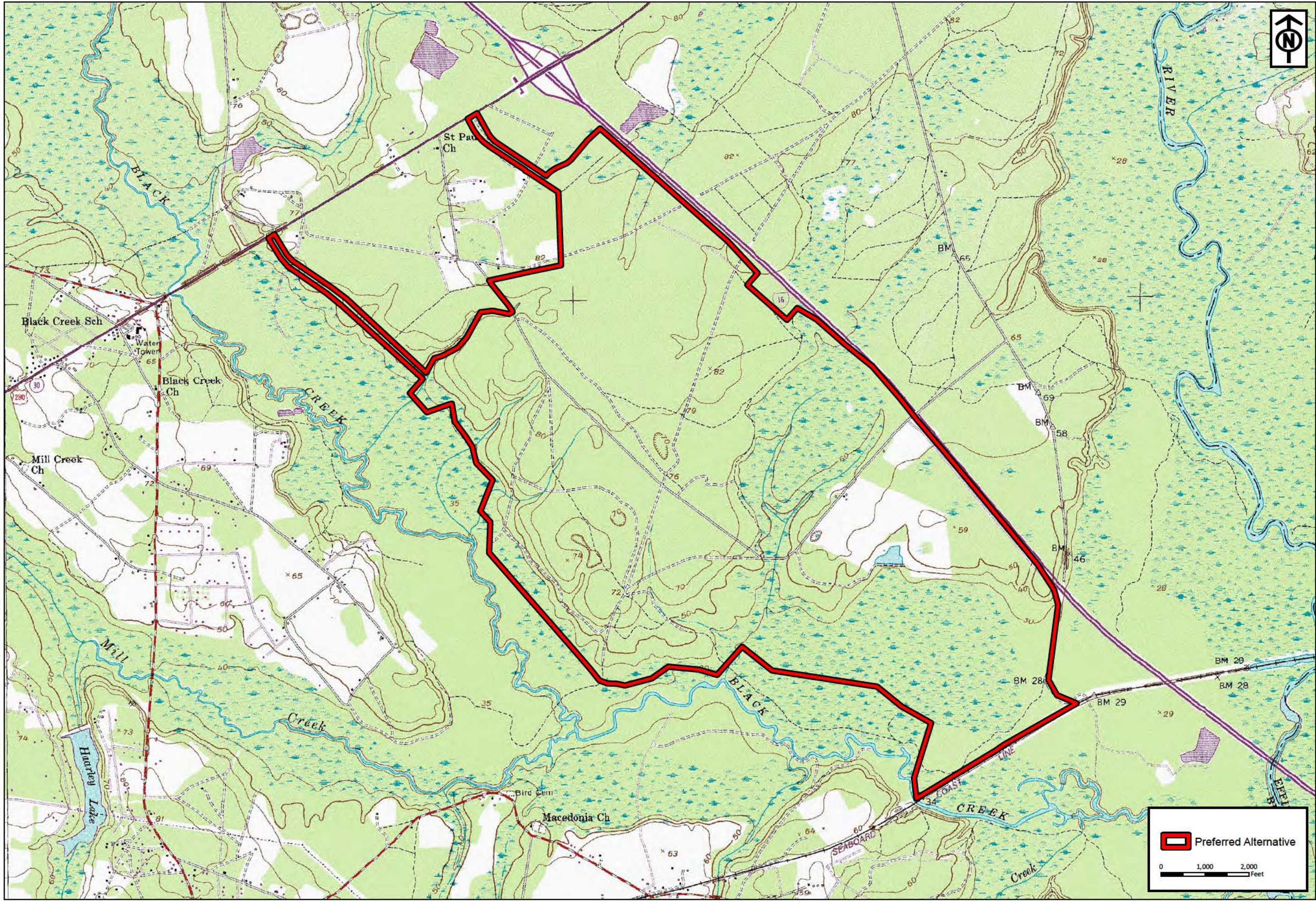


RLC Project No.:	14-225.7
Figure No.:	1
Prepared By:	RP
Sketch Date:	5/12/2022
Map Scale :	1 inch = 1 miles

Applicant's Preferred Alternative
 Bryan County, Georgia

Project Location Map
 Prepared For: GDEcD & Savannah Harbor-
 Interstate 16 Corridor Joint Development Authority


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



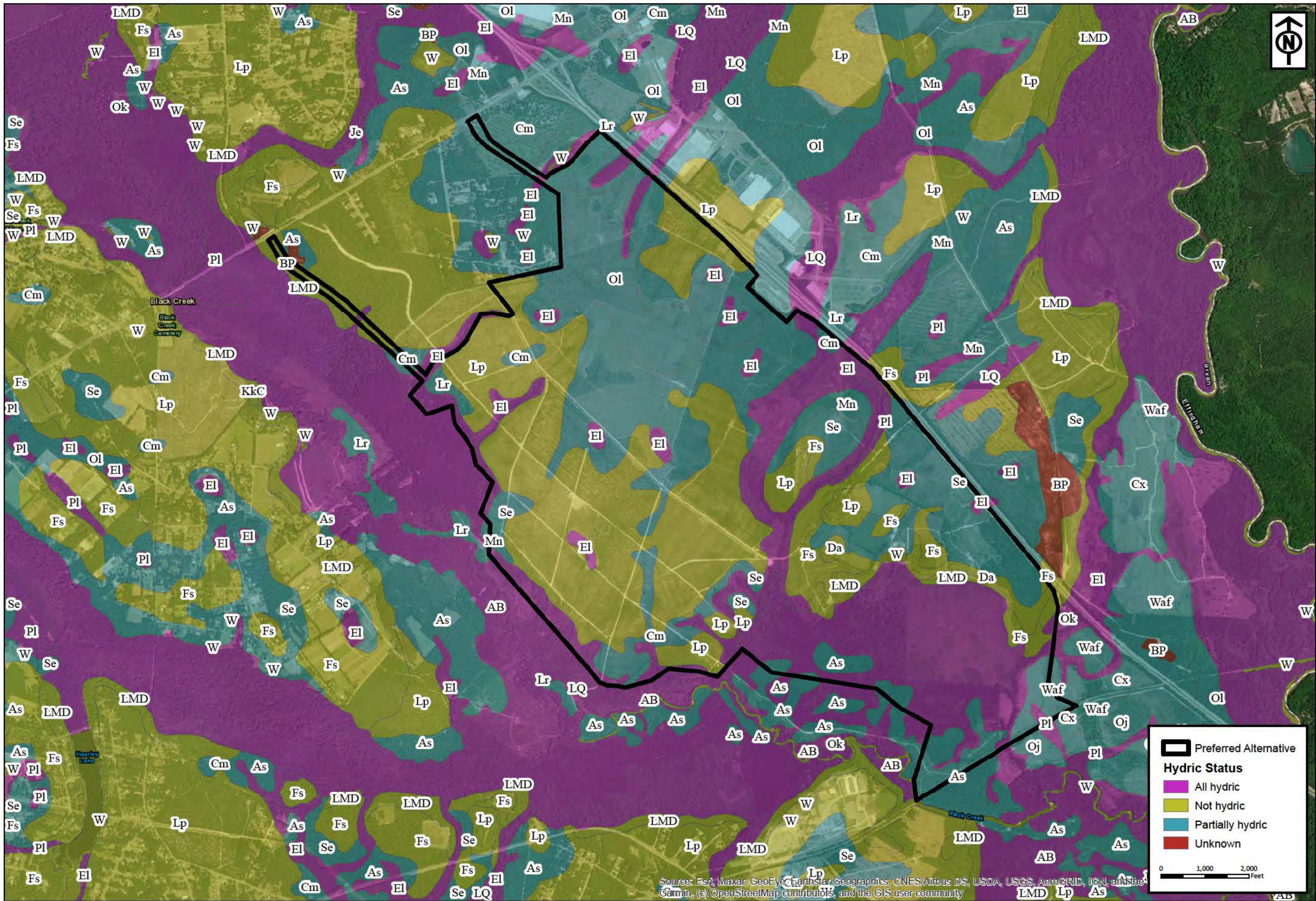
**RESOURCE+LAND
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41 Park of Commerce Way, Ste 101
Savannah, GA 31405
tel: 912.443.5896 fax: 912.443.5898



USGS Topographic Survey
Prepared For: GDECD & Savannah Harbor-
Interstate 16 Corridor Joint Development Authority

**Applicant's Preferred
Alternative**
Bryan County, Georgia

RLC Project No.:	14-225.7
Figure No.:	2
Prepared By:	RP
Sketch Date:	5/13/2022
Map Scale:	1 inch = 2,000 feet



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the Garmin, (c) OpenStreetMap contributors, and the GIS user community

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Savannah, GA, 31405
tel: 912.443.5896 fax: 912.443.5898



USDA Soil Survey


Prepared For: GDECD & Savannah Harbor-
Interstate 16 Corridor Joint Development Authority

**Applicant's Preferred
Alternative**

Bryan County, Georgia

RLC Project No.:	14-225.7
Figure No.:	3
Prepared By:	RP
Sketch Date:	5/13/2022
Map Scale:	1 inch = 2,000 feet



 Preferred Alternative
 0 1,000 2,000 feet



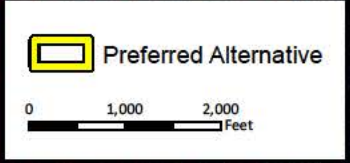
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Figure No.:	5
Prepared By:	RP
Sketch Date:	5/13/2022
Map Scale :	1 inch = 2,000 feet

Applicant's Preferred Alternative
 Bryan County, Georgia

2019 Color Ortho Photograph
 Prepared For: GDEcD & Savannah Harbor-
 Interstate 16 Corridor Joint Development Authority


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 Savannah, GA 31405
 tel 912.443.5896 fax 912.443.5898

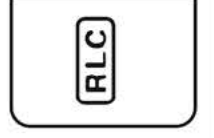
Source(s) 2018 NAIP Ortho Aerial, Chatham County



RLC Project No.: 14-225.7
 Figure No.: 6
 Prepared By: RP
 Sketch Date: 5/13/2022
 Map Scale: 1 inch = 2,000 feet

Applicant's Preferred Alternative
 Bryan County, Georgia

1999 Color Infrared Photograph
 Prepared For: GDEcD & Savannah Harbor-
 Interstate 16 Corridor Joint Development Authority

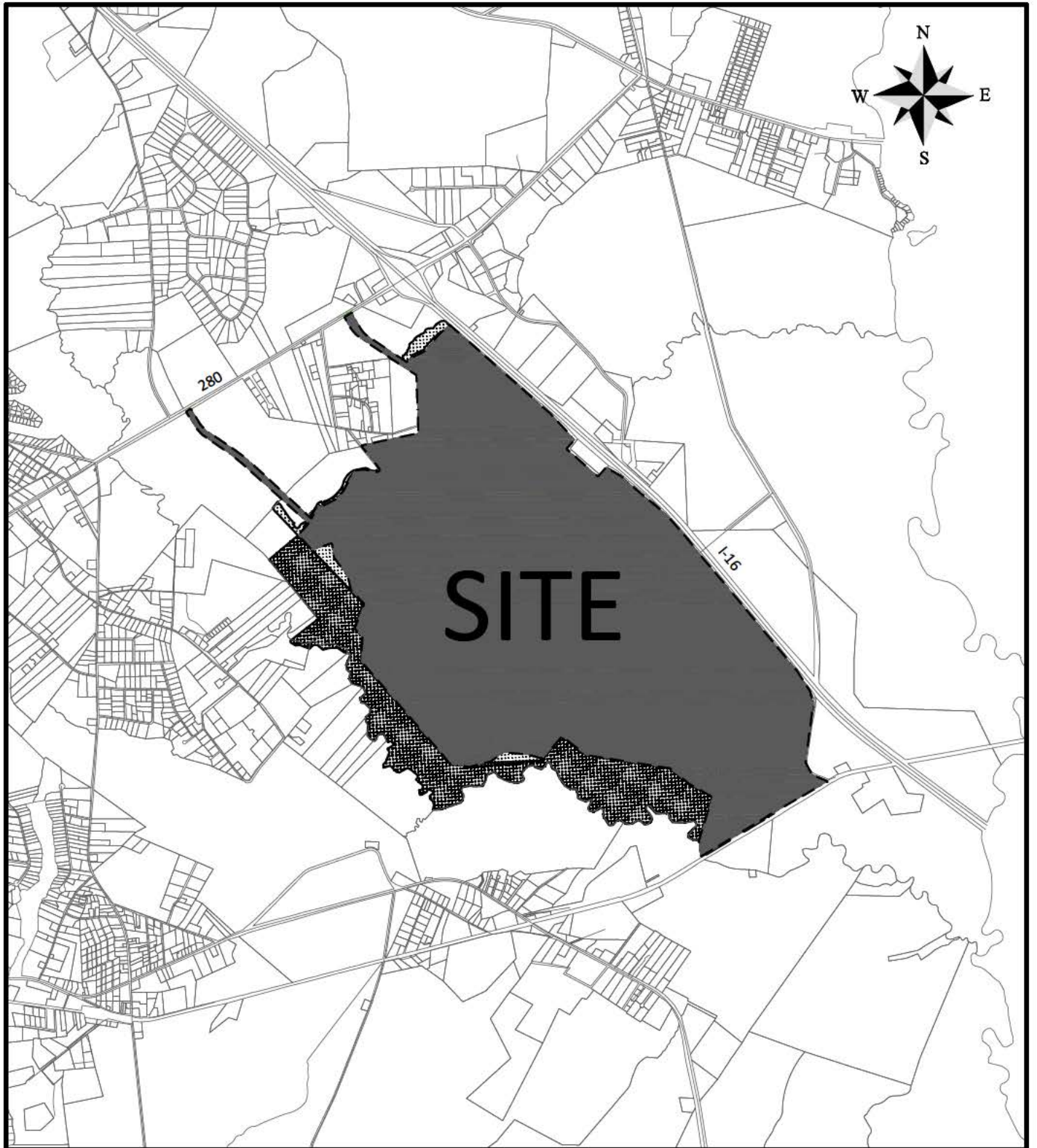


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APPENDIX C: Permit Drawings



BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
LOCATION MAP

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 1 OF 18
SCALE: 1" = 4000'




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Savannah, GA 31405 • 912.234.5300

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LEGEND

ACREAGE SUMMARY TABLE

	TOTAL PROJECT ACREAGE	2,541.25 AC
	TOTAL JURISDICTIONAL WETLAND AREA	625.98 AC.
	TOTAL NON-JURISDICTIONAL WETLAND AREA	29.32 AC.
	TOTAL FRESHWATER POND AREA	6.51 AC.
	TOTAL STREAM LENGTH	763 LF
	TOTAL DUG CONVEYANCE	1.58 AC
	TOTAL UPLAND AREA	1,877.86 AC.

WETLAND IMPACTS

JURISDICTIONAL WETLANDS IMPACTS

	RAIL ROAD IMPACT	27.29 AC.
	SITE IMPACT	194.07 AC.
	DUG CONVEYANCE IMPACT	1.58 AC.
<hr/>		
	TOTAL JURISDICTIONAL WETLAND IMPACTS	222.34 AC.

	STREAM IMPACT	763 LF
---	---------------	--------

NON-JURISDICTIONAL WETLANDS IMPACTS

	SITE IMPACT	29.32 AC.
<hr/>		
	TOTAL NON-JURISDICTIONAL WETLAND IMPACTS	29.32 AC.

BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:

LEGEND

CLIENT:

SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

LOCATION: BRYAN COUNTY, GEORGIA

DATE: MAY 11, 2022

JOB NUMBER: J - 25503

SHEET: 2 OF 18

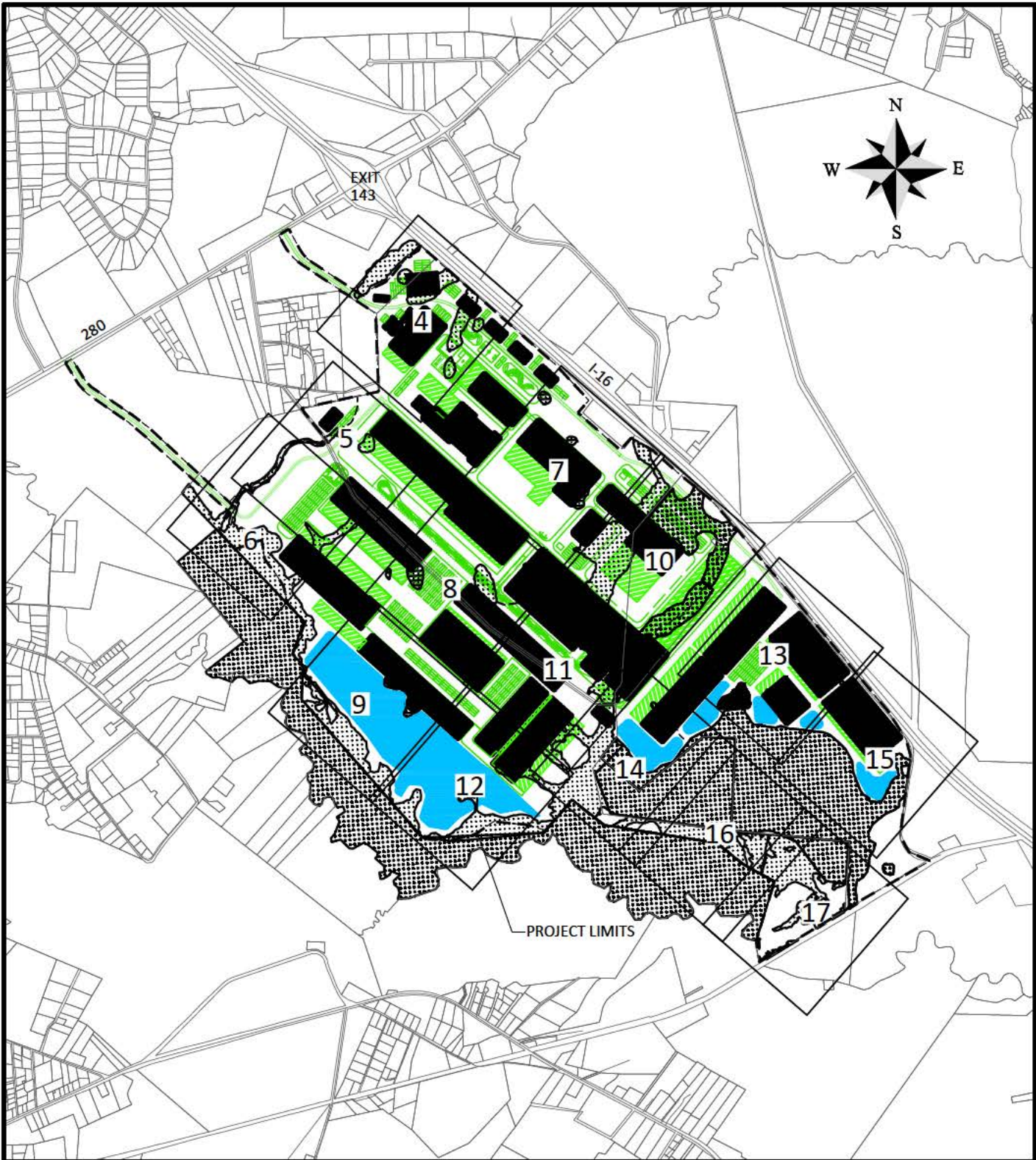
SCALE: N.T.S.

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
SHEET INDEX

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

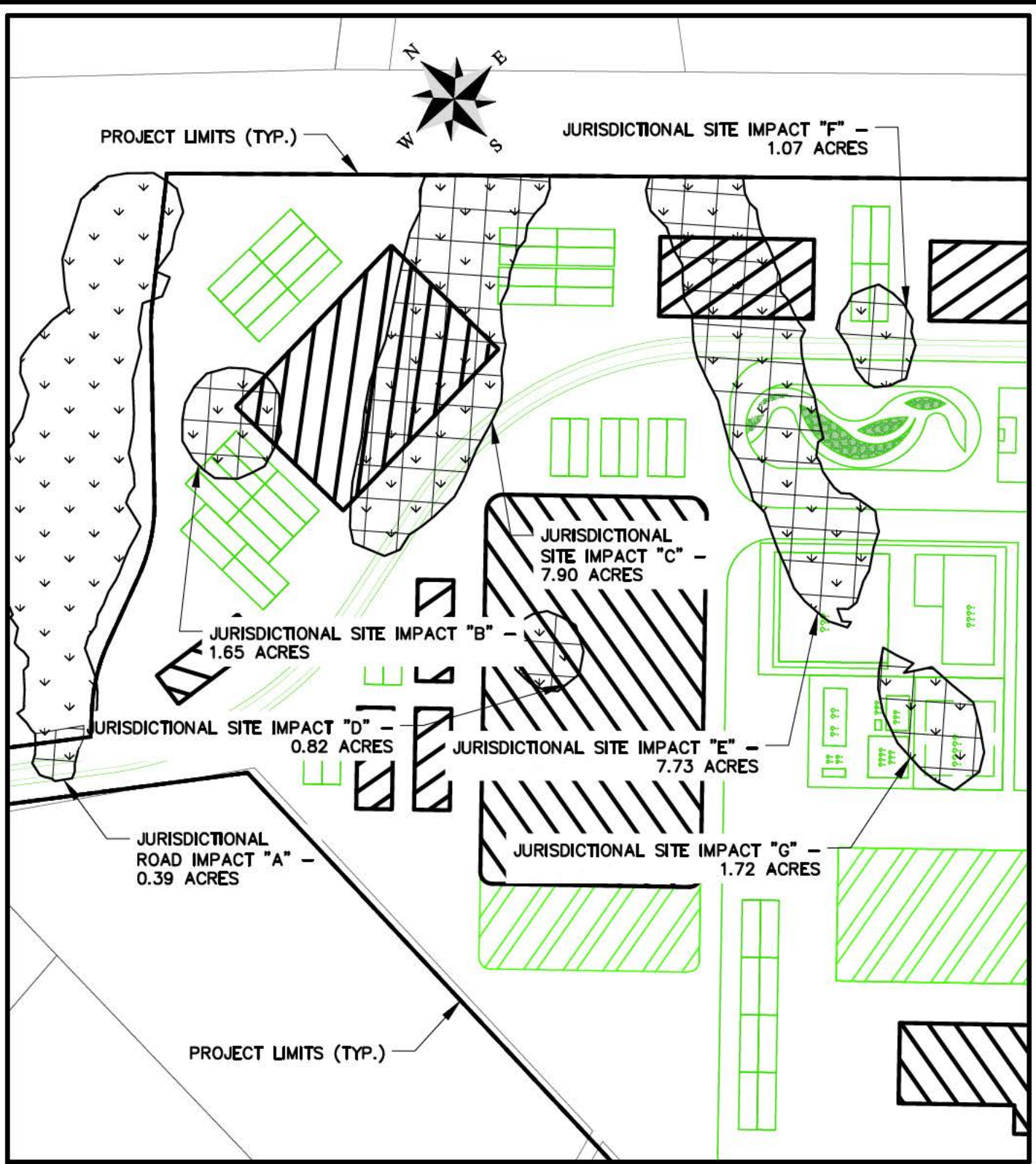
SHEET: 3 OF 18
SCALE: 1" = 3000'

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Z:\25503\25503.0000\Engineering\Drawings\Wetland Permit Drawings\Wetland Impacts (BCEDS).dwg - Mar 31, 2015 - 9:24:01 AM



BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

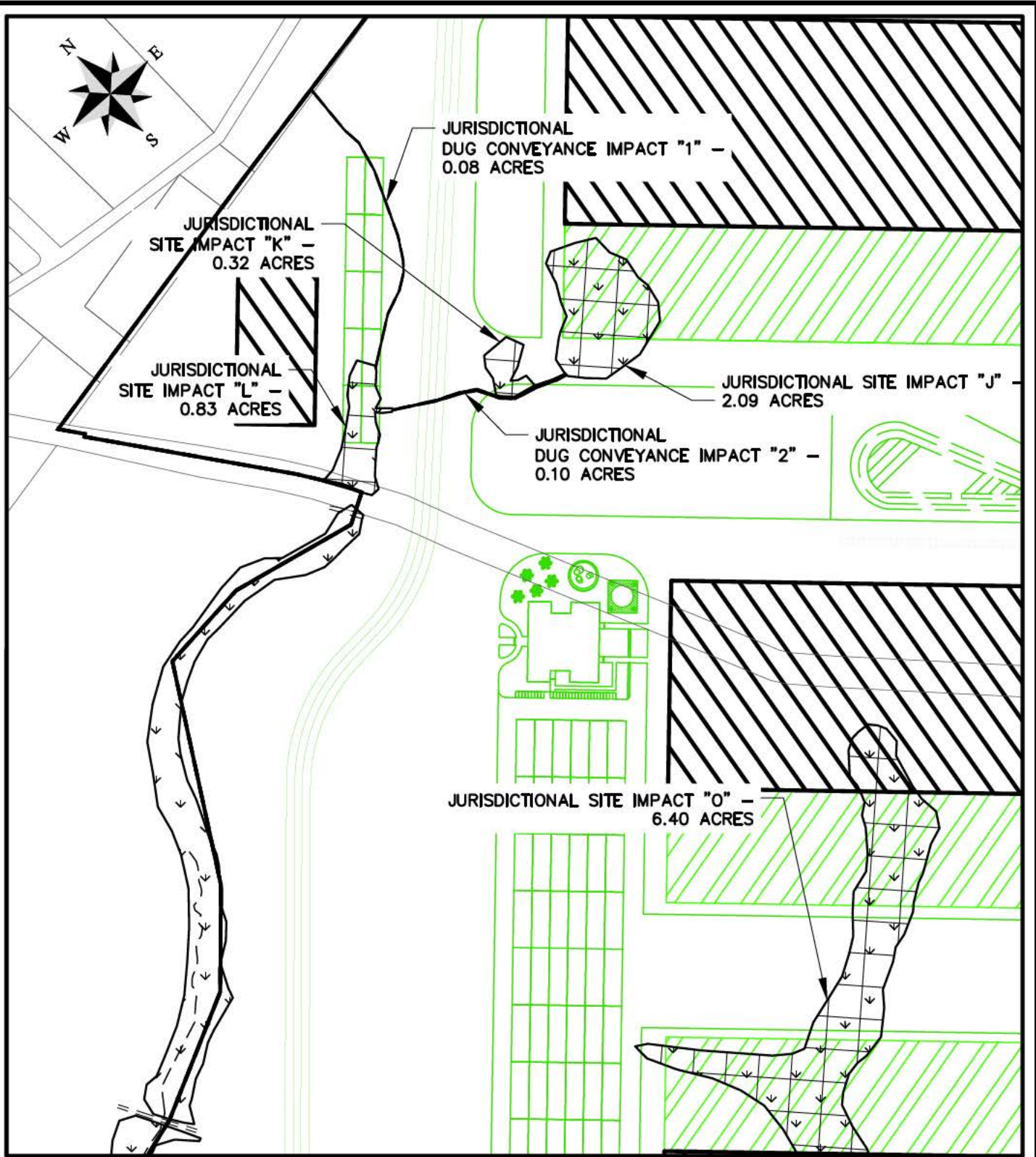
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 4 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

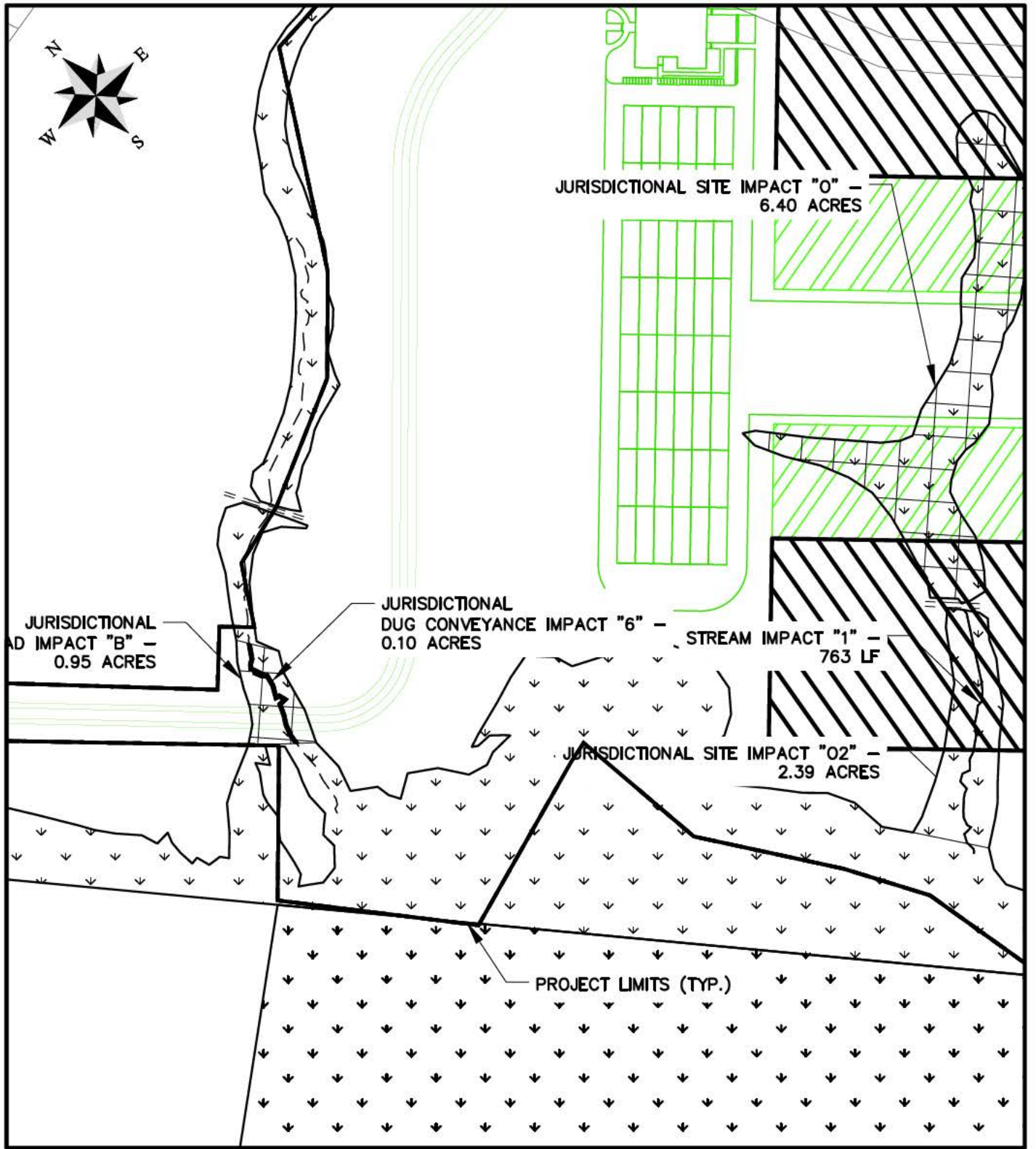
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 5 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY OEM SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

LOCATION: BRYAN COUNTY, GEORGIA
DATE: MARCH 31, 2015
JOB NUMBER: J - 25503

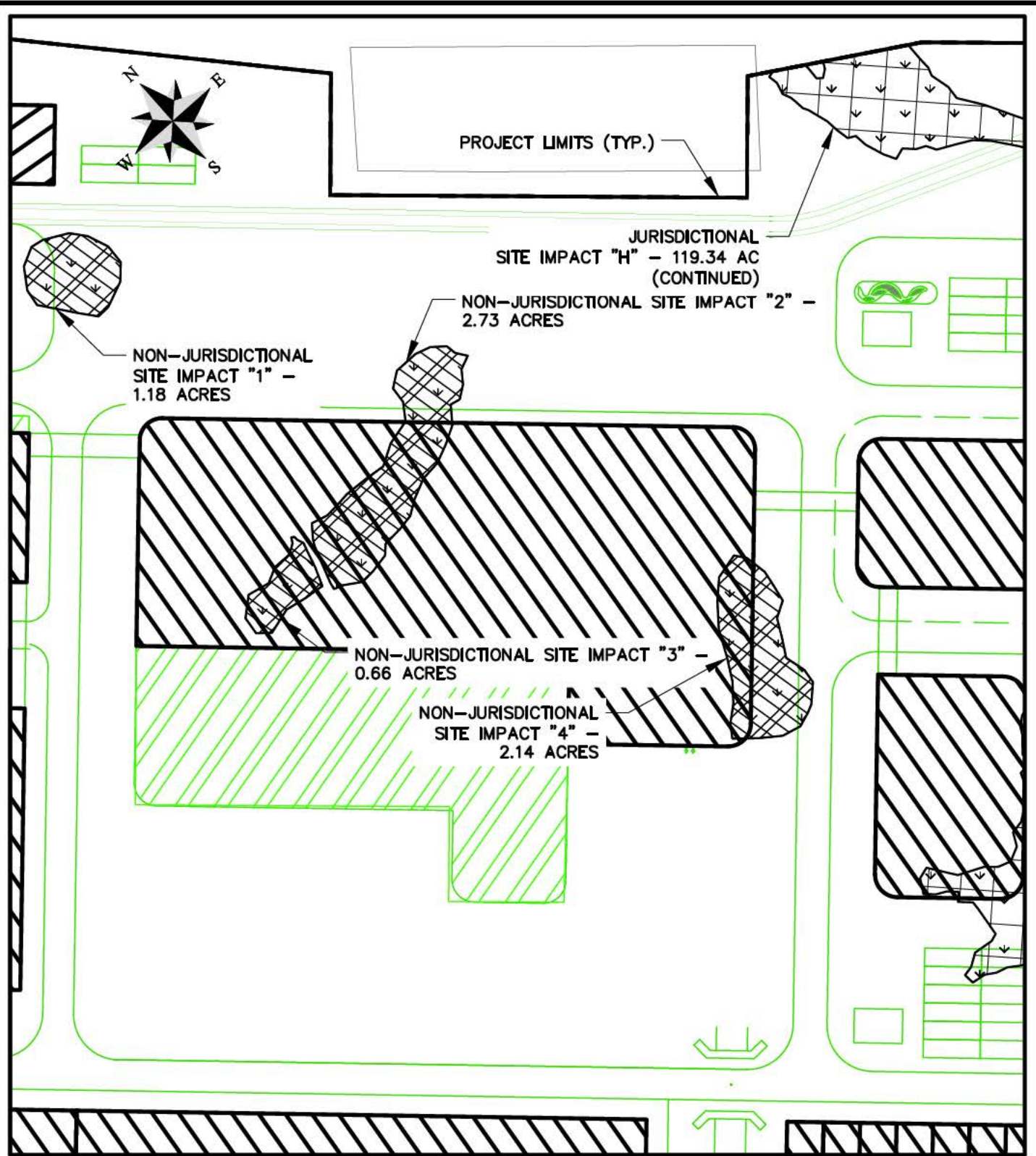
SHEET: 6 OF 14
SCALE: 1" = 400'



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Z:\25503\25503.0000\Engineering\Drawings\Wetland_Permit\Wetland_Permit Drawings\25503 - Wetland Impacts (BCEDS).dwg - Mar 31, 2015 - 9:24:01 AM



BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

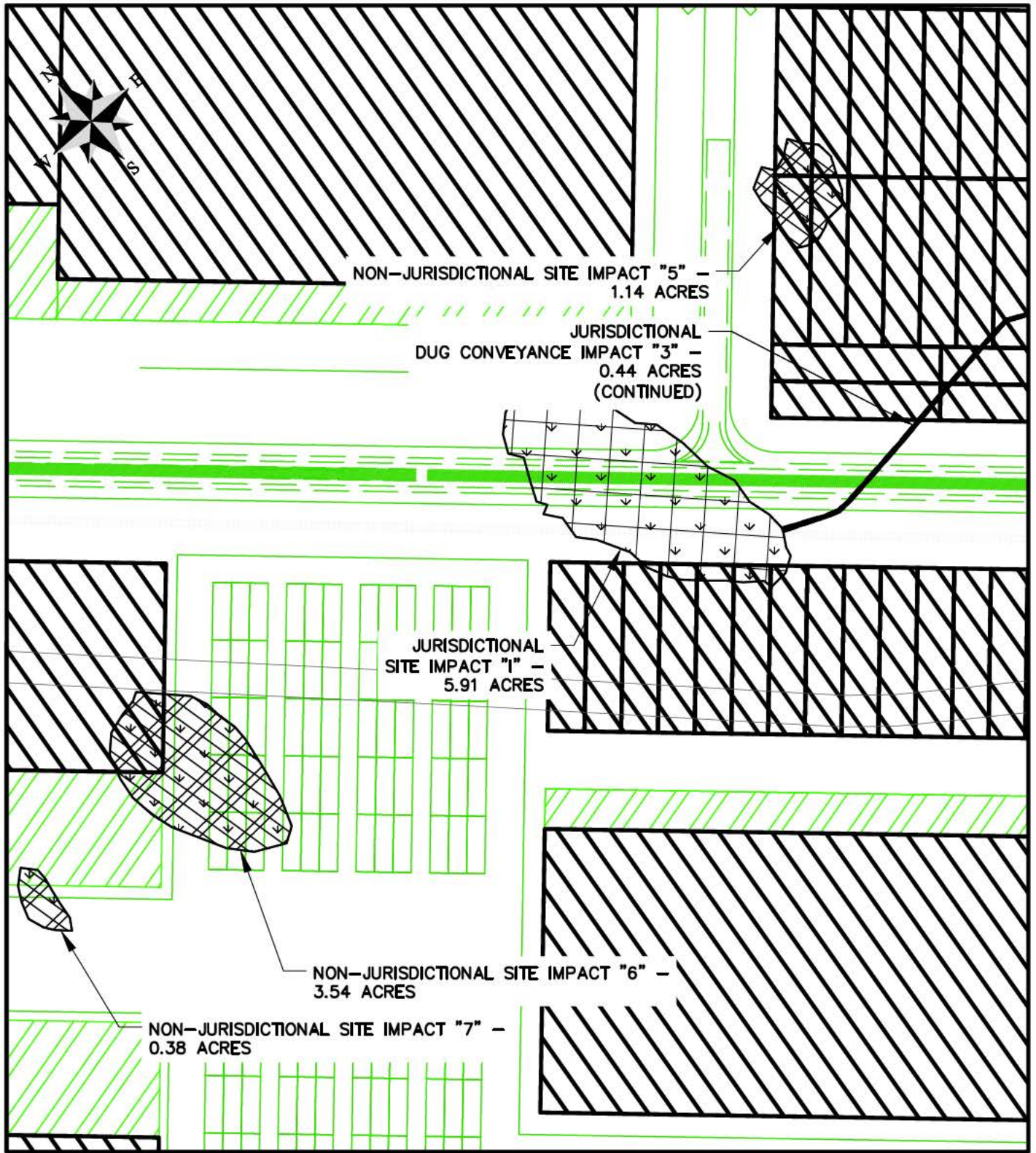
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 7 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

LOCATION: BRAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

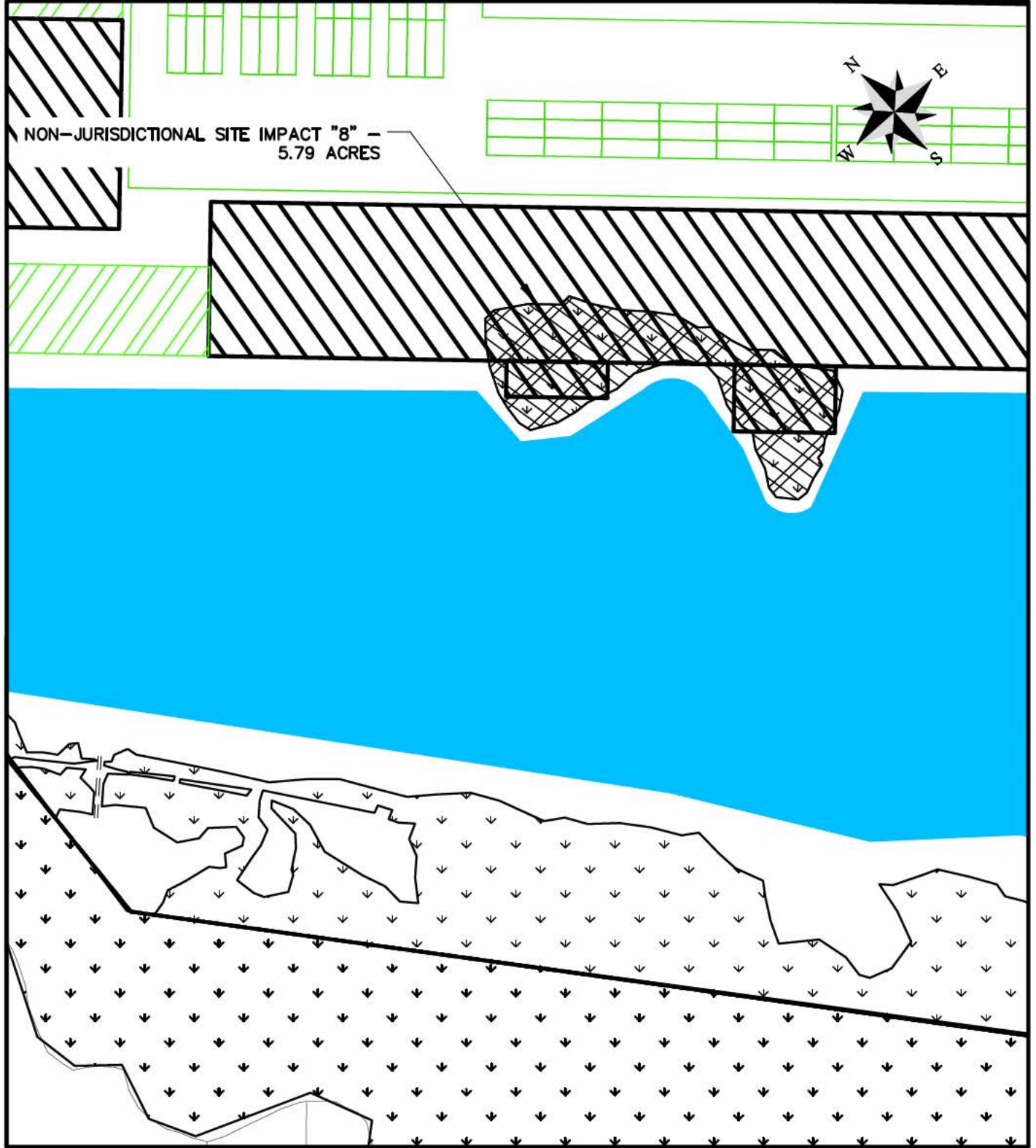
SHEET: 8 OF 18
SCALE: 1" = 400'

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Z:\25503\25503.0000\Engineering\Drawings\Wetland_Permit_Drawings\25503 - Wetland Impacts (BCEDS).dwg - Mar 31, 2015 - 9:24:01 AM



BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

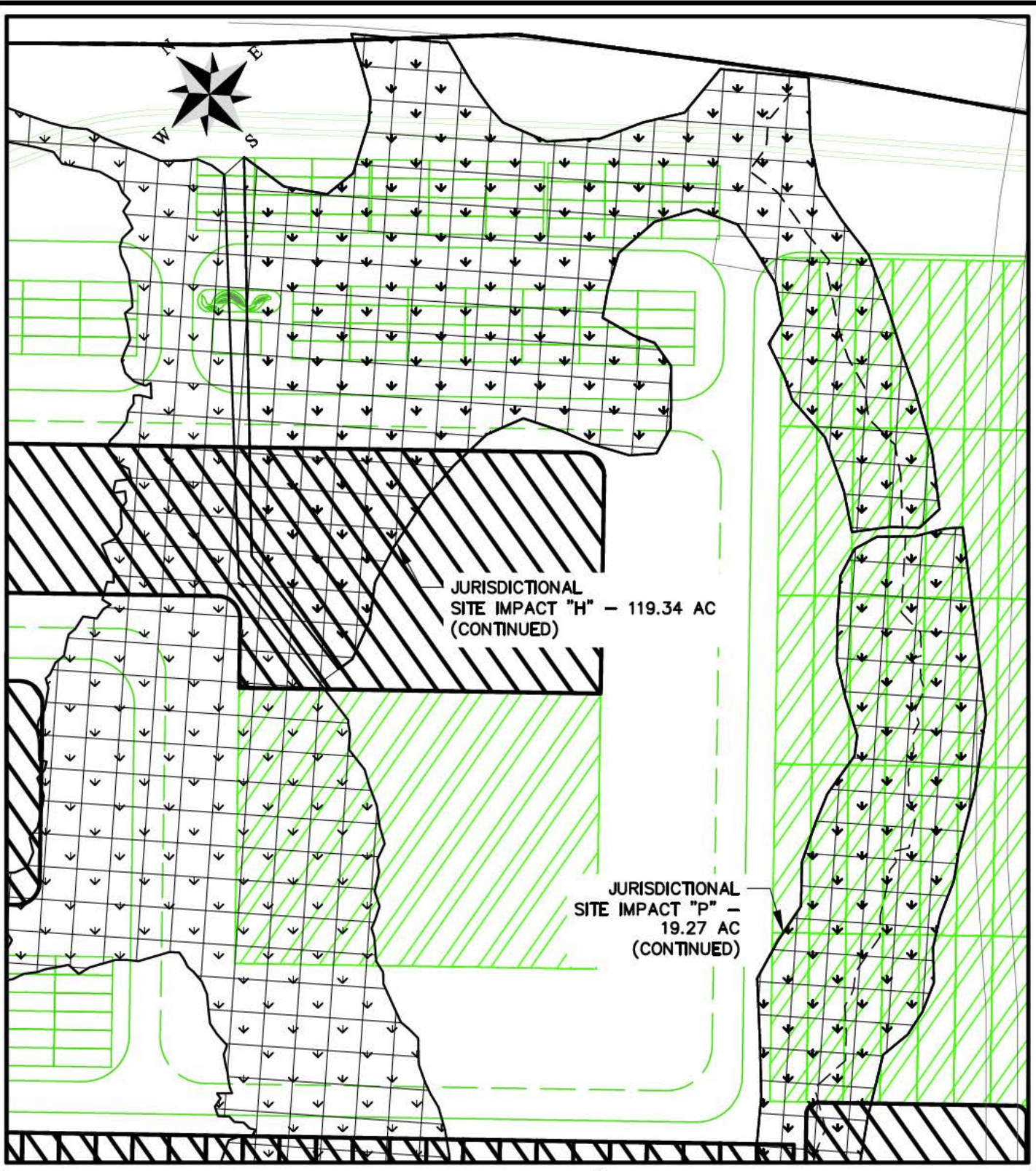
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 9 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

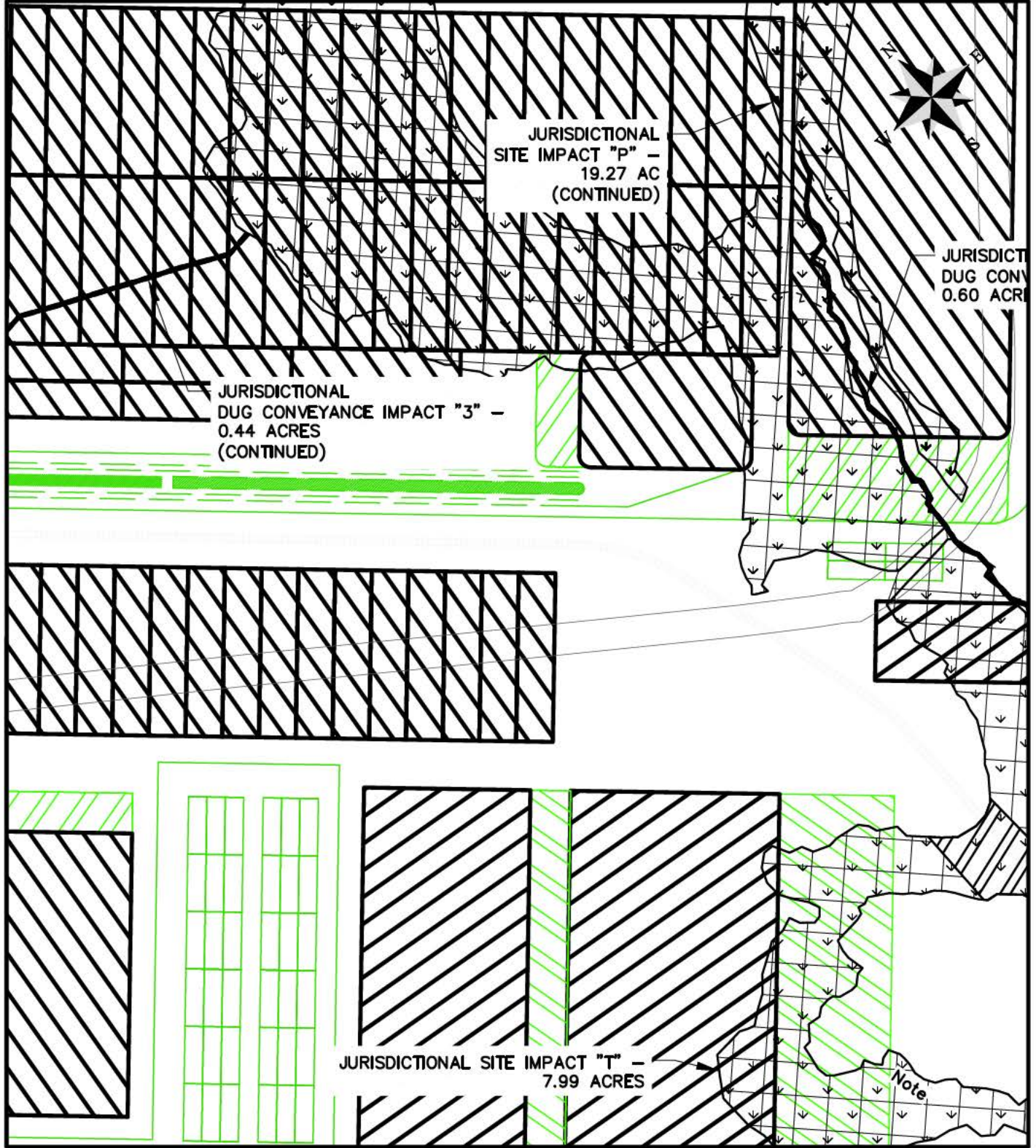
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 10 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

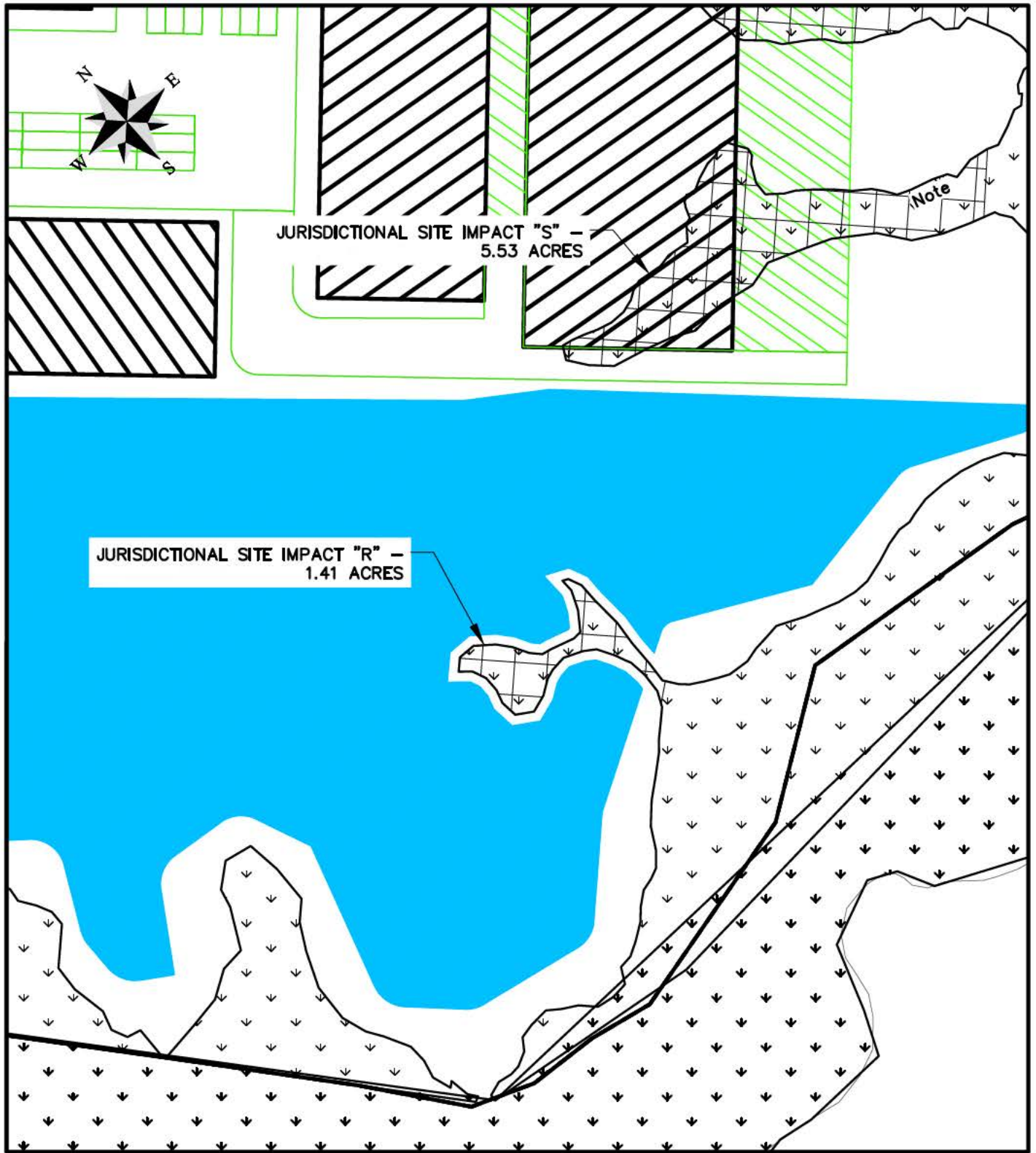
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 11 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

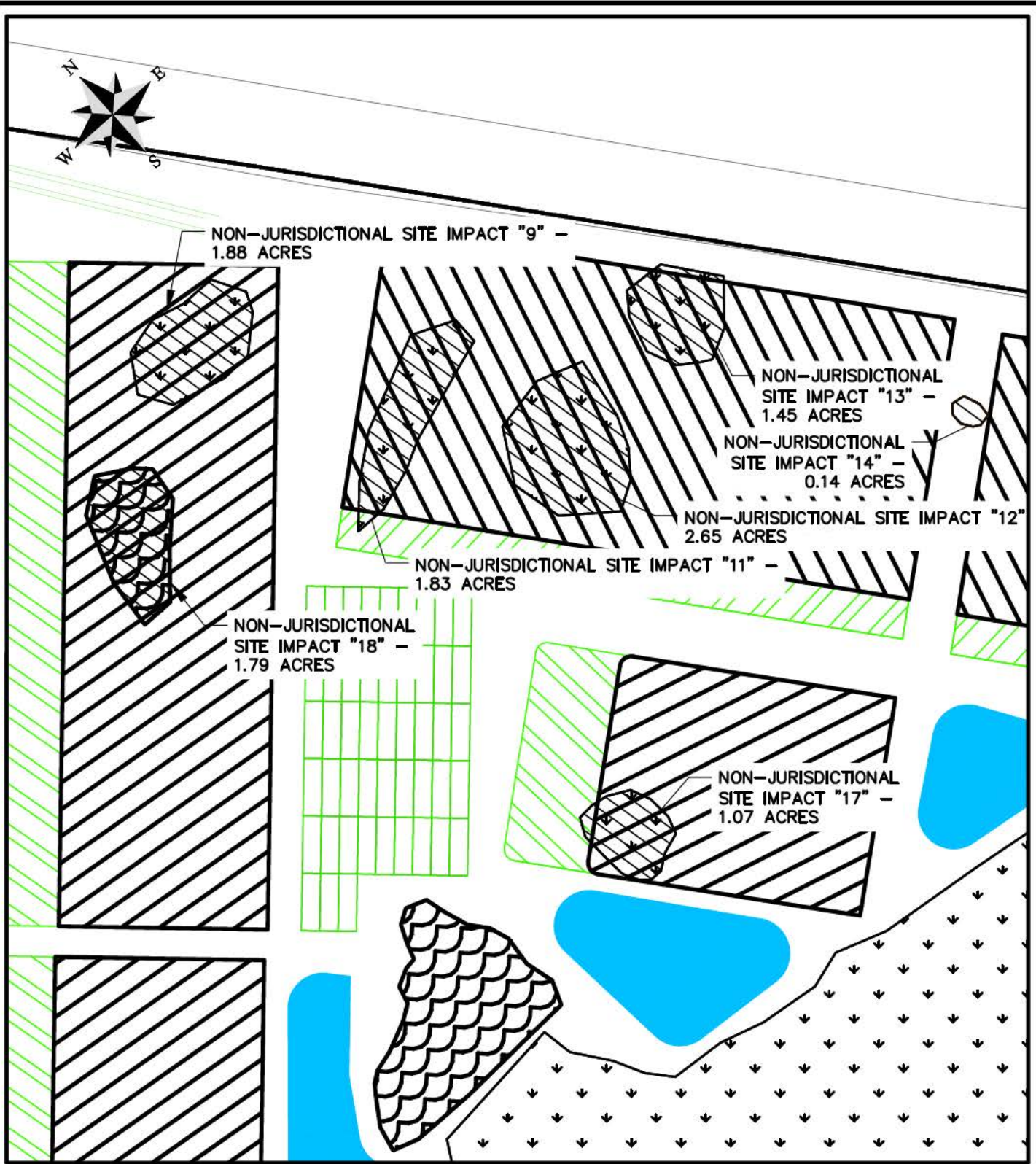
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 12 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

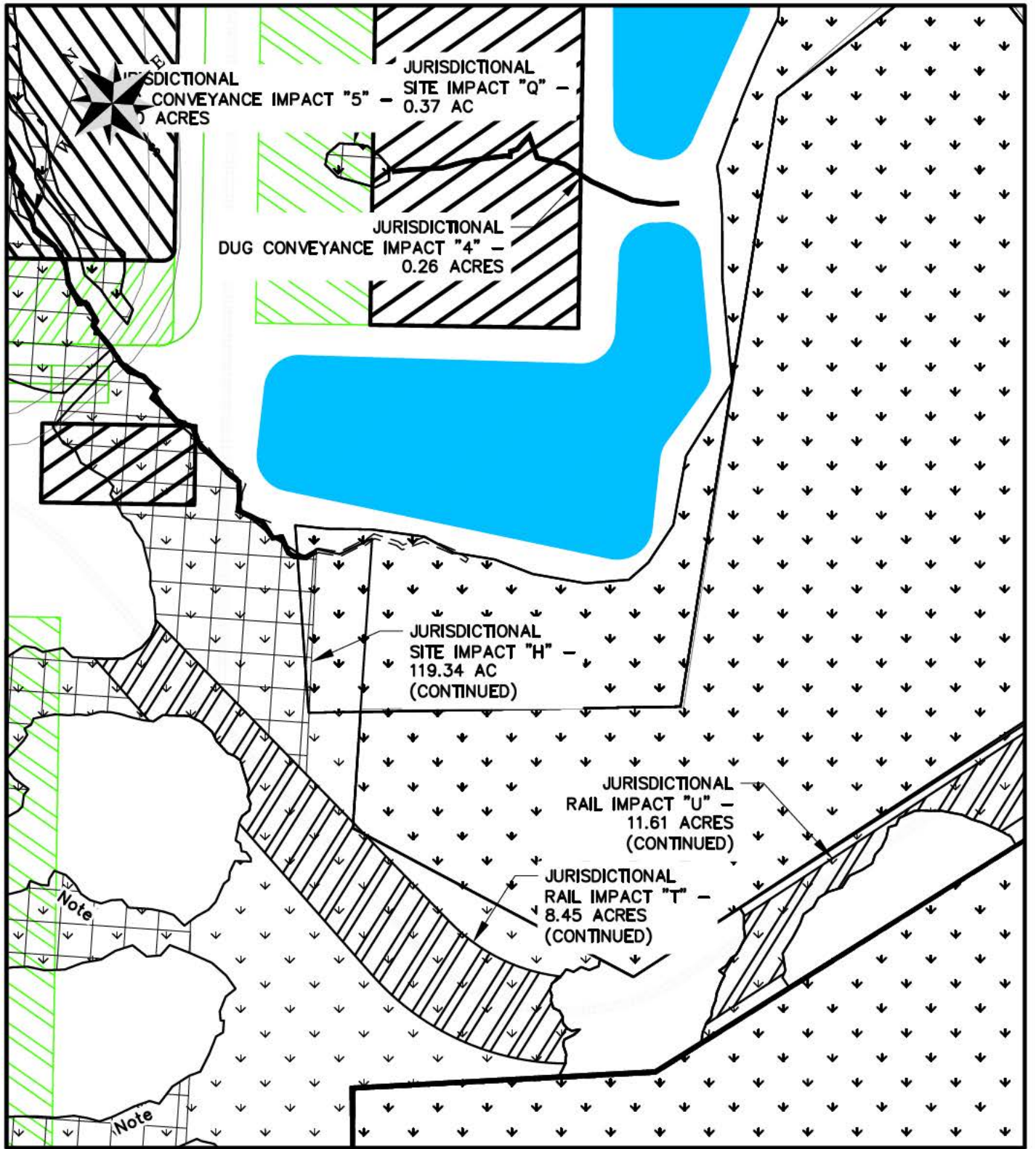
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 13 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
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CLIENT:
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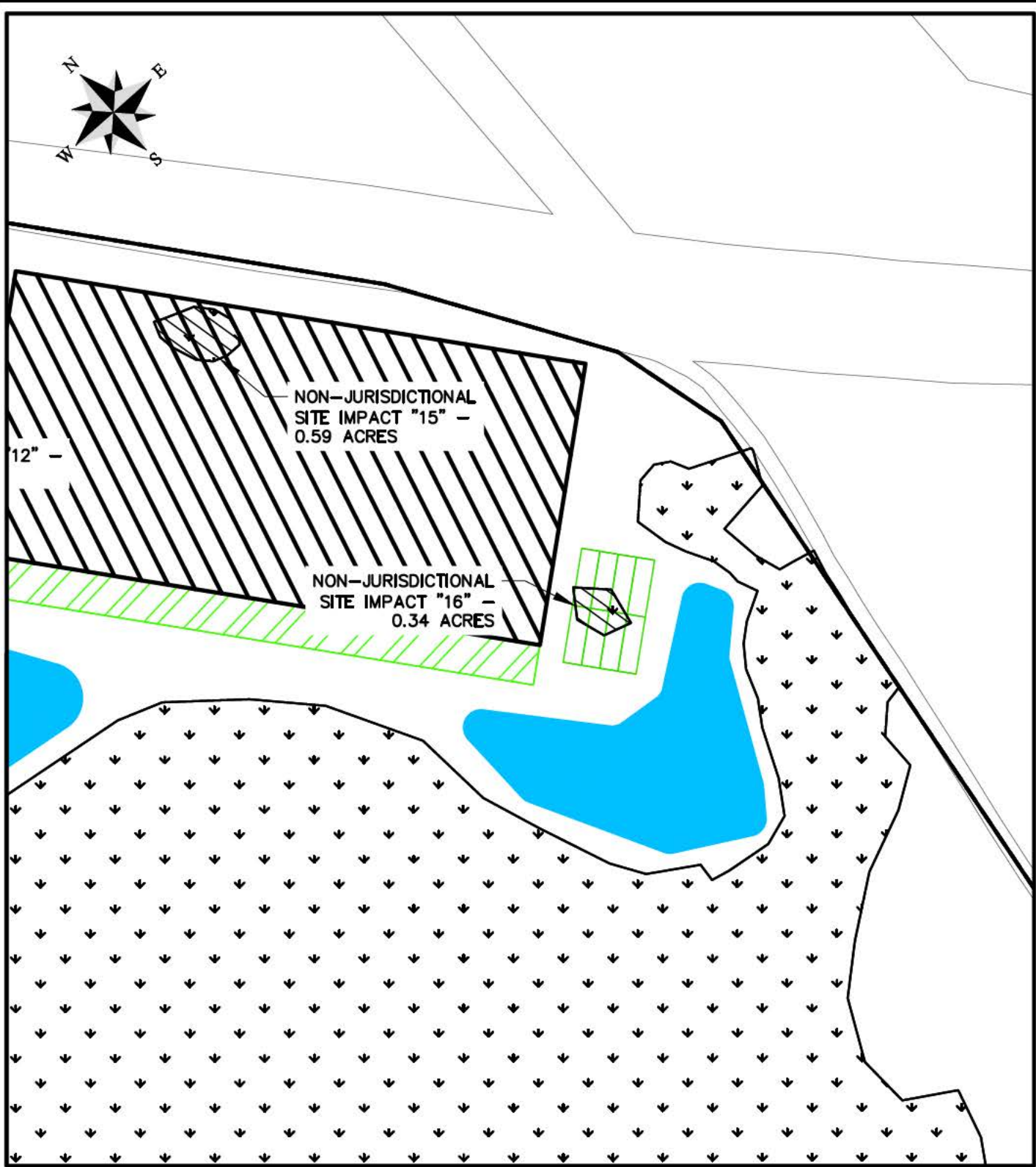
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 14 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
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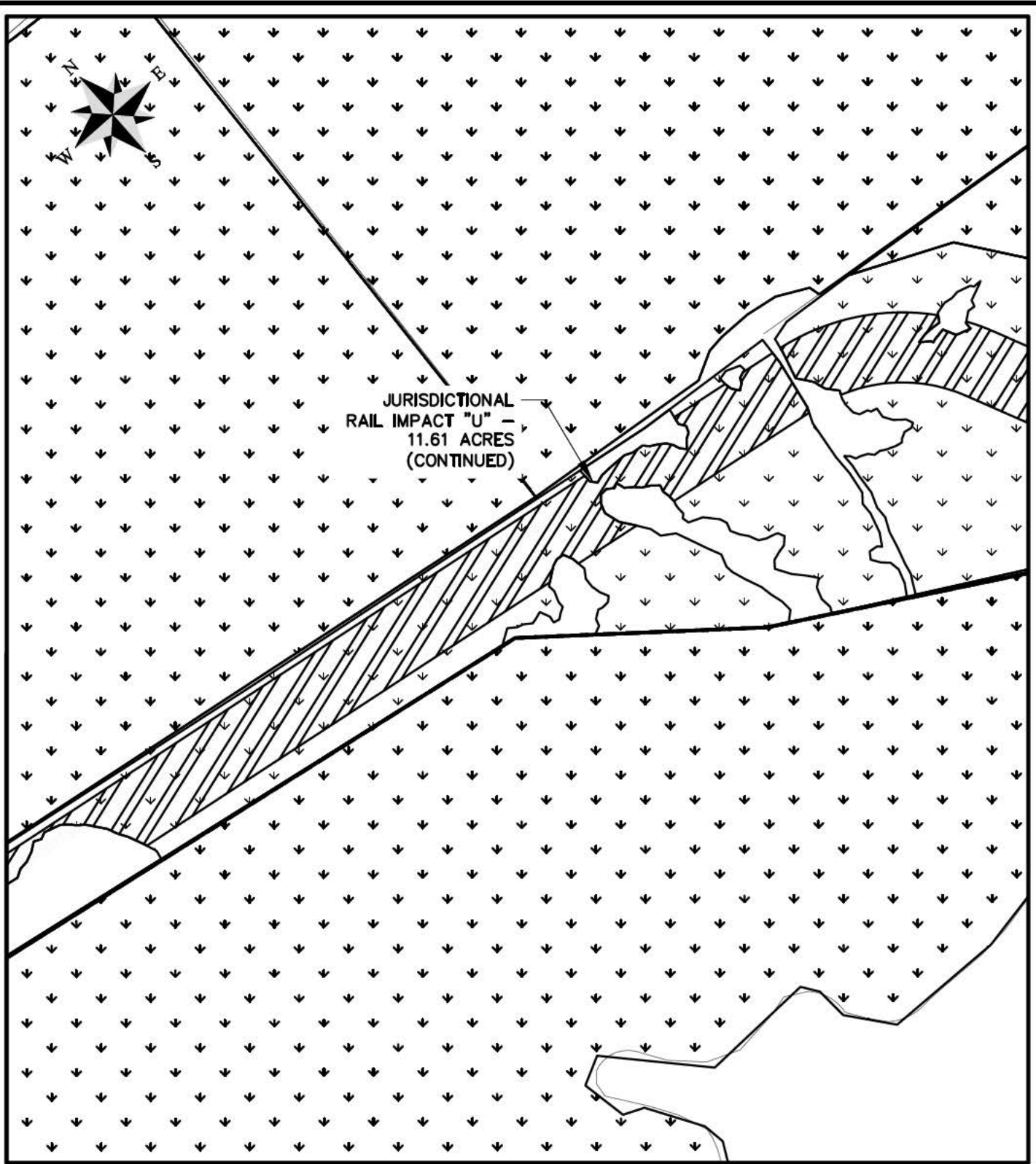
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 15 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
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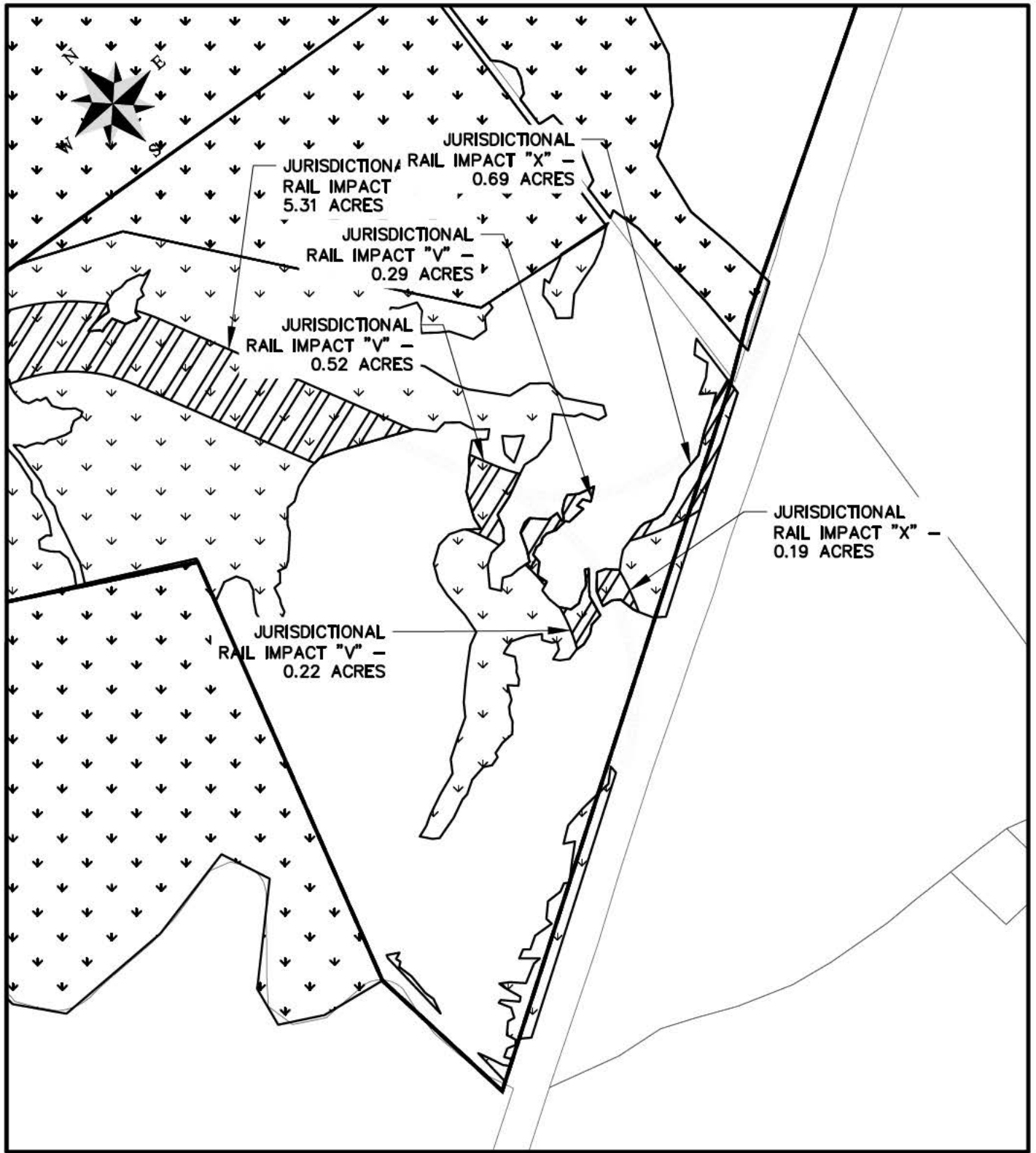
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 16 OF 18
SCALE: 1" = 400'

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BRYAN COUNTY MEGA SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
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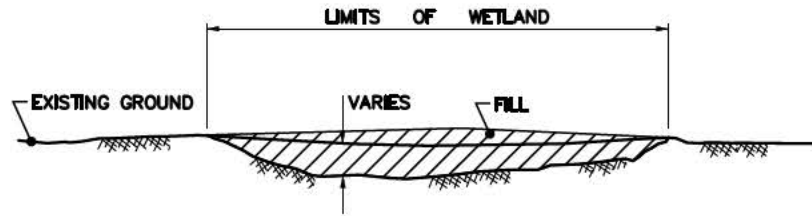
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MAY 11, 2022
JOB NUMBER: J - 25503

SHEET: 17 OF 18
SCALE: 1" = 400'

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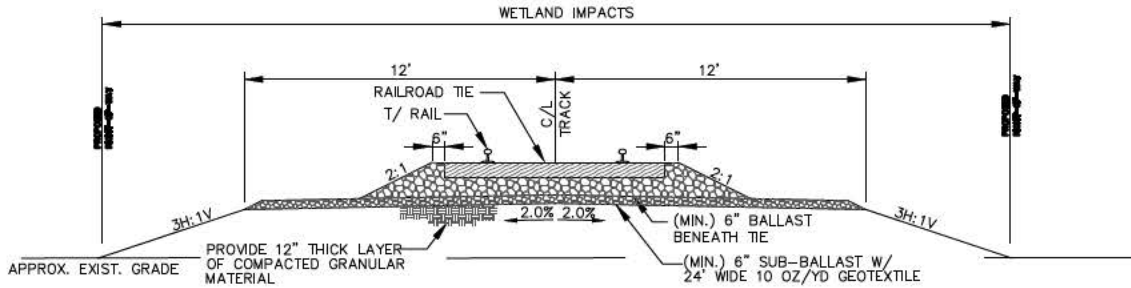
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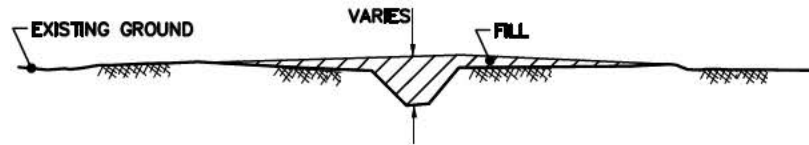
WETLAND FILL SECTION

NOT TO SCALE



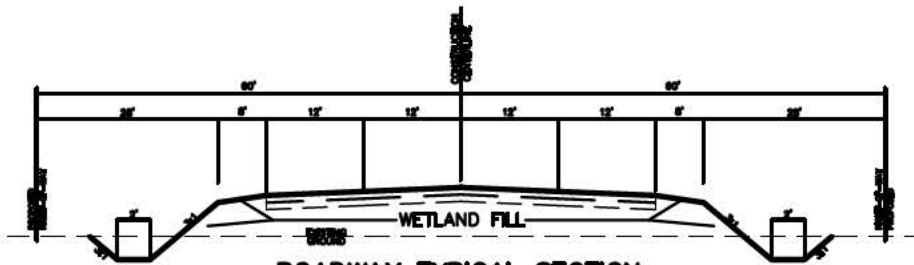
TYPICAL SECTION THRU RAIL SPUR

SCALE: NTS



STREAM/DUG CONVEYANCE FILL SECTION

NOT TO SCALE



ROADWAY TYPICAL SECTION

NOT TO SCALE

BRYAN COUNTY OEM SITE

PROPOSED ACTIVITY:
WETLAND PERMIT

CLIENT:
SAVANNAH HARBOR-INTERSTATE 16 CORRIDOR JOINT DEVELOPMENT AUTHORITY

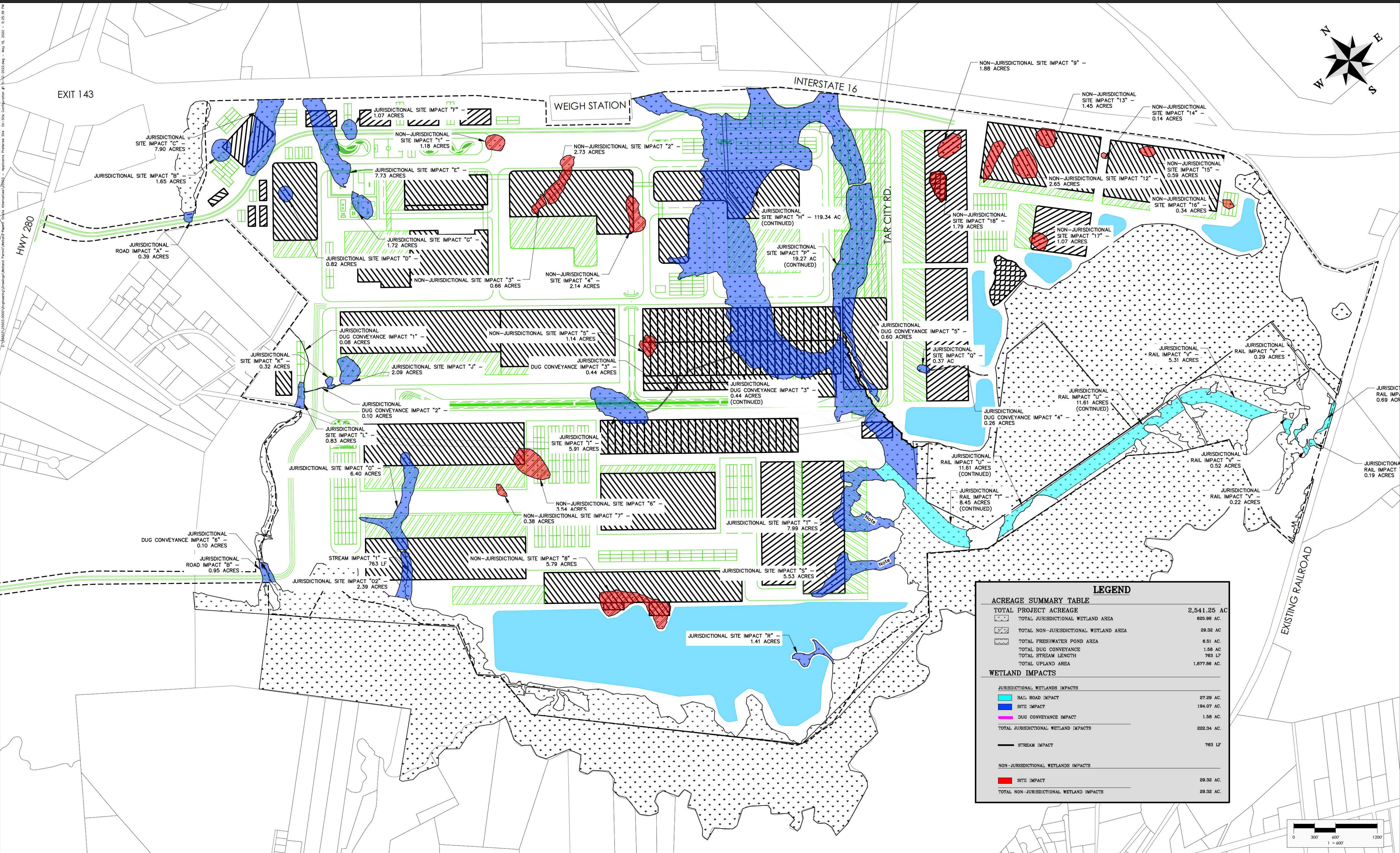
LOCATION: BRYAN COUNTY, GEORGIA
DATE: MARCH 31, 2015
JOB NUMBER: J - 25503

SHEET: 14 OF 14
SCALE: N.T.S.

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ACREAGE SUMMARY TABLE	
TOTAL PROJECT ACREAGE	2,541.25 AC
TOTAL JURISDICTIONAL WETLAND AREA	625.98 AC
TOTAL NON-JURISDICTIONAL WETLAND AREA	29.32 AC
TOTAL FRESHWATER POND AREA	6.51 AC
TOTAL DUG CONVEYANCE	1.56 AC
TOTAL STREAM LENGTH	783 LF
TOTAL UPLAND AREA	1,677.86 AC
WETLAND IMPACTS	
JURISDICTIONAL WETLANDS IMPACTS	
RAIL ROAD IMPACT	27.29 AC
SITE IMPACT	194.07 AC
DUG CONVEYANCE IMPACT	1.56 AC
TOTAL JURISDICTIONAL WETLAND IMPACTS	222.92 AC
STREAM IMPACT	783 LF
NON-JURISDICTIONAL WETLANDS IMPACTS	
SITE IMPACT	29.32 AC
TOTAL NON-JURISDICTIONAL WETLAND IMPACTS	29.32 AC

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APPLICANTS PREFERRED SITE / ON-SITE CONFIGURATION #1
 BRYAN COUNTY, GEORGIA

**Savannah Harbor-Interstate 16 Corridor
 Joint Development Authority**
 BRYAN • BULLOCH • CHATHAM • EFFINGHAM

MAY 16, 2022

This illustrates a general plan of the development which is for discussion purposes only. Does not limit or bind the owner and is subject to change and position locations are for illustrative purposes only and are subject to an accurate survey and property description. The producer assumes no legal responsibility for the appreciation or depreciation of any premises, commercial or otherwise, by reason of their inclusion or exclusion from this map. The information contained in this map is subject to change with out notice and is for illustrative purposes only. Unit counts shown above are approximate and may change. Values were provided by outside sources and have not been