

## Alton Brown Jr.

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**From:** Alton Brown Jr.  
**Sent:** Thursday, September 22, 2022 4:48 PM  
**To:** Sarah.E.Wise@usace.army.mil  
**Subject:** Bryan OEM  
**Attachments:** Alternative Site 5 NRCS Conservation Easement.pdf; Alternate Site #4 Exhibit Clayton County.pdf; September 2022 Alternatives Analysis Update.doc; Alternative 3 Rail Access Exhibit.pdf

Sarah: See attached. Let me know what you think.

1. Added language regarding 2,100 acre size requirement.
2. Added language regarding rail access for Alternative 3 (Bartow). Also created the attached exhibit to show the public roads and large number of parcels that would need to be crossed.
3. Revised language for Alternative Site 4 and included this site as part of the LEPA analysis. Also created the attached exhibit to show NWI wetland and stream impacts.
4. Revised language for Alternative Site 5 regarding easement and rail access. Also have attached a copy of the NRCS Wetlands Reserve Program Easement for Alternative Site 5. Extinguishing the easement for development would not be approved due to the conservation value of the easement and public interest in maintaining those conservation values. Would require an Act of Congress...
5. Revised language for preferred alternative to add NWI impacts (in addition to delineation impacts).
6. Regarding Traffic: GADOT has analyzed both existing and projected traffic volumes associated with proposed project. Based on this analysis, GDOT has developed a preliminary plan that includes over \$220MM in infrastructure improvements generally including improvements to the existing Highway 280/Interstate 16 Interchange, removal of the Jernigan Road/Interstate 16 overpass and construction of a new interchange on Interstate 16 east of the proposed project, improvements to Highway 280 south of Interstate 16 to accommodate for the north and south entrance to the facility and access point improvements from Highway 280 into the site. The proposed infrastructure improvements will accommodate for any traffic volume increase associated with the proposed project.

Following review, let me know if you need anything else. Thanks for all you have done on this project!

**Alton Brown, Jr. PRINCIPAL**

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Savannah GA, 31405

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U.S. Department of Agriculture  
Natural Resources Conservation Service

FILED  
BULLOCH COUNTY  
CLERK'S OFFICE

NRCS-LTP-30  
07/2014

Clear Form

**WARRANTY EASEMENT DEED  
IN PERPETUITY**

*Heather Banks McNeal*  
CLERK OF COURT

**AGRICULTURAL CONSERVATION EASEMENT PROGRAM –  
WETLAND RESERVE EASEMENT  
EASEMENT NO. 54-4310-17-01MFY**

**THIS WARRANTY EASEMENT DEED** is made by and between

GA 16 BULLOCH, LLC

SAVANNAH, GA

of

(hereafter referred to as the

“Landowner”), Grantor(s), and **the UNITED STATES OF AMERICA** and its assigns, (hereafter referred to as the “United States”), Grantee. The Landowner and the United States are jointly referred to as the “Parties”.

The United States of America is acquiring this property by and through the Commodity Credit Corporation (CCC) and the acquiring agency of the United States is the Natural Resources Conservation Service (NRCS), United States Department of Agriculture.

**Witnesseth:**

Purposes and Intent. The purpose of this easement is to restore, protect, manage, maintain, and enhance the functional values of wetlands and other lands, and for the conservation of natural values including fish and wildlife and their habitat, water quality improvement, flood water retention, groundwater recharge, open space, aesthetic values, and environmental education. It is the intent of NRCS to give the Landowner the opportunity to participate in the restoration and management activities on the Easement Area.

Authority. This easement deed acquisition is authorized by Subtitle H of Title XII of the Food Security Act of 1985, as amended, for the Agricultural Conservation Easement Program - Wetland Reserve Easement.

**NOW THEREFORE**, for and in consideration of the terms of this mutual obligations and benefits recited herein to each party and the sum of SEVEN MILLION FIVE HUNDRED FORTY FOUR THOUSAND EIGHT HUNDRED AND THIRY TWO Dollars (\$7,544,832), paid to Grantor(s), the receipt of which is hereby acknowledged, Grantor (s) hereby grants and conveys with general warranty of title to the UNITED STATES OF AMERICA and its assigns, (Grantee), in perpetuity, the lands comprising the Easement Area described in Part I and appurtenant rights of access to the Easement Area, but reserving to the Landowner only those rights, title, and interest in the lands comprising the

Easement Area expressly enumerated in Part II. It is the intention of the Landowner to convey and relinquish any and all other property rights not so reserved. This easement shall constitute a servitude upon the land so encumbered; shall run with the land for the duration of the easement; and shall bind the Grantor(s), their heirs, successors, assigns, lessees, and any other person claiming under them.

SUBJECT, however, to all valid rights of record, if any.

PART I. Description of the Easement Area. The lands encumbered by this easement deed, referred to hereafter as the Easement Area, are described on EXHIBIT A which is appended to and made a part of this easement deed.

TOGETHER with a right of access for ingress and egress to the Easement Area across adjacent or other properties of the Landowner. Such a right-of-way for access purposes is described in EXHIBIT B which is appended to and made a part of this easement deed.

PART II. Reservations in the Landowner on the Easement Area. Subject to the rights, title, and interest conveyed by this easement deed to the United States, including the restoration, protection, management, maintenance, enhancement, and monitoring of the wetland and other natural values of the Easement Area, the Landowner reserves:

- A. Title. Record title, along with the Landowner's right to convey, transfer, and otherwise alienate title to these reserved rights.
- B. Quiet Enjoyment. The right of the Landowner to enjoy the rights reserved on the Easement Area without interference from others.
- C. Control of Access. The right to prevent trespass and control access by the general public subject to the operation of State and Federal law.
- D. Recreational Uses. The right to undeveloped recreational uses, including undeveloped hunting and fishing and leasing of such rights for economic gain, pursuant to applicable State and Federal regulations that may be in effect at the time. Undeveloped recreational uses may include use of hunting or observation blinds that will accommodate no more than four people and are temporary, non-permanent and easily assembled, disassembled and moved without heavy equipment. Undeveloped recreational uses must be consistent with the long-term protection and enhancement of the wetland and other natural values of the Easement Area.
- E. Subsurface Resources. The right to oil, gas, minerals, and geothermal resources underlying the Easement Area, provided that any drilling or mining activities are to be located outside the boundaries of the Easement Area, unless activities within the boundaries are specified in accordance with the terms and conditions of EXHIBIT C which is appended to and made a part of this easement deed, if applicable.

- F. Water rights and water uses. The right to water uses and water rights identified as reserved to the Landowner in EXHIBIT D which is appended to and made a part of this Easement Deed, if applicable.

PART III. Obligations of the Landowner. The Landowner shall comply with all terms and conditions of this Easement, including the following:

- A. Prohibitions. Without otherwise limiting the rights of the United States acquired hereunder, it is expressly understood that the rights to carry out the following activities and uses have been acquired by the United States and, unless authorized by the United States under Part IV, are prohibited on the Easement Area:
1. haying, mowing, or seed harvesting for any reason;
  2. altering of grassland, woodland, wildlife habitat or other natural features by burning, digging, plowing, disking, cutting or otherwise destroying the vegetative cover;
  3. accumulating or dumping refuse, wastes, sewage, or other debris;
  4. harvesting wood or sod products;
  5. draining, dredging, channeling, filling, leveling, pumping, diking, impounding, or related activities, as well as altering or tampering with water control structures or devices, except as specifically set forth in EXHIBIT D, if applicable;
  6. diverting or causing or permitting the diversion of surface or underground water into, within, or out of the Easement Area by any means, except as specifically set forth in EXHIBIT D, if applicable;
  7. building, placing, or allowing to be placed structures on, under, or over the Easement Area; except for individual semi-permanent hunting or observation blinds for undeveloped recreational uses the external dimensions of which will be no more than 80 square feet and 8 feet in height, with the number, locations, and features of blinds approved by NRCS under Part IV;
  8. planting or harvesting any crop;
  9. grazing or allowing livestock on the Easement Area;
  10. disturbing or interfering with the nesting or brood-rearing activities of wildlife including migratory birds;
  11. use of the Easement Area for developed recreation. These uses include but are not limited to, camping facilities, recreational vehicle trails and tracks, sporting clay operations, skeet shooting operations, firearm range operations and the infrastructure to raise, stock, and release captive raised waterfowl, game birds and other wildlife for hunting or fishing;
  12. any activities which adversely impact or degrade wildlife cover or other habitat benefits, water quality benefits, or other wetland functions and values of the Easement Area; and
  13. any activities to be carried out on the Landowner's land that is immediately adjacent to, and functionally related to, the Easement Area if such activities

will alter, degrade, or otherwise diminish the functional value of the Easement Area.

- B. Noxious Plants and Pests. The Landowner is responsible for noxious weed control and emergency control of pests as required by all Federal, State, and local laws. A plan to control noxious weeds and pests must be approved in writing by the NRCS prior to implementation by the Landowner.
- C. Fences. Except for establishment cost incurred by the United States and replacement cost not due to the Landowner's negligence or malfeasance, all other costs involved in maintenance of fences and similar facilities to exclude livestock shall be the responsibility of the Landowner. The installation or use of fences which have the effect of preventing wildlife access and use of the Easement Area are prohibited on the Easement Area, easement boundary, or on the Landowner's land that is immediately adjacent to, and functionally related to, the Easement Area.
- D. Restoration. The Landowner shall allow the restoration and management activities NRCS deems necessary for the Easement Area.
- E. Access Maintenance. The Landowner is responsible to maintain any non-public portions of the access route described in Exhibit B such that the access route can be traversed by a standard four-wheel all-terrain vehicle at least annually.
- F. Use of water for easement purposes. The Landowner shall use water for easement purposes as set for in EXHIBIT D, which is appended to and made a part of this Easement Deed, if applicable.
- G. Protection of water rights and water uses. As set forth in EXHIBIT D, if applicable, the Landowner shall undertake actions necessary to protect any water rights and water uses for easement purposes.
- H. Taxes. The Landowner shall pay any and all real property and other taxes and assessments, if any, which may be levied against the land.
- I. Reporting. The Landowner shall report to the NRCS any conditions or events which may adversely affect the wetland, wildlife, and other natural values of the Easement Area.
- J. Survival. Irrelevant of any violations by the Landowner of the terms of this Easement Deed, this easement survives and runs with the land for its duration.
- K. Subsequent Conveyances. The Landowner agrees to notify NRCS in writing of the names and addresses of any party to whom the property subject to this Easement Deed is to be transferred at or prior to the time the transfer is consummated. Landowner and its successors and assigns shall specifically refer to this Easement

Deed in any subsequent lease, deed, or other instrument by which any interest in the property is conveyed.

PART IV. Compatible Uses by the Landowner.

- A. General. The United States may authorize, in writing and subject to such terms and conditions the NRCS may prescribe at its sole discretion, the temporary use of the Easement Area for compatible economic uses, including, but not limited to, managed timber harvest, periodic haying, or grazing.
- B. Limitations. Compatible use authorizations will only be made if, upon a determination by NRCS in the exercise of its sole discretion and rights, that the proposed use is consistent with the long-term protection and enhancement of the wetland and other natural values of the Easement Area. The NRCS shall prescribe the amount, method, timing, intensity, and duration of the compatible use. Compatible use authorizations do not vest any rights in the Landowner and can be revoked by NRCS at any time.

PART V. Rights of the United States. The rights of the United States include:

- A. Management activities. The United States has the right to enter the Easement Area to undertake, on a cost-share basis with the Landowner or other entity as determined by the United States, any activities to restore, protect, manage, maintain, enhance, and monitor the wetland and other natural values of the Easement Area. The United States may apply to or impound additional waters, in accordance with State water law, on the Easement Area in order to maintain or improve wetland and other natural values.
- B. Access. The United States has a right of reasonable ingress and egress to the Easement Area over the Landowner's property, whether or not the property is adjacent or appurtenant to the Easement Area, for the exercise of any of the rights of the United States under this Easement Deed. The authorized representatives of the United States may utilize vehicles and other reasonable modes of transportation for access purposes. To the extent practical, the United States shall utilize the access identified in EXHIBIT B. The United States may, in its discretion, conduct maintenance activities on the access route identified in Exhibit B to obtain physical access to the Easement Area for the exercise of any of the rights of the United States under this Easement Deed.
- C. Easement Management. The Secretary of Agriculture, by and through the NRCS, may delegate all or part of the management, monitoring or enforcement responsibilities under this Easement Deed to any Federal or State agencies authorized by law that the NRCS determines to have the appropriate authority, expertise and resources necessary to carry out such delegated responsibilities. State or federal agencies may utilize their general statutory authorities in the administration of any

delegated management, monitoring or enforcement responsibilities for this easement. The authority to modify, subordinate, exchange, or terminate this easement under Subtitle H of Title XII of the Food Security Act of 1985 is reserved to the Secretary of Agriculture in accordance with applicable law. If the United States at some future time acquires the underlying fee title in the property, the interest conveyed by this Easement Deed will not merge with fee title but will continue to exist and be managed as a separate estate.

- D. Violations and Remedies - Enforcement. The Parties, Successors, and Assigns, agree that the rights, title, interests, and prohibitions created by this Easement Deed constitute things of value to the United States and this Easement Deed may be introduced as evidence of same in any enforcement proceeding, administrative, civil or criminal, as the stipulation of the Parties hereto. If there is any failure of the Landowner to comply with any of the provisions of this Easement Deed, the United States or other delegated authority shall have any legal or equitable remedy provided by law and the right:
1. To enter upon the Easement Area to perform necessary work for prevention of or remediation of damage to wetland or other natural values; and,
  2. To assess all expenses incurred by the United States (including any legal fees or attorney fees) against the Landowner, to be owed immediately to the United States.

#### PART VI. General Provisions.

- A. Successors in Interest. The rights granted to the United States shall accrue to any of its agents or assigns. All obligations of the Landowner under this Easement Deed shall also bind the Landowner's heirs, successors, agents, assigns, lessees, and any other person claiming under them. All the Landowners who are parties to this Easement Deed shall be jointly and severally liable for compliance with its terms.
- B. Rules of Construction and Special Provisions. All rights in the Easement Area not reserved by the Landowner shall be deemed acquired by the United States. Any ambiguities in this Easement Deed shall be construed in favor of the United States to effect the wetland and conservation purposes for which this Easement Deed is being acquired. The property rights of the United States acquired under this easement shall be unaffected by any subsequent amendments or repeal of the Agricultural Conservation Easement Program. If the Landowner receives the consideration for this easement in installments, the Parties agree that the conveyance of this easement shall be totally effective upon the payment of the first installment.
- C. Environmental Warranty. "Environmental Law" or "Environmental Laws" means any and all Federal, State, local or municipal laws, orders, regulations, statutes,

ordinances, codes, guidelines, policies, or requirements of any governmental authority regulating or imposing standards of liability or standards of conduct (including common law) concerning air, water, solid waste, hazardous materials or substance, worker and community right-to-know, hazard communication, noise, radioactive material, resource protection, subdivision, inland wetlands and watercourses, health protection and similar environmental health, safety, building and land use as may now or at any time hereafter be in effect.

“Hazardous Materials” means any petroleum, petroleum products, fuel oil, waste oils, explosives, reactive materials, ignitable materials, corrosive materials, hazardous chemicals, hazardous wastes, hazardous substances, extremely hazardous substances, toxic substances, toxic chemicals, radioactive materials, infectious materials, and any other element, compound, mixture, solution or substance which may pose a present or potential hazard to human health or the environment.

Landowner warrants that it is in compliance with, and shall remain in compliance with, all applicable Environmental Laws. Landowner warrants that there are no notices by any government authority of any violation or alleged violation of, non-compliance or alleged non-compliance with or any liability under any Environmental Law relating to the operations or conditions of the Easement Area. Landowner further warrants that it has no actual knowledge of a release or threatened release of Hazardous Materials on, beneath, near or from the Easement Area..

- D. General Indemnification. Landowner shall indemnify and hold harmless the United States, its employees, agents, and assigns for any and all liabilities, claims, demands, losses, expenses, damages, fines, fees, penalties, suits, proceedings, actions, and cost of actions, sanctions asserted by or on behalf of any person or government authority, and other liabilities (whether legal or equitable in nature and including, without limitation, court costs, and reasonable attorneys’ fees and attorneys’ fees on appeal) to which the United States may be subject or incur relating to the Easement Area, which may arise from, but is not limited to, Landowner’s negligent acts or omissions or Grantor’s breach of any representation, warranty, covenant, or agreements contained in this Easement Deed, or violations of any Federal, State, local or municipal laws, including all Environmental Laws.



**TO HAVE AND TO HOLD**, this Warranty Easement Deed is granted to the United States of America and its assigns forever. The Landowner covenants that he, she, or they are vested with good title to the Easement Area and will warrant and defend the same on behalf of the United States against all claims and demands. The Landowner covenants to comply with the terms and conditions enumerated in this document for the use of the Easement Area and adjacent lands for access, and to refrain from any activity not specifically allowed or that is inconsistent with the purposes of this Easement Deed.

Dated this 30 day of November, 2017.

Landowner(s): IDA YANCEY BRADLEY, MEMBER, WYNGATE HOLDINGS, LLC

*Ada Yancey Bradley*

DANIEL H. BRADLEY JR, MANAGER, GA 16 BULLOCH, LLC

*Daniel H. Bradley Jr.*

DANIEL H. BRADLEY JR., MANAGER, BRADLEY INVESTMENTS, LLC

*Daniel H. Bradley Jr.*

DANIEL H. BRADLEY JR., MANAGER, WYNGATE HOLDINGS, LLC

*Daniel H. Bradley Jr.*

**ACKNOWLEDGMENT**

STATE OF Georgia

COUNTY OF Fulton

On this 30 day of November, 2017, before me, the undersigned, a Notary Public in and for said State personally appeared Ada Yancey & Daniel H. Bradley, Jr. who proved to me to be the person(s) described in and who executed the foregoing instrument, and acknowledged that they executed the same as their free act and deed.

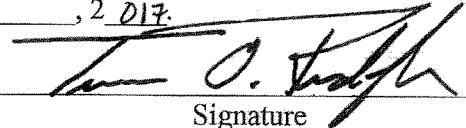
IN TESTIMONY WHEREOF, I have hereunto set my hand and official seal the day and year first above written.

Notary Public for the State of Georgia  
Residing at Cobb County, GA  
My Commission Expires Nov. 13, 2018

**ACCEPTANCE BY GRANTEE:**

I Terrance O. Rudolph (name), State Conservationist (title), being the duly authorized representative of the United States Department of Agriculture, Natural Resources Conservation Service, do hereby accept this Warranty Easement Deed with respect to the rights and duties of the United States of America, Grantee.

Dated this 4<sup>th</sup> day of December, 2017.

  
Signature  
State Conservationist  
Title

This instrument was drafted by the Office of General Counsel, U.S. Department of Agriculture, Washington, D.C. 20250-1400.

**NONDISCRIMINATION STATEMENT**

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its program and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or a part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (1202) 720-2600 (voice and TDD). To file a complaint of discrimination write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 705-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

**PRIVACY ACT STATEMENT**

The above statements are made in accordance with the Privacy Act of 1974 (U.S.C. 522a). Furnishing this information is voluntary; however, failure to furnish correct, complete information will result in the withholding or withdrawal of such technical or financial assistance. The information may be furnished to other USDA agencies, the Internal Revenue Service, the Department of Justice, or other State or Federal Law enforcement agencies, or in response to orders of a court, magistrate, or administrative tribunal.

EXHIBIT A - LEGAL DESCRIPTION

LEGAL DESCRIPTION TRACT No. 1

All that tract or parcel of land lying and being in the 1340<sup>th</sup>. G.M.D. of Bulloch County and 19<sup>th</sup> G.M.D. of Bryan County, Georgia, being more particularly described as follows;

Commencing at a PK Nail at the apparent centerline intersection of pavement of GA. Hwy. No. 67 and Owens Road, having State Plane Coordinates N=802,908.40' and E=804,217.48'; THENCE N52°32'42"W for a distance of 72.22 feet to a 5/8" rebar on the Western right-of-way (100') of GA. Hwy. No. 67, having State Plane Coordinates of N=802,952.32 and E=804,160.14, this being the Point of Beginning of this Parcel;

THENCE beginning a curve to the left, an arc distance of 871.04 feet and a radius of 3,850.00 feet being subtended by a chord of S14°52'34"E for a distance of 869.19 feet along said right-of-way to a point; THENCE S21°21'27"E for a distance of 1,254.96 feet along said right-of-way to a 5/8" rebar; THENCE S21°21'27"E for a distance of 30.85 feet along said right-of-way to a point; THENCE S21°24'08"E for a distance of 1,843.47 feet along said right-of-way to a 5/8" rebar; THENCE S21°22'36"E for a distance of 1,487.90 feet along said right-of-way to a point; THENCE along a curve to the left having an arc distance of 1,548.79 feet and a radius of 3,850.00 feet being subtended by a chord of S32°54'04"E for a distance of 1,538.36 feet along said right-of-way to a point; THENCE S44°25'32"E for a distance of 843.75 feet along said right-of-way to a 4x4 concrete monument; THENCE S64°11'32"W for a distance of 893.00 feet to a 4x4 concrete monument; THENCE N24°16'53"W for a distance of 647.23 feet to a 4x4 concrete monument; THENCE S65°43'01"W for a distance of 523.21 feet to a 4x4 concrete monument; THENCE S24°43'10"E for a distance of 662.80 feet to a 4x4 concrete monument; THENCE S24°43'10"E for a distance of 1,840.34 feet to a 1" pipe in the run of a branch; THENCE the following courses along the run of branch, S85°44'14"W for a distance of 128.49 feet to a point; THENCE N87°29'59"W for a distance of 175.60 feet to a point; THENCE S63°56'58"W for a distance of 188.89 feet to a point; THENCE S63°19'04"W for a distance of 315.03 feet to a point; THENCE S37°34'14"W for a distance of 396.95 feet to a point; THENCE S71°55'12"W for a distance of 269.29 feet to a point; THENCE S52°37'33"W for a distance of 328.36 feet to a point; THENCE S55°02'13"W for a distance of 319.56 feet to a point; THENCE S37°51'51"W for a distance of 218.43 feet to a point; THENCE S38°06'26"W for a distance of 329.91 feet to a point; THENCE S55°44'05"W for a distance of 353.78 feet to a point; THENCE S25°19'55"W for a distance of 310.93 feet to a point; THENCE S61°56'27"W for a distance of 254.37 feet to a point; THENCE S75°06'32"W for a distance of 236.49 feet to a point; THENCE S38°28'35"W for a distance of 306.03 feet to a point; THENCE S44°38'33"W for a distance of 424.29 feet to a point; THENCE S45°05'31"W for a distance of 441.24 feet to a point; THENCE S85°15'31"W for a distance of 315.26 feet to a 1" pipe; THENCE N71°49'57"W for a distance of 144.05 feet to a point; THENCE N64°36'02"W for a distance of 251.84 feet to a point; THENCE N42°23'35"W for a distance of 275.94 feet to a point; THENCE N46°40'54"W for a distance of 224.76 feet to a point; THENCE N48°20'49"W for a distance of 291.60 feet to a point; THENCE N69°46'17"W for a distance of 298.82 feet to a point; THENCE N68°59'47"W for a distance of 309.62 feet to a point; THENCE N68°52'17"W for a distance of 310.81 feet to a point; THENCE S89°15'52"W for a distance of 298.25 feet to a point; THENCE S55°13'04"W for a distance of 400.89 feet to a point; THENCE S49°41'12"W for a distance of 345.85 feet to a point; THENCE S52°08'53"W for a distance of 239.42 feet to a point; THENCE S65°26'21"W for a distance of 170.93 feet to a point; THENCE S42°50'53"W for a distance of 232.56 feet to a point; THENCE S45°56'33"W for a distance of 187.76 feet to a point; THENCE S47°45'45"W for a distance of 240.65 feet to a point; THENCE S20°57'37"W for a distance of 192.75 feet to a point; THENCE S63°42'35"W for a distance of 84.13 feet to a point; THENCE S24°15'08"W for a distance of 498.83 feet to a

point; THENCE S50°10'25"W for a distance of 486.14 feet to a point; THENCE S46°06'56"W for a distance of 594.29 feet to a point; THENCE S85°25'38"W for a distance of 265.84 feet to a point; THENCE S62°34'14"W for a distance of 367.84 feet to a point; THENCE S45°34'27"W for a distance of 618.07 feet to a point; THENCE N65°27'20"W for a distance of 227.19 feet to a point; THENCE N23°06'38"W for a distance of 251.19 feet to a point; THENCE N35°06'07"E for a distance of 225.90 feet to a point; THENCE N20°18'08"W for a distance of 192.86 feet to a point; THENCE N51°18'13"W for a distance of 267.31 feet to a point; THENCE N71°28'32"W for a distance of 276.94 feet to a point; THENCE S80°09'08"W for a distance of 500.34 feet to a point; THENCE S78°54'01"W for a distance of 586.64 feet to a point; THENCE S71°37'19"W for a distance of 283.22 feet to a 4x4 concrete monument; THENCE leaving said run of branch, S88°36'16"W for a distance of 1,721.47 feet to a 4x4 concrete monument; THENCE N55°49'51"W for a distance of 239.52 feet to a 4x4 concrete monument; THENCE S64°32'03"W for a distance of 239.97 feet to a 4x4 concrete monument; THENCE S21°44'16"W for a distance of 155.68 feet to a 4x4 concrete monument; THENCE N54°03'22"W for a distance of 352.61 feet to a 4x4 concrete monument; THENCE N37°03'59"W for a distance of 351.82 feet to a 4x4 concrete monument; THENCE N64°31'29"W for a distance of 136.00 feet to a 4x4 concrete monument; THENCE N75°05'14"W for a distance of 223.76 feet to a 4x4 concrete monument; THENCE S48°59'02"W for a distance of 384.56 feet to a 4x4 concrete monument; THENCE S68°05'16"W for a distance of 332.81 feet to a 4x4 concrete monument; THENCE N35°35'14"W for a distance of 860.22 feet to a 5/8" rebar on the Eastern right-of-way (40') of Mill Branch Club Rd.; THENCE N05°38'05"W for a distance of 221.54 feet along said 40' right-of-way to a point; THENCE N01°14'50"W for a distance of 239.83 feet along said 40' right-of-way to a point; THENCE along a curve to the left having an arc distance of 155.36 feet and a radius of 470.00 feet being subtended by a chord of N10°43'01"W for a distance of 154.66 feet along said 40' right-of-way to a point; THENCE N20°11'12"W for a distance of 408.52 feet along said 40' right-of-way to a point; THENCE N19°05'43"W for a distance of 473.14 feet along said 40' right-of-way to a point; THENCE N20°05'34"W for a distance of 1,468.85 feet along said 40' right-of-way to a 5/8" rebar; THENCE N20°05'34"W for a distance of 2.91 feet along said 40' right-of-way to a point; THENCE N20°15'33"W for a distance of 589.28 feet along said 40' right-of-way to a point; THENCE along a curve to the right having an arc distance of 338.94 feet and a radius of 530.00 feet being subtended by a chord of N01°56'20"W for a distance of 333.19 feet along said 40' right-of-way to a 5/8" rebar in the run of a branch; THENCE the following courses along the run of branch, N57°57'00"E for a distance of 75.48 feet to a point; THENCE N39°54'52"E for a distance of 137.59 feet to a point; THENCE N88°46'46"E for a distance of 169.90 feet to a point; THENCE N80°11'07"E for a distance of 132.29 feet to a point; THENCE S55°19'17"E for a distance of 200.09 feet to a point; THENCE S75°46'58"E for a distance of 218.22 feet to a point; THENCE S56°12'48"E for a distance of 229.02 feet to a point; THENCE S78°49'49"E for a distance of 202.90 feet to a point; THENCE N55°45'27"E for a distance of 191.04 feet to a point; THENCE N49°00'07"E for a distance of 178.25 feet to a point; THENCE N53°04'23"E for a distance of 228.09 feet to a point; THENCE N59°49'50"E for a distance of 216.65 feet to a point; THENCE N46°16'19"E for a distance of 191.93 feet to a point; THENCE N25°54'56"E for a distance of 279.09 feet to a point; THENCE N28°56'27"E for a distance of 262.79 feet to a point; THENCE N42°07'56"E for a distance of 314.56 feet to a point; THENCE N32°09'21"E for a distance of 233.70 feet to a point; THENCE N44°21'43"E for a distance of 205.65 feet to a point; THENCE N43°17'49"E for a distance of 266.80 feet to a point; THENCE N54°11'37"E for a distance of 320.60 feet to a point; THENCE N43°34'33"E for a distance of 236.87 feet to a point; THENCE N21°46'53"E for a distance of 308.90 feet to a point; THENCE N09°16'07"E for a distance of 208.62 feet to a point; THENCE N30°46'26"E for a distance of 197.70 feet to a point; THENCE N24°46'32"E for a distance of 234.84 feet to a point; THENCE S64°04'39"W for a distance of 126.75 feet to a point; THENCE S78°05'02"W for a distance of 380.77 feet to a point; THENCE S81°33'57"W for a distance of 339.28 feet to a point; THENCE N87°20'39"W for

a distance of 231.58 feet to a point; THENCE S88°16'42"W for a distance of 309.72 feet to a point; THENCE N78°41'45"W for a distance of 187.24 feet to a point; THENCE N40°20'23"W for a distance of 193.55 feet to a point; THENCE N21°24'24"E for a distance of 228.01 feet to a point; THENCE N02°55'05"E for a distance of 212.63 feet to a point; THENCE N03°51'48"E for a distance of 350.45 feet to a point; THENCE N00°20'07"E for a distance of 155.37 feet to a 1" pipe; THENCE leaving the run of said branch, S84°06'59"W for a distance of 1,283.58 feet to a 5/8" rebar on the Eastern right-of-way (40') of Mill Branch Club Rd.; THENCE N07°16'32"E for a distance of 1,076.79 feet along said 40' right-of-way to a point; THENCE along a curve to the left having an arc distance of 722.63 feet and a radius of 6,620.00 feet being subtended by a chord of N04°08'54"E for a distance of 722.27 feet along said 40' right-of-way to a point; THENCE N01°01'16"E for a distance of 472.44 feet along said 40' right-of-way to a point; THENCE along a curve to the right having an arc distance of 53.93 feet and a radius of 40.00 feet being subtended by a chord of N39°38'47"E for a distance of 49.94 feet along said 40' right-of-way to a point; THENCE N78°16'18"E for a distance of 581.05 feet along the Southern right-of-way (40') of Old Donaldson School Rd. to a 5/8" rebar; THENCE S12°59'19"W for a distance of 219.27 feet to a 5/8" rebar; THENCE N80°17'24"E for a distance of 847.20 feet to a 1" pipe; THENCE N05°45'32"E for a distance of 240.12 feet to a 5/8" rebar on the Southern right-of-way (40') of Old Donaldson School Rd.; THENCE N75°13'39"E for a distance of 225.69 feet along said 40' right-of-way to a point; THENCE along a curve to the right having an arc distance of 424.60 feet and a radius of 730.00 feet being subtended by a chord of S88°06'35"E for a distance of 418.64 feet along said 40' right-of-way to a point; THENCE S71°26'49"E for a distance of 484.45 feet along said 40' right-of-way to a point; THENCE along a curve to the left having an arc distance of 857.74 feet and a radius of 700.00 feet being subtended by a chord of N73°26'59"E for a distance of 805.07 feet along said 40' right-of-way to a point; THENCE N38°20'47"E for a distance of 962.94 feet along said 40' right-of-way to a point; THENCE N42°44'28"E for a distance of 374.29 feet along said 40' right-of-way to a point; THENCE N39°04'27"E for a distance of 1,526.84 feet along said 40' right-of-way to a point in the run of a branch; THENCE the following courses along the run of a branch, S80°09'58"E for a distance of 30.05 feet to a steel fence post; THENCE S74°20'38"E for a distance of 131.38 feet to a point; THENCE S64°30'39"E for a distance of 236.58 feet to a point; THENCE S50°51'01"E for a distance of 277.32 feet to a point; THENCE S68°00'15"E for a distance of 181.96 feet to a point; THENCE S31°28'36"E for a distance of 264.61 feet to a point; THENCE S57°08'11"E for a distance of 298.95 feet to a point; THENCE S76°29'53"E for a distance of 180.84 feet to a point; THENCE N31°45'29"E for a distance of 206.77 feet to a point; THENCE N32°14'43"E for a distance of 124.83 feet to a point; THENCE S67°05'36"E for a distance of 73.76 feet to a point; THENCE S87°14'26"E for a distance of 205.36 feet to a point; THENCE N27°40'25"E for a distance of 198.61 feet to a point; THENCE N65°53'35"E for a distance of 230.63 feet to a point; THENCE N07°22'59"E for a distance of 220.49 feet to a point; THENCE N54°42'34"E for a distance of 179.80 feet to a point; THENCE S81°01'14"E for a distance of 159.95 feet to a point; THENCE N52°07'48"E for a distance of 298.68 feet to a point; THENCE N26°14'42"E for a distance of 208.16 feet to a point; THENCE N15°50'46"E for a distance of 246.79 feet to a point; THENCE N39°57'04"E for a distance of 292.56 feet to a point; THENCE N53°34'47"E for a distance of 258.46 feet to a point; THENCE N64°27'25"E for a distance of 277.38 feet to a point; THENCE N24°07'36"E for a distance of 206.58 feet to a point; THENCE N21°45'45"E for a distance of 293.60 feet to a point; THENCE N75°45'07"E for a distance of 172.41 feet to a point; THENCE N27°51'55"E for a distance of 89.00 feet to a 5/8" rebar; THENCE leaving said run of branch, S55°27'10"E point for a distance of 2,713.95 feet to a 5/8" rebar; THENCE S55°27'10"E for a distance of 1,312.32 feet to a 5/8" rebar; THENCE N35°41'37"E for a distance of 1,446.93 feet to a 1/2" pipe; THENCE N34°40'41"E for a distance of 74.72 feet to the Point of Beginning of this Parcel.

Less and Except from the above described Parcel the following, beginning at a 1" pipe, having State Plane Coordinates of N=796,805.67' and E=806,112.84', said point being the Point of Beginning of this parcel; THENCE S65°39'52"W for a distance of 528.04 feet to a 4x4 concrete monument; THENCE N25°06'06"W for a distance of 676.96 feet to a 3/4" iron in the run of a branch; THENCE N51°11'02"E for a distance of 69.14 feet along the run of branch to a point; THENCE N83°07'57"E for a distance of 342.52 feet along the run of branch to a point; THENCE N58°11'00"E for a distance of 144.79 feet along the run of branch to a 1" pipe; THENCE S24°19'23"E for a distance of 610.22 feet to the Point of Beginning of this Parcel, Said out parcel containing 7.783 acres, more or less.

Thus leaving a total of 3,844.550 acres, more or less for Tract No. 1.

LEGAL DESCRIPTION TRACT No. 2

All that tract of parcel of land lying and being in the 1803<sup>rd</sup>. G.M.D. of Bulloch County, Georgia, being more particularly described as follows;

Beginning at a 1" iron located on the Western right-of-way (40') of Mill Branch Club Rd. having State Plane Coordinates of N=790,022.73' and E=790,976.64', said point being the Point of Beginning of this parcel;

THENCE N35°38'34"W for a distance of 3,762.40 feet to a painted corner tree in the run of branch; THENCE the following courses along the run of branch, N48°55'57"E for a distance of 199.84 feet to a point; THENCE N62°42'59"E for a distance of 214.19 feet to a point; THENCE N82°49'39"E for a distance of 290.21 feet to a point; THENCE N64°33'45"E for a distance of 223.76 feet to a point; THENCE N20°07'01"E for a distance of 177.82 feet to a point; THENCE N84°04'14"E for a distance of 138.87 feet to a point; THENCE N66°27'07"E for a distance of 102.20 feet to a 5/8" rebar on said 40' right-of-way; THENCE leaving said run of branch, along a curve to the left, having an arc distance of 348.60 feet and a radius of 570.00 feet being subtended by a chord of S02°44'21"E for a distance of 343.19 feet along said 40' right-of-way to a point; THENCE S20°15'33"E for a distance of 589.23 feet along said 40' right-of-way to a point; THENCE S20°05'34"E for a distance of 1,471.35 feet along said 40' right-of-way to a point; THENCE S19°05'43"E for a distance of 473.18 feet along said 40' right-of-way to a point; THENCE S20°11'12"E for a distance of 408.90 feet along said 40' right-of-way to a point; THENCE along a curve to the right having an arc distance of 142.14 feet and a radius of 430.00 feet being subtended by a chord of S10°43'01"E for a distance of 141.49 feet along said 40' right-of-way to a point; THENCE S01°14'50"E for a distance of 241.37 feet along said 40' right-of-way to a point; THENCE S05°38'05"E for a distance of 153.66 feet along said 40' right-of-way to the Point of Beginning of this Parcel.

Containing 55.519 acres, more or less.

LEGAL DESCRIPTION TRACT No. 3

All that tract or parcel of land lying and being in the 1340<sup>th</sup>. G.M.D. of Bulloch County, Georgia, being more particularly described as follows;

Commencing at a PK Nail at the apparent centerline intersection of pavement of GA. Hwy. No. 67 and Owens Road, having State Plane Coordinates of N=802,908.40 and E=804,217.48; THENCE N40°22'01"E for a distance of 66.09 feet to 5/8" rebar at the intersection of the Eastern right-of-way (100') of GA. Hwy. No. 67 and the Northern right-of-way (80') of Owens Road, having State Plane Coordinates of N=802,958.76 and E=804,260.29', this being the Point of Beginning of this Parcel;

THENCE along a curve to the right having an arc distance of 613.31 feet and a radius of 3,750.00 feet being subtended by a chord of N03°50'07"W for a distance of 612.62 feet along said 100' right-of-way to a point; THENCE N00°31'22"E for a distance of 289.36 feet along said 100' right-of-way to a 1" pipe; THENCE N01°19'57"E for a distance of 273.34 feet along said 100' right-of-way to a 1" pipe; THENCE N27°12'46"E for a distance of 1,914.22 feet to a grader blade; THENCE N37°07'08"E for a distance of 484.79 feet to a 3/4" pipe; THENCE N37°07'08"E for a distance of 1,176.99 feet to a 1" pipe; THENCE S57°25'26"E for a distance of 1,001.07 feet to a 5/8" rebar; THENCE S63°34'18"E for a distance of 3,042.72 feet to a 2" axle; THENCE S41°50'04"W for a distance of 1,249.65 feet to a 1" pipe; THENCE S12°50'15"E for a distance of 771.42 feet to a 1" pipe; THENCE S79°38'02"W for a distance of 36.29 feet to a 1" pipe; THENCE S14°21'35"E for a distance of 360.73 feet to a 5/8" rebar on the Northern right-of-way (80') of Owens Rd.; THENCE N86°53'13"W for a distance of 747.09 feet along said 80' right-of-way a point; THENCE along a curve to the right, having an arc distance of 599.41 feet and a radius of 2,060.00 feet being subtended by a chord of N78°30'38"W for a distance of 597.30 feet along said 80' right-of-way to a point; THENCE N70°10'29"W for a distance of 333.88 feet along said 80' right-of-way to a point; THENCE along a curve to the left having an arc distance of 565.17 feet and a radius of 990.00 feet being subtended by a chord of N86°31'45"W for a distance of 557.53 feet along said 80' right-of-way to a point; THENCE S77°06'59"W for a distance of 368.63 feet along said 80' right-of-way to a point; THENCE S77°36'34"W for a distance of 2,298.48 feet along said 80' right-of-way to the Point of Beginning of this Parcel.

Containing 316.343 acres, more or less.



LEGAL DESCRIPTION TRACT No. 4

All that tract or parcel of land lying and being in the 1340<sup>th</sup>. G.M.D. of Bulloch County, Georgia, being more particularly described as follows;

Commencing at a PK Nail at the apparent centerline intersection of pavement of GA. Hwy. No. 67 and Owens Road, having State Plane Coordinates of N=802,908.40 and E=804,217.48;; THENCE S62°37'20"E for a distance of 62.53 feet to 5/8" rebar at the intersection of the Eastern right-of-way (100') of Georgia Hwy. No. 67 and the Southern right-of-way (80') of Owens Rd., having State Plane Coordinates of N=802,879.65 and E=804,273.01, this being the Point of Beginning of this Parcel;

THENCE N77°36'34"E for a distance of 2,303.38 feet along said 80' right-of-way to a point; THENCE N77°06'59"E for a distance of 368.98 feet said 80' right-of-way to a point; THENCE along a curve to the right having an arc distance of 519.50 feet and a radius of 910.00 feet being subtended by a chord of S86°31'45"E for a distance of 512.47 feet along said 80' right-of-way to a point; THENCE S70°10'29"E for a distance of 333.88 feet along said 80' right-of-way to a point; THENCE along a curve to the left having an arc distance of 625.69 feet and a radius of 2,140.00 feet being subtended by a chord of S78°33'02"E for a distance of 623.46 feet along said 80' right-of-way to a point; THENCE S86°53'13"E for a distance of 746.28 feet along said 80' right-of-way to a point to a 5/8" rebar; THENCE S26°09'34"E for a distance of 53.65 feet to a 5/8" rebar; THENCE S14°43'03"E for a distance of 341.85 feet to a 5/8" rebar; THENCE S24°58'50"E for a distance of 97.15 feet to a 4x4 concrete monument; THENCE S15°52'43"E for a distance of 628.33 feet to a 1/2" rebar; THENCE S15°54'11"E for a distance of 894.99 feet to a 1" pipe; THENCE N74°42'07"E for a distance of 731.61 feet to a 1/2" rebar; THENCE S20°26'24"E for a distance of 920.24 feet to a 1" pipe; THENCE S20°26'24"E for a distance of 10.98 feet to a point in the run of a branch; THENCE the following courses along the run of said branch; S39°19'31"W for a distance of 59.92 feet to a point; THENCE S00°00'13"E for a distance of 232.56 feet to a point; THENCE S64°05'33"W for a distance of 200.26 feet to a point; THENCE S67°14'59"W for a distance of 199.75 feet to a point; THENCE N88°02'28"W for a distance of 164.17 feet to a point; THENCE S30°21'47"W for a distance of 242.00 feet to a point; THENCE S78°23'04"W for a distance of 263.73 feet to a point; THENCE S31°22'58"W for a distance of 80.79 feet to a point; THENCE S35°41'46"W for a distance of 213.31 feet to a point; THENCE S67°19'27"W for a distance of 283.83 feet to a point; THENCE S15°18'19"W for a distance of 200.50 feet to a point; THENCE S07°00'41"W for a distance of 233.89 feet to a point; THENCE S55°44'20"W for a distance of 119.78 feet to a point; THENCE S69°34'01"W for a distance of 155.48 feet to a point; THENCE S05°14'12"E for a distance of 128.14 feet to a point; THENCE S49°44'41"W for a distance of 100.58 feet to a point; THENCE S70°46'01"W for a distance of 188.19 feet to a point; THENCE N88°27'54"W for a distance of 230.77 feet to a point; THENCE N67°56'22"W for a distance of 176.71 feet to a point; THENCE S17°40'31"W for a distance of 90.48 feet to a point; THENCE S87°26'02"W for a distance of 159.23 feet to a point; THENCE N73°11'24"W for a distance of 185.04 feet to a point; THENCE N81°47'31"W for a distance of 208.45 feet to a point; THENCE N85°43'19"W for a distance of 187.19 feet to a point; THENCE S53°24'12"W for a distance of 156.53 feet to a point; THENCE S78°34'03"W for a distance of 209.54 feet to a point; THENCE S30°38'33"W for a distance of 121.26 feet to a 4x4 concrete monument; THENCE leaving said run of branch, N64°12'29"W for a distance of 146.34 feet to a 1/2" rebar; THENCE N70°10'16"W for a distance of 438.42 feet to a 4x4

concrete monument; THENCE  $S48^{\circ}43'01''W$  for a distance of 120.20 feet to a 4x4 concrete monument; THENCE  $S10^{\circ}33'08''W$  for a distance of 363.23 feet to a 4x4 concrete monument; THENCE  $S31^{\circ}56'30''W$  for a distance of 568.50 feet to a 4x4 concrete monument on the Eastern right-of-way (100') of GA. Hwy. No. 67; THENCE  $N21^{\circ}22'36''W$  for a distance of 1,526.38 feet along said 100' right-of-way to a point; THENCE  $N21^{\circ}24'08''W$  for a distance of 1,843.39 feet along said 100' right-of-way to a point; THENCE  $N21^{\circ}21'27''W$  for a distance of 1,285.80 feet along said 100' right-of-way to a point; THENCE along a curve to the right having an arc distance of 760.03 feet and a radius of 3,750.00 feet being subtended by a chord of  $N15^{\circ}33'05''W$  for a distance of 758.73 feet along said 100' right-of-way to the Point of Beginning of this Parcel.

Containing 499.109 acres, more or less.

EXHIBIT B - INGRESS/EGRESS

ACCESS TO THE 4,715.52 ACRES PARCEL IS VIA STATE HWY 67 IN BULLOCH COUNTY, GA

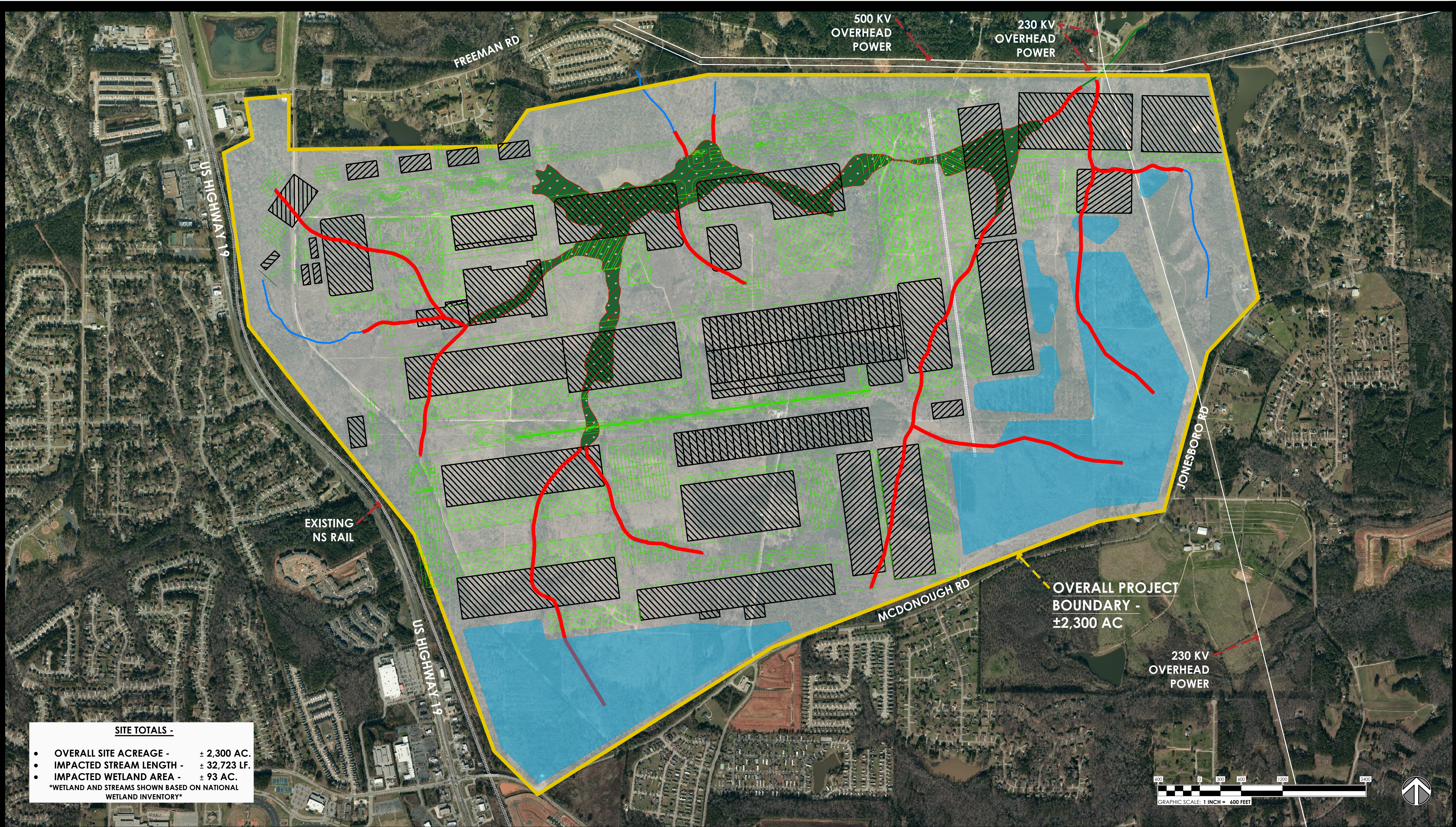
11/15/2023 10:00:00 AM

EXHIBIT C

NONE

EXHIBIT D

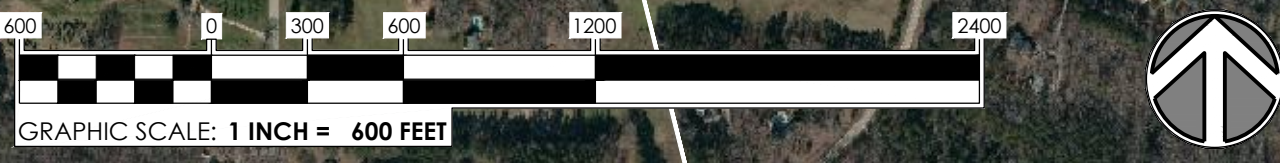
NONE



**SITE TOTALS -**

- **OVERALL SITE ACREAGE -** ± 2,300 AC.
- **IMPACTED STREAM LENGTH -** ± 32,723 LF.
- **IMPACTED WETLAND AREA -** ± 93 AC.

\*WETLAND AND STREAMS SHOWN BASED ON NATIONAL WETLAND INVENTORY\*



PREPARED FOR:

OFFSITE ALTERNATIVE IMPACT MAP  
**ALTERNATIVE #4**  
 CLAYTON COUNTY / GA

September 22, 2022



50 Park of Commerce Way  
 Savannah, GA 31405 • 912.234.5300

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This map illustrates a general plan of the development which is for discussion purposes only, does not limit or bind the owner/developer, and is subject to change and revision without prior written notice to the holder. Dimensions, boundaries and position locations are for illustrative purposes only and are subject to an accurate survey and property description.  
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September 2022

## 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 proposed EVOEM includes the following:
    - Approximately 1600 Acres: This acreage includes production components including form pressing, fabrication, painting, product completion/assembly, quality control and special products production. The required distribution components include a train/rail 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.

- Approximately 170 Acres: Stormwater management facilities suitable in size to meet the Georgia Stormwater Management Manual standards for Post Development Total Suspended Solids and/or Stormwater Run-off Reduction and Water Quality Protection.
  - Approximately 80 Acres: This acreage includes the road network within and transportation access within the site required to support the manufacturing facility.
  - Approximately 250 Acres: The perimeter of the facility totals approximately 40,000 linear feet. This acreage includes area required for grading and for facility buffers off the project boundary totaling 250-500 linear feet.
- 
- 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 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 and construction challenges. First, the providing rail to the site would require construction of 2.3 to 3.5 miles of new rail line (depending on route). Second, the new rail line would cross three public roads including White Road, Old Highway 41 and Joe Frank Harris Parkway. Due to traffic safety concerns and frequency of rail use, these crossings would require construction of an overpass for each crossing. Lastly, the new rail corridor would impact anywhere from 12 to 50 or more private properties. These properties currently contain single family residential developments, agricultural parcels, educational facilities and commercial parcels. For this reason, this alternative is not logistically feasible.
- 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 capable of being done considering logistics for the following reason:
  - 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 however it is assumed that improvements to existing public roads could meet the traffic needs of the project. 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 meet the basic project purpose which is to construct an EVOEM assembly 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, Off-Site Alternative 4 meets all site screening criteria and is therefore 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 U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) Agricultural Conservation Easement Program Wetland Reserve Easement which prohibits any development activities within the property. As documented in the easement the landowner is required by the Federal Government to comply with the following:

*PART III. Obligations of the Landowner. The Landowner shall comply with all terms and conditions of this Easement, including the following:*

*A. Prohibitions. Without otherwise limiting the rights of the United States acquired hereunder, it is expressly understood that the rights to carry out the following activities and uses have been acquired by the United States and, unless authorized by the United States under Part IV, are prohibited on the Easement Area:*

- 1. haying, mowing, or seed harvesting for any reason;*
- 2. altering of grassland, woodland, wildlife habitat or other natural features by burning, digging, plowing, disking, cutting or otherwise destroying the vegetative cover;*
- 3. accumulating or dumping refuse, wastes, sewage, or other debris;*
- 4. harvesting wood or sod products;*
- 5. draining, dredging, channeling, filling, leveling, pumping, diking, impounding, or related activities, as well as altering or tampering with water control structures or devices, except as specifically set forth in EXHIBIT D, if applicable;*
- 6. diverting or causing or permitting the diversion of surface or underground water into, within, or out of the Easement Area by any means, except as specifically set forth in EXHIBIT D, if applicable;*
- 7. building, placing, or allowing to be placed structures on, under, or over the Easement Area; except for individual semi-permanent hunting or observation blinds for undeveloped recreational uses the external dimensions of which will be no more than 80 square feet and 8 feet in height, with the number, locations, and features of blinds approved by NRCS under Part IV;*
- 8. planting or harvesting any crop;*
- 9. grazing or allowing livestock on the Easement Area;*
- 10. disturbing or interfering with the nesting or brood-rearing activities of wildlife including migratory birds;*
- 11. use of the Easement Area for developed recreation. These uses include but are not limited to, camping facilities, recreational vehicle trails and tracks, sporting clay operations, skeet shooting operations, firearm range operations and the infrastructure to raise, stock, and release captive raised waterfowl, game birds and other wildlife for hunting or fishing;*
- 12. any activities which adversely impact or degrade wildlife cover or other habitat benefits, water quality benefits, or other wetland functions and values of the Easement Area; and*

*13. any activities to be carried out on the Landowner's land that is immediately adjacent to, and functionally related to, the Easement Area if such activities will alter, degrade, or otherwise diminish the functional value of the Easement Area.*

A copy of the easement is attached.

- 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. Rail service is not located adjacent to the site and extension of rail access would require significant property acquisition and construction challenges. First, the providing rail to the site would require construction of 1.7 to 2.8 miles of new rail line (depending on route). Second, the new rail line would cross three public roads including Highway 280, Beautiful Zion Church Cemetery Road and Bulloch Bay Road. Due to traffic safety concerns and frequency of rail use, construction of an overpass on Highway 280 would be required. Lastly, the new rail corridor would impact anywhere from 4 to 15 or more private properties.
- 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	Yes	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	Yes	No	No	No	Yes	Yes	No
Meets overall project purpose	Yes	No	No	No	Yes	No	No	No	Yes	Yes	No
<b>Practicable (Y or N)</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>

**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 NWI, the project would impact 246 acres of aquatic resources. Based on the approved aquatic resources delineation, 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 Off-Site Alternative 4:** A summary of environmental impacts associated with Off-Site Alternative 4 is provided below.

- Stream Impacts (quantitative). Based the NWI, the proposed project would require 32,723 linear feet of intermittent and perennial 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 NWI and location of aquatic resources and assembly facility design, this alternative would require 93 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.

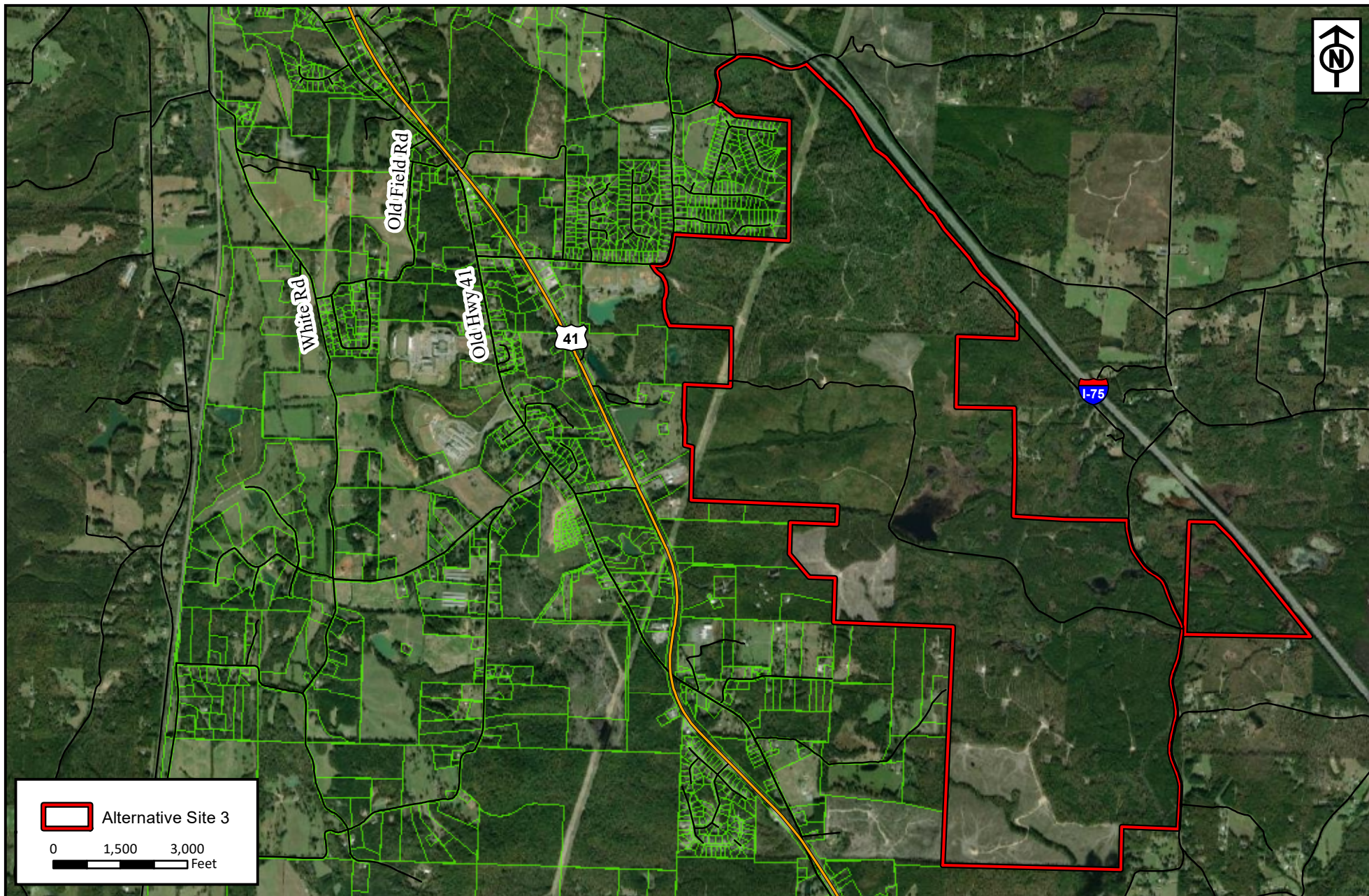
- Stream Buffer Impact. The proposed project will require impacts to state waters and stream buffers. A stream buffer variance will be obtained from the GADNR-EPD prior to initiation of buffer impacts.

**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**

<b>FACTORS</b>	<b>Preferred Alternative &amp; Configuration</b>	<b>Off-Site Alternative 4</b>	<b>On-Site Conf 1</b>	<b>On-Site Conf 2</b>
<b>Environmental Factors</b>				
Stream Impacts (Linear Feet) (NWI/Delineation)	5,100/763	32,723/na	5,100/763	5,100/763
Functional Value of Impacted Stream	Moderate	Moderate	Moderate	Moderate
Wetland Impacts (Acres) (NWI/Delineation)	246/220.76	93/na	249.14	418.64
Functional Value of Impacted Wetland	Moderate	Moderate	Moderate	Moderate
Impacts to Other Waters (Acres)	1.58	0.0	6.51	6.51
Functional Value of Impacted Other Waters	Low	Low	Low	Low
Federal Endangered Species Impact	No	No	No	No
Cultural Resources Impact	No	No	No	No
<b>LEDPA</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>

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. While the Applicants Preferred Alternative site requires 246 acres of NWI wetland impact and 5,100 linear feet (less than one mile) of stream impact, this alternative did not experience any additional challenges associated with the initial site screening criteria. Conversely, Off-Site Alternative 4 requires 93 acres of NWI wetland impact and 32,723 linear feet (over 6 miles) of NWI stream impact and faces access challenges and requires significant road improvements that could conflict with existing residential and commercial development that surrounds the site. For this reason, the Applicants Preferred Alternative was determined to be the least damaged practicable alternative.



RLC Project No.:	14-225.7
Figure No.:	1
Prepared By:	MG
Sketch Date:	9/22/2022
Map Scale :	1 inch = 3,000 feet

### Alternative Site 3

Bartow County, Georgia

### Rail Access Exhibit

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



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