



Environmental Assessment
Colonel's Island Terminal Flood Mitigation Project
Georgia Ports Authority
Brunswick, Glynn County, Georgia
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List of Acronyms, Chemical Formulas, and Abbreviations

ACS	American Community Survey
AHPA	Archaeological and Historic Preservation Act
AIRFA	American Indian Religious Freedom Act
APE	Area of Potential Effect
BCA	Benefit Cost Analysis
BMP	Best Management Practice
CFR	Code of Federal Regulations
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CIT	Colonel's Island Terminal
CMPA	Coastal Marshlands Protection Act
CO	Carbon Monoxide
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
dB	Decibel
EA	Environmental Assessment
EO	Executive Order
EHP	Environmental and Historic Preservation
EPA	Environmental Protection Agency
EPD	Georgia Environmental Protection Division
ESA	Endangered Species Act
ESCP	Erosion and Sediment Control Plan
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FIS	Flood Insurance Study
FONSI	Finding of No Significant Impact
GADNR	Georgia Department of Natural Resources
GASF	Georgia Archaeological Site File
GNAHRGIS	Georgia's Natural, Archeological, and Historic Resources Geographic Information System
GPA	Georgia Ports Authority
HMGP	Hazard Mitigation Grant Program
HUC	Hydrologic Unit Maps
ICIS	Integrated Compliance Information System

IPaC	Information for Planning and Consultation
LiMWA	Limit of Moderate Wave Action
LOMR	Letter of Map Revision
MSL	Mean Sea Level
NAAQS	National Ambient Air Quality Standards
NCA	Noise Control Act
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NO ₂	Nitrogen Dioxide
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O ₃	Ozone
OSHA	Occupational Safety and Health Act
Pb	Lead
PM ₁₀	Particulate matter
RCRA	Resource Conservation and Recovery Act
ROW	Right-of-way
SHPO	State Historic Preservation Office
SO ₂	Sulfur Dioxide
TCP	Traditional Cultural Property
TCSA	Toxic Substances Control Act
THPO	Tribal Historic Preservation Office
TWIC	Transportation Worker Identity Card
USACE	United States Army Corps of Engineers
U.S.C.	United States Code
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
WOTUS	Waters of the United States

Table of Contents

SECTION ONE: BACKGROUND.....	6
1.1 Project Authority	6
1.2 Project Location	7
1.3 Purpose and Need	7
1.4 Existing Facility.....	7
SECTION TWO: ALTERNATIVES ANALYSIS	8
2.1 Alternative 1 – No Action.....	8
2.2 Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)..	9
2.3 Alternatives Considered and Eliminated from Further Consideration.....	10
SECTION THREE: AFFECTED ENVIRONMENT AND CONSEQUENCES.....	11
Preliminary Screening of Assessment Categories	11
This section discusses environmental resources and details the assessments performed. The resources were evaluated via a preliminary desktop screening based on project area description and available information. Coastal Barrier Resources Act (CBRA) was not applicable as the project footprint is not located in a designated CBRA zone. In addition, the Migratory Birds Treaty Act (MBTA) section has no affect because there will be no vertical construction, bridge activities, and no potential of take to migratory bird species. Results from the preliminary desktop screening shown that CBRA and MBTA are to be eliminated from further review.....	11
3.1 Physical Environment.....	11
3.1.1 Geology, Seismicity, and Soils	11
Alternative 1 – No Action	12
Alternative 2 –Elevate Parcel B within the Existing Footprint (Proposed Action)	12
3.1.2 Water Resources and Water Quality	12
Alternative 1 – No Action	13
Alternative 2 - Elevate Parcel B within the Existing Footprint (Proposed Action)	13
3.1.3 Floodplain Management (Executive Order 11988).....	14
Alternative 1 – No Action	15
Alternative 2– Elevate Parcel B within the Existing Footprint (Proposed Action)	15
3.1.4 Air Quality	15
Alternative 1 – No Action	16
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	16
3.1.5 Coastal Zone Management	16
Alternative 1 – No Action	17
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	17
3.2 Biological Environment	17
3.2.1 Terrestrial and Aquatic Environment	17
Alternative 1 – No Action	17

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	17
3.2.2 Wetlands (Executive Order [EO] 11990).....	18
Alternative 1 – No Action	18
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	18
3.2.3 Threatened and Endangered Species	18
Alternative 1 – No Action	19
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	20
3.3 Hazardous Materials	23
Alternative 1 – No Action	24
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	24
3.4 Socioeconomics	25
3.4.1 Zoning and Land Use	25
Alternative 1 – No Action	25
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	25
3.4.2 Visual Resources	25
Alternative 1 – No Action	25
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	26
3.4.3 Noise	26
Alternative 1 – No Action	26
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	26
3.4.4 Public Services and Utilities.....	26
Alternative 1 – No Action	27
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	27
3.4.5 Traffic and Circulation	27
Alternative 1 – No Action	27
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	27
3.4.6 Environmental Justice (Executive Order 12898).....	28
Alternative 1 – No Action	28
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	28
3.4.7 Safety and Security	29
Alternative 1 – No Action	29
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	29
3.5 Historic and Cultural Resources	30
Alternative 1 – No Action	31
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	31
3.5.1 Historic Structures.....	31
Alternative 1 – No Action	31
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	32
3.5.2 Archaeological Resources	32
Alternative 1 – No Action	32
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	32
3.5.3 Tribal Coordination and Religious Sites	32
Alternative 1 – No Action	33
Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)	33
3.6 Comparison of Alternatives	34

SECTION FOUR: CUMULATIVE IMPACTS	1
SECTION FIVE: PUBLIC PARTICIPATION	1
SECTION SIX: MITIGATION MEASURES AND PERMITS	1
SECTION SEVEN: CONSULTATIONS AND REFERENCES	3
Consultation.....	3
References	3
SECTION EIGHT: LIST OF PREPARERS	4
APPENDICES.....	4
Appendix A Maps and Figures	4
Appendix B Agency Correspondence	4
Appendix C Public Notice	4
Appendix D Public Comments	4

SECTION ONE: BACKGROUND

1.1 Project Authority

The objective of the Federal Emergency Management Agency's (FEMA) Hazard Mitigation Grant Program (HMGP) is to aid communities in implementing hazard mitigation measures to reduce or eliminate long term risk to people and property following a Presidential declared disaster. The HMGP is authorized under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5170c to assist in the recovery and resiliency of affected communities. Under a major disaster declaration (FEMA-4284-DR-GA) signed by the President on October 8, 2016 (and amended on October 15, 2016, October 17, 2016, and October 20, 2016), the following counties were adversely affected by the disaster and eligible for Individual Assistance (IA): Bryan, Bulloch, Chatham, Effingham, Evans, Glynn, Liberty, Long, McIntosh, and Wayne; and for Public Assistance (PA), Categories A-G: Brantley, Bryan, Bulloch, Camden, Candler, Chatham, Effingham, Emanuel, Evans, Glynn, Jenkins, Liberty, Long, McIntosh, Pierce, Screven, Tattnall, Toombs, Ware, and Wayne. The Hazard Mitigation Grant Program (HMGP) was available statewide. Funding obligations for DR-4284 totaled \$95,526,313.18 for Public Assistance and \$6,611,177.87 for Individual Assistance.

The proposed flood mitigation project for Colonel's Island Terminal (CIT), (Parcel B) is a high priority project (Item #130) in the 2019 State of Georgia Hazard Mitigation Plan, approved by FEMA (see Project Location Map in **Appendix A**). Southeast Georgia experienced two Presidentially declared disasters within less than two years, Hurricane Matthew in October 2016 (DR-4284) and Hurricane Irma in September 2017 (DR-4338) with each resulting in extensive flooding in coastal Georgia. FEMA will be funding the proposed project under the grant number HMGP 4284-0059-R. The total approved cost for this project is \$508,095.00 with a federal share of \$381,071.25, equating to 75 percent of total project costs, and a local share of \$127,023.75, equating to 25 percent of total project costs. The Period of Performance for Phase I of the project extends to April 5, 2022 (see GPA application in **Appendix B**).

In accordance with the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations (CFR) Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR § 10), FEMA must fully understand and consider the environmental consequences of actions proposed for federal funding. The purpose of this Environmental Assessment (EA) is to meet FEMA's responsibilities under NEPA and to determine whether to prepare a Finding of No Significant Impact (FONSI) or a Notice of Intent (NOI) to prepare an Environmental Impact Statement for the proposed project.

This EA examines the following topics: the purpose and need for the proposed project; other alternatives that have been considered; the environmental effects of the Proposed Action

alternative and other alternatives; and input provided by consultation through public and agency involvement processes.

1.2 Project Location

The proposed 19.9-acre project is located at the CIT, in Glynn County, Georgia (Latitude. 31.1265 N, Longitude.-81.5335 W), along the Brunswick River, just inland from the coast. In 2020, the population of the Brunswick was approximately 16,000 people.¹ Brunswick is the administrative center for Glynn County. The proposed project area (Parcel B) boundaries include Joe Frank Harris Boulevard on the northwest boundary for 930 feet, parking lot (Parcel A) on the southwest edge for approximately 800 feet, a tidal marsh approximately 960 feet along the southeastern border and 1,000 feet along the northeastern edge, and the Brunswick River to the north/northeast.(see Project Location Map and Regional Map included in **Appendix A**).

1.3 Purpose and Need

The Georgia Ports Authority (GPA; subrecipient) owns and operates the CIT, one of three terminals located at the Port of Brunswick, which is the nation's second busiest port for import and export of automobile cargo. The need for this project is for GPA to have a reliable space at Parcel B to store and process automobile units with minimal to no flooding damages. The CIT experienced significant flooding that damaged thousands of automobile units. An estimated 7,000 units were damaged on the paved areas of Parcel B and surrounding parcels. The Parcel B parking lot received severe flood damage due to its relatively low elevation as compared to adjacent parcels. The purpose of the action alternatives presented in this EA is to consider alternatives that would reduce the risk of flooding and property loss and the associated threats to human health, safety, and welfare. These are consistent with the objectives of FEMA's HMGP to reduce the impact of natural disasters on the built environment.

In accordance with federal laws and FEMA regulations, the EA process for a proposed federal action must include an evaluation of alternatives and a discussion of the potential environmental impacts. This EA was prepared in accordance with FEMA's regulations, federal laws and executive orders as required under NEPA. It also addresses an evaluation of alternatives and a discussion of the potential environmental impacts for the proposed federal action.

1.4 Existing Facility

Georgia Ports Authority owns and leases one of the nation's largest auto facilities, CIT facilitates the import and export of automobiles and heavy machinery to locations throughout the world. The CIT consists of approximately 2,000 acres with an estimate of 1,325 acres for vehicular processing (see **Appendix B** for original and amended GPA application). The proposed project area was constructed in 1992 and is strictly used for maritime commercial purposes. Parcel B parking lot is comprised of a

¹ <https://data.census.gov/cedsci/table?q=Brunswick,%20GA&tid=ACSDP5Y2020.DP05>

combination of asphalt and concrete paving and has an average elevation of 7 feet (NAVD88 State Plane Coordinates). It is zoned as industrial use consisting of more than 4,000 parking spaces and includes supporting features such as a 418 square foot aluminum carport with two electrical vehicle charging stations and an electrical panel. Also, a barbed wire chain link security fence borders most of Parcel B’s perimeter. There are no residential facilities or structures.

SECTION TWO: ALTERNATIVES ANALYSIS

The subrecipient is required to provide alternatives that would meet the need and purpose of minimizing the potential for future flood damage to property occupying Parcel B and describe the environmental impacts of each alternative. Any number of alternatives could be included if they address the purpose and need and prove to be feasible. Four alternatives are presented for this project: the No Action Alternative (Alternative 1), the Proposed Action alternative (Alternative 2), and two alternatives that were considered but dismissed (Alternatives 3 and 4). Each of the alternatives are summarized in **Table 1** below.

Table 1: Summary of Alternatives Analysis

Alternative	Brief Description
Alternative 1: No Action	No activity would occur and therefore Parcel B would be subject to future flooding in the current condition.
Alternative 2: Elevate Parcel B within the Existing Footprint	Raise the footprint of Parcel B three (3) feet and minimize potential for future flooding. Would address project purpose and need.
Alternatives Considered and Eliminated from Further Consideration	
Alternative 3: Construct Elevated Parking Deck Over Parcel B	Construct an elevated concrete parking deck above the existing parking lot to avoid future flooding; design and construction would take more time to complete; cost prohibitive based on program criteria. This alternative would also introduce negative effects to the infrastructure adjacent to the proposed project area.
Alternative 4: Alternate Site Located Outside the Floodplain	Retain Parcel B as is and use an off-site (off-CIT) location for automobile storage. Alternative does not meet the benefit of CIT access and would require acquisition of additional property, which is not cost effective and would be cost prohibitive based on program criteria; it would also require negotiation above and beyond the scale and scope of this project.

2.1 Alternative 1 – No Action

Under the No Action alternative, there would be no action taken. Parcel B would not be elevated and risks to property, human health, and safety associated with flood events would continue. In addition, as seen in the 2016 and 2017 floods, thousands of automobiles (an estimated 7,000 units) would continue to be damaged during significant flooding events. This alternative would not address the need for a reliable space to process and store vehicles.

2.2 Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The preferred action under the Proposed Action alternative would consist of elevating the pavement of the existing Parcel B parking lot by approximately 3 feet. Increasing the pavement elevation from approximately 6 feet above mean sea level (MSL) to approximately 9 feet above MSL would minimize the potential for property damage. In comparison, the surrounding parcels did not experience flood damage during the hurricane events due their existing elevations above 6 feet. The project would cost approximately \$7 million. The approximate timeline to implement this alternative would require approximately a year to design and conduct environmental studies and approximately a year for construction.

This alternative would consist of the addition of clean fill dirt over the existing flood-prone 19.9-acre area and then paving the parking lot. The project's limits of construction would be contained within the footprint of the existing parking lot (e.g., within the existing chain link security fence surrounding Parcel B, which is set on top of and immediately behind the existing asphalt). Staging areas would occur within the existing parking lot and no additional right of way (ROW) acquisition would be required for the construction of this proposed action. A fabriform structure would be installed starting at the existing curb line. This structure consists of double layered fabric with concrete filling rising at a 2:1 slope to the proposed future elevation. This fabriform structure would protect the proposed infrastructure from wave actions associated with increased turbulent tidal waters.

Drainage would be consistent with the existing infrastructure under the Proposed Action alternative. The existing condition, conveys surface water from the adjoining parking lot at Parcel A, located on the southwest quadrant of Parcel B, and crosses to Parcel B as sheet flow to a shared outfall. Since the proposed action would raise Parcel B by 3 feet under the Proposed Action alternative, in order to retain consistency, a "V-gutter" drainage feature of no more than 10 feet wide and up to 2 feet deep would be constructed along the southwestern edge of Parcel B along the shared extent with Parcel A to carry the sheet flow from Parcel A to the current outfall shared by Parcels A and B (see Project Location Map in **Appendix A** which indicated the proposed V-Gutter with the existing/proposed outfall and **Appendix B, Item 5** for proposed plans found under the Preliminary Draft Concept Plans in the Interim Deliverable [10/26/21]). Therefore, with this design stormwater drainage would remain the same under the existing condition. The addition of the V-gutter does not impact the drainage of Parcel B.²

A project-specific Erosion and Sediment Control Plan (ESCP) would be prepared including the stormwater best management practices (BMPs) to be implemented to maintain water quality and to minimize runoff volume discharged off site. This proposed project is located within the floodplain (see **Section 3.1.3, Floodplain Management**) because the use and benefit of the parking lot is functionally dependent upon being located near water as it is part of port operations at the CIT

² Variables used to calculate runoff do not change from the pre-developed to the post-developed condition. Intensity is the same based on rainfall data, and land cover will be impervious pavement in both the pre and post developed condition. The footprint will be constant and the time of concentration will remain the same as the existing sloped are being maintained.

within the Port of Brunswick (see **Appendix B**, Floodplain Analysis Study and Hydraulics and Hydrology Analysis Study for more details).

The benefit-cost analysis (BCA) (FEMA BCA V6.0) demonstrates a 25-year useful life and is confirmed to have a benefit cost ratio of 12.5 (see **Appendix B**). Based on the BCA, this alternative is an acceptable use of funds and would create a potential reduction in the loss of property on Parcel B.

2.3 Alternatives Considered and Eliminated from Further Consideration

An analysis of Alternatives 3 and 4 was conducted. However, these alternatives were removed from consideration and no further discussion of these alternatives is included within the EA.

Alternative 3: Elevated Parking Deck. As described in GPA's grant application (**Appendix B**), this alternative would consist of constructing an elevated concrete structure that would allow for storage of vehicles above the existing average of 7 feet (NAVD88 State Plane Coordinates). Construction of this concrete deck would raise the vehicles to an elevation of 16 feet above sea level. This alternative would be cost prohibitive based on program criteria and result in inconsistency in infrastructure. In addition, implementation of this alternative would require approximately 3.5 years to design, bid, award, and construct. Lastly, since there is a viable, schedule appropriate, cost-effective alternative that meets the need and purpose, Alternative 2 is preferred over Alternative 3. Therefore, this alternative has been eliminated from further consideration in this EA.

Alternative 4: Alternate Site Located Outside the Floodplain. This alternative would consist of relocating the project site outside of the floodplain. Locating the proposed project outside of the floodplain is not a practicable alternative as Parcel B would not be able to perform its intended purpose of serving the auto industry accessibility to the Brunswick River. The port and associated operations are functionally dependent on being near a navigable waterway. Lastly, since there is a viable, location preferred, schedule sensitive, and cost-effective alternative that meets the need and purpose, Alternative 2 is preferred over Alternative 4. Therefore, this alternative has been eliminated from further consideration in this EA.

SECTION THREE: AFFECTED ENVIRONMENT AND CONSEQUENCES

Preliminary Screening of Assessment Categories

This section discusses environmental resources and details the assessments performed. The resources were evaluated via a preliminary desktop screening based on project area description and available information. Coastal Barrier Resources Act (CBRA) was not applicable as the project footprint is not located in a designated CBRA zone. In addition, the Migratory Birds Treaty Act (MBTA) section has no affect because there will be no vertical construction, bridge activities, and no potential of take to migratory bird species. Results from the preliminary desktop screening shown that CBRA and MBTA are to be eliminated from further review.

3.1 Physical Environment

3.1.1 Geology, Seismicity, and Soils

The existing elevation of the proposed project footprint is 7.0 feet (NAVD88 State Plane Coordinates). According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, the only soil located within the project footprint is Mandarin fine sand. Mandarin fine sand is well drained and is found in flats and marine terraces. The soils surrounding the project footprint are sands and tidal marshes: Mandarin Fine Sand, Pottsburg sand, Rutlege fine sand, Cainhoy fine sand, and Bohicket-Capers association (see **Appendix A**).³

There is no known seismic data and Executive Order (EO) 12699, Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction would not apply. No known earthquake risks or faults are present in this area.

The Farmland Protection Policy Act (P.L. 97-98, Sec. 1539-1549; 7 U.S.C. 4201, et seq.) was enacted in 1981 to minimize the unnecessary conversion of farmland to non-agricultural uses. Programs administered by federal agencies must be compatible with state and local farmland protection policies and programs. The NRCS is responsible for protecting significant agricultural lands from irreversible conversions that result in the loss of an essential food or environmental source. Prime farmland is characterized as land with the best physical and chemical characteristics for the production of food, feed, forage, fiber, and oilseed crops. This prime farmland is either used for food or fiber crops or is available for those crops, but is not urban, built-up land, or water areas. According to the NRCS, prime farmland is not located within the project footprint.⁴

³ <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>

⁴ This website serves as reference: <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx> . An area of interest (AOI) and a report can be produced for the project area using this website.

Alternative 1 – No Action

No direct impacts to soils would occur under the No Action alternative. The existing condition is paved and under the No Action alternative, the future condition would also be paved. The long-term indirect impacts of the No Action alternative could include the stormwater runoff inundating the soils adjacent to the parking lot in the marshland as under the existing condition. When the soils adjacent to the parking lot are inundated with flood water this could cause foundation problems to the parking lot with erosion and scouring. No other short-term or long-term impacts on geology, seismicity, or soils in the project footprint are anticipated under the No Action alternative as no construction would take place.

Alternative 2 –Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action would have minor, short-term construction related impacts on soils from earth-disturbing activities such as the input of fill on the project footprint. Existing concrete would be crushed in place down to gravel size pieces and serve as the sub-grade which repurposes the concrete and serves as the aggregate base to the new asphalt. The fill soils used would come from a Georgia Department of Transportation approved source. Excavation of soils of up to 2 ft would be required for the V-gutter and the anchor trench of the fabriform (see **Appendix B** Concept Plans). Due to previous construction activities, some soils under the parking lot are already disturbed, as the original removal of vegetation required clearing and grubbing, including removal of roots for species such as saw palmetto which can extend to 1 foot.⁵ All removed material would be disposed of off-site outside the floodplain at a county approved disposal site. During construction a project specific ESCP would be prepared and would include erosion and sedimentation BMPs to reduce potential for impacted soils to erode and be transported off site. The ESCP would include additional BMPs to prevent erosion and improve water quality by filtering sediment and may include but are not limited to a silt fence, erosion control matting for open-graded or disturbed slopes, sediment tubes in or around stormwater inlets or flumes, etc.

In the long term, the Proposed Action would have negligible impacts on geology, soils, and seismicity. Currently no soils are exposed under the parking lot or under the build condition, and no soils are be exposed. The construction of the elevated parking lot would resemble the current parking lot conditions.

3.1.2 Water Resources and Water Quality

Water resources include surface water, groundwater, stormwater, and drinking water (wetlands are discussed in **Section 3.2.2**). The Clean Water Act (CWA; 33 U.S.C. § 1251 et seq.) establishes the basic guidelines of discharging pollutants (including fill material) into waters of the United States. The CWA is under the jurisdiction of the United States Army Corps of Engineers (USACE) and the US Environmental Protection Agency (EPA) regulates water quality.

⁵ https://maps1.vcgov.org/VC_Parks/Lyonia_StoryMap/Images/UW11000.pdf

Section 404 of the CWA establishes the USACE permit requirements for discharging, dredging, or filling Waters of the United States (WOTUS) and traditional navigable waterways. USACE regulation of activities within navigable waters is also authorized under the 1899 Rivers and Harbors Act. Under the National Pollutant Discharge Elimination System (NPDES) program (Section 402 of the CWA), EPA regulates both point and nonpoint pollutant sources, including stormwater and stormwater runoff. In Georgia, the USACE Savannah District has jurisdiction over Section 404-regulated WOTUS. The project site is located within the 0307020302 Hydrologic Unit Code (HUC) 10 referred to as the Brunswick River-Atlantic Ocean watershed.

Based on desktop screening of current aerials of the project area and the subsequent confirmation during a July 2020 site visit, no surface waters were identified within the proposed project footprint (see Interim Deliverable- 10/26/2021 Attachments 7 and 8: Color Photos of the Project Area in **Appendix B** for pictures from the site visit). The nearest body of water is the Brunswick River. Marshland feeding into the river is approximately 88 feet to the east of Parcel B (see **Appendix A** Project Location Map, Regional Map, National Wetlands Inventory Map, and CZMA Map). The Brunswick River is a Section 303(d) listed body of water and considered an impaired waterway by the EPA. It is impaired by non-point source pollution and urban runoff/storm sewers. From the existing project site, two-thirds of the stormwater runoff from the project site flows to the south and one-third of the runoff flows to the north.

Glynn County and coastal Georgia are located within the Floridian aquifer system. It is one of the most productive aquifers in the world and stretches 100,000 square miles underneath Georgia, Alabama, Florida, and South Carolina. This aquifer provides water for the City of Brunswick and other communities in the area.

Alternative 1 – No Action

There would be no short-term impacts on water resources or water quality in the project footprint under the No Action alternative as no construction would occur. The long-term condition would result in continued stormwater runoff sheet flow carrying potential pollutants due to vehicle contaminants that could affect water quality of the adjacent marshes and Brunswick River. However, during flood events additional inundation would continue to occur as in the existing condition carrying potential pollutants off-site.

Alternative 2 - Elevate Parcel B within the Existing Footprint (Proposed Action)

Under the Proposed Action alternative, drainage would not change from the existing conditions, as noted above under **Section 2.2**. To follow existing drainage patterns, a “V-gutter” no more than 10 feet wide and up to 2 feet deep would be constructed along the southwestern edge of Parcel B at the toe of the slope (approximately 812 feet) to convey stormwater surface runoff to the perimeter of the parking lot to existing drainage features. The incorporation of a V-gutter is required to maintain and offset the proposed changes in elevation on Parcel B to avoid impacting the drainage patterns of Parcel A and allowing the collection of runoff to flow and be conveyed off site. The inclusion of the V-gutter would ensure no indirect effects of the proposed project on the drainage patterns for stormwater runoff for Parcel A.

Under this alternative, stormwater runoff from the Parcel B parking lot would continue to discharge upstream of and flow into the Brunswick River. However, during flood events additional inundation carrying potential pollutants off-site would be less frequent than would occur under the existing condition due to the increase in elevation.

During construction a project specific ESCP would be prepared. In the areas where concrete is to be removed, temporary sediment basins would be placed within the limit of disturbance of the parking lot to collect sediment from exposed surfaces during construction activities (see Appendix A for a drawing of the sediment basins on the plan sheets D101 and D102). Additional BMPs to prevent erosion and improve water quality by filtering sediment may be included in the final design and may include but are not limited to a silt fence, erosion control matting for open-graded or disturbed slopes, and/or sediment tubes in or around stormwater inlets or flumes. Based on implementation of during construction BMPs, there would be no anticipated adverse short-term effects to the water resources or water quality in the area.

In compliance with Section 402 of the CWA, the proposed action would require a NPDES stormwater permit for maintaining water quality, issued by the Environmental Protection Division (EPD) of Georgia's Department of Natural Resources. A CWA Section 404 permit is not required for this project (see Appendix B).

The long-term effects of the Proposed Action alternative to the adjoining marshes and Brunswick River would be negligible as runoff discharge would be treated through use of permanent sediment basins around the perimeter of the parking lot to collect sediment and pollution from the parking lot as well as slowing down water velocities into adjacent surface waters. Based on the impervious surface of the parking lot, it is not anticipated groundwater will infiltrate within the project footprint.

3.1.3 Floodplain Management (Executive Order 11988)

The EO 11988, Floodplain Management, requires federal agencies to take action to minimize occupancy and modification of the floodplain. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 CFR § 9. FEMA applies the Eight-Step Decision-Making Process to ensure that it funds projects consistent with EO 11988.

This project is located within the 100-year floodplain (Zone AE 11 and AE 10) as indicated in the Flood Insurance Rate Map (FIRM), panel #13127C0218H for Glynn County, Georgia (see **Appendix A** for FIRMette Map) with the effective date of January 5, 2018. Zone AE indicates areas that have at least a 1%-annual-chance of being flooded, but where wave heights are less than 3 feet. The project footprint is also within the Limit of Moderate Wave Action (LiMWA).

Alternative 1 – No Action

Under the No Action alternative, there would be no impacts to the floodplain as current conditions would not change. However, the risk of flooding and associated property damages would continue at Parcel B.

Alternative 2– Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative would raise the parcel approximately 3 feet. The increase in elevation would result in a decreased probability of property losses due to flooding, a minimization of adverse effects to property, and a decrease in flood zone elevations from AE 11 and AE 10 to AE 10 and AE 9. There would be no downstream effects of the project on floodplains. Implementation of the Proposed Action alternative would not cause flooding in the surrounding areas and would not adversely alter the floodplain. Floodplain models demonstrated that in comparison to the existing and proposed construction, there would be no downstream negative effects of the project on Base Flood Elevations (BFE). The BFEs in the downstream and offshore areas are projected to stay the same under the Proposed Action alternative (see Appendix B, Attachment 1a. Floodplain Analysis Study).

In addition to the changes to the floodplain elevations, it is anticipated the LiMWA line would be adjusted to reflect the decreased wave height elevations. These changes would require a Letter of Map Revision- Based on Fill (LOMR-F) to be coordinated with Glynn County. The Proposed Action alternative avoids new direct and indirect development in the floodplain and reduces the risk of flood damages and loss. There would be no increase in flood potential. The Proposed Action alternative is compliant with the National Flood Insurance Program (NFIP) and would not increase the risk of flood loss.

The Proposed Action alternative would create a beneficial impact to human safety, welfare, and property by reducing the frequency of inundation under future flood events. This alternative would avoid new direct and indirect development of the floodplain and reduces the risk of flood loss. In the long-term, with the increased elevation and removal of the parking lot from the frequency of flooding, there would be less potential for human safety issues in relocating the vehicles under inclement weather conditions. The Proposed Action alternative would minimize the impact of floods on human health, safety, and welfare. Although the Proposed Action alternative would occupy the floodplain, the economic and social value benefits would outweigh the need to occupy the floodplain.

3.1.4 Air Quality

The Clean Air Act (CAA) requires the EPA to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment; the CAA established two types of national air quality standards; primary standards set limits to protect public health, including the health of “sensitive” populations such as asthmatics, children, and the elderly; secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to

animals, crops, vegetation and buildings; current criteria pollutants are: carbon dioxide (CO), nitrogen dioxide (NO₂), ozone (O₃), lead (Pb), particulate matter (PM₁₀), and sulfur dioxide (SO₂).

According to the EPA's NAAQS Nonattainment areas for Georgia⁶, the project footprint is in Glynn County which is *not* listed in the Nonattainment areas; therefore, it is considered to be in the attainment area for all criteria pollutants.

Alternative 1 – No Action

No construction activities would occur under the No Action alternative. Therefore, no short- or long-term impacts on air quality are anticipated in the project footprint because there would be no change in existing emissions levels or patterns.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative may result in temporary impact to air quality due to the construction equipment utilized for the project. Impacts may result from the operation of diesel and gasoline engines associated with excavation and other equipment during the construction phase. Construction equipment engine idling would be minimized and would be properly maintained on a regular basis. Construction would not occur before 7am and not after 6pm.

During the construction phase, exposed soil could temporarily increase airborne dust and debris into the project footprint. Dust and debris can damage tenant inventory in the adjacent areas. Therefore, standard dust control measures (e.g., wetting the soil before manipulation, etc.) would be required in the ESCP and would be implemented by the contractor. The Proposed Action alternative would not create any long-term air quality issues. No adverse impacts to air quality would be anticipated and an air permit is not required. Open construction areas would be minimized and watered as needed to minimize particulates.

3.1.5 Coastal Zone Management

The purpose of the Coastal Zone Management Act (CZMA) is to protect the coastal environment from growing demands associated with residential, recreational, commercial, and industrial uses. The CZMA provisions help States develop coastal management programs to govern and balance competing uses of the coastal zone. Federal Agencies, including FEMA, must follow the Federal Consistency provisions as delineated in 15 CFR § 930.

The CZMA requires that federal agency actions with reasonably foreseeable effects on any land, water, or natural resource of the coastal zone be consistent, to the maximum extent practicable, with the enforceable policies of a coastal state or territory's federally approved Coastal Management Plan. FEMA is required to evaluate each relevant Coastal Management Plan and provide a consistency determination. Glynn County is included in Georgia's six coastal counties and is therefore included in the Georgia coastal zone under CZMA.

⁶ <https://www3.epa.gov/airquality/greenbook/ancl.html>

The Georgia Coastal Management Act authorized the creation of the Georgia Coastal Management Program. The Georgia Coastal Management Program was approved by National Oceanic and Atmospheric Administration (NOAA) in 1998, with Georgia's Department of Natural Resources (GADNR), Coastal Resources Division, serving as the lead agency.

As part of the Georgia Coastal Management Program the Coastal Marshlands Protection Act (CMPA) regulates activities and water dependent structures in jurisdictional marshlands in Georgia. The required marsh buffer is 25 feet. The National Wetlands Inventory (NWI) data shows the project footprint is located approximately 88 feet away from the nearest marshland (e.g., Regular Flood Marsh) consisting of salt and brackish marsh (see **Appendix A**, National Wetlands Inventory Map). The proposed action would occur outside the designated marsh buffer and no marsh buffer encroachment would occur.

Alternative 1 – No Action

No construction activities would occur and there would be no direct impact to the surrounding coastal zone marshlands under the No Action alternative.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

Construction activities under the Proposed Action alternative would occur outside the marsh boundary and no direct impacts to the marsh would occur. As the project is located approximately 88 feet away from the nearest marshland consisting of salt and brackish waters, there would be no impacts to the coastal zone marshland or its buffer under this alternative. The Proposed Action alternative would have no effect on the nearby marshes.

3.2 Biological Environment

3.2.1 Terrestrial and Aquatic Environment

The proposed 19.9-acre project footprint is currently used as a parking lot. The site visit on July 13, 2020, indicated the existing condition is paved with limited value or potential habitat for plant and wildlife species.

Alternative 1 – No Action

Under the No Action alternative, no construction would occur and there would be no anticipated impacts on terrestrial or aquatic environments.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

Under the Proposed Action alternative, the project would stay within the existing footprint of the parking lot. There would be no direct impacts to terrestrial and aquatic environments by the Proposed Action alternative. For indirect effects during construction, a project-specific ESCP would be prepared and would include BMPs to be implemented to prevent erosion and siltation and address water quality considerations for species that occupy the marsh and Brunswick River.

3.2.2 Wetlands (Executive Order [EO] 11990)

The EO 11990, Protection of Wetlands, requires federal agencies to take action to minimize the loss of wetlands. The NEPA compliance process requires federal agencies to consider direct and indirect impacts to wetlands, which may result from federally funded actions.

Alternative 1 – No Action

Under the No Action alternative, there would be no impacts to wetlands as current conditions would not change and no construction would occur. Compliance with EO 11990 has been met.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The nearest marshland is located approximately 88 feet from the project area. The project would stay within the existing parking lot footprint and maintain current stormwater drainage patterns. Per **Section 2.2** above, as a result of the Proposed Action alternative, no changes in volume or flows of stormwater runoff are anticipated and no direct impacts to wetlands or marshes would occur. No change in indirect or long-term effects from the Proposed Action alternative would occur.

Under the Proposed Action alternative, the FEMA Eight-Step Planning Process was completed because the proposed project area is located within a 100 year (1% chance) floodplain and (Appendix C) is required per 44 CFR § 9. A CWA Section 404 permit is not anticipated to be required for this project. As discussed in **Section 3.1.2** above, in compliance with Section 402 of the CWA, a NPDES permit would likely be required. Therefore, compliance with EO 11990 would be met under the Proposed Action alternative.

3.2.3 Threatened and Endangered Species

The Endangered Species Act (ESA) requires any federal agency that funds, authorizes or carries out an action to ensure that their action is not likely to jeopardize the continued existence of any endangered or threatened species (including plants) or result in the destruction or adverse modification of designated critical habitats.

In accordance with Section 7 of the ESA, the project was evaluated for the potential impacts to federally listed threatened and endangered species and any federally designated critical habitat. The project site is industrial and is highly developed. The project footprint consists of an existing parking lot. A site visit was conducted in July 2020. No suitable habitat for protected species was identified within the proposed project footprint (see Interim Deliverable- 10/26/2021 Attachments 7 and 8: Color Photos of the Project Area in **Appendix B** for pictures from the site visit).

A list of species that may have the potential to occur within the vicinity of the project area is presented in **Table 2** below. For the purposes of the analysis below, the project area considers the project footprint and a surrounding 500-foot buffer. The species list in **Table 2** below is comprised from information provided in the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) system, a list of Threatened and Endangered Species and Critical Habitats Under NOAA Fisheries Jurisdiction, and Georgia's Natural, Archaeological, and Historic Resources

Geographic Information Systems (GNAHRGIS) data (see **Appendix B**). **Table 2** summarizes the presence of federally designated critical habitat in the project area, provides effect determinations for each Alternatives 1 and 2, and is followed by a detailed description for each species with the potential to occur in the vicinity of the project area.

Table 2: Federally Listed Species with the Potential to Occur in the Vicinity of the Project Area

Scientific Name	Common Name	Federal Status	Critical Habitat in the Project Area?	Alt 1 - No Action	Alt 2 - Proposed Action
Birds					
<i>Laterallus jamaicensis</i> ssp. <i>Jamaicensis</i>	Eastern black rail	Threatened	No	No Effect	No Effect
<i>Mycteria americana</i>	Wood stork	Threatened	No	No Effect	No Effect
Reptiles					
<i>Caretta caretta</i>	Loggerhead sea turtle	Threatened	No	No Effect	No Effect
<i>Chelonia mydas</i>	Green sea turtle	Threatened	No	No Effect	No Effect
<i>Dermochelys coriacea</i>	Leatherback sea turtle	Endangered	No	No Effect	No Effect
<i>Drymarchon corais couperi</i>	Eastern indigo snake	Threatened	No	No Effect	No Effect
<i>Eretmochelys imbricata</i>	Hawksbill sea turtle	Endangered	No	No Effect	No Effect
<i>Gopherus polyphemus</i>	Gopher tortoise	Candidate	No	No Effect	No Effect
<i>Lepidochelys kempii</i>	Kemp's Ridley sea turtle	Endangered	No	No Effect	No Effect
Fish					
<i>Acipenser brevirostrum</i>	Shortnose sturgeon	Endangered	No	No Effect	No Effect
<i>Acipenser oxyrinchus oxyrinchus</i>	Atlantic sturgeon	Endangered	No	No Effect	No Effect
<i>Carcharhinus longimanus</i>	Oceanic whitetip shark	Threatened	No	No Effect	No Effect
<i>Manta birostris</i>	Giant manta ray	Threatened	No	No Effect	No Effect
Mammals					
<i>Balaenoptera musculus</i>	Blue whale	Endangered	No	No Effect	No Effect
<i>Balaenoptera physalus</i>	Fin whale	Endangered	No	No Effect	No Effect
<i>Eubalaena glacialis</i>	North Atlantic right whale	Endangered	No	No Effect	No Effect
<i>Physeter macrocephalus</i>	Sperm whale	Endangered	No	No Effect	No Effect
<i>Trichechus manatus</i>	West Indian manatee	Threatened	No	No Effect	No Effect

Alternative 1 – No Action

Under the No Action alternative, no construction would occur. No impacts to threatened and endangered species are anticipated.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

Detailed below, the potential impacts resulting from Alternative 2 are considered for each species listed above in **Table 2** and an effect determination for the species and designated critical habitat, if any, is provided. There would be no potential effect on critical habitat and water quality because of the implementation of during construction BMPs to prevent erosion and address water quality by filtering sediment and, may include but not limited, to a silt fence, erosion control matting for open-graded or disturbed slopes, sediment tubes in or around stormwater inlets or flumes, etc.

Birds

Eastern black rail (*Laterallus jamaicensis ssp. Jamaicensis*): The Eastern black rail is federally listed as threatened. The primary threats to the eastern black rail are habitat loss and destruction, incompatible land management, sea-level rise and tidal flooding, and increasing storm intensity and frequency. This species resides in a tidally or non-tidally influenced marsh that ranges from salt to brackish to fresh water. On the Georgia coast, habitat is the higher elevations of estuarine persistent emergent wetlands dominated by saltmarsh cordgrass (*Spartina alterniflora*) and needlerush (*Juncus roemerianus*). Although potential habitat may occur in the nearby marsh wetland area, under the Proposed Action alternative there would not be any impact to nearby wetlands. Since all project activities would remain within the existing footprint and wetlands would not be impacted, it is anticipated that the Proposed Action would result in “No Effect” the eastern black rail. Critical habitat has not been designated for the eastern black rail.

Wood stork (*Mycteria americana*): The wood stork is federally listed as threatened due to habitat destruction. Wood storks are primarily associated with freshwater and estuarine habitats that are used for nesting, roosting, and foraging. Wood storks typically construct their nests in medium to tall trees that occur in stands located either in swamps or on islands surrounded by relatively broad expanses of open water. Successful colonies are those that have limited human disturbance and low exposure to land-based predators. Although wood storks are a wide-ranging species, no known colony sites are located within 0.5 mile of the project footprint. Typical foraging sites for the wood stork include freshwater marshes and stock ponds, shallow, seasonally flooded roadside and agriculture ditches, narrow tidal creeks and shallow tidal pools, managed impoundments, and depressions in cypress heads and swamp sloughs. Because the Proposed Action would not impact nearby wetlands and all project activities would remain within the existing parking lot footprint, it is anticipated the Proposed Action would have “No Effect” on the wood stork. Critical habitat has not been designated for the wood stork.

Reptiles

Loggerhead sea turtle (*Caretta caretta*) and green sea turtle (*Chelonia mydas*): These sea turtle species are listed as threatened due to commercial fishing, habitat loss and degradation, harvest of

eggs, disease, and pollution. These sea turtle species reside in subtropical and temperate waters inside reefs, bays, and inlets and come ashore sandy beaches to build nests. Because there is no suitable habitat or beaches located within the project footprint and the construction activities would remain within the existing parking lot footprint, it is anticipated the Proposed Action would have “No Effect” on the loggerhead sea turtle and the green sea turtle. Designed critical habitat for these species is located outside of the project area and therefore the Proposed Action would not result in its destruction or adverse modification.

Hawksbill sea turtle (*Eretmochelys imbricata*), Kemp’s ridley sea turtle (*Lepidochelys kempii*), and leatherback sea turtle (*Dermochelys coriacea*): These sea turtle species are federally listed as endangered due to commercial fishing, harvest of eggs, habitat loss and degradation, vessel strikes, and pollution. These sea turtle species reside in nearshore foraging grounds, especially healthy coral reef habitat and nests on beaches. Because there is no suitable habitat or beaches located within the parking lot footprint and the construction activities would remain within the existing footprint, it is anticipated that the Proposed Action would have “No Effect” on the hawksbill sea turtle, Kemp’s ridley sea turtle, and the leatherback sea turtle. Critical habitat has not been designated for the Kemp’s ridley sea turtle. The designed critical habitat for the hawksbill and leatherback sea turtles is located outside of the project footprint and therefore the Proposed Action would not result in its destruction or adverse modification.

Eastern indigo snake (*Drymarchon corais couperi*): The eastern indigo snake is federally listed as threatened due to habitat destruction, fragmentation, and degradation. The eastern indigo snake is one of the largest non-venomous snakes in North America, with individuals often reaching up to 8 feet in length. Although this species prefers uplands, individuals also utilize some wetlands and agricultural areas and often move seasonally between upland and lowland habitats, particularly in Georgia which is in the northern portions of its range. GNAHRGIS recorded a known occurrence of this species 1.5 miles northeast of the project footprint (August 13, 2021). Therefore, as a mitigation measure, the selected contractor would implement the most current version of USFWS’ *Standard Protection Measures for The Eastern Indigo Snake*⁷ (currently dated August 12, 2013). Because the project footprint is comprised of industrial lands and project activities would remain within the existing parking lot footprint, it is anticipated that the Proposed Action would have “No Effect” on the eastern indigo snake. Critical habitat has not been designated for the eastern indigo snake.

Gopher tortoise (*Gopherus polyphemus*): The gopher tortoise is federally listed as a Candidate specie due to habitat destruction and fragmentation. The species resides in dry upland habitats with well-drained sandy soils for digging burrows, with food plants, and open sunny areas for nesting and basking. Because the project footprint is industrial and does not contain suitable burrowing or foraging habitats, it is anticipated that the Proposed Action would have “No Effect” on the gopher tortoise. Critical habitat has not been designated for the gopher tortoise.

⁷https://www.fws.gov/athens/endangered/herps/STANDARD_PROTECTION_MEASURES_FOR_THE_EASTERN_INDIGO_SNAKE_FL_GA.pdf

Fish

Shortnose sturgeon (*Acipenser brevirostrum*): The shortnose sturgeon is federally listed as endangered due to pollution and overfishing. The shortnose sturgeon is born in freshwater and they live in their birth river with short feeding or migratory trips into salt water. Because the project footprint is located in an industrial parking lot and project activities would remain within the existing footprint, it is anticipated that the Proposed Action would have “No Effect” on the shortnose sturgeon. Critical habitat has not been designated for the shortnose sturgeon.

Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*): The Atlantic sturgeon is federally listed as endangered due to pollution, overfishing, and habitat degradation. The Atlantic sturgeon is born in freshwater, migrates to the sea, and back again to freshwater to spawn. Because the project footprint is located in an industrial area and project activities would remain within the current footprint resulting in no impacts to nearby wetlands, it is anticipated that the Proposed Action would have “No Effect” on the Atlantic sturgeon. The designated critical habitat for the Atlantic sturgeon is located outside of the parking lot footprint therefore the Proposed Action would not result in its destruction or adverse modification.

Oceanic whitetip shark (*Carcharhinus longimanus*): The oceanic whitetip shark is federally listed as threatened due to commercial fishing and harvesting for international trade. The oceanic whitetip shark is found offshore in the open ocean, on the outer continental shelf, or around oceanic islands in deep water areas. Because there would be no in-water work and project activities would remain within the current footprint without any impacts to water quality or nearby wetlands, the project is anticipated to have “No Effect” on the oceanic whitetip shark. Critical habitat has not been designated for the oceanic whitetip shark.

Giant manta ray (*Manta birostris*): The giant manta ray is federally listed as threatened due to overfishing and harvest for international trade. This species resides in tropical, subtropical, and temperate bodies of water along with estuarine waters, oceanic inlets, and bays and intercoastal waterways. Because no in-water work would occur and the Proposed Action would not result in any impacts to water quality or nearby wetlands, it is anticipated that the Proposed Action would have “No Effect” on the giant manta ray. Critical habitat has not been designated for the giant manta ray.

Mammals

Blue whale (*Balaenoptera musculus*), fin whale (*Balaenoptera physalus*), North Atlantic right whale (*Eubalaena glacialis*), and sperm whale (*Physeter macrocephalus*): The blue whale, fin whale, and sperm whale are federally listed as endangered, and the North Atlantic right whale is federally listed as threatened. In addition to the protections afforded under the ESA, each of these species are also protected under the Marine Mammal Protection Act. Like all large whales, these species were hunted by commercial whalers, which severely lowered their populations. Currently, the major threat to these species comes from vessel strikes, entanglement in fishing gear, pollution, and ocean noise. These whales seem to generally migrate north and south depending on the

seasons, moving toward the poles in the summer. They are typically found in deep, offshore waters, traveling in open seas, away from the coast. Due to the relatively minor nature of the work, lack of suitable habitat within the project footprint, and because the Proposed Action would not result in any impacts to water quality or nearby wetlands, it is anticipated that the Proposed Action would have “No Effect” on the blue whale, fin whale, North Atlantic right whale, and the sperm whale. There is currently no critical habitat designation for the blue whale, fin whale, or the sperm whale. The designed critical habitat for the North Atlantic right whale is located outside of the parking lot footprint therefore the Proposed Action would not result in its destruction or adverse modification.

West Indian manatee (*Trichechus manatus*): The West Indian manatee is listed as threatened due to a variety of human activities (hunting, habitat loss, collisions with watercraft, pollution and poor water quality, etc.). The manatee is an herbivorous marine mammal typically found in marine, estuarine, and freshwater environments. GNAHRGIS recorded a known occurrence of this species 0.2-mile northeast of the project footprint (August 13, 2021). There would be no potential effect on the critical habitat and water quality because of BMPs. Its range is generally limited to the tropics and sub-tropics regions of the southeastern U.S. It requires warm water in the winter months and a source of cold water in the summer months. Because of their inability to move quickly, manatees are susceptible to collisions with fast boats or barges moving through shallow water. Because no in-water work would occur and the Proposed Action would not result in any impacts to water quality or nearby wetlands, it is anticipated that the Proposed Action would have “No Effect” on the West Indian manatee. The designed critical habitat for the West Indian manatee is located outside of the project footprint therefore the Proposed Action would not result in its destruction or adverse modification.

3.3 Hazardous Materials

Hazardous materials are those substances identified by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act, and the Toxic Substances Control Act (TCSA). The Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) and Hazardous and Solid Waste Act, defines hazardous wastes as substances that, because of their quantity, concentration, physical, chemical, or infectious characteristics, may present substantial danger to public health or the environment when released or otherwise improperly managed.

To determine and identify known and documented federally regulated hazardous material sites within or adjacent to the project footprint, the following resources were used; EPA NEPAassist⁸ web portal, the EPA EnviroFacts⁹ Website, and Georgia’s EPD. NEPAassist identified 9 regulated sites within a 0.5-mile radius of the proposed project location as summarized in **Table 3** below. Three sites are regulated under RCRA, five are regulated under the Integrated Compliance Information System (ICIS-Air) which is compliance and permit data for stationary sources of air pollution, and one is regulated under the ICIS-NPDES which is an information management system to track permit

⁸ <https://www.epa.gov/nepa/nepassist>

⁹ <https://enviro.epa.gov/>

compliance with NPDES under the CWA. None of these regulated sites occur within the project limits and the closest point is 0.2 mile southwest (See **Table 3** below).

A desktop survey and site visit discovered no gas stations and above ground storage tanks located within the proposed project footprint. However, contaminated materials in the floodplain could be disturbed during a flood event if facilities containing hazardous materials are damaged or if the ground is eroded exposing unidentified sites.

Table 3: Hazardous Material Sites

Site No.	Site Name	Contact Address	Applicable Law/Regulation
1	AMPORTS	30 Joe Frank Harris Blvd. Brunswick, GA 31525	Hazardous Waste (RCRA)
2	International Auto Processing, Inc.	1 Joe Frank Harris Blvd. Brunswick, GA 31520	RCRA
3	BMW of North America LLC.	106 Joe Frank Harris Blvd. Brunswick, GA 31520	RCRA
4	BMW of North America LLC.	106 Joe Frank Harris Blvd. Brunswick, GA 31520	Air Pollution (ICIS-AIR)
5	Georgia Ports Authority	157 Penniman Circle Brunswick, GA 31523	ICIS-AIR
6	Amports, Inc.	30 Joe Frank Harris Blvd. Brunswick, GA 31523	ICIS-AIR
7	International Auto Processing, Inc.	1 Joe Frank Harris Blvd. Brunswick, GA 31523	ICIS-AIR
8	Southside Access Road Improvements	Georgia Ports Authority, CIT	ICIS-AIR
9	Morgan Corporation Brunswick Pugmill	173 Penniman Circle Brunswick, GA 31523	ICIS-NPDES

Alternative 1 – No Action

No construction would occur under the No Action alternative in the project footprint; therefore, there would be no impacts related to hazardous materials either from the use of construction equipment or from the exposure of contaminated resources through ground-disturbing activities. The nearest hazardous waste source is located outside of the proposed project footprint.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action would involve the use of construction equipment within the project footprint and there is a potential for minor, short-term impacts from leaks of oils, fuels, and lubricants. To

reduce any potential negative effects, construction equipment will undergo regular maintenance and remain idle while not in use.

There is also a potential of exposure of unknown contaminated materials as a result of excavation and removal of soil and construction debris. However, prior to the construction of the parking lot on Parcel B, the land was previously undeveloped. No long-term impacts from hazardous materials are anticipated in the proposed project footprint. The Proposed Action would not add any hazardous facilities, operations, or chemicals and any hazardous materials found would be managed and disposed of in accordance with the Georgia EPD USTMP (Underground Storage Tanks Management Program) and/or the HSRA (Hazardous Site Response Act) regulations.

3.4 Socioeconomics

3.4.1 Zoning and Land Use

In 1962, GPA purchased Colonel's Island and retains ownership. The proposed project is located in unincorporated Glynn County and zoned as basic industrial (see **Appendix A**). The *City of Brunswick Comprehensive Plan Update (2018)*¹⁰ highlights the important role ports play in Georgia's economy. Ports like Colonel's Island provide an advantage for manufacturing and distribution throughout the region.

Alternative 1 – No Action

Zoning and land use would not be changed under the No Action alternative.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The proposed project would be consistent with the industrial land use as currently assigned. It is anticipated that a NPDES permit and land disturbance permit from Glynn County will be needed for this project. No impacts to zoning and land use of the area would occur under the Proposed Action alternative (see **Section 3.4.5 Traffic and Circulation** below for more details on the reduction in parking spaces).

3.4.2 Visual Resources

The visual landscape is exclusively industrial and consists of a paved parking lot and manufacture buildings. Under the existing condition, the natural visual landscape is fragmented with CIT facilities such as roads, driveways, parking lots with chain link fencing and low-country marshes. To the north, south, and west are ships transporting materials in the Brunswick River. The landscape is in constant movement with CIT port operations including transporting cars on and off ships, washing cars, and relocating/maintaining cars in the parking lot. Views of the area are largely limited to employees work at Colonel's Island.

¹⁰ <https://www.brunswickga.org/planning/page/2018-comprehensive-plan>

Alternative 1 – No Action

Under the No Action alternative, no construction would occur. There would be no visual impacts to the project footprint under the No Action alternative.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative would raise the current parking lot grade by 3 feet. While this elevation would be noticeable on adjacent parcels, there would be a long term minor visual impact under the Proposed Action alternative because the existing chain link fence will remain in place and the landscape will stay consistent with the designated industrial usage. In addition, there are no visual receivers for this minor elevation change. For these reasons, the long-term change in visual impacts to the property would be insignificant. Short term visual impacts will be construction equipment staged in the parking lot during improvements.

3.4.3 Noise

The Noise Control Act (NCA) provides federal regulation of noise, which is defined as undesirable sound. The NCA gives the EPA authority to establish guidelines for acceptable ambient noise levels. Under EPA guidelines, outdoor sound levels in excess of 55 decibels (dB) are considered "normally unacceptable" for noise-sensitive land uses such as residences, schools, and hospitals.

The proposed project footprint is located in a working port designated as an industrial area. There are no noise-sensitive receptors in the proposed project footprint and there are no noise-sensitive land uses surrounding the project footprint.

Alternative 1 – No Action

Under the No Action alternative, no construction would occur. As a result, there would be no changes to ambient noise levels in the area under this alternative. There would be no long-term changes to noise due to operations at the facility as the existing use would continue.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative would cause short-term, temporary changes in the ambient noise levels in the area associated with the construction activities. Standard construction noise is anticipated which averages between 80-90 decibels. The demolition of concrete pavement is anticipated to be the loudest construction action and uses a machine with a hydraulic breaker arm. This type of appliance can create sound levels of 110-120 decibels¹¹. Other equipment to be used for construction include an excavation, backhoe, and a wheel/front end loader. No long-term changes to ambient noise levels are anticipated as the existing use of the parking lot would continue. To mitigate short term effects of noise control, construction will be limited to the hours of 7am to 6pm.

3.4.4 Public Services and Utilities

There are no public services (i.e., police, fire, rescue, and nearby schools) located within a 1-mile radius of the project footprint.

There are five power poles , a carport, and electrical charging station on parcel B. No additional utilities are withing the proposed project location.

Alternative 1 – No Action

Under the No Action alternative, no construction would occur. There would be no impacts to the public services or utilities.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative would require realignment of the power poles. The exact location of the poles has not yet been determined at this time and would be included as engineering plans are finalized for the project.

The carport and electrical charging station would be shifted to the northeast under this alternative. No other changes to utilities are proposed in and around Parcel B.

3.4.5 Traffic and Circulation

The project is located on lands zoned for industrial use. There are no public access roads or public transportation along the project footprint. The parcel is bounded by Joe Frank Harris Blvd. to the north which is an arterial two-lane roadway designed for heavy industrial vehicles. The roadway is maintained by GPA and located within the GPA property. As shown on the Regional Map (**Appendix A**), US 17/SR 520/Jekyll Island Causeway/Corridor Z, a two-lane undivided highway is located approximately 1 mile to the west of the project site.

Alternative 1 – No Action

Under the No Action alternative, no construction would occur and there would be no impact on the roadway traffic in the project footprint.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative may result in short term minor traffic inconveniences due to increased vehicle activity during construction, but would not impact traffic in the long-term. It is anticipated that the construction vehicles will access the project site via Joe Frank Harris Blvd. There will be no road closures or detours during construction and traffic mitigation measures will not be required. The project will have no long-term or short-term impacts to roadway traffic in the area.

The Proposed Action alternative will have a reduction in the number of parking spaces available and the usable surface area would be condensed to approximately 570 parking spots (14 percent less of current parking spots). To mitigate the loss of space, the tenant has created a plan and once construction is complete Parcel B will be heavily utilized (see also **Section 3.4.1**). The lot will be used as immediate arrival storage while the newly imported vehicles are set for processing. The project will increase revenue by providing quicker processing time and a reduction of inventory loss due to flood damage. While there would be a decrease to the number of parking spaces usable under the Proposed Action alternative, the need and purpose would be met.

3.4.6 Environmental Justice (Executive Order 12898)

On February 11, 1994, President Clinton signed EO 12898, Federal Actions to Address Environmental Justice (EJ) in Minority Populations and Low-Income Populations. The EO directs federal agencies, “to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high, and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States...”

In compliance with FEMA’s policy implementing EO 12898, Environmental Justice, the socioeconomic conditions and potential effects related to the alternatives have been reviewed. A desktop screening of the corridor was completed using 2010 US Census data and 2015-2019 American Community Survey (ACS) data to quantify minority and low-income populations and the percentage of non-English speaking persons in the project area.

The proposed project footprint is located within a single block group (Census Tract 10, Block group 1). As shown below in **Table 4**, the minority, low-income, and Low-English Proficiency population percentages in the block group is lower than the Glynn County and State of Georgia percentages. The reference population used to compare the block group percentages is Glynn County. Glynn County’s minority population percentage is 63.6, slightly higher than the state average, while the project area’s block group for this project is much lower, at 8 percent minority population. The low-income population percentage for Glynn County is 18.1, slightly higher than the state average, and the low-income population percentage for the project’s block group is 6.0. Finally, the Low-English Proficiency percentage of the project’s block group is zero and the percentage for Glynn County is 3.1, slightly lower than the state average. Based on US Census Data, there are no anticipated environmental justice populations present within the project area.

Table 4: Percentages of Minority, Low-Income, and Low-English Proficiency Populations in the Project Footprint, Glynn County, and the State of Georgia

Geography	Minority Population (%)	Low-Income Population (%)	Low-English Proficiency Population (%)
Census Tract 10, Block Group 1 (Project Area)	8.0	6.0	0
Glynn County	63.6	18.1	3.1
Georgia	52.7	15.1	6.1

Source: ACS Data 2015-2019: <https://www.census.gov/programs-surveys/acs/data.html>

Alternative 1 – No Action

Under the No Action alternative, no construction activities would occur. There would be no benefits, or burdens affecting minority and/or low-income populations.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

Under the Proposed Action alternative, no disproportionately high or adverse impacts on minority and/or low-income populations are anticipated. In compliance with FEMA’s policy implementing EO

12898, Environmental Justice, the No Action and the Proposed Action alternative have been reviewed and present no negative effects to mitigate.

3.4.7 Safety and Security

The GPA requires that all persons who have a legitimate business possess and display their issued and authorized identification credentials. The security objective is to provide for the safety and security of people, cargo, and infrastructure assets while facilitating the productive ingress/egress of commerce at the GPA-owned marine terminal.

Safety and security issues considered include the safekeeping of the port facility and the health and safety of construction personnel. To ensure safety in the terminal, persons must have a Transportation Worker Identification Credential (TWIC) or be escorted by someone with a TWIC. Identification badges must always be prominently displayed on outer clothing while on a GPA restricted marine terminal. Visitor passes are issued on a daily basis and are available at entry gates for persons who only require periodic access to the facilities for legitimate purposes as determined by the GPA. In addition, there is an existing chain link security fence surrounding Parcel B.

EO 13045, Protection of Children from Environmental Health Risks and Safety Risks, requires Federal agencies to identify and assess environmental health and safety risks that may disproportionately affect children. The project footprint is uninhabited with little chance for safety risks for children. There are no nearby residents or schools near the project footprint; therefore EO 13045 is not applicable.

Alternative 1 – No Action

Under the existing conditions, there is a continued safety risk due to Parcel B flooding. Flood risks endanger those working on the parcel and nearby facilities. Once the area is flooded, persons trying to move the cars off Parcel B would be in danger.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

Under the Proposed Action alternative, the risk of flooding would decrease. This would lessen the danger of persons working on and around Parcel B. The CIT would still require a TWIC to enter the facility. The existing chain link security fence would be retained. As discussed in **Section 2.2** above, no changes in stormwater runoff are anticipated and no direct impacts to safety and security are anticipated. Indirect effects to safety and security are related to the anticipated reduction in the flooding conditions, which is an improvement for workers moving the vehicles during inclement weather.

To minimize risks to safety and occupational health, all construction activities would be performed using qualified personnel trained in the proper use of the appropriate equipment including appropriate safety precautions. Additionally, project construction activities would be conducted in accordance with the Occupational Safety and Health Act (OSHA; 29 U.S.C. § 651 et seq.) regulations.

3.5 Historic and Cultural Resources

In addition to review under NEPA, consideration of effects to historic properties is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR § 800. Requirements include identification of significant historic properties that may be affected by the Proposed Action. Historic properties are defined as buildings, structures, objects, sites, or districts included or eligible for listing in or eligible for listing in the National Register of Historic Places (NRHP) (36 CFR 60.4).

As defined in 36 CFR § 800.16(d), the area of potential effect (APE), “is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist.”

In addition to identifying historic properties that may exist in the proposed project’s APE, FEMA must also determine, in consultation with the appropriate State Historical Preservation Office (SHPO)/Tribal Historic Preservation Office (THPO), what effect, if any, the action would have on historic properties. Moreover, if the project would have an adverse effect on these properties, FEMA must consult with SHPO/THPO on ways to avoid, minimize, or mitigate the adverse effect.

The Archaeological and Historic Preservation Act (AHPA) provides for the survey, recovery, and preservation of significant scientific, prehistoric, archaeological, or paleontological data when such data may be destroyed or irreparably lost due to a federal, federally licensed, or federally funded (in part or whole) project. If such data is anticipated to be destroyed or irreparably lost, FEMA would consult with the Secretary of the Interior (SOI) in an effort to recover, preserve, and protect such data.

Other federal laws applicable to this undertaking include the American Indian Religious Freedom Act (AIRFA), under which FEMA is responsible for the protection and preservation of American Indian sites, possessions, and ceremonial and traditional rites. If any of these are anticipated to be affected by the Proposed Action, AIRFA promotes consultation with American Indian religious practitioners by the federal agency. In accordance with 16 U.S.C. 470hh(a), information concerning the nature and location of archaeological resources and traditional cultural properties and detailed information regarding archaeological and cultural resources is confidential.

A desktop survey was conducted including a search of the Georgia Archaeological Site File (GASF), the GNAHRGIS database, and a survey of other online sources including the NRHP, known resource study areas, and both historic aerials and maps. Based on this survey, one previously recorded precontact archaeological site was identified within the project footprint.

On October 15, 2021, the subrecipient sent the Environmental and Historic Preservation (EHP) Screening Form to FEMA concerning Cultural Resources. During the January 25, 2022 meeting, FEMA requested information on the clarification of design, limits of footprint, and the proposed drainage V-gutter being created. A response to these questions was sent to FEMA on February 2, 2022, with follow up concerns submitted to the subrecipient on March 23, 2022. A response to these questions was provided to FEMA on March 24, 2022 with a follow up meeting held on March

28, 2022 (see **Appendix B** for information on the requests for additional information). During the March 28, 2022 meeting it was determined that an anchor trench which would be excavated to a depth of 2 feet below the existing pavement has the potential to impact the previously recorded archaeological site (if it is still present). As the area where the trench will be excavated is currently paved, archaeological monitoring is requested during the excavation of the perimeter anchor trench.

In accordance with Section 106 of the NHPA, 36 CFR § 800, FEMA sent consultation to the Georgia SHPO (GA SHPO) and the Absentee Shawnee of Oklahoma, Kialegee Tribal Town, Muscogee Creek Nation, Poarch Creek, Seminole Tribe of Florida, Shawnee Tribe, Thlopthlocco Tribal Town, on May 19, 2022 informing them of FEMA's determination of No Adverse Effect to Historic Properties for this undertaking in accordance with 36 CFR § 800.5(b), on the condition that archaeological monitoring is done during the portion of construction that could impact the previously recorded archaeological site. Concurrence with FEMA's determination of No Adverse Effect to Historic Properties was received from the GA SHPO on June 15, 2022 (see **Appendix B** for Section 106 Consultation correspondence and Survey Request Memo).

Alternative 1 – No Action

No impacts to historic or cultural resources are anticipated for the No Action alternative as no construction would occur.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative would not impact any historic structures. There is a potential for impacts to a previously recorded archaeological site. Due to the proximity of the site, under-construction monitoring by a professional archaeologist meeting the SOI's Professional Qualification Standards (36 CFR 61) is proposed for ground disturbance associated with anchor trench construction.¹¹ If any historical or archaeological materials are discovered during construction, ground-disturbance would cease and the subrecipient would notify FEMA.

3.5.1 Historic Structures

As discussed in **Section 1.4**, the project site includes the parking lot created in 1992 and the aluminum carport created between 1983 and 1988. No other structures are present within the proposed project footprint. No structures more than 50 years old are located within or adjacent to the project footprint. No historic structures have been identified in the APE.

Alternative 1 – No Action

No historic structures were identified within the APE therefore this alternative would have no effect on historic structures.

¹¹ <https://www.ecfr.gov/current/title-36/chapter-I/part-61>

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

No historic structures were identified within the APE therefore this alternative would have no effect on historic structures.

3.5.2 Archaeological Resources

No previously recorded archaeological sites are located within the APE of the proposed project. One site was previously recorded near the project area prior to the construction of the present parking lot in 1992.

Alternative 1 – No Action

No impacts to archaeological resources are anticipated as a result of the No Action alternative.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative would consist of raising the pavement elevation within the existing footprint of the parking lot. The ground disturbance required for the V-gutter and anchor trench within it is approximately 30 feet wide by 2 feet deep by 67 feet long. No work would take place outside of the existing parking lot pavement. The Proposed Action is not anticipated to impact any archaeological properties; however, the following project conditions provide additional protection to ensure potential archaeological resources are not impacted by Alternative 2:

- 1) Subrecipient would require its contractor to have an SOI qualified professional archaeologist onsite to monitor ground disturbance associated with construction of the anchor trench. If any human remains or potential archaeological resources are inadvertently discovered, the subrecipient would ensure construction activities in the vicinity of the discovery are immediately halted and the subrecipient would notify the State and FEMA. The subrecipient would take reasonable measures to secure and avoid or minimize harm to the site until FEMA concludes consultation with the SHPO, THPOs, and other appropriate consulting parties, including Tribes. A monitoring report would be prepared after construction activities and submitted to FEMA prior to close out.
- 2) The Contractor is expected to use fill from a commercial source or regularly maintained stockpile. If this is not the case, the subrecipient shall inform FEMA of the fill source so required agency consultations can be completed prior to beginning ground disturbing activities.

3.5.3 Tribal Coordination and Religious Sites

In accordance with 36 CFR § 800.8(a)(2), the Advisory Council on Historic Preservation indicates that consultation with Tribes should begin early in the NEPA process regarding the possible effects of disaster recovery efforts on cultural properties of religious or traditional significance, or cultural properties formally designated as Traditional Cultural Properties (TCPs). Amendments to Section 101 of the NHPA in 1992 strengthened the connection between the NHPA and AIRFA (42 USC § 1996). The AIRFA requires consultation with Native American groups concerning proposed actions on sacred sites on federal land or affecting access to sacred sites. It establishes federal policy to protect and preserve for American Indians, Eskimos, Aleuts, and Native Hawaiians their right to free

Draft Environmental Assessment October 2022

exercise of their religion in the form of site access, use and possession of sacred objects, and freedom to worship through ceremonial and traditional rites. AIRFA requires federal agencies to consider the impact of their actions on religious sites and objects important to these peoples, regardless of eligibility for listing on the NRHP.

On November 6, 2000, President Clinton signed EO 13175, Consultation and Coordination with Indian Tribal Governments. The EO directs federal agencies, “to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes...”

No previously recorded cultural resources were identified within the proposed project’s APE. It is anticipated that FEMA would coordinate with federally recognized tribal groups in Georgia in accordance with NEPA, NHPA, and AIRFA.

Alternative 1 – No Action

The No Action alternative would have no effect on known archaeological or religious sites.

Alternative 2 – Elevate Parcel B within the Existing Footprint (Proposed Action)

The Proposed Action alternative is not anticipated to impact any known archaeological or Indian religious sites.

The following project conditions provide additional protection to properties of potential interest to Tribes that may be inadvertently impacted by Alternative 2:

- 1) Subrecipient would require its contractor to have an SOI qualified professional archaeologist onsite to monitor ground disturbance associated with construction of the anchor trench. If any human remains or potential archaeological resources are inadvertently discovered, the subrecipient would ensure construction activities in the vicinity of the discovery are immediately halted and the subrecipient would notify the State and FEMA. The subrecipient would take reasonable measures to secure and avoid or minimize harm to the site until FEMA concludes consultation with the SHPO, THPOs, and other appropriate consulting parties, including Tribes. A monitoring report would be prepared after construction activities.
- 2) Contractor is expected to use fill from a commercial source or regularly maintained stockpile. If this is not the case, the subrecipient shall inform FEMA of the fill source so required agency consultations can be completed prior to beginning ground disturbing activities.

3.6 Comparison of Alternatives

Table 5 summarizes the potential impacts that could result from each alternative on the resource areas discussed in Section 3.

Table 5: Summary of Environmental Impacts

Affected Environment	Alternative 1 - No Action Impacts	Alternative 2 – Proposed Action Impacts	Mitigation
Soils and Geology	<ul style="list-style-type: none"> • No impacts to geology and agricultural lands/farmlands • Long-term indirect impacts may include stormwater drainage and inundation of soils adjacent to the parking lot in the marshland as under the existing condition. 	<ul style="list-style-type: none"> • No impacts to geology • Minor, short-term impacts on soils from earth disturbing activities and negligible long-term impacts on soils • Permanent elevation increase 	<ul style="list-style-type: none"> • A during construction project-specific ESCP would be prepared that include erosion and sedimentation BMPs to reduce potential for impacted soils to erode • The removed material would be disposed of in a permitted off-site authorized disposal facility.
Water Resources and Water Quality	<ul style="list-style-type: none"> • No short-term impacts on water resources or water quality in the project footprint • The long-term condition would result in continued stormwater runoff sheet flow carrying potential pollutants due to vehicles that could affect water quality of the adjacent marshes and Brunswick River 	<ul style="list-style-type: none"> • Stormwater runoff would continue to discharge into the Brunswick River • During flood events, additional inundation carrying potential pollutants off-site would be less frequent • No anticipated adverse short-term effects to water resources or water quality in the area • Long-term effects to adjoining marshes and Brunswick river would be negligible 	<ul style="list-style-type: none"> • A project-specific ESCP would be prepared • Permanent sediment basins around the perimeter • Additional BMPs to prevent erosion and improve water quality would be implemented • Section 402 of the CWA NPDES permit may be required • V-gutter constructed to convey stormwater surface runoff to the perimeter of the parking lot to existing drainage features.

Affected Environment	Alternative 1 - No Action Impacts	Alternative 2 – Proposed Action Impacts	Mitigation
Floodplain Management	<ul style="list-style-type: none"> • Located within Zone AE 11 and AE 10 • Risk of flooding and associated property damages to continue 	<ul style="list-style-type: none"> • Would change the base flood elevation to Zone AE 9 and 10 • Decrease in wave height elevations 	<ul style="list-style-type: none"> • GPA would apply for a LOMR F
Air Quality	<ul style="list-style-type: none"> • In attainment area for all criteria pollutants 	<ul style="list-style-type: none"> • Temporary air quality impacts due to construction • No long-term adverse impacts to air quality 	<ul style="list-style-type: none"> • Construction equipment engine idling would be minimized and equipment maintained • Open construction areas would be minimized and watered as needed to minimize particulates
Coastal Zone Management	<ul style="list-style-type: none"> • No impact to CZMA 	<ul style="list-style-type: none"> • No impacts to CZMA 	<ul style="list-style-type: none"> • No mitigation required
Terrestrial and Aquatic Environment	<ul style="list-style-type: none"> • No anticipated impacts on terrestrial or aquatic environments 	<ul style="list-style-type: none"> • No anticipated impacts on terrestrial or aquatic environments 	<ul style="list-style-type: none"> • A project-specific ESCP would be prepared including BMPs implemented to prevent erosion and siltation and address water quality concerns
Wetlands	<ul style="list-style-type: none"> • No anticipated impacts to wetlands 	<ul style="list-style-type: none"> • No anticipated impacts to wetlands 	<ul style="list-style-type: none"> • FEMA has completed the Eight-Step Decision Making Process • Compliant with EO 11990
Threatened and Endangered Species	<ul style="list-style-type: none"> • No impacts to threatened and endangered species 	<ul style="list-style-type: none"> • No effects to the listed species potentially found within and around the project footprint 	<ul style="list-style-type: none"> • In compliance with Section 7 of the ESA

Affected Environment	Alternative 1 - No Action Impacts	Alternative 2 – Proposed Action Impacts	Mitigation
Hazardous Materials	<ul style="list-style-type: none"> • Nine (9) regulated sites within a 0.5-mile radius of the project footprint • Contaminated materials in the floodplain could be disturbed during a flood event 	<ul style="list-style-type: none"> • Use of construction equipment resulting in minor short-term impacts from leaks of oils, fuels, and lubricants • No impacts to the nine (9) regulated sites within 0.5-mile of the project footprint 	<ul style="list-style-type: none"> • Construction equipment would be kept in good working order • Any hazardous materials found would be managed and disposed of in accordance with the Georgia EPD USTMP and/or the HSRA regulations
Zoning and Land Use	<ul style="list-style-type: none"> • Zoning of basic industrial 	<ul style="list-style-type: none"> • Zoning of basic industrial 	<ul style="list-style-type: none"> • No mitigation required
Visual Resources	<ul style="list-style-type: none"> • No change in visual landscape 	<ul style="list-style-type: none"> • Long term minor/insignificant changes in visual landscape 	<ul style="list-style-type: none"> • No mitigation required
Noise	<ul style="list-style-type: none"> • No noise-sensitive land uses on or around the project footprint 	<ul style="list-style-type: none"> • Short-term ambient noise level change associated with construction activities 	<ul style="list-style-type: none"> • Construction equipment would only be used between 7am and 6pm • No additional mitigation required
Public Service and Utilities	<ul style="list-style-type: none"> • No public services within 1 mile of the project footprint • Five power poles, a carport, and electrical charging station present 	<ul style="list-style-type: none"> • Power poles would require realignment • Carport and electrical charging station would be shifted to the northeast 	<ul style="list-style-type: none"> • Power poles, carport, and electrical charging stations realigned
Traffic and Circulation	<ul style="list-style-type: none"> • No public access roads along project footprint 	<ul style="list-style-type: none"> • Construction vehicles would increase traffic in the short-term • Reduction in number of vehicle spaces by approximately 14 percent 	<ul style="list-style-type: none"> • There would be no road closures or detours associated with the project
Environmental Justice	<ul style="list-style-type: none"> • No impacts to environmental justice communities 	<ul style="list-style-type: none"> • No impacts to environmental justice communities 	<ul style="list-style-type: none"> • No mitigation required.

Affected Environment	Alternative 1 - No Action Impacts	Alternative 2 – Proposed Action Impacts	Mitigation
Safety and Security	<ul style="list-style-type: none"> • Must present TWIC or be escorted by someone with a TWIC card to enter the parcel • Chain link security fence surrounding the parcel • Safety risk of flooding and rearranging vehicles during inclement weather 	<ul style="list-style-type: none"> • No changes in access-TWIC card or be escorted by someone with a TWIC card • Chain link security fence to be retained • Safety risk of flooding decreased 	<ul style="list-style-type: none"> • Risk of flooding would decrease • EO 13045 is not applicable • Construction activities would be performed using qualified personnel and appropriate equipment • Construction activities would be conducted in accordance with OSHA
Historic Structures	<ul style="list-style-type: none"> • No historic properties present 	<ul style="list-style-type: none"> • No historic properties present 	<ul style="list-style-type: none"> • If any historical materials are discovered during construction, ground-disturbance would cease and the subrecipient would notify the proper agencies
Archaeological Resources	<ul style="list-style-type: none"> • No known archaeological resources present 	<ul style="list-style-type: none"> • No known archaeological resources present 	<ul style="list-style-type: none"> • Under-construction monitoring by a professional archaeologist meeting the SOI’s Professional Qualification Standards (36 CFR 61) is proposed for ground disturbance associated with anchor trench construction. A monitoring report would be prepared. • If any historical or archaeological materials are discovered during construction, ground-disturbance would cease and the subrecipient would notify the proper agencies. • Contractor to use fill from a commercial source or regularly maintained stockpile

Affected Environment	Alternative 1 - No Action Impacts	Alternative 2 – Proposed Action Impacts	Mitigation
<p>Tribal and Religious Sites</p>	<ul style="list-style-type: none"> No known archaeological or religious sites 	<ul style="list-style-type: none"> No known archaeological or religious sites 	<ul style="list-style-type: none"> Under-construction monitoring by a professional archaeologist meeting the SOI’s Professional Qualification Standards (36 CFR 61) is proposed for ground disturbance associated with anchor trench construction. A monitoring report would be prepared. If any human or archaeological remains are encountered during the project construction, work would cease and the subrecipient would notify the proper agencies. Contractor to use fill from a commercial source or regularly maintained stockpile

SECTION FOUR: CUMULATIVE IMPACTS

There are two feasible alternatives for this project: the No Action alternative (Alternative 1) and the Proposed Action alternative (Alternative 2). Under the No Action alternative there would be a continued risk to people and property. The potential for damages resulting from storm surge and flood events would remain. There would be no improvement of the current conditions within the current condition.

The implementation of the Proposed Action alternative would reduce the risk of property damage from storm surge and flooding due to heavy rain events and hurricanes by raising the project footprint an average of three feet. The elevated parcel would provide a reliable space to process automobile units without experiencing potential loss. Future impacts to the project site would be reduced by the implementation of the Proposed Action.

At CIT, GPA has also applied for federal funding under FEMA's HMGP for a similar project to prevent flooding on the abutting Parcel A. Like Parcel B, Parcel A experiences damages from storm surge and flooding due to heavy rain events and hurricanes. The adjacent Parcel A project would require an elevation increase to alleviate flooding and the loss of property. It is anticipated to be upgraded in the future as well. There are no other known projects planned in the vicinity. The proposed elevation of Parcel B, if approved, would not likely contribute to any cumulative adverse effect in addition to elevating Parcel A in the future.

SECTION FIVE: PUBLIC PARTICIPATION

To meet the requirements of NEPA and the FEMA Eight-Step Decision-Making Process and compliance with EO 11988, a legal notice was posted in the Brunswick News, the legal organ for Glynn County, on October 18, 2021. In addition, the public notice was also posted on the Georgia Ports website, the Glynn County Board of Commissioners Facebook page, and on the Glynn County EMA and Homeland Security Facebook page (see **Appendix C**).

The public comment period remained open until November 17, 2021. At the end of the comment period, a total of two comments were received via Facebook. One comment expressed concerns about using taxpayer money to make a profit and the other comment was in support of the project (see **Appendix D**).

SECTION SIX: MITIGATION MEASURES AND PERMITS

The subrecipient is responsible for obtaining and complying with all required local, State, and Federal permits and approvals.

If deviations from the proposed scope of work result in substantial design changes, the need for additional ground disturbance, additional removal of vegetation, or any other unanticipated changes to the physical environment, the Recipient must contact FEMA so that the revised project scope can be evaluated for compliance with NEPA and other applicable environmental laws. Failure to adhere to these conditions may jeopardize funding.

The following permits and mitigation measures would be required for the implementation of the proposed CIT Flood Mitigation Project:

1. All removed material would be disposed of off-site outside the floodplain according to requirements by local authorities.
2. A project specific ESCP would be developed and include BMPs such as silt fences, rip rap aprons, and erosion control matting to prevent erosion and improve water quality.
3. A Section 402 of the CWA NPDES permit would likely be required.
4. Runoff discharge would be treated through use of permanent sediment basins around the perimeter of the parking lot to collect sediment and pollution from the parking lot as well as slowing down water velocities into adjacent surface waters.
5. The subrecipient may obtain a LOMR-F.
6. Existing settling ponds would be retained and collect first flush from the parking lot to settle sediment and reduce potential for turbidity and pollutants in adjacent waters.
7. Short-term impacts would be mitigated by using properly operating construction equipment.
8. To minimize potential impacts to the eastern indigo snake, the selected contractor would implement the most current version of USFWS' *Standard Protection Measures for The Eastern Indigo Snake*¹² (currently dated August 12, 2013).
9. Any hazardous or contaminated materials discovered, generated, or used during project implementation would be disposed of and handled by the subrecipient in accordance with applicable federal, state, and local regulations.
10. Power poles, carport, and electrical charging stations would be realigned onsite, within the existing project footprint.
11. There would be no road closures or detours associated with the project.
 1. Chain link security fence to remain.
 2. Project construction activities would be conducted in a safe manner in accordance with Occupational Safety and Health Act (OSHA; 29 U.S.C. § 651 et seq.) regulations.
12. Construction monitoring would be performed by a professional archaeologist meeting the SOI's Professional Qualification Standards (36 CFR 61) for ground disturbance associated with anchor trench construction. A monitoring report would be prepared.
13. If any historical or archaeological materials are discovered during construction, ground-disturbance would cease and the subrecipient would notify the proper agencies.
14. As discussed in **Section 3.1.1** above, the fill soils will come from a Georgia Department of Transportation approved source. The disposal of soils with organic material will go to a county approved disposal site. FEMA approval would be required prior to beginning ground-disturbing activities.

¹²https://www.fws.gov/athens/endangered/herps/STANDARD_PROTECTION_MEASURES_FOR_THE_EASTERN_INDIGO_SNAKE_FL_GA.pdf

SECTION SEVEN: CONSULTATIONS AND REFERENCES

Consultation

Early agency coordination letters for the SHPO and NOAA were submitted to FEMA on October 8, 2021 for transmittal to these agencies. No confirmation of coordination with agencies has been received to date.

References

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APPENDICES

Appendix A Maps and Figures

Appendix B Reports and Agency Correspondence

Appendix C Public Notice & 8 Step

Appendix D Public Comments