

## 7.0 MITIGATION PLAN

Mitigation for permanent impacts will be provided through the purchase of wetland and stream credits from an approved commercial mitigation bank. The Savannah District, US Army Corps of Engineers Regulatory Guidelines to Evaluate Proposed Mitigation Bank Credit Purchases in the State of Georgia was utilized when identifying the appropriate mitigation bank. This analysis is provided below. Using the 2018 Department of the Army Savannah District Corps of Engineers Standard Operating Procedure (SOP), the Qualitative Resource Assessments for Adverse Impact were utilized. SOP worksheets are included in Appendix F. The Qualitative Worksheets for Wetland and Stream Adverse Impacts were utilized to determine the total quantity of wetland and stream credits to be purchased as summarized below. The wetland and stream credits required for the impacts will be purchased prior to the initiation of the associated activities.

Prior to the start of construction, the applicant would purchase the required number of credits for the permanent infrastructure impacts as well as the impacts for the first year of mining (Year 1). The initial purchase would be for 553.36 depressional wetland grandfathered credits and 2,225 stream credits. Upon completion of the first year of mining, the applicant would purchase the required credits for Year 2 prior to commencing further mining. The mitigation for the impacts would continue in a phased manner each year, prior to the start of mining.

| <b>Mitigation Credits Required by Year</b> |                             |                                       |                        |                                       |
|--|-----------------------------|---------------------------------------|------------------------|---------------------------------------|
| <b>Impact Type</b>                         | <b>Depressional Wetland</b> |                                       | <b>Stream</b>          |                                       |
|  | <b>Acres of Impact</b>      | <b>Grandfathered Credits Required</b> | <b>Acres of Impact</b> | <b>Grandfathered Credits Required</b> |
| Infrastructure                             | 25.12                       | 119.92                                | 0.028                  | 2,225                                 |
| Mining Year 1                              | 78.61                       | 433.44                                | 0.000                  | 0                                     |
| Mining Year 2                              | 90.33                       | 541.92                                | 0.000                  | 0                                     |
| Mining Year 3                              | 83.36                       | 396.32                                | 0.000                  | 0                                     |
| Mining Year 4                              | 91.87                       | 489.28                                | 0.000                  | 0                                     |
| Mining Year 5                              | 84.88                       | 405.44                                | 0.000                  | 0                                     |
| Mining Year 6                              | 24.06                       | 143.60                                | 0.000                  | 0                                     |
| <b>TOTAL</b>                               | <b>478.23</b>               | <b>2,529.92</b>                       | <b>0.028</b>           | <b>2,225</b>                          |

The project is located in the St. Mary’s Primary Service Area (PSA) and in the 03070204 8-digit Hydrologic Unit Code (Figure 76). There are three banks located in the PSA with non-tidal wetland credits. The Musket Bay Mitigation Bank currently has sufficient credits available for purchase for the initial start of construction that includes the permanent infrastructure and mining year 1 impacts. The other banks do not have sufficient credits on their own. Therefore, wetland credits will be purchased from Musket Bay Mitigation Bank or from a combination of banks that have credits available. There is also one bank, the Satilla River Mitigation Bank, that is within the tertiary service area. There are no banks with stream credits that service the 03070204 8-digit Hydrologic Unit Code. The Patriots Pride Mitigation Bank is within the secondary service area. Additional information and analyses are provided in the Table 19.