



Goodwyn Mills Cawood

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December 12, 2025

City of Foley
PO Box 1750
Foley, AL

**RE: USACE Section 404 Individual Permit
James Road Extension
Foley, Baldwin County, Alabama**

To Whom it May Concern:

Goodwyn Mills Cawood, LLC (Environmental Division) is pleased to provide this proposal to perform tasks associated with completing the U.S. Army Corps of Engineers (USACE) permitting process. Stream and/or wetland impacts that exceed 0.50 acres require a Section 404 Individual Permit (IP). Based on discussion of the proposed project, an IP would be required for the impacts. Below are tasks and costs associated with obtaining the IP:

Individual Permit Application

A detailed list of the individual permit components is included below. This permit will also require compensatory mitigation for the loss of jurisdictional waters of the U.S. including wetlands and streams. Once the permit application is submitted to the USACE, a public comment period of thirty (30) days will be held and all comments will be addressed accordingly. It is expected that 10 to 14 months will be required to acquire this permit. The tasks required to acquire an individual permit are listed below.

- Preparation of USACE/ADEM Joint Application for Section 404 Permit and Alabama Department of Environmental Management (ADEM) Water Quality Certification (WQC)
- Preparation of USACE IP Environmental Assessment
 - Purpose and Need/Project Analysis and Justification
 - Alternatives Analysis
 - Credit Calculations
 - Mitigation Analysis
 - Wetland WRAP Score Sheets
 - Stream SOP Sheets
 - Maps and Figures, etc.
- On-site meeting with regulatory agencies
- Threatened and endangered species habitat assessment (see details below)
- Cultural Resources Assessment (CRA) (see details below)
- Response to agency and public comments
- Revision to application based on comments



Threatened and Endangered Species Habitat Assessment

Representatives of GMC are prepared to complete a Threatened/Endangered (T&E) species and habitat assessment at the project site. The scope of work will include a review the current T&E species list provided by the U.S. Fish and Wildlife Service and all fieldwork necessary to survey the property for potential habitat. Following the T&E assessment, GMC will prepare and submit the appropriate documentation to be included in the IP application, for a fee of **\$2,000**. The USACE will determine if the USFWS should be consulted. If the USACE or USFWS requests an additional survey for any of the species listed, a separate cost proposal will be provided to perform the tasks.

Cultural Resources Assessment (CRA)

Section 106 of the National Historic Preservation Act of 1996 requires federal agencies to consider the effects on historic properties of projects that they carry out, fund, permit etc. It is likely that the USACE and/or the State Historic Preservation Office (SHPO) will require a CRA to assess the project footprint for cultural resources. GMC is prepared to subcontract a professional archaeologist to perform the CRA. If it is determined that additional, more in-depth surveys are necessary by the professional archaeologist, a separate cost proposal can be provided. The CRA can be completed for a fee of **\$6,270**.

GMC will perform these services for the Section 404 Individual Permit application for a total fee of **\$76,570.00** Additionally, this proposal includes a **\$4,798.25** fee (includes processing fee through Alabama.gov) required by ADEM to review the permit application during the public notice period and issue Water Quality Certification. If the dredge and/or fill of jurisdictional waters of the U.S. exceed 100,000 cubic yards the ADEM fee will change to \$6,545. The USACE will not issue the permit without Water Quality Certification from ADEM. This proposal also includes a **\$110** processing fee to be paid to the USACE upon permit approval.

Below please find a summary of the Individual Permit services and associated costs described above:

INDIVIDUAL PERMIT EXPENSES	COST
On-site meetings with regulatory agencies	\$2,900
Preparation of Environmental Assessment (Project Analysis and Justification, Alternatives Analysis, Credit Calculations, Mitigation Analysis, Maps and Figures, etc.) and application for ADEM Water Quality Certification	\$65,400
Threatened and endangered species habitat assessment	\$2,000
Cultural Resource Assessment	\$6,270
Permit Total	\$76,570
AGENCY FEES	
ADEM Water Quality Certification	\$4,798.25
USACE Fee	\$110
Total Agency Fees	\$4,908.25
TOTAL PERMIT EXPENSES	\$81,478.25



The permit will require compensatory mitigation to offset the impacts to jurisdictional water resources. Based on preliminary layouts of the road expansion (see attached), it appears there will be $1.85 \pm$ acres of wetland impacts. It is estimated that the cost to mitigate these impacts from an USACE approved mitigation bank would range from **\$85,000 to \$110,000**. It should be noted that this estimate assumes all wetlands within the project area are jurisdictional. Final USACE jurisdiction would be determined during the permitting process. It is GMC's opinion that some of the wetlands on site would be considered non-jurisdictional under current regulations. The impact acreage and mitigation cost are both estimates. Once a grading plan for the road extension is complete, the impact acreage and mitigation cost can be refined.

A new proposed waters of the U.S. rule is currently on public notice, ending January 5, 2025. If the new rule becomes effective, it could change the jurisdiction of some, if not all, of the wetlands on site. GMC is prepared to begin the permitting process under the current regulatory regime. However, if the new rule becomes effective and this individual permit application is no longer needed, GMC will cease work and bill for our time to date.

Thank you for giving GMC the opportunity to provide our services. Please give us a call if you would like to discuss this proposal in detail or have any questions. If this proposal meets your approval, please sign and return to us this *Notice to Proceed*. For your convenience in returning the *Notice to Proceed*, my email address is april.henley@gmcnetwork.com. Should you have any questions, or if we may be of further assistance, please do not hesitate to call me at 334-271-3200.

Sincerely,

GOODWYN MILLS CAWOOD, LLC

Notice to Proceed:

A handwritten signature in black ink that reads "April Henley".

April Henley, PWS

Environmental Department Head

Approved

Date