JOINT FEDERAL/STATE APPLICATION FOR THE ALTERATION OF ANY FLOODPLAIN, WATERWAY, TIDAL OR NONTIDAL WETLAND IN MARYLAND

FOR AGENCY USE ONLY

Application Number _____ **Date Determined Complete** _____
Date Received by State _____ **Date(s) Returned** _____
Date Received by Corps _____
Type of State permit needed _____ **Date of Field Review** _____
Type of Corps permit needed _____ **Agency Performed Field Review** _____

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- Please submit 1 original and 6 copies of this form, required maps and plans to the Wetlands and Waterways Protection Program as noted on the last page of this form.
- Any application that is not completed in full or is accompanied by poor quality drawings may be considered incomplete and result in a time delay to the applicant.

Please check one of the following:

RESUBMITTAL: _____ APPLICATION AMENDMENT: _____ MODIFICATION TO AN EXISTING PERMIT: _____
JURISDICTIONAL DETERMINATION ONLY: __ APPLYING FOR AUTHORIZATION X
PREVIOUSLY ASSIGNED NUMBER (RESUBMITTALS AND AMENDMENTS) _____

DATE September 5, 2024

1. APPLICANT INFORMATION:

APPLICANT NAME:

A. Name: Ms. Kate Nolan Bryden B. Daytime Telephone: (410) 685-0000
C. Company: MRP Industrial D. Email Address: KBryden@mrpindustrial.com
E. Address: 509 S. Exeter Street, Suite 216
F. City: Baltimore State: MD Zip: 21202

AGENT/ENGINEER INFORMATION:

A. Name: Mr. Andrew Stine B. Daytime Telephone: (410) 821-7900
C. Company: Bohler Engineering D. Email Address: astine@bohlereng.com
E. Address: 901 Dulaney Valley Road, Suite 801
F. City: Towson State: MD Zip: 21204

ENVIRONMENTAL CONSULTANT:

A. Name: Mr. Henry Leskinen B. Daytime Telephone: (410) 683-7840
C. Company: Eco-Science Professionals, Inc. D. Email Address: espiemail@aol.com
E. Address: P.O. Box 5006
F. City: Glen Arm State: MD Zip: 21057

CONTRACTOR (If known): _____

A. Name: _____ B. Daytime Telephone: _____
C. Company: _____ D. Email Address: _____
E. Address: _____
F. City: _____ State: _____ Zip: _____

RECEIVED
SEP 25 2024
WATER AND SCIENCE ADMIN.
REGULATORY SERVICES COORD.

PRINCIPAL CONTACT:

A. Name: Mr. Henry Leskinen B. Daytime Telephone: (410) 683-7840
C. Company: Eco-Science Professionals, Inc. D. Email Address: espiemail@aol.com
E. Address: P.O. Box 5006
F. City: Glen Arm State: MD Zip: 21057

2. PROJECT DESCRIPTION

a. GIVE WRITTEN DESCRIPTION OF PROJECT:

The project involves the re-development of the former Bainbridge Naval Training Center into an industrial park. The re-development is occurring in phases. As part of Phase 1A, the applicant is being required to make geometric improvements to MD Route 275 and Diamond Jim Road and construct a new road (Powers Road) into the project site. These road improvements will require impacts to various regulated resources. See attached Supplemental Permit Narrative for summary of resource impacts

Has any portion of the project been completed? X Yes ____ No If Yes, explain: Other portions of the Bainbridge site which get access from MD Rt. 276 have been re-developed with industrial buildings

Is this a residential subdivision or commercial development? X Yes ____ No

If yes, total number of acres on property 1,191.5 acres

Will there be temporary or permanent tree clearing occurring on the overall project site (i.e., uplands and wetlands), including but not limited to, tree clearing for site development, road/highways, utilities, mining, stormwater management, restoration, energy production and transmission, etc.)? Yes X No ____

If yes, total estimated acres of tree clearing for the overall project site: 23 acres

Does the application propose temporary fill impacting wetlands or waterways that will remain in place for more than one year? ____ Yes X No

b. ACTIVITY: Check all activities that are proposed in the wetland, waterway, floodplain, and nontidal wetland buffer as appropriate.

A.	X filling	D.	____ flooding or impounding water	F.	X grading
B.	____ dredging			G.	X removing or destroying vegetation
C.	X excavating	E.	____ draining	H.	X building structures

Area for item(s) checked: Permanent Wetland 4,384 (sq. ft.) Permanent Buffer (Nontidal Wetland Only) 18,008 (sq. ft.)

Expanded Buffer (Nontidal Wetland Only) ____ (sq. ft.)

Area of stream impact 1,233 (sq. ft.) (Permanent); 3,537 sq.ft. (Temporary)

Length of stream affected 126 (linear feet) (Permanent); 196 LF (Temporary)

c. TYPE OF PROJECTS: Project Dimensions

For each activity, give overall length and width (in feet), in columns 1 and 2. For multiple activities, give total area of disturbance in square feet in column 3. For activities in tidal waters, give maximum distance channelward (in feet) in column 4. For dam or small ponds, give average depth (in feet) for the completed project in column 5. Give the volume of fill or dredged material in column 6.

		Length (Ft.) 1	Width (Ft.) 2	Area (Sq. Ft.) 3	Maximum/Average Channelward Encroachment 4		Pond Depth 5	Volume of fill/dredge material (cubic yards) below MHW or OHW 6
A.	____ Bulkhead							
B.	____ Revetment							
C.	____ Vegetative Stabilization							
D.	____ Gabions							
E.	____ Groins							
F.	____ Jetties							
G.	____ Boat Ramp							
H.	____ Pier							
I.	____ Breakwater							
J.	____ Repair & Maintenance							
K.	____ Road Crossing							
L.	____ Utility Line							
M.	____ Outfall Construction							
N.	____ Small Pond							
O.	____ Dam							
P.	____ Lot Fill							
Q.	____ Building Structures							
R.	X Culvert	(See Supplemental Permit Narrative for summary of impacts)						
S.	____ Bridge							
T.	____ Stream Channelization							
U.	____ Parking Area							
V.	____ Dredging							

1. X New 2. ____ Maintenance 3. ____ Hydraulic 4. ____ Mechanical

W. X Other (explain) Geometric road improvements (see Supplemental Permit Narrative for breakdown of impacts)

d. PROJECT PURPOSE: Give brief written description of the project purpose:
The purpose of the project is to re-develop the former Bainbridge Naval Training Center into an industrial park. The site is ideal for this use given its large size and proximity to major highways. This re-development will bring numerous good paying jobs to Cecil County, which will enhance the County's tax base. The proposed road improvements are being required by the State of Maryland and Cecil County to ensure that the road network is adequate to handle the traffic, particularly large truck traffic, that the project is expected to generate.

3. PROJECT LOCATION:

a. LOCATION INFORMATION:

A. County: Cecil B. City: Port Deposit C. Name of waterway or closest waterway Mill Creek

D. State stream use class designation: Use III-P

E. Site Address or Location:
MD Route 275 and Diamond Jim Road, Port Deposit, Cecil County, MD

F. Directions from nearest intersection of two state roads:
From the intersection of MD Route 222 and MD Route 275, proceed north on MD Route 275 approximately 0.65 miles to intersection with Diamond Jim Road. Road improvements are proposed along a 2,900 linear foot +/ section of southbound MD Route 275 both north and south of the intersection of Diamond Jim Road: and along Diamond Jim Road from MD Route 275 to Craigstown Road. A new road , Powers Road, will extend from the Craigstown Road/Diamond Jim Road intersection and extend north/west into the site.

Is your project located in the Chesapeake Bay Critical Area (generally within 1,000 feet of tidal waters or tidal wetlands)?:

____ Yes __X__ No

H. County Book Map Coordinates (Alexandria Drafting Co.); Excluding Garrett and Somerset Counties:
Map: 9 Letter: E, F, G Number: 8.0 - 9.0 (to the nearest tenth)

I. FEMA Floodplain Map Panel Number (if known): Not known

J. 1. 39.6089 latitude 2. -76.0694 longitude

b. ACTIVITY LOCATION: Check one or more of the following as appropriate for the type of wetland/waterway where you are proposing an activity:

A. ____ Tidal Waters
B. ____ Tidal Wetlands
C. ____ Special Aquatic Site (e.g., mudflat, vegetated shallows)
D. _X_ Nontidal Wetland
E. _X_ 25-foot buffer (nontidal wetlands only)
F. ____ 100-foot buffer (nontidal wetland of special State concern)
G. _X_ In stream channel
1. ____ Tidal 2. _X_ Nontidal
H. _X_ 100-year floodplain (outside stream channel)
I. ____ River, lake, pond
J. ____ Other (Explain)

c. LAND USE:

A. Current Use of Parcel Is: 1. Agriculture: Has SCS designated project site as a prior converted cropland? ____ Yes ____ No

2. _X_ Wooded 3. ____ Marsh/Swamp 4. _X_ Developed

5. _X_ Other: Abandoned military training center, ex. road network

B. Present Zoning Is: 1. ____ Residential 2. _X_ Commercial/Industrial 3. ____ Agriculture 4. ____ Marina 5. ____ Other

C. Project complies with current zoning _X_ Yes ____ No

THE FOLLOWING INFORMATION IS REQUIRED BY THE STATE (blocks 4-7):

4. REDUCTION OF IMPACTS: Explain measures taken or considered to avoid or minimize wetland losses in F. Also check Items A-E if any of these apply to your project.

A. _X_ Reduced the area of disturbance
B. ____ Reduced size/scope of project
C. _X_ Relocated structures
D. ____ Redesigned project

E. ____ Other _____

F. Explanation See Supplemental Permit Narrative for discussion of minimization efforts

Describe reasons why impacts were not avoided or reduced in Q. Also check Items G-P that apply to your project.

G. ____ Cost
H. ____ Extensive wetlands on site
I. __X__ Engineering/design constraints
J. ____ Other natural features
K. ____ Parcel size
L. __X__ Other regulatory requirement
M. ____ Failure to accomplish project purpose
N. ____ Safety/public welfare issue
O. ____ Inadequate zoning
P. ____ Other

Q. Description

See attached Supplemental Permit Narrative for discussions as to why resource impacts could not be further minimized.

5. LETTER OF AUTHORIZATION: If you are applying for a letter of authorization for activities in nontidal wetlands and/or their buffers, explain why the project qualifies:

A. ____ No significant plant or wildlife value and wetland impact
   1. ____ Less than 5,000 square feet
   2. ____ In an isolated nontidal wetland less than 1 acre in size
B. ____ Repair existing structure/fill
C. ____ Mitigation Project
D. ____ Utility Line
   1. ____ Overhead
   2. ____ Underground
E. Other (explain)

F. __X__ Check here if you are **not** applying for a letter of authorization.

IF YOU ARE APPLYING FOR A LETTER OF AUTHORIZATION, PROCEED TO BLOCK 10

6. ALTERNATIVE SITE ANALYSIS: Explain why other sites that were considered for this project were rejected in M. Also check any items in D-L if they apply to your project. **(If you are applying for a letter of authorization, do not complete this block.)**

A. ____ 1 site
B. ____ 2 - 4 sites
C. ____ 5 or more sites

Alternative sites were rejected/not considered for the following reason(s):

D. ____ Cost
E. __X__ Lack of availability
F. ____ Failure to meet project purpose
G. ____ Located outside general/market area
H. ____ Greater wetlands impact
I. ____ Water dependency
J. ____ Inadequate zoning
K. ____ Engineering/design constraints
L. ____ Other

M. Explanation: No other site is available in the market area which has the appropriate zoning or contiguous acreage to support a project of this magnitude. See attached Supplemental Permit Narrative for more details

7. PUBLIC NEED: Describe the public need or benefits that the project will provide in F. Also check Items in A-E that apply to your project. **(If you are applying for a letter of exemption, do not complete this block.)**

A. __X__ Economic
B. __X__ Safety
C. ____ Health/welfare
D. ____ Does not provide public benefits
E. ____ Other ____

F. Description

The re-development of the Bainbridge Naval Training Center into an industrial park will provide numerous jobs to the region and significantly increase tax revenue for Cecil County. The road improvements which are the basis for this permit application are being required by the State of Maryland and Cecil County to provide safe ingress and egress. See Supplemental Permit Narrative for more details

8. MITIGATION PLAN: Please provide the following information. **(If you are applying for a letter of authorization outside of the Critical Area, do not complete this block.)**

9. Description of a monetary compensation proposal, if applicable (for **state requirements** only). Attach another sheet if necessary.

b. Give a brief description of the proposed mitigation project.

The project will result in permanent impacts to 4,384 square feet of forested/scrub-shrub wetlands. Mitigation for these impacts must be provided at 2:1, for a mitigation requirement of 8,768 square feet. The applicant proposes to meet this mitigation obligation through purchase of credit in a State-approved wetland mitigation bank. Should a mitigation bank not be available, we would request that the State allow this mitigation to be met through payment into the State Wetland Compensation Fund. The 962 square feet of temporary wetland impacts will be mitigated for in place. Disturbed areas will be restored to pre-construction grades and the areas stabilized with a wetland seed mix.

c. Describe why you selected your proposed mitigation site, including what other areas were considered and why they were rejected.

d. Describe how the mitigation site will be protected in the future.

9. HAVE ADJACENT PROPERTY OWNERS BEEN NOTIFIED? A. _____ Yes B. __X__ No*
Provide names and mailing addresses below (Use separate sheet, if necessary). **(If you are applying for a letter of exemption, do not complete this block.)** * Adjacent property owners will be notified once a tracking number is assigned to project
a. b. c.

10. OTHER APPROVALS NEEDED/GRANTED:

A. a. Agency	b. Date Sought	c. Decision 1. Granted	2. Denied	d. Decision Date	e. Other Status
Cecil County (for roadwork)	12/23				Under review

B. **FEDERALLY AUTHORIZED CIVIL WORKS PROJECTS**: Does the project require permission from the Corps pursuant to 33 U.S.C. 408 because it will alter or temporarily or permanently occupy or use a U.S. Army Corps of Engineers' federally authorized civil works project, structure, property, or easement (e.g., federal navigation channel, flood control levees, dams and reservoirs, lake property, etc.)?

_____Yes __X__ No

If yes, have you submitted a written request for Section 408 permission from the Corps district having jurisdiction over that project (i.e., Baltimore district in Maryland or Philadelphia district in C & D canal)? _____ Yes _____No

If yes, please provide the date your request was submitted to the Corps district: _____

C. EXISTING CORPS, MDE, OR ENVIRO[illegible]NTAL PROTECTION AGENCY SITE PROTEC[illegible]N INSTRUMENTS: Is the proposed work located in an area encumbered by an existing site protection instrument such as a conservation easement, deed restriction, or declaration of restrictive covenants required as a condition of a prior U.S. Army Corps of Engineers', Maryland Department of the Environment, or Environmental Protection Agency authorization? _____ Yes __X__ No

11. HISTORIC PROPERTIES: Is your project located in the vicinity of historic properties? (For example: structures over 50 years old, archeological sites, shell mounds, Indian or Colonial artifacts). Provide any supplemental information in Section 12.

A. __X__ Yes B. _____ No C. _____ Unknown

12. ADDITIONAL INFORMATION: Use this space for detailed responses to any of the previous items. Attach another sheet if necessary:

The Maryland Historical Trust identifies the Bainbridge Naval Training Center (CE-1284) as a historic element

Check box if data is enclosed for any one or more of the following (see checklist for required information):

A. __X__ Soil borings
B. __X__ Wetland data sheets
C. _____ Photographs
D. _____ Field surveys
E. _____ Alternate site analysis
F. _____ Market analysis
G. _____ Site plan
H. __X__ Avoidance and minimization analysis

I. __X__ Other (explain)

Figures and full size drawings detailing the resource impacts associated with the proposed road improvements and road extension along with a Supplemental Permit Narrative providing more in-depth discussion of resource impacts an d avoidance and minimization efforts are included with the application

CERTIFICATION:

Application is hereby made for a permit or permits to authorize the work described in this application. I hereby designate and authorize the agent named above to act on my behalf in the processing of this application and to furnish any information that is requested. I certify that the information on this application form and on the attached plans and specifications is true and accurate to the best of my knowledge and belief. I understand that any of the agencies involved in authorizing the proposed works may request information in addition to that set forth herein as may be deemed appropriate in considering this proposal. I certify that all wetlands, other special aquatic sites, and other waters, such as lakes and ponds, and all streams have been identified and delineated on site, and that all jurisdictional wetlands have been delineated in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual and appropriate regional supplement(s). I grant permission to the agencies responsible for authorization of this work, or their duly authorized representative, to enter the project site for inspection purposes during working hours. I will abide by the conditions of all permit(s) or license(s) if issued and will not begin work without the appropriate authorization. I also certify that the proposed works are consistent with Maryland's Coastal Zone Management Plan. All information, including permit applications and related materials, submitted to MDE may be subject to public disclosure consistent with the Maryland Public Information Act, §4-101 et seq., General Provisions Article of the Maryland Code and the Freedom of Information Act, 5 USC Section 552 et seq. Pursuant to Clean Water Act Section 404(o), 33 USC 1344 (o), permit applications and permits will be available to the public. I understand that I may request that additional required information be considered confidential under applicable laws. I further understand that failure of the landowner to sign the application will result in the application being deemed incomplete.

LANDOWNER MUST SIGN: Kate Nolan Bryden DATE: 09-05-2024

PRINTED NAME OF LANDOWNER Kate Nolan Bryden

Authorities: Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section 103, 33 USC 1413; Regulatory Programs of the Corps of Engineers, 33 CFR 320-332. Principal Purpose: Information provided on this JPA will be used in evaluating the application for a permit. Routine Uses: This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public and may be made available as part of a public notice. Submission of requested information is voluntary, however, if information is not provided, the permit application cannot be evaluated nor can a permit be issued.

State Authorities: **Nontidal Wetlands Protection Act, Md. Ann. Code, Envir., Title 5, Subtitle 9; Waterway Construction, Md. Ann. Code, Envir., Title 5, Subtitle 5; Tidal Wetlands Act, Md. Ann. Code, Envir., Title 16.**

BEST MANAGEMENT PRACTICES VERIFICATION: I verify that my project will meet all Endangered Species Act Best Management Practices and Time of Year Restriction applicable to work in tidal waters and wetlands as required by the MDSPGP (see Section VII, General Conditions #14-15).

[X] **Yes** [ ] **No** [ ] **Unknown**

Refer to the application instructions and the MDSPGP for additional information regarding these Best Management Practices.

[X] **I am the property owner/applicant and do not want to be contacted by MDE. All correspondence should occur with my authorized agent /principal contact designated in Section 3, located on the 1st page of this application. (By initializing the box, you are acknowledging that you will not receive any correspondence directly from MDE). I understand a copy of MDE's final decision regarding this application will be sent to me. This opt-out option does not apply to the U.S. Army Corps' correspondence, which will continue to be with the applicant/permittee.**

Permit Application Screening Form

Tracking No:	202461483				
Applicant:	MRP Industrial - Road Improvements				
County:	Cecil	ADC Map:	0 X 0	Ed:	
Project Type:	Culvert , Road				
Waterbody:	Mill Creek				
Stream Use:	III-P	Fed. Nav. Channel?	No		
100 Year Floodplain:	Yes	Within 150' of channel?	No		
Critical Area/1000' Buffer:	No	FEMA FIRM Index:	24015C0127D		
Floodway?	No	Floodplain Description:	A		

Location

State Plane 83 Meters:	**N** 216013	**E** 479919	MD Watershed (8 Digit):	02130609	
Latitude/Longitude 83:	**N** 39° 36'32"	**W** -76° 4.'10"	HUC Basin:	020600	
DOQQ:	HAVRE DE GRACE NW		HUC Watershed:	02060002	

Tidal Wetland Boundary #:
Aerial Photo #:
6" Statewide Photo Grid #: Z330
Taxmap: CECI029

Reference Information

Tier II Streams	No		Polygon ID:	
Tier II Catchments	Yes	Mill Creek 1 Cecil Co	N/A	
Stronghold Watershed	No		Has Interest Points?	N/A
MBSS	No		Has Records?	N/A
TMDL	Yes	Not Impaired	Has Attachments?	N/A
NWI Wetlands:	Yes	Types (if any): PFO1A		
DNR Wetlands:	Yes	Types (if any): R2UBH		
MHT:	**Yes**	**15+ Acres**		
Sens/Endg Species:	**Yes**	**GROUP 2**		
NOB:	No			
WSSC:	No	SAV: No		

Screened By: CNB Date Screened: 9/25/2024

Comments: **MHT: 15+ Acres**
DNR: Trout-L Susquehanna River-Trout Present-Cold Bentho
SSPRA Group 2

Note: Anadromous Fish Watershed Present

BAINBRIDGE MRP INDUSTRIAL PHASE 1A ROAD IMPROVEMENTS
JOINT PERMIT APPLICATION
SUPPLEMENTAL INFORMATION

Section 2 - Description of Project

A. Description of Specific Resource Impacts

The proposed road improvements associated with the Bainbridge Phase 1A development will result in the following resource impacts:

1. **Permanent** impacts to 4,384 square feet of forested nontidal wetlands, 18,008 square feet of 25-foot State nontidal wetlands buffer, 126 linear feet (1,233 square feet) of Use III-P stream channel (Mill Creek and a tributaries to Mill Creek), and 25,259 square feet of associated 100 year floodplain for the following roadwork:

    a. Widening of a section of Craigtown Road near the intersection of Diamond Jim Road. Included in this widening work is removal and replacement of an existing stream culvert crossing with a 48-inch culvert pipe;

    b. Widening of Diamond Jim Road between MD Route 275 and Craigtown Road. Including in this widening is the extension of 14-foot by 12-foot culvert pipe which carries Mill Creek underneath Diamond Jim Road;

    c. Construction of acceleration/deceleration lanes along the MD Route 275 southbound road frontage both to the north and south of the intersection with Diamond Jim Road; and

    d. Construction of a new access road (Powers Road) from the intersection of Diamond Jim Road and Craigtown Road into the industrial park.

2. **Temporary** impacts to 962 square feet of forested nontidal wetlands, 18,920 square feet of 25-foot State wetland buffer and 148 linear feet (2,883 square feet) of Use III-P stream channel to allow for installation of sediment control devices; installation of sand bag diversions and stream pump-arounds; re-grading of existing road slopes, and for construction equipment access associated with the required road improvements.

Section 4 -Reduction of Impacts

F. Explanation

The applicant and project engineer have undertaken a number of measures to minimize impacts to wetlands and streams. The actual development of Phase 1a will not require any resource impacts other than those associated with the road improvements. The section of Powers Road that will be constructed into the site has been designed to almost entirely avoid resource impacts. Impacts are limited to one small wetland pocket. The extent of the road improvements has been limited to the minimal amount needed to satisfy the requirements of the Maryland State

Highway Administration and Cecil County. Slope grades along the sections of the roads to be widened have been steepened to the greatest extent practicable to minimize the width of disturbance and extent of resource impacts. The existing culvert crossing underneath Diamond Jim Road will be extended (in lieu of being replaced) to minimize disturbance to the stream channel. A sand bag diversion/stream pump-around system will be incorporated during the crossing replacement along Craigtown Road and during the extension of the culvert underneath Diamond Jim Road to allow the contractor to work "in the dry" to minimize water quality impacts. The replacement culvert underneath Craigtown Road will be depressed one-foot to allow for accumulation of natural streambed material in the culvert and to allow for aquatic species migration. Disturbed areas near resource features will be stabilized at the end of each construction day to reduce the potential for sedimentation in the event of rain. Portions of the wetlands, wetland buffers and stream channels temporarily impacted by installation of sediment control, slope grading and the de-watering device/stream diversion will be returned to pre-construction grades upon completion of construction. Temporarily disturbed wetland areas will be seeded with an appropriate wetland seed mix and planted with a mix of native wetland tree and shrub species. These measures in total will minimize the impacts to regulated resource resulting from the proposed road improvements.

Q. Describe Reasons Why Impacts Were Not Avoided or Further Reduced

A number of factors prevented further minimization or elimination of wetland, wetland buffer, stream and floodplain impacts. One primary factor was other government agency requirements. All of the resource impacts identified in this application, with the exception of the minor wetland and wetland buffer impacts associated with the construction of Powers Road, could be avoided if the applicant was not required to make the geometric improvements to MD Route 275, Diamond Jim Road, and Craigtown Road. However the Maryland State Highway Administration and Cecil County Department of Public Works are requiring the applicant to make the various road improvements (road widening, construction of acceleration and deceleration lanes, culvert replacement) to ensure that the road network can safely handle the increased truck traffic expected to be generated by the industrial park. Another factor preventing further minimization of resource impacts was the location and proximity of wetlands, wetland buffers, streams and floodplains to the existing road network to be improved. Mill Creek crosses underneath Diamond Jim Road. In order to widen the road as required by Cecil County, the existing stream crossing must be extended to accommodate the wider road profile. Additionally, forested wetlands, associated buffers, and a 100 year floodplain are present adjacent to Mill Creek, along the toe of the existing Diamond Jim Road fill slope. There is no way to widen the road without impacting these resources due their locations at the base of the existing road slope.

Similar situations exist along Craigtown Road and southbound MD Route 275. A tributary to Mill Creek currently flows through a culvert underneath Craigtown Road just south of the intersection with Diamond Jim Road. In order to make the road improvements required by the Cecil County, the culvert pipe must be replaced/extended, resulting in stream/wetland impacts. Extensive forested wetlands, tributary stream channels, and portions of the 100 year floodplain associated with Mill Creek are present along the base of the MD Route 275 road slope where the construction of the acceleration and deceleration lanes are proposed. There is no physical way to widen the road profile without some impacts to these resources.

In summary, it is our opinion that resource impacts have been minimized to the greatest extent practicable. The project engineer has steepened the grade slopes in proposed road

widening areas to minimize the extent of encroachment into wetlands, floodplains, and buffers. Stream diversions have been incorporated into the design to allow for in-stream work to occur in the dry, minimizing impacts to water quality. As result of these efforts, permanent wetland impacts have been kept to less than 4,500 square feet and permanent stream impacts less than 130 linear feet. Total avoidance or further minimization of resource impacts is not possible since the State Highway Administration and Cecil County will not approve the site development plan if these road improvements are not provided.

Section 6 - Alternatives Site Analysis

M. Explanation

There are no other sites in the market area which have the attributes of the site. The first attribute is the geographic location of the site. The site is located close to Interstate 95 and is approximately equidistant from the Baltimore/Washington and Philadelphia areas. This allows the site, which is to be developed as an industrial park with large logistics centers and shipping hubs, to service a large market area. Another attribute is the size of the site. The site is the largest contiguous block of industrially-zoned property along the Interstate 95 corridor in Cecil County, consisting of over 1,200 acres. This acreage can support the large industrial buildings, logistic centers, and shipping hubs proposed for the site with minimal impacts to regulated resources. Another attribute of the site is that it was previous developed. The site was used by the United States Navy between 1942-1976 as a training center for recruits. The training center consisted of numerous buildings, outdoor training facilities, and an extensive road network. Following the deactivation of the base by the Navy in 1976, portions of the site were used by the Department of Labor as a Job Corps training center until 1990 at which time the site was closed. Removal of the previous buildings and old infrastructure plus hazardous materials removal was performed by the Department of the Navy between 1990-2006, Most of the proposed development will occur on portions of the site that were previously developed/impacted by the Navy, with little impact proposed to significant natural habitats. Another advantage of the site is that it is serviced by an excellent transportation network. The site has access to MD Route 275, MD Route 276, and MD Route 222. These roads will allow truck traffic generated by the development easy access to Interstate 95, U.S. Route 40, and U.S. Route 1.

In summary, the site is the only suitable one for the proposed development given the factors discussed above.

Section 7 - Public Need

F. Description

When the United States Congress authorized the Navy to sell or transfer the property to others on November 3, 1986, it was stated the primary goal was to allow for effective re-use of the property by the State of Maryland and the people of Cecil County. The proposed re-development accomplishes this goal. The logistics centers and shipping hubs to be constructed on the site will provide numerous jobs to the region, significantly enhancing Cecil County's property tax and income tax revenue stream. Re-development of the site will spur secondary development, as new housing, retail businesses, and other services move into the area to support this development. This additional economic activity will further benefit the County.

Copy w/ culvert load evaluation

BAINBRIDGE MRP INDUSTRIAL PHASE 1A ROAD IMPROVEMENTS

JOINT PERMIT APPLICATION

prepared for:

MRP Industrial
c/o Bohler Engineering
901 Dulaney Valley Road, Suite 801
Towson, Maryland 21204

prepared by:

Eco-Science Professionals, Inc.
P.O. Box 5006
Glen Arm, Maryland 21057

and

Bohler Engineering
901 Dulaney Valley Road, Suite 801
Towson, Maryland 21204

September 5, 2024

Bainbridge MRP Industrial Phase 1A
Joint Permit Application

I. Introduction

The Bainbridge project consists of re-development of a former Naval Training Center into an industrial park consisting of logistics centers and shipping hubs. The entire Bainbridge site consists of approximately 1,200 acres and is located north and east of Maryland Route 222 (Bainbridge Road), southeast of Maryland Route 276 (Jacob Tome Memorial Highway) and east of Barton Road, in the Port Deposit section of Cecil County, Maryland. (See Figure 1). The applicant, MRP Industrial, began re-development of the site is 2022 and is currently working on Phase 1A, which is located on the southeastern end of the site. As part of Phase 1A, the Maryland State Highway Administration (MDSHA) and Cecil County Department of Public Works are requiring the applicant to make geometric improvements to MD Route 275, Diamond Jim Road, and Craigtown Road in order to accommodate the trunk traffic to be generated by this development. The applicant also needs to construct a new access road (Powers Road) into this portion of the site. The geometric improvements and new road will require impacts to nontidal wetlands, associated State wetland buffers, stream channels, and 100 year floodplain. The applicant is requesting authorization for these impacts. This document summarizes the resource impacts proposed for the project.

II. Existing Conditions

The subject property consists of the former Department of Defense Bainbridge Naval Training Center. The center was constructed in 1942 to train soldiers in response to American involvement in World War II. The center continued to perform military functions intermittently until 1976 when it was deactivated by the Department of Defense. A small portion of the site was used by the Department of Labor as a Job Corps Training Center until 1990. Subsequently Congress deemed the site excess property and authorized the Secretary of the Navy to dispose of the property. After undertaking a number of environmental remediation measures, the property was transferred to the Bainbridge Development Corporation in 2006.

The site is located near the boundary of the Coastal Plain and Piedmont physiographic provinces. In Cecil County, this interface is characterized by hilly terrain bisected by numerous small streams.

The majority of the Bainbridge Property was previously utilized by the Department of the Defense as a naval training center. The past development of the site for this use had significant impacts on the natural resources present on the property. Large portions of the site were graded and either covered with paving, buildings, and maintained lawn areas. Prior to the transfer of the property to the Bainbridge Development Corporation, most of the buildings and other structures were removed and vegetative maintenance ceased. Consequently, a large portion of the site has developed into overgrown old fields dominated by a variety of native and non-native grass, weed, and vine species; including bush clover (*Lespedeza* sp.), Kentucky fescue (*Schedonorus arundinaceus*), Kentucky bluegrass (*Poa pratense*), crabgrass (*Digitaria* spp.), Japanese stiltgrass (*Microstegium*

PROJECT
LIMITS

BAINBRIDGE MRP INDUSTRIAL
PROPOSED ROAD IMPROVEMENTS
NEAR PORT DEPOSIT, CECIL COUNTY, MD
SITE VICINITY MAP
SCALE: 1" = 2000' DATE: 09/04/2023

Figure 1

vimineus), broomsedge (*Andropogon virginicus*), Japanese honeysuckle (*Lonicera japonica*), bittersweet (*Celastrus orbiculatus*), Canada thistle (*Cirsium arvense*), plantain (*Plantago rugelii*), goldenrods (*Solidago* spp.), asters (*Aster* sp.), common milkweed (*Asclepias syriaca*), and mugwort (*Artemisia vulgaris*). Woody plant succession is extensive in many of these old fields and in some places is beginning to overwhelm the herbaceous community. Common successional species include black locust (*Robinia pseudo-acacia*), black cherry (*Prunus serotina*), crabapples (*Malus* spp.), callery pear (*Pyrus calleryana*), Norway maple (*Acer platanoides*), sassafras (*Sassafras albidum*), box-elder maple (*Acer negundo*), bush honeysuckle (*Lonicera tatarica*), blackberries (*Rubus* spp.), and multiflora rose (*Rosa multiflora*). Most of these overgrown old fields have developed in areas that were regularly mown during active military use or in areas were paving has deteriorated to the point where plant growth could occur.

Numerous forest types exist on the site. Some of the forest consists of a younger disturbed pioneer community and is comprised of the same pioneer tree and shrub species noted in the old field successional areas interspersed in places by larger trees that were part of the landscaping at the facility before the lawn areas were left unmaintained. Shrub and vine cover are extremely heavy in much of this young forest. Bittersweet vine, Japanese honeysuckle, poison ivy (*Toxicodendron radicans*), and multiflora rose form an almost impenetrable wall of vegetation in some areas. The overall condition of this forest type is poor. A mid-age tulip poplar (*Liriodendron tulipifera*) dominated community is present on a ridgetop and adjoining upper slopes on the southwestern portion of the property. Red maple (*Acer rubrum*), black cherry, black locust and some American sycamore (*Platanus occidentalis*) are common canopy associates. Spicebush (*Lindera benzoin*), multiflora rose, and wineberry are common in the shrub layer. Other forest types include a mature mixed oak-poplar-beech association dominated by tulip poplar, American beech (*Fagus grandifolia*), white oak (*Quercus alba*), red oak (*Quercus rubra*), red maple, black gum (*Nyssa sylvatica*), and pignut hickory (*Carya glabra*); a more xeric oak forest; and pockets of tulip poplar/red maple dominated forest. The condition of the forest within the study area is highly variable. Some of the mature forest on steep slopes is in very good condition and still maintains a high level of native species diversity. However, in much of the forest, invasive species cover, especially in the herbaceous and vine layers, has increased significantly since our original site investigations in 2005-2006 and is negatively impacting many of the stands. Particularly troublesome is Japanese stiltgrass, kudzu (*Pueraria lobata*) and wavy basketgrass (*Oplismenus undulatifolius*), the latter two colonizing the site since our original field work. Emerald ash borer has decimated most of the white ash (*Fraxinus americana*) onsite and spotted lanternfly, another recent non-native addition, is present within the forest at major infestation levels and will begin to negatively impact trees.

Existing cover in the area proposed for road improvements includes paved portions of southbound MD Route 275, Diamond Jim Road, and Craigtown Road; maintained lawn/grass/weeds (along the MD Route 275 road frontage) and a mixed oak/poplar forest dominated by red oak, tulip poplar, white oak, American beech, chestnut oak, and red maple. Drainage from the study area flows into Mill Creek. Mill Creek was recently re-classified as Use III-P - Natural Trout Waters and Public Water Supply - by the Maryland Department of the Environment (MDE) due to colder water temperatures measured in the stream. Mill Creek is not classified as Tier II waters by MDE however

the site is within a Tier II catchment basin (Mill Creek I Cecil County). This catchment basin currently has no assimilative capacity.

A number of wetland systems and regulatory waters are present within the road improvement study area. System A is an ephemeral channel which originates from a headwall at the base of the MD Route 275 road slope, approximately 150 feet north of the intersection with Diamond Jim Road. No baseflow is present within the channel however the channel has a clearly defined bed and bank and an evident high watermark. This channel would be regulated by the USACOE but not be MDE.

System B is a seasonal headwater seep located on the south side of Diamond Jim Road, at the base of the road fill slope approximately 150 feet west of MD Route 275. Dominant vegetation in this wetland includes red maple, winterberry (*Ilex verticillata*), greenbrier (*Smilax rotundifolia*), and Japanese stiltgrass (*Microstegium vimineus*). Soil borings in the wetland reveal a soil matrix color of 10YR 5/1, with mottles 7.5YR 5/6, when compared to the Munsell soil color charts. Texture of the soil is a gravelly silt loam. Hydrologic indicators include saturated soils, a high groundwater table, and drainage patterns. The Cowardin classification of this wetland is PFO6C - palustrine, forested, deciduous, seasonal water regime.

System C includes two small forested wetland areas south of Diamond Jim Road, on a terrace upslope and east of Mill Creek. Dominant vegetation in these wetlands includes American hornbeam (*Carpinus caroliniana*), spicebush (*Lindera benzoin*), multiflora rose (*Rosa multiflora*), and lady fern (*Athyrium filix-femina*). Soil borings in the wetland reveal a soil matrix color of 10YR 5/1, with mottles 7.5YR 5/6, when compared to the Munsell soil color charts. Texture of the soil is a gravelly silt loam. Hydrologic indicators include oxidized root channels and evidence of previous ponding. The Cowardin classification of this wetland is PFO6A - palustrine, forested, deciduous, temporary water regime.

System D/G includes the section of Mill Creek downstream of the box culvert, on the south side of Diamond Jim Road. There are no adjacent wetlands along this portion of the stream within the study area. A concrete cylinder pump is present within the stream at this location. The Cowardin classification of Mill Creek is R3UB1 - riverine, upper perennial, unconsolidated bottom, cobble/gravel.

System E is a forested wetland depression located on the north side of Diamond Jim Road, east of Mill Creek. Dominant vegetation in this wetland includes black gum (*Nyssa sylvatica*), American hornbeam, and stout woodreed (*Cinna arundinacea*). Soil borings in the wetland reveal a soil matrix color of 10YR 6/2, with mottles 7.5YR 5/8, when compared to the Munsell soil color charts. Texture of the soil is a silt loam. Hydrologic indicators include oxidized root channels, drainage patterns, and a geographic depression. The wetland drains to Mill Creek however there is not a direct regulatory connection between the wetland and the stream. The Cowardin classification of this wetland is PFO6C - palustrine, forested, deciduous, seasonal water regime.

System F is the eastern stream bank of Mill Creek north of Diamond Jim Road. There are no adjacent wetlands, except System E, along this portion of the stream within the study area.

System H includes the west bank of Mill Creek north of Diamond Jim Road and a backwater seep wetland which drains to the stream. The wetland was somewhat sparsely vegetated at the time of my site investigation. Dominant vegetation included red maple, American hornbeam, stout woodreed, and halberd-leaved tearthumb (*Polygonum arifolium*). Soil borings in the wetland reveal a soil matrix color of 2.5Y 5/2, with mottles 7.5YR 5/6, when compared to the Munsell soil color charts. Texture of the soil is a silt loam. Hydrologic indicators include saturated soils, a high groundwater table, surface seepage, and drainage patterns. The Cowardin classification of this wetland is PFO6E-F - palustrine, forested, deciduous, seasonally saturated to semi-permanent water regime.

System I consists of a small wetland pocket which drains to an upland swale on the north side of Manor Road, south of the proposed Diamond Jim Road alignment. Dominant vegetation in this wetland includes red maple, American hornbeam, greenbrier, Japanese stiltgrass, many-flowered bulrush (*Scirpus polyphyllus*), and lady fern. Soil borings in the wetland reveal a soil matrix color of 10YR 6/2, with mottles 10YR 5/6, when compared to the Munsell soil color charts. Texture of the soil is a silt loam. Hydrologic indicators include oxidized root channels, drainage patterns, and saturated soils. The Cowardin classification of this wetland is PFO6/EM2C - palustrine, forested, deciduous/emergent, non-persistent, seasonal water regime.

System J includes an extensive forested wetland located on the west side of MD Route 275, south of Diamond Jim Road, along the southern portion of the study area. Dominant vegetation in this wetland includes red maple, American hornbeam, sweetbay magnolia (*Magnolia virginiana*), highbush blueberry (*Vaccinium corymbosum*), spicebush (*Lindera benzoin*), winterberry, greenbrier, skunkcabbage (*Symplocarpus foetidus*), and cinnamon fern (*Osmunda cinnamomea*). Soil borings in the wetland reveal a soil matrix color of 10YR 6/1, with mottles 10YR 6/6, when compared to the Munsell soil color charts. Texture of the soil is a gravelly silt loam. Hydrologic indicators include saturated soils, groundwater seepage, and drainage patterns. The Cowardin classification of this wetland complex is PFO6C-F - palustrine, forested , deciduous, seasonal to semi-permanent water regime.

System K is located on the far northeastern portion of the study area, on the west side of MD Route 275, north of Diamond Jim Road. Dominant vegetation in this wetland includes red maple, sweetbay magnolia, winterberry, greenbrier, and cinnamon fern. Soil and hydrologic indicators are similar to System J. The Cowardin classification of this wetland is PFO6E-F - palustrine, forested, deciduous, seasonally saturated to semi-permanent water regime.

The Natural Resources Conservation Service (NRCS) *Web Soil Survey of Cecil County, Maryland* indicates that soil within the road improvement study area include Aura gravelly sandy loam, 10-15 percent slopes (AuD); Brinklow channery loam, 15-25 percent slopes (BkD); Butlertown silt loam, 5-10 percent slopes (BuC); Chillum loam, 5-10 percent slopes (CaC); Chillum

silt loam, 5-10 percent slopes (CbC); Codorus silt loam, 0-3 percent slopes, occasionally flooded (Ch); Hatboro-Codorus complex, 0-3 percent slopes, flooded (Hw); Sassafras gravelly loam, 10-15 percent slopes (SgD); Sassafras-Croom complex, 15-25 percent slopes (SME); and Woodstown loam, 2-5 percent slopes, Northern Coastal Plain (WoaB). Aura soils are well drained soils on uplands of the Coastal Plain. A fragipan is present at 15-40 inches below the soil surface but does not limit these soils for nonfarm uses. Brinklow soils are well drained soils on hillslopes of the Piedmont Plateau. The presence of bedrock at a depth of 20-40 inches below the soil surface somewhat limit these soils for nonfarm uses. Butlertown soils are moderately well drained soils on hillslopes and broad interstream divides on the Coastal Plain. A seasonally perched water table at a depth of 20-40 inches below the soil surface (above a fragipan) somewhat limit these soils for nonfarm uses. Chillum soils are well drained, gravelly soils of the Coastal Plain. These soils are suitable for most uses, except where limited by slopes. Codorus soils are moderately well drained soils of floodplains and stream terraces on the Piedmont Plateau. The threat of flooding and ponding severely limit these soils for nonfarm uses. Hatboro soils are poorly drained soils of floodplains and stream terraces on the Piedmont Plateau. A high groundwater table to within 0-6 inches of the soil surface and the threat of flooding severely limit these soils for nonfarm uses. Sassafras and Croom soils are well drained soils on uplands of the Coastal Plain. These soils are suitable for most nonfarm uses, except where limited by slope. Woodstown soils are moderately well drained soils of flats on the Coastal Plain. A seasonal high groundwater table to within 20-40 inches of the soil surface slightly limit these soils for nonfarm uses. The Hatboro - Codorus complex, 0-3 percent slopes, is identified as a hydric soil by the NRCS. Butlertown silt loam, 5-10 percent slopes, has the slight potential for hydric Othello inclusions. Woodstown loam, 2-5 percent slopes, Northern Coastal Plain has the slight potential for hydric Fallsington inclusions. Woodstown loam, 2-5 percent slopes, Northern Coastal Plain is identified as Prime Farmland by the NRCS. Butlertown silt loam, 5-10 percent slopes; Chillum loam, 5-10 percent slopes; Chillum silt loam, 5-10 percent slopes; and Codorus silt loam, 0-3 percent slopes, occasionally flooded are identified as Farmland of Statewide Importance by the NRCS.

Topography in the study area is variable, ranging from almost flat to steeply sloping. Slope aspect is variable.

III. Proposed Resource Impacts

Construction of the road improvements for Bainbridge Phase 1A will result in the following resource impacts:

1. **Permanent** impacts to 4,384 square feet of forested nontidal wetlands, 18,008 square feet of 25-foot State nontidal wetlands buffer, 126 linear feet (1,233 square feet) of Use III-P stream channel (Mill Creek and a tributaries to Mill Creek), and 25,259 square feet of associated 100 year floodplain for the following roadwork:

a. Widening of a section of Craigtown Road near the intersection of Diamond Jim Road. Included in this widening work is removal and replacement of an existing stream culvert crossing with a 48-inch culvert pipe;

b. Widening of Diamond Jim Road between MD Route 275 and Craigtown Road. Including in this widening is the extension of 14-foot by 12-foot culvert pipe which carries Mill Creek underneath Diamond Jim Road;

c. Construction of acceleration/deceleration lanes along the MD Route 275 southbound road frontage both to the north and south of the intersection with Diamond Jim Road; and

d. Construction of a new access road (Powers Road) from the intersection of Diamond Jim Road and Craigtown Road into the industrial park.

2. **Temporary** impacts to 962 square feet of forested nontidal wetlands, 18,920 square feet of 25-foot State wetland buffer and 148 linear feet (2,883 square feet) of Use III-P stream channel to allow for installation of sediment control devices; installation of sand bag diversions and stream pump-arounds; re-grading of existing road slopes, and for construction equipment access associated with the required road improvements.

The proposed impacts are depicted in the figures included in Appendix A.

IV. Regulatory Authority

The proposed impacts to nontidal wetlands, perennial stream channels, and intermittent stream channels require authorization from the Maryland Department of the Environment (MDE) and the United States Army Corps of Engineers (USACOE). Authorization from MDE is also required for impacts to the State 25-foot wetland buffer and 100 year floodplain. The following chart outlines the regulatory requirements for this project.

Regulatory Agency Requirements	Project Status
US Army Corps of Engineers Section 404 Permit	MDSPGP-6A.1.e(9) Category B-Residential, Commercial and Institutional Development Activities
MD Department of the Environment Letter of Authorization	qualifies for Permit Authorization.

V. Project Purpose/Need

When the United States Congress authorized the Navy to sell or transfer the property to others on November 3, 1986, it was stated the primary goal was to allow for effective re-use of the property by the State of Maryland and the people of Cecil County. The proposed re-development accomplishes this goal. The logistics centers and shipping hubs to be constructed on the site will provide numerous jobs to the region, significantly enhancing Cecil County's property tax and income tax revenue stream. Re-development of the site will spur secondary development, as new housing, retail businesses, and other services move into the area to support this development. This additional economic activity will further benefit the County.

VI. Alternative Site Design/Avoidance and Minimization

The applicant and project engineer have undertaken a number of measures to minimize impacts to wetlands and streams. The actual development of Phase 1A will not require any resource impacts other than those associated with the road improvements. The section of Powers Road that will be constructed into the site has been designed to almost entirely avoid resource impacts. Impacts are limited to one small wetland pocket. The extent of the road improvements has been limited to the minimal amount needed to satisfy the requirements of the Maryland State Highway Administration and Cecil County. Slope grades along the sections of the roads to be widened have been steepened to the greatest extent practicable to minimize the width of disturbance and extent of resource impacts. The existing culvert crossing underneath Diamond Jim Road will be extended (in lieu of being replaced) to minimize disturbance to the stream channel. A sand bag diversion/stream pump-around system will be incorporated during the crossing replacement along Craigtown Road and during the extension of the culvert underneath Diamond Jim Road to allow the contractor to work "in the dry" to minimize water quality impacts. The replacement culvert underneath Craigtown Road will be depressed one-foot to allow for accumulation of natural streambed material in the culvert and to allow for aquatic species migration. Disturbed areas near resource features will be stabilized at the end of each construction day to reduce the potential for sedimentation in the event of rain. Portions of the wetlands, wetland buffers and stream channels temporarily impacted by installation of sediment control, slope grading and the de-watering device/stream diversion will be returned to pre-construction grades upon completion of construction. Temporarily disturbed wetland areas will be seeded with an appropriate wetland seed mix and planted with a mix of native wetland tree and shrub species. These measures in total will minimize the impacts to regulated resource resulting from the proposed road improvements.

A number of factors prevented further minimization or elimination of wetland, stream, wetland buffer, and floodplain impacts. One primary factor was other government agency requirements. All of the resource impacts identified in this application, with the exception of the minor wetland and wetland buffer impacts associated with the construction of Powers Road, could be avoided if the applicant was not required to make the geometric improvements to MD Route 275, Diamond Jim Road, and Craigtown Road. However the Maryland State Highway Administration and Cecil County Department of Public Works are requiring the applicant to make the various road improvements (road widening, construction of acceleration and deceleration lanes, culvert

replacement) to ensure that the road network can safely handle the increased truck traffic expected to be generated by the industrial park. Another factor preventing further minimization of resource impacts was the location and proximity of wetlands, wetland buffers, streams and floodplains to the existing road network to be improved. Mill Creek crosses underneath Diamond Jim Road. In order to widen the road as required by Cecil County, the existing stream crossing must be extended to accommodate the wider road profile. Additionally, forested wetlands, associated buffers, and a 100 year floodplain are present adjacent to Mill Creek, along the toe of the existing Diamond Jim Road fill slope. There is no way to widen the road without impacting these resources due their locations at the base of the existing road slope.

Similar situations exist along Craigtown Road and southbound MD Route 275. A tributary to Mill Creek currently flows through a culvert underneath Craigtown Road just south of the intersection with Diamond Jim Road. In order to make the road improvements required by the Cecil County, the culvert pipe must be replaced/extended, resulting in stream/wetland impacts. Extensive forested wetlands, tributary stream channels, and portions of the 100 year floodplain associated with Mill Creek are present along the base of the MD Route 275 road slope where the construction of the acceleration and deceleration lanes are proposed. There is no physical way to widen the road profile without some impacts to these resources.

In summary, it is our opinion that resource impacts have been minimized to the greatest extent practicable. The project engineer has steepened the grade slopes in proposed road widening areas to minimize the extent of encroachment into wetlands, floodplains, and buffers. Stream diversions have been incorporated into the design to allow for in-stream work to occur in the dry, minimizing impacts to water quality. As result of these efforts, permanent wetland impacts have been kept to less than 4,500 square feet and permanent stream impacts less than 130 linear feet. Total avoidance or further minimization of resource impacts is not possible since the State Highway Administration and Cecil County will not approve the site development plan if these road improvements are not provided.

VII. Alternative Site Analysis

There are no other sites in the market area which have the attributes of this site. The first attribute is the geographic location of the site. The site is located close to Interstate 95 and is approximately equidistant from the Baltimore/Washington and Philadelphia areas. This allows the site, which is to be developed as an industrial park with large logistics centers and shipping hubs, to service a large market area. Another attribute is the size of the site. The site is the largest contiguous block of industrially-zoned property along the Interstate 95 corridor in Cecil County, consisting of over 1,200 acres. This acreage can support the large industrial buildings, logistic centers, and shipping hubs proposed for the site with minimal impacts to regulated resources. Another attribute of the site is that it was previous developed. The site was used by the United States Navy between 1942-1976 as a training center for recruits. The training center consisted of numerous buildings, outdoor training facilities, and an extensive road network. Following the deactivation of the base by the Navy in 1976, portions of the site were used by the Department of Labor as a Job Corps training center until 1990 at which time the site was closed. Removal of the previous

buildings and old infrastructure plus hazardous materials removal was performed by the Department of the Navy between 1990-2006, Most of the proposed development will occur on portions of the site that were previously developed/impacted by the Navy, with little impact proposed to significant natural habitats. Another advantage of the site is that it is serviced by an excellent transportation network. The site has access to MD Route 275, MD Route 276, and MD Route 222. These roads will allow truck traffic generated by the development easy access to Interstate 95, U.S. Route 40, and U.S. Route 1.

In summary, the site is the only suitable one for the proposed development given the factors discussed above.

VIII. Wetland Mitigation

Wetland mitigation must be provided for all wetland impacts since the wetland to be impacted is located within a Use III watershed. Mitigation for the 4,384 square feet of forested wetland impacts must be provided at a ratio of 2:1, for a wetland mitigation requirement of 8,768 square feet. The applicant proposes to meet this mitigation requirement through purchase of 8,758 square feet of wetland mitigation credit in a State-approved Wetland Mitigation Bank if one is approved in the watershed. Should wetland mitigation bank credit in this watershed not be available at the time of permit approval, the applicant would then propose to address this mitigation requirement through payment into the State Wetland Compensation Fund. It is our opinion that use of a mitigation bank for payment into the State Wetland Compensation Fund for this project is appropriate given the small amount of required mitigation.

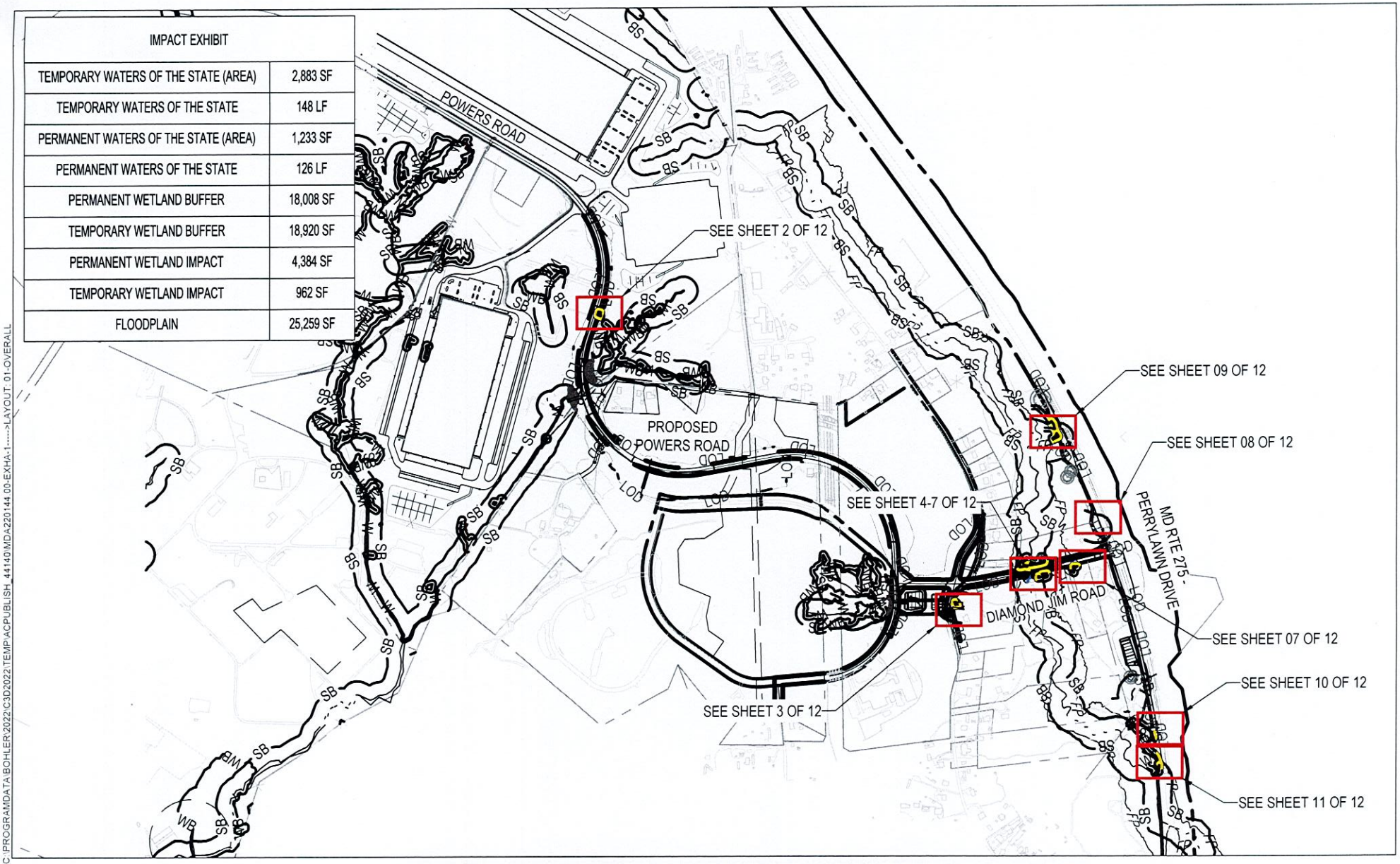
IX. Historic Properties

A review of the Maryland MERLIN Online Map encompassing the site indicates that there are no sites listed on the National Register of Historic Places which occur proximate to the site. A number of sites listed on the Maryland Inventory of Historic Places are proximate to the site. They include BA 1670-1672, 1675-1677 - Reuben Stump Tenant Houses 1-6; BA 1607 - Rai Parr House (Laural); BA 1673 - Greenspring Valley School; BA 1674 - Chenowith House; and BA 2294 - Sevenm Oaks (Jenkins Residence, Faculty House). None of these structures will be impacted by this project (should not be within viewshed).

X. Authorship

This joint permit application has been prepared by Mr. Henry Leskinen of Eco-Science Professionals, Inc. of Glen Arm, Maryland. The road improvement plans for the project have been prepared by Bohler Engineering, a civil engineering and land planning firm based in Towson, Maryland.

IMPACT EXHIBIT	
TEMPORARY WATERS OF THE STATE (AREA)	2,883 SF
TEMPORARY WATERS OF THE STATE	148 LF
PERMANENT WATERS OF THE STATE (AREA)	1,233 SF
PERMANENT WATERS OF THE STATE	126 LF
PERMANENT WETLAND BUFFER	18,008 SF
TEMPORARY WETLAND BUFFER	18,920 SF
PERMANENT WETLAND IMPACT	4,384 SF
TEMPORARY WETLAND IMPACT	962 SF
FLOODPLAIN	25,259 SF



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OVERALL SITE EXHIBIT - SHEET 1 OF 12

BOHLER //

901 DULANEY VALLEY ROAD, SUITE 801
TOWSON, MARYLAND 21204
Phone: (410) 821-7900
Fax: (410) 821-7987
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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION
TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

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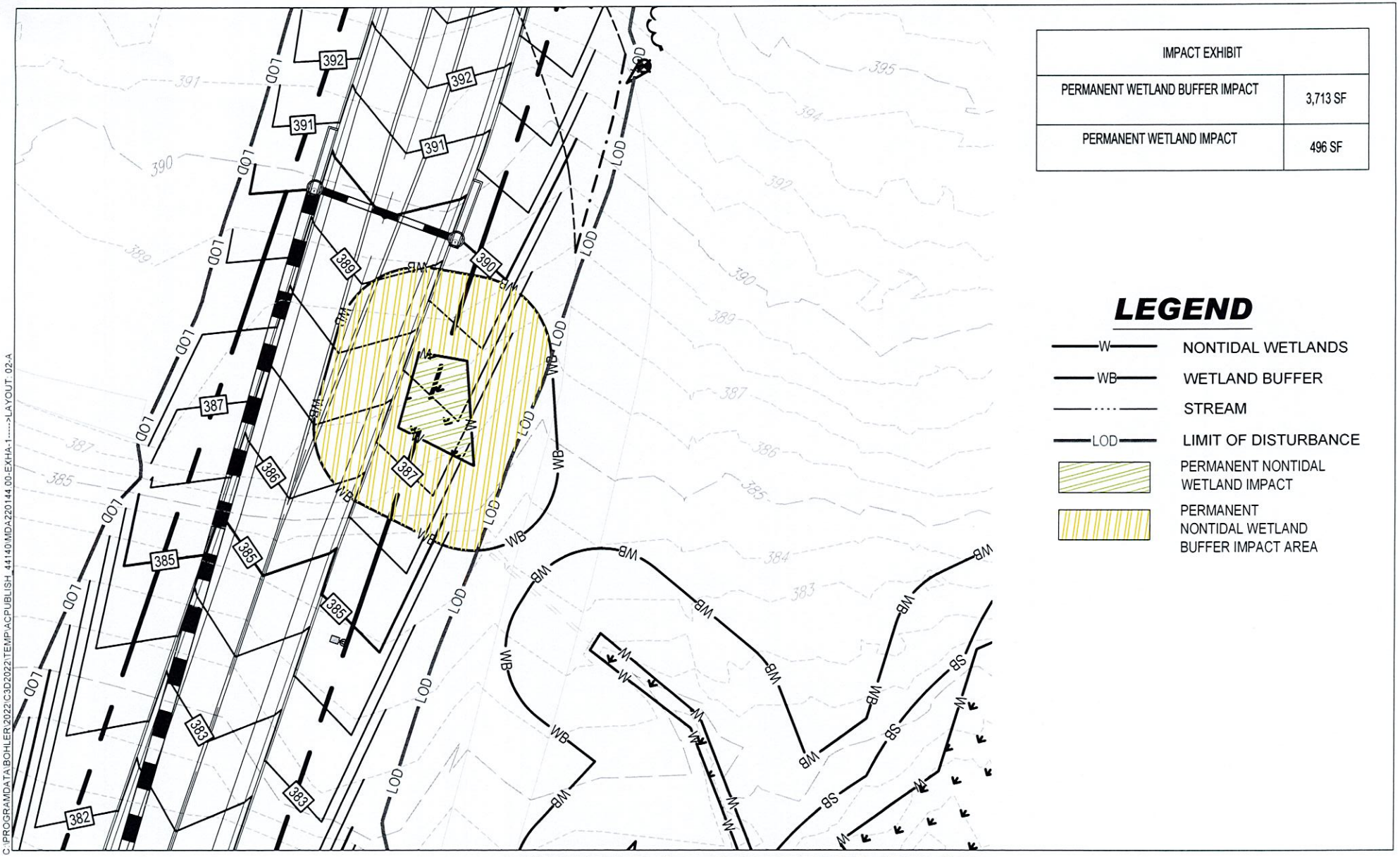

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EXHIBIT A - SHEET 02 OF 12

BOHLER

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

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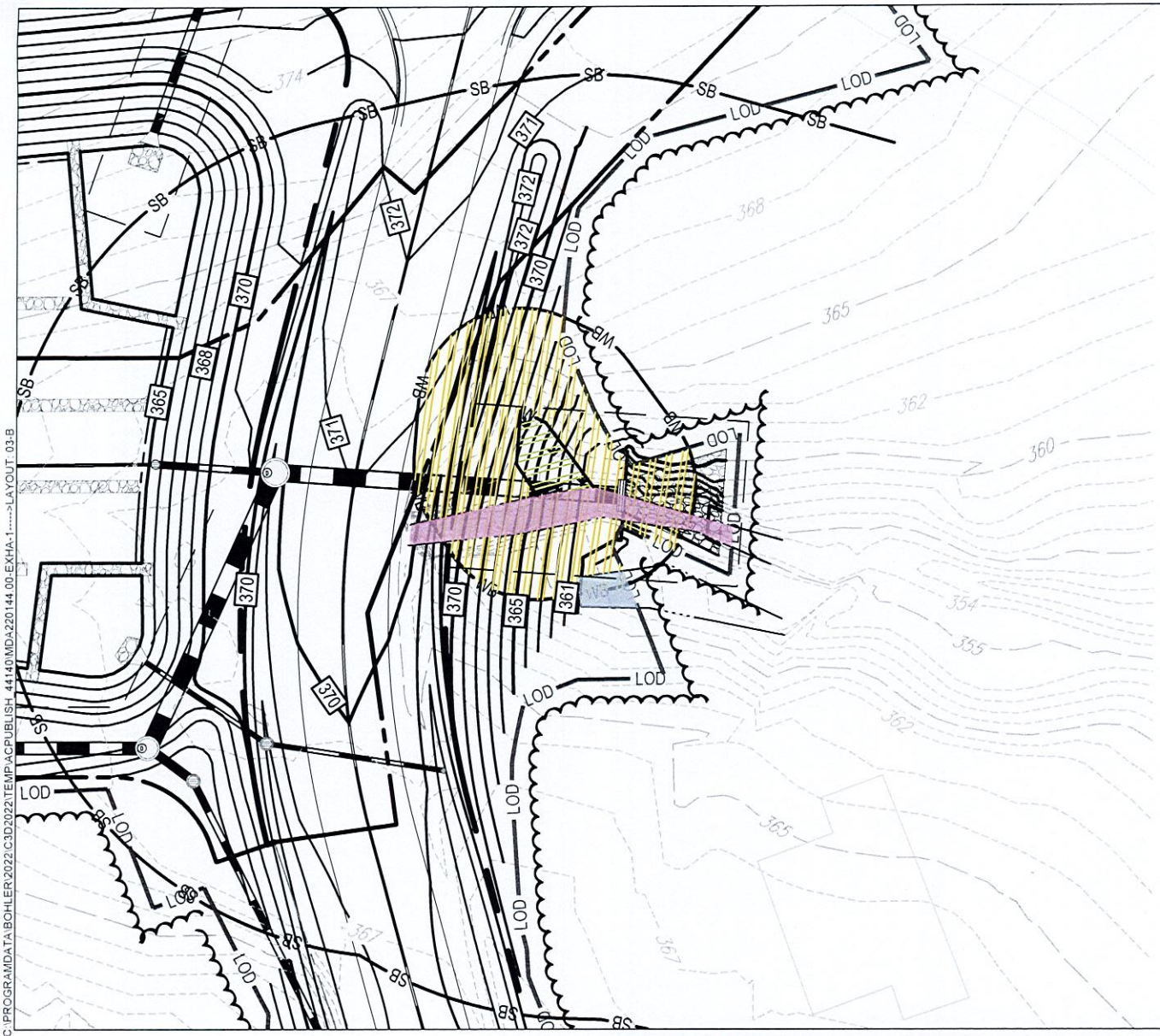

IMPACT EXHIBIT	
TEMPORARY WATERS OF THE STATE (AREA)	101 SF
TEMPORARY WATERS OF THE STATE	13 LF
PERMANENT WATERS OF THE STATE (AREA)	492 SF
PERMANENT WATERS OF THE STATE	80 LF
PERMANENT WETLAND BUFFER	2,934 SF
PERMANENT WETLAND IMPACT	1,002 SF

LEGEND

- W — NONTIDAL WETLANDS
- WB — WETLAND BUFFER
- STREAM
- LOD — LIMIT OF DISTURBANCE
- PERMANENT WATERS OF THE STATE IMPACT
- TEMPORARY WATERS OF THE STATE IMPACT
- PERMANENT NONTIDAL WETLAND IMPACT
- PERMANENT NONTIDAL WETLAND BUFFER IMPACT AREA

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EXHIBIT B - SHEET 03 OF 12

BOHLER //

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

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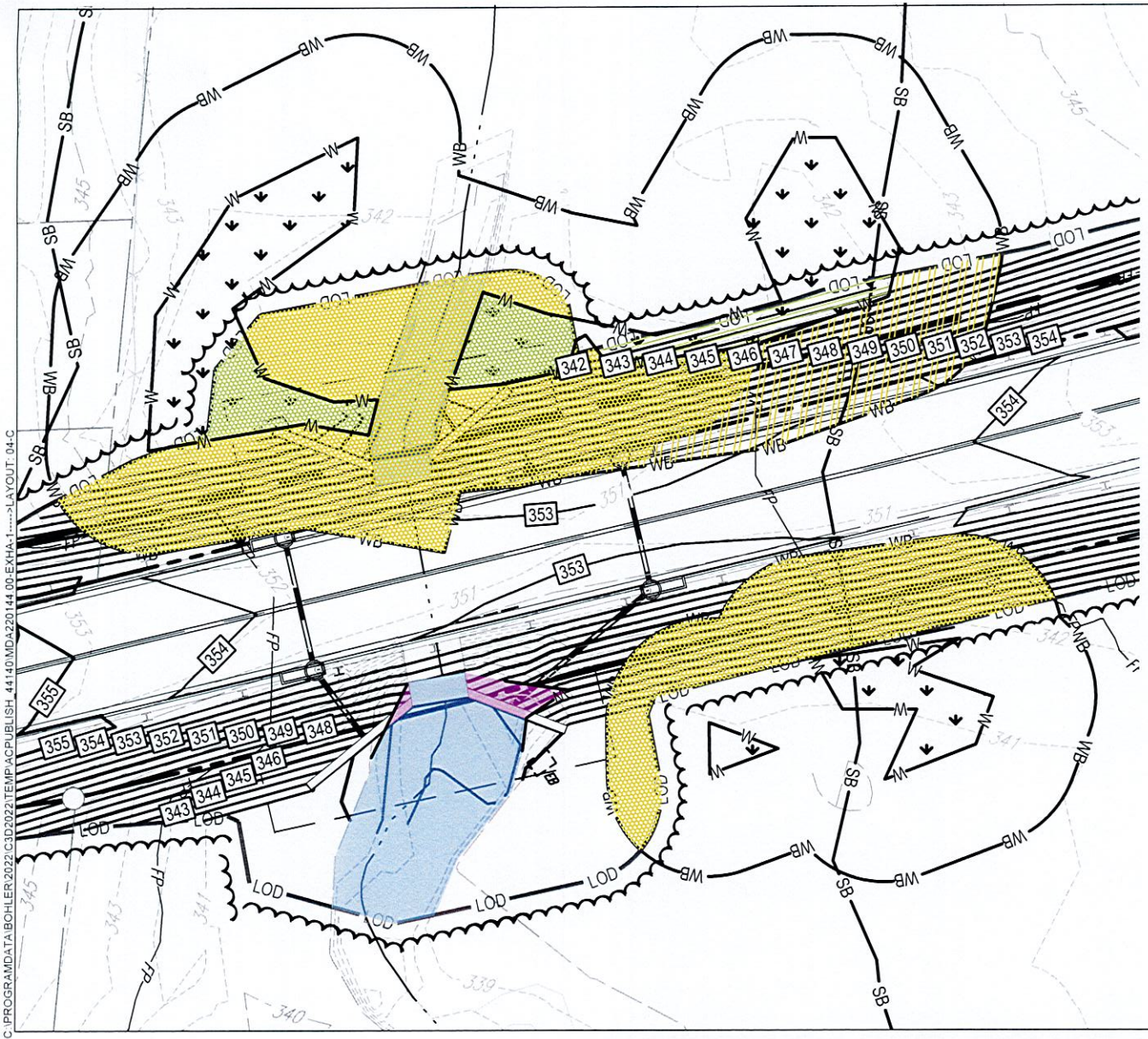

IMPACT EXHIBIT	
TEMPORARY WATERS OF THE STATE (AREA)	2,552 SF
TEMPORARY WATERS OF THE STATE	108 LF
PERMANENT WATERS OF THE STATE (AREA)	165 SF
PERMANENT WATERS OF THE STATE	0 LF
PERMANENT WETLAND BUFFER	1,804 SF
TEMPORARY WETLAND BUFFER	7,869 SF
PERMANENT WETLAND IMPACT	468 SF
TEMPORARY WETLAND IMPACT	962 SF

LEGEND

- W — NONTIDAL WETLANDS
- WB — WETLAND BUFFER
- STREAM
- LOD — LIMIT OF DISTURBANCE
- PERMANENT WATERS OF THE STATE IMPACT
- TEMPORARY WATERS OF THE STATE IMPACT
- PERMANENT NONTIDAL WETLAND IMPACT
- PERMANENT NONTIDAL WETLAND BUFFER IMPACT AREA
- TEMPORARY WETLAND BUFFER IMPACT AREA
- TEMPORARY NONTIDAL WETLAND IMPACTED AREA

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EXHIBIT C - SHEET 04 OF 12

BOHLER //

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

N

40 20 10 0 40

1"= 40'

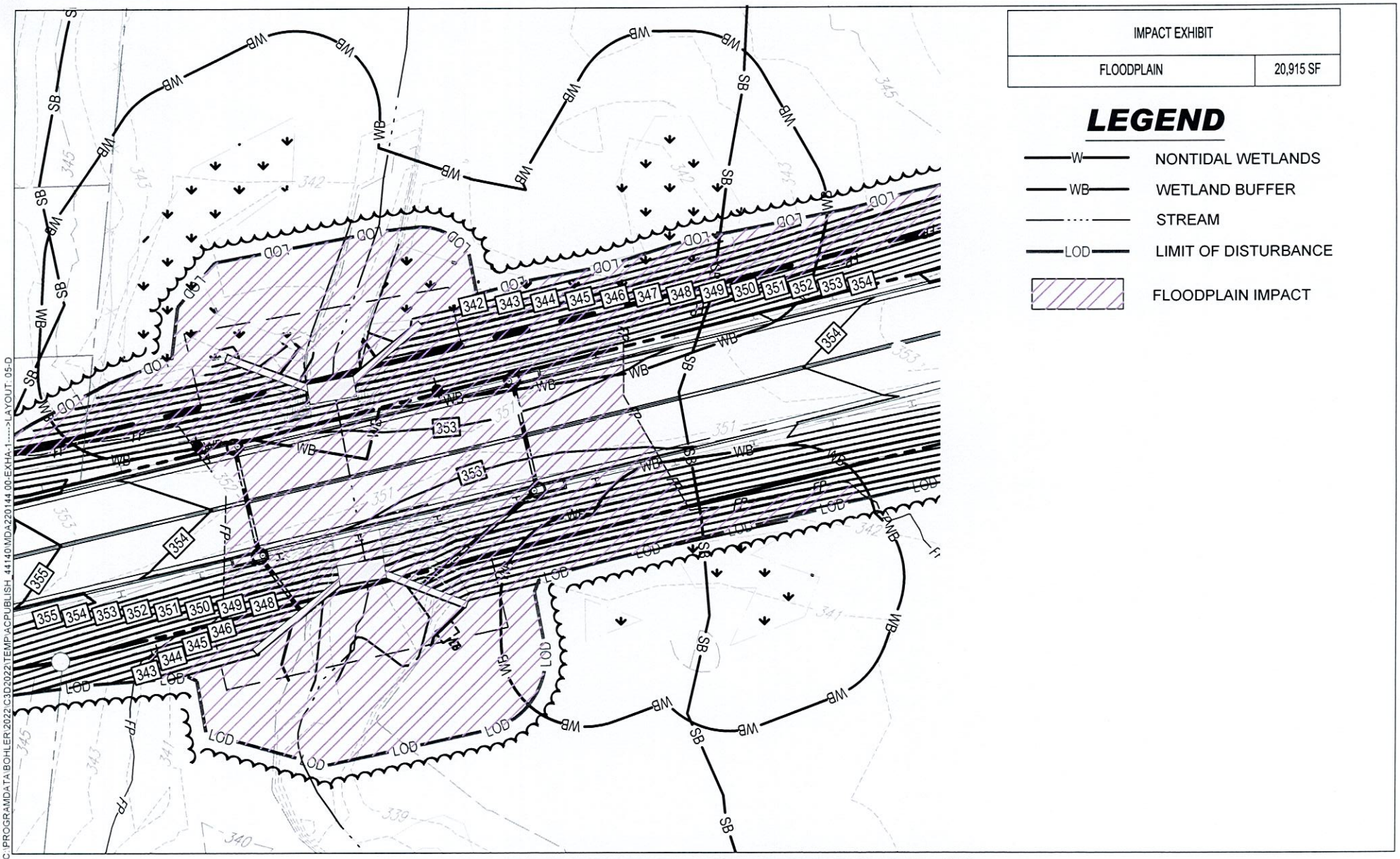

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EXHIBIT D - SHEET 05 OF 12

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

40 20 10 0 40
1"= 40'

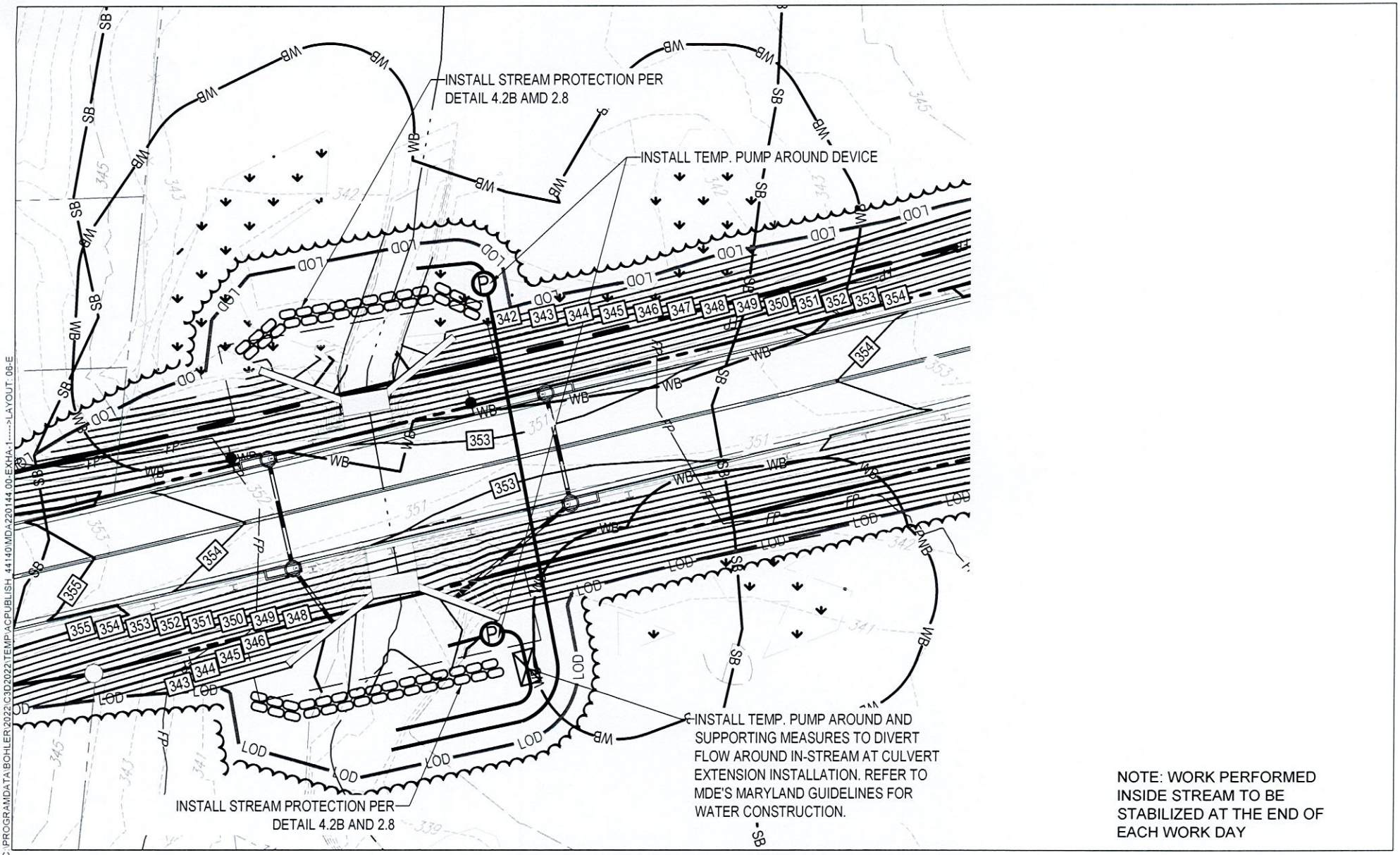

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EXHIBIT E - SHEET 06 OF 12

BOHLER //

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

40 20 10 0 40

1"= 40'

SEQUENCE OF CONSTRUCTION CULVERT:

		TIME
1.	NO IN-STREAM WORK SHALL TAKE PLACE BETWEEN OCTOBER 1 AND APRIL 30 OF ANY YEAR. NOTIFY CECIL COUNTY'S SEDIMENT CONTROL INSPECTOR AT 410-996-5235 AT LEAST 48 HOURS PRIOR TO THE START OF CONSTRUCTION.	1 DAY
2.	THE GENERAL CONTRACTOR SHALL NOT COMMENCE ANY LAND DISTURBING ACTIVITIES PRIOR TO OBTAINING A GRADING PERMIT.	1 DAY
3.	THE CONTRACTOR SHALL HOLD A PRE-CONSTRUCTION MEETING WITH THE CONSTRUCTION MANAGER AND THE CECIL COUNTY SEDIMENT CONTROL INSPECTOR PRIOR TO COMMENCING ANY LAND DISTURBING ACTIVITIES.	1 DAY
4.	ALL AREAS WHICH ARE TO BE DISTURBED SHALL BE CLEARLY MARKED IN THE FIELD PRIOR TO CONSTRUCTION. DISTURBED AREAS WITHIN THE SITE WHERE CONSTRUCTION ACTIVITY HAS CEASED SHALL BE PERMANENTLY OR TEMPORARILY STABILIZED WITHIN: a. THREE (3) CALENDAR DAYS ON SLOPES GREATER THAN 3:1, ALL WATERWAYS AND TO THE SURFACE OF ALL PERIMETER CONTROLS. b. SEVEN (7) CALENDAR DAYS ON ALL OTHER DISTURBED OR GRADED AREAS OF THE PROJECT.	2 DAYS
5.	INSTALL PERIMETER SUPER SILT FENCE AS SHOWN ON THE SEDIMENT CONTROL PLANS.	3 DAYS
6.	INSTALL PUMP AROUND PRACTICE AS SHOWN ON THE SEDIMENT CONTROL PLANS.	2 DAYS
7.	BEGIN STREAM RESTORATION. CONTRACTOR TO ROUGH GRADE STREAM CHANNEL.	1 WEEK
8.	BEGIN INSTALLATION RETAINING WALLS AND CONCRETE BOX CULVERT (REFER TO STRUCTURAL DESIGN PLANS).	1 WEEK
9.	FINALIZE STREAM RESTORATION. UTILIZE JUTE MATTING FOR SOIL STABILIZATION. SEE STREAM RESTORATION AREA PLANTING SCHEDULE AND PLANT DETAIL FOR PROPOSED CHANNEL.	1 WEEK
10.	INSTALL PROPOSED ROAD BASE COURSE AS SHOWN ON THE ROAD PLANS.	4 WEEKS
11.	AS THE SITE IS BROUGHT TO FINAL GRADE, PERMANENTLY STABILIZE ALL DISTURBED AREAS WITHIN SEVEN (7) CALENDAR DAYS.	8 WEEKS
12.	INSTALL PERMANENT LANDSCAPING AROUND THE STREAM AND CULVERT AREAS. NATIVE WOODY VEGETATION SHALL BE INSTALLED.	1 WEEK
13.	AFTER ALL CONSTRUCTIONS HAS BEEN COMPLETED AND UPON APPROVAL FROM THE CECIL COUNTY SEDIMENT CONTROL INSPECTOR REMOVE SEDIMENT CONTROL MEASURES.	1 WEEK
14.	NOTIFY CECIL COUNTY DIVISION OF PERMITS AND INSPECTIONS FOR FINAL INSPECTION OF THE COMPLETED PROJECT.	3 DAYS

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EXHIBIT F - SHEET 07 OF 12

BOHLER //
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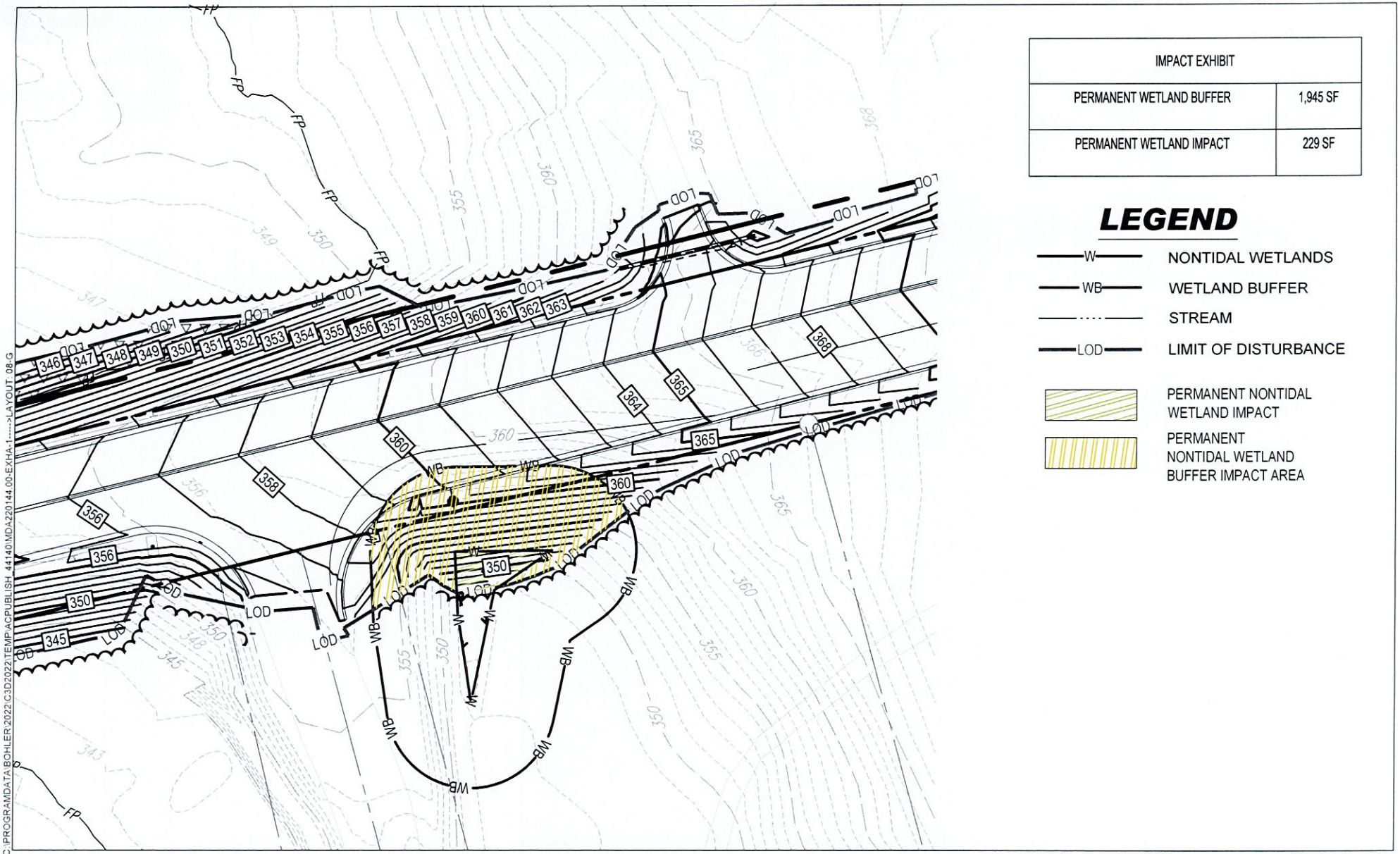
IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

1"= 40'



IMPACT EXHIBIT	
PERMANENT WETLAND BUFFER	1,945 SF
PERMANENT WETLAND IMPACT	229 SF

LEGEND

- W — NONTIDAL WETLANDS
- WB — WETLAND BUFFER
- STREAM
- LOD — LIMIT OF DISTURBANCE
- PERMANENT NONTIDAL WETLAND IMPACT
- PERMANENT NONTIDAL WETLAND BUFFER IMPACT AREA

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EXHIBIT G - SHEET 8 OF 12

BOHLER

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

N

40 20 10 0 40

1"= 40'

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EXHIBIT H - SHEET 09 OF 12

BOHLER

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

N

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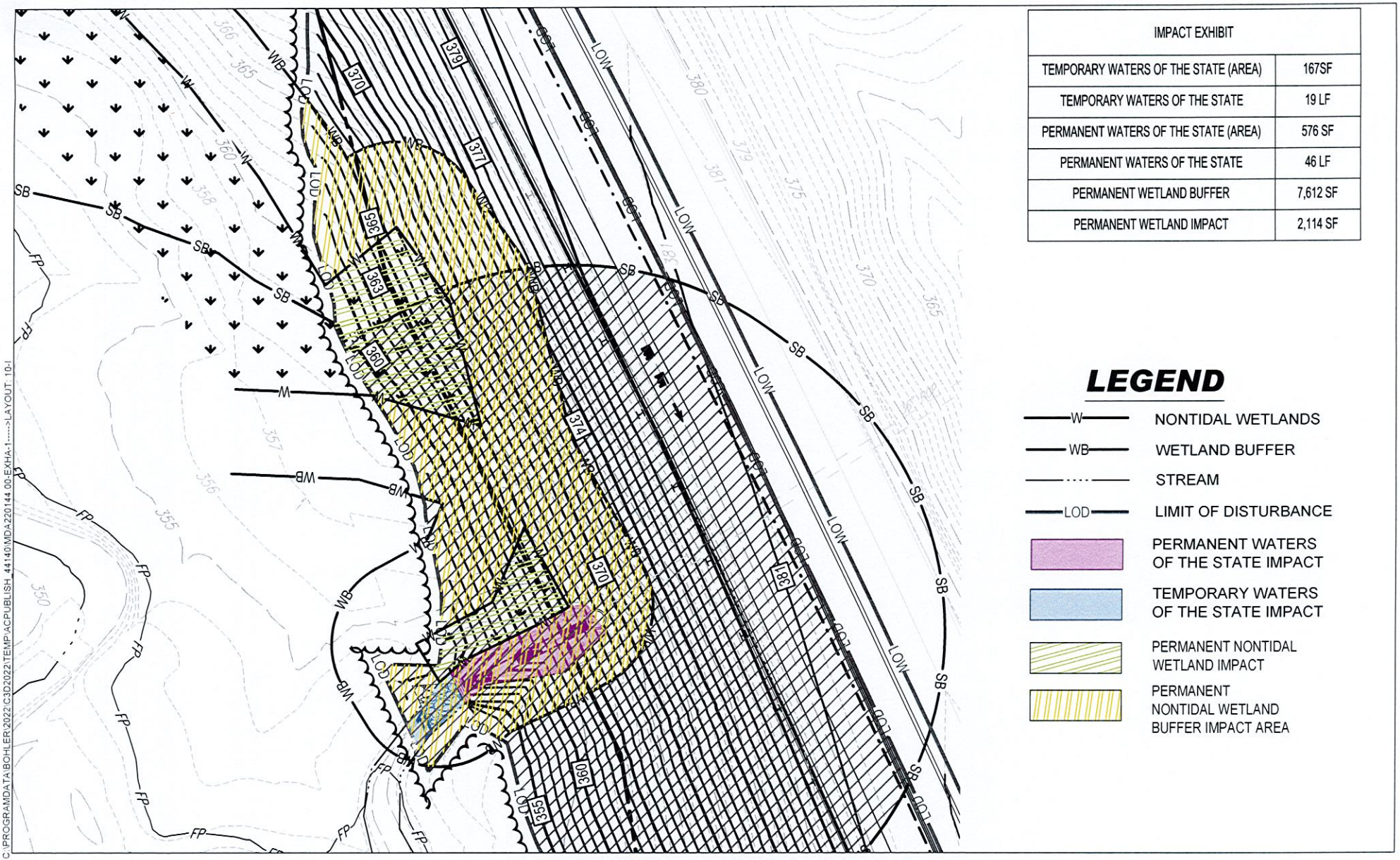
1"= 40'



IMPACT EXHIBIT	
TEMPORARY WATERS OF THE STATE (AREA)	167SF
TEMPORARY WATERS OF THE STATE	19 LF
PERMANENT WATERS OF THE STATE (AREA)	576 SF
PERMANENT WATERS OF THE STATE	46 LF
PERMANENT WETLAND BUFFER	7,612 SF
PERMANENT WETLAND IMPACT	2,114 SF

LEGEND

- W — NONTIDAL WETLANDS
- WB — WETLAND BUFFER
- STREAM
- LOD — LIMIT OF DISTURBANCE
- PERMANENT WATERS OF THE STATE IMPACT
- TEMPORARY WATERS OF THE STATE IMPACT
- PERMANENT NONTIDAL WETLAND IMPACT
- PERMANENT NONTIDAL WETLAND BUFFER IMPACT AREA

EXHIBIT I - SHEET 10 OF 12

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

N

40 20 10 0 40

1"= 40'

EXHIBIT J - SHEET 11 OF 12

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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

N

40 20 10 0 40

1"= 40'

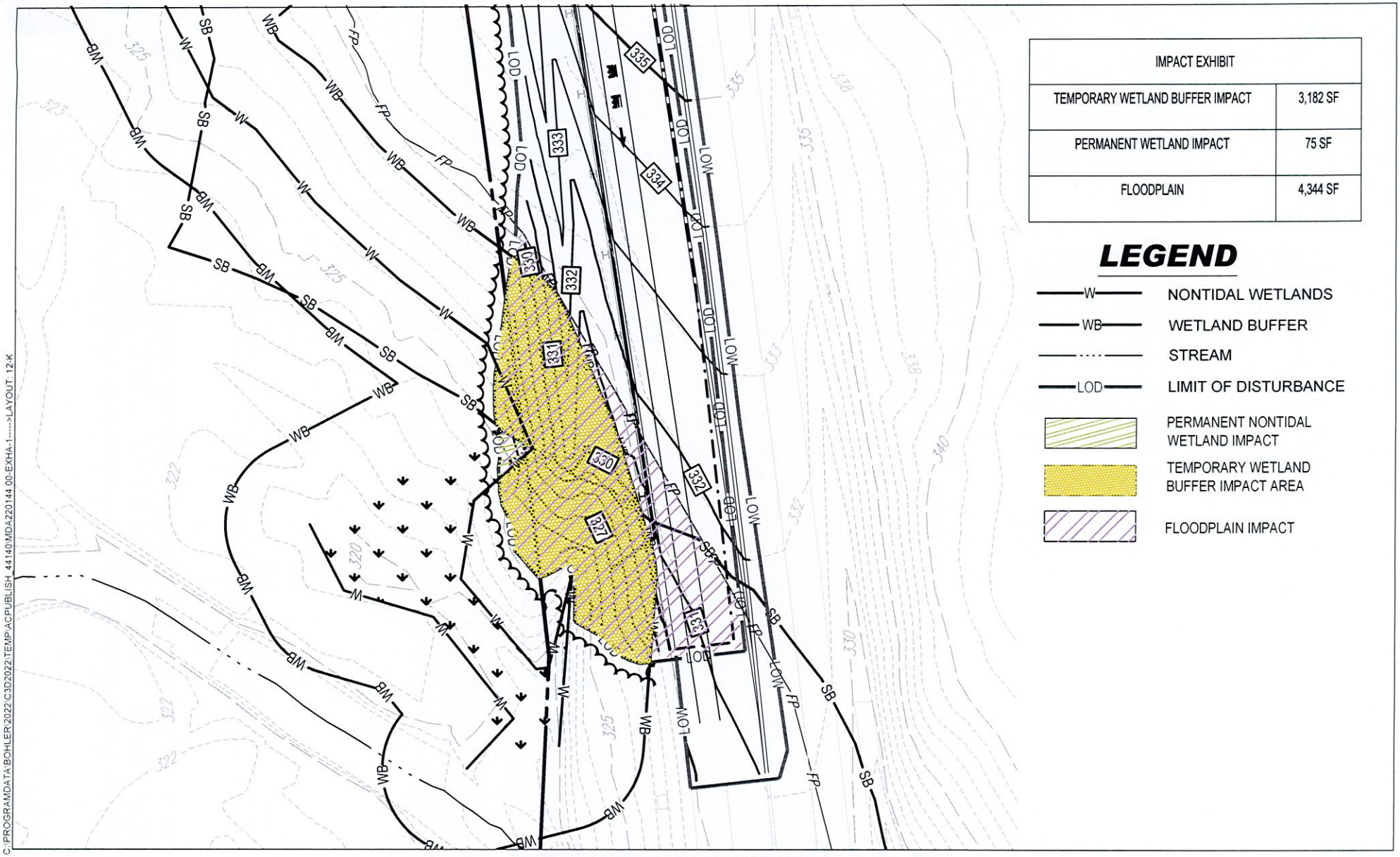

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EXHIBIT K - SHEET 12 OF 12

BOHLER
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IMPACT PLATES

BAINBRIDGE PHASE 1A -
POWERS ROAD EXTENSION

TOWN OF PORT DEPOSIT, MD

08/07/24 | MCO | MDA220144.00 | REV. 1

N

40 20 10 0 40

1"= 40'