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Savannah, GA 31404

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Terracon.com

April 9, 2025

Land Equity Partners, Inc.
3997 Commons Drive, W Suite F
Destin, FL 32541

Attn: Mr. Edwin Stanford
E: ed@coreconsulting.com

Re: Edmund Ave Client Verification
Kingsland, Camden County, GA
Client Verification Letter
Terracon Project No. ES247348
SAS-2025-00090

Dear Mr. Stanford

Attached is a copy of the U.S. Army Corps of Engineers (USACE) letter, dated 7 April 2025, regarding the Approved Jurisdictional Determination (AJD) and Aquatic Resource Delineation Review (ADRR) associated with the ±21.37-acre site located north of East Edmund Avenue and south of Caney Place in Kingsland, Camden County, Georgia. The project has been assigned the regulatory branch number of **SAS-2025-00090**.

It is important that you use this number in any communication with the USACE concerning this project. The attached USACE letter states that the exhibit entitled, "Aquatic Resource Delineation Exhibit", dated January 2025 accurately identify the delineated limits of all aquatic resources located within the review area.

Wetland A as depicted in the above-mentioned exhibit are waters of the United States, and therefore are within the jurisdiction of Section 404 of the Clean Water Act (CWA). Any placement of fill or mechanized land clearing of these wetlands will require a Department of the Army Permit prior to beginning work. The delineation associated with these wetlands does not have a set expiration date and will remain valid until the USACE exercises its discretion to review the delineation at a future time.

Conversely, Wetland B and Wetland C are not waters of the United States, and therefore, are not within the jurisdiction of Section 404 of the CWA. Since these aquatic resources are not regulated under the CWA, a Department of the Army Permit would not be required prior to the placement of fill or mechanized land clearing of these features. The Approved Jurisdictional Determination associated with these aquatic features will remain valid for a period of 5 years, **expiring 7 April 2030**, unless new information warrants revision prior to that date.

Should you have any questions regarding this information, please do not hesitate to contact us. As always, Terracon Consultants, Inc. thanks you for the opportunity to assist you with this project.

Sincerely,
Terracon Consultants, Inc.

A handwritten signature in black ink, appearing to read 'Chandler Pharr'.

Chandler Pharr
Senior Staff Scientist

A handwritten signature in blue ink, appearing to read 'Kristen Deason'.

Kristen Deason
Group Manager

A handwritten signature in blue ink, appearing to read 'Mike DeMell'.

Mike DeMell
Principal, Department Manager II

Attachments: **U.S. Army Corps of Engineers Verification Letter, Dated April 7, 2025**

KD/cp
N/Projects/ES247348/ARDR AJD Client Ver. Letter
April 2025



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT
100 W. OGLETHORPE AVENUE
SAVANNAH, GEORGIA 31401-3604

April 7, 2025

Regulatory Division
SAS-2025-00090

Edwin Stanford
Land Equity Partners, Inc.
3997 Commons Drive, W Suite F
Destin, FL 32541

Dear Edwin Stanford:

I refer to a letter dated January 29, 2025, submitted on your behalf by Chandler Pharr of Terracon Consultants, Inc. (Terracon), requesting an Aquatic Resources Delineation Review (ARDR) and Approved Jurisdictional Determination (AJD) for a 21.37-acre site located north of East Edmund Avenue and south of Caney Place in Kingsland, Camden County, Georgia (Latitude 30.8071797, Longitude -81.679455). This project has been assigned number SAS-2025-00090 and it is important that you refer to this number in all communication concerning this matter.

We have completed an ARDR and AJD for this site. Any wetlands on-site were delineated in accordance with criteria contained in the 1987 "Corps of Engineers Wetland Delineation Manual," as amended by the most recent regional supplements to the manual. I have enclosed an "AJD Memorandum for Record," which details whether aquatic resources present on the site are subject to the jurisdiction of the U.S. Army Corps of Engineers and how the Corps determined jurisdiction

"Wetland B" and "Wetland C" as depicted on the enclosed exhibit entitled, "Aquatic Resource Delineation Exhibit", dated January 2025, are not waters of the United States and are therefore not within the jurisdiction of Section 404 of the Clean Water Act (33 United States Code § 1344). The placement of dredged or fill material into non-jurisdictional waters would not require prior Department of the Army authorization pursuant to Section 404. The above referenced exhibit also identifies the delineation limits of all other aquatic resources within the review area.

This AJD will remain valid for a period of 5-years unless new information warrants revision prior to that date. You may request an administrative appeal for any approved JD under the Corps regulations at 33 Code of Federal Regulations (CFR) Part 331. Enclosed you will find a Notification of Administrative Appeal Options and Process and Request for Appeal form.

The delineation included herein has been conducted to identify the location and extent of the aquatic resource boundaries and/or the jurisdictional status of aquatic resources for purposes of the Clean Water Act for the particular site identified in this request. This delineation and/or jurisdictional determination may not be valid for the Wetland Conservation Provisions of the Food Security Act of 1985, as amended. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should discuss the applicability of a certified wetland determination with the local USDA service center, prior to starting work.

If you intend to sell property that is part of a project that requires Department of the Army Authorization, it may be subject to the Interstate Land Sales Full Disclosure Act. The Property Report required by Housing and Urban Development Regulation must state whether, or not a permit for the development has been applied for, issued or denied by the U.S. Army Corps of Engineers (Part 320.3(h) of Title 33 of the CFR).

This communication does not convey any property rights, either in real estate or material, or any exclusive privileges. It does not authorize any injury to property, invasion of rights, or any infringement of federal, state or local laws, or regulations. It does not obviate your requirement to obtain state or local assent required by law for the development of this property. If the information you have submitted, and on which the U.S. Army Corps of Engineers has based its determination is later found to be in error, this decision may be revoked.

Thank you in advance for completing our on-line Customer Survey Form located at <https://regulatory.ops.usace.army.mil/customer-service-survey/>. We value your comments and appreciate your taking the time to complete a survey each time you have interaction with our office.

If you have any questions, please contact Hayden Casey by email at h.c.casey@usace.army.mil.

Sincerely,
CASEY.HAYDEN.CH
RISTOPHER.106224
3712
Hayden Casey, Regulatory Specialist
Coastal Branch

Digitally signed by
CASEY.HAYDEN.CHristopher.1
062243712
Date: 2025.04.07 08:45:07 -04'00'

Copy Furnished: Chandler Pharr, Terracon Consultants, Inc.

Enclosures

**NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS
AND REQUEST FOR APPEAL**

Applicant: Edwin Stanford		File Number: SAS-2025-00090	Date: April 4, 2025
Attached is:		See Section below	
<input type="checkbox"/>	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)		A
<input type="checkbox"/>	PROFFERED PERMIT (Standard Permit or Letter of permission)		B
<input type="checkbox"/>	PERMIT DENIAL		C
<input checked="" type="checkbox"/>	APPROVED JURISDICTIONAL DETERMINATION		D
<input type="checkbox"/>	PRELIMINARY JURISDICTIONAL DETERMINATION		E

SECTION I - The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at http://www.usace.army.mil/CECW/Pages/reg_materials.aspx or Corps regulations at 33 CFR Part 331.

A: INITIAL PROFFERED PERMIT: You may accept or object to the permit.

ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.

OBJECT: If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

B: PROFFERED PERMIT: You may accept or appeal the permit.

ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.

APPEAL: If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

C: PERMIT DENIAL: You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

D: APPROVED JURISDICTIONAL DETERMINATION: You may accept or appeal the approved JD or provide new information.

ACCEPT: You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.

APPEAL: If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. The division engineer must receive this form within 60 days of the date of this notice.

E: PRELIMINARY JURISDICTIONAL DETERMINATION: You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also you may provide new information for further consideration by the Corps to reevaluate the JD.

SECTION II - REQUEST FOR APPEAL or OBJECTIONS TO AN INITIAL PROFFERED PERMIT

REASONS FOR APPEAL OR OBJECTIONS: (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

ADDITIONAL INFORMATION: The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

POINT OF CONTACT FOR QUESTIONS OR INFORMATION:

If you have questions regarding this decision and/or the appeal process you may contact:
Hayden Casey
U.S. Army Corps of Engineers, Savannah District
100 W. Oglethorpe Avenue, Savannah, Georgia 31401

Email: hayden.c.casey@usace.army.mil

If you only have questions regarding the appeal process you may also contact:

Krista Sabin
Administrative Appeal Review Officer
CESAS-PDS-O
60 Forsyth Street Southwest, Floor M9
Atlanta, Georgia 30303-8803

Phone: (904) 314-9631

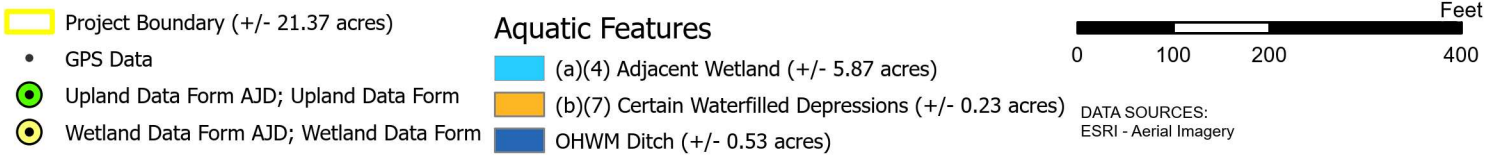
Email: krista.d.sabin@usace.army.mil

RIGHT OF ENTRY: Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15-day notice of any site investigation, and will have the opportunity to participate in all site investigations.

Signature of appellant or agent.

Date:

Telephone number:



Project No.:	ES247348
Date:	Jan 2025
Drawn By:	CP
Reviewed By:	KHD



2201 Rowland Avenue Savannah, GA
terracon.com

Aquatic Resource Delineation Exhibit
Edmund Avenue Parcel Land Equity Partners Inc

Exhibit
7

**Edmund Avenue Parcel
Sub-Meter GPS Data**

January 2025

Flag #	Lat.	Long.
Ka1	30.807257	-81.681635
Ka10	30.807261	-81.681157
Ka10	30.80733	-81.681126
Ka11	30.807245	-81.681057
Ka12	30.807123	-81.680904
Ka13	30.807025	-81.680815
Ka14	30.806981	-81.680692
Ka15	30.806991	-81.680563
Ka16	30.807013	-81.680429
Ka17	30.80701	-81.680342
Ka18	30.806975	-81.680316
Ka19	30.807006	-81.680187
Ka2	30.807273	-81.681555
Ka20	30.807101	-81.680178
Ka21	30.807067	-81.680263
Ka22	30.807056	-81.680338
Ka23	30.807022	-81.680374
Ka24	30.807038	-81.680483
Ka25	30.807085	-81.680517
Ka26	30.807169	-81.680544
Ka27	30.807221	-81.680597
Ka28	30.807332	-81.680484
Ka29	30.807373	-81.680409
Ka3	30.80721	-81.681516
Ka30	30.807466	-81.680397
Ka31	30.807534	-81.68026
Ka32	30.80757	-81.680083
Ka33	30.807557	-81.680062
Ka34	30.807497	-81.680068
Ka35	30.807425	-81.679967
Ka36	30.807454	-81.679907
Ka37	30.807399	-81.679788
Ka38	30.807348	-81.679676
Ka39	30.80727	-81.679511
Ka4	30.807243	-81.681378
Ka40	30.80723	-81.679315
Ka41	30.807235	-81.679211
Ka42	30.807243	-81.679104
Ka43	30.807233	-81.67896
Ka44	30.807255	-81.678846
Ka45	30.807231	-81.678744

Ka46	30.807251	-81.678591
Ka47	30.807333	-81.678563
Ka48	30.807415	-81.678528
Ka49	30.807529	-81.678515
Ka5	30.807245	-81.68127
Ka50	30.807604	-81.678593
Ka51	30.807669	-81.678698
Ka52	30.807779	-81.678683
Ka53=ohwm ditch	30.807925	-81.678545
Ka6	30.807283	-81.681287
Ka7	30.807298	-81.681362
Ka8	30.807344	-81.681241
Kd1=canal	30.807969	-81.678584
Kd10	30.8077	-81.679265
Kd11	30.807679	-81.679389
Kd12	30.807633	-81.679507
Kd13	30.807703	-81.679623
Kd14	30.807754	-81.679612
Kd15	30.807958	-81.679334
Kd16	30.808071	-81.679179
Kd17	30.808198	-81.679
Kd18=canal	30.80825	-81.678924
Kd2	30.807917	-81.678635
Kd3	30.80795	-81.678718
Kd3	30.808366	-81.679615
Kd4	30.807844	-81.678786
Kd4	30.808418	-81.67974
Kd5	30.807889	-81.678892
Kd6	30.807779	-81.678968
Kd7	30.807686	-81.678929
Kd8	30.807611	-81.679082
Kd9	30.807651	-81.679155
Ke1=kfl	30.808285	-81.67935
KE2	30.808364	-81.679502
Ke5	30.808499	-81.679813
Ke6	30.808648	-81.67995
Ke7	30.808626	-81.680108
Ke8 end	30.80861	-81.680259
Kf2	30.808397	-81.679288
Kf3=canal	30.808468	-81.679136

**Edmund Avenue Parcel
Sub-Meter GPS Data**

January 2025

Kb1	30.806942	-81.680436
Kb2	30.80689	-81.680716
Kb3	30.806866	-81.680696
kb4	30.806804	-81.6806
Kb5	30.806838	-81.680461

Kc1	30.806999	-81.679636
Kc10	30.806834	-81.680308
Kc11	30.806888	-81.680305
Kc12	30.806917	-81.680154
Kc13	30.80693	-81.680023
kc14	30.806942	-81.679818
Kc2	30.80698	-81.67949
Kc3	30.806923	-81.679488
Kc4	30.806914	-81.679566
Kc5	30.806913	-81.679652
Kc6	30.806881	-81.679792
Kc7	30.806853	-81.679862
Kc8	30.806813	-81.680037
Kc9	30.806862	-81.680194