



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, MOBILE
CORPS OF ENGINEERS
BIRMINGHAM FIELD OFFICE
218 SUMMIT PARKWAY, SUITE 222
HOMEWOOD, ALABAMA 35209

CESAM RD-I- N
PUBLIC NOTICE NO.
SAM-2010-000672-CHE

August 2, 2010

JOINT PUBLIC NOTICE
U.S. ARMY CORPS OF ENGINEERS AND
STATE OF ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PROPOSED IMPACTS TO 22.6 ACRES OF WETLANDS AND OTHER WATERS OF
THE UNITED STATES FOR THE CONSTRUCTION OF A FEEDSTOCK FLEXIBLE
ETHANOL FACILITY

TO WHOM IT MAY CONCERN: This District has received an application for a Department of the Army permit pursuant to Section 404 of the Clean Water Act (33 USC 1344). Please communicate this information to interested parties.

APPLICANT: Industrial Development Board of Greene County
Attention: Ms. Phillis Belcher
Post Office Box 70
Eutaw, Alabama 35462

AGENT: TTL, Inc.
Attention: Mr. Robert M. White
3516 Greensboro Avenue
Drawer 1128
Tuscaloosa, Alabama 35403

LOCATION: In wetlands, ephemeral streams, and unnamed intermittent streams at Boligee, Green County Alabama (32.79191,-88.049133).

WORK: The applicant proposes to fill 10.2 acres of wetlands and ephemeral drainageways and to dredge 12.4 acres of wetlands to "reactivate" a former borrow / gravel pit in association with the construction of a feedstock flexible ethanol facility, known as the "Flagship" site.

PROJECT PURPOSE: The project propose is to construct a feedstock flexible ethanol facility.

ADDITIONAL INFORMATION: The applicant has provided the following additional information: "Coskata's technology that is to be employed at Flagship, combines proprietary microorganisms and bioreactor technology with gasification and ethanol separation technologies to produce cellulosic ethanol from non-food feedstocks that are both economical and environmentally sustainable. Flagship will be the first commercial facility in the world to utilize

this innovative technology platform. It is expected that Flagship will be of interest to economic leaders worldwide as a model of how to utilize typical carbon-containing waste streams in a process to produce fuel-grade ethanol that is cost competitive with gasoline. Coskata's flexible process can utilize most carbon-containing feedstock. The feedstock would include cellulose-based energy crops such as switchgrass, miscanthus, wood chips, agricultural residues (bagasse, corn stover, etc.) as well as waste streams such as old tires and municipal and industrial organic waste. Coskata predicts that annually the facility will produce 55 million gallons of fuel-grade ethanol from woodchips. Annually, the process is expected to utilize 1.1 million green tons of wood residues which would be supplied by local producers in the Black Belt Region of Alabama. The first commercially viable feedstock flexible ethanol facility needs to be located in an area with a plentiful supply of wood biomass. Alabama has the third most timberland acreage in the 48 contiguous states. The forest industry is the state's largest manufacturing industry, producing an estimated \$15.39 billion worth of products in 2005. The Forest Products Development Center, Auburn University, prepared an analysis of woody biomass resources located within a 75-mile radius of Boligee, Alabama in 2008. The Center estimated that within the 75-mile radius, there are about 3.39 million dry tons of mill residues produced annually from existing forest products manufacturing operations. The Center also estimates there are an estimated 2.44 million dry tons per year of forest residues potentially available. The study area has an estimated 8.64 million acres of timberland which equates to about 76.6 percent forest cover. Greene County Alabama is a deeply impoverished rural area in west-central Alabama. Based on 2000 Census Bureau data, Greene County ranks 67 out of the 67 Alabama counties as the most impoverished. The median income reported for a household in the County was \$19,819, and the median income for a family was \$24,604. The estimated mean household estimate for 2005 is \$20,968 and the projected medium household income \$22,689. Greene County retains distinctively higher unemployment rates as shown in the unemployment rates published by Bureau of Labor of Statistics for July 2009. Greene County unemployment rate was 13.8 percent. The State of Alabama had an unemployment rate of 10.5 percent for that same time and the National unemployment average was 9.4 percent. The construction of Flagship should create about 300 construction jobs. The operation of Flagship would create about 125 to 130 direct jobs. Once the facility is operational, Flagship will be indirectly responsible for about 500 additional jobs that will supply the feedstock that is needed. The proposed location for the Flagship operation is a 235-acre parcel of land located in the Crossroads of America Industrial Park (COAIP) in Greene County, Alabama. The COAIP is owned by the Industrial Development Board of Greene County, who is the permit applicant. The undeveloped, agricultural parcel of land is depicted on the attached Figure 1, a portion of the U.S.G.S. 7.5-minute topographic Boligee, AL quadrangle. Figure 2 is an aerial image of the subject parcel.”

Additionally, the applicant intends to seek separate verification under Nationwide Permit 7, *Outfall Structures and Associated Intake Structures*, for a diffuser that will be located in the Tombigbee River.

AVOIDANCE AND MINIMIZATION: The agent has submitted the following statement: “The Crossroads of America Industrial Park has two large (greater than 200 acres) sites located within the park that are suitable for Coskata's Flagship facility (Figure 3). The large site locations differ in present and historical use and ecological value. Located in the northwestern portion of the park is a large Greenfield area that is suitable in size for the Flagship facility. A second large site is located in the southern portion of the Industrial Park, and which is currently being leased for agriculture. The northwestern Greenfield site is undeveloped and leased for hunting. The site has been timbered in the past but is currently covered with mature mixed hardwood forest. Canopy cover in this area is greater than 90 percent and the area is contiguous with similar Greenfields outside of the Industrial Park. Within this Greenfield area, vegetation is healthy and diverse and wildlife is abundant. Aquatic resources in this area include hardwood bottom wetlands and intermittent streams. These aquatic resources are fully functional. Coskata avoided impacts of high quality aquatic resources within this Greenfield area by selecting the southern potential site location for their facility. The final site selected within the Crossroads of America Industrial Park for the Flagship Project is not a Greenfield site. The proposed location has been utilized for sand/gravel mining and agriculture for more than 50 years. The site does have remnants of emergent wetlands but the wetlands have been mostly impacted by farming. Several of the wetland features are the result of ditching to drain the farmland. The wetlands within the Coskata site are low quality as hydrology, soil, and vegetation have all been impacted by historical use. Figure 4 depicts the subject Flagship parcel and surrounding property ownership. Representatives of Coskata and Harris Group traversed the selected site location in 2008. After the site reconnaissance, Coskata, Harris Group, and the Greene County Industrial Development Board met to develop scenarios for the layout of the facility and the attendant features in a manner to avoid as much direct wetland impacts and reduce secondary impacts where possible. Figure 5 depicts the USACE verified wetland delineation upon the Flagship parcel. After considering numerous possible layout options, Coskata and Harris Group were able to produce a site layout that would allow for efficient use of space and allow for the logical sequencing of their technology process. The initial site plan would have impacted about 36.14 of wetlands. The final site layout reduced wetland impacts to about 22.6 acres of low quality wetlands or a reduction of approximately 38 percent of the originally proposed plan. Figure 6 depicts the redesigned Flagship facility layout/footprint and areas of disturbance to wetlands and waters of the U.S.” *The U.S. Army Corps of Engineers has not evaluated the adequacy of the avoidance and minimization statement at this time.*

COMPENSATORY MITIGATION: The applicant is proposing off-site, in-kind permittee mitigation. In regards to the proposed mitigation, the agent has submitted the following statement: “The conceptual mitigation plan involves restoration and enhancement of [~ 45 acres of] wetlands that have been degraded through past land use and landscape modification.” *The U.S. Army Corps of Engineers has not evaluated the adequacy of the mitigation proposal at this time.*

ALTERNATIVES: The agent has submitted the following statement: “Site selection for Coskata's Flagship facility was contingent, first and foremost, upon the site being located in an area that contained a plentiful supply of wood biomass. In 2008, Coskata sponsored a high level scan of the United States for regions with a plentiful supply of wood biomass and determined that the Southeast United States was the region with the highest potential. Additionally, the site needed to be located near a major transportation artery and have access to plentiful water for the ethanol production process. Alternate transportation venues (rail and water), though not a current site requirement, could be a future advantage for receiving feedstock and/or shipping of finished product. After identifying the Southeast as the region with the highest wood biomass potential, Coskata then started working with state development offices across the Southeast to identify sites within a 50-mile radius of the regions with the highest wood biomass potential. Among the Southeastern states, Alabama was the most promising because it contained five separate areas with high wood biomass potential. The potential locations within Alabama included the areas around Boligee/Tuscaloosa, Childersburg, Scottsboro, Ft. Payne, and Troy. Alabama also stood out because of the resources and support provided by Auburn University and the Alabama Development Office. The Boligee/Tuscaloosa area was identified as having the most potential of the five locations because of the potential feedstock located within each county and the plentiful feedstock located in adjacent counties. The Alabama Development Office identified and presented Coskata with three potential sites in the Boligee/Tuscaloosa area that matched their initial site selection criteria. Two sites were located in Tuscaloosa County and one site was located in the Crossroads of America Industrial Park in Boligee. Representatives from Coskata visited each of the sites in August 2008. One of the sites in Tuscaloosa was immediately eliminated from consideration because of the small size and site layout. The remaining two sites were screened and rated by Coskata using their site selection criteria, which included availability of utility and logistics infrastructure, and land features (size, layout, preparation needed, environmental risk, and price). While both sites ranked high, the Tuscaloosa site was eliminated because the owner was not willing to sell; therefore, the focus of Coskata commercial development efforts became the Crossroads of America Industrial Park in Boligee which meet all of their site selection criteria. The Crossroads of America Industrial Park also had features that would be appreciated if future expansion became desirable. Representatives of the Crossroads of America Industrial Park have shown the Coskata selection team four possible parcels located within the park that were thought suitable for site location. Figure 3 depicts the Flagship parcel of land and the three other parcels considered during alternatives analysis of near-vicinity property. It was determined that Crossroads Flagship Site 1 and Site 2 were too small in acreage to allow adequate placement of the proposed facility. There are two large parcels greater than 200 acres situated within the park. The sites labeled Flagship Site 4 "Northwest" and Flagship Site 3 "South" offered different park infrastructure advantages to Coskata. The northwest site is situated close to the Tombigbee River and adjacent to a proposed future second port facility in the park. There are existing water and sewer lines, and a frontage road along the eastern border of the northwest site. Three major areas of concern became apparent for the northwest site that included the following: 1. Rail access would require extending the existing railroad spur about ½ mile to the northwest that also would cross Brush Creek, creating both environmental issues

and large construction costs. 2. The initial layout of the facility determined that more than 50 percent of the area proposed for permanent structures lay below the 100-year flood elevation. 3. The existing frontage road to the northwest site would have to be upgraded substantially to support anticipated truck traffic. The evaluation of Flagship Site 3 "South" demonstrated very strong advantages over the northwest site. The parcel boundaries of Site 3 "South" would allow the facility layout of structures and processes to operate more efficiently and safely. A north access road to accommodate the 150 daily truck loads of wood would be totally separated from the employee and product traffic along the south frontage road. The existing rail spur borders the entire north boundary of this site. The majority of the site is relatively flat, open fields that currently contain agricultural crops. All elevation contours of the proposed areas for permanent structures are above the 100-year flood elevation. The existing topography would reduce the site grading requirements considerably as compared to the northwest parcel. The final site selected within the Crossroads of America Industrial Park for the Flagship Project is not a Greenfield site. The proposed location has been utilized for sand/gravel mining and agriculture for more than 50 years. The site does have remnants of emergent wetlands but the wetlands have been mostly impacted by farming. The wetlands within the Coskata site are low quality as hydrology, soil, and vegetation have all been impacted by historical use. By contrast, the other potential Flagship site location within the industrial park is a Greenfield site. The Greenfield site within the industrial park has aquatic resources (though not pristine), has not been as impacted by historical mining or agricultural use, and is of much higher quality. *The U.S. Army Corps of Engineers has not evaluated the adequacy of the alternatives statement at this time.*

WATER QUALITY: The applicant has applied for state certification in accordance with Section 401(a)(1) of the Clean Water Act, and has certified that the proposed activity complies with and will be conducted in a manner that is consistent with the State Coastal Zone Management Program. Upon completion of the required advertising and public comment review, a determination relative to consistency will be made by the Alabama Department of Environmental Management.

COMMENTS: This public notice is being distributed to all known interested persons in order to assist in developing facts on which a decision by the U.S. Army Corps of Engineers can be based. For accuracy and completeness of the record, all data in support of or in opposition to the proposed work should be submitted in writing setting forth sufficient detail to furnish a clear understanding of the reasons for support or opposition. The decision whether to issue a permit will be based on an evaluation of the probable impact, including cumulative impacts, of the proposed activity on the public interest. That decision will reflect the national concern for both protection and use of important resources. The benefit which reasonably may be expected to accrue from the proposal must be balanced against its reasonably foreseeable detriments. All factors which may be relevant to the proposal will be considered, including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation,

water quality, energy needs, safety, food production, and in general, the needs and welfare of the people.

The Corps is soliciting comments from the public; Federal, State, and local agencies and officials; Indian Tribes; and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the Corps to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in the preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application. Requests for public hearings shall state with particularity, the reasons for holding a public hearing.

Evaluation of the probable impacts involving deposits of dredged or fill material into waters of the United States will include the application of guidelines established by the Administrator of the U.S. Environmental Protection Agency.

The National Register of Historic Places has been consulted and no properties listed in or eligible for the National Register are known to exist which would be affected by the proposed work. Additionally the applicant has conducted a Phase I Study of the project site which has been submitted to the Alabama Historical Commission (*AHC 10-0911*). This review constitutes the full extent of cultural resources investigations unless comment to this notice is received documenting that significant sites or properties exist which may be affected by this work, or that adequately documents that a potential exists for the location of significant sites or properties within the permit area. Copies of this notice are being sent to the U.S. Department of the Interior, National Park Service, Division of Archeological Services.

A preliminary review of this application and the U.S. Department of the Interior List of Endangered and Threatened Wildlife and Plants indicates that the proposed activity will not affect listed endangered or threatened species, or their critical habitat. Additionally, the applicant has surveyed the site for threatened and endangered plant and animal species; however, this report has yet to be reviewed the U.S. Fish and Wildlife Service. The National Marine Fisheries Service requires the evaluation of impacts to Essential Fish Habitat (EFH) of estuarine species. The proposed project will not impact EFH.

Correspondence concerning this Public Notice should refer to Public Notice Number listed at the beginning of this document and should be directed to:

District Engineer
ATTN: Casey Ehorn
U.S. Army Engineer District, Mobile
Birmingham Field Office
218 Summit Parkway, Suite 222
Homewood, Alabama 35209

with a copy to the:

Alabama Department of Environmental Management
Post Office Box 301463
Montgomery, Alabama 36130-1463

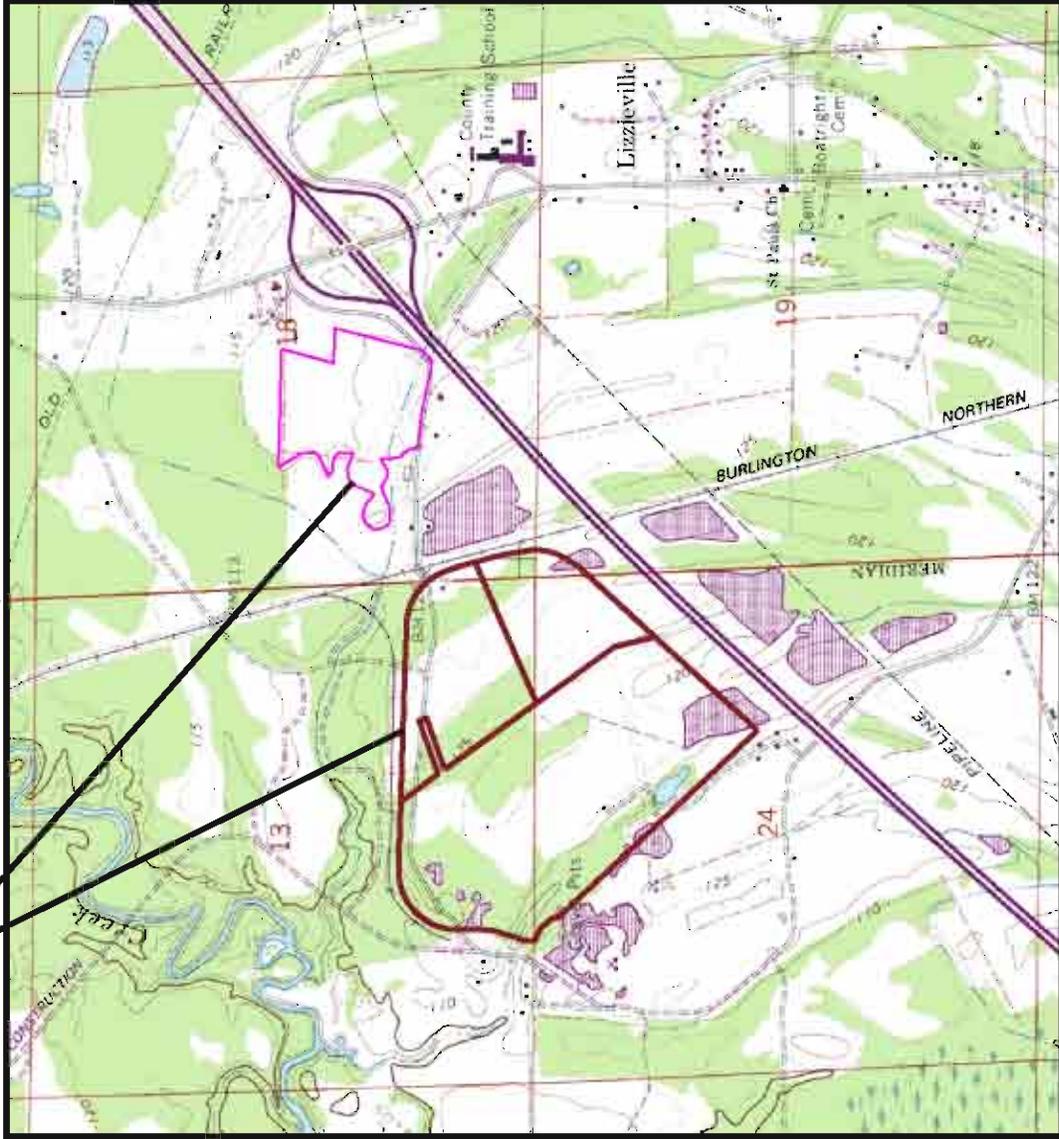
All comments must be sent in time to be received not later than 30 days from the date of this notice.

If you have any questions concerning this publication, you may contact Mr. Casey Ehorn at telephone number (205) 290-9096. For additional information about our Regulatory Program, please visit our web site at www.sam.usace.army.mil/RD/reg, and please take a moment to complete our customer satisfaction survey while you're there. Your responses are appreciated and will allow us to improve our services.

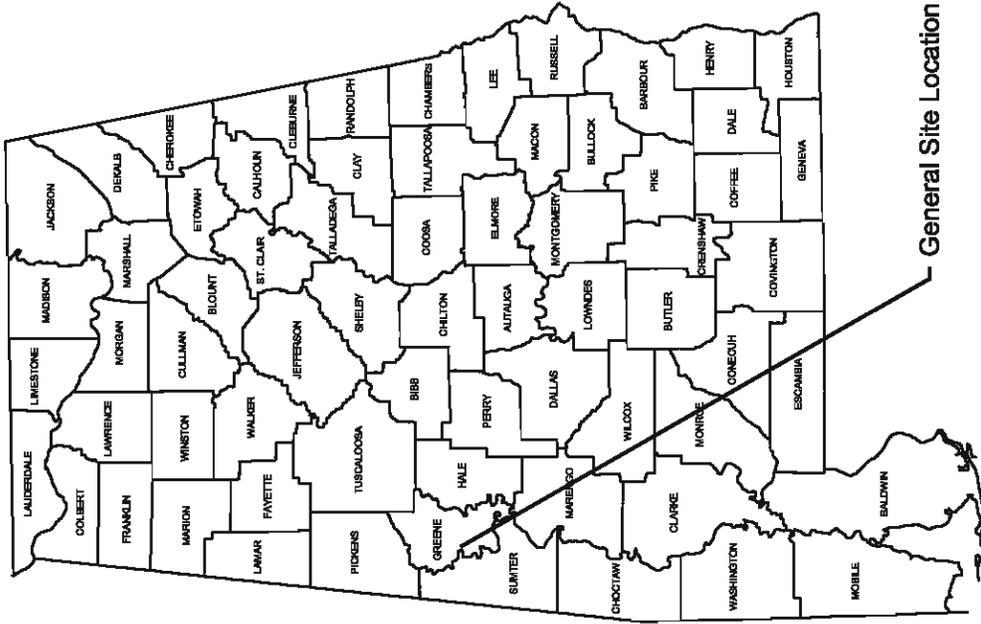
MOBILE DISTRICT
U.S. Army Corps of Engineers

Enclosure

Approximate Mitigation Site Boundary
Approximate Flagship Boundary



Source: USGS Boligee, Ala. 7.5 Minute Quadrangle Map, 1970 (Photorevised 1987)



General Site Location



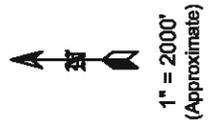
3516 Greensboro Avenue ■ Tuscaloosa, Alabama 35401
206.345.0815 ■ Fax 205.345.0892

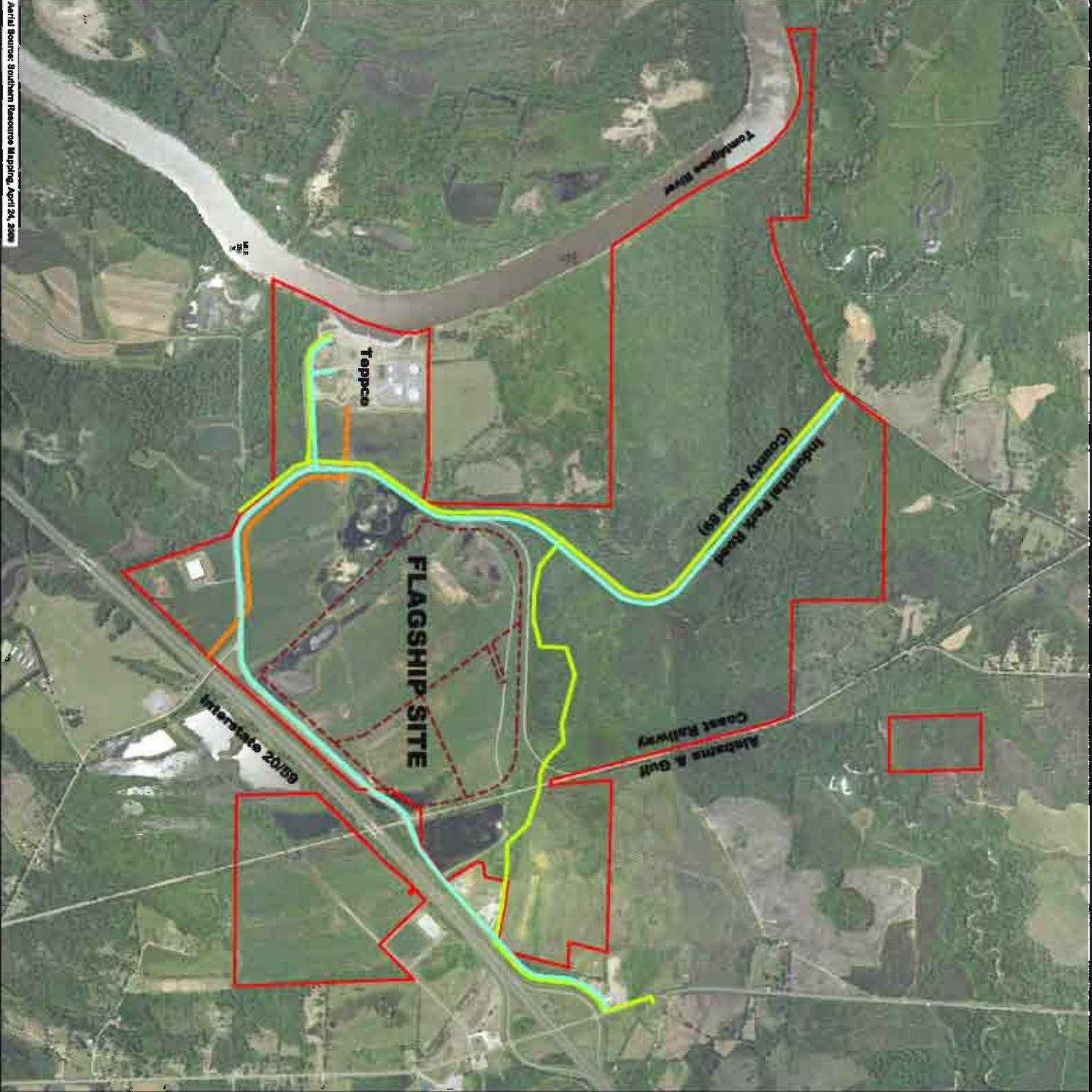
TTL PROJECT NO: 600109007
PROJECT DATE: June 16, 2010

Figure 1. Site Location and Topographic Map

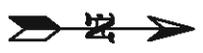
Sec. 13 and 24, T. 21 N., R. 1 W., and Sec. 18 and 19, T. 21 N., R. 1 E., of the Boligee, Ala. 7.5 Minute Quadrangle Map
Proposed Flagship and Mitigation Bank Boundaries

Crossroads of America Industrial Park
Boligee, Greene County, Alabama





LEGEND



-  Draft Park Boundary
-  Draft Flagship Site Boundary
-  Approximate Sewer Line Locations
-  Approximate Water Line Locations
-  Approximate Colonial Pipeline Location
-  Draft Flagship Site Boundary

Note: Utility scale and locations are shown exaggerated for clarity



3516 Greenboro Avenue ■ Tuscaloosa, Alabama 35401
 205.345.0811 ■ Fax 205.345.0892

TTL PROJECT NO: 600109007

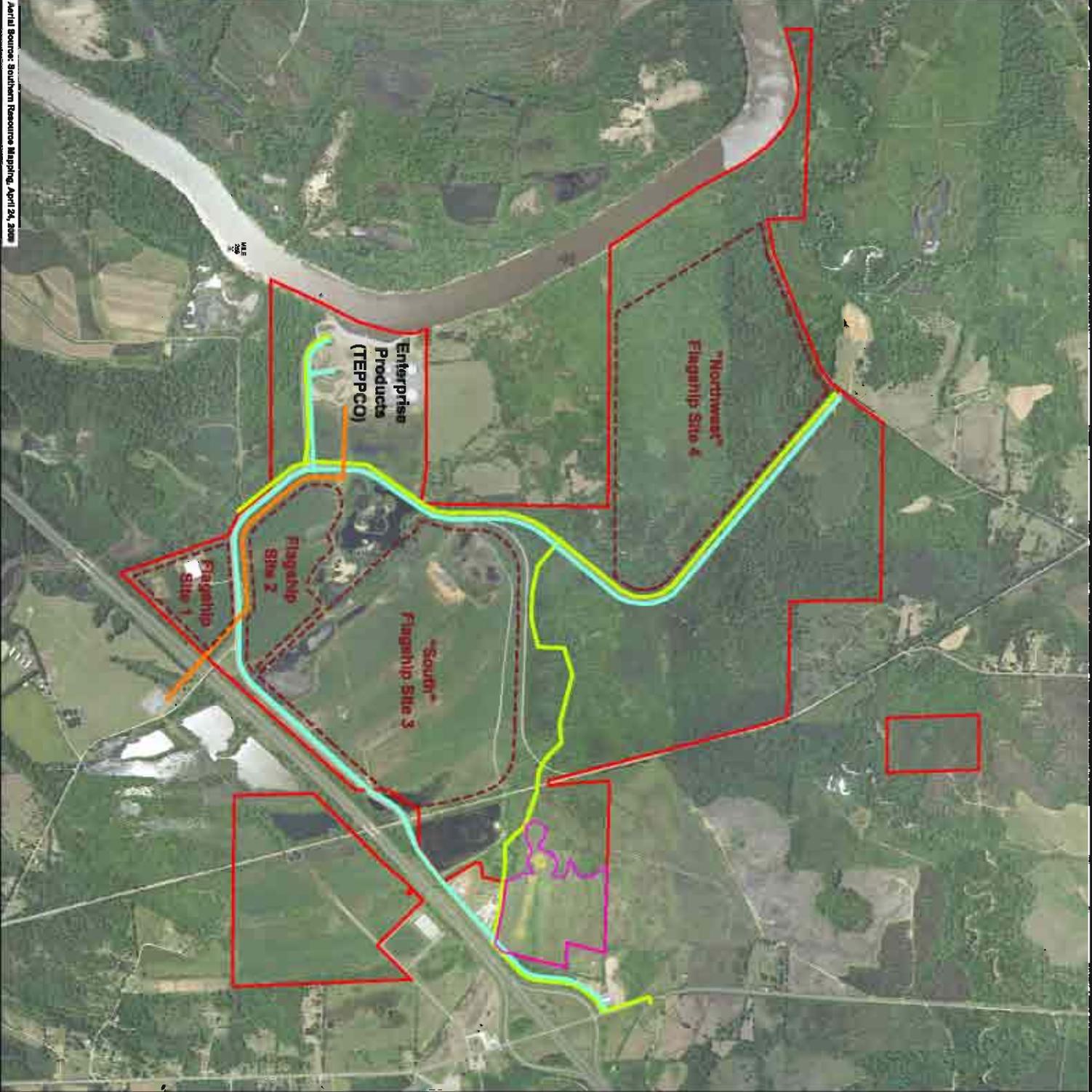
PROJECT DATE: July 1, 2010

Figure 2

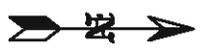
**Draft Flagship Site and Industrial Park
 Property Boundaries with Existing
 Utilities**

Greene County Industrial Development Board
 Crossroads of America Industrial Park
 Boligee, Greene County, Alabama

Scale: 1" = 2000'



LEGEND



- Draft Park Boundary
- Approximate Sewer Line Locations
- Approximate Water Line Locations
- Approximate Colonial Pipeline Location
- Draft Flagship Site Boundary
- Proposed Wetland Mitigation Tract

Note: Utility scale and locations are shown exaggerated for clarity



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 205.345.0818 ■ Fax 205.345.0892

TTL PROJECT NO: 600109007

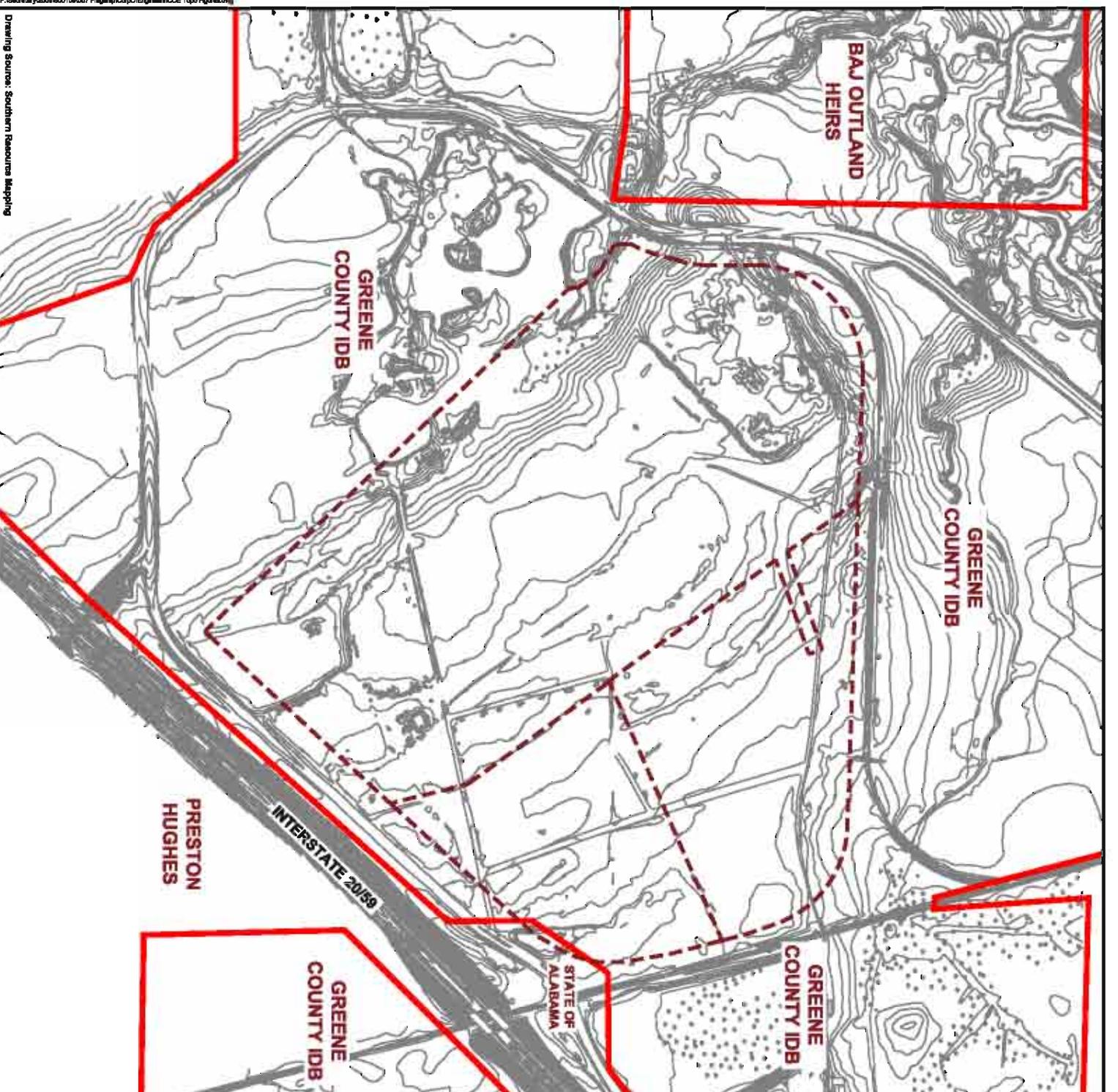
PROJECT DATE: July 1, 2010

Figure 3

Draft Flagship Sites and Industrial Park Property Boundary with Existing Utilities

Greene County Industrial Development Board
 Crossroads of America Industrial Park
 Boligee, Greene County, Alabama

Scale: 1" = 2000'



LEGEND

-  Draft Park Boundary
-  Draft Flagship Site Boundary



3516 Greenbory Avenue ■ Tuscaloosa, Alabama 35401
206.345.0616 ■ Fax 206.345.0992

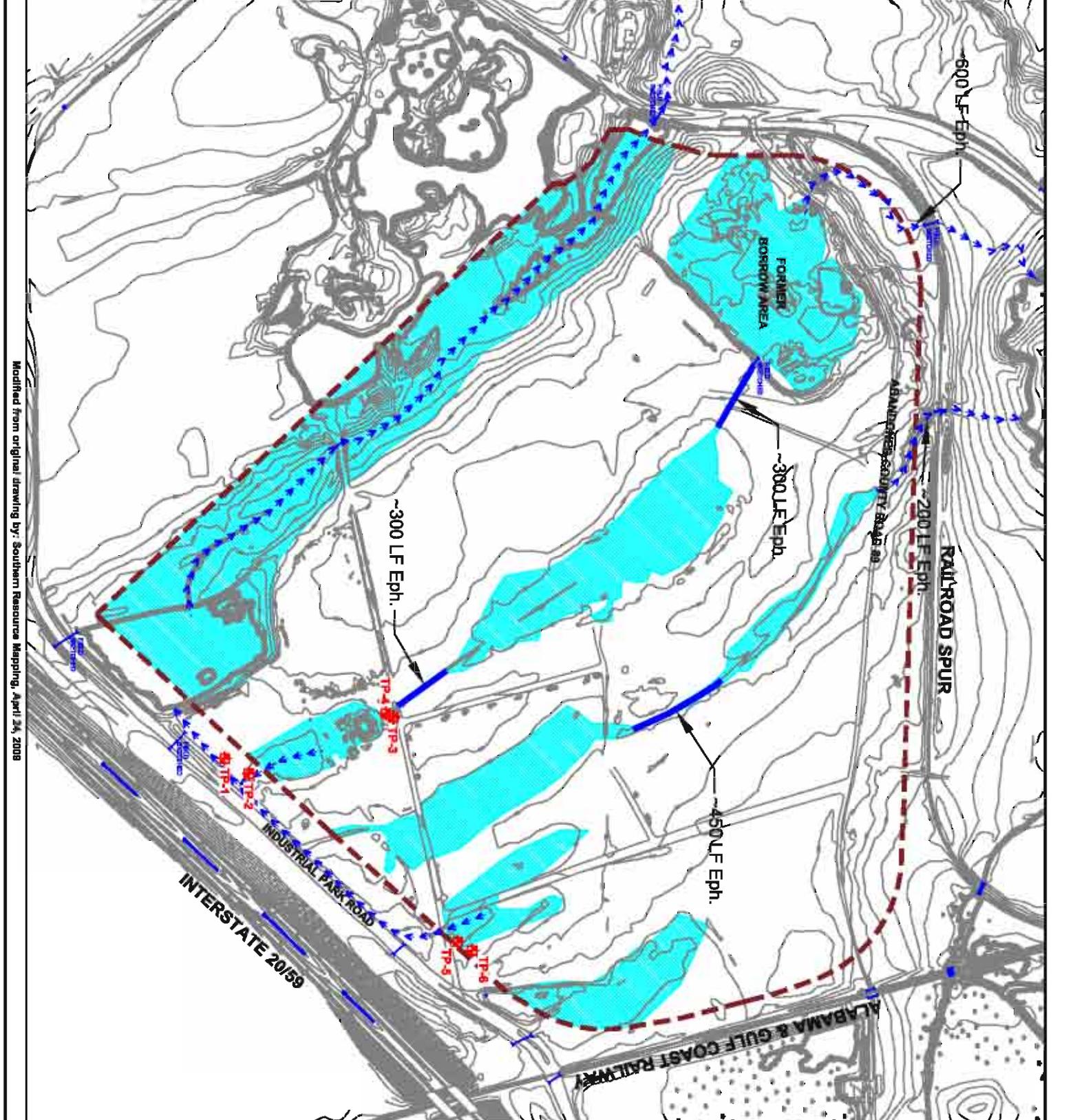
TTL PROJECT NO: 6007109007
PROJECT DATE: July 1, 2010

Figure 4
Flagship Site

Surrounding Property Ownership

Greene County Industrial Development Board
Crossroads of America Industrial Park
Boltge, Greene County, Alabama

Scale: 1" = 800'



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- Other Waters of the U.S.
- Approximate Property Boundary
- Wetland and Open Water Boundaries
- Approximate Test Pit Location and Identifier
- Surface Water Conveyances
- Culverts

Site Description:
 Approximately 235 Total Site Acres
 Approximately 73 Acres of Wetlands and Open Water
 Delimited
 Approximately 1,850 Linear Feet of Other Waters of the U.S. Delimited

Figure 5
 Wetland and Other Waters of the U.S.
 Location Map

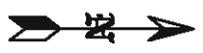
Greene County Industrial Development Board
 Proposed Flagship Site
 Waters of the U.S. Delineation and Delineation
 Boliger, Greene County, Alabama



Section, Township and Range: S. 13 and 24, T. 21 N, R. 1 W and S. 18 and 19, T. 21 N, R. 1 E	
Latitude: 32° 47' 30" N Longitude: 88° 02' 49" W	
TTL Project Number: 600109007	
File Path: F:\bawley\0008109007_Flyback\CD\Fig\new\005_Topo_Figuring.dwg	
Date Created: 05/11/2010	Revision No.: 1
Drawn By: njc	Date Revised: 06/15/2010
Reviewed By: Bob White	
Project Manager: James C. Bamberger, P.E.	



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 Draft Flagship Site Boundary

 Delineated Wetland Areas (on 04/12/2010)

Total Area = 72.71 Acres

 Wetland Areas Impacted by Design

Total Impact = 22.6 Acres



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TTL PROJECT NO: 600109007

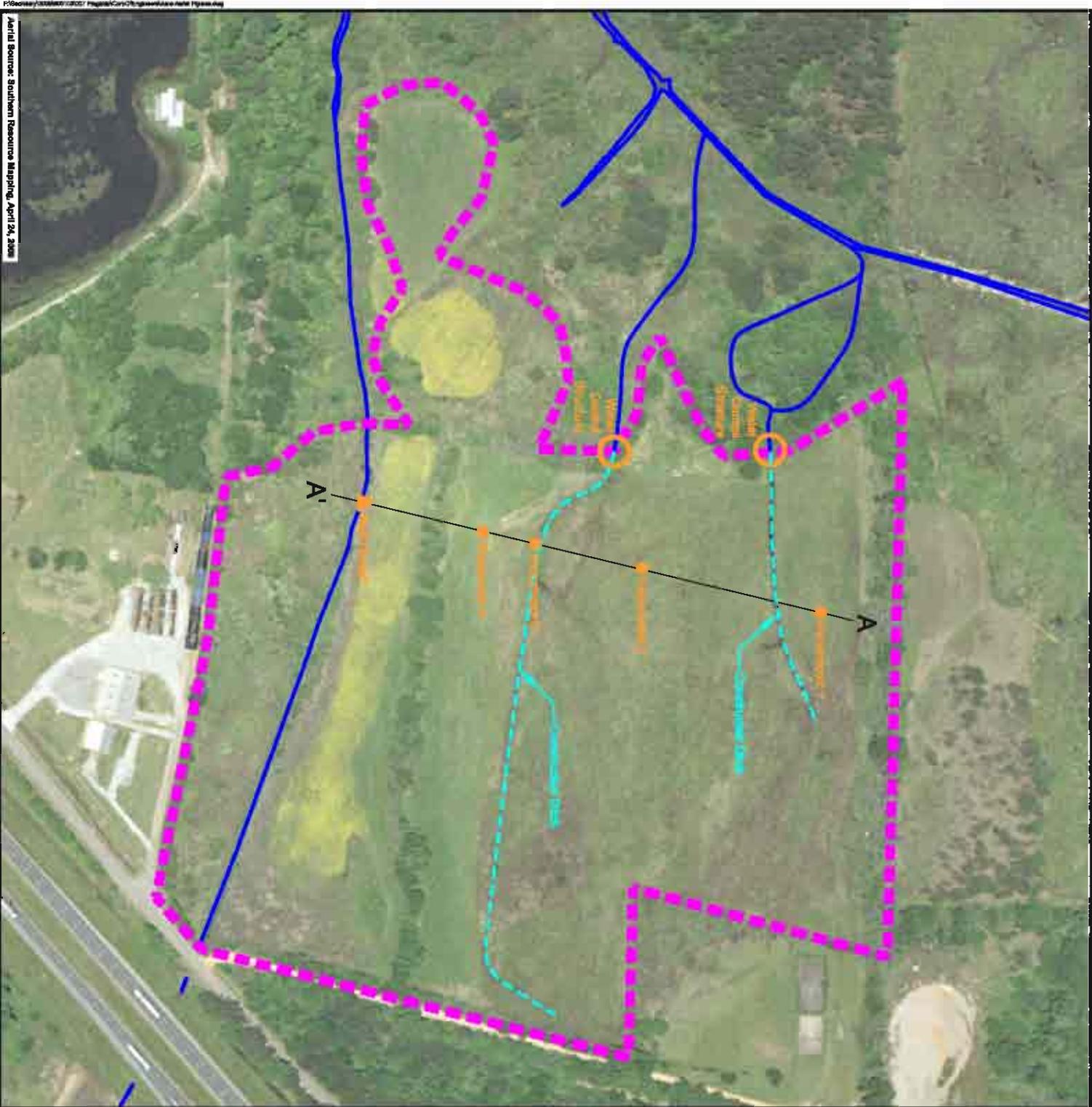
PROJECT DATE: July 1, 2010

Figure 6

Flagship Wetlands Impact

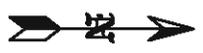
Greene County Industrial Development Board
Crossroads of America Industrial Park
Boligee, Greene County, Alabama

Scale: 1" = 600'



Aerial Source: Southern Resource Mapping, April 24, 2010

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Proposed Wetland Tract

A — A' Cross Section Transect



3516 Greenboro Avenue ■ Tuscaloosa, Alabama 35401
 205.345.0818 ■ Fax: 205.345.0892

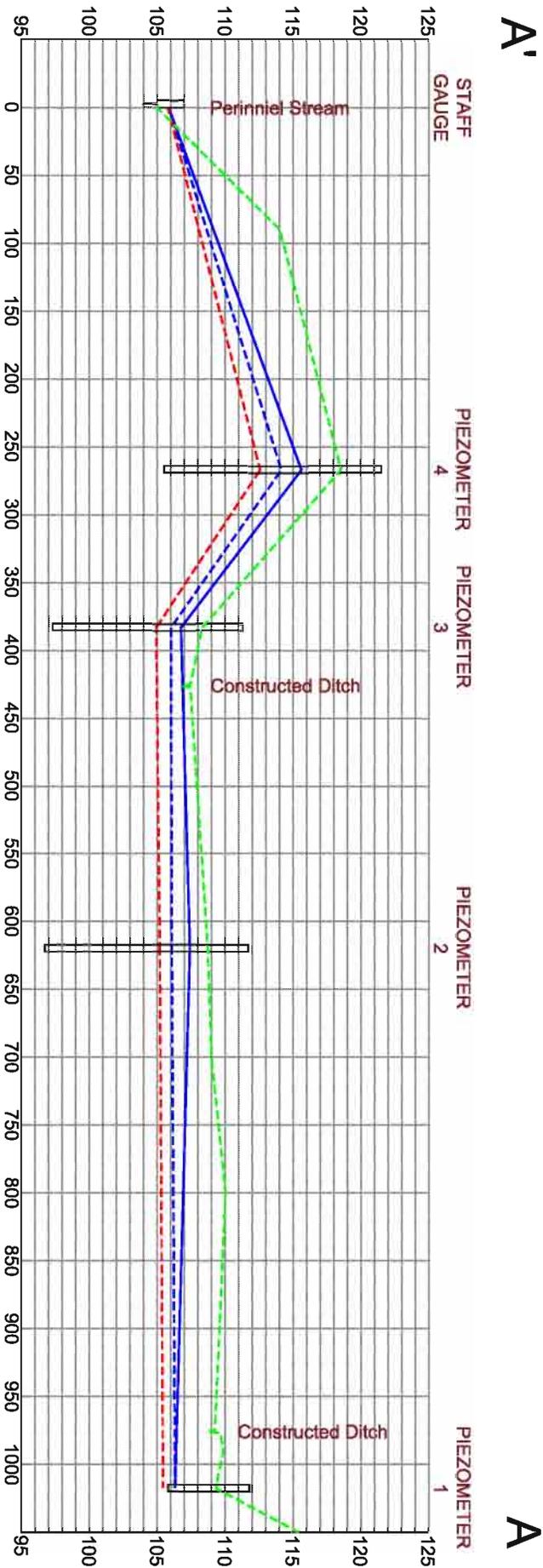
TTL PROJECT NO: 600109007
 PROJECT DATE: July 1, 2010

Figure 7

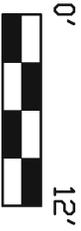
Hydrologic Detail

Greene County Industrial Development Board
 Crossroads of America Industrial Park
 Boligee, Greene County, Alabama

Scale: 1" = 300'



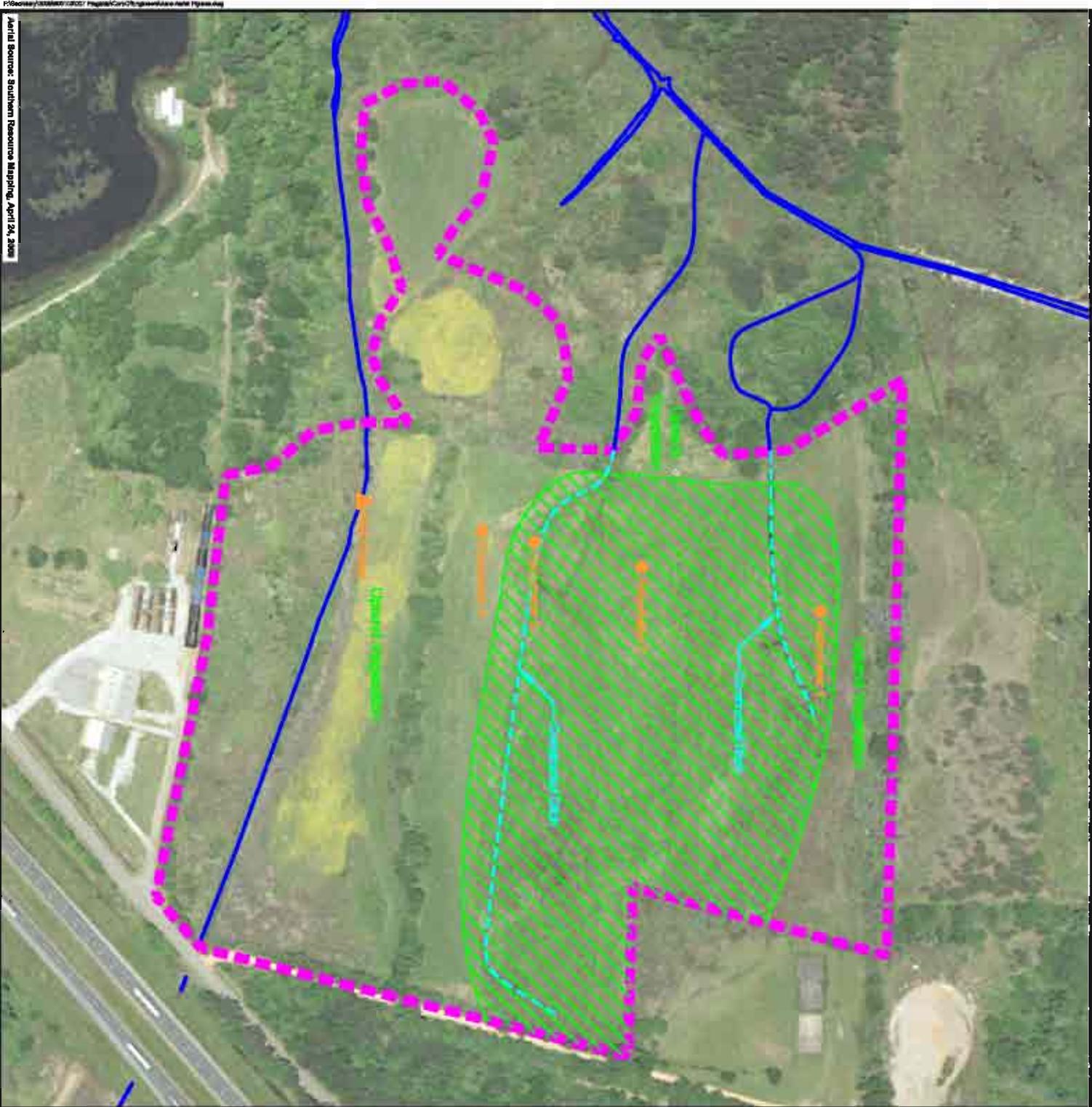
- - - Relative Ground Elevation
- Water Level at Piezometer Installation (March 9, 2010)
- - - Water Level on April 12, 2010
- - - Water Level on May 21, 2010



3515 Greenboro Avenue ■ Tuscaloosa, Alabama 35401
 205.345.0616 ■ Fax 205.345.0882

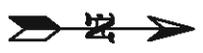
Figure 9
Transect Cross Section
 Greene County Industrial Development Board
 Crossroads of America Industrial Park
 Boligee, Greene County, Alabama

Project Date: **July 1, 2010**
 Approximate Scale: **1" = 12'**
 TTL Project No.: **600109007**



Aerial Source: Southern Resource Mapping, April 24, 2010

LEGEND



 Proposed Wetland Tract
Approximate Total Area = 45 Acres

 Restored Wetland Vegetation Area
Approximate Total Area = 17 Acres



3516 Greenboro Avenue ■ Tuscaloosa, Alabama 35401
205.345.0818 ■ Fax 205.345.0892

TTL PROJECT NO: 600109007
PROJECT DATE: July 1, 2010

Figure 10

Vegetation Prescription

Greene County Industrial Development Board
Crossroads of America Industrial Park
Boligee, Greene County, Alabama

Scale: 1" = 300'