

ENVIRONMENTAL PROTECTION DIVISION
PUBLIC NOTICE
WATERSHED PROTECTION BRANCH

June 17, 2026
Notice Issue Date

Cook County
City / County

July 17, 2026
Notice Close Date

SAS-2016-00016
Control Number

Sec. 401 Water Quality Certification

Wayne-Sanderson Farms Loop Track Expansion - US Army Corps of Engineers Sec. 404 Permit Application

This notice is issued to inform the public that a request has been received for water quality certification (WQC) in accordance with Section 401 of the Clean Water Act. The public is invited to comment during this 30-day period on the proposed activity. Information pertaining to the project is attached to this notice. Since the request is specific to 401 WQC, only comments pertaining to water quality are considered under the certification review process. Comments may be submitted via e-mail to: EPD.WQC@dnr.ga.gov. Comments may also be provided in writing to: Program Manager, Wetlands Unit, 2 Martin Luther King, Jr. Dr. SE, Suite 1052 East, Atlanta, GA 30334. Include the words "Water Quality Certification Comment" and the Control Number above in the e-mail subject line or on the top of the first page of written comments to ensure that your comments will be forwarded to the appropriate staff. For additional information, contact DJ Fontenot at donald.fontenot@dnr.ga.gov.

Type of Permit Application: 401 Water Quality Certification

Applicable Law: Federal Clean Water Act, 33 U.S.C. § 1341

Applicable Rules: 40 CFR part 121

Description and Location of Proposed Activity:

Wayne-Sanderson Farms, LLC is seeking a Section 401 Water Quality Certification for a railway track expansion project at an existing feed mill facility. The 192-acre project area is located east of I-75 and west of US Highway 41, south of Adel, Cook County, Georgia (31.0955, -83.4139). As proposed in the March 23, 2026 USACE Public Notice, the project would expand the existing rail loop track within an approximately 70-foot right-of-way along the planned loop track alignment at the Adel, GA Facility to increase storage capacity and construct associated infrastructure.

The project, as currently proposed, requires a USACE Section 404 permit and proposes approximately 0.98 acre of forested wetland and approximately 0.12 acre of emergent wetland fill impacts. To offset unavoidable impacts to wetlands, the applicant has proposed to purchase 6.56 legacy wetland credits from Cecil Bay Mitigation Bank.

Name and Address of Permit Applicant: Paul Billingsley
Wayne-Sanderson Farms, LLC
4110 Continental Drive
Oakwood, GA 30566



June 01, 2026

Via email: Donald.Fontenot@dnr.ga.gov
Terry.C.Kobs@usace.army.mil

Mr. DJ Fontenot
Environmental Compliance Specialist
Wetlands Unit / Watershed Protection Branch
Environmental Protection Branch

**Re: Wayne-Sanderson Farms, LLC
Adel, GA Facility – Loop Track Expansion Project
Adel, Cook County, Georgia
USACE File Number: SAS-2016-00016
Scope of Review for Water Quality Certification**

Dear Mr. Fontenot:

As you are aware, Headwaters, Inc. has been retained by Wayne-Sanderson Farms, LLC to serve as agent on their behalf in all matters regarding the needed regulatory permit authorizations for the above referenced Adel, GA Facility – Loop Track Expansion Project located in Adel, Cook County, Georgia.

PROJECT DESCRIPTION

Wayne-Sanderson Farms, LLC proposes to expand their existing Adel, GA feed mill facility loop track infrastructure. This facility is serviced by mainline rail supplier - Norfolk Southern. The existing facility loop track has capacity for 83 cars and 3 locomotives with 12 cars in the existing soft stock track. The planned expansion will increase the loop track capacity to 110+ cars and 5 locomotives with 44+ cars in soft stock. The existing loop track that is being abandoned will be utilized for that increased soft stock storage. The planned loop track expansion project will also include some minor (app. 250' on each end) of existing track shift and installation of new No. 10 turnouts on each end of the planned loop expansion track where it merges with the existing loop track. No other improvements are planned to the existing facilities' infrastructure as part of the current scope of work. The planned loop track expansion alignment and scope of work is depicted on the included site exhibits.

As part of the planned grading and track construction, it is anticipated that approximately 0.98 acres of forested wetland (PFO) and approximately 0.12 acres of emergent wetland (PEM) habitats will be permanently filled as part of the planned loop track expansion activities. The planned loop track construction will be contained within an approximate 70' right-of-way along the planned loop track alignment. Areas outside of the proposed loop track corridor will be avoided with no anticipated adverse impacts to these habitats outside of the planned grading limits associated with the planned site development. These impacts to jurisdictional wetland

habitat would be considered as unavoidable and necessary to support the planned project's purpose and need. Also, the planned project will include the required grading to provide adequate storm water drainage through the site interconnecting with the existing facility storm water infrastructure.

Wayne-Sanderson Farms, LLC plans to start construction on this project in Q3 2026, and construction is expected to take approximately one (1) year to complete all phases of the planned project.

Site plans and "Other Waters of the U.S." location / impact maps of the proposed project site are included within **Attachment A**.

PROJECT PURPOSE & NEED

The purpose of the planned loop track expansion project is to provide the necessary rail car storage and staging loop track lengths to support the existing feed mill facility. The existing track infrastructure at this facility does not provide adequate railcar storage to support the import and export of raw and produced feed products. To continue the overall company production plan, it is required to have additional storage and staging track space available, which will be achieved through the construction of the planned project. This feed mill facility supports the various contract grow facilities in the south GA / north FL area owned by the applicant. The additional railcar storage and staging space is imperative to keep up with the demand of the area's feed production requirements.

It should be noted that the planned loop track expansion project is required to be located directly adjacent to the existing Wayne-Sanderson Farms, LLC - Adel, GA feed mill facility and existing loop track infrastructure in order to serve its purpose and connect back to the existing track connections to the Norfolk Southern (NS) mainline rail system. NS is considered the Tier 1 railroad serving as the mainline railroad service provider for the facility. Wayne-Sanderson currently solely owns and maintains the subject property in which the existing feed mill facility and supporting infrastructure is located, with plans to purchase the directly adjacent southern parcel from the Cook County Industrial park authority to facilitate the planned loop track expansion project. Therefore, as discussed with the USACE, the search for other "off-site" properties were not strongly considered by the applicant for the completion of the planned project.

Site & Design / Layout selection criteria for the proposed project included:

- Size - The selected site needs to be sufficient in size to provide the minimum space for construction of the loop track expansion, to support at minimum 110+ cars, 5 locomotives, and 44 cars in soft stock.
- Location - The selected site must be located directly adjacent to the existing Wayne-Sanderson Farms, LLC - Adel, GA feed mill facility. The selected site also needs to be in proximity to the existing facility rail / track infrastructure to be considered viable.
- Logistics - The selected site needs to be in proximity to connection with the NS mainline rail system for mainline rail services, which is necessary for raw material imports and product exports.

- Infrastructure – The selected site needs direct access to the existing rail infrastructure to be connected into the facility rail system and overall mainline railroad transportation grid (NS) within this region of south GA. Again, access to the NS mainline and existing facility loop track infrastructure is considered critical for the operations of the facility and the achievement of the purpose of the project. The selected site must also limit interference with existing underground and aboveground utility infrastructure in the general area.
- Zoning – The selected site needs to be properly zoned to allow for the proposed development (i.e., moderate intensity, higher intensity).
- Environmental – The selected site needs to minimize impacts to natural resources (i.e., floodplains, wetlands, streams, etc.)
- Availability – The selected site needs to be available for purchase and/or part of the existing landholdings acquired to support the growth and development of the facility.

Presently, we are coordinating with the U.S. Army Corps of Engineers (USACE) regarding the issuance of a Section 404 wetland permit that may be referenced under USACE project number SAS-2016-00016. As part of this request, we are concurrently coordinating with GA DNR - EPD regarding Section 401 WQC. On behalf of Wayne-Sanderson Farms, LLC, Headwaters, Inc. applied for a Department of the Army Permit from the USACE, Savannah District on January 08, 2026 (**See Attachment C**). Per 11 Administrative Code Part 6 Rule 1.3.2, the application for WQC shall be the public notice issued by the Federal permitting agency. The public notice was issued by the USACE, Savannah District on March 23, 2026 (**See Attachment C**). It expired on April 23, 2026. The only comments received were from GA DNR - EPD relating to the 401 WQC Request and from the USACE - Savannah District on the Alternative Design Analysis, which has been prepared and submitted for review. A pre-file meeting with GA - DNR - EPD was requested on March 24, 2026, and was conducted on March 31, 2026, between GA DNR - EPD, Foster Jones & Associates, Wayne-Sanderson Farms, LLC, and Headwaters, Inc. Following the pre-file meeting, Headwaters, Inc. received comments from GA DNR - EPD regarding the major components required to complete the processing of the WQC request. As required by GA DNR - EPD's regulations for 401 WQC outline the information that must be provided to GA DNR - EPD to complete the application. These major components are being submitted to your office for review.

As such, we request review of the following information as part of the "Scope of Review" to complete the application for the issuance of the Section 401 WQC. The applicant hereby certifies that all information contained herein is true, accurate, and complete, to the best of their knowledge and belief. The applicant hereby requests that GA DNR - EPD review and take action on this CWA 401 certification request within the applicable reasonable period of time.

ALTERNATIVE DESIGN ANALYSIS

A wetland and other waters delineation was performed by Headwaters, Inc. on an approximately 192.00-acre site adjacent to the existing facility to identify any wetlands and/or streams within the limits of the subject property. The delineation revealed the presence of 38.46 acres of forested wetlands (PFO), 0.20 acres of emergent wetlands (PEM), and 0.87 acres of open water ponds (POND) within the chosen site boundaries. Once the delineation of the site was complete, and all aquatic resources were identified, we worked with the applicant and design engineer to determine that best site design / loop track alignment that meets the project's goals and purpose while still minimizing and avoided crucial aquatic resources. Ultimately, the chosen design was

determined to be the Least Environmentally Damaging Practicable Alternative (LEDPA). The designs that were considered, as well as the chosen alternative, are described in detail within **Attachment B**.

Considering the required amenities to specifically include rail access, zoning, parcel size, adjacency to the existing infrastructure and NS mainline, etc., the number of applicable site designs /loop track alignments to support the completion of this project were limited. During the initial site planning, four (4) potential designs and loop track alignments were identified within the preferred site to the south of the existing facility (i.e., direct adjacency to the existing Adel mill facility loop track infrastructure with direct access to NS mainline) in addition to a “no build” alternative. These four (4) designs and loop track alignments were considered primarily due to the following qualities: 1) were located adjacent to the existing facility and rail infrastructure, 2) had sufficient acreage / car capacity to accommodate the proposed track expansion project, 3) were not already occupied or developed and were available for purchase, and 4) were zoned accordingly for the planned development.

Table 1 below includes each design / layout alternative, and the acreage of adverse impacts to identified on-site aquatic resources anticipated from each design alternative. The alternative designs were measured against the site selection criteria, which lead to the Final (Chosen) Design Alternative being chosen as the most suitable design to fulfill the purpose and need of the project, while also minimizing and avoiding on-site aquatic resources.

Table 1 - Alternative Designs (1, 2, & 3) vs. Chosen Design Wetland Impacts Summary

Habitat	Alt. Design No. 1	Alt. Design No. 2	Alt. Design No. 3	Final (Chosen) Design
	Permanent Fill Impacts	Permanent Fill Impacts	Permanent Fill Impacts	Permanent Fill Impacts
Forested Wetland	1.51 acres	3.71 acres	3.49 acres	0.98 acres
Emergent Wetland	-	0.02 acres	0.01 acres	0.12 acres
TOTAL WETLAND IMPACTS	1.51 acres	3.73 acres	3.50 acres	1.10 acres

In comparing these potential impacts, estimated wetland mitigation costs were also considered for all design options. Given the greater number of wetlands potentially impacted by the earlier preliminary designs, it was determined that the estimated mitigation costs required for the alternative designs would be more from an economic standpoint than the final (chosen) design alternative. Also, through the final (chosen) design and track layout process, the applicant was able to minimize impacts to and avoid approximately 97% of the wetland habitats identified within the overall assessment area and subject property. Given this, the final design as presented is considered the Least Environmentally Damaging Practicable Alternative (LEDPA) for the planned project.

The Preferred (Chosen) Design Alternative was determined to be the chosen alternative and additional environmental and engineering related studies and planning were initiated to support the planned project.

Site exhibits depicting the alternative design options and chosen design / track alignment within the site are included within **Attachment B** for your use and review.

COMPENSATORY WETLAND MITIGATION

Minimization and avoidance to potentially jurisdictional wetlands were considered in all aspects of the project design while still accomplishing the project purpose. After the attempts to minimize wetland impacts on the site and design were made, the applicant began to explore mitigation options. As previously discussed, it is anticipated that approximately 0.98 acres of forested wetland and 0.12 acres of emergent wetland would be impacted through the construction of the proposed track expansion project.

The anticipated wetland impacts would be considered as unavoidable permanent impacts associated with the development of the site. The applicant proposes to satisfy compensatory mitigation requirements through the purchase of appropriate wetland credits from Cecil Bay Mitigation Bank. As confirmed the USACE – Savannah District in an email dated May 20, 2026, the adverse impacts to 1.10 acres of onsite aquatic resources will result in the applicant being required to purchase 6.64 wetland credits from Cecil Bay MB. We are working with the applicant now to get this transaction completed. We have already provided a copy of the required Statement of Credit Availability (SOCA) from Cecil Bay MB to the USACE. We will provide the required documentation to your office for review once the final mitigation credit transaction is complete, if desired.

Construction stormwater methods have been proposed as a mitigative measure in the design of this project, which would limit the degree of magnitude of the action and its implementation. These methods include the implementation of the construction Storm Water Pollution Prevention Plan (SWPPP) with Best Management Practices (BMPs) to prevent or reduce the discharge of pollutants to waters of the United States. BMPs proposed in the SWPPP may include but are not limited to silt fence, rip-rap pipe end treatment, hay wattles, construction exit, seeding of disturbed areas, wattles, check dam, natural vegetative buffers.

In addition, post-construction storm water measures have been proposed to further reduce pollutants from stormwater. This includes a post-construction stormwater management plan with permanent BMPs. These BMPs may include but are not limited to constructed, permanently grassed swales, rip-rap pipe end treatment, regular maintenance of grassed areas, regular storm water monitoring at primary facility site discharge location, etc.

There are no plans to repair, rehabilitate, or restore the proposed wetland and stream impacts within the project site. To mitigate the proposed wetland and stream impacts, the applicant proposes to purchase the necessary wetland and stream mitigation credits from an approved compensatory mitigation bank. The utilization of a mitigation bank within the same watershed and hydrologic unit code of the project site will support the no net loss of waters. As a result, the

mitigation plan proposed will provide the opportunity to rehabilitate or restore degraded features within the same watershed offsetting the unavoidable impacts to the project.

Following construction, the operation of the proposed facility is intended to remain ongoing for the indefinite future. As such, emphasis will be placed on the reduction or elimination of adverse impacts to adjacent and/or downstream waters that are not included in the planned direct impacts of the proposed project. The applicant will adhere to the requirements of the certification conditions by implementing the post-construction stormwater quality management plan which will include the implementation, monitoring, and maintenance of BMPs to avoid and/or minimize adverse impacts to adjacent habitats and downstream waters. This will ensure that additional impacts will be minimized within the watershed that may otherwise result in adverse effects to other waters of the State.

OTHER PERMIT ACTIONS

The following permit authorizations will be obtained for this project:

- USACE Section 404 Individual Permit (SAS-2016-00016)
- GA DNR - EPD Section 401 Water Quality Certification
- GA DNR - EPD Large Construction Stormwater General NPDES Permit (GAR100001)

STORMWATER MANAGEMENT (DURING & POST-CONSTRUCTION)

These permits will ensure that secondary impacts to water quality will be minimized and that the water quality in adjacent receiving streams will be maintained. As part of the site development plans, the applicant plans to prepare a SWPPP to provide a site-specific description of sediment and erosion controls to help minimize contamination of storm water runoff from potential pollutants, namely sedimentation during construction. The SWPPP will be prepared, as required by GA DNR - EPD, in compliance with the applicable regulations under the Large Construction Stormwater General NPDES Permit GAR100001 and provided to GA DNR - EPD. The implementation of the SWPPP and appropriate BMPs will ensure that the adjacent waters and wetlands within the watershed continue their existing use and maintain water quality standards. Within the SWPPP, potential sources of pollution, which may reasonably be expected to affect the quality of storm water discharges associated with the construction activities, was listed, and included fuels, oils, and other pollutants used in vehicle and equipment operation and maintenance, exposed soils, and soaps and solvents used in vehicle and equipment maintenance during construction. The SWPPP will also describe the implementation of specific BMPs for the proposed project site, which will reduce pollutants in stormwater discharges.

In addition to the Large Construction SWPPP, a post-construction stormwater quality management plan will be prepared to identify potential sources of pollution which may reasonably be expected to affect the quality of stormwater discharges associated from the facility. Stormwater runoff from a site after construction has been completed needs to be managed properly to not pollute the waterbodies downstream of the site. Construction often increases the number of impervious surfaces and therefore it increases the amount of runoff entering nearby streams if not detained. Impervious surfaces include roads, parking lots, rooftops, driveways, sidewalks, compacted soils, and other areas that do not allow water to infiltrate into the ground.

Stormwater running over these surfaces picks up and carries contaminants such as sediment, nutrients, pesticides, metals, organic pollutants, oil and grease, and other contaminants to local waterbodies. Impervious surfaces also increase the volume and velocity of stormwater runoff which increases the frequency and intensity of local flooding and erosion. The objectives of the post-construction stormwater quality management plan are to identify potential sources of pollution and associated risk which may affect the quality of stormwater discharges; describe BMPs and stormwater control measures intended to minimize stormwater pollutants in the facility's runoff; and provide practical guidance for implementing the BMPs and control measures and complying with the terms and conditions of the water quality certification. All of this will help control water pollution associated with stormwater discharges and improve water quality by reducing the number of pollutants contained in stormwater runoff for the site.

The applicant has sufficiently outlined reasonably foreseeable cumulative impacts associated with the proposed project. The implementation of permanent mitigation activities, temporary and permanent erosion, and sediment control BMPs, and enforcement of water quality certification conditions and NPDES limitations and requirements will minimize any potential for adverse cumulative impacts to the existing or classified uses of waters of the State.

Degree of physical, chemical, and biological impacts on waters of the State

Direct physical impacts to the following streams and waters as a result of the project are included in the table below.

Habitat Type	Permanent Impacts	Avoided	Nature of Activity
Emergent Wetland	0.12 acres (fill)	0.08 acres	Fill for construction of planned loop track expansion
Forested Wetland	0.98 acres (fill)	37.48 acres	Fill for construction of planned loop track expansion

The impacts would be minimized through the implementation of BMPs, which would help reduce sediment discharge and erosion off-site and downstream during construction. The post-construction stormwater quality management plan will further support the management of stormwater runoff within the project site. The implementation and maintenance of the BMPs will minimize additional impacts to the physical, chemical, and biological qualities of other wetlands and waters within the watershed. NPDES permits, to include Large Construction Stormwater, will provide the project with conditions to adhere to in order to minimize any adverse impacts to adjacent habitats.

Chemical impacts on waters of the State include potential pollutants discharged from the facility after construction including sediment, nutrients, pesticides, heavy metals, organic pollutants, oil and grease that could affect TSS and COD. The applicant will adhere to the requirements of the Large Construction Stormwater General Permit and post-construction stormwater quality management plan by implementing maintenance operations which will include the implementation, monitoring, and maintenance of BMPs to avoid and/or minimize adverse impacts to adjacent habitats and downstream waters.

Biological impacts will occur to the onsite wetlands that are filled. However, minimal biological impacts downstream are anticipated because of post-construction stormwater quality management as well as effluent limitations, inspection requirements, and other conditions set forth in the Large Construction Stormwater General NPDES permit.

In addition, the proposed compensatory mitigation plan will include purchasing approved wetland credits from an approved mitigation bank to enhance and restore wetlands and streams within the project's watershed. The compensatory mitigation plan will limit the degree of physical impacts to the waters of the State, including wetland and streams. This will provide additional water quality benefits and enhance the ecological functions to benefit these waters' classification within the watershed. The applicant proposes to purchase 6.64 wetland credits from Cecil Bay Mitigation Bank to offset the proposed adverse impacts to 1.10 acres of onsite aquatic resources to fully satisfy the compensatory mitigation requirement and limit impacts to the physical, chemical, and biological makeup of the watershed.

The effect on circulation patterns and water movement on waters of the State

The proposed project would not have any adverse effects on circulation patterns and water movement of waters of the State. The implementation of temporary erosion control measures (during active construction) and the implementation of permanent erosion control measures and management of post-construction storm water management plan (Post-construction) will provide stability to conveyed stormwater runoff, while also reducing runoff rates and sediment transport to downstream waterbodies.

Effects to water movement within the watershed are planned to be limited to minimize any adverse impacts to the existing use of these waters. Current water movement within wetlands and waters of the watershed is influenced primarily by precipitation and runoff from adjacent upland areas. The wetlands on the site are headwater features that originate on the project site. The project site currently provides hydrology to offsite wetlands and waters and will continue to do so. The change in hydrology on the site will not affect waters downstream and will not disconnect waters of the State.

Because of these activities and the use of temporary erosion and sediment control BMPs as well as effluent limitations, inspection requirements, and other conditions set forth in the Large Construction Stormwater General NPDES permit, the proposed activities will not result in quantifiable changes in water circulation patterns and water movement in waters of the state. Provided the applicant complies with the conditions of the required permits, impacts to water circulation patterns or water movement on waters of the state are not anticipated.

RECEIVING WATERS

The project site is located within the Suwannee River Basin. Hutchinson Mill Creek is the nearest named receiving stream for the eastern portions of the proposed project area, and Morrison Creek (FID 2803 - Reach ID GAR031102040501) is the nearest named receiving stream for the western portions of the proposed project area. Utilizing GA DNR - EPD's 305(b) / 303(d) Integrated Report & GIS Database, neither Hutchinson Mill Creek nor Morrison Creek were identified on the Draft 2026 or 2024 Section 305 (b) / 303(d) List of Impaired Water Bodies.

Morrison Creek was identified to have a Total Maximum Daily Loads (TMDLs) completed for bacteria (2011)(Bacteria Indicator Supplement 2022) and DO (2001).

As part of the proposed project construction, BMPs will be utilized to reduce loads from non-point sources such as stormwater runoff. The proposed project will be required to be covered under a Large Construction General Permit. BMPs required by this permit will ensure that stormwater runoff from the development will not contribute to existing water quality impairments. These BMPs will include, but are not limited to, silt fence, rip-rap pipe end treatment, construction exit, seeding of disturbed areas, wattles, check dam, natural vegetative buffers. These measures will be utilized and designed to capture and treat collected stormwater runoff and minimize sediment discharges into waters of the State. Post-construction stormwater treatment will be implemented through a treatment train approach including the use of inlets and storm drains as storm water conveyances to the primary site discharge location. These measures will provide initial and long-term protection from adverse impacts to downstream resources including the receiving waters, Hutchinson Mill Creek & Morrison Creek, and ultimately the Suwannee River.

To adequately comply with water quality criteria regulations, the applicant plans to prepare a SWPPP to provide site-specific descriptions of sediment and erosion controls to help reduce contamination of stormwater runoff from potential pollutants, namely sedimentation. The SWPPP will be prepared, as required by GA DNR -EPD, in compliance with the applicable regulations under the Construction Storm Water General NPDES Permit and provided to GA DNR - EPD under separate cover. Furthermore, the applicant plans to apply for coverage under the necessary Large Construction Stormwater General NPDES Permit to properly protect and minimize any impacts to water quality within the watershed. The permit conditions and requirements will be maintained throughout the life of the project. With this permit, the proposed project would not contribute to further degradation of any existing impairments and would not have any significant adverse effects to water quality.

Further, a post-construction stormwater quality management plan will be prepared with BMPs to control stormwater volume and settle out particulates for pollutant removal. In addition, certification conditions will include effluents limitations of stormwater discharge. Compliance with these permits/certifications will be necessary to ensure compliance with approved TMDLs for this watershed. The implementation of these BMPs should help reduce the sediment load to water bodies within the overall drainage basin and allow the streams to approach stable conditions. This will help provide improved habitat for aquatic life support in the water bodies and will help result in the attainment of water quality standards.

COMPLIANCE HISTORY OF THE APPLICANT


The applicant currently has a good standing with all previously granted permit authorizations granted by GA DNR - EPD and does not have any outstanding compliance issues that would negatively impact the waters of the State. The applicant will work diligently to abide by all permit conditions associated with the issuance of the Water Quality Certification and Large Construction Stormwater General NPDES permit.

ANY OTHER FACTORS DEEMED TO BE NECESSARY BY THE DEPARTMENT TO PROTECT WATER QUALITY

The applicant will work with GA DNR - EPD to address any other factors deemed necessary to protect water quality.

Please accept this information as our response to the requested information regarding the planned development. As always, we appreciate your assistance in this matter. If you have any further questions or need any additional information, please let us know.

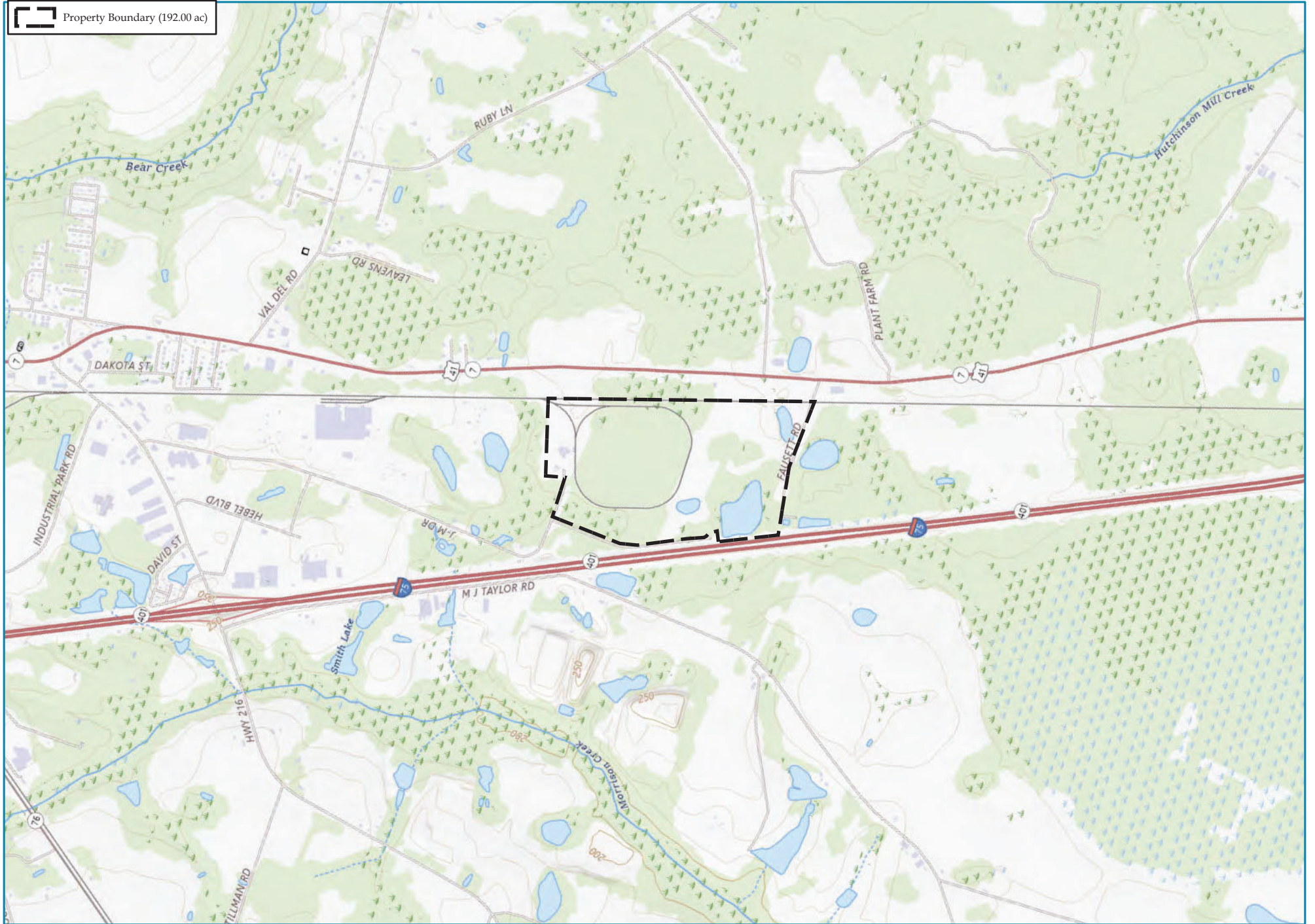
Sincerely,

A handwritten signature in black ink, appearing to read "Ryan Odom". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ryan Odom
Environmental Coordinator
Headwaters, Inc.

RMO/
Attachments

 Property Boundary (192.00 ac)



BASEMAP:	USCS Cecil (GA) 1:24,000 Quadrangle Basemap
SPATIAL REF:	NAD 1983 2011 StatePlane Georgia West FIPS 1002 F1 US
DATE:	1/9/2026
CREATOR:	JDL
PROJECT #:	



Site Location Map	
Wayne - Sanderson Farms	
Adel, Georgia	
Cook County, Georgia	



HEADWATERS
www.headwaters-inc.com



REMARKS:
 ISSUED FOR REVIEW
 NOT FOR CONSTRUCTION
 STEVEN W. TOOMBS
 GA REGISTRATION NO. 044153



REV	ITEM	BY	DATE
A	ISSUED FOR COMMENT	FJA	12-19-25
B	ISSUED FOR COMMENT - CONCEPTUAL LAYOUT	FJA	01-07-26

REVISIONS		BY	DATE
A	ISSUED FOR COMMENT	FJA	12-19-25
B	ISSUED FOR COMMENT - CONCEPTUAL LAYOUT	FJA	01-07-26

FOSTER, JONES & ASSOCIATES, INC.
 ENGINEERING AND CONSTRUCTION MANAGEMENT
 120 SOLLETTA DRIVE, SUITE C MADISON, MS 39110
 (601) 898-1404
 JOB # 24-077.00

COMPANY	WAYNE SANDERSON	PROJECT	LOOP TRACK EXPANSION
LOCATION	ADEL, GA	DRAWING TITLE	OPTION 4A
CAD FILE	ADEL-CONCEPT-BASE.DWG	DRAWING NO.	CON-24-077-14
DRAWN BY	FJA	DATE DRAWN	12-19-25
REV.			B

