

Exhibit FF. Neame Industrial Site Wetlands Delineation Report





Neame Industrial Site Wetland Delineation Report

WETLAND DELINEATION REPORT



NEAME INDUSTRIAL SITE

U.S. HIGHWAY 171 (LAKE CHARLES HIGHWAY) ROSEPINE, LOUISIANA 70121

ECS PROJECT NO. 49:25013

FOR: LOUISIANA CENTRAL

FEBRUARY 5, 2025





Geotechnical • Construction Materials • Environmental • Facilities

February 5, 2025

Mr. Lafe Jones Louisiana Central 1302 Murray Street Alexandria, Louisiana, 71301

ECS Project No. 49:25013

Reference: Waters of the U.S. Delineation Report, Neame Industrial Site, U.S. Highway 171 (Lake Charles Highway), Rosepine, Vernon Louisiana

Dear Mr. Jones:

ECS Southeast, LLC (ECS) is pleased submit this report of the Waters of the U.S. (WOUS) services for the above-referenced site. ECS services were provided in general accordance with ECS Proposal No. 49:48222P authorized on January 16, 2025 and generally meets the requirements of the 1987 U.S. Army Corps of Engineers (USACE) Wetlands Delineation Manual and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region, Version 2.0 dated November 2010. *Based on our field reconnaissance, potential WOTUS are present onsite*.

If there are questions regarding this report, or a need for further information, please contact the undersigned.

ECS Southeast, LLC

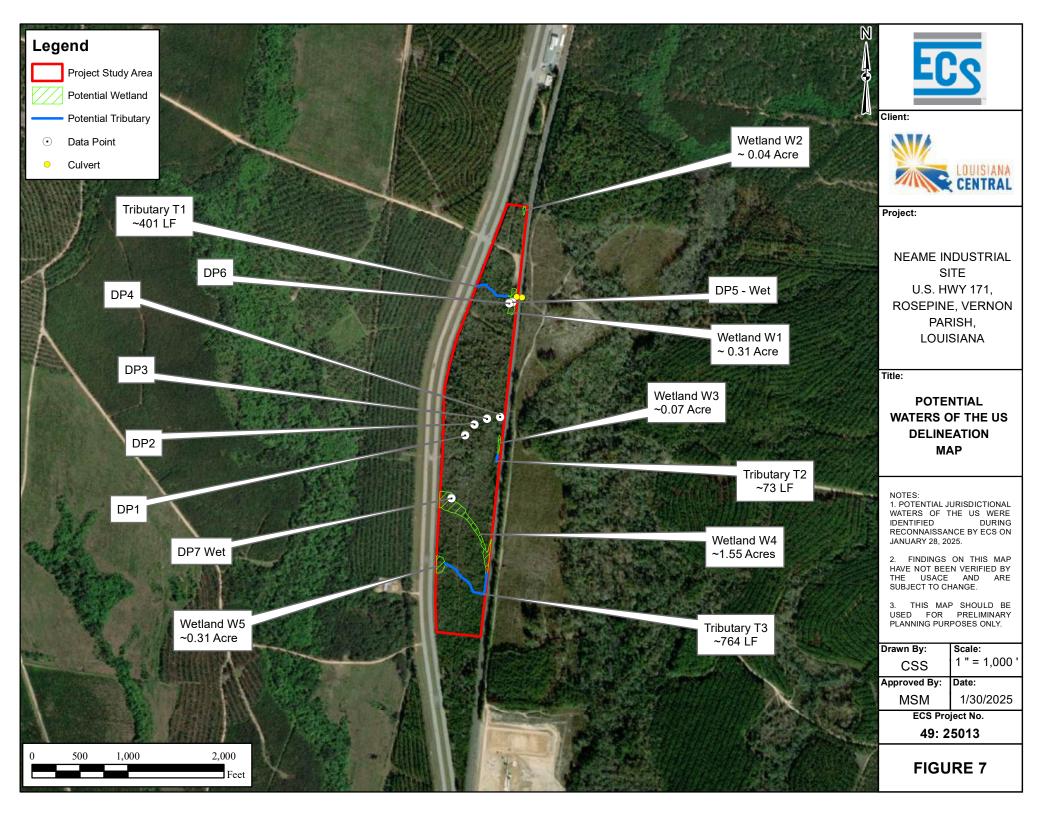
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EXECUTIVE SUMMARY

ECS Southeast, LLP was contracted by Louisiana Central to provide wetland delineation and United States Army Corps of Engineers (USACE) jurisdictional determination services for an approximate 53.7-acre site located along US Highway 171 (Lake Charles Highway) Rosepine, Vernon Parish, Louisiana. The findings of the potential Waters of the United States (WOTUS) delineation are based on ECS' professional judgment and application of the technical criteria presented in the 1987 USACE Wetlands Delineation Manual and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region, Version 2.0 dated November 2010.

Five potentially jurisdictional wetland areas totaling approximately 2.28 acres, and three potential non-wetland WOTUS features totaling approximately 1,238 linear feet were identified and delineated within the PSA. ECS examined field conditions during the site visit to establish downstream hydrologic connectivity to an off-site jurisdictional stream (Clear Creek), mapped east of the PSA. No direct hydrologic connection (i.e., culvert) was observed between Tributary T3, and Wetlands W4 and W5 to offsite downstream waters. These conditions also apply to Tributary T2 and Wetland W3. Recently placed railroad ballast may obscure a culverted hydrologic connection to the above referenced features and downstream waters. Should it be established that Tributary 2, Tributary T3, and Wetlands W3, W4, and W5 are not hydrologically connected to downstream waters, these features would be considered isolated and not federally regulated features. This conclusion is based upon the current definition of Waters of the U.S. Limits of potential tributaries and wetlands, and jurisdictional connection to downstream Waters would need to be confirmed with the USACE through the Jurisdictional Determination Verification process. The locations and boundaries of the potentially jurisdictional wetland areas and non-wetland WOTUS features are presented on the attached Potential Waters of the U.S. Delineation Map (Appendix I, Figure 7).





1.0 INTRODUCTION

This report presents the findings of a wetland delineation study conducted by ECS Southeast, LLC (ECS) for Louisiana Central at the Neame Industrial Site located at U.S. Highway 171 (Lake Charles Highway), Rosepine, Vernon, Louisiana (30.979162°, -93.283225°) as shown on the Site Location Map (Appendix I, Figure 1). The site, also referred to as the Project Study Area (PSA) throughout this report, consists of an approximate 53.7-acre portion of two parcels totaling approximately 65.75 acres. According to the Vernon Geographic Information System (GIS) website, the Parcel Identification Numbers (PINs) are: 0405884924A (64.8 acres), and 0409180000 (0.95 acres) (65.75 acres). The site currently consists of wooded land. Surrounding areas consist of wooded land, fields, U.S. Highway 171 (Lake Charles Highway), and a railroad track. The purpose of this study was to identify and delineate potential WOTUS (or Waters) within the project study area (PSA).

Wetlands are defined by the United States Army Corps of Engineers (USACE) and the United States Environmental Protection Agency (EPA) as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances, do support a prevalence of vegetation typically adapted for life in saturated soil conditions." In order for an area to be classified as wetland, hydrophytic vegetation, hydric soils, and wetland hydrology indicators must be present described in the 1987 "Corps of Engineers Wetlands Delineation Manual" and the Appropriate Regional Supplement.

2.0 METHODOLOGY

The findings of the WOTUS delineation is based on ECS' professional judgment and application of the technical criteria presented in the 1987 USACE Wetlands Delineation Manual and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region, Version 2.0 dated November.

ECS completed the following tasks to identify and delineate potentially jurisdictional WOTUS boundaries onsite:

2.1 Literature Review

ECS reviewed supporting information from publicly-available databases to identify possible ecological effects the project may have on potential state- and/or federally-jurisdictional water resources. During the desktop review, ECS documented relevant, site-specific details (e.g., topographic characteristics, soil composition, recent precipitation, level of disturbance, plant community structure, etc.) and integrated the obtained information with the onsite delineation effort.

2.2 Methodology for Wetland Delineation

Wetland boundaries were delineated using the routine onsite determination method described in the USACE Manual and Regional Supplement, in conjunction with the Atlantic and Gulf Coastal Plain 2020 Regional Wetland Plant List and the USDA Soil Survey.



ECS performed onsite wetland delineations as described above. First, site hydrology was observed and the plant community within the data plot was characterized. The dominant plant species within each community were then identified, and it was determined whether or not hydrophytic (wetland) plants dominated the plant community. The USFWS has defined five wetland plant indicator categories including:

- Obligate wetland (OBL) has >99% probability of occurring in wetlands
- Facultative wetland (FACW) has 66% to 99% chance of occurring in wetlands
- Facultative (FAC) has 33% to 66% chance of occurring in wetlands
- Facultative upland (FACU) has 1 to 33% chance of occurring in wetlands
- Upland (UPL) has <1% chance of occurring in wetlands
- No Indicator (NI) no wetland indicator for the specified species, considered UPL

Plants identified as OBL, FACW, or FAC are considered wetland plants (or hydrophytes) by USACE.

In areas determined to have hydrophytic vegetation and potential wetland hydrology, an approximately 16-24 inch hand auger soil boring or shovel test pit was completed to determine if hydric soils were present. The soil boring was also inspected to determine if indicators of wetland hydrology (inundation, soil saturation, etc.) were present.

Once an area is determined to be a wetland, further testing was performed to locate the wetland/ upland (non-wetland) boundary. A second soil data point was completed in the upland area to document non-wetland conditions. Wetland boundaries were marked with consecutively numbered surveyor's ribbon flags.

Data forms specified in the Regional Supplement were completed for each wetland and non-wetland soil data point location. The data forms recorded the vegetation, soils, and hydrology observations used in making the wetland determinations.

2.3 Methodology for Delineating Streams

During the field investigation for wetlands, ECS examined features onsite that could be considered jurisdictional streams by state and federal regulatory agencies. ECS used field indicators such as flow, substrate composition, presence/absence of defined bed and banks, origin of hydrologic source, presence/absence of vegetation in the stream channel, and composition and relative abundance of resident benthic macroinvertebrates to classify onsite streams into three stream types: ephemeral, intermittent, and perennial.

RGL No. 05-05 provides guidance on identifying physical indicators of Ordinary High Water Mark (OHWM) as defined in 33 CFR Sections 328.3(e) and 329.11(a)(1) and discusses implementation of other appropriate means that consider the characteristics of the surrounding areas to establish the lateral limits of jurisdiction over tidal and non-tidal waters. Per RGL No. 05-05, "the lateral limits of jurisdiction over non-tidal water bodies extend to the [OHWM], in the absence of adjacent wetlands. When adjacent wetlands are present, CWA jurisdiction extends beyond the OHWM to the limits of the adjacent wetlands".



3.0 FINDINGS

3.1 Literature Review

ECS professionals reviewed the U.S. Geological Survey (USGS) Topographic Quadrangle Map, U.S. Department of Agriculture Natural Resource Conservation Service (USDA-NRCS) Web Soil Survey, the Soil Data Access (SDA) Hydric Soils List, the Federal Emergency Management Agency (FEMA) Floodplain Mapping Service, U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) Wetlands Mapper, and available aerial photographs to identify potentially jurisdictional Waters of the U.S. (i.e., streams, wetlands, natural ponds, lakes) and available watershed information.

3.1.1 Literature Review Summary

The following is a summary of the available desktop information that was reviewed as part of this study:

- According to the Rosepine, Louisiana USGS Topographic Quadrangle Map dated 1994 (Appendix I, Figure 2), no surface waters are depicted on the PSA. The PSA ranges from approximately 270 to 290 feet above mean sea level (MSL).
- According to the USDA-NRCS Web Soil Survey (Appendix I, Figure 3), the PSA consists of the
 following soil map units: Beauregard fine sandy loam, 1-3% slopes (BaB), Malbis fine sandy
 loam, 1-3% slopes (MaB), Malbis fine sandy loam, 3-5% slopes (MaC), and Ruston fine sandy
 loam, 3-8% slopes. With the exception of RuD, all of the aforementioned mapped soil units
 are listed on the SDA Hydric Soils List for Vernon Parish, Louisiana.
- The USFWS NWI map (Appendix I, Figure 4) does depict wetlands on the PSA. Wetlands identified by the NWI database include: Palustrine, Forested, Broad-Leaved Deciduous, Temporarily Flooded (PFO1A) wetland type. The PSA is located within the Whisky Chitto watershed and is identified as Hydrologic Unit Code (HUC) 08080204.
- The FEMA Flood Insurance Rate Map (FIRM), Panel 22115C0600E, dated March 20, 2018 (Appendix I, Figure 5), indicates the PSA is located in unshaded Zone X, areas deemed to be outside of the 0.2% Annual Chance Flood Hazard.
- ECS reviewed the United States Geological Survey (USGS) Light Detection and Ranging (LiDAR) Digital Elevation Model (DEM) within the PSA (Appendix I, Figure 6). The DEM's, utilizing dark red to light blue shading to depict high to low elevations, respectively, assist with identifying potential wetland areas and non-wetland waters.



3.2 Field Investigation Findings

ECS personnel conducted the field investigation on January 28, 2025. During the reconnaissance, the PSA was observed for evidence of potential ponds, streams, and wetlands. A total of five potentially jurisdictional wetlands (W1 - W5) totaling approximately 2.28 acres, and three potentially jurisdictional streams (Tributaries T1 - T3) totaling approximately 1,238 linear feet (LF) were identified during the site reconnaissance.

The above features were field-located using a Trimble TDC-650 hand-held GPS unit capable of sub-meter accuracy. ECS identified seven potentially jurisdictional features, and two potentially non-jurisdictional features summarized in the table below:

Table 1: Potential WOTUS Summary Table

Feature ID	GPS Coordinates (decimal degrees)	Approximate Acreage	Approximate Square Footage	Approximate Linear Feet
Wetland W1	30.982956°, -93.282260°	0.31	13,504	
Wetland W2	30.985306°, -93.282327°	0.04	1,742	
Wetland W3	30.978630°, -93.282214°	0.07	3,049	
Wetland W4	30.975836°, -93.282556°	1.55	67,518	
Wetland W5	30.974918°, -93.283726°	0.31	13,504	
Tributary T1 (Ephemeral)	30.982938°, -93.283290°			401
Tributary T2 (Ephemeral)	30.977986°, -93.282358°			73
Tributary T3 (Intermittent)	30.974160°, -93.282628°			764
Total		2.28	93,317	1,238

3.2.1 Wetland Summary

ECS observed five potentially jurisdictional wetland areas (W1 - W5) totaling approximately 2.28 acres within the PSA during the field reconnaissance. The wetland areas exhibited a predominance of hydrophytic vegetation, and positive indicators of wetland hydrology, and hydric soils. The wetland areas are depicted on the Potential Waters of the U.S. Delineation Map (Appendix I, Figure 7). Photographs of the wetlands are presented in Appendix II.

3.2.2 Stream Summary

Two potential ephemeral Tributaries (T1 and T2), and one potential intermittent tributary (T3) totaling approximately 1,238 linear feet (LF) were observed within the PSA. The potential tributaries had well-defined bed and bank features, an ordinary high-water mark, minimal to moderate sinuosity, and substrates ranging from silty to small-sized cobbles. Potential Tributary T1 (401 LF) exhibited evidence of flow but was free of flowing/standing water, Tributary T2 (73 LF) exhibited standing water within the channel, and Tributary T3 (764 LF) exhibited flowing water between potential Wetlands W5 and W4. The potential tributaries are depicted on the Potential Waters of the U.S. Delineation Map (Appendix I, Figure 7). Photographs of the streams are presented in Appendix II.

4.0 REGULATORY DISCUSSION

After review of the findings in the report and at the client's request, ECS can coordinate with the USACE to acquire a jurisdictional determination and conduct a field visit, if necessary. The timeline of this process is dependent on the availability of the regulatory agency. ECS recommends receipt of the formal jurisdictional determination letter from the necessary agencies prior to conducting any land-disturbance activities.

Non-wetland WOTUS are regulated by Sections 401 and 404 of the Clean Water Act. State and Federal law dictates that any disturbance to WOTUS must be permitted through the appropriate agencies. If any potential impacts are proposed, we can assist you with permitting options and support to complete the process. As part of the permitting process, we will conduct a preliminary review of state and federal agency records pertaining to Section 7 (Federal Endangered Species Act) and Section 106 (National Historic Preservation Act). If deemed necessary, we can assist you with targeted species surveys and cultural investigations to satisfy the requirements of the Nationwide Permit (NWP), Individual Permit (IP), or General Permit conditions.

Section 404 of the Clean Water Act regulates the discharge of dredge and fill materials into waters of the United States (lakes, rivers, ponds, streams, etc.), including wetlands. Waters of the United States include territorial seas, navigable coastal and inland lakes, rivers, perennial streams, intermittent streams, and wetlands. The EPA and the U.S. Army Corps of Engineers jointly administer the Section 404 program. Section 401 of the Clean Water Act grants each state the authority to approve, condition, or deny any Federal permits that could result in a discharge to State waters. Mitigation and stormwater management plans will be a condition of permits issued for the Site. Buffers may be required adjacent to streams and water bodies. In general, the mitigation requirements and thresholds for Louisiana are 0.5 acre or more of wetland/WOTUS impacts. The mitigation credits may be estimated by linear feet (LF) and acreage, state specific calculation worksheets, or other methods utilized in that state or USACE district.

For impacts to 0.5-acre or more of wetlands/WOTUS, an IP may be required. An IP may also be required to authorize impacts if wetlands and/or streams are located in a floodplain. An IP requires a habitat analysis, alternative site analysis, project justification, plans to avoid and minimize impacts, and a proposed mitigation plan. Depending on the habitat analysis and the extent of impacts, and Environmental Impact Statement may be required by the USACE. An IP allows for a public comment period and the timeline ranges from 4 to 18 months to obtain depending on the conditions that may arise during the USACE review and public comment period.



5.0 WATERSHED CLASSIFICATION/BUFFER REQUIREMENTS

5.1 State Riparian Buffer Requirements

According to the Louisiana Department of Environmental Quality (LDEQ), the PSA occurs in the East Central Louisiana Coast Watershed. To ECS' knowledge, there are no known state-mandated riparian buffer requirements to warrant the protection of adjacent wetlands and riparian areas beyond the limits of construction. However, it is recommended by LDEQ that best management practices outlined in LDEQ's Stormwater Construction General Permit guidelines be employed during construction activities to limit downstream translocation of sediment into adjacent wetlands and riparian areas.

5.2 Local Buffer Requirements

ECS contacted the Vernon Parish Planning Department to determine if mandatory vegetative buffers and/or riparian buffers are required for streams, wetlands, or other waters in Vernon Parish, Louisiana. According to the Vernon Parish Planning Department, there are no additional riparian buffer requirements in addition to the state-recommended practices for general construction and stormwater management.

ECS recommends consultation with a civil engineer to determine if mandatory vegetative buffers and/ or regulated development (impervious surfaces) setbacks are required for the site in addition to those mentioned above.

6.0 CONCLUSIONS

Five potentially jurisdictional wetland areas, totaling approximately 2.28 acres, and three potentially jurisdictional tributaries, totaling approximately 1,238 LF were identified and delineated within the study area. ECS examined field conditions during the site visit to establish downstream hydrologic connectivity to an off-site jurisdictional stream (Clear Creek), mapped east of the PSA. No direct hydrologic connection (i.e., culvert) was observed between Tributary T3, and Wetlands W4 and W5 to offsite downstream waters. These conditions also apply to Tributary T2 and Wetland W3. Recently placed railroad ballast may obscure a culverted hydrologic connection to the above referenced features and downstream waters. Should it be established that Tributary 2, Tributary T3 and Wetlands W3, W4, and W5 are not hydrologically connected to downstream waters, these features would be considered isolated and not federally regulated features. This conclusion is based upon the current definition of Waters of the U.S. Limits of potential tributaries and wetlands, and jurisdictional connection to downstream Waters would need to be confirmed with the USACE through the Jurisdictional Determination Verification process. The locations and boundaries of the potential Waters are illustrated on the attached Potential Waters of the U.S. Delineation Map (Appendix I, Figure 7).

The findings summarized in this report represent our best professional judgment concerning the presence of potential jurisdictional aquatic resources in the PSA at the time of the study. These findings are only to be considered preliminary and are for planning purposes only, as they have

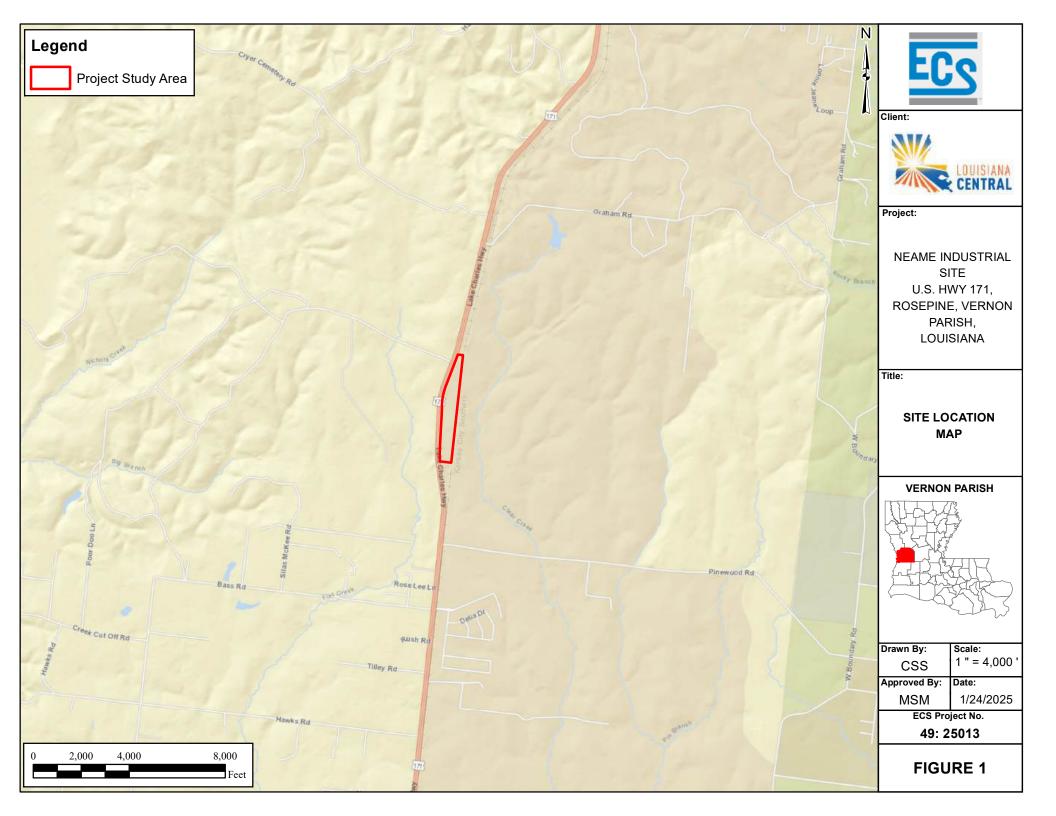


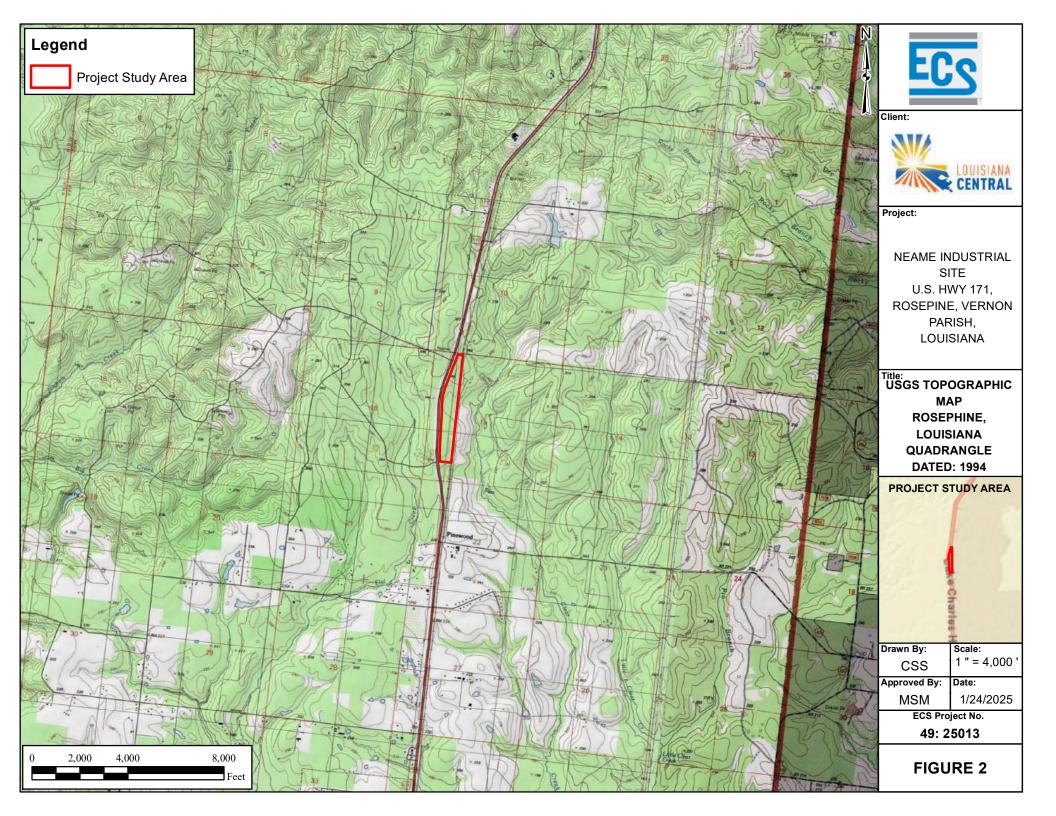
not yet been verified by the regulatory agencies and are, therefore, subject to change pending their review. ECS cannot guarantee that field conditions and/or WOTUS boundaries will not change over time.

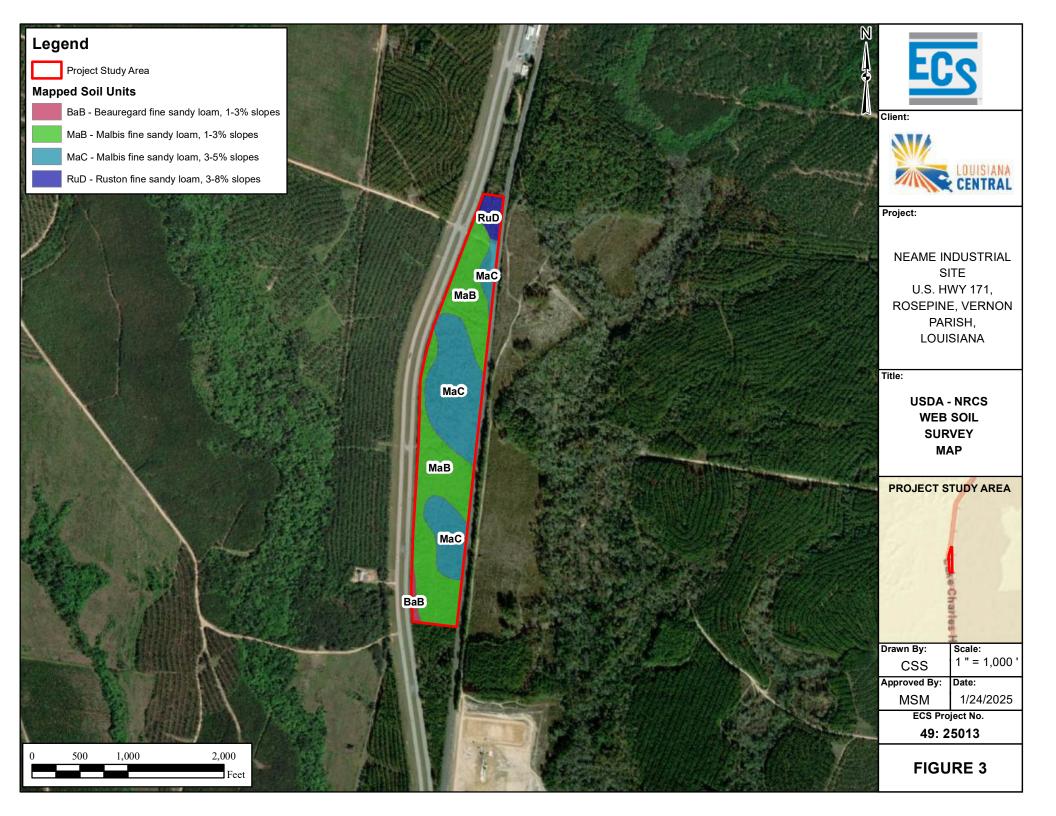
Prior to conducting construction-related activities onsite, ECS recommends requesting a Approved Jurisdictional Determination from the USACE for verification of these results to satisfy the requirements of Section 404 of The Clean Water Act (33 U.S.C. 1344). No earth-disturbing activities should be conducted within the PSA until a USACE Determination has been issued.

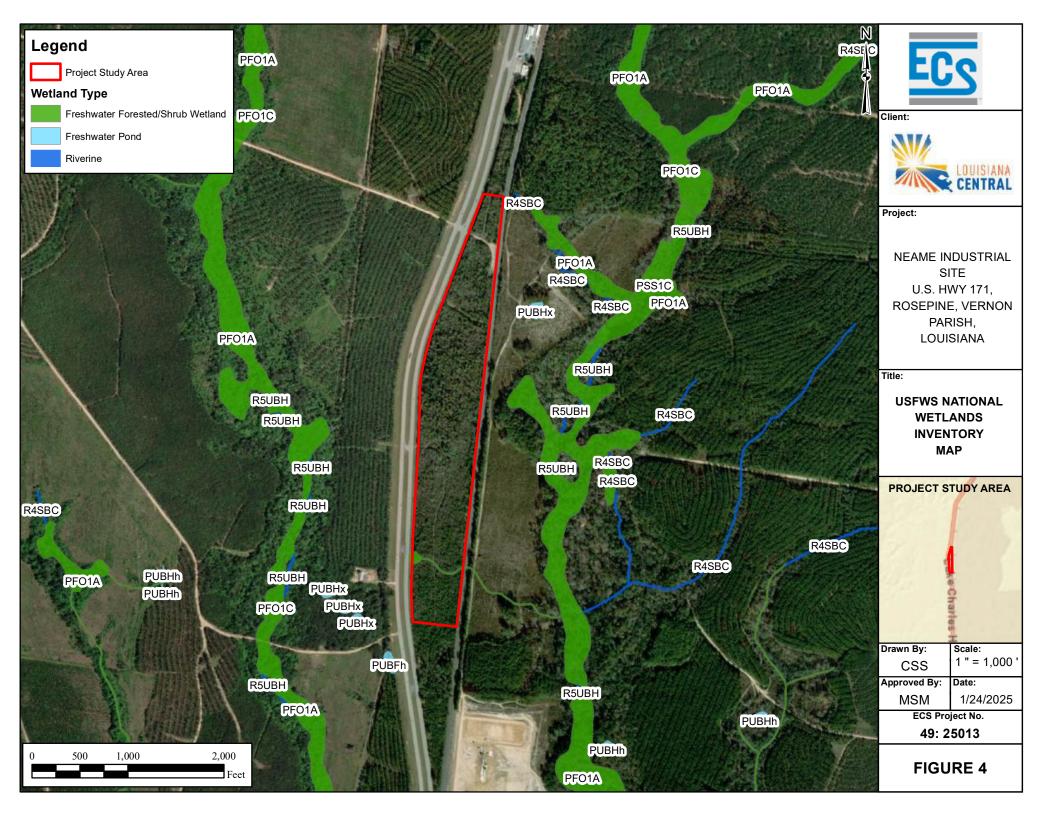


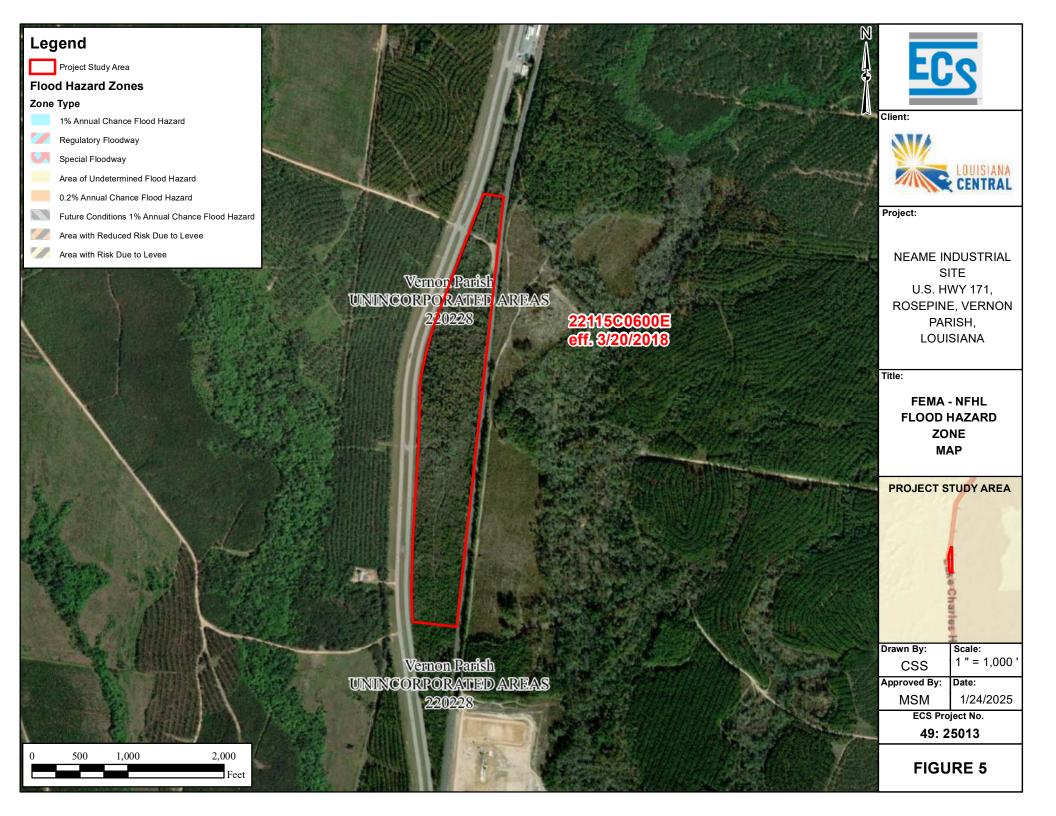
Appendix I: Figures

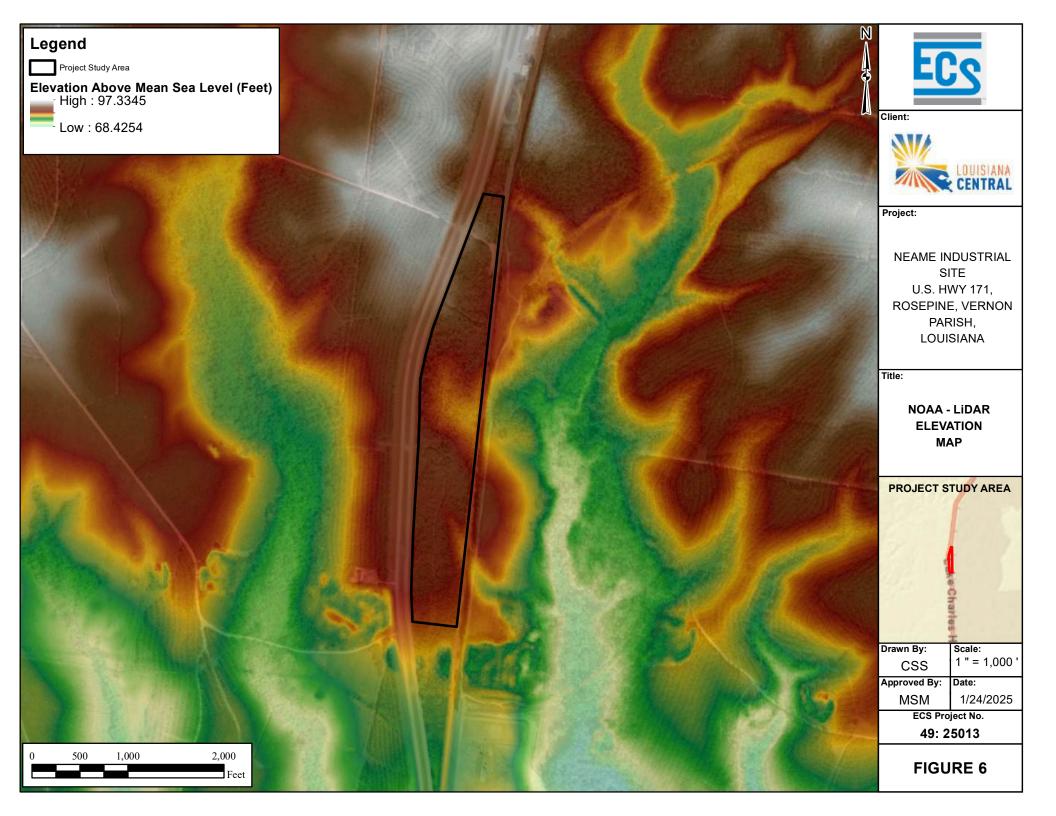


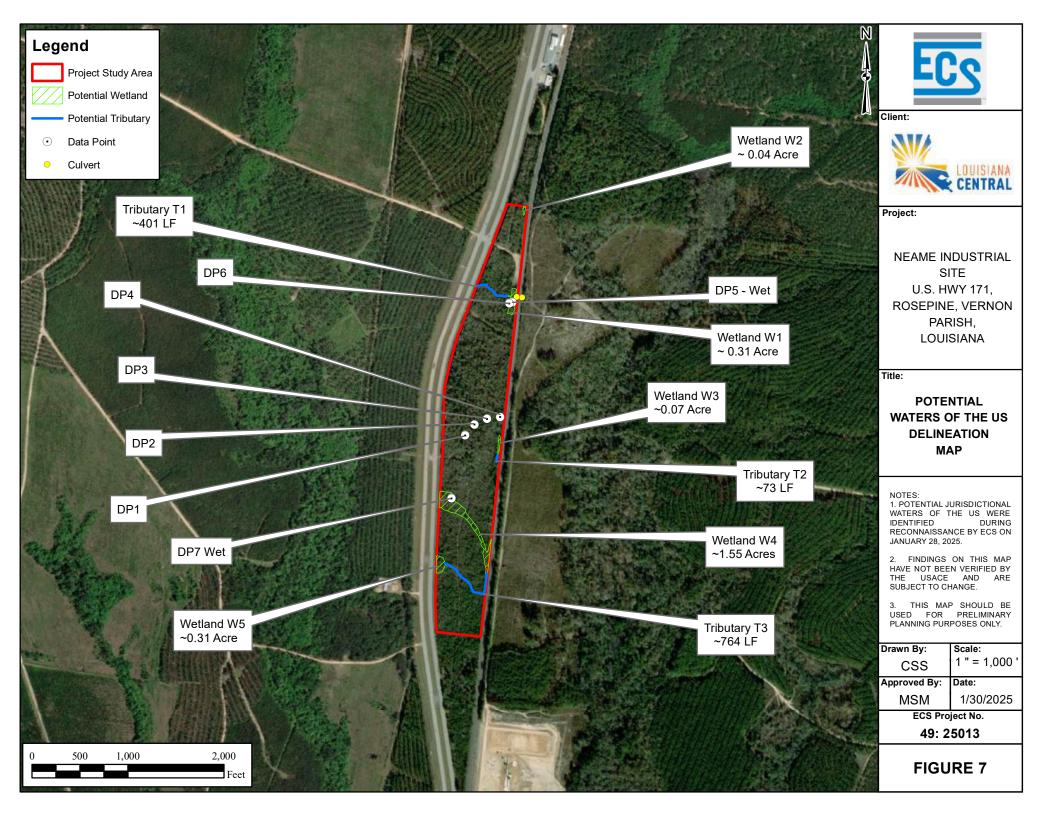
















1 - Soil profile at DP1.



2 - Overview at DP1, facing north.



3 - Overview at DP1, facing east.



4 - Overview at DP1, facing south.



5 - Overview at DP1, facing west.



6 - Soil profile at DP2.



7 - Overview at DP2, facing north.



8 - Overview at DP2, facing east.



9 - Overview at DP2, facing south.



10 - Overview at DP2, facing west.



11 - Soil profile at DP3.



12 - Overview at DP3, facing north.



13 - Overview at DP3, facing east.



14 - Overview at DP3, facing south.



15 - Overview at DP3, facing west.



16 - Soil profile at DP4.



17 - Overview at DP4, facing north.



18 - Overview at DP4, facing east.



19 - Overview at DP4, facing south.



20 - Overview at DP4, facing west.



21 - Soil profile at DP5, Wetland W1.



22 - Overview at DP5, Wetland W1, facing north.



23 - Overview at DP5, Wetland W1, facing east.



24 - Overview at DP5, Wetland W1, facing south.



25 - Overview at DP5, Wetland W1, facing west.



26 - Soil profile at DP6.



27 - Overview at DP6, facing north.



28 - Overview at DP6, facing east.



29 - Overview at DP6, facing south.



30 - Overview at DP6, facing west.



31 - Soil profile at DP7, Wetland W4.



32 - Overview at DP7, Wetland W4, facing north.



33 - Overview at DP7, Wetland W4, facing east.



34 - Overview at DP7, Wetland W4, facing south.



35 - Overview at DP7, Wetland W4, facing west.



36 - Overview at Wetland W2, Facing northeast.



37 - Overview at Wetland W2, Facing southeast.



38 - Overview of Wetland W3, facing north.



39 - Overview of Wetland W4, facing northeast near RR tracks.



40 - Overview of Wetland W4, facing northwest.



41 - Overview of Wetland W5 near US 171, facing southwest.



42 - Overview of Wetland W5 near US 171, facing northwest.



43 - Overview of Tributary T1, facing west.



44 - Overview of Tributary T2 near Wetland W3, facing north.



45 - Overview of Tributary T3, facing southeast.



46 - Overview of Tributary T3, facing northwest.



 ${\bf 47}$ - Overview of Tributary T3 near Wetland W5, facing east.