

Directions: Follow Highway 91 North until the intersection of 2500 North and proceed west for approximately 0.75 miles. Turn left on 600 West. The site is on the right (west) side of 600 West.

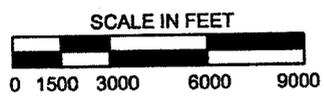


Figure 1. Ballard Industrial Springs Project Vicinity Map.

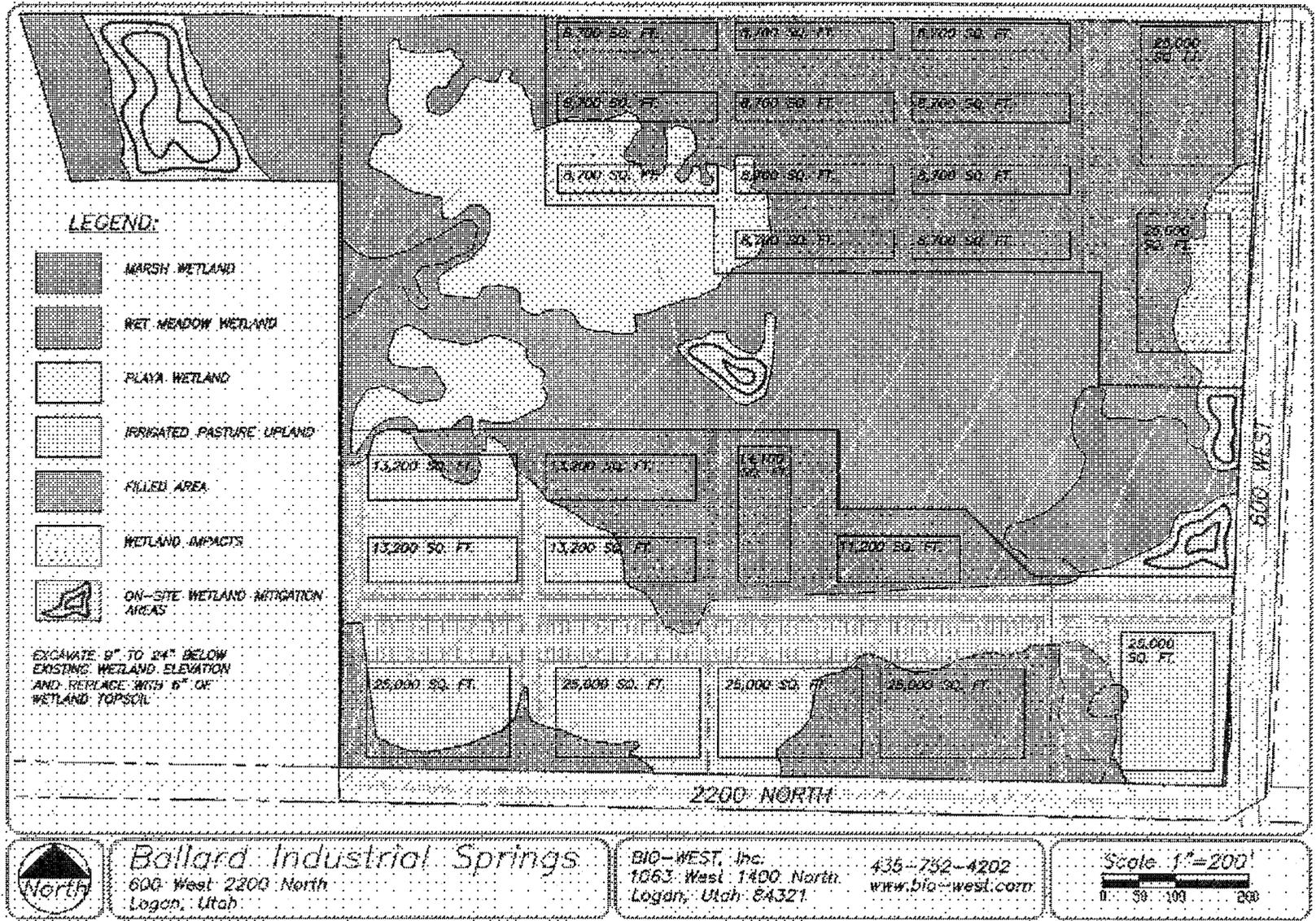
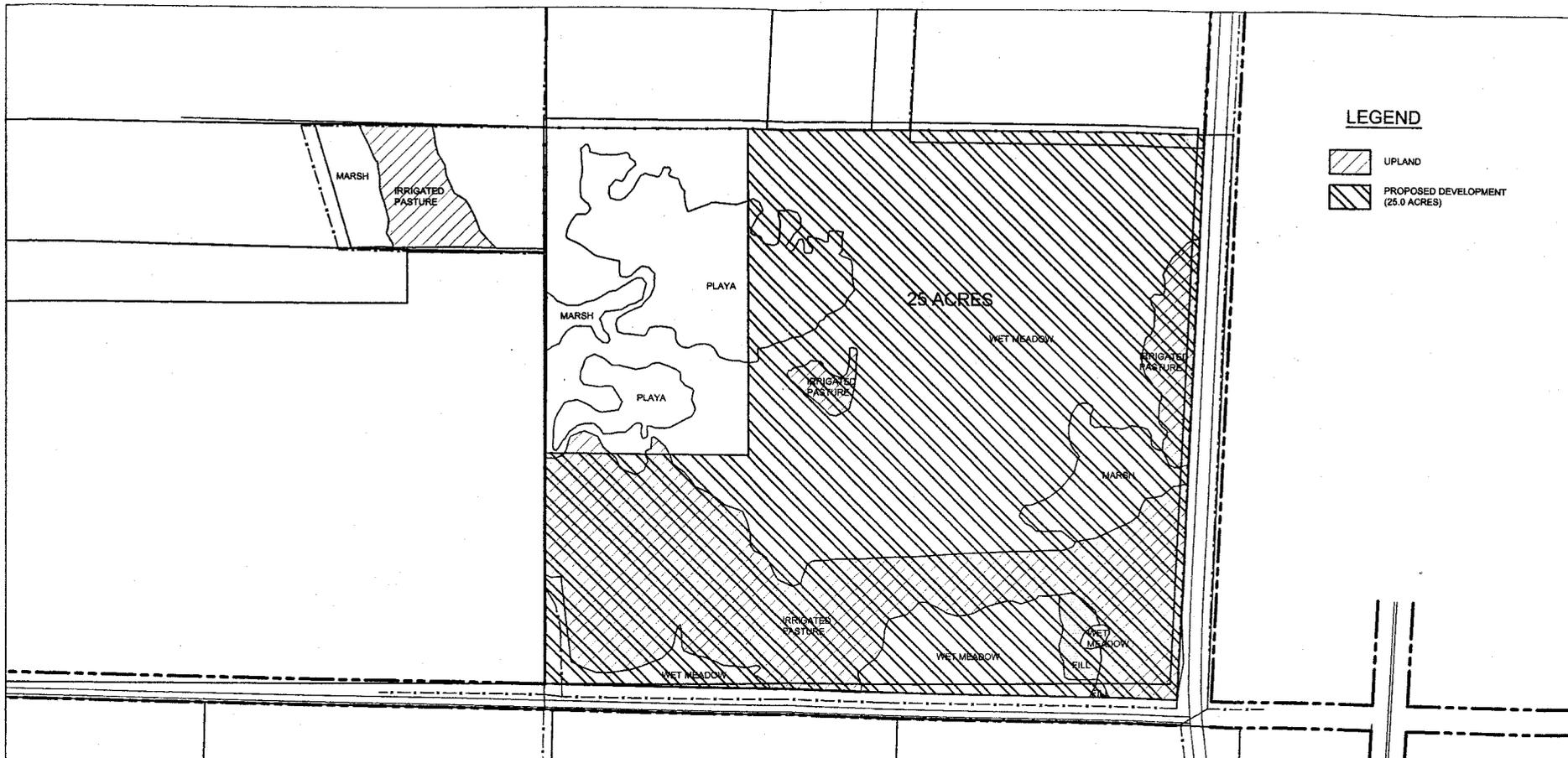


Figure 2. Ballard Industrial Springs Project Wetland Impacts Map.



LEGEND

-  UPLAND
-  PROPOSED DEVELOPMENT (25.0 ACRES)



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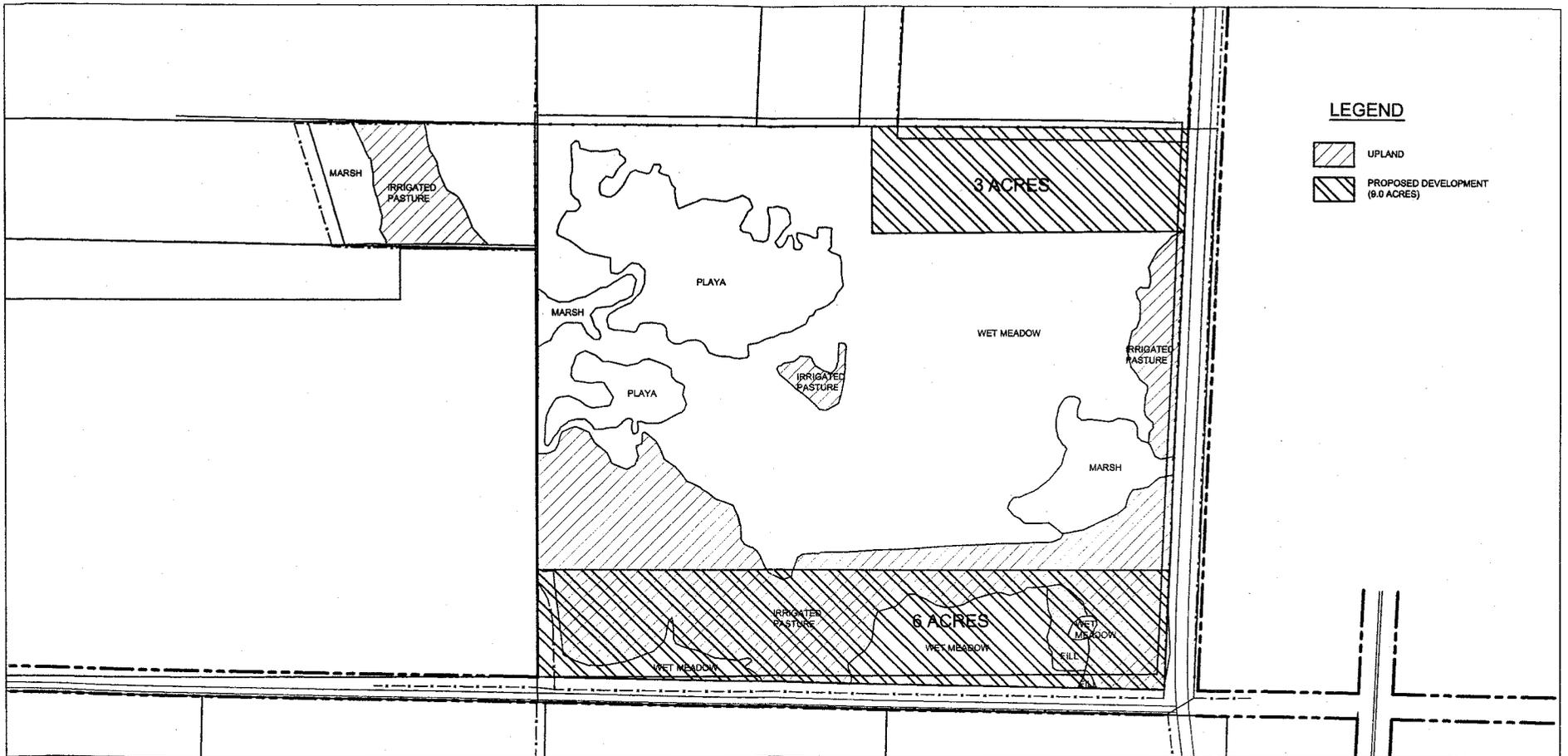
**BALLARD INDUSTRIAL SPRINGS
 LAND DEVELOPMENT SCENARIO 1**

DATE:

01/23/04

SCALE:





LEGEND

-  UPLAND
-  PROPOSED DEVELOPMENT (9.0 ACRES)



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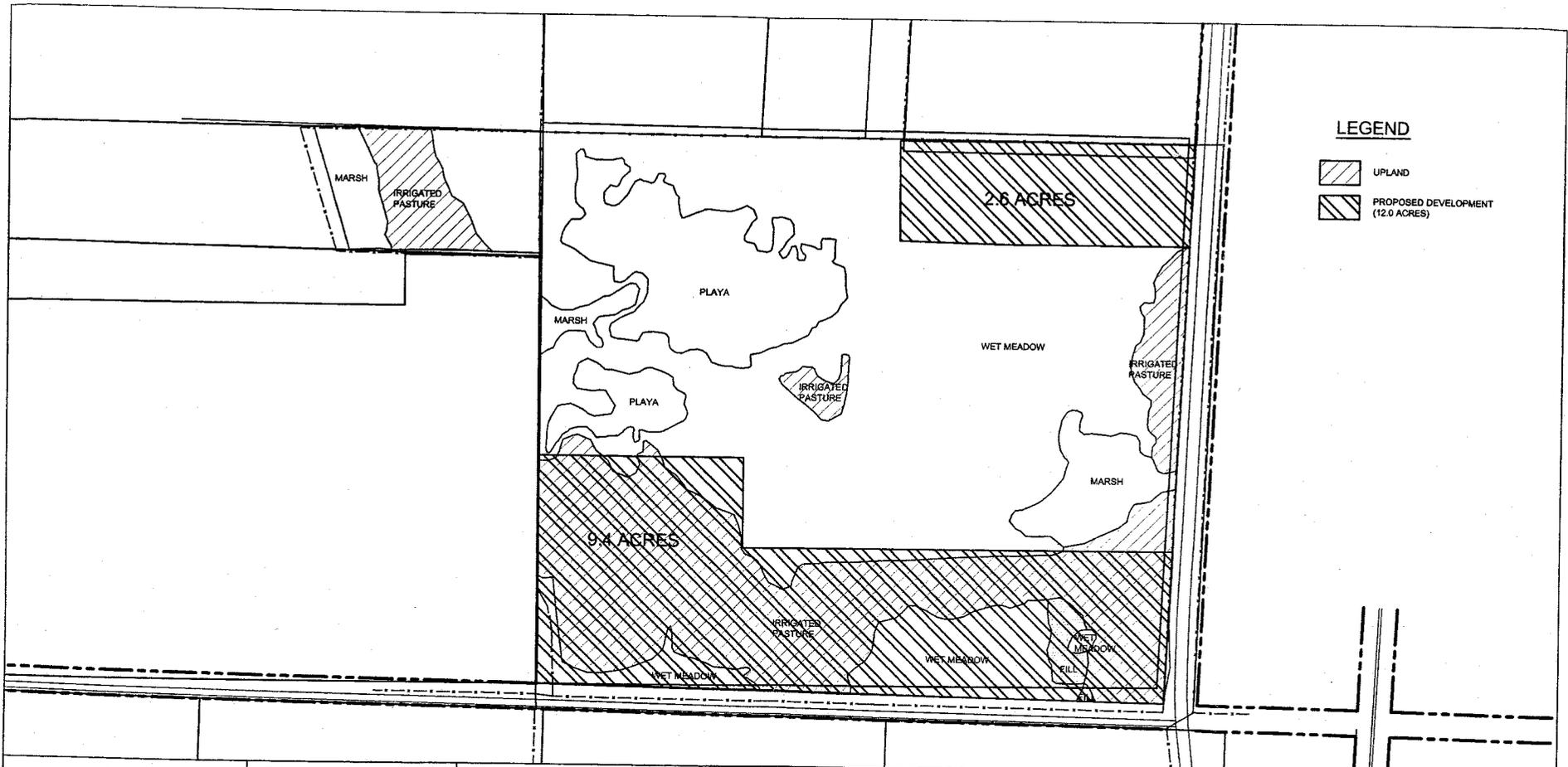
**BALLARD INDUSTRIAL SPRINGS
 LAND DEVELOPMENT SCENARIO 2**

DATE:

01/23/04

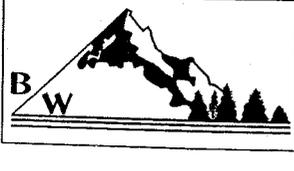
SCALE:





LEGEND

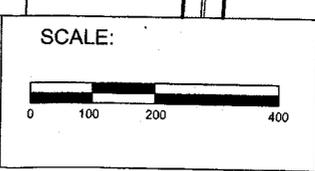
-  UPLAND
-  PROPOSED DEVELOPMENT (12.0 ACRES)

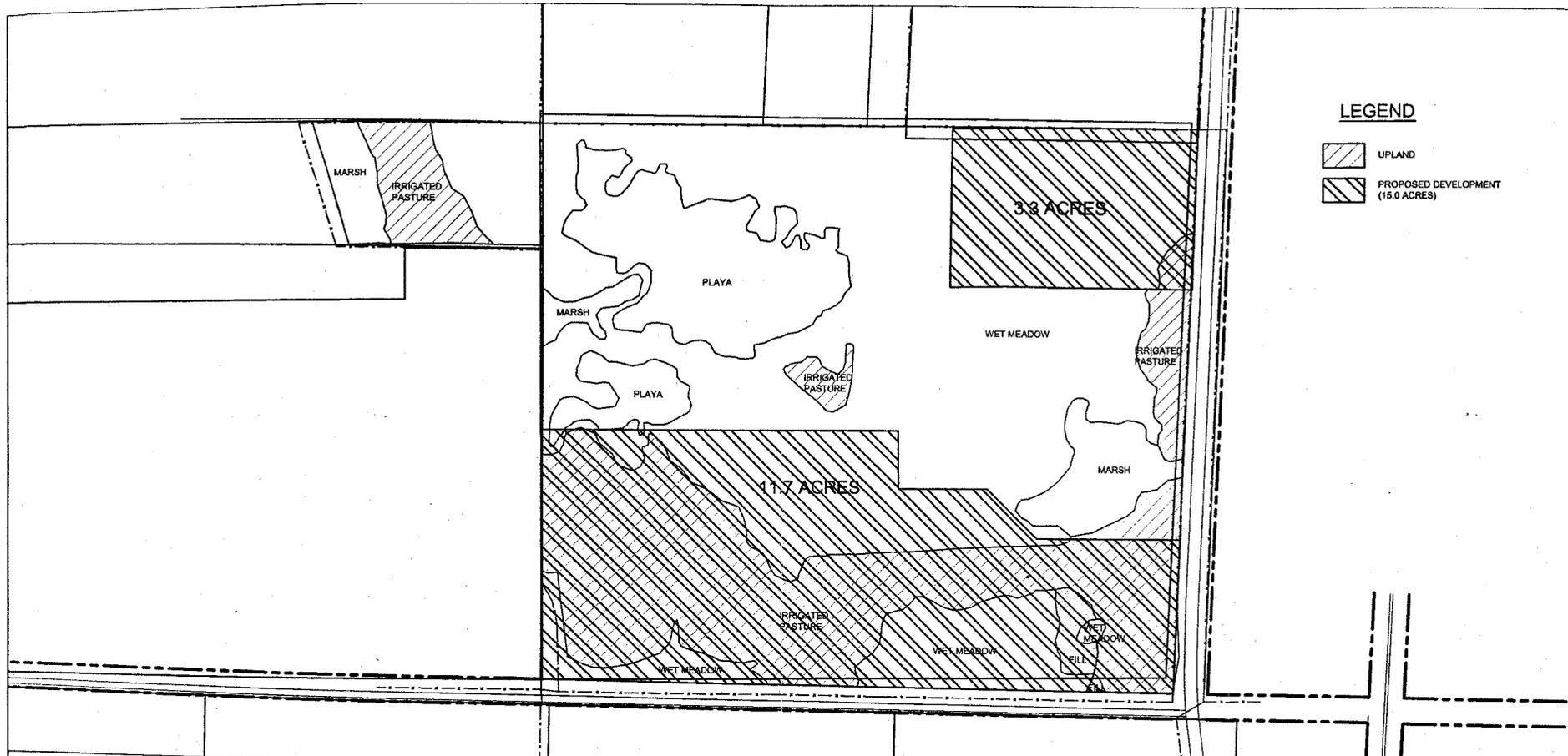


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TITLE:
**BALLARD INDUSTRIAL SPRINGS
 LAND DEVELOPMENT SCENARIO 3**

DATE:
 01/23/04





LEGEND

-  UPLAND
-  PROPOSED DEVELOPMENT (15.0 ACRES)



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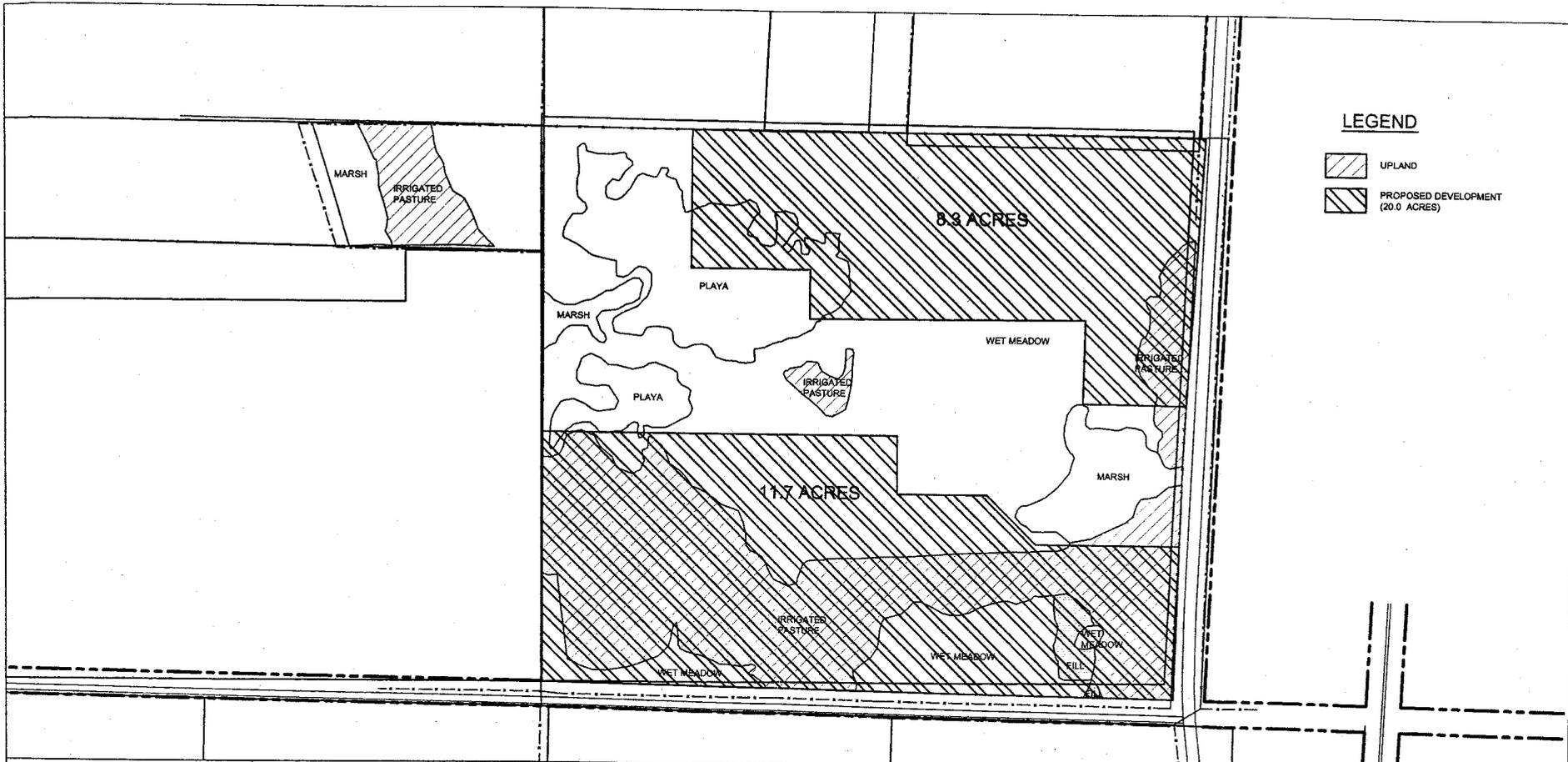
**BALLARD INDUSTRIAL SPRINGS
 LAND DEVELOPMENT SCENARIO 4**

DATE:

01/23/04

SCALE:





LEGEND

-  UPLAND
-  PROPOSED DEVELOPMENT (20.0 ACRES)



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TITLE:

**BALLARD INDUSTRIAL SPRINGS
 LAND DEVELOPMENT SCENARIO 5**

DATE:

01/23/04

SCALE:



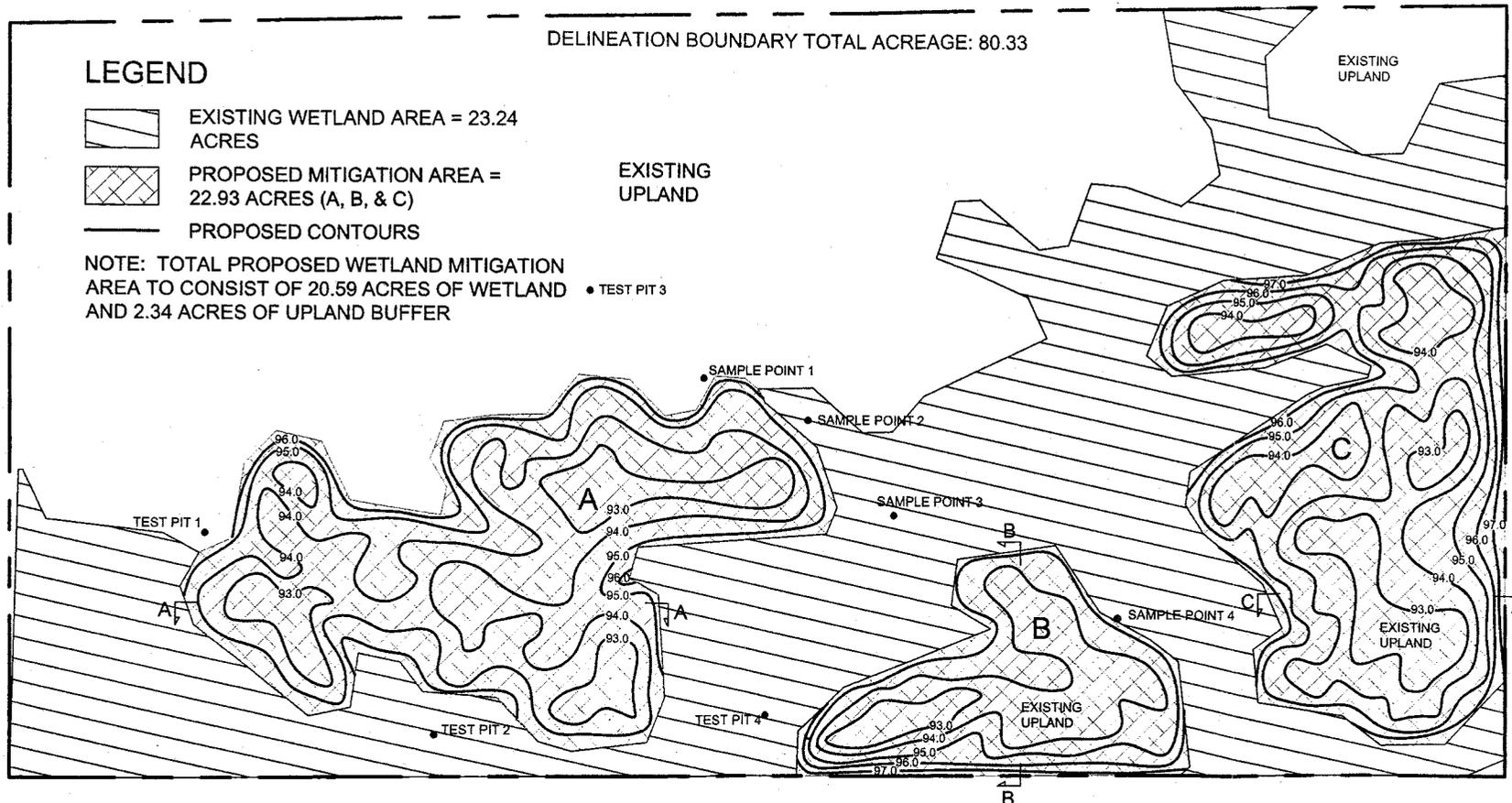
DELINEATION BOUNDARY TOTAL ACREAGE: 80.33

LEGEND

-  EXISTING WETLAND AREA = 23.24 ACRES
-  PROPOSED MITIGATION AREA = 22.93 ACRES (A, B, & C)
-  PROPOSED CONTOURS

NOTE: TOTAL PROPOSED WETLAND MITIGATION AREA TO CONSIST OF 20.59 ACRES OF WETLAND AND 2.34 ACRES OF UPLAND BUFFER

400 NORTH



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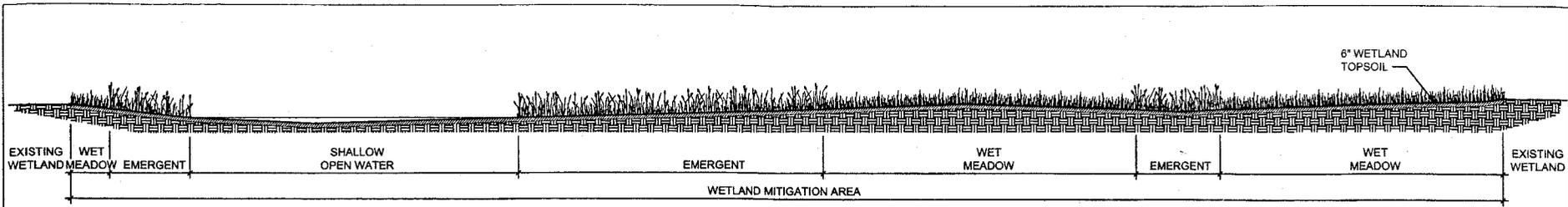
AMALGA PROPERTY WETLAND MITIGATION MAPS

DATE:

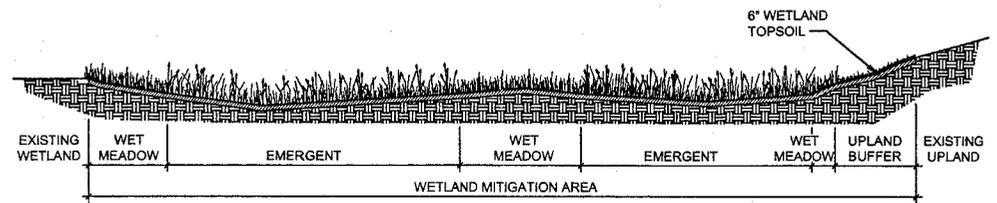
12/29/03

SCALE:

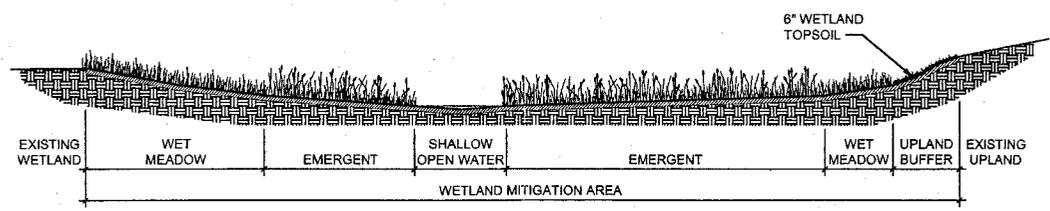




CROSS SECTION A-A
NOT TO SCALE



CROSS SECTION B-B
NOT TO SCALE



CROSS SECTION C-C
NOT TO SCALE



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TITLE:
**AMALGA PROPERTY
WETLAND CROSS SECTIONS**

DATE:
12/29/03

2.1 ALTERNATIVE ANALYSIS

The following presents an alternative analysis describing the procedure of adjusting the scope and design components of the Project to minimize wetland impacts and to develop the least-damaging practicable alternative for the Project. The final project design is a combination of alternatives selected to minimize impacts to various resources and is the most practicable (i.e., the least costly) to develop and construct. Where practicable, the Project avoids the highest-quality wetland areas. Table 1 shows a summary of the alternative Land Development Scenarios and their characteristics. Maps of the five alternative Land Development Scenarios are provided in Appendix B.

Table 1. Summary table describing the Ballard Industrial Springs Project Land Development Scenarios.

LAND DEVELOPMENT SCENARIO	WETLAND IMPACTS (ACRES)	AVAILABLE ON-SITE MITIGATION (ACRES)	OFF-SITE MITIGATION NEEDED (ACRES)	BUILDABLE AREA (ACRES)	TOTAL BUILDING AREA (SQURE FEET)
Scenario 1	17.34	0.80	34.68	25	384,000
Scenario 2	4.91	4.65	0.26	9	158,000
Scenario 3	5.29	1.95	6.68	12	210,000
Scenario 4	8.07	1.81	12.52	15	263,000
Scenario 5	12.69	1.40	22.58	20	349,000

2.1.1 Land Development Scenario 1

The first alternative Mr. Ballard pursued impacted the largest acreage of wetland and required a sizable mitigation area. The buildable area, 384,000 square feet, was sufficient for the planned land use, but the cost for mitigation was too high. This scenario was also rejected by the Corps.

2.1.2 Land Development Scenario 2

The second alternative is meant to save as much wetland on the Property as possible without regard to the building square footage required to make the Project economically feasible. This scenario provides nearly enough on-site wetland mitigation for the wetland disturbances. However, the total buildable area was less than half (169,000 square feet) of that proposed in Scenario 1. For reasons discussed below, Scenario 2 was too costly to be economically viable.

2.1.3 Land Development Scenarios 3-5

Scenarios 3-5 attempt to bridge the gap between minimizing the disturbance of the highest quality wetlands while providing enough buildable acreage for the Project. Land Development Scenario 5 was chosen to be the preferred alternative. Scenario 5 creates a sufficient amount of buildable area but disturbs only marginal-quality wetlands, which are possibly a direct result of agricultural

irrigation. The highest quality wetlands will not only be protected but enhanced as the Project proceeds through on-site wetland mitigation.

The preferred Land Development Scenario requires 20 acres of land to be economically viable for these reasons:

1. Based on the characteristics of other successful storage unit businesses in the area, development of the Project requires a broad layout. Storage units and their access areas must be easily negotiable; large trucks with trailers need sufficient space to maneuver through the aisles of the units. To be economically viable, the storage unit portion of the Project requires a minimum of 200 storage units with 40 to 50-foot aisles between buildings. Therefore, to be efficient and easily understood, the storage units will be built on a grid pattern on a spacious site.
2. Two-storey structures cannot be built on the Property, for a variety of reasons. Two-storey structures are prohibited in this area because of the proximity to the Cache-Logan Airport. Second, two-storey storage units require specialized access equipment, and second-storey units fetch lower rents compared to ground floor units. The proposed mixed uses for the site will require pick up and delivery that are best suited for ground-level access.
3. To provide for adequate parking, storage, turning radiuses, driveways, fire truck turn-arounds, building pads, landscape screening, fences, access from major roads, and future growth, 20 acres will need to be developed.
4. Mixed uses will need to be separated and screened. Boat storage units, light industry development, and office buildings have different development considerations. The office building portion of the Project will need frontage on main roads, while not being disturbed by noise or visual impacts. Storage units will need wider drives and parking lanes than the office buildings. Also, the entries to both complexes should be separate. Light industry may need outside storage, security, and pick-up/drop-off areas that will involve machinery.

2.2 REGULATORY REQUIREMENTS

Special aquatic sites, including wetlands, are regulated as Waters of the United States by the Federal Government mainly through the Corps in accordance with Section 404 of the Clean Water Act. Section 404 provides the Corps with authority to regulate certain activities involving the excavation and/or discharge of dredged or fill materials into special aquatic sites, including wetlands, as well as other Waters of the United States (e.g., streams, rivers, and lakes). The Clean Water Act also grants the U.S. Environmental Protection Agency (EPA) the authority to review and veto the Corps decisions regarding the issuance of permits under the Section 404 Regulatory Program. Thus, Federal wetland regulation is shared jointly by the EPA and the Corps.

The EPA defines special aquatic sites as geographic areas, large and small, possessing special ecological characteristics of productivity, habitat, wildlife protection, and other important and easily disrupted and ecological values (EPA 40 CFR 230.3). Special aquatic sites include wetlands, mudflats, vegetated shallows, riffle and pool complexes, coral reefs, and sanctuaries and refuges.

Both the EPA and the Corps define wetlands as areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions (EPA 40 CFR 230.3, Corps 33 CFR 328.3). Generally, the Corps defines normal circumstances as the soil and hydrological conditions that are normally present in an area, without regard to whether the vegetation has been removed or otherwise disturbed.

The Corps uses a three-parameter approach to identify jurisdictional wetlands (Environmental Laboratory 1987). Under normal circumstances, an area must include all of the following to be designated as a jurisdictional wetland:

- the presence of water (hydrologic source) creating saturated soil conditions during a significant portion of the growing season,
- underlying substrates that exhibit hydric soil conditions, and
- a plant community dominated by hydrophytic vegetation.

Typically, the presence of these three wetland parameters is mandatory for the designation of jurisdictional wetlands. However, if an area has been disturbed, resulting in the obliteration of one or more of the wetland parameters, the presence of wetland hydrology and either hydric soils or hydrophytic vegetation usually is sufficient to identify jurisdictional wetlands. In addition, certain naturally occurring "problem areas," which are regulated by the Corps as jurisdictional wetlands, may lack evidence of one of the wetland parameters (Environmental Laboratory 1987). The Federal Clean Water Act also requires any Section 404 Permit applicant for discharge into Waters of the United States to obtain a certification from the State specifying that the proposed activity will maintain water quality standards established by the State. The State must issue its certification prior to the Corps' issuance of a Section 404 Permit. The Utah Department of Environmental Quality, Division of Water Quality (DWQ) requires a Storm Water Discharge Permit for the Project and a site-specific stormwater pollution prevention plan is being developed as part of the detailed plans.

Also, in the State of Utah, the Utah State Engineer's Office requires a State Stream Alteration Permit for activities that alter natural stream channels. The information provided in this document will also facilitate the review for this permit application.

The Project proponents are seeking approval of a Joint Permit for Sections 404 (Corps) and 10 (Utah State Engineer's Office) for natural stream channels under an individual permit.