

**CESAS Form 19 Support Documentation**  
**City of Savannah Riverwalk Connector**  
**Chatham County, Georgia**

The following information is submitted as support documentation in association with the attached application requesting authorization to impact waters of the U.S. pursuant to Section 10 of the Rivers and Harbors Act of 1899 and the Coastal Marshlands Protection Act of 1970 pursuant to the Official Code of Georgia Annotated, Part 12-5-286 (OCGA).

**1.0 Project Description**

The City of Savannah (applicant), is proposing to connect the existing sections of Savannah Riverwalk in front of the Marriott Hotel on the Savannah River. The project site is located at the eastern end of Savannah's Riverfront Plaza northeast of the intersection of Bay Street, River Street, and General McIntosh Boulevard. The site is located entirely within the Lower Savannah River Watershed (HUC 03060109), and the center coordinates of the site are 32.07908° N, -81.08097° W. The project includes construction of a pile supported riverwalk platform on the channelward side of the Marriott Hotel in order to bridge the gap between the existing sections of riverwalk located east and west of the hotel. No floats, bulkheads, fill, dredging, or other bank stabilization is proposed.

**2.0 Site Conditions**

All of the proposed waterside activities are located over open water. The open water habitat is generally 5 – 15 feet deep within the proposed footprint of the riverwalk connector. The area landward of the proposed riverwalk connector consists of the existing hotel and a pile supported brick plaza in front of the hotel. No vegetated salt marsh is located within or adjacent to the project area. Adjacent land uses consist of upstream and downstream commercial and industrial facilities with bank armoring and waterside facilities similar to those proposed for this project.

**1.2 Proposed Project**

The proposed project will connect two sections of the Savannah Riverwalk. Currently, the riverwalk begins near the terminus of Barnard Street, over 3,900 feet to the west of the project site. It extends along the Savannah River and terminates at the proposed project's western boundary. The riverwalk provides a unique opportunity for the public to enjoy Savannah's river frontage. In downtown Savannah, River Street is the main social gathering point and attraction for both tourists and residents where various antique shops, boutiques, restaurants, pubs, and hotels can be enjoyed. River Street has retained the history and heritage associated with historic downtown Savannah while promoting the economic and social interests of the city. Today, River Street is the number one tourist destination in Savannah and draws over 12 million visitors each year including the annual St. Patrick's Day festivities and various other City of Savannah festivals and celebrations. Patrons visit the shops and restaurants located on River Street all while enjoying the view of the Savannah River from the riverwalk which extends the entire length of the street.

At the project's eastern boundary is the proposed Savannah River Landing development. This master planned development will provide additional commercial and residential opportunities thereby extending the Riverfront Plaza to this section of town. The entire +/- 2,050 linear feet of river frontage at the Savannah River Landing contains a pile supported riverwalk similar to what is proposed for the project. It also has approximately 480 feet of floating dock space to service the development.

The proposed project will bridge the gap between the main section of riverwalk located west of the site and the section of riverwalk along the Savannah River Landing property. The project will benefit the public by providing additional waterfront enjoyment opportunities as well as facilitating pedestrian travel along the entire Riverfront Plaza.

**1.3 Proposed Activities in Jurisdiction**

The proposed riverwalk connector will consist of a pile supported concrete deck located over the riverwalk. The concrete deck will be topped with brick pavers to match the design of the upstream and downstream

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sections of walkway. The walkway will generally be 12 feet wide with the exception of a wider section directly in front of the Marriott Hotel which will provide connectivity / access between the riverwalk and the hotel. At the project's western boundary, a 12' x 172' (2,064 sq. ft.) section of new elevated riverwalk will extend eastward where it will connect to a wider 17' x 115' (1,955 sq. ft.) section in front of the Marriott. East of the Marriott, another 12' x 198' (2,376 sq. ft.) section of walkway will extend to the project's eastern boundary where it will turn 90° to the south for approximately 66' (792 sq. ft) to connect to the existing Riverwalk in front of Savannah River Landing. Please note that all measurements stated above were rounded up. All structures over the waterway will total 7,187 square feet (0.165 acre). The deck will be mounted on 20" pre-stressed concrete piles, and it may contain planters, landscaping, railing, , electrical, and lighting to conform with the existing riverwalk concept. Water may also be provided but all components will be routinely inspected for leaks. As mentioned previously, no fill, shoreline stabilization, floats, or dredging is required for this project. As part of the project, the applicant is also proposing to replace an existing tide gate structure on the western side of the project beneath the ramp to the Marriott brick courtyard. This portion of the project is simply replacement of the existing gate and requires no impact to jurisdiction.

The proposed structures will hold the alignment of the existing riverwalk and will extend no further into the waterway than does the existing riverwalk upstream of the project site. The proposed structures will extend approximately 66 feet into the waterway where the Savannah River is approximately 825' wide (MLW to MLW). The structures will extend approximately 17 feet from the channelward face of the Marriott's brick plaza. The proposed structures will be positioned approximately 185 feet from the federally maintained navigational channel line. All work will be conducted by waterborne crane and barge or from the existing brick plaza or upland.

#### **2.0 Upland Component:**

It is the applicant's opinion that the project does not contain an upland component. The riverwalk connector will be an extension of the existing riverwalk which extends along the entire length of River Street and is pile-supported over the river. The new riverwalk will match the existing development pattern of the existing riverwalk platform. All proposed structures for which the permit is sought could exist without any upland development. The riverwalk will accommodate public walking and access. The proposed structures will be for public use and enjoyment with minimal encroachment on the environment and will be in the public's best interest.

#### **4.0 Alternatives Analysis**

##### **4.1 Alternative Sites**

The purpose of the project is to connect two sections of Savannah Riverwalk to improve functionality and pedestrian access. Alternative sites are therefore not feasible.

##### No Build Alternative:

The only way to completely avoid all impacts would be to not proceed with the proposed project, but that will not satisfy the project purpose. Therefore, the "no build" alternative is not practicable.

##### Alternative Design 1:

The applicant evaluated locating the riverwalk over upland area, but this is not feasible due to the location of the existing Marriott Hotel and other infrastructure in the area. To connect the two sections of riverwalk via upland, the applicant would have to route the walkway around the inland side of the Marriott, along General McIntosh Boulevard, and then back on the eastern side of the hotel. This alternative would essentially abandon the riverwalk concept in place of a sidewalk connecting the two sections. This sidewalk connector would not provide public use and enjoyment of the waterway and would triple the length of walkway required to connect the two sections. It would also put pedestrian users in close proximity to General McIntosh Boulevard which is a busy and dangerous roadway. For these reasons, Alternative Design 1 was considered not feasible.

##### Alternative Design 2:

Alternative Design 2 consisted of constructing a much wider riverwalk platform with a similar alignment as the preferred alternative. This alternative design connected the landward face of the new platform with the

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channelward face of the Marriott's brick plaza for the entire length resulting in one large contiguous pile supported platform. The walkway averaged 20 feet wide and extended to 28 feet in places. This design resulted in 13,526 square feet of pile supported platform within the waterway. Although this design provided more platform space, it resulted in additional impacts and was re-designed to minimize impacts.

Preferred Alternative:

The preferred alternative minimizes impacts to the greatest extent practicable and still satisfies the project purpose. It includes a narrow 12' wide pile supported platform which is actually narrower than the existing riverwalk. The preferred alternative removed the additional area of platform landward of the riverwalk and will leave it as open water instead. The preferred alternative will connect two sections of Savannah's iconic riverwalk, providing continuity and improved access along the eastern end of the Riverfront Plaza. The project will only require 0.165 acre of elevated platform over jurisdictional area. No floats, dredging, filling, or shoreline stabilization impacts are proposed.

**4.3 Avoidance and Minimization:**

In order to minimize the effects of the proposed project, all development activities will be performed using best management practices to further avoid and minimize impacts to upstream and downstream waters. In order to minimize the effects to protected species and habitats, concrete piles will be used instead of steel piles which have been proven to not physiologically affect protected fish species in the Savannah Harbor. Also, the striped bass spawning season in the spring will be closely monitored, and all waterside construction will cease during this period. It is anticipated that these measures will minimize the effect of the project to not only avoided waters, but also to protected species and habitats.

**5.0 Threatened and Endangered Species**

The project area was assessed for the potential occurrence of threatened and endangered species and habitats suitable to sustain these listed species for Chatham County, Georgia. The habitat found within the project site consists of open water which is known to support sea turtles, the west Indian manatee, the shortnose sturgeon, and Atlantic sturgeon.

**Kemp's Ridley, Leatherback, Loggerhead, and Green Sea Turtles (Federal Status – Threatened and Endangered, State Status – Threatened and Endangered):**

These large marine turtles inhabit the offshore waters of the Atlantic and Caribbean. During nesting periods which fall within the summer months, these species leave the water to nest on sandy beaches and primary dunes of the Atlantic and Caribbean coasts. Turtle nests are not uncommon on the barrier islands of Georgia and have been located in the past. The green sea turtle and loggerhead are listed as threatened on the state and federal level, and the Kemp's Ridley and leatherback are endangered. The proposed project requires construction of a walkway supported by concrete piles. No dredging is proposed for the project. It is not anticipated that any pile driving activities will directly impact protected sea turtle species. Indirect impacts associated with lighting were also evaluated. The project has a very small footprint when considered cumulatively with the surrounding City of Savannah. Lighting will be minimal and would not contribute to sky glow or direct light visible from nesting beaches. Therefore, the proposed project will have **no effect** on the Kemp's Ridley, leatherback, loggerhead, or green sea turtle.

**West Indian Manatee (Federal Status – Endangered, State Status – Endangered):**

The west Indian manatee is a federally and state listed endangered species. The manatee is a large aquatic mammal whose habitat consists of warm coastal and spring fed waters. During winter months these mammals are primarily confined to the coastal waters of the southern half of Florida and the spring fed rivers of Florida and Georgia. During the summer months as the water temperature rises, the manatees range expands to as far north as Virginia and it is during these months that the manatees may occasionally utilize the estuaries of coastal Georgia. Critical habitat for this species has been identified as large portions of coastal Florida including the St.

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Mary's River on the Georgia-Florida border<sup>1</sup>. The Savannah River is known to support the west Indian manatee during the summer months. The proposed waterside activities will be conducted in accordance with the United States Army Corps of Engineers (USACE) Standard Manatee Conditions in order to minimize and avoid impacts to the manatee. Generally, these conditions include:

- All personnel and contractors will be advised that there are civil and criminal penalties for harming, harassing, or killing manatees.
- Any silt barriers will be made of material in which manatees cannot become entangled, are properly secured, and are regularly monitored to avoid manatee entrapment. The barriers will not block manatee entry or exit from essential habitat.
- All vessels will operate at "no wake/idle" speeds while in construction areas. All vessels will follow routes of deep water when possible.
- All personnel are responsible for observing water-related activities for the presence of manatees. All construction activities will cease upon sighting of a manatee within 50 feet of the project area and will not resume until the manatees have left the project area for at least 30 minutes.
- All equipment or materials will be lowered at the lowest possible speed.
- Any collision with a manatee shall be reported immediately to the USACE USFWS, and GADNR. In the event of injury or mortality, all aquatic activity will cease pending Section 7 consultation.
- The contractor shall keep a detailed log of sightings, collisions, or injury to manatees. Upon completion of the project, a report summarizing any incidents or sightings of manatees will be submitted to USFWS.
- All fresh water supplies will be maintained to prevent freshwater leakage.
- The applicant will install and maintain appropriate manatee awareness signage at prominent locations within the construction area prior to construction.
- All temporary construction materials will be removed upon completion of the work, and no trash will be discarded in the water.

Because the applicant will adhere to the standard manatee conditions, the project should have no adverse effect on the west Indian manatee.

**Shortnose Sturgeon (Federal Status – Endangered, State Status – Endangered):**

The shortnose sturgeon is state and federally endangered. This fish grows up to 43 inches in length and is easily recognized by the shovel shaped snout, large fleshy barbels, and ventrally located mouth. This species inhabits the coastal waters of Georgia including river mouths, bays and estuaries, and depending on the water temperature, enters freshwater to spawn during January through May. Acknowledged spawning periods for this area normally occur from February through March. Normal spawning locations are characterized by swift currents over gravel, rubble, or submerged timber/logs. Nursery habitat for this species is normally found downstream of the freshwater/saltwater line and is associated with a sandy bottom.

SECI assessed the project's potential effects associated from underwater noise, but the project only includes installation of approximately 80 (20") concrete piles. Only 4-6 piles will be driven each day for a total estimated pile driving time of 14 – 20 days. To ensure there is no possibility of physiological injury, the contractor will start each pile with a series of low energy taps to ensure no fish are in close proximity to the pile. It was also determined that no effects will result from cumulative sound exposure because this is only applicable where animals are repeatedly exposed to the noise over time such as nursery habitat, resting habitat, or feeding habitat; none of which are

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<sup>1</sup>U.S. Fish and Wildlife Service. 1992. Endangered and Threatened Species of the Southeast United States (The Red Book). Prepared by Ecological Services, Division of Endangered Species, Southeast Region, Government Printing Office, Washington D.C. 1,242 pp. (two volumes)

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present near the project site. The river is also wide enough at the project site (890') for fish to easily avoid the area during pile installation, so the project will not act as a barrier for migrating fish. Lastly, it was determined that the project will not affect the behavior of the fish because sturgeon have very poor hearing sensitivity, they have the ability to easily avoid the area if necessary, the project is extremely small when compared to the size of the Savannah Harbor, pile installation is only expected to last 14 - 20 days, noise will be masked by ambient noise levels in the river such as ship traffic, and piles will only be driven for 12 hours per day thereby providing 12 hours of no pile driving activity. Due to the small number of piles and the measures and information discussed above, it was determined that the project would have no effect on the shortnose sturgeon.

**Atlantic Sturgeon (Federal Status – Endangered, State Status – Endangered):**

The Atlantic sturgeon is a newly listed species. Atlantic sturgeon can grow to approximately 14 feet long and can weigh up to 800 lbs. They are bluish-black or olive brown dorsally (on their back) with paler sides and a white belly. Atlantic sturgeon are similar in appearance to shortnose sturgeon, but can be distinguished by their larger size, smaller mouth, different snout shape, and scutes. Atlantic sturgeon are anadromous; adults spawn in freshwater in the spring and early summer and migrate into estuarine and marine waters where they spend most of their lives. They spawn in moderately flowing water in deep parts of large rivers. Sturgeon eggs are highly adhesive and are deposited on bottom substrate, usually on hard surfaces (e.g., cobble). It is likely that cold, clean water is important for proper larval development.

The applicant understands that the Atlantic sturgeon is present in the Savannah River during certain times of the year. The information discussed above for the shortnose sturgeon also applies to the Atlantic sturgeon, and it was determined the project will have no effect on Atlantic sturgeon. With regards to designated critical habitat for the Atlantic sturgeon, the proposed project will extend the existing Savannah Riverwalk in front of the Marriott Hotel, and the project will conform to upstream and downstream land uses. The only activity proposed is driving piles and installing elevated platform. No dredging, filling, bank armoring, dewatering, alteration of currents or flow, or water quality degradation would occur that could affect the four essential features of the habitat as identified by National Marine Fisheries Service (hard bottom, transitional zones, depth/physical barriers, water quality). It was therefore determined that the proposed project would have no effect on Atlantic sturgeon or critical habitat.

**6.0 Essential Fish Habitat**

The proposed waterside activities are located along the banks of the Savannah River which has been identified as Essential Fish Habitat (EFH). The proposed platform will be elevated over jurisdictional area but will not impact any existing vegetated marsh which is identified as one of the most highly productive habitats for managed species. All activities will be located over open water, and no change of habitat will occur. It was therefore determined that the project would not significantly affect EFH.

**7.0 Impaired Waters**

The project site is located on the Savannah Harbor which is listed on the 303(d) List of impaired waters as not supporting the use of fishing based due to low dissolved oxygen. The project consists of installing a pile supported platform and does not require dredging, filling, or other adverse impacts to the waterway. It is not anticipated the project would affect the dissolved oxygen level in the Savannah Harbor and would not contribute to water quality degradation.

**8.0 Supplemental Information**

This additional information is provided for compliance with Coastal Marshlands Protection Act of 1970 information requirements:

**OCCA 12-5-286. Permits to fill, drain, etc., marshlands.**

*(b) Each application for such permit shall be, properly executed, filed with the department on forms as prescribed by the department, and shall include:*

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(1) ***The name and address of the applicant-***  
City of Savannah  
Attn: Mr. Heath Lloyd  
P.O. Box 1027  
Savannah, Georgia 31402

(2) ***A plan or drawing showing the applicant's proposal and the manner or method by which such proposal shall be accomplished. Such plan shall identify the coastal marshlands affected-***

See attached drawings from Thomas & Hutton.

(3) ***A plat of the area in which the proposed work will take place-***

To the landowners knowledge, there is no plat for the upland property, and no plat is referenced in the deed. However, a legal description is attached to the deed that describes the property boundaries, and it is included with this permit application. The attached permit plans depict the location of the proposed activities.

(4) ***A copy of the deed or other instrument under which the applicant claims title to the property or, if the applicant is not the owner, then a copy of the deed or other instrument under which the owner claims title together with written permission from the owner to carry out the project on his land. In lieu of a deed or other instrument referred to in this paragraph, the committee may accept some other reasonable evidence of ownership of the property in question or other lawful authority to make use of the property; The committee will not adjudicate title disputes concerning the property which is the subject of the application; provided, however, the committee may decline to process an application when submitted documents show conflicting deeds-***

Attached is the deed to the property owned by Columbia Properties Savannah, LLC. Also attached is a letter of permission from Columbia Properties Savannah, LLC to the City of Savannah authorizing the City to apply for the subject permit.

(5) ***A list of all adjoining landowners together with such owners' addresses, provided that if the names or addresses of adjoining landowners cannot be determined, the applicant shall file in lieu thereof a sworn affidavit that a diligent search, including, without limitation, a search of the records of the county tax assessor's office, has been made but that the applicant was not able to ascertain the names or addresses, as the case may be, of adjoining landowners-***

SRL Land Venture, LLC  
3340 Peachtree Road, Suite 1400  
Atlanta, GA 30326

East River Street, LLC  
3405 Piedmont Road NE, Suite 175  
Atlanta, GA 30305

(6) ***A letter from the local governing authority of the political subdivision in which the property is located, stating that the applicant's proposal is not violate of any zoning law;***

Attached is the letter from the City of Savannah Zoning Administrator certifying that the proposed activities are not in violation of the zoning ordinances of the City.

(7) ***A non-refundable application fee to be set by the board in an amount necessary to defray the administrative cost of issuing such permit. Renewal fees shall be equal to application fees, which shall not exceed \$1,000.00 for any one proposal and the fee shall be paid to the department.***

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Enclosed is check in the amount of \$500 for the proposed project.

**(8) A description from the applicant of alternative sites and why they are not feasible and a discussion of why the permit should be granted-**

See above project description

**(9) A statement from the applicant that he has made inquiry to the appropriate authorities that the proposed project is not over a landfill or hazardous waste site and that the site is otherwise suitable for the proposed project-**

A review of the Hazardous Site Index for Chatham County, Georgia indicates that the subject property does not contain hazardous waste sites or landfills.

**(10) A copy of the water quality certification issued by the department if required for the proposed project-**

It is anticipated that the U.S. Army Corps of Engineers will authorize the project as a Letter of Permission, and as such, no 401 Water Quality Certification will be required. In the event that the USACE requires a Section 10 permit, a 401 Certification will be obtained from EPD.

**(11) Certification by the applicant of adherence to soil and erosion control responsibilities if required for the proposed project-**

The project will conform to all required land disturbing and stormwater management permits as required by the City of Savannah and/or Chatham County, Georgia.

**(12) Such additional information as is required by the committee to properly evaluate the application.**

This application has been prepared with consideration for the interests of the general public of the State of Georgia as defined in OCGA 12-5-286(g).

**OCGA 12-5-286. Permits to fill, drain, etc., marshlands.**

**(g) In passing upon the application for permit, the committee shall consider the public interest, which, for purposes of this part, shall be deemed to be the following considerations:**

**(1) Whether or not unreasonably harmful obstruction to or alteration of the natural flow of navigational water within the affected area will arise as a result of the proposal-**

The proposed project will not alter natural flow of navigable waters nor will it obstruct public navigation. The proposed structures will extend no further into the waterway than the channelward face of the existing riverwalk upstream of the project.

**(2) Whether or not unreasonably harmful or increased erosion, shoaling of channels, or stagnant areas of water will be created-**

The project will not increase erosion, shoaling of channels, or create stagnant areas of water.

**(3) Whether or not the granting of a permit and the completion of the applicant's proposal will unreasonably interfere with the conservation of fish, shrimp, oysters, crabs, clams, or other marine life, or wildlife, or other resources, including but not limited to oxygen supply-**

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The proposed project will not interfere with the conservation of fish, shrimp, oysters, crabs, clams, or other marine life, or wildlife, or other resources, nor affect water and oxygen supply.

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**May 19, 2016**

**Brandon W. Wall**

**Project Biologist**

**Sligh Environmental Consultants, Inc.**

**B wall@slighec.com**

**RE: Zoning Certification for the Riverwalk Connector Project SECI # 01-15-053**

**Mr. Wall:**

The purpose of Riverwalk Connector Project is to connect two sections of the Savannah Riverwalk and to expand the Riverwalk in front of the Marriott Hotel Riverfront at 100 General McIntosh Blvd. This area is zoned B-B (Bayfront Business). The proposed activities are allowable under the provisions of the zoning ordinances for the City of Savannah.

Sincerely,

A handwritten signature in black ink that reads "T.W. Petrea". The signature is written in a cursive style.

T.W. Petrea

Principal Zoning Inspector

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