

CESAS Form 19 Support Documentation
Colonial Terminals, Inc.
Georgia Kaolin Terminal Dock Improvements
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

Colonial Land Investment Company (applicant), is proposing to improve the Georgia Kaolin Terminal (GKT) located approximately 2.25 miles upstream of the Talmadge Bridge (US Hwy 17), at the northern terminus of Foundation Drive, on the Savannah River. The site is located entirely within the Lower Savannah River Watershed (HUC 03060109), and the coordinates of the site are 32.1122°N, 81.1262° W.

1.1 Site Conditions

The habitat within the footprint of the proposed waterside activities consists of open water. The upland area of the project consists of the existing dry bulk terminal and its industrial land use. The river bank at this location has been stabilized with heavy rip-rap along the slope. No vegetation is located on the site or within the waterway, and adjacent land uses consist of upstream and downstream industrial facilities with heavy bank armoring.

1.2 Existing Structures in Jurisdiction

The existing dock consists of an approximately 550' x 45' pile supported concrete deck (25,814 sq. ft. total) with two 28' x 100' (2,800 sq. ft.) access bridges on each end (the southern access bridge is outside of jurisdiction). Upstream and downstream of the dock are two mooring dolphins (718 sq. ft. total) connected to the main dock by 6' wide concrete walkways (1,270 sq. ft. total). An existing loader/conveyor system extends from the upland and spans over the dock and is used for loading dry bulk goods. Existing mooring hardware including fenders and bollards are also located on the dock. The dock is supported by 18-inch square concrete pilings. The existing structures extend approximately 65 feet into the waterway from MLW where the waterway is approximately 1,200 feet wide (MLW to MLW). The existing dock structure within jurisdiction totals approximately 30,602 sq. ft.

1.3 Proposed Site Development Plans

The GKT is a dry bulk handling facility in which products are brought in, stored, and redistributed via vessels on the Savannah River. Ships are loaded and unloaded with dry products (primarily cement) by a system of conveyors and loaders which lead to a series of storage silos on-site. The two large ship loaders are mounted on concrete pillars/beams along the river's bank. When a ship is at berth, the loaders swing out over the ship and load the dry bulk cargo. When not in use, the loaders are swung back over the upland and stowed.

The proposed improvements include installing a new rail-mounted cement unloader and improving the existing fendering/mooring system to accommodate larger ships. A 41' x 117' (4,797 sq. ft.) deck extension will be constructed on the downstream side of the dock. The new deck will support new rails to facilitate stowage of the unloader, and the new decking will provide vehicle access and maintenance of the equipment. The deck and rail improvements will displace the existing downstream mooring dolphin walkway resulting in the removal of 535 sq. ft. of structure, so a new 6' x 7' access platform (42 sq. ft.) will be constructed on the inside of the deck extension for access to the existing dolphin. To support the cement unloading operation, a new elevated jetty conveyor will be installed along the landward edge of the dock. This will require the installation of (6) 2' x 9.5' pile supported caps (114 sq. ft. total) that connect to the existing bent caps/landside edge beam. The jetty conveyor will be elevated well above the elevation of the deck and would not result in any shading effect or other impact to Coastal Marshlands. On the downstream side of the northern access trestle, a 1,300 sq. ft. triangular deck extension will be added to support the

conveyor and to provide access/maintenance to the equipment. The existing fender system will also be replaced with new fenders capable of handling larger bulk ships. In all, the new dock structures total 6,253 sq. ft. (0.144 acre). Considering that the project will remove 535 sq. ft. of the existing structure, the project will increase the existing 30,602 sq. ft. dock to 36,320 sq. ft. No dredging, fill, or bank stabilization is required for the project. All work will occur over open water and will be pile supported. All work will be conducted by waterborne crane and barge or from upland.

2.0 Upland Component:

It is the applicant's opinion that the project does not contain an upland component. The project will upgrade the existing dock to improve operations at an existing industrial facility. No upland improvements are necessary to support the waterside facilities. All proposed structures for which the permit is sought are water dependent and are necessary for the loading and unloading of ships.

3.0 Project Justification

The purpose of the proposed project is to improve safety, access, efficiency, and the loading/unloading capability of the existing GKT by installing a new rail-mounted cement unloader and improving the existing dock. The proposed dock modifications are necessary to support, access, and maintain the new equipment and to improve dock accessibility for larger dry bulk ships. The project is required to keep up with the growing demand for the dry bulk products that the terminal processes, stores, and distributes. The proposed structures are water dependent as is the new unloader which must be located immediately adjacent to moored vessels. No bank stabilization, dredging, or fill material is required for the project.

4.0 Alternatives Analysis

4.1 Potential Alternative Designs:

The project is water dependent as it is needed to accommodate loading and unloading ships. As such, there are no alternative sites with less jurisdictional impact that would satisfy the project purpose. The proposed project will improve the safety, efficiency, and loading/unloading capability of the existing terminal. The new deck will support the improved unloading system and will not only allow better access and operator safety, but it will also better facilitate periodic inspection, maintenance, and repair of the proposed structure. All impacts are limited to shading over deep open water and are the minimum to support the proposed unloader system and safe operation of the terminal.

4.2 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.

5.0 Threatened and Endangered Species

SECI completed a threatened and endangered species survey within the project area where plant communities and habitats were observed and noted to determine if they match the habitat types where the listed species have potential to occur. The upland area consists of fully developed and operational industrial facilities which do not support any protected species. The Savannah River is known to support the shortnose sturgeon, Atlantic sturgeon, and west Indian manatee. The applicant will comply with the USACE Savannah District's standard manatee conditions so that the project does not adversely affect the manatee. With respect to sturgeon, the project requires the driving of approximately 102 18" pre-stressed concrete piles. Based on previous research and documentation, the driving of concrete pilings less than 20" in diameter has proven to have a minimal level of noise propagation into the waterway. No steel piles, which could have a higher degree of noise generation during installation, are proposed for this project. To minimize noise levels and potential effects on marine species, a cushion block will be used on top of the pile during installation. Each pile will also be started with a series of "soft taps" to disburse any aquatic species that may be in the vicinity. Also, pile driving will be limited to 12 hours per day, allowing ample time for sturgeon or other species to pass by the project site. Based on an estimated average of 4 – 6 piles installed per day, the total anticipated pile driving period is expected to be between 20 and 30 days. Also, given the minimal nature of the proposed project-related impacts, is not anticipated that any shading impacts would affect these species. Furthermore, no dredging, fill, or excavation is required. That could impact protected species. Due to the minimal nature of the proposed waterside activities, it was concluded that the proposed project should have no adverse effect on any protected species.

6.0 Essential Fish Habitat

The proposed waterside activities are located on the Savannah River which has been identified as Essential Fish Habitat (EFH). The project does not require any fill or dredge activities, and would not result in the shading, filling, or dredging of vegetated marsh or shallow water habitat. The only proposed activities in EFH consist of installing pile-support decking over deep, murky, open water. It was therefore concluded that the project would not adversely 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 due to low dissolved oxygen. The project only consists of installing a minimal pile supported deck and beam structure over the water to support the upgraded unloader equipment which would not affect dissolved oxygen in the waterway. The project would not contribute to water quality degradation in the Savannah Harbor due to the containment measures being employed on the dock.

8.0 Supplemental Information

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

OCGA 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:

(1) The name and address of the applicant-

Colonial Land Investment Company
Attn: Mr. Pratt Summers
P.O. Box 576
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 permit exhibits

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

See attached plat of the property.

(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-

See attached deed for the property

(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-

GKT Properties, Inc
101 N. Lathrop Ave.
Savannah, GA 31415

Epic Midstream, LLC
2200 W. Loop S. Suite 550
Houston, TX 77027

(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 and stamped/signed drawings from the City of Savannah Zoning Administrator certifying that the project does not violate any zoning ordinances.

(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 shall be paid to the department.

The appropriate application fee as determined by CRD will be provided upon request.

(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-

The project will be authorized by a Letter of Permission from the U.S. Army Corps of Engineers and not a formal Section 10/404 permit. Because a Section 404 permit will not be required for the project, a 401 Water Quality Certification will not be required.

(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 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 deck extension will be located downstream of the existing dock and will extend no further into the waterway than the existing structure.

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

The proposed 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 water and oxygen supply-

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.



**CHATHAM COUNTY DEPARTMENT OF BUILDING
SAFETY & REGULATORY SERVICES**

1117 Eisenhower, Savannah, GA 31406
PO Box 8161, Savannah, GA 31412-8161
912-201-4300 – Fax 912-201-4301



Gregori S. Anderson, CBO
Director

Clifford Bascombe, CBO, CFM
Assistant Director

January 28, 2020

Mr. Brandon W. Wall
Project Biologist
Sligh Environmental Consultants, Inc.
31 Park of Commerce Way
Suite 200B
Savannah, GA 31405

RE: 509 Foundation Drive
Georgia Kaolin Terminal Dock

Dear Mr. Wall;

The referenced property is located within the I-H, High Industrial zoning district. The existing dock is a use that is allowed under the Chatham County Zoning ordinance; see the attached plans.

If there are any questions, contact this office at (912) 201-4320.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregori S. Anderson".

Gregori S. Anderson, CBO
Interim Zoning Administrator

GSA/ja

Attachment

Coastal Marina, Community or Commercial Dock Checklist

(fill in the blanks as indicated or answer yes or no)

LOCATION:

County Chatham Landmarks Foundation Drive
Municipality near Savannah Waterway Savannah River

FACILITY:

Facility Type Private Public Commercial Industrial
Dock Space Leased Sold Rented Other
Size of Upland Area (sq. ft.) 59.185 acres Size of Submerged Area (sq. ft.) 3.4 acres

WATERWAY INFORMATION:

open water river creek basin
Tidal Range (ft MLW) +/- 7.5 feet Water Depth (ft. MLW) +/-30 feet
Channel Width (ft. MLW) +/- 1200 feet Depth of Dredging (ft. MLW) N/A

Distance facility will extend into the waterway beyond MLW the proposed structure will extend no further than the existing dock facility which extends approximately 65 feet into the waterway

EXISTING OR PLANNED SERVICES IN JURISDICTION:

<input type="checkbox"/> boat ramp	<input type="checkbox"/> hoist	<input type="checkbox"/> mobile lift	<input type="checkbox"/> vessel TV hookup
<input type="checkbox"/> railway	<input type="checkbox"/> fuel	<input type="checkbox"/> propeller repair	<input type="checkbox"/> electrical repair
<input type="checkbox"/> pump-out vessels	<input type="checkbox"/> hull repair	<input type="checkbox"/> engine repair	<input type="checkbox"/> vessel electric hookup
<input type="checkbox"/> boat building	<input type="checkbox"/> ship's store	<input type="checkbox"/> dockmaster's office	<input type="checkbox"/> fire protection
<input type="checkbox"/> restrooms	<input type="checkbox"/> showers	<input type="checkbox"/> restaurant	<input type="checkbox"/> laundromat
<input type="checkbox"/> hotel	<input type="checkbox"/> # of vehicle parking spaces	<input type="checkbox"/>	<input type="checkbox"/> # of trailer parking spaces

DREDGING/FILLING/ShORELINE STABILIZATION:

NO Will dredging be required for the access channel?
 NO Will dredging be required for boat basin?
 NO Is filling proposed in tidal wetlands?
 NO Is filling proposed in open water?
 NO Will dredge disposal sites be required?
 N/A Have future dredge disposal sites been identified?
 N/A Have future dredge spoil sites been set aside with deeds or easements?
 NO Is shoreline stabilization proposed? If so, what type?
 YES Is the project in or near a US Army Corps of Engineers maintained channel or basin with an authorization depth of 12 feet or greater? (if so, contact the Corps of Engineers)

HABITAT/WILDLIFE/CULTURAL RESOURCES: (contact GADNR Wildlife Resources Division, US Fish & Wildlife Service, National Marine Fisheries Service, GADNR Coastal Resources Division Marine Fisheries, OR GADNR Historic Resources Division)

- No Is this site located near a wildlife refuge, wilderness area, special management area, or other area specifically located for the protection of fish and wildlife?
If yes, what is the distance? _____
- YES Is this project in an area identified as “**essential fish habitat**”? (contact GADNR CRD Marine Fisheries). The project is located within tidal waters which have been identified as essential fish habitat. The project will not impact vegetated marsh or shallow intertidal areas. All structures will be over open water and should not adversely affect EFH
- YES Are rare, threatened, endangered or otherwise designated unique or outstanding aquatic or terrestrial species or their habitats known to be present at or near the project site? The project is located within Section 10 tidal waters which may support the West Indian manatee, Atlantic sturgeon, and shortnose sturgeon. A construction methodology will be implemented to minimize noise levels during pile driving. No other activities such as filling or dredging are proposed which could harm protected species. All construction activities will be conducted in accordance with Standard Manatee Conditions provided by the Corps of Engineers, and the minimal activities will not affect sturgeon species. It is unlikely that the project will have an adverse effect on any protected species.
- NO Do oyster or clam beds occur in or near the project site or access channels?
If yes, what is the distance? _____ If yes, what is the acreage? _____
- NO Is the project site near active crabbing areas? (contact GADNR CRD Marine Fisheries) .
- NO Is the project site in designated bait zones? (contact GADNR CRD Marine Fisheries)
- NO Is the project site in or near an area of historic, archeological, or scenic value?
If yes, explain _____
-