CESAS Form 19 Support Documentation
GKT Properties, 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

GKT Properties, Inc ("Applicant") is proposing to expand the existing industrial operation at the Georgia Kaolin Terminal (GKT) to accommodate breakbulk cargo. The project site is located on the Savannah River at 509 Foundation Drive approximately 1.2 mile east of GA Highway 25, approximately 2.4 miles upstream of U.S. Highway 17 (Talmadge Bridge) in Chatham County, Georgia. The project will add a new breakbulk berth at GKT by extending the existing wharf and dredging in front of it. The project will satisfy a growing need for breakbulk cargo in the Savannah Harbor.

Figure 1: Project Location

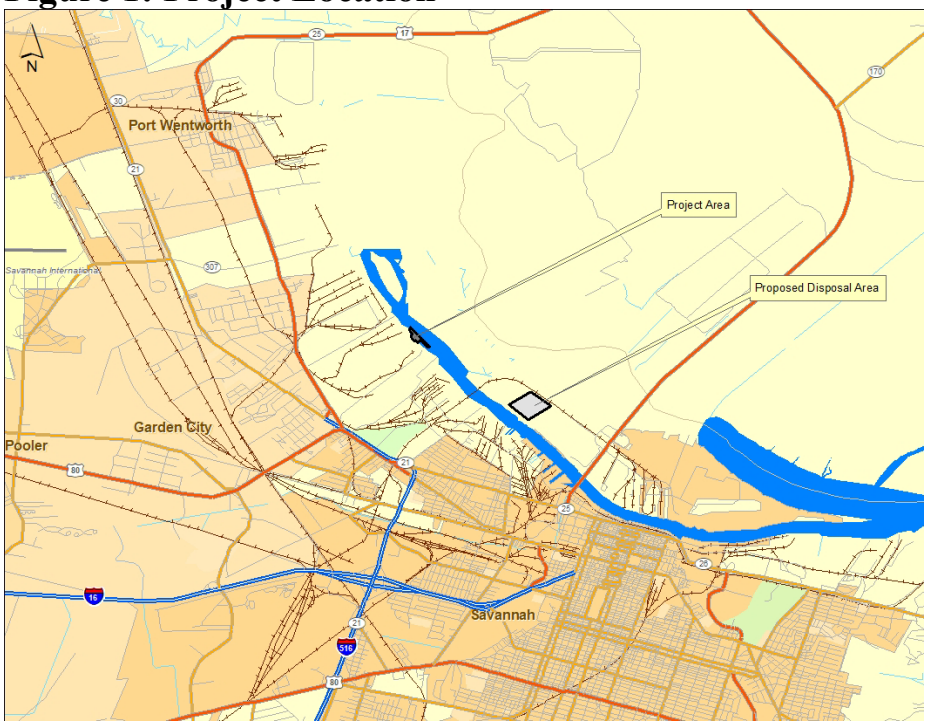
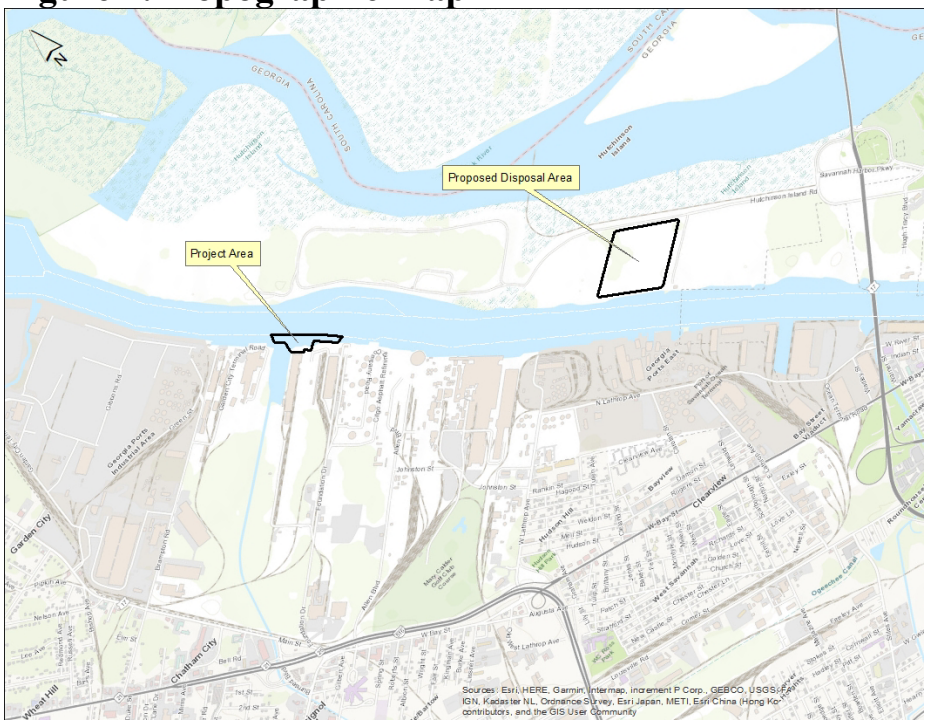


Figure 2: Topographic Map



2.0 Existing Site Conditions

The existing 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.

The terminal is located within a heavily developed and industrialized area of Savannah. Upstream of GKT are multiple marine terminals including Gold Bond Products, Vopak, and Georgia Ports Authority's (GPA) Garden City Terminal (GCT). Downstream of the site are other heavy industrial properties including International Matex Tank Terminals and International Paper. Each property has its own dock facilities, maintained berths, and stabilized shorelines. The industrial land use of GKT and the

surrounding industrial properties contributes to the existing environmental condition of the property and the disturbed nature of the habitats on-site.

2.1 Existing Habitats

The habitat within the footprint of the proposed waterside activities consists of open water and intertidal shoreline. The upland area is fully developed with industrial facilities. The river bank at this location has been stabilized with heavy rip-rap along the slope, and very little marsh vegetation is present.

The Savannah River at the project site is approximately 1,200 feet wide at mean low water (MLW). The river is heavily utilized daily for the transport of goods by water borne vessels. Large container ships, bulk ships, barges, dredges, pilot boats, pleasure yachts, and personal/recreational watercraft use the river each day. To maintain international commerce, the 500-foot wide channel is continuously dredged by the U.S. Army Corps of Engineers (USACE) to maintain its permitted depth of -47 feet MLLW (plus 2' allowable overdredge and 2' of advanced maintenance). Additionally, numerous berths and ship access channels along the shipping channel are routinely dredged to maintain adequate water depths which vary depending on the specific use. Approximately seven million cubic yards of sediments are removed each year from the Federal navigation project alone. All of these land uses and ongoing activities in the harbor along with natural wind, currents, tides, and storms contribute to the ambient water quality and habitat conditions in the river.

2.2 Existing Structures

The project site consists of two parcels; one owned by the applicant (GKT Properties, Inc), and the other owned by Colonial Land Investment Company (CLIC). Both are subsidiaries of Colonial Group, Inc. The upstream parcel owned by the applicant, contains an inland boat basin with a commercial dock. Based on aerial photography estimates, the dock consists of a 355' x 45' (15,975 sq. ft.) main wharf with two (2) 37' x 50' (3,700 sq. ft.) access bridges. On the upstream end of

the main wharf is a 4’ x 90’ (360 sq. ft.) catwalk connecting to a 12’ x 12’ (144 sq. ft.) mooring dolphin. Southwest of the main dock is another 70’ x 32’ (2,240 sq. ft.) wharf with a 4’ x 300’ (1,200 sq. ft.) pier extending downstream. Additional bulk loading equipment is located on the wharfs. It is estimated that this total structure is approximately 23,619 square feet. It should be noted that commercial operations at this wharf have been abandoned, and no modifications are proposed to this dock structure. All above estimates are based on aerial photography estimates. There is currently a maintenance dredging permit for this inland berth (SAS-2001-12750) which authorizes the annual removal of 54,000 cubic yards of material to a depth of -36 MLW.

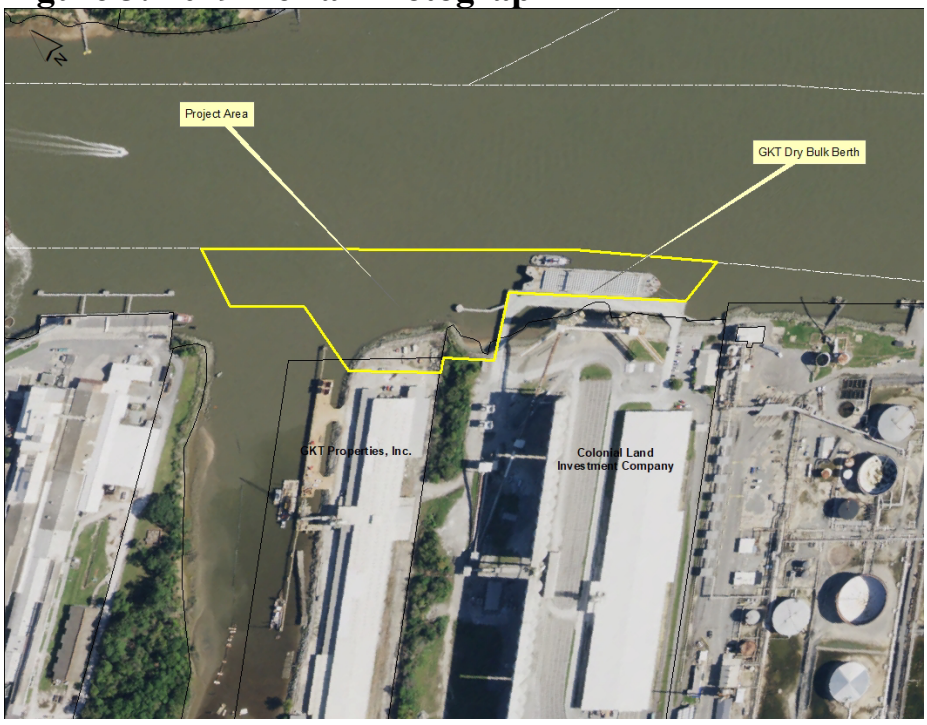
The existing dock on Savannah River on the downstream parcel owned by CLIC is used daily for dry bulk cargo. This dock is proposed for extension as part of the project. It consists of an approximately 550' x 45' pile supported concrete deck (25,814 sq. ft. total) with two 28' x 100' (2,800 sq. ft.) access 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 5.5' wide concrete walkways (1,270 sq. ft. total). An existing loader/conveyor system extends from the upland and spans over the dock.

The entire shoreline of both parcels is stabilized with heavy rip-rap totaling approximately 2,260’ x 25’ (56,500 sq. ft.).

In 2020, CMPA Permit #773 and Department of the Army Permit SAS-2005-00435 was issued for installation of a new rail-mounted cement unloader on the CLIC dock. A 41' x 117' (4,797 sq. ft.) deck extension was installed on the downstream side, and a catwalk was removed resulting in the removal of 535 sq. ft. of structure. A triangular-shaped access platform totaling 380 sq. ft. was added on the inside of the deck extension. To support the new cement unloader an elevated jetty conveyor was installed along the landward

edge of the dock supported by six (6) 3' x 10' pile supported caps (180 sq. ft. total) and (2) 3' x 11' (66 sq. ft. total) pile supported caps. On the downstream side of the northern access trestle, a 1,700 sq. ft. triangular deck extension was added to support the conveyor and to provide access/maintenance to the equipment. The construction authorized under CMPA Permit #773 and SAS-2005-00435 has been completed, and the existing dock structure totals 37,193 sq. ft. The existing dock extends approximately 65 feet into the waterway from MLW where the waterway is approximately 1,060 feet wide (MLW to MLW). Maintenance dredging to a depth of -42' MLW (100,000 cubic yards annually) is authorized at the dry bulk dock under SAS-2001-12670.

Figure 3: 2019 Aerial Photograph



3.0 Proposed Site Development Plans

The proposed project will add a new breakbulk berth at the facility to diversify the marine operation of the terminal and meet an increased need to accommodate breakbulk cargo in the Savannah Harbor. First, an existing 17' x 24' octagonal mooring dolphin (365 sq. ft. total) and 5.5' x 130' (715 sq. ft.) catwalk on the northwest end of the existing GKT dry bulk dock will be removed from jurisdiction to make way for the new dock structure. The new dock will consist of an 810' x 70' main wharf structure (57,510 sq. ft.), to accommodate the stevedoring of break bulk vessels. The apron of the dock will extend to the upland to further facilitate the handling and staging of breakbulk cargos and to ensure safe and efficient operation of the facility (57,490 sq. ft.). On the upstream side of the dock will be a new mooring dolphin (700 sq. ft.) connected to the dock with a 60' x 5.5' (330 sq. ft.) catwalk. A total of 15 new cone fenders will be mounted to the face of the dock. Each fender will measure approximately 9.5' x 5' (713 sq. ft. total). The fender line of the new dock will break slightly to the west from the alignment of the existing dry bulk dock face in order to line up with the neighboring upstream dock and to not interfere with the Federal Navigation Channel. As part of the project, the applicant is also proposing to modify the existing dry bulk transfer tower on the existing dock and add a new conveyor from the dock to the upland for the transfer of dry bulk goods. No impacts are associated with the tower modification as all work is on top of the existing dock. The new 12' x 100' (1,200 sq. ft.) conveyor will completely span the waterway from the dock back to the upland. The proposed structures will be no closer to the Federal Channel than the existing dock structure. The total area of proposed pile supported structure is 117,943 sq. ft. (2.71 acres).

To accommodate modern breakbulk cargo vessels, the proposed project will require dredging to a depth of -45' MLLW (with a 2' overdredge allowance) between the dock face and the Federal Channel over a 2.78 acre area. As shown on the permit exhibits, all dredging will be in deep open water with existing depths averaging approximately 36 - 38 feet. During this effort, the existing GKT dry bulk berth is proposed to be deepened within its permitted dredging extents (2.56 acres) from the currently authorized

-42’ MLW to -45 MLLW (with a 2’ overdredge allowance). A 3’ deep x 8’ wide trough will also be dredged at the fender line. Initial material for both berths will be removed by hydraulic dredging or clamshell methods. Estimated dredging volumes to a depth of -45 MLLW (plus 2’ overdredge) for both berths are only 70,800 cubic yards. The dredge spoils will be deposited into the GPA’s Hutchinson Island Tract B Confined Disposal Facility (CDF). A Letter of Intent signed by GPA is attached authorizing the proposed use of the facility.

The GKT’s current maintenance dredging permit (SAS-2001-12670) authorizes the annual removal of 100,000 cubic yards per year from the existing berth. Based on maintenance volumes over the last several years, it is expected that the 100,000 cubic yard allowance will cover both berths. Although there is an existing maintenance dredging permit, that permit will have to be modified in the future to reflect the new dredging extents and depths. To ensure there is no lapse or gap in permit approvals that would hinder the ability to maintain the berths, the applicant proposes as part of this project annual maintenance dredging of 100,000 cubic yards over both berths to an allowable depth of -45’ MLLW (plus 2’ overdrege). Maintenance dredging will be conducted in accordance with all of the terms and conditions of the existing maintenance permit. If desired by the Corps upon permit approval, the applicant will modify SAS-2001-12670 accordingly to cover the annual maintenance component of the facility into the future. Once the proposed project is constructed, the existing maintenance dredging permit for the inland boat basin on the upstream side of the project (SAS-2001-12750) will no longer be needed and will be relinquished, allowing the inland slip to return to a more natural state.

No wetland or marsh fill or additional bank stabilization is required for the project. All work will occur over or within open water or rock revetment/stabilized shoreline and will be pile supported. All work will be conducted by waterborne crane and barge, from upland, or from the existing wharf.

4.0 Upland Component:

The upland component of the proposed wharf consists of the paved dock approach (e.g. the portion of paved wharf over the upland). The majority of the upland component is fully developed and utilized for industrial purposes. A portion of the upland component between the GKT parcel and the CLIC parcel consists of undeveloped area adjacent to a tidal ditch which outfalls into the Savannah River. The approach slab will be constructed so that no impacts occur to the tidal ditch. Construction activities within the upland component include site grading and construction of the wharf approach slab. A stevedore's office building will also be constructed for the safety, well-being, and supervision of the stevedore's working on-site. The development activities within the upland component are not expected to have an adverse effect on the marshlands component. The approach slab will slope towards the upland and will be properly graded so that stormwater received on the approach slab will drain away from the Savannah River and the tidal ditch. Depending on final design, stormwater received on the upland component may be treated through a variety of measures include bioswales, retention ponds, infiltration trenches, etc. The design will ensure that there are no point source discharges of stormwater from the upland component directly into the marshlands component. During construction, proper BMP's such as silt fencing, grassed slopes, etc. will be utilized to prevent erosion and sedimentation. As acknowledged by EPD, the proposed construction activities within the upland component of the project will not require a state waters buffer variance.

5.0 Project Need and Purpose

The proposed project is needed to accommodate a growing need for breakbulk processing areas in the Savannah Harbor. Historic growth in containerized cargo over the past decade in Savannah has required terminals to shift focus to keep up with this higher demand. As additional facilities are developed, and existing facilities are modified to accommodate container throughput growth, effects to breakbulk cargo facilities are possible. Based on the current trends, without a new facility to handle Savannah's breakbulk cargo, business could be lost in this area as cargo

owners search for other ports of call to accommodate their needs. The proposed project will keep this vital business in Savannah by building a new breakbulk berth capable of handling the vessels that currently call on Savannah.

Therefore, the applicant's stated purpose for this project is to **construct a breakbulk berth at the GKT to accommodate the growing need for breakbulk cargo in Savannah.** According to the Section 404(b)(1) Guidelines of the Clean Water Act, the U.S Army Corps of Engineers must also define the basic and overall purpose of the project, taking into consideration the applicant's purpose statement. The basic purpose must be known to determine if a project is water dependent. Therefore, the basic purpose for the proposed project is to provide a breakbulk berth which is a water dependent activity. The overall project purpose is used to evaluate practicable alternatives under the Section 404(b)(1) Guidelines. It is proposed that the overall project purpose is to provide a breakbulk berth to accommodate breakbulk cargo in Savannah.

6.0 Alternatives Analysis

The proposed project is not only the expansion of an existing facility, but it is also water dependent as it is needed to accommodate the import and export of breakbulk cargo on waterborne vessels. As such, there are no alternative sites with less jurisdictional impact that would satisfy the project purpose. The proposed project requires construction of a pile-supported wharf and dredging within existing open water habitat. No fill or other adverse modification to the waterway or special aquatic sites are necessary that warrant a review of alternative sites.

6.1 Alternative 1: No Action Alternative:

The project is needed to accommodate a rising need for breakbulk facilities on the Savannah Harbor due to shifting cargo demands, primarily at the Port of Savannah. Should containerized cargo continue its projected growth (as expected) and facilities are modified to keep up with demand, impacts would be felt to the breakbulk operations in Savannah. Without a dedicated breakbulk berth to call on, cargo owners could seek alternative ports of call in other states. The

proposed project will ensure the breakbulk business stays in Savannah, benefiting the local economy and the public.

6.2 Alternative 2: Alternative Alignments:

The applicant evaluated an alternative alignment that put the new wharf directly in line with the existing GKT dry bulk dock. This alternative provides additional flexibility in vessel management and allows larger vessels to use the facility through a longer contiguous (straight) berth line. However, due to the orientation of the Federal Navigation Channel at this location, this alternative alignment would result in ships overhanging into the Federal Channel when at berth, especially on the upstream end of the dock. This alternative would allow two larger vessels to simultaneously dock and required the same impacts as the preferred alternative, but the impacts to navigation and the potential safety concerns caused the applicant to reject this alternative.

6.3 Alternative 3: Applicant's Preferred Alternative:

The preferred alternative will extend the existing GKT dock to add a new berth for breakbulk cargo. The fender line of the new dock will break slightly to the west from the alignment of the existing GKT dock in order to avoid interference with the Federal Navigation Channel. The preferred alignment also lines up with the neighboring industrial dock (Gold Bond Products) upstream of the site so it will not affect their access or navigation. The proposed extension will be no closer to the Federal Channel than the existing GKT dry bulk dock.

First, an existing mooring dolphin and catwalk on the upstream end of the existing GKT dry bulk dock will be removed from jurisdiction to make way for the new wharf. The new dock will consist of a main wharf structure with a pile-supported continuous apron extending onto the shoreline for the handling and staging of breakbulk cargos and to ensure safe and efficient operations. On the upstream side of the dock will be a new mooring dolphin connected to the dock with a short catwalk. Appropriate mooring and berthing

hardware will be installed on the dock.

The proposed project will require dredging to maintain a depth of -45' MLLW (plus 2' allowable overdredge) between the dock face and the Federal Channel. During this effort, the existing GKT berth will also be deepened within its permitted dredging extents from the currently authorized -42' MLW to -45 MLLW (plus 2' overdredge). Initial material will be removed by hydraulic dredging or clamshell methods. Due to the existing depths within the permit area, estimated dredging volumes to a depth of -45 MLLW (plus 2' overdredge) for both berths are only 70,800 cubic yards over a 5.34 acre dredge area. The dredge spoils will be deposited into the GPA's Hutchinson Island Tract B CDF. Future maintenance dredging will be conducted in accordance with the terms and conditions of the applicant's existing maintenance dredging permit and will not exceed the current allowance of 100,000 cubic yards.

7.0 Avoidance and Minimization of Impacts

Section 404(b)(1) mandates that once aquatic impacts on the proposed project site have been avoided to the maximum extent practicable, measures should be taken to minimize the effects of the remaining unavoidable impact. The applicant will implement a variety of construction methodologies and techniques to avoid and minimize impacts to not only jurisdictional waters, but also to protected species and navigation:

- To avoid impacts to the Federal Navigation Channel, the applicant will orient the new dock parallel with the south edge of the channel so that moored vessels do not interfere with Federal navigation and that passing vessels do not impact vessels being worked at the dock.
- The new dock will extend in front of the Dundee Canal (e.g. inland boat slip on the upstream parcel); however, the applicant ensured that the structures left adequate room for navigation into the inlet. As mentioned, the inlet will no longer be used for industrial purposes, so the only use would be by small

recreational vessels or small work skiffs. Although it is highly unlikely that access into the inlet would be frequently needed, the preferred alternative will leave an approximately 75' wide access area between the proposed mooring dolphin and the western (upstream) shoreline. Based on existing soundings, depths in this location average -4' to -6' MLLW. This should allow for more than ample navigation past the project site and into the inlet at all tides.

- All structures will be pile-supported. No Coastal Marshlands/Section 10/404 area fill is required.
- To minimize the effects of any upland activities on the adjacent waterway, appropriate best management practices will be employed
- All work will be conducted by waterborne crane and barge, from upland, or from the existing wharf.

8.0 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 during construction. The dock will utilize the existing fender system at the adjacent dry bulk dock. It is estimated that no more than fifteen cone fenders will be mounted on the face of the dock spaced out every +/- 60 feet. Each fender consists of a 9.5' wide steel frontal panel mounted on a cone which is affixed to a concrete mount on the face of the dock. The fenders will have to extend below the waterline for several reasons. First, the top elevation of the wharf is set to match the existing dry bulk dock to form one continuous dock surface. With the top elevation established, the steel fontal panels must contain enough surface area to ensure berthing pressures do not buckle a ship's hull. The fender panel

cannot extend above the top of the concrete deck as it becomes an interference for mooring lines and other operational components. If the fender panel is limited to above MHHW and the top of wharf deck, then the panel would have to be 20 feet long which would prevent the rubber fender element from functioning properly. Additionally, the fenders need to accommodate lower-freeboard vessels such as barges on occasion. As such, the fender panel must extend to a sufficient depth to ensure that the vessel does not become lodged under the fender, especially at low tide. The steel frontal panel will project approximately 5 feet from the face of the wharf and will maintain a minimum of 3 feet of standoff when compressed. It was therefore determined that the proposed project **may affect but is not likely to adversely affect** the west Indian manatee.

With respect to sturgeon, the project requires the driving of approximately 800 18" pre-stressed concrete piles, installation of an elevated deck structure over the water, and dredging to maintain adequate depths. 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 – 8 piles installed per day, the total anticipated pile driving period is expected to be between 100 and 200 days. It is highly unlikely that any noise, entrainment, or water quality impacts would result from the minimal amount of dredging given the constant dredging that occurs in the Savannah Harbor daily. It is also not anticipated that construction or existence of an additional pile supported wharf on the Savannah Harbor will adversely affect sturgeon habitat given the highly industrialized nature of the river and the southern shoreline.

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.

9.0 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 activities that would result in the loss of aquatic area. The majority of deck structure will be located over deep open water. Only a minor amount will be over intertidal shoreline – the majority of which is stabilized with rip-rap. Only a small amount of intertidal mudflat and marsh patchwork channelward of the revetment will be shaded. Impacts to EFH from dredging would be temporary and minor. Higher TSS levels encountered during dredging would be expected to settle out of the water column quickly. The minor change in depth will not affect habitat types, and the benthic community would be expected to recolonize the area quickly. It is unlikely that this minor amount of shading and dredging would adversely affect EFH or degrade the existing habitat quality or value in the Savannah Harbor.

10.0 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 consists of installing a pile supported deck structure over the water to support breakbulk operations. Dredging will be minimal requiring only 70,800 cubic yards of material removal over 5.34 acres of existing deep open water. The proposed change in depths is minimal and insignificant as existing depths average from 42 – 44 feet in the existing berth and 34 – 38 feet in the proposed berth. No significant deepening, shoreline modifications, or changes to the channel characteristics which could change flow patterns will occur. It is therefore not expected that the minor, temporary, and localized dredging associated with the project would permanently affect salinity or dissolved oxygen in the Savannah Harbor.

11.0 Cultural Resources

All proposed activities are within open water either adjacent to the Federal Channel or within the existing maintained GKT berth. Work consists of minor dredging in deep open water and construction of a pile-supported wharf and dock apron. Based on the nature and location of the proposed activities along with the fact that the project site is entirely developed led to the conclusion that the project would have no potential to cause effects to any sites eligible for listing in the National Register of Historic Places.

12.0 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-

GKT Properties, Inc.
Attn: Mr. Christian Demere
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 plats of the two parcels.

(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; however, the committee may decline to process an application when submitted documents show conflicting deeds-

See attached deeds for the GKT Properties, Inc and the CLIC parcels – both are subsidiaries of Colonial Group, Inc. Since CLIC is not the applicant, a Letter of Permission from them is attached. The dock will extend upstream of the GKT parcel across property owned by Norfolk Southern. Attached is a Letter of Permission for Norfolk Southern giving permission for the applicant to permit and build the dock. SECI did a title search at the Chatham County Courthouse, and the only recorded documents are two Affidavits of Facts Affecting Title. They are also attached to this permit application.

(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-

Southern Region Industrial Realty International Maytex Tank Terminals
650 Peachtree Street NW 400 Poydras Street, Suite 3000
Atlanta, GA 30308 New Orleans, LA 70130

(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 Chatham County 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.

Attached is an application fee in the amount of $500.

(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 Individual Permit from the U.S. Army Corps of Engineers and will

require a 401 Certification.

(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. As mentioned, the dock will extend no closer to the Federal Channel than the existing face of the GKT dry bulk wharf. Also, the applicant will leave an approximately 75' wide area for vessels to pass around the upstream mooring dolphin to access the open water behind the berth (e.g. the Dundee Canal inlet). Water depths at low tide are more than adequate to allow access by recreational vessels at all tides.

(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. As mentioned, the applicant will extinguish the existing maintenance dredging permit for the inland berth on the upstream parcel and will allow this area to revert to more natural conditions.

(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.