

**CESAS Form 19 Support Documentation
GAF Testing Platforms
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

Building Materials Manufacturing Corporation (applicant) is proposing to replace and expand its water quality monitoring platforms at their facility located on the Savannah River. The project site is located at 1 Brampton Road at latitude 32.11670 longitude -81.13097.

The project site is an industrial manufacturing facility that makes building materials. A liquid bulk berth including a maintained slip, dock, and infrastructure owned and operated jointly by Georgia Ports Authority (GPA) and Vopak is located in front of the site. Improvements to the GPA/Vopak berth were permitted under SAS-2001-12360, and a Revocable License/Letter of Authorization was issued by Georgia DNR. The GAF facility does not require marine access to serve the facility and does not bring in ships to the site. The site is protected by a steel sheetpile bulkhead. There are four existing, permitted stormwater discharges which protrude from the bulkhead. As part of the applicant's NPDES permit, there are three water quality testing platforms located above three of the discharge pipes. The platforms are attached to the bulkhead and cantilevered over the waterway. The dimensions are 4' x 5' (20 sf), 4' x 5' (20 sf), and 4' x 8.5' (34 sf). The proposed project will replace each of the three existing steel platforms with platforms of the same dimensions and install a new 4' x 5' (20 sf) platform over the last discharge pipe located on the downstream end of the site. Each platform will have handrails and a small davit crane to assist in access to the outfalls and monitoring activities. No structures are proposed within the waterway, and the new platform will be cantilevered from the existing bulkhead/upland. The structures will extend 5 feet into the waterway where the waterway is 890 feet wide.

2.0 Upland Component:

The upland site is approximately 16.3 acres and is fully paved/developed with a factory, parking, warehouses, and office buildings. It is the applicant's opinion that the project does not contain an upland component. The project consists of installation of a new water quality monitoring platform associated with the applicant's existing NPDES permit. No upland improvements are proposed.

3.0 Project Justification

The purpose of the proposed project is to provide access over the existing outfalls to monitor water quality from the existing, permitted industrial discharge system. The platforms will accommodate that purpose.

4.0 Alternatives Analysis

There are no alternatives with less jurisdictional impact that would satisfy the project purpose. The proposed project will not impact any tidal water as all structures are cantilevered over deep open water.

5.0 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.

6.0 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 USFWS Information for Planning and Consultation (IPaC) lists the following species for the project site: Northern long eared bat, tricolored bat, west Indian manatee, eastern black rail, wood stork, eastern indigo snake, monarch butterfly, and pondberry. Additionally, the

NOAA Section 7 mapper lists loggerhead sea turtle, Kemp's Ridley sea turtle, green sea turtle, Atlantic sturgeon, and shortnose sturgeon at the project site. The project is also located in Designated Critical Habitat (DCH) for Atlantic sturgeon.

The upland area on-site consists of fully developed industrial facilities which do not support any protected species. The Savannah River may support sturgeon, sea turtles, west Indian manatee, and wood storks. No intertidal area is located on site which could provide foraging habitat for wood stork, and no nesting or resting areas are located on-site. Therefore, construction of the new platform and replacement of the existing platforms will have no effect on wood stork. The applicant will comply with the USACE Savannah District's standard manatee conditions during construction so that the project does not adversely affect the manatee. No pile driving or dredging is required, so the project would have no effect on sturgeon or sea turtle species, and the project would have no effect on DCH for Atlantic sturgeon because none of the physical and biological features (PBF's) would be affected. Attached is the IPaC list for the site.

7.0 Essential Fish Habitat

The proposed waterside activities are located over 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 an elevated 20 square-foot structure over open water. It was therefore concluded that the project would not adversely affect EFH.

8.0 Impaired Waters

The only proposed activities over tidal waters consist of installing a small elevated monitoring platform. No fill, dredging, or other waterway disturbance is necessary. The existing industrial discharge system is permitted under NPDES, and the monitoring platforms allow the applicant to monitor water quality in accordance with the permit. It was therefore concluded that the project would not adversely affect water quality.

9.0 Supplemental Information

This additional information is provided for compliance with the 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-

Building Materials Manufacturing Corporation
Attn: Christina Gatlin
1 Brampton Road
Savannah, GA 31408

(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.

(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

(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-

Gold Bond Building Products, LLC
2001 Rexford Road
Charlotte, NC 28211

Georgia Ports Authority
P.O. Box 2406
Savannah, GA 31402

(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;

See attached

(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 Army Corps of Engineers, and no 401 Certification will 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 structures will extend no further than the existing testing platforms extending from the bulkhead. All structures are located landward of (behind) the existing dock on-site.

(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. No modifications are proposed to the waterway. All structures will be cantilevered over the waterway from the existing upland.

(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.