

CESAS Form 19 Support Documentation
Colonial Terminals, Inc.
Dock 2 Fender 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

Sligh Environmental Consultants, Inc. (SECI), on behalf of Colonial Terminals, Inc. (applicant), requests authorization for improvements to the existing fender and mooring system at Dock 2 of Colonial's Plant 2 facility in Chatham County, Georgia. The project site is located on the Savannah River northeast of the corner of N. Lathrop Avenue and W. Lathrop Avenue, approximately 1.4 mile upstream of the Talmadge Bridge (US Highway 17).

1.1 Existing Structures in Jurisdiction

The site is fully developed for processing of dry bulk goods with a dock and deepwater access for large bulk vessels. The river bank at the site is fully stabilized with rip-rap, and the existing berth is routinely dredged and maintained at a depth of -40' MLW.

The existing dock consists of an approximately 110' x 90' concrete platform leading to a 210' x 25' concrete T-shaped "pierhead." Extending from the upstream end of the dock is a 270' x 7' metal grate catwalk connecting to a 9' x 12' mooring dolphin and a 12' x 15' breasting dolphin. On the downstream side of the dock is an additional 50' x 80' concrete platform which holds the docks conveyor/unloader system. An additional 290' x 8' metal grate catwalk connects to three 12' x 15' breasting dolphins on the downstream side of the dock. In all, the existing dock structure totals approximately 24,144 square feet.

The dock contains four fenders mounted on existing breasting dolphins (the most upstream dolphin does not contain a fender). A timber whaler system is also mounted to the face of the dock and supported by steel H-piles. The dock is supported by 18-inch square concrete pilings. The existing structures extend approximately 135 feet into the waterway where the waterway is approximately 900 feet wide (MLW to MLW).

1.2 Proposed Site Development Plans

The facility 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 by a system of conveyors and loaders which lead to a series of storage silos on-site. The proposed improvements include replacing the four existing fenders on the breasting dolphins and adding four new fenders to the face of the dock platform. The existing timber whaler system and support piles will be removed from the face of the existing dock prior to installation of the new cone fenders. At each of the eight fender locations, a 12' x 4' (384 sf total) concrete fender panel will be mounted to the face of the dock, each supported by two 18-inch concrete piles. The panels will extend eight feet down from the top elevation of the dock. On the face of each panel will be a cone fender with a steel frontal panel. Each fender structure will be approximately 8 feet wide and will project 5'-9" from the face of the new concrete panel (368 sf total). The existing bollards on the dock will be removed and replaced with larger (150 ton) bollards. To support the larger bollards and heavier loads placed on them, structural improvements behind the bollards is required. This includes removing a small section of decking, installing six new concrete battered piles at each of the six bollard locations, and re-installing a stronger pile cap. All of this will take place within the footprint of the existing dock. Other than pile placement to support the fenders and new pile caps, no discharge of dredged or fill material into jurisdictional waters is required for this project. Proposed impacts, including replacement of existing fenders and installation of new ones, totals 752 square feet (0.017 acre). 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. The proposed structures will extend four feet further into the waterway where the waterway is approximately 900 feet wide.

2.0 Upland Component:

It is the applicant's opinion that the project does not contain an upland component. The project consists of maintenance, repair, and replacement of existing structures. 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 facility by replacing existing fenders and bollards. The proposed dock modifications are necessary to maintain access and useability of the dock by waterborne 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 of 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.

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 during construction. To minimize the effects of the on-going operation of the terminal on manatees, the fenders were designed to maintain a minimum 3-foot standoff from the dock when a vessel is at berth. The size of the steel frontal panel is based on the vessel hull pressure limitations so that the fenders do not cause damage to the vessels. The top of the fender will be set above the waterline at all tides, and the bottom will be slightly below the waterline at high tide. The top of the steel frontal panel is limited in elevation so that it is not an obstruction to mooring lines and operations, so the panels will have to extend below the high tide line. However, there will only be eight 8-foot wide fenders (64 linear feet total) across the approximately 800 feet of mooring frontage, so obstacles for manatees only exist for 8% of the dock face. Also, the frontal panel they will not extend below MLW, and each fender will maintain at least three feet of stand-off when compressed, so it is not expected the proposed system will cause a manatee to be crushed.

With respect to sturgeon, the project requires the driving of approximately 40 18" pre-stressed concrete piles. Based on previous research and documentation, the driving of concrete pilings less than 20" in diameter is proven to have a minimal level of noise propagation into the waterway. Existing steel H-piles will be extracted from the waterway with vibratory hammer, but no steel piles installation will occur. To minimize noise levels and potential effects on marine species, a cushion block will be used on top of the concrete piles 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 6 and 10 days. Given the wide width of the river, alternative routes past the project site (Back River), limited number of piles and days of pile driving, and the applicant's noise minimization measures, it was concluded that the project will have no effect on sturgeon.

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 fenders and installing new piles under the existing dock. 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 maintenance and repair activities and does not require dredging or fill which could affect water quality.

8.0 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-

Colonial Terminals, Inc.
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-

International Paper Company
P.O. Box 2118
Memphis, TN 38101

Colonial Terminals, Inc owns the two downstream parcels.

(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;

A request for a letter and stamped/signed drawings from the City of Savannah Zoning Administrator has been made. To-date, no response has been received. SECI will provide the letter and stamped drawings to CRD upon receipt.

(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 Nationwide Permit 3 from the U.S. Army Corps of Engineers which has already be certified by EPD for Water Quality Certification. An individual 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 structures will extend the fender line of the dock approximately four feet further channelward than the existing fender line, but this will not adversely affect public navigation or commerce in the Savannah River. There will be approximately 185 feet of berth space between the fender line and the Federal Channel, so vessels will not encroach into the channel when at berth.

(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.

November 5, 2021

Mr. Josh Noble
Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way, Suite 300
Brunswick, Georgia 31520-8687

Subject: Coastal Marshlands Protection Act Minor Permit Application SECI #01-21-087
Colonial Terminals Dock 2 Fender Replacement
Chatham County, Georgia

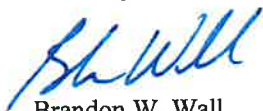
Dear Mr. Noble:

Sligh Environmental Consultants, Inc. (SECI), on behalf of Colonial Terminals, Inc. (applicant), requests authorization for improvements to the existing fender and mooring system at their Colonial Terminal Dock 2 facility in Chatham County, Georgia. The project site is located on the Savannah River northeast of the corner of N. Lathrop Avenue and W. Lathrop Avenue, approximately 1.4 mile upstream of the Talmadge Bridge (US Hwy 17). The proposed improvements include replacing four existing fenders on the breasting dolphins and adding four new fenders to the face of the existing dock platform. Minor structural upgrades are also required within the footprint of the existing dock to support the upgraded mooring hardware. The existing fenders and timber whaler system with H-piles will be removed from jurisdictional waters. Project related impacts for the new cone fenders (not subtracting the existing structures to be removed) total 752 square feet (0.017 acre). No fill or excavation activities are required, and no impacts will occur to vegetated salt marsh. The permit application includes:

- Joint Application Form
- Revocable License Request Form
- Project Area Maps
- Permit Exhibits
- CESAS Form 19 – Supporting Documentation
- Site Photographs
- Property Deed

Following your review of this information, please contact us at (912) 232-0451 should you have any questions or require any additional information.

Sincerely,



Brandon W. Wall
Project Biologist
Sligh Environmental Consultants, Inc.

Enclosures

cc: Mr. Brad Woodall – Moffatt & Nichol
USACE Savannah District (under separate cover)

November 5, 2021

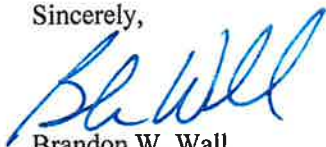
U.S. Army Corps of Engineers
Regulatory Branch, Southern Section
100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640

**Subject: Letter of Permission Request
Colonial Terminals, Inc.
Dock 2 Fender Replacement
Chatham County, Georgia**

Sligh Environmental Consultants, Inc. (SECI), on behalf of Colonial Terminals, Inc. (applicant), requests authorization for improvements to the existing fender and mooring system at their Plant 2, Dock 2 facility in Chatham County, Georgia. The project site is located on the Savannah River northeast of the corner of N. Lathrop Avenue and W. Lathrop Avenue, approximately 1.4 mile upstream of the Talmadge Bridge (US Hwy 17). The proposed improvements include replacing four existing fenders on the breasting dolphins and adding four new fenders to the face of the existing dock platform. Minor structural upgrades are also required within the footprint of the existing dock to support the upgraded mooring hardware. The existing fenders and timber whaler system with H-piles will be removed from jurisdictional waters. Project related impacts (shading) for the new cone fenders (not subtracting the existing structures to be removed) total 752 square feet (0.017 acre). No fill or excavation activities are required, and no impacts will occur to vegetated salt marsh or wetlands.

For your review, attached is a copy of the Coastal Marshlands Protections Act Permit application which includes the Joint Application Form, GIS maps, permit exhibits, and supporting narrative/description. If you have any questions or comments, or if you wish to discuss the project in further detail, please do not hesitate to contact me at (912) 232-0451.

Sincerely,



Brandon W. Wall
Project Biologist
Sligh Environmental Consultants, Inc.

Enclosures

Cc: Mr. Brad Woodall – Moffatt & Nichol
Mr. Bradley Smith – EPD
Ms. Kelie Moore – CRD