

***Scoping Meeting Report for the  
Jasper Ocean Terminal  
Environmental Impact Statement***

**SCOPING MEETING REPORT FOR THE  
JASPER OCEAN TERMINAL  
ENVIRONMENTAL IMPACT STATEMENT**

Prepared for:

U.S. Army Corps of Engineers  
Charleston District  
69 Hagood Avenue  
Charleston, South Carolina 29403

Prepared by:

Atkins  
7406 Fullerton Street  
Suite 350  
Jacksonville, Florida 32256

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## Acronyms and Abbreviations

Commission	South Carolina Savannah River Maritime Commission
Corps	U.S. Corps of Engineers
EFH	Essential Fish Habitat
EJ	Environmental Justice
EIS	Environmental Impact Statements
EPA	U.S. Environmental Protection Agency
GA EPD	Georgia Department of Environmental Protection
GDOT	Georgia Department of Transportation
GPA	Georgia Ports Authority
HTRW	Hazardous, Toxic, and Radioactive Waste
JOT	Jasper Ocean Terminal
JOT JV	Jasper Ocean Terminal Joint Venture or Applicant
LATS	Lowcountry Area Transportation Study
NEPA	National Environmental Policy Act
NGOs	non-governmental organizations
NOI	Notice of Intent
NMFS	National Marine Fisheries Service
NPS	National Park Service
SC DHEC	South Carolina Department of Health and Environmental Control
SCPA	South Carolina Ports Authority
SHEP	Savannah Harbor Expansion Project
SNWR	Savannah National Wildlife Refuge
STB	Surface Transportation Board
USFWS	United States Fish and Wildlife Service

## **1.0 INTRODUCTION**

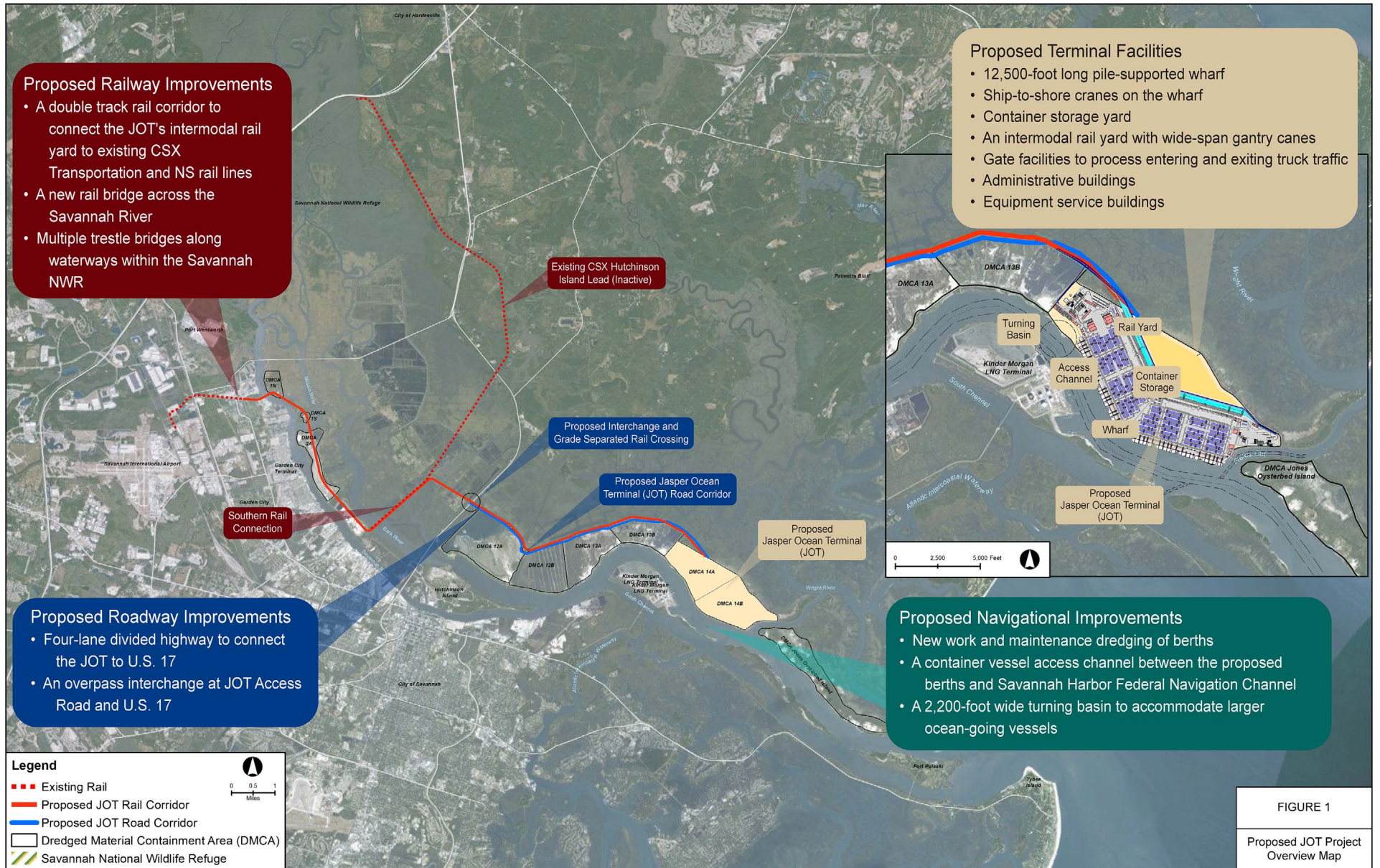
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The National Environmental Policy Act (NEPA) requires an early and open process for determining the scope of the issues to be addressed as part of the preparation of an Environmental Impact Statement (EIS). During this “NEPA scoping process,” the lead Federal agency solicits agency and public input regarding issues to be considered in the EIS. Accordingly, the U.S. Army Corps of Engineers (Corps), Charleston District, initiated the public scoping process with the publication of the Notice of Intent (NOI) in the *Federal Register* on October 21, 2016 (see Appendix A). The EIS is intended to assess the potential social, economic, and environmental effects of the proposed construction and operation of a marine container terminal by the Jasper Ocean Terminal (JOT), Joint Venture (or Applicant), a partnership between the Georgia Ports Authority (GPA) and the South Carolina Ports Authority (SCPA). The Corps conducted a public scoping meeting on January 31, 2017, to solicit public and agency comments. Comments were received during the public scoping meeting (written and oral) and during the scoping period, which ended on March 1, 2017, through email, letters, and the project website ([www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)).

The intent of the public scoping meeting and scoping period was to provide information to the public regarding the proposed project and provide a forum for input from the public that would help identify significant issues and data needs associated with the Corps’ evaluation of the proposed action, and assist in identifying other potential alternatives. The Corps will consider the information gathered during the scoping process to develop a reasonable range of alternatives that meet the project purpose, the scope of work for the reports and studies that will be used to evaluate the proposed project, and the range of reasonable and practicable alternative sites and transportation corridors that will be included in the EIS. This scoping report contains a description of the proposed JOT (additional information is available in Appendix B), documents the JOT EIS scoping process, and summarizes the agency and public comments received during the scoping period.

### **1.1 PROPOSED PROJECT**

According to the JOT Joint Venture, the Ports of Charleston and Savannah are expected to experience limitations and inefficiencies as a result of the forecasted growth in demand for containerized cargo within the region served by the two existing ports over the next 35 years. As a result, the JOT Joint Venture has proposed to construct and operate a state-of-the-art marine container terminal on an approximately 1,500-acre site in Jasper County, South Carolina. The proposed JOT would be located across the Savannah River from the existing Southern Liquid Natural Gas facility on Elba Island, Georgia, and would increase the region’s capacity to efficiently handle the forecasted growth in containerized cargo (Figure 1).



The proposed JOT would include a 12,500-foot-long pile supported wharf designed to accommodate up to eight Neo-Panamax containerships, a container storage yard, an intermodal rail yard, gate facilities to process entering and exiting over-the-road truck traffic, administrative buildings, and equipment service facilities. The proposed JOT would also include elements common to other types of industrial sites, such as a water tower, underground utilities, electrical substations, backup generators, high-mast lighting, stormwater management facilities, perimeter fencing, and parking areas for employees and visitors.

Transportation and utility improvements that would serve the proposed JOT include a 4-lane divided highway to connect the JOT to US 17, double and single track rail corridors to connect the JOT's intermodal rail yard to existing CSX Transportation and Norfolk Southern rail lines, a new rail bridge across the Savannah River, and utility lines and intermediate facilities to connect to existing services (e.g., water, sewer, electricity). Likewise, navigational improvements associated with the proposed JOT include new work and maintenance dredging of berths; an access channel; and a 2,200-foot-wide turning basin to provide vessel access to the terminal.

According to the JOT Joint Venture, a separate feasibility study will evaluate the costs and benefits of modifications (e.g., deepening and widening) to the existing Savannah Harbor federal navigation channel. Should this feasibility study or the Corps' analysis of the proposed JOT determine that modifications to the federal navigation channel are required to construct and operate the proposed marine container terminal, potential impacts to the human and natural environment (e.g., aquatic resources) associated with these additional navigational improvements will need to be evaluated and included in the EIS for the proposed JOT.

Based on the available information, development of the proposed JOT would result in the dredging of navigable waters (approximately 439 acres) and potential impacts to wetlands and other waters of the U.S. (approximately 54 acres).



## **2.0 SCOPING**

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### **2.1 PURPOSE OF SCOPING**

Participation by the public, governmental agencies, tribes, and non-governmental organizations (NGOs) is critical to the NEPA process. The purpose of scoping is to ensure participation of interested parties, such as Federal, state, tribal, and local government agencies and officials; property owners; residents; and other stakeholders and to help identify the significant issues that need to be analyzed in depth in the EIS (40 CFR 1501.7). This process also serves to deemphasize insignificant issues, narrowing the scope of the EIS process accordingly (40 CFR 1500.4(g)). Scoping results in the identification of a range of actions, alternatives, and impacts to be considered in the EIS (40 CFR 1508.25). Furthermore, the scoping process is intended to:

- Encourage interested parties to participate in the preparation of the JOT EIS;
- Provide access to information about the proposed project;
- Solicit information and comments from interested parties; and
- Facilitate effective communication between the Corps and interested parties.

### **2.2 SCOPING PROCESS SUMMARY**

The Corps has and will continue to offer opportunities for public participation and input via the project website, public and agency meetings, and review and comment of the Draft and Final EIS. Public coordination and input during the scoping process consisted of the following elements:

- Publishing an NOI in the *Federal Register* on October 21, 2016 (Appendix A);
- Distributing a local public notice on October 21, 2016 that includes information about the proposed project, and drawings that identify the layout and major components of the proposed project (Appendix B);
- Preparing and launching a website on October 21, 2016 that describes the proposed project, the NEPA process, and provides opportunities for the public to submit comments and/or to add their name to the project mailing list;
- Distributing a public notice on January 17, 2017 that includes information on the date, time, and location of the public scoping meeting for the proposed JOT (Appendix C);
- Publishing meeting announcements in local newspapers (*Savannah Morning News*, *Beaufort Today*, *Jasper County Sun*, *Bluffton Today*, and *The Island Packet and The Beaufort Gazette*) and distributing a news release to media outlets announcing the date, time, and location of the public scoping meeting;
- Developing a project mailing list of interested stakeholders, including adjacent property owners, citizens, and environmental organizations; local, state, and Federal agencies; tribes.

This mailing list will be maintained throughout the NEPA process and updated to include people that participate in future meetings or request to be added to the mailing list;

- Holding a public scoping meeting on January 31, 2017, to inform the public about the proposed action and to solicit verbal and written comments on the actions, alternatives, and impacts that the EIS should address;
- Reviewing and considering all comments received during the comment period from January 31, 2017, until March 1, 2017; and
- Publishing the scoping report online at [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com).

## **2.3 PUBLIC NOTIFICATIONS**

### **2.3.1 Notice of Intent**

As described above, the Corps prepared a “Notice of Intent to Prepare an Environmental Impact Statement for the Jasper Ocean Terminal in Jasper County, South Carolina” (NOI) that was published in the *Federal Register*, Volume 81, No. 204, on October 21, 2016. The *Federal Register* notice is included in Appendix A.

### **2.3.2 Public Notice**

On October 21, 2016, approximately 650 state and Federal agencies, elected officials, interest groups, and the general public from both the Charleston and Savannah District’s Regulatory Division mailing lists were notified by email that a local public notice was available on either the Charleston District’s website or the JOT project website. A hardcopy of the public notice is included in Appendix B. In addition, a letter was mailed to adjacent property owners. The purpose of the local public notice was to inform state and Federal agencies and other parties who might be interested or affected by the proposed action, information about the proposed project, and the EIS that is being prepared by the Corps. An additional public notice was distributed by email and/or mail to everyone on the project mailing list on January 17, 2017, to provide information about the date, time, and location of the public scoping meeting and to encourage recipients to attend and offer their input on the proposed project (see Appendix C). As described above, the public notice is available for review at the following locations:

- Charleston District Web Site at [www.sac.usace.army.mil](http://www.sac.usace.army.mil) under the “Public Notices” link in the middle of the page and following the link at “SAC-2015-01238”; and
- JOT EIS project website at [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com), under Document Library.

### **2.3.3 Meeting Announcements**

In addition, meeting announcements that identified the date, time, and location of the public scoping meeting were published in the *Savannah Morning News* on January 22 and January 29, 2017 (Figure

2); the *Beaufort Today* on January 25, 2017; the *Jasper County Sun* on January 25, 2017; the *Bluffton Today* on January 25 and January 29, 2017; and *The Island Packet* and *The Beaufort Gazette* on January 22 and January 29, 2017.

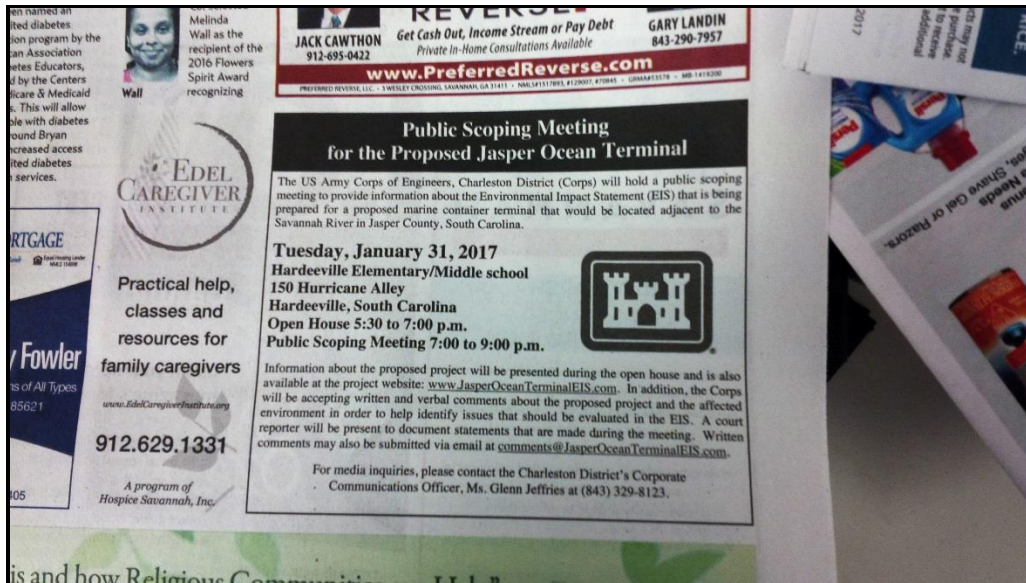


Figure 2. Meeting Announcement for the Public Scoping Meeting in the Savannah Morning News

### 2.3.4 Project Website

A JOT EIS website that contains project information as well as information about the NEPA process ([www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)) has been developed for the proposed project. The website provides an opportunity for the public to access information about the proposed project, to submit written comments throughout the preparation of the EIS, and to sign up for the project mailing list. The website was launched on October 21, 2016.

## 2.4 AGENCY AND TRIBAL CONSULTATIONS

The Corps initiated agency and tribal consultations by issuance of a NOI in the Federal Register and a local public notice on October 21, 2016. In response to the NOI and the public notice, letters or emails were received from the following Federal agencies: U.S. Fish and Wildlife Service (USFWS), National Park Service (NPS), U.S. Environmental Protection Agency (EPA), National Marine Fisheries Service (NMFS), and Surface Transportation Board (STB); and the following state and local agencies: Georgia Department of Transportation (GDOT), South Carolina Savannah River Maritime Commission (Commission), and the Policy Committee of the Lowcountry Area Transportation Study (LATS).

As of June 2017, there have also been two interagency coordination meetings, one on December 8, 2016, at the Savannah National Wildlife Refuge (SNWR), and a second one on February 1, 2017, in Savannah. The purpose of the first meeting was to introduce the proposed JOT project to agency staff and to start discussing the information that may be required for each agency to evaluate the various components of the proposed project. The second meeting focused on the range of issues that will be evaluated in the EIS and the investigations and/or studies that may be required to document the potential effects of the proposed project.

## **2.5 PUBLIC SCOPING MEETING**

A public scoping meeting was held at the Hardeeville Elementary/Middle School, 150 Hurricane Alley, Hardeeville, South Carolina 29927 on January 31, 2017. One hundred and sixty-four (164) people signed in at the welcome station for the scoping meeting.

The meeting began with an open house from 5:30 P.M. to 7:00 P.M., where poster boards and handouts were available for viewing. Subject matter experts from the Corps, the third-party contractor (Atkins, Inc.), and staff from Moffatt & Nichol (representatives of the JOT Joint Venture), were present to answer questions regarding the proposed project and NEPA process, and to solicit comments from the meeting participants. Poster boards (14 total) were used to display information about the proposed project, including the proposed marine container terminal and the road, rail, and navigational improvements; potential environmental issues; and the NEPA process. Copies of these displays are included in Appendix D of this document and are also available on the project website, under Document Library.

The District Engineer for the Charleston District, Lieutenant Colonel Matthew Luzzatto, began the formal part of the scoping meeting with a presentation at 7:00 P.M. This was followed by an overview of the Corps' regulatory authorities and the proposed JOT project by Mr. Nat Ball, the Charleston District Regulatory Project Manager, and then a few words about the proposed project by Mr. Dave Posek, a JOT Joint Venture Board Member. During his presentation, Mr. Ball also described the NEPA process and additional opportunities for public involvement. In addition, members of the public were invited to make a statement about the proposed project, to identify potential issues, or to express their concerns about potential impacts on the human or natural environment. A total of 8 people made a statement during the scoping meeting.

## **2.6 PUBLIC COMMENTS**

The scoping comment period for the proposed project was from January 31, 2017, to March 1, 2017. Written comments were submitted at the public scoping meeting; via the JOT EIS website at [www.jasperoceanterminaleis.com](http://www.jasperoceanterminaleis.com); and by U.S. mail, email, and fax. It is important to note, however, that comments about the proposed JOT will be accepted and considered throughout the NEPA process. This document includes comments that were received through March 1, 2017.

A transcript of the public scoping meeting is included as Appendix E. Copies of all original comment documents received from government agencies, non-governmental organizations (NGOs), and private citizens are included as Appendix F.

## **3.0 COMMENT ANALYSIS**

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All written comments were reviewed and grouped according to one of five sources: public (including private citizens, citizen groups, private businesses, and NGOs), local agency, state agency, Federal agency, and tribal. A summary of the scoping correspondence for each source is provided here.

### **Public**

- Three comment cards from private citizens, two letters from the Gullah Geechee Nation (one from the Sea Island Coalition and one from the Fishing Association), and one letter from the Savannah Riverkeeper were received at the public scoping meeting;
- Eight individuals made statements at the public scoping meeting;
- Four individuals submitted comments via the website, comments@JasperOceanTerminalEIS; and
- Two letters were received by U.S. mail and two letters by email from the public.

### **Local Agencies**

- One letter was received by email from a local agency.

### **State Agencies**

- Two letters were received by email from state agencies.

### **Federal Agencies**

- Two letters were received by U.S. mail and two letters by email from Federal agencies.

### **Tribal**

- Written comments were not received from any of the federally recognized Indian Tribes.

Comments received after the preparation of this scoping report will be considered and addressed in the Draft EIS.

## **3.1 COMMENT CATEGORIES**

Each comment was reviewed and then sorted into one of 24 categories. The scoping comments matrix, presented in Appendix G, identifies each of these 24 categories, and lists all the public and agency comments associated with a particular category. The comment categories are listed below:

- General
- Public Involvement/Coordination

- NEPA Process
- Alternatives/Project Design
- Socioeconomics and Environmental Justice
- Land Use and Zoning
- Recreation
- Cultural Resources
- Public Health and Safety
- Air Quality and Climate Change
- Noise/Vibration
- Aesthetics/Visual Resources/Lighting
- Traffic/Transportation
- Navigation
- Soil and Sediment Quality (e.g., cadmium levels)
- Water Resources and Stormwater Management
- Flooding/Sea Level Rise/Shoreline Erosion
- Waters of the U.S.
- Wildlife and Fisheries
- Threatened and Endangered Species and Migratory Birds
- Essential Fish Habitat (EFH)
- Hazardous, Toxic, and Radioactive Waste (HTRW)
- Mitigation
- Cumulative Impacts

### **3.2 COMMENT SUMMARIES**

This section summarizes the statements and written comments that were submitted by agencies and interested parties during scoping. The 24 categories that were used to differentiate between specific issues in Section 3.1 are grouped into five general categories (NEPA, Socioeconomics, Land Use and Transportation, Physical and Cultural Resources, and Natural Resources) in this section in order to summarize the issues. This section is not meant to be a comprehensive summary of all the comments that were submitted during scoping and that are included in Appendices E, F, and G.

The intent of this scoping report is not to provide detailed responses to specific comments that were received, but to identify the issues so they can be addressed appropriately in the EIS. Appendix F includes copies of original comment documents, grouped in the following order: Public (i.e., private citizens, citizen groups, private businesses, and NGOs, local and state agencies, Federal agencies, and tribal. The following sections summarize the major issues expressed in the comments received during the scoping period.

### **3.2.1 NEPA**

Comments were received regarding NEPA-specific topics such as the purpose and need for the proposed project, alternatives, public, agency, and other stakeholder involvement, mitigation, and cumulative impacts. Comments included concerns about potential negative and positive impacts associated with development of the proposed JOT. Comments discussed opportunities for public and agency involvement, including potential cooperating agencies and stakeholder participation in the NEPA process. Concern was also expressed that the Corps should consider alternatives that reduce resource impacts and to evaluate a range of reasonable alternatives to the proposed project including alternative corridor alignments. Additionally, comments requested that a thorough cumulative impacts analysis be included in the EIS [e.g., water quality, fish and wildlife, protected species, the regional transportation network, wetlands, energy use and greenhouse gases, and socioeconomics and Environmental Justice (EJ) communities]. Several comments requested that mitigation efforts be undertaken for all resources impacted, including traffic, light, and sound mitigation to protect surrounding properties and wildlife. Additionally, respondents wanted to know how data from the Savannah Harbor Expansion Project (SHEP) EIS and adaptive management monitoring process will be used in the JOT EIS analysis.

### **3.2.2 Socioeconomics**

Several comments and concerns were expressed about potential adverse impacts to low income, minority communities in economically disadvantaged, rural areas, from construction and operation of the proposed JOT. A request was made that the Corps identify any EJ communities likely to be impacted by the proposed project and to evaluate the potential direct, indirect, and cumulative impacts of the proposed project, including increased traffic, noise, vibration, land use, and air quality, on EJ communities within the project area.

Members of the Gullah Geechee Nation commented on the potential environmental impacts of the proposed project on the local waterways, which some residents use to sustain themselves via fishing traditions. Representatives of the Gullah Geechee Nation and other potentially affected communities also want additional opportunities to participate in meetings and to provide input during development of the EIS. In addition, there were several comments about the potential economic impacts of the proposed JOT project that relate to property values, workforce housing and transport, and the costs and benefits to the local and regional economy. Interested parties also expressed concern that property values within the surrounding area will decrease as a result of the development of the proposed JOT in conjunction with improvements to the existing liquid natural gas facilities on Elba Island.

### **3.2.3 Land Use and Transportation**

Comments relating to land use and transportation included traffic and transportation, navigation, land use, and zoning. Concern was expressed about an increase in traffic congestion and associated



health and safety issues resulting from traffic to and from the proposed JOT, and changes in traffic flow patterns, specifically the effects of increased traffic volumes from the JOT on US 17 and SC Hwy 170. There were several comments associated with increased cargo ship traffic in the existing Savannah Harbor navigation channel as a result of full build-out of the JOT and potential conflicts between passing ships, as well as with recreational vessels.

Comments regarding land use and zoning included changes to the natural and built environment of rural Jasper County from construction and operation of the proposed project, and how the project might induce urban sprawl and additional development throughout Jasper County. A request was made that the EIS evaluate the direct, indirect and cumulative impacts associated with changes in land uses and land development associated with the JOT.

### **3.2.4 Physical and Cultural Resources**

Key areas of concern related to physical resources include air quality, sea level rise, noise/vibration, visual resources and lighting, soil quality and stability, and HTRW. Several comments involved the potential air quality impacts associated with terminal operations, as well as vessel, train, and truck traffic to and from the proposed port facility. Concern was expressed about the potential long-term impacts on regional air quality associated with large-scale development induced by the project and the increased emissions from project-related traffic congestion, and whether the cumulative impacts of the project on air quality could lead to the surrounding area being classified as a non-attainment area. Another issue brought up during scoping was how the effects of climate change and anticipated sea level rise, when coupled with actions associated with the JOT, will affect Fort Pulaski National Monument.

Several comments expressed concern that environmental impacts associated with the project may be exacerbated when combined with hurricane-induced storm surge and flooding. Others commented on the role increased shipping traffic and vessel sizes, as well as the hardening of over two miles of shoreline, will have on shoreline erosion.

Many comments expressed concern about the increase in noise levels and vibrations from the increase in the number of trains and trucks (at the terminal site, on the new road and railways, and extending onto the existing regional transportation network), vessel traffic (including engine noise and fog horns), and crane container operations (including dropped containers) to regionally and nationally important resources, such as the SNWR. Several comments expressed interest in the type and location of mitigation measures that may be implemented to offset noise and vibration impacts to surrounding properties and wildlife associated with the increase in the number of trains and trucks on the local infrastructure.

Comments regarding visual resources and lighting included the ways in which light pollution from the proposed terminal site, road and railway infrastructure, and induced development areas is likely

to affect migratory birds, sea turtles, and other species, as well as those living on Richardson Creek and the surrounding areas.

Comments related to soil and sediment quality recommended a complete and thorough analysis of the dredged material on which the terminal is to be built, and the potential for contaminants leaking out of the dredge spoils, as well as how to manage any cadmium-laden sediment that might be dredged as a result of the JOT. A commenter expressed concern about the use and safety of any hazardous materials used during project construction, as well as the safe disposal, transport, and generation of hazardous waste and materials at, to, and from the terminal site.

Regarding cultural resources, comments requested an archeological study be performed on the terminal site and any other dredge spoil placement sites that would be impacted by the proposed project. GDOT, the non-federal sponsor for the Savannah Harbor navigation channel, provided information about cultural resources of concern in the vicinity of the JOT, and advised the Corps about a research study that is currently underway to explore environmental issues and factors affecting the management of Bird/Long Island.

### **3.2.5 Natural Resources**

A variety of comments were submitted regarding potential impacts to water quality, groundwater resources, waters of the U.S., wildlife and fisheries, threatened and endangered species, and EFH. Concern was expressed about the potential short- and long-term impacts on water resources from implementation of the proposed project (e.g., associated dredging activities), including water quality in the Savannah River. A request was made that the Corps collaborate with both the Georgia Department of Environmental Protection Division (GA EPD) and the South Carolina Department of Health and Environmental Control (SC DHEC) and the EPA to determine the most appropriate water quality modeling and impact analysis. Comments recommended that the following studies/analyses, if deemed necessary, be conducted: (1) an analysis on the changes of flow expected from the terminal site and the adjoining roads, including the effects on adjacent marshlands and riverine bottoms and habitat; (2) an assessment of stormwater runoff from the terminal site, associated new railway and roadway infrastructure; and (3) an evaluation of the potential impacts on groundwater resources associated with potential dredging activities, including saltwater intrusion into the Floridan aquifer.

Concern was expressed about impacts to waters of the U.S., including wetlands, and the effect that would have on wildlife and migratory birds. Other comments noted that efforts should be taken to avoid or minimize impacts to wetlands in order to benefit existing bird foraging and resting areas at the terminal site and SNWR. With regards to wildlife and fisheries, comments requested that the following be further investigated or incorporated in the EIS: (1) alterations to spawning habitat of fishes from construction of the dock and channel alterations (e.g., dredging); (2) alterations to wildlife management operations at the SNWR; (3) extent of spawning and nursery habitats in the lower Savannah River; (4) whether dredging windows used for SHEP to minimize impacts to larval

and young juvenile fish are applicable to the JOT project; (5) evaluation of impacts from predicted increases in noise pollution from both vessel traffic and operation of the terminal on spawning aggregations of sciaenid fishes; and (6) surveys of benthic communities to include both the area of impact and a 500-foot buffer around the proposed work areas.

With regards to threatened and endangered species and EFH, comments stated that (1) increased ship traffic levels are likely to lead to more vessel strikes and “take” of manatees, sea turtles, and North Atlantic right whales, requiring a Biological Opinion and take permit for the project; (2) primary initial impacts to threatened and endangered species will stem from noise impacts and other in-water disturbances associated with construction of the terminal; (3) preliminary concerns include lighting impacts to migratory birds, nesting sea turtles, and hatchlings; (4) information concerning potential “At-Risk-Species” should be considered during project planning, construction, and operation; and (5) the EFH assessment should focus on effects to salt marshes (including oysters, marsh vegetation, and mud banks) from shoreline armoring, shoreline erosion from increased vessel traffic, and hydrodynamic changes.

As described above, this section summarizes the major issues that were identified and the concerns that were expressed in the comments received during the scoping period. Once the Corps begins to gather information about the affected environment and various studies and analyses are conducted to evaluate the environmental consequences of the proposed project, the Corps may determine that some of these are more or less significant than others. Likewise, as we learn more about the proposed project and its potential impacts on the human and natural environment additional issues or concerns may be identified that need to be addressed in the EIS. Scanned copies of all original comment documents that were received during scoping are included in Appendix F.

## **4.0 FUTURE PUBLIC INVOLVEMENT**

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Opportunities for future public involvement and comment will be provided throughout the development of the EIS, including project website updates, other formal and informal meetings with interested stakeholders, interagency coordination meetings, and project newsletters. The Corps anticipates that additional community and stakeholder meetings will be scheduled once the findings of the various environmental analyses are available. In accordance with NEPA, a Notice of Availability will also be published in the *Federal Register* for both the Draft EIS and the Final EIS. The Charleston District will forward local public notices to both the Charleston and Savannah District's Regulatory Division mailing lists and the project-specific mailing list and will publish meeting announcements in local newspapers. In addition, there will be a 45-day public review period and a public hearing for the Draft EIS, and a 30-day review period for the Final EIS.

## **Appendix A**

### **Notice of Intent**

*Contracting Activity:* Department of Veterans Affairs  
*Service Type:* Administrative/General Support Service  
*Mandatory for:* Office of Personnel Management; Inspector General Office, 1900 E Street NW., Washington, DC  
*Mandatory Source(s) of Supply:* Columbia Lighthouse for the Blind, Washington, DC  
*Contracting Activity:* Office of Personnel Management  
*Service Type:* Employment Placement Service  
*Mandatory for:* Defense Logistics Agency; National Human Resource Offices, 8725 John J Kingman Rd #2545, Fort Belvoir, VA  
*Mandatory Source(s) of Supply:* Columbia Lighthouse for the Blind, Washington, DC  
*Contracting Activity:* Defense Logistics Agency Aviation  
*Service Type:* Duplicating Service  
*Mandatory for:* U.S. Army Corps of Engineers, 10 S Howard St, Baltimore, MD  
*Mandatory Source(s) of Supply:* North Central Sight Services, Inc., Williamsport, PA  
*Contracting Activity:* Dept of the Army, W40M NORTHEREGION Contract Ofc  
*Service Type:* Administrative Service  
*Mandatory for:* General Services Administration, 100 Penn Square East, Philadelphia, PA  
*Mandatory Source(s) of Supply:* Center for the Blind and Visually Impaired, Chester, PA  
*Contracting Activity:* General Services Administration, FPDS Agency Coordinator  
*Service Type:* Administrative/General Support Service  
*Mandatory for:* GSA, Southwest Supply Center, 819 Taylor Street, Fort Worth, TX  
*Mandatory Source(s) of Supply:* NewView Oklahoma, Inc., Oklahoma City, OK  
*Contracting Activity:* General Services Administration, FPDS Agency Coordinator  
*Service Type:* Customer Service Representatives  
*Mandatory for:* GSA, Philadelphia Region 3: Federal Supply Service Bureau, Philadelphia, PA  
*Mandatory Source(s) of Supply:* Center for the Blind and Visually Impaired, Chester, PA  
*Contracting Activity:* General Services Administration, FPDS Agency Coordinator  
*Service Type:* Parts Machining Service  
*Mandatory for:* Mare Island Naval Shipyard, Vallejo, CA  
*Mandatory Source(s) of Supply:* West Texas Lighthouse for the Blind, San Angelo, TX  
*Contracting Activity:* DOD/DEPARTMENT OF THE NAVY  
*Service Type:* Medical Transcription Service  
*Mandatory for:* Patuxent River Naval Air Station; U.S. Naval Hospital, 47149 Buse Road, Unit 1370, Patuxent River, MD  
*Mandatory Source(s) of Supply:* Lighthouse for the Blind of Houston, Houston, TX  
*Contracting Activity:* DOD/DEPARTMENT

OF THE NAVY  
*Service Type:* Order Processing Service  
*Mandatory for:* Federal Prison Industries, Lexington, KY  
*Mandatory Source(s) of Supply:* Clovernook Center for the Blind and Visually Impaired, Cincinnati, OH  
*Contracting Activity:* Federal Prison System, Central Office  
*Service Type:* Photocopying Service  
*Mandatory for:* James E. Van Zandt Veterans Affairs Medical Center, 2907 Pleasant Valley Blvd., Altoona, PA  
*Mandatory Source(s) of Supply:* North Central Sight Services, Inc., Williamsport, PA  
*Contracting Activity:* Department of Veterans Affairs  
*Service Type:* HTML Coding of Forest Health Monitoring Service  
*Mandatory for:* USDA, Forest Service, North Central Forest Experiment Station, St. Paul, MN  
*Mandatory Source(s) of Supply:* North Central Sight Services, Inc., Williamsport, PA  
*Contracting Activity:* Dept of Agriculture, Procurement Operations Division  
*Service Type:* Duplicating Service  
*Mandatory for:* U.S. Army Corps of Engineers, 100 Liberty Avenue, Pittsburgh, PA  
*Mandatory Source(s) of Supply:* North Central Sight Services, Inc., Williamsport, PA  
*Contracting Activity:* Dept of the Army, W40M NORTHEREGION Contract Ofc

**Barry S. Lineback,**

*Director, Business Operations.*

[FR Doc. 2016-25531 Filed 10-20-16; 8:45 am]

**BILLING CODE 6353-01-P**

**DEPARTMENT OF DEFENSE**

**Department of the Army, Corps of Engineers**

**Intent To Prepare an Environmental Impact Statement for the Jasper Ocean Terminal in Jasper County, South Carolina**

**AGENCY:** Department of the Army, U.S. Army Corps of Engineers, DOD.

**ACTION:** Notice of intent.

**SUMMARY:** The U.S. Army Corps of Engineers (Corps), Charleston District intends to prepare an Environmental Impact Statement (EIS) to assess the potential social, economic, and environmental effects of the proposed construction and operation of a marine container terminal by the Jasper Ocean Terminal (JOT) Joint Venture, a partnership between the Georgia Ports Authority (GPA) and the South Carolina Ports Authority (SCPA). In accordance with the National Environmental Policy Act (NEPA), the Corps is the lead Federal agency responsible for the

preparation of the EIS. Information included in the EIS will serve as the basis for the Corps' evaluation of the proposed marine container terminal pursuant to Section 10 of the Rivers and Harbors Act (RHA) and Section 404 of the Clean Water Act (CWA). The EIS will assess the potential effects of the proposed project and a range of reasonable project alternatives on impacts to navigable waters and other waters of the United States. The EIS will also provide information for Federal, State, and local agencies having other jurisdictional responsibility.

**DATES: Public Scoping Meeting:** A public scoping meeting has not been scheduled; however, a local public notice will be issued by the Charleston District, and a meeting announcement will be published in local newspapers once the date and location for the scoping meeting has been determined. Individuals and organizations that are interested in the proposed JOT or whose interests may be affected by the proposed work are encouraged to attend the scoping meeting to submit oral and/or written comments to the Charleston District.

**FOR FURTHER INFORMATION CONTACT:** For further information and/or questions about the proposed project or the NEPA process, please contact Mr. Nat Ball, the Corps Project Manager, by telephone: 843-329-8044 or toll-free 1-866-329-8187, or by mail: Mr. Nat Ball, U.S. Army Corps of Engineers, 69-A Hagood Avenue, Charleston, South Carolina 29403.

**SUPPLEMENTARY INFORMATION:** The Corps is evaluating a proposal from the JOT Joint Venture in accordance with Section 404 of the CWA, Section 10 of the RHA, and NEPA. Based on the available information, the Corps has determined that the proposed JOT has the potential to significantly affect the quality of the human and natural environment, and therefore warrants the preparation of an EIS. Additional information about the proposed project and the NEPA process is available on the project Web site at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com).

1. *Description of the Proposed Project.* According to the JOT Joint Venture, the Ports of Charleston and Savannah are expected to experience limitations and inefficiencies as a result of the forecasted growth in demand for containerized cargo within the region served by the two existing ports over the next 35 years. As a result, the JOT Joint Venture has proposed to construct and operate a state of the art marine container terminal on an approximately 1,500-acre site in Jasper County, South

Carolina. The proposed JOT would be located across the Savannah River from Elba Island, Georgia, and would increase the region's capacity to efficiently handle the forecasted cargo.

The proposed JOT would include a pile supported wharf designed to accommodate Neo-Panamax containerships, a container storage yard, an intermodal rail yard, gate facilities to process entering and existing over the road truck traffic, administrative buildings, and equipment service facilities. The proposed JOT would also include elements common to other types of industrial sites, such as a water tower, underground utilities, electrical substations, backup generators, high-mast lighting, stormwater management facilities, perimeter fencing, and parking areas for employees and other personal vehicles.

Proposed transportation and utility improvements that would serve the proposed JOT include a 4-lane divided highway to connect the JOT to U.S. Highway 17, a double track rail corridor to connect the JOT's intermodal rail yard to existing CSX Transportation and Norfolk Southern rail lines, a new rail bridge across the Savannah River, and utility lines and intermediary facilities to connect to existing services (water, sewer, electricity, etc). Likewise, navigation improvements associated with the proposed JOT include new work and maintenance dredging of berths, an access channel, and a turning basin to provide vessel access to the terminal, and shoreline stabilization, bulkhead, and wharf construction adjacent to the existing Savannah Harbor federal navigation channel.

According to the JOT Joint Venture, a separate feasibility study will evaluate the costs and benefits of modifications to the existing Savannah Harbor Federal navigation channel. Should this feasibility study or the Corps' analysis of the proposed JOT determine that modifications to the federal navigation channel are required to operate the proposed marine container terminal, potential impacts to the human and natural environment (e.g., aquatic resources) associated with any navigational improvements will be evaluated and included in the EIS for the proposed JOT.

**2. Alternatives.** A range of reasonable alternatives to the proposed action will be identified, and fully evaluated in the EIS, including: The No-Action Alternative, the applicant's proposed alternative, and alternatives that may result in avoidance and minimization of impacts; however, this list is not exclusive and additional alternatives may be considered for inclusion.

**3. Scoping and Public Involvement Process.** A scoping meeting will be conducted to gather information on the scope of the project and the alternatives to be addressed in the EIS. Additional public and agency involvement will be sought through the implementation of a public involvement plan and agency coordination.

**4. Significant issues.** Issues and potential impacts associated with the proposed JOT that are likely to be given detailed analysis in the EIS include, but are not necessarily limited to: Existing and proposed transportation infrastructure (roadways and railways), waters of the United States, air quality, noise, light, Environmental Justice, visual resources/aesthetics, general environmental concerns, cultural resources, fish and wildlife values, protected species, flood hazards, floodplain values, land use, recreation, water quality, hazardous materials and solid waste, socioeconomic, safety, and in general, the needs and welfare of the people.

**5. Additional Review and Consultation.** Additional review and consultation, which will be incorporated into the preparation of the EIS, will include, but will not necessarily be limited to, Section 14 of the RHA; Section 401 of the CWA; Essential Fish Habitat (EFH) consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act; the Endangered Species Act; Fish and Wildlife Coordination Act; National Historic Preservation Act; and the South Carolina Coastal Zone Management Act.

**6. Availability of the Draft EIS.** At this time, the Corps expects the Draft EIS to be made available to the public in late fall/winter 2020. A Public Hearing will be held during the public comment period for the Draft EIS.

**Matthew W. Luzzatto,**

*Lieutenant Colonel, U.S. Army Corps of Engineers, Charleston District.*

[FR Doc. 2016-25519 Filed 10-20-16; 8:45 am]

**BILLING CODE 3720-58-P**

## DEPARTMENT OF DEFENSE

**Department of the Army, U.S. Army Corps of Engineers**

## DEPARTMENT OF THE INTERIOR

**Bureau of Reclamation**

### **Notice of Availability of the Final Environmental Impact Statement for the Lower Yellowstone Intake Diversion Dam Fish Passage Project, Dawson County, Montana**

**AGENCY:** Department of the Army, U.S. Army Corps of Engineers, DoD; Bureau of Reclamation, Interior.

**ACTION:** Notice.

**SUMMARY:** The U.S. Army Corps of Engineers (Corps) and Reclamation, as joint lead agencies, have prepared and made available the Lower Yellowstone Intake Diversion Dam Fish Passage Project Final Environmental Impact Statement (Final EIS). The Final EIS analyzes and discloses potential effects associated with the proposed Federal action to improve passage for endangered pallid sturgeon and other native fish at Intake Diversion Dam in the lower Yellowstone River while continuing the effective and viable operation of the Lower Yellowstone Project.

**DATES:** The Corps and Reclamation will not issue a final decision on the proposed action until at least 30 days after the date that the Environmental Protection Agency publishes notice of availability of the Final EIS. After the Final EIS has been available for 30 days, the Corps and Reclamation may complete a Record of Decision. The Record of Decision will state the action that the Corps and Reclamation select for implementation and will discuss factors considered in the decision.

**ADDRESSES:** The Final EIS may be viewed on Reclamation's Web site at [www.usbr.gov/gp/mtao/loweryellowstone](http://www.usbr.gov/gp/mtao/loweryellowstone). Send requests for copies of the Final EIS to U.S. Army Corps of Engineers Omaha District, ATTN: CENWO-PM-AA, 1616 Capitol Ave. Omaha, NE 68102; or email to [cenwo-planning@usace.army.mil](mailto:cenwo-planning@usace.army.mil). See the **SUPPLEMENTARY INFORMATION** section for locations where copies of the Final EIS are available for public review.

**FOR FURTHER INFORMATION CONTACT:** Ms. Tiffany Vanosdall, U.S. Army Corps of Engineers, 1616 Capitol Ave. Omaha, NE 68102, or [tiffany.k.vanosdall@usace.army.mil](mailto:tiffany.k.vanosdall@usace.army.mil).

**SUPPLEMENTARY INFORMATION:** The Corps and Reclamation are issuing this notice

## **Appendix B**

### **Public Notice and Press Releases**



**Public Notice**  
**October 21, 2016**  
**U.S. Army Corps of Engineers**  
**Charleston District**

**Notice of Intent to Prepare a Draft Environmental Impact Statement for the  
Proposed Jasper Ocean Terminal in Jasper County, South Carolina, P/N SAC 2015-01238**

The Jasper Ocean Terminal (JOT) Joint Venture, a partnership between the Georgia Ports Authority (GPA) and the South Carolina Ports Authority (SCPA), has submitted a proposal to construct a state-of-the-art marine container terminal in Jasper County, South Carolina. According to the JOT Joint Venture, the Ports of Charleston and Savannah are expected to experience limitations and inefficiencies in the future as a result of forecasted growth in the demand for containerized cargo within the region. The proposed JOT would accommodate an additional 7 million Twenty-Foot Equivalent Units (TEUs) per year. When added to the capacity of existing port facilities and planned improvements that are being developed by the GPA and SCPA, the proposed JOT would help meet the demand for containerized cargo within the region for the next 35 years.

Based on the available information, development of the proposed JOT would result in the dredging of navigable waters (approximately 439 acres) and potential impacts to wetlands and other waters of the U.S. (approximately 54 acres). Therefore, a Department of the Army permit pursuant to Section 10 of the Rivers and Harbors Act (RHA) and Section 404 of the Clean Water Act (CWA) is required. The U.S. Army Corps of Engineers (Corps), Charleston District (SAC) has also determined that the construction and operation of the proposed JOT has the potential to significantly affect the quality of the human environment and therefore warrants the preparation of an Environmental Impact Statement (EIS).

In accordance with the National Environmental Policy Act (NEPA), a Notice of Intent has been published in the Federal Register. The purpose of the Notice of Intent and this local public notice is to inform the public that the Corps is preparing an EIS to evaluate the proposed JOT. A public scoping meeting has not been scheduled at this time. However, a second public notice will be prepared by SAC, and meeting announcements will be published in local newspapers once the date and location for the public scoping meeting have been determined. In the meantime, individuals and organizations that are interested in the proposed JOT or whose interests may be affected by the proposed work are encouraged to review the available information on the project website ([www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)).

**Background:** On March 12, 2007, the Governor of Georgia and the Governor of South Carolina signed a Term Sheet that identified the construction of a new marine cargo terminal in Jasper County, South Carolina, and the expansion of existing terminals in Georgia as the most practical means of increasing the cargo handling capacity of both states. During the past 5-7 years, the two ports authorities have purchased a 1,518-acre site adjacent to the Savannah River, gathered

preliminary information as part of their due diligence, and executed a Joint Venture Agreement that describes their plan to design, construct, operate, and jointly own the proposed JOT.

On November 24, 2015, the JOT Joint Venture provided the Corps with a general description of the proposed JOT and requested that the Corps initiate the NEPA process. Since NEPA and the Corps' regulations provide for the use of third party contracts during the preparation of an EIS, the JOT Joint Venture and the Corps worked together to develop a preliminary scope of work and to select a third party contractor. The term "third party contract" refers to a contractor that is paid by the applicant, but works at the direction of the Federal agency responsible for preparation of the EIS. The Corps and the JOT Joint Venture selected Atkins North America, Inc. to assist the Corps during the preparation of the EIS.

**Scoping:** NEPA is considered the "basic national charter for protection of the environment" and it contains provisions that require Federal agencies to integrate environmental values into their decision-making processes by considering the potential effects of their proposed actions and reasonable alternatives to those actions. One of the basic tenets of these regulations is that comprehensive information is made available to public officials and citizens before decisions are made or actions are taken. This information must be of high quality and must contain accurate scientific analysis which will be documented in an EIS.

The Corps, as lead agency for the EIS, is currently reviewing preliminary information about the proposed JOT and plans to hold a public scoping meeting during the first quarter of 2017. One of the primary goals of scoping is to identify significant issues that need to be analyzed in depth in the EIS and to identify and eliminate from detailed study issues that are not significant or that have already been covered by other environmental reviews. Public and agency involvement are essential to the process of identifying significant issues, obtaining relevant information based on personal knowledge or experience, and defining the scope of the EIS.

A public notice inviting Federal, State, and local agencies, any affected Indian tribe, and other interested parties to participate in scoping will be issued by the Corps approximately 30 days before the public scoping meeting.

**Proposed Project:** According to the JOT Joint Venture, long-term forecasts for containerized cargo predict continuing growth within the Southeastern U.S. driven by steady population increases throughout the region over the next 50 years. The Ports of Charleston and Savannah both operate at high volumes today and are expected to experience limitations and inefficiencies as a result of this forecasted growth in demand within the next 10 to 20 years. The proposed JOT would be located across the Savannah River from an existing Liquid Natural Gas Facility on Elba Island, Georgia, (**Exhibits 1 & 2**) and would increase the region's capacity to efficiently handle the forecasted growth in containerized cargo.

The proposed JOT includes a 12,500-foot long pile supported wharf designed to accommodate up to eight Neo-Panamax containerships, a container storage yard, an intermodal rail yard, gate facilities to process entering and existing over the road truck traffic, administrative buildings, and equipment service facilities (**Exhibit 3**). The proposed JOT would also include elements common to other types of industrial sites, such as a water tower, underground utilities, electrical substations,

backup generators, high-mast lighting, stormwater management facilities, perimeter fencing, and parking areas for employees and other personal vehicles.

Proposed transportation and utility improvements that would serve the proposed JOT include a 4-lane divided highway to connect the JOT to U.S. Highway 17 (**Exhibit 4A**), a double track rail corridor to connect the JOT's intermodal rail yard to existing CSX Transportation and Norfolk Southern rail lines (**Exhibit 2**), a new rail bridge across the Savannah River (**Exhibit 4C**), and utility lines and intermediary facilities to connect to existing services (water, sewer, electricity, etc). Proposed navigation improvements include new work and maintenance dredging of berths, an access channel, and a 2,200-foot wide turning basin to provide vessel access to the existing Savannah Harbor federal navigation channel.

According to the JOT Joint Venture, a separate feasibility study will evaluate the costs and benefits of modifications to the existing Savannah Harbor Federal navigation channel. Should this feasibility study or the Corps' analysis of the proposed JOT determine that modifications to the federal navigation channel are required to operate the proposed marine container terminal, potential impacts to the human and natural environment (e.g., aquatic resources) associated with any navigational improvements will be evaluated and included in the EIS for the proposed JOT.

**Public Outreach:** At present, the following methods are planned to keep you informed and obtain your input.

- A) *Project Website:* [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com). Information and updates about the proposed JOT will be available on the project website throughout the NEPA process. Frequently Asked Questions (FAQ), descriptions of the proposed project, explanation of terminology, plan view drawings, a project schedule, meeting announcements, and an overview of the NEPA process are examples of the information that will be available at the project website. Visitors to the website will also be able to register for the project mailing list, sign up for an e-mail notification system, request copies of documents, and submit comments via a standard comment form.
- B) *Public Meetings and Workshops:* If you are a representative of a group or organization that you believe is a stakeholder in the proposed project, please introduce yourself to a Corps representative at the public scoping meeting and/or through written comments following the meeting. Future information workshops, public meetings, and/or public hearings will be announced on the project website and through the project mailing list.
- C) *Project Updates:* Project updates (public notices, newsletters, etc.) will be distributed at certain milestones during the NEPA process. These updates will normally highlight the status of the NEPA process, the preliminary findings of specific reports or studies, and/or new information about the proposed JOT.

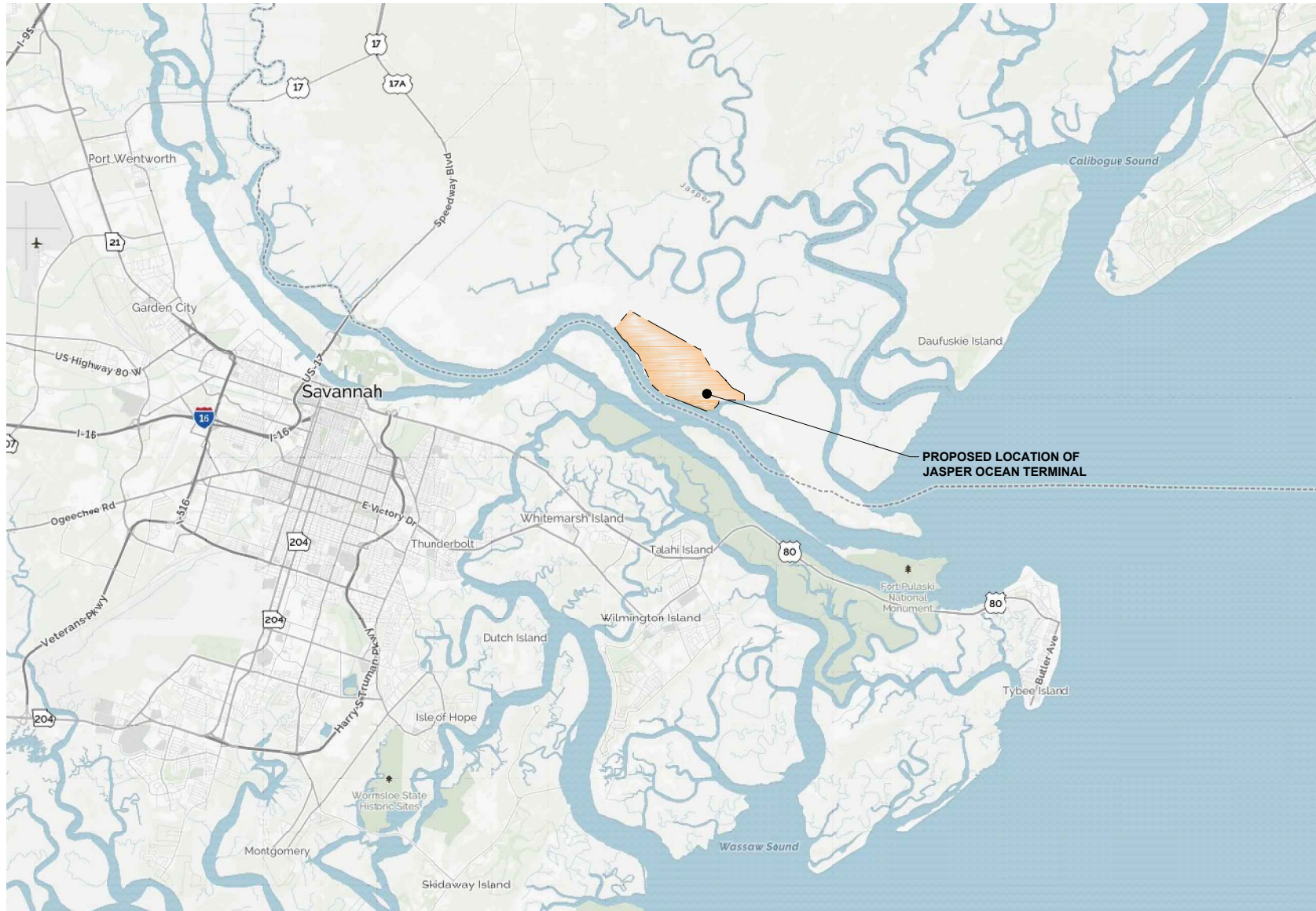
**Additional Review and Consultation:** Additional review and consultation, which will be incorporated into the preparation of the EIS, will include, but will not necessarily be limited to, Section 14 of the RHA, Section 401 of the CWA; Essential Fish Habitat consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act; the Endangered Species Act; Fish and Wildlife Coordination Act; National Historic Preservation Act; and the South Carolina Coastal Zone Management Act.

**Contact Information:** For further information and/or questions about the proposed project, please contact Mr. Nat Ball, Corps Project Manager, by telephone at 843-329-8044 or toll free at 866-329-8187, or by mail, email or via the project webpage at the addresses provided below.

- U.S. Army Corps of Engineers, Charleston District  
c/o Nat Ball, Special Projects Branch  
69-A Hagood Avenue  
Charleston, South Carolina 29403
- Project website – [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)
- Project email – [www.comments@JasperOceanTerminalEIS.com](mailto:www.comments@JasperOceanTerminalEIS.com)

For inquiries from the media, please contact the Corps, Charleston District Corporate Communications Officer (CCO), Ms. Glenn Jeffries by telephone: 843-329-8123.

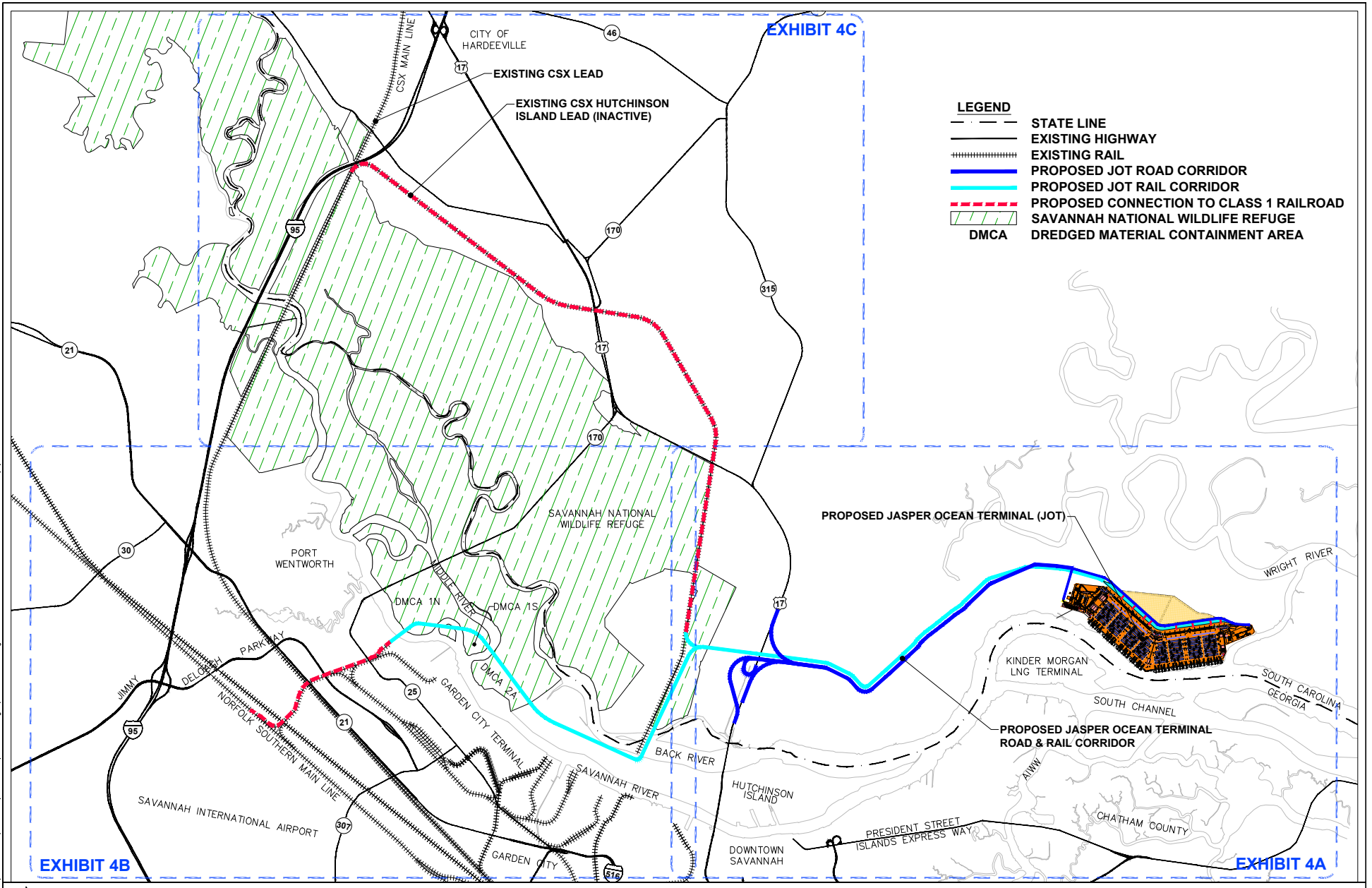
**Attachment A: Conceptual Drawings of the  
Proposed Jasper Ocean Terminal**



### EXHIBIT 1 - VICINITY MAP



DWG INFO: c:\s\9238\600 CADD\...\_Exhibits\8.5 x 11 Figs\OverallPlan.dwg; October 4, 2016 - 11:07 AM; BLOCHE; (C) MOFFATT AND NICHOL



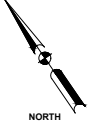
LEGEND	
	STATE LINE
	EXISTING HIGHWAY
	EXISTING RAIL
	PROPOSED JOT ROAD CORRIDOR
	PROPOSED JOT RAIL CORRIDOR
	PROPOSED CONNECTION TO CLASS 1 RAILROAD
	SAVANNAH NATIONAL WILDLIFE REFUGE
	DMCA
	DREDGED MATERIAL CONTAINMENT AREA

EXHIBIT 4B

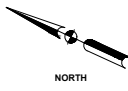
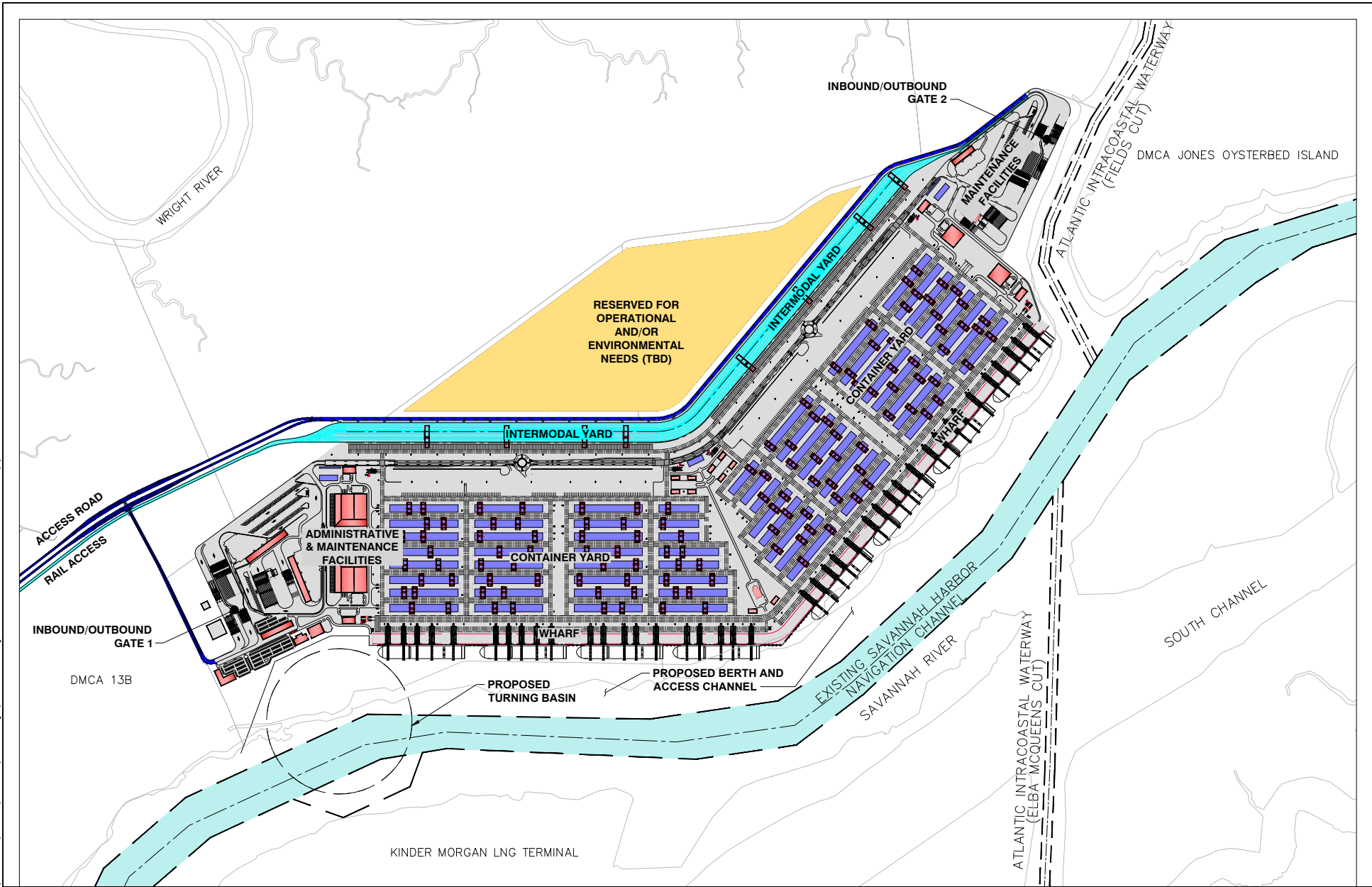
EXHIBIT 4C

EXHIBIT 4A

### EXHIBIT 2 - PROJECT OVERVIEW



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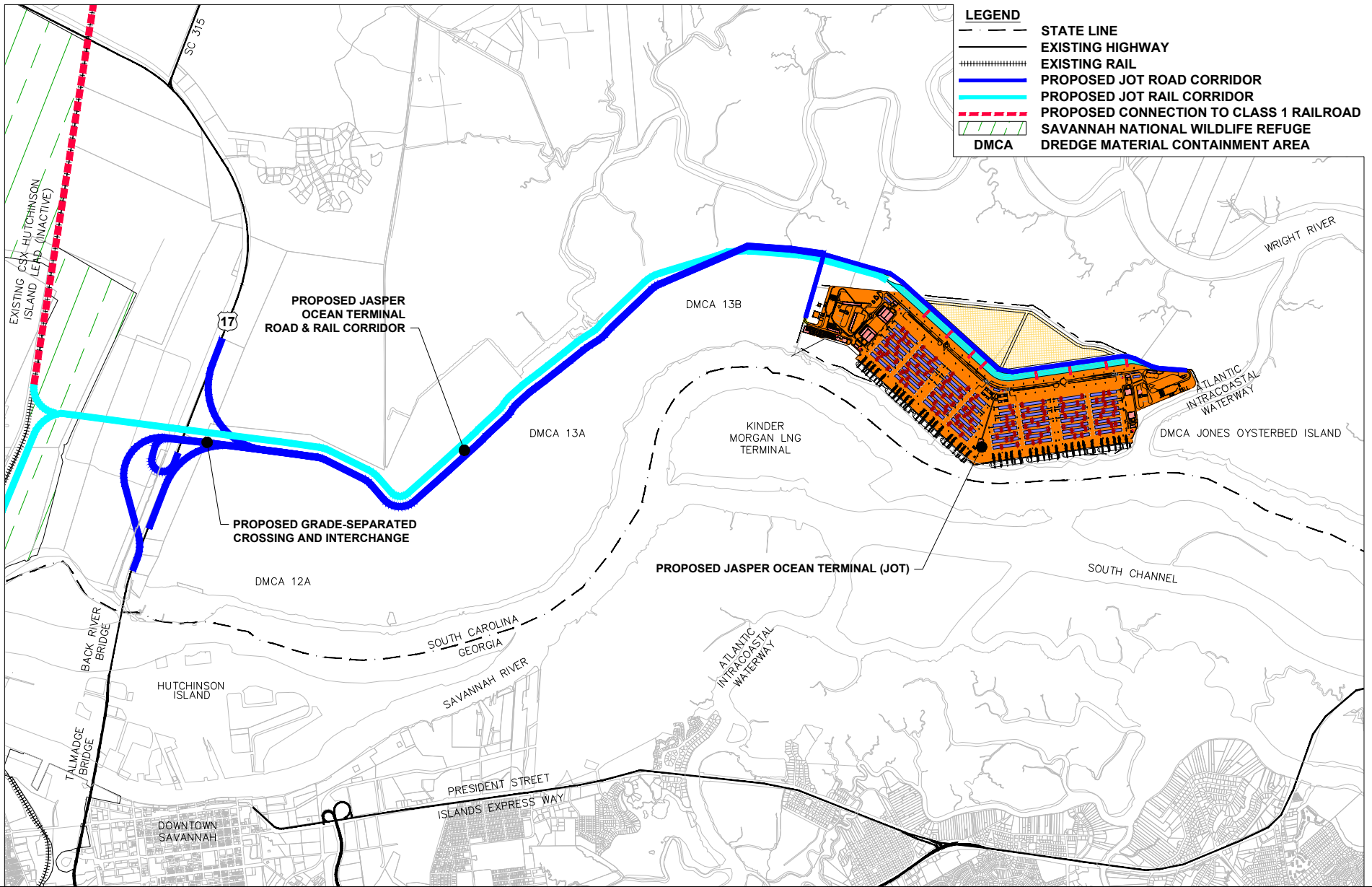
**LEGEND**  
 ——— EXISTING CHANNEL LIMITS  
 DMCA DREDGE MATERIAL CONTAINMENT AREA

**EXHIBIT 3 - PROPOSED TERMINAL**





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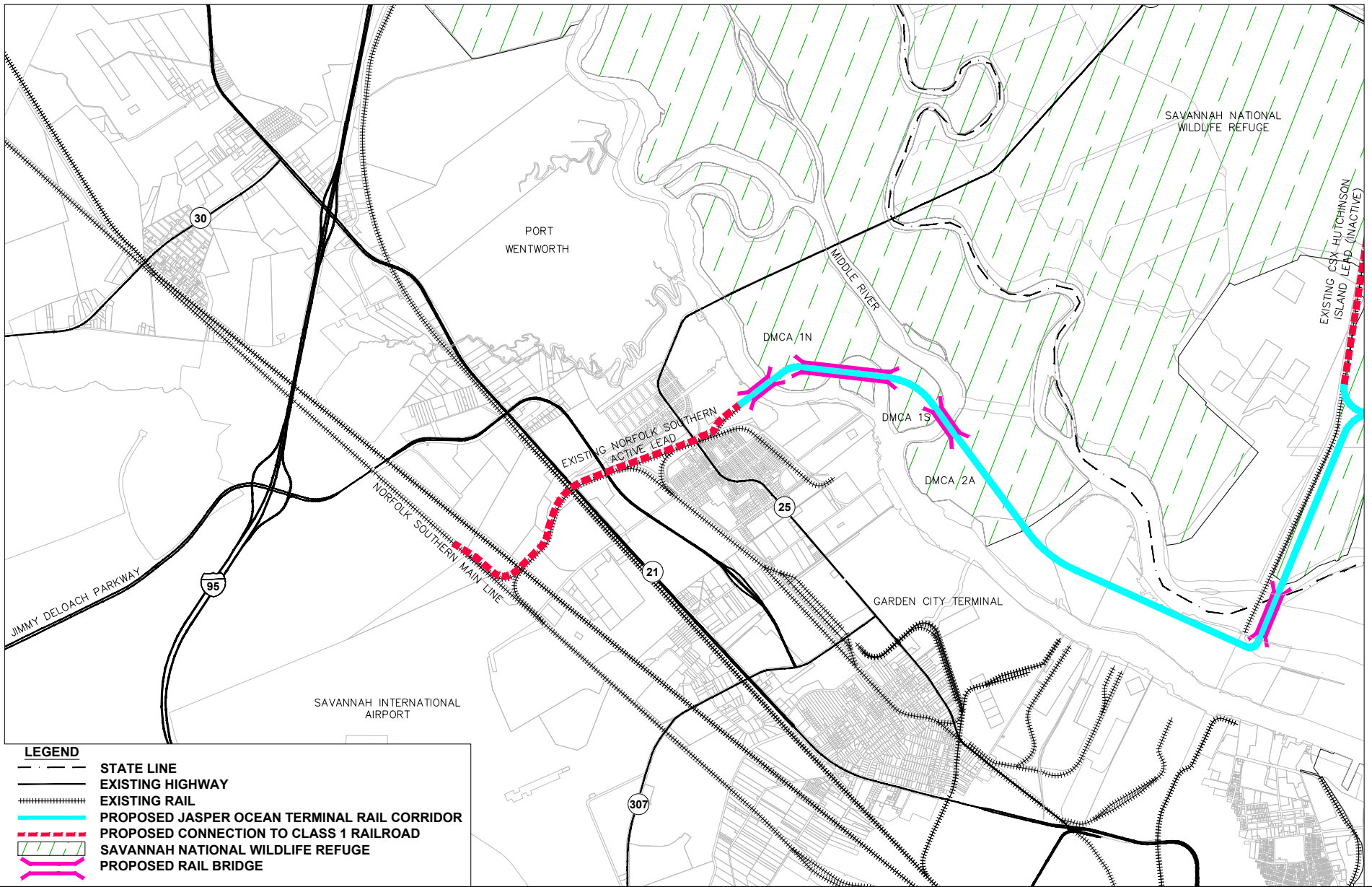
LEGEND	
	STATE LINE
	EXISTING HIGHWAY
	EXISTING RAIL
	PROPOSED JOT ROAD CORRIDOR
	PROPOSED JOT RAIL CORRIDOR
	PROPOSED CONNECTION TO CLASS 1 RAILROAD
	SAVANNAH NATIONAL WILDLIFE REFUGE
	DREDGE MATERIAL CONTAINMENT AREA

### EXHIBIT 4A - ENLARGED PLAN PROPOSED ROAD AND RAIL CORRIDORS

0 1/2 MILE

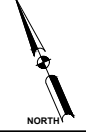


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**LEGEND**

- STATE LINE
- EXISTING HIGHWAY
- EXISTING RAIL
- PROPOSED JASPER OCEAN TERMINAL RAIL CORRIDOR
- PROPOSED CONNECTION TO CLASS 1 RAILROAD
- SAVANNAH NATIONAL WILDLIFE REFUGE
- PROPOSED RAIL BRIDGE

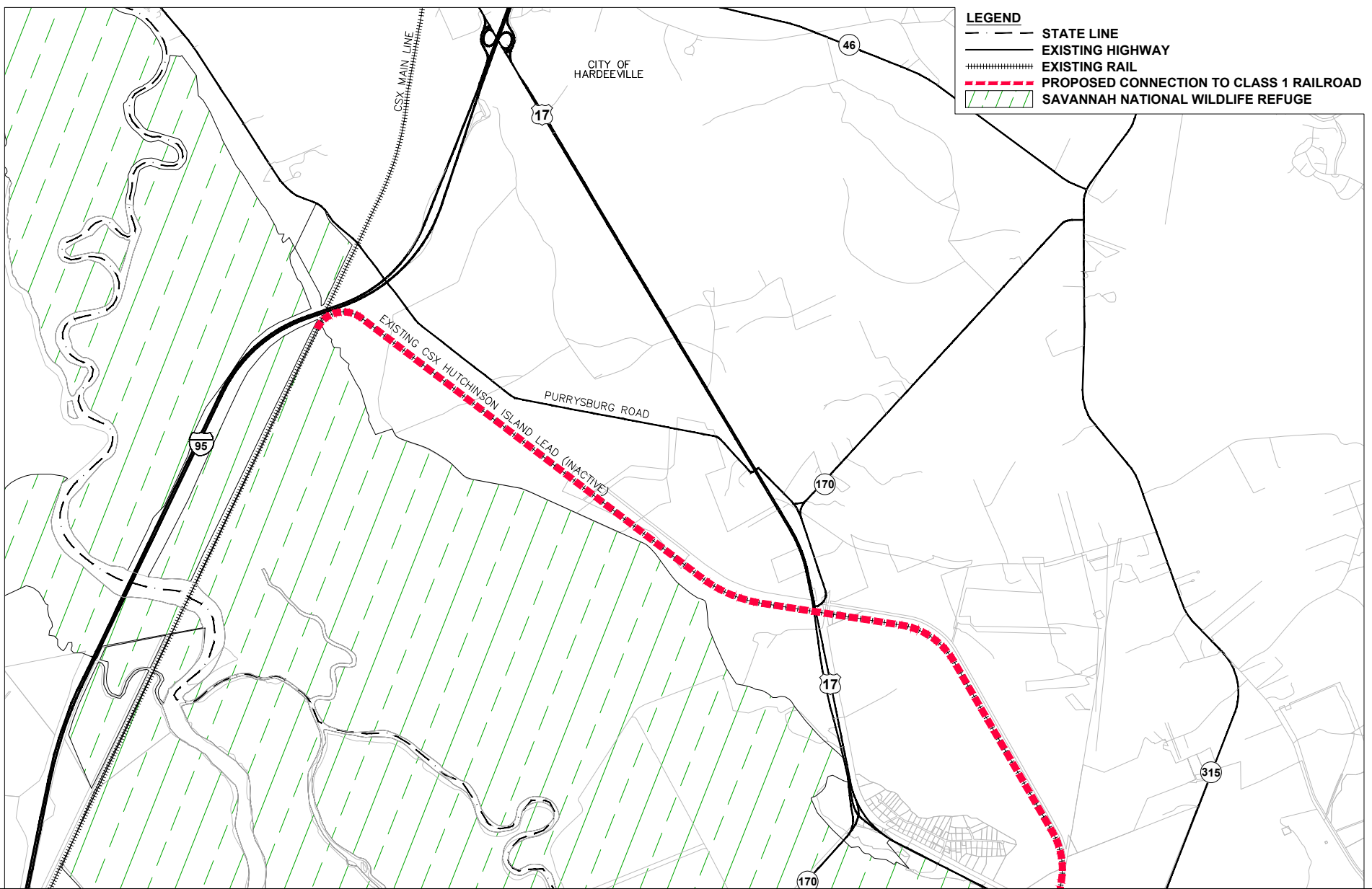


**EXHIBIT 4B - ENLARGED PLAN  
SOUTHERN RAIL CONNECTION**

0 1/2 MILE



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**LEGEND**

- STATE LINE
- EXISTING HIGHWAY
- EXISTING RAIL
- PROPOSED CONNECTION TO CLASS 1 RAILROAD
- SAVANNAH NATIONAL WILDLIFE REFUGE

**EXHIBIT 4C - ENLARGED PLAN  
NORTHERN RAIL CONNECTION**

0 1/2 MILE



**Attachment B: Preliminary List of Issues  
to be Addressed in the EIS**

## Preliminary List of Issues that May Be Addressed In The EIS

Transportation – Roadways and Railroads	Navigation
Water Resources – Stormwater Runoff and Groundwater	Federally Listed Threatened or Endangered Species
Wetlands and Waters of the U.S.	Sediment Quality and Dredging
Land Use and Zoning	Noise and Vibration
Flood Hazards and Floodplain Values	Air Quality
Socioeconomics and Environmental Justice	Visual Resources/Aesthetics
Fish and Wildlife Values	Light
Historic Properties	Recreation
Public Health and Safety	Sea Level Rise and Shoreline Erosion
Hazardous Waste and Materials	Energy Use and Greenhouse Gases

## **Appendix C**

### **Public Scoping Meeting Notices**

**Public Notice**  
January 17, 2017  
**U.S. Army Corps of Engineers**  
**Charleston District**

**Public Scoping Meeting for the Proposed Jasper Ocean Terminal**  
**Jasper County, South Carolina, P/N SAC 2015-01238**

On October 21, 2016, a Notice of Intent was published in the Federal Register and the U.S. Army Corps of Engineers (Corps), Charleston District issued a local public notice about the proposed Jasper Ocean Terminal (JOT). The JOT Joint Venture, a partnership between the Georgia Ports Authority and the South Carolina Ports Authority, has submitted a proposal to develop a new marine container terminal that would be located adjacent to the Savannah River in Jasper County, South Carolina. Information about the JOT and the associated road, rail, and navigation improvements is available at the project website: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com).

In accordance with the National Environmental Policy Act, the Charleston District is preparing an Environmental Impact Statement (EIS) to assess the potential social, economic, and environmental effects of the proposed JOT. Information included in the EIS will serve as the basis for the Corps' evaluation of the proposed project pursuant to Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act. Individuals and organizations that are interested in the proposed JOT or whose interests may be affected by the proposed work are encouraged to attend the public scoping meeting and to submit written and/or verbal comments about the proposed project in order to help identify issues that should be evaluated in the EIS.

<b>WHAT</b>	Public Scoping Meeting	
<b>WHEN</b>	Tuesday, January 31, 2017	Open House 5:30-7:00 PM Scoping Meeting 7:00-9:00 PM
<b>WHERE</b>	Hardeeville Elementary/Middle School 150 Hurricane Alley Hardeeville, South Carolina 29927	
<b>WHY</b>	The Corps will be accepting comments about the proposed project in order to help identify issues that should be evaluated in the EIS.	
<b>COMMENT DEADLINE</b>	March 1, 2017 (30 days after Scoping Meeting)	

Posters and displays about the proposed marine container terminal and the associated road, rail, and navigation improvements will be available for review during the open house. At 7:00 PM the Corps and the JOT Joint Venture will provide a brief introduction, and interested parties will have an opportunity to address the Charleston District's Commander and to make a statement about the proposed project.

For further information about the proposed project, please contact the project manager, Mr. Nat Ball, by phone at 843-329-8044 or by email at [comments@JasperOceanTerminal.com](mailto:comments@JasperOceanTerminal.com). For inquiries from the media, please contact the Charleston District's Corporate Communications Officer, Ms. Glenn Jeffries, by phone at 843-329-8123.

## **Appendix D**

### **Scoping Meeting Displays**





# Welcome to the

# Public Scoping Meeting



US Army Corps  
Of Engineers®  
Charleston District

The U.S. Army Corps of Engineers welcomes you to the  
Jasper Ocean Terminal Project  
Public Scoping Meeting

January 31, 2017

We are here tonight to present information about the proposed project  
and give you the opportunity to participate.

We want to hear from you about the proposed Jasper Ocean Terminal.  
What are your comments, questions, and concerns?

Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)



# Contact Us



US Army Corps  
Of Engineers®  
Charleston District

**Who do you contact for more information  
or  
to provide comments on the project?**

**Mail**

**U.S. Army Corps of Engineers  
Charleston District  
c/o Nat Ball  
69-A Hagood Avenue  
Charleston, SC 29403**

**E-mail**

**[comments@JasperOceanTerminalEIS.com](mailto:comments@JasperOceanTerminalEIS.com)**

**On-line**

**Public Comment Submission page at our website:  
[www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)**

**Comments should reference Public Notice Number SAC-2015-01238  
Please submit comments by March 1, 2017.**

**Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)**

# What is the NEPA Process?

## National Environmental Policy Act

The National Environmental Policy Act (NEPA) requires all federal agencies to evaluate major federal actions and inform decision makers and the public of the likely environmental consequences of proposed actions and alternatives.

## Environmental Impact Statement

A federal agency must prepare an Environmental Impact Statement (EIS) if it is proposing a major federal action that may significantly affect the quality of the human environment. An EIS is a detailed study that analyzes the potential effects, both positive and negative, that an action may have on the environment and local community.

## Scoping

Scoping is the earliest opportunity for the public to participate in the NEPA process. During the scoping process, public input is gathered to assist with the identification of issues and alternatives to be addressed in the EIS.

## NEPA Process



WE  
ARE  
HERE

## Public Scoping Meeting

The purposes of this Public Scoping Meeting are to:

- Provide the public with information about the EIS, the project, and how the public can participate in the NEPA process
- Gather public feedback, questions, and concerns about the proposed project and potential impacts to the human and natural environment
- Identify interested parties, stakeholders, and potential issues and/or alternatives that need to be evaluated in the EIS

Options to provide feedback:

- At today's Public Scoping Meeting
- Through email: [comments@JasperOceanTerminalEIS.com](mailto:comments@JasperOceanTerminalEIS.com)
- Through the Public Comment Submission page at [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)
- Through mail:

U.S. Army Corps of Engineers  
Charleston District  
c/o Nat Ball  
69-A Hagood Avenue  
Charleston, SC 29403

**Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)**



# The NEPA Team and Roles



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The U.S. Army Corps of Engineers (Corps) is preparing an Environmental Impact Statement (EIS) to assess the potential social, economic and environmental effects of the proposed construction and operation of the Jasper Ocean Terminal project.



U.S. Army Corps of Engineers  
(Lead Federal Agency)

The Charleston and Savannah Districts have authority to issue permits for activities impacting waters of the U.S. (e.g., wetlands). They will evaluate the impacts to waters of the U.S. in the EIS and make a decision whether to approve or deny the permit.

Atkins, Inc. is a neutral, third-party contractor who will prepare the EIS under the technical direction of the Corps.



Jasper Ocean Terminal  
Joint Venture

Jasper Ocean Terminal Joint Venture (JV), a partnership between the Georgia Ports Authority and the South Carolina Ports Authority, is the applicant who is seeking a permit from the Corps for potential impacts to waters of the U.S. Jasper Ocean Terminal JV is proposing to construct and operate a state-of-the-art marine container terminal.

**YOU**

The Public and  
Local Stakeholders

The public and local stakeholders are encouraged to participate in the NEPA process, particularly during scoping, review of the Draft EIS, at the Draft EIS public hearing, and review of the Final EIS.

**Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)**



# Proposed Project



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The proposed project consists of the construction and operation of a state-of-the-art marine container terminal in Jasper County, South Carolina by the Jasper Ocean Terminal (JOT) Joint Venture, a partnership between the Georgia Ports Authority and South Carolina Ports Authority. The proposed project includes an approximately 1,500-acre terminal site with road and rail improvements between the proposed terminal site and nearby transportation corridors (U.S. 17, CSX, and NS). The JOT would help meet the demand for containerized cargo within the region for the next 35 years.

## Proposed Railway Improvements

- A double track rail corridor to connect the JOT's intermodal rail yard to existing CSX Transportation and NS rail lines
- A new rail bridge across the Savannah River
- Multiple trestle bridges along waterways within the Savannah NWR

## Proposed Roadway Improvements

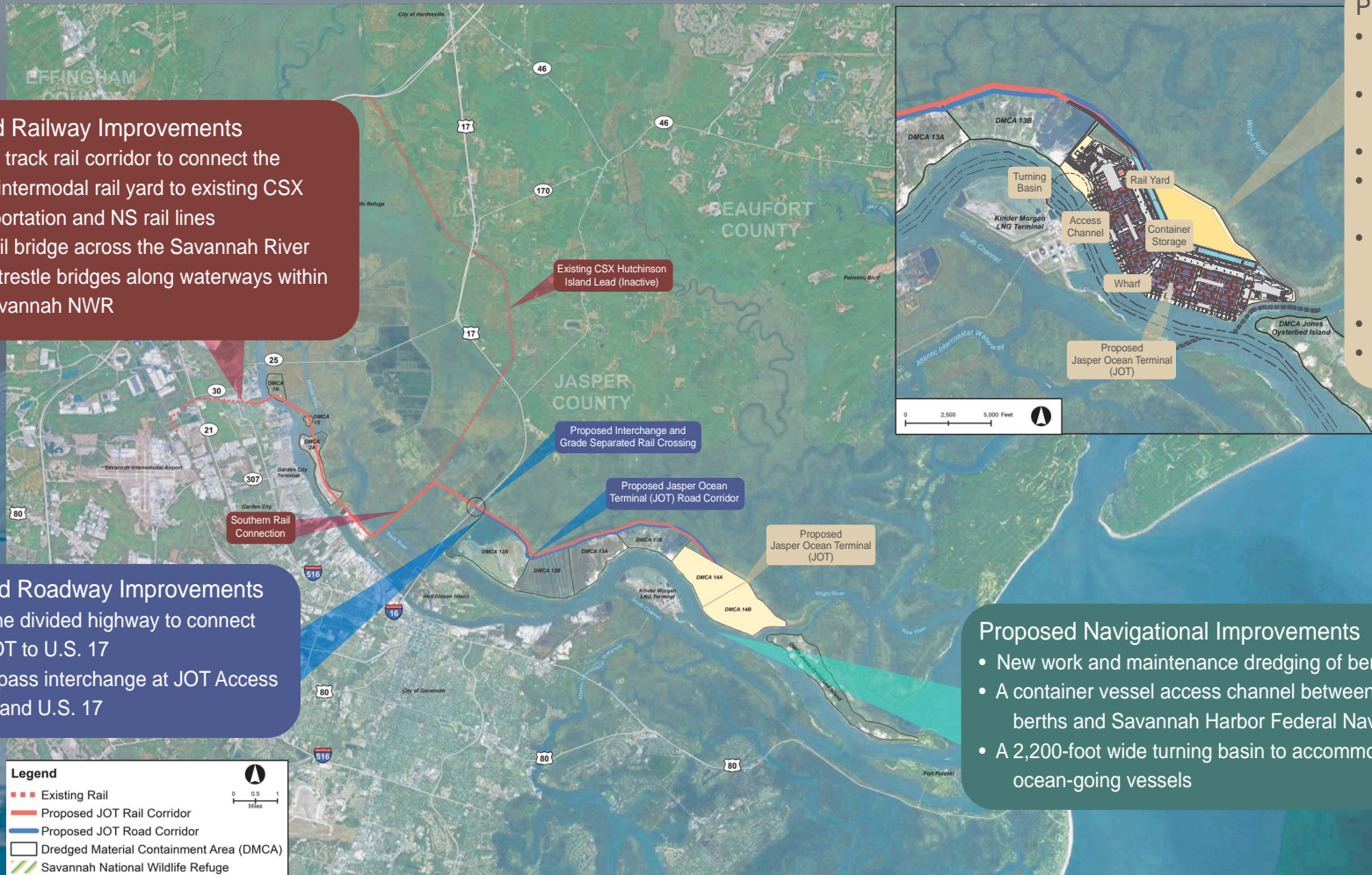
- Four-lane divided highway to connect the JOT to U.S. 17
- An overpass interchange at JOT Access Road and U.S. 17

## Proposed Navigational Improvements

- New work and maintenance dredging of berths
- A container vessel access channel between the proposed berths and Savannah Harbor Federal Navigation Channel
- A 2,200-foot wide turning basin to accommodate larger ocean-going vessels

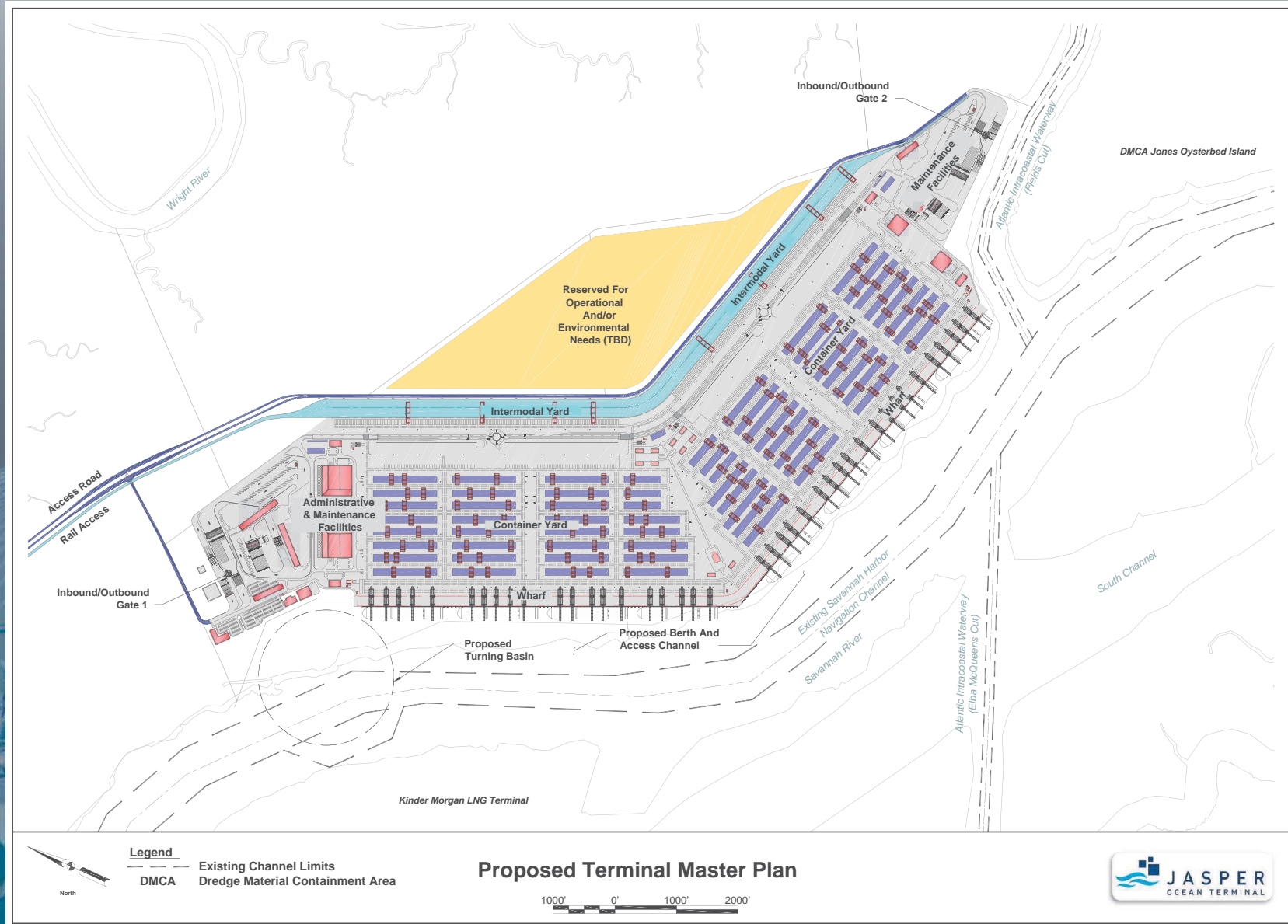
## Proposed Terminal Facilities

- 12,500-foot long pile-supported wharf
- Ship-to-shore cranes on the wharf
- Container storage yard
- An intermodal rail yard with wide-span gantry cranes
- Gate facilities to process entering and exiting truck traffic
- Administrative buildings
- Equipment service buildings



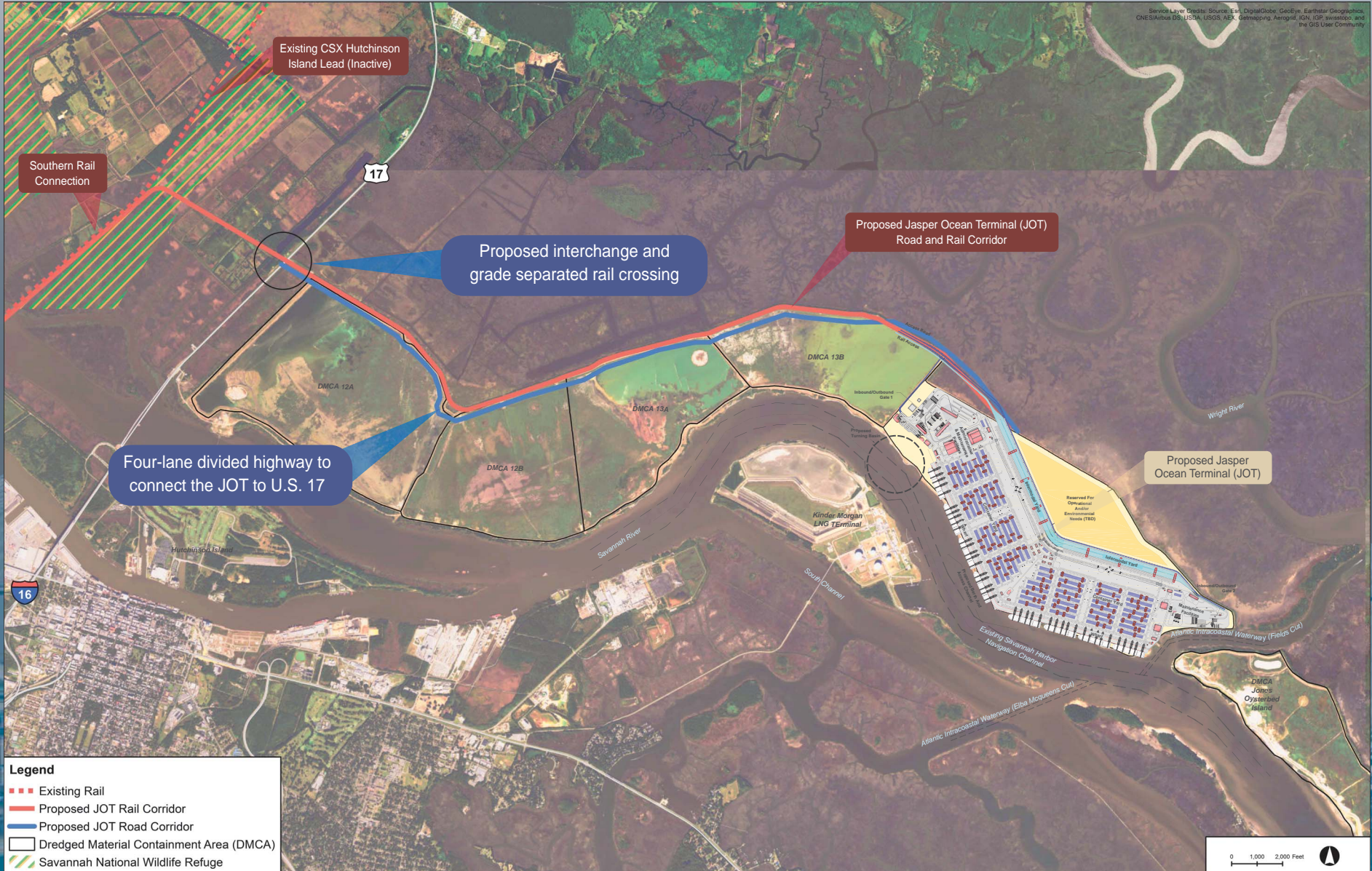
**Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)**

# Proposed Terminal Facilities



Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)

# Proposed Road Improvements



Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)

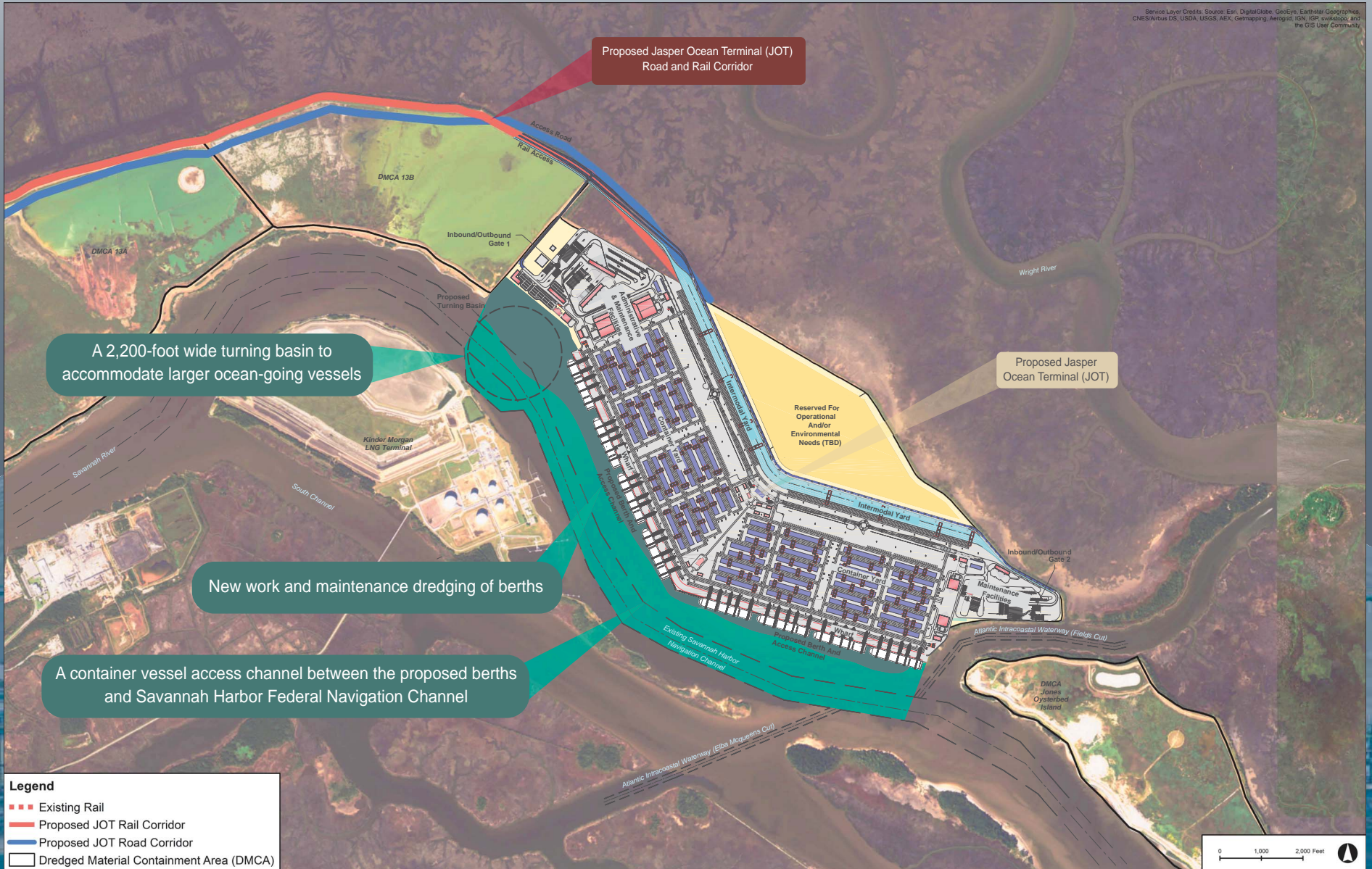
# Proposed Rail Improvements



Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)



# Proposed Navigational Improvements



Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)



# Purpose and Need



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The purpose and need for the project helps define the scope of the EIS and the alternatives that are considered in the EIS. The general purpose and need for the proposed project as stated by the Jasper Ocean Terminal Joint Venture include:

## Purpose

The purpose for the Jasper Ocean Terminal is to provide a bi-state owned and operated facility in Jasper County, South Carolina that can accommodate a minimum of 25-years of projected throughput growth for containerized cargo in support of economic development.

## Need

The forecast of cargo throughput over the next 35 years into the hinterland market region for both the Ports of Charleston and Savannah will result in the existing and planned marine container terminals in this region experiencing limitations and inefficiencies as early as 2025.



Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)



# Project Alternatives



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**The heart of the EIS is the alternatives analysis. Alternatives that will be addressed in the EIS include, but are not limited to:**

The Jasper Ocean Terminal (JOT) Joint Venture's (JV) proposed project.

Alternatives to the JOT JV's proposed project that would achieve the project purpose and may result in avoidance and/or minimization of impacts, such as alternative sites and/or alternative project configurations.

The No-Action Alternative describes future conditions without the proposed JOT project. The No-Action Alternative serves as the baseline for comparison when assessing the potential impacts of the other alternatives.



**Your involvement will assist us in making an informed decision. Thank you for your participation. For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)**

The following is a preliminary list of resources potentially impacted by the proposed project that will be evaluated in the EIS and may be expanded with input from you:

## Water Resources and Biological Environment

- Wetlands and waters of the U.S.
- Surface and groundwater
- Water quality
- Protected species
- Fish and wildlife habitat

## Human Environment

- Cultural resources
- Visual resources / aesthetics / lighting
- Socioeconomics and environmental justice
- Public health and safety
- Land use and zoning
- Transportation infrastructure
- Navigation channel

## Physical Environment

- Air quality and climate change
- Flood hazards and floodplain values
- Hazardous materials and solid waste
- Noise and vibration
- Geology and soils
- Sea level rise and shoreline erosion



Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)

# Cumulative Impacts

There are a number of other projects in the vicinity of the proposed JOT project at various stages of planning or completion. Some of these will be considered in the 'future without-project' scenario as a baseline condition for comparison (No-Action Alternative), others will be considered in the Cumulative Impacts section of this EIS.

- Project has been authorized and will be included in the analysis of future conditions with or without JOT scenarios.
- Proposed project that might be considered in the Cumulative Impacts section in the EIS.

Cumulative impacts result from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions.



Your involvement will assist us in making an informed decision. Thank you for your participation.  
 For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)



# How would Jasper Ocean Terminal affect the Savannah Harbor?



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## Savannah Harbor

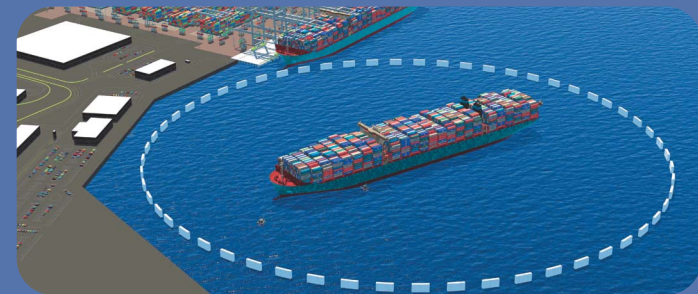
The Corps, Savannah District maintains the Savannah Harbor Navigation Channel (Federal project) for safe and efficient passage of harbor ship traffic.

- Savannah Harbor is an approximately 32.7 mile long Federal navigation project
- Current Federal project has an authorized project depth:
  - 42 feet Mean Lower Low Water (MLLW) in the inner harbor
  - 44 feet MLLW in the entrance channel
- The Savannah Harbor Expansion Project (SHEP) will deepen the inner Harbor to 47' MLLW and the entrance channel to 49' MLLW
- Current SHEP Actions include:
  - Deepening the entrance channel
  - Constructing the raw water storage impoundment and dissolved oxygen systems
  - Purchasing mitigation lands
  - Removal of the tide gate and excavation of the CSS Georgia

## Potential Impacts to Savannah Harbor

- Loss of sediment storage capacity
- Increase in shoaling
- Increase in cost of maintenance dredging
- Loss of wetland mitigation site
- Loss of wildlife habitat
- Need to expand Ocean Dredged Material Disposal Site

Potential impacts to Savannah Harbor will be evaluated by the Savannah District Planning Division and incorporated into the Draft EIS for the Jasper Ocean Terminal project.



**Your involvement will assist us in making an informed decision. Thank you for your participation.  
For more information, please visit the project website at: [www.JasperOceanTerminalEIS.com](http://www.JasperOceanTerminalEIS.com)**

## **Appendix E**

### **Transcript of Public Scoping Meeting**

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PUBLIC SCOPING MEETING  
FOR THE  
JASPER OCEAN TERMINAL PROJECT

Scoping meeting, reported by Julie L. Bonomo,  
Professional Court Reporter and Notary Public,  
Hardeeville Elementary School, 150 Hurricane Alley,  
Hardeeville, South Carolina, on Tuesday, January 31,  
2017, commencing at 7:00 p.m.



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Julie Bonomo, Court Reporter 843-609-9212

1 P-R-O-C-E-E-D-I-N-G-S

2 LT. COL. LUZZATTO: Ladies and Gentlemen, I  
3 have got 7 o'clock on my watch, so let's go ahead and  
4 get started. First, I want to say, great turnout. The  
5 purpose of the Corps of Engineers doing this is to get  
6 your feedback. All right? And if people don't come out  
7 to give us feedback, then we can't get the feedback.  
8 All right? So we have got lots of opportunities to  
9 provide that feedback here today, through the website  
10 that I'm going to mention, and also through written  
11 comments, if you want to.

12 Before we get started with the official  
13 portion of this, what I typically like to do is if we  
14 could all rise and say the Pledge of Allegiance, I'd  
15 appreciate it. Thank you.

16 (The Pledge of Allegiance was recited.)

17 LT. COL. LUZZATTO: Thank you very much.  
18 Good evening and welcome. I want to thank everyone for  
19 coming out and participating in this public scoping  
20 meeting. My name is Lieutenant Colonel Matt Luzzatto  
21 and I am the commander and district engineer for U.S  
22 Army Corps of Engineers Charleston District. The  
23 purpose of this meeting is to get your input about the

24 proposed Jasper Ocean Terminal.

25 For the record, the meeting started at

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4

1 7 p.m. on January 31, 2017 at the Hardeeville Elementary  
2 School in Hardeeville, South Carolina. As a courtesy to  
3 all, I kindly request that you please turn off all cell  
4 phones to avoid any disruptions. I would like to begin  
5 by introducing several members of the project team.

6 First, Mr. Travis Hughes, Chief of the Charleston  
7 District Regulatory Division. Where are you out there?

8 FROM THE FLOOR: Not in the building.

9 LT. COL. LUZZATTO: You'll meet Travis  
10 later. Mr. Nat Ball, Charleston District Regulatory  
11 Project Manager for the proposed Jasper Ocean Terminal.  
12 Ms. Sarah Wise, Savannah District Regulatory Project  
13 Manager for the proposed Jasper Ocean Terminal.

14 FROM THE FLOOR: She's right here.

15 MS. WISE: I'm right here.

16 LT. COL. LUZZATTO: Mr. Bill Bailey, Chief  
17 of the Savannah District Planning Division, over in the  
18 back. Ms. Sarah Corbett, with Charleston District  
19 Corporate Communications Office. And Mr. Russell Wicke,  
20 Chief Savannah District Corporate Communications Office.

21 MR. WICKE: Right here.

22 LT. COL. LUZZATTO: The format for tonight's

23 meeting will begin with an introduction, and then I will  
24 have Mr. Ball, the project manager, provide an overview  
25 of the Corps' regulatory authorities and the proposed

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5

1 Jasper Ocean Terminal.

2                   Following Mr. Ball, Mr. Dave Posek with the  
3 Joint Ocean Terminal Joint Venture or Joint Venture will  
4 say a few words about that their proposed project.  
5 Then, I will come back and provide you with some ground  
6 rules for the public participation for tonight's  
7 meeting.

8                   Some of you may be wondering why the U.S.  
9 Army Corps of Engineers is holding this meeting. In  
10 November 2015, the Joint Venture, a partnership between  
11 the Georgia Ports Authority and the South Carolina Ports  
12 Authority submitted a proposal to construct a  
13 state-of-the-art marine container terminal in Jasper  
14 County, South Carolina. The proposed Jasper Ocean  
15 Terminal or the JOT would accommodate approximately 7  
16 million, 20-foot equivalent units of containerized cargo  
17 per year.

18                   When added to the capacity of the existing  
19 facilities within the ports of Charleston and Savannah,  
20 and planned improvements to those port facilities, the  
21 proposed JOT would help the Joint Venture to meet the

22 demands for containerized cargo within the region for  
23 the next 35 years.

24                   Based on the available information,  
25 development of the proposed Jasper Ocean Terminal would

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6

1 result in the placement of fill material in  
2 approximately 54 acres of wetlands and other waters of  
3 the U.S., and dredging of approximately 439 acres of  
4 navigable waters of the U.S.

5                   Therefore, one or more Department of the  
6 Army permits pursuant to Section 404 of the Clean Water  
7 Act and Section 10 of the Rivers and Harbors Act are  
8 required.

9                   Since the Jasper Ocean Terminal and the  
10 majority of the proposed road and rail improvements are  
11 located within the State of South Carolina, the  
12 Charleston District Regulatory Division will be  
13 responsible for reviewing these portions of the proposed  
14 work.

15                   Likewise, the Savannah District Regulatory  
16 Division will be responsible for reviewing the proposed  
17 rail improvements that cross the Savannah River and  
18 connect to the existing rail lines within the State of  
19 Georgia. As evidenced by the presence of staff from  
20 both Corps of Engineers districts at tonight's meeting,

21 we are working together to ensure that our evaluation  
22 fully addresses all of the components of the Jasper  
23 Ocean Terminal.

24 In accordance with the Rivers and Harbors  
25 Act and the Clean Water Act, potential benefits of the

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1 proposed project must be carefully weighed against the  
2 potential impact of the proposed project and the final  
3 decision whether to issue a Department of the Army  
4 permit will be determined by the outcome of this  
5 balancing process.

6 In addition to the Corps' regulations, all  
7 federal agencies must comply with the National  
8 Environmental Policy Act or NEPA. The Corps is  
9 preparing an Environmental Impact Statement or EIS to  
10 document the NEPA process and the potential impacts of  
11 the proposed Jasper Ocean Terminal on the environment.

12 A third-party contractor, Atkins  
13 Incorporated, will assist the Corps during the  
14 preparation of the EIS. Although Atkins Incorporated is  
15 paid for by the Joint Venture, the Corps is responsible  
16 for the content of the EIS and the Corps will direct  
17 Atkins during the preparation of the study and the  
18 analyses that will be used to evaluate the proposed  
19 Jasper Ocean Terminal.

20                   Please keep in mind, the Corps is not  
21 proposing to construct or operate any portion of the  
22 Jasper Ocean Terminal. We are a federal permitting  
23 agency. We are neither for or against the proposed  
24 project. We are neutral administrators of the law. We  
25 are tasked with evaluating the proposed project and

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8

1 making a decision whether or not to authorize impacts to  
2 waters of the United States.

3                   Your input tonight and throughout the NEPA  
4 process is essential to ensure that the EIS addresses  
5 potential direct, indirect and cumulative effects of the  
6 proposed Jasper Ocean Terminal, and our decision  
7 regarding the proposed project is fair and balanced.

8                   As the district engineer, I'm ultimately  
9 responsible for making the decision. I would like to  
10 hear your perspective about the Jasper Ocean Terminal.  
11 This is not a question and answer session. Because we  
12 are too early in the process, I honestly don't have the  
13 answers to all of your questions at this point.

14                   Tonight's meeting is an opportunity for you  
15 to let me know if there are any specific issues or  
16 concerns that you believe should be included in EIS or  
17 considered during our evaluation of this proposed  
18 project. And since it is your opportunity to provide

19 comments to the Corps of Engineers, you should address  
20 your comments to me and not to the audience.

21 We have a court reporter here this evening  
22 to help ensure that we document your comments.

23 Tonight's scoping meeting is the first opportunity that  
24 you will have to provide input about the proposed Jasper  
25 Ocean Terminal. Over the next couple of years, the

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9

1 Corps will hold additional informational workshops and  
2 public meetings. I would like to encourage you to take  
3 advantage of these opportunities to participate in the  
4 NEPA process.

5 Information about the Jasper Ocean Terminal  
6 is also available on the project website  
7 [www.JasperOceanTerminalEIS](http://www.JasperOceanTerminalEIS.com), all one word, dot com. In  
8 addition to obtaining information about the Jasper Ocean  
9 Terminal, you can also sign up for the project mailing  
10 list and submit written comments on the website.

11 In addition, you should have received a  
12 registration card. If you have not done so already,  
13 please complete the card and return it to my staff at  
14 the registration desk. The information on these cards  
15 will be used to document that you have attended this  
16 meeting and to ensure that you are notified about future  
17 public meetings.



18                   These cards will also be used to call on  
19 individuals that would like to make a statement this  
20 evening. If anyone did not receive a card or did not  
21 turn their card in and would like to speak at tonight's  
22 meeting, please raise your hand and I'll have a member  
23 of my staff bring you one.

24                   All right. This evening's meeting is an  
25 opportunity for the public to participate in the

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10

1 development of the environmental impact statement. We  
2 need your help to identify the issues and alternatives  
3 that need to be considered for the EIS.

4                   I would like to now have Mr. Nat Ball, the  
5 Charleston District Regulatory Project Manager, provide  
6 you with a brief overview of the process that we will be  
7 following during this evaluation of the proposed  
8 project. Mr. Ball?

9                   MR. BALL: It's a little crowded up here.  
10 Thank you, Colonel Luzzatto. I would like to echo what  
11 the colonel said that, you know, we're really glad to  
12 see a crowd tonight. I have been to public meetings  
13 where, you know, you went to a lot of trouble, you put  
14 together posters, and I think the worst turnout we ever  
15 had was three people. We all sat down in the front row,  
16 we sat down and had a great discussion.

17                   But on a project of this size and scale,  
18   it's important that not only folks on the South Carolina  
19   side but also the folks on the Georgia side are here,  
20   too. Because this is a massive project, it is an  
21   important project, and as Colonel Luzzatto said, we  
22   really are at the beginning of this process. And we're  
23   glad to have you here and we want you here throughout  
24   the process as we begin to prepare analyses and have  
25   more information for you to review.

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11

1                   So that being said, this project and I think  
2   in the discussions we have had in the room next door, I  
3   think most of you were able to get here for the open  
4   house. To put a scale on it, today, the Garden City  
5   Terminal handles somewhere in the neighborhood of about  
6   3.5 million 20-foot equivalent units TEUs. This is a  
7   1,500 acre site, and it would be designed to handle  
8   7 million TEUs, so roughly twice what is coming through  
9   Savannah today.

10                  So as far as the importance of this project  
11   and the importance of this study, you know, we want to  
12   make sure that we get it right. For those of you who  
13   aren't familiar necessarily with where the site is  
14   located, this is Highway 17, The Talmadge Bridge. If  
15   you're driving down 17, you can probably -- or I know I

16 can see the Southern LNG facility, you can see the tanks  
17 they have out there. This is immediately across the  
18 river.

19 And so, when we look at this project, this  
20 terminal would be constructed immediately adjacent to  
21 the Savannah Harbor Navigation Channel. So to that end,  
22 Savannah District is deepening Savannah Harbor. It's  
23 authorized to go to a depth of minus 47 feet Mean Lower  
24 Low Water. This facility would be constructed adjacent  
25 to that existing channel, and ships would be able to

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12

1 come up the channel and access this facility. I'm going  
2 jump around if this thing lets me get there.

3 LT. COL. LUZZATTO: That's about as far as  
4 you can go.

5 MR. BALL: That's about as far as I can go.  
6 I'll speak up. So this green here is highlighting  
7 improvements to the navigation -- navigation  
8 improvements associated with this project. In essence,  
9 they will be looking at deepening 1,000 feet. So from  
10 the edge of the channel going 1,000 feet off to build  
11 wharfs and the berths, and those wharfs and berths, you  
12 know, that would be where they would unload the ships.  
13 They're also proposing to build a 2,200 foot diameter  
14 turning basin to turn this future generation of ships.

15                   So as I said, new terminal adjacent to the  
16 existing harbor and what we're talking about is the  
17 future. So this is the deepened harbor. This is shown  
18 as constructed in the future.

19                   Another aspect of this project, where you  
20 have got a marine container terminal, you're going to  
21 have roads and rails that need to get in and out of this  
22 facility. Jumping back to the other side. And actually  
23 those of you, when you came in, if you got this little  
24 tri-fold handout, if you haven't opened it up yet, there  
25 is actually a map in the middle that shows the proposed

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13

1 project and highlights these different features. But  
2 you would have road and rail corridors. The road  
3 corridor, in essence, a four-lane dedicated access road  
4 to take trucks in and out of the terminal to tie into  
5 Highway 17.

6                   You would also have a dual rail corridor  
7 extending and tying into an inactive CSX rail line, but,  
8 in essence, trying to tie into a rail corridor in order  
9 to get trains in and out of this facility.

10                   And I think they gave me another map back  
11 here, if I don't knock it over.

12                   FROM THE FLOOR: Can you not move the stand  
13 closer to you?

14 MR. BALL: To be honest, for purposes of  
15 what we're talking about, I think y'all have a map and  
16 y'all can hopefully look at that map and see.

17 FROM THE FLOOR: Thank you.

18 MR. BALL: If you can't see it here.

19 FROM THE FLOOR: I can't hear you, though.

20 MR. BALL: Is that better?

21 FROM THE FLOOR: Yes.

22 MR. BALL: Okay. Yeah. I was going to lose  
23 my voice.

24 FROM THE FLOOR: Exactly.

25 MR. BALL: So the blue being the road

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14

1 corridor tying into 17, the red being the rail corridor  
2 tying into this dotted line which is an inactive CSX  
3 line. That would then lead out to CSX's main line out  
4 behind 95. This solid line being a new rail line that  
5 would parallel the edge of the river. That would  
6 actually -- that would be a new bridge that crosses the  
7 Savannah River.

8 For those of you that are familiar with this  
9 area, this is Alligator Alley. You know, there is the  
10 swing bridge today that crosses the river, this would be  
11 just downstream from that. It would tie into existing  
12 rail lines over by the Garden City Terminal as far as

13 getting out to the main line.

14                   So these are the basic components of this  
15 project. We'll be preparing the EIS to look at all of  
16 those components. And as Colonel Luzzatto mentioned,  
17 the Corps of Engineers, why are we involved? He  
18 mentioned Section 10 of the Rivers and Harbors Act and  
19 he mentioned Section 404 of the Clean Waters Act. When  
20 you look at dredging in front of the terminal, so  
21 dredging in this area, the turning basin, that goes  
22 under Section 10 of the Rivers and Harbors Act. Those  
23 are things that the Corps will review, the proposal from  
24 the Joint Venture, in order get a permit decision about  
25 that dredging component of the project.

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1                   We'll also review the road and rail  
2 corridors. In order to build these, you know, some of  
3 them may be pile supported, some of them may be on  
4 grades, may be fill, or may be on a causeway. That  
5 would be fill in waters of the United States, that also  
6 requires a permit from the Corps of Engineers.

7                   So that's why we're here today preparing an  
8 environmental impact statement to gather the information  
9 necessary to make those permit decisions. We will do  
10 a -- in accordance with the National Environmental  
11 Policy Act, we will do a full public interest review.

12 We will look at all the different factors. We'll look  
13 at roads, we'll look at rails, we'll look at noise,  
14 we'll look at light. That's part of why we want you  
15 here.

16 To be honest, I'm from Charleston, we have  
17 got some folks from Savannah that certainly are more  
18 familiar with y'all's area, but y'all are the residents  
19 of this area. Y'all are the ones who know more than we  
20 do about this area. Y'all are the ones that will help  
21 us identify what those potential effects are. So that  
22 when we begin preparing analyses, we're looking at the  
23 right issues we know what the right problems are. Or I  
24 shouldn't say right problems, we know what the problems  
25 are. We know to do the analysis and if they highlight

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1 issues that need to be addressed, well, that is the goal  
2 of this entire process is to get that information in  
3 your hands so that when you're considering this project  
4 and provide input on this project, you have the  
5 information you need to provide good feedback and we  
6 have the information we need to conduct the public  
7 interest review that would ultimately support a permit  
8 decision.

9 Now another aspect of this, I'm with the  
10 Charleston District. We have the Savannah District here

11 as well. Colonel Luzzatto mentioned that actually where  
12 this rail bridge crosses potentially you've got impacts  
13 and fill associated with waters of the U.S. that would  
14 require permits not only from Charleston, but a permit  
15 from Savannah District.

16 We have got the navigation improvements  
17 which I pointed out down here. In order to build this  
18 facility, they have got to dredge. Well, you know,  
19 dredge does not necessarily recognize state lines. You  
20 have got portions to be dredged on the South Carolina  
21 side, portions dredged on the Savannah side. You know,  
22 the intent here is to have one document that considers  
23 all of these issues, provides all of information we need  
24 to make both of those decisions, the regulatory with  
25 Charleston, as well as regulatory with Savannah.

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1 One more component of this project is  
2 Savannah Harbor. That's an existing Federal navigation  
3 channel. Certainly the Savannah District is part of  
4 this analysis. They will also look at what is the  
5 potential effect on Savannah Harbor. The site where  
6 they're actually proposing to build the terminal, it's a  
7 dredge material containment area. It's an area that  
8 they use to manage the materials to maintain Savannah  
9 Harbor. So certainly within the Corps, it's not just



10 regulatory, it's also planning. Planning will be taking  
11 a hard look. We'll do a detailed analysis to find out  
12 what the potential effects on the harbor are.

13               So as I say, there's a lot of different  
14 components to this project. I'm really glad that we  
15 have the turnout that we do. We are at the beginning of  
16 this process. The goal is to get your feedback, as I  
17 said. Once we start preparing the analyses, once we  
18 have the document that we can come back and provide  
19 additional information to you, we certainly will, and  
20 you'll have an opportunity to comment at that point.

21               We don't expect you to understand the  
22 nuances of the Corps' regulations. We don't necessarily  
23 expect you to understand the details of some of these  
24 analyses, but what we want to do is we want to get it  
25 into a format. We want to provide that information to

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1 you, as I said, so you can provide well-informed  
2 comments and we can provide well-informed decisions.

3               So, with that being said, I think Colonel  
4 Luzzatto has said it, it's also in these handouts. We  
5 have the meeting tonight. We're going to be meeting  
6 with federal and state agencies, both from South  
7 Carolina and Georgia, to get their feedback on this  
8 project as well.

9                   And ultimately -- in the meantime, this  
10 website address, it's in this handout, there is also a  
11 mechanism on that website where you can provide  
12 comments. If you're not comfortable doing that on the  
13 internet and on the computer, you certainly can call me.  
14 You certainly can submit your comments handwritten,  
15 that's perfectly fine. But we really appreciate y'all  
16 being here today and look forward to working with you in  
17 the coming years looking at this project. Thank you.

18                   (Applause.)

19                   LT. COL. LUZZATTO: All right. At this  
20 time, I would like to allow Mr. Dave Posek from the  
21 Joint Venture to say a few words about the proposed  
22 project. We believe it is important for the Joint  
23 Venture to provide their perspective.

24                   Please understand, Mr. Posek's comments  
25 represent the views of the Joint Venture and do not

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1 necessarily reflect the views of the Corps of Engineers.  
2 Mr. Posek.

3                   (Applause.)

4                   MR. POSEK: It is wonderful to see everyone  
5 tonight. I'm trying to think back. It was -- I think  
6 it was 2009 when two governors signed the agreement  
7 between Georgia and South Carolina to begin this

8 process, and here we are.

9                   For those who don't know me, I'm David  
10 Posek. I'm a long-term member of the South Carolina  
11 State Ports Authority Board and currently the chairman  
12 of what we call the Joint Project Office of the Jasper  
13 Ocean Terminal. The JPO is the chief governing body  
14 overseeing the development of the Jasper Ocean Terminal.  
15 It is the outgrowth of the Joint Venture agreement  
16 signed late in 2015 by the ports of South Carolina and  
17 Georgia, and it's a 50-50 joint venture.

18                   The JPO is actually composed of six  
19 independent members, three from each state. And from  
20 each state, one members is appointed by the governor,  
21 one by the Ports Authority itself, and then the chairman  
22 of each Ports Authority is a member. On the Georgia  
23 side, William McKnight, Joel Wooten and Jimmy Allgood  
24 are members. On the South Carolina side, Colden Battey,  
25 myself, and Patrick McKinney are.

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1                   Colden, why don't you stand? I see Colden,  
2 put your hand up. Many of you know Colden. We also  
3 retain an executive advisor to the board, and Doug  
4 Marchand who is with us tonight, he is that person. We  
5 report to the two boards and we meet officially twice a  
6 year and informally as needed, usually probably about

7 four or five times a year.

8 The Jasper Ocean Terminal reflects and is  
9 the natural extension and only option of the successful  
10 growth of both ports. I say only option. There is no  
11 other place to expand once capacity is reached. There  
12 is no viable option for growth for either state.

13 The current overall stated capacity of both  
14 ports is currently 11 million TEUs. The last year's  
15 numbers of volume for both ports combined were 5.6  
16 million TEUs. So you see we have some time before  
17 either port reaches capacity, but we need to continue  
18 our planning and development to meet the future demand.

19 To that end, we have continued to provide  
20 yearly funding from both authorities. In fiscal year  
21 '17, this year's budget includes about six and a half  
22 million dollars from both states after -- from each.  
23 And South Carolina has actually begun to set aside  
24 funding for highway construction in the governor's  
25 budget. It has to go through the General Assembly, but

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1 there is 20 million dollars in this year beginning that  
2 process. So that will continue now going forward.

3 The JPO will have a major impact on both  
4 states. Both ports are the economic engines of their  
5 respective states and the Jasper Port will greatly

6 enhance the job growth and revenue within both states.  
7 We did a study some time ago and it said that each port  
8 together represents billions of dollars of revenue and  
9 almost a million jobs from both states. So this will  
10 add to that in a very big way.

11 The Jasper Port is in an ideal location on  
12 the East Coast to accommodate the volume industry  
13 demands for larger ships has increased volume from the  
14 Southeast United States. This port, Jasper, will be the  
15 only port of three on the East Coast to accommodate the  
16 largest container vessels. We're talking the 22,000 TEU  
17 container vessels that are actually being bought now by  
18 the main folks.

19 We want the Jasper Port to have a very  
20 positive impact on the local community here, and to that  
21 end, as Nat and the Colonel said, it is important. We  
22 can't have a success without your involvement and  
23 support. So with that, I'll turn it back over to the  
24 Colonel, but thank you very much for coming, and this is  
25 the beginning of a great project.

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1 (Applause.)

2 LT. COL. LUZZATTO: Thank you, Mr. Posek.  
3 All right. Before we begin the public participation  
4 portion of tonight's meeting, I would like to go over a

5 few ground rules. As I call your name, please come down  
6 to the microphone right up here in the front. Each  
7 speaker will be given three minutes to make comments,  
8 and you cannot defer your time to another individual.

9           When a speaker has one minute remaining, our  
10 timekeeper, down here in the front, will raise the  
11 yellow sign that indicates that there is one minute  
12 remaining. When the speaker's time has ended, our  
13 timekeeper will raise the red sign that indicates that  
14 time has expired.

15           In order to be fair to everyone, I ask that  
16 you please limit your comments to the allotted time. If  
17 your time expires before you have completed your  
18 comments, I will be very happy to accept any written  
19 information or notes that you may have brought with you  
20 tonight.

21           I would advise the speakers that if a  
22 previous speaker makes a statement very similar to the  
23 statement you plan to make, and you believe this issue  
24 has been properly communicated, you might want to  
25 consider focusing on a different issue.

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1           The last ground rule is that everyone should  
2 be respectful and courteous towards each speaker. Thank  
3 you for your patience. If everyone is ready, let's get

4 started. And before we do, I do want to take a moment  
5 to recognize some public officials that are in the  
6 audience. Some have asked to speak, but I just want to  
7 recognize everyone who is here. First, from the  
8 Beaufort County Council, we have Mr. Michael Covert.  
9 From the Jasper County Council, we have Martin Sauls,  
10 Barbara Clark, Henry Etheridge, and Tom Johnson. From  
11 the Jasper County School Board, we have Debora Butler,  
12 Pricilla Green, and Kevin Karg. From the Gullah-Geechee  
13 Nation, we have Queen Quet. And from the Hilton Head  
14 Town Council, we have David Ames.

15 With that, as I call you down and you take  
16 the mike, if you could for the stenographer, spell your  
17 name. That will help her keep good track. We just went  
18 in the order that you arrived and signed up to speak.  
19 And with that, the first person who requested to speak  
20 was Stan Lancaster.

21 Again, sir, if you could face me. You're  
22 addressing comments to me, so stand on the other side of  
23 the podium.

24 MR. LANCASTER: Oh, to you?

25 LT. COL. LUZZATTO: Yes. You're giving me

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1 your input.

2 MR. LANCASTER: Sure. Thank you. Yeah.

3 I'm Stan Lancaster. I'm a local resident, been here  
4 about 40 years, and I travel between Savannah and Jasper  
5 County. Basically, my -- if my house was a little  
6 taller, I could see this port that is going in. So as  
7 the crow flies, maybe 5 miles. Looking forward to it,  
8 but I want to make sure that the audience knows that not  
9 only we need the port, but we need the roads.

10 Right now it's terrible, and I don't know if  
11 you guys get into that, you probably don't, but I really  
12 need everyone here to think about talking to the people  
13 from the South Carolina DOT, which I have started. And  
14 everyone knows the problem, but it looks like the  
15 politicians don't want to take a look at it. The  
16 gentleman earlier said there is money supposedly coming,  
17 but we need to make sure that our life doesn't change  
18 completely and we can't get out of our driveway. It's  
19 that bad already.

20 So, you know, the traffic basically I would  
21 guess from Jasper side, most of it would be headed  
22 towards Hardeeville goes north, and that road is  
23 terrible. I don't see unless there is -- I think there  
24 is something about an interchange. I know this is not  
25 your bale to work with, but I think everyone here needs

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1 to know that DOT -- South Carolina DOT does have



2 meetings in this county, and I would like to see this  
3 meeting show up at that meeting.

4                   So if we can always find out and let  
5 everyone know because most of the traffic is not Jasper  
6 County going to Savannah, it's Beaufort County. Because  
7 the residence of Jasper is not that large, so we need to  
8 make sure Beaufort County shows up, too, to try to help  
9 us do something about the infrastructure for the roads.

10                   The port is great, but if you can't get it  
11 out and it ties up traffic, it -- Savannah has the worst  
12 problem there is, so we need to make sure that it  
13 doesn't happen to us also. Thank you.

14                   LT. COL. LUZZATTO: Thank you. Next,  
15 William Young.

16                   MR. YOUNG: As some of 25 years -- 28-year  
17 veteran of the Corps of Engineers, I worked in Savannah  
18 District from 1963 to '90, I was personally in charge of  
19 all of the dredging, dike construction, for the whole  
20 district. That's just for Savannah. But when I started  
21 here, the front dikes were the only dikes along the  
22 river. Everything was just up over and was let run into  
23 -- back into the Wright River which came back around  
24 into the harbor. Since then, the dikes have gone from  
25 10 feet up to 60, 70 feet.

1 I know where the material was obtained from  
2 for the dikes and I know what the layout of the channels  
3 because I worked with the piles on that when we first  
4 started the first deepening in 1967.

5 Anyway, I just want to offer my knowledge to  
6 whoever I can on this because there aren't too many of  
7 us old fellows around that have been here that long.  
8 Thank you.

9 In regards to the first gentleman, the road  
10 construction for Highway 17 is to start next year on the  
11 four-lane. And they're starting now with removing the  
12 line up on Highway 17. Thank you.

13 LT. COL. LUZZATTO: All right. Thank you.  
14 Paul Peebles?

15 FROM THE FLOOR: He is not here.

16 LT. COL. LUZZATTO: Paul is not here. All  
17 right. Moving on. Jacob Oblander.

18 MR. OBLANDER: Hi. I'm Jake Oblander, the  
19 outreach coordinator with Savannah Riverkeeper, as well  
20 as a resident of Hardeeville right on the Savannah, a  
21 little bit up the river from I-95. I have some comments  
22 from Savannah Riverkeeper today to read.

23 So the cohesive effects of Elba Island and  
24 Jasper are not being considered together adequately, we  
25 feel. They're being sort of moved forward in a vacuum.

1 I'm worried about the fact that a permit has already  
2 been issued without there being much consideration of  
3 the Jasper Ocean Terminal Project, and the effect that  
4 something along the lines of 250 million cubic feet of  
5 natural gas a day will be leaving from the facility.  
6 And that while natural gas ships are at berth, it will  
7 shut down the whole harbor. We're looking to see what  
8 kind of effect that's going to have on the commercial  
9 traffic already existing and new traffic with  
10 construction and what is going to come in and out of the  
11 port there.

12 In looking at the Savannah Harbor deepening  
13 shows, we are strongly opposed to additional dredging  
14 and we just want to make sure that the dredging being  
15 done is being done correctly to mitigate all issues with  
16 those materials pulled out, and we're hoping that an  
17 additional EIS will be done for that dredging project  
18 separately.

19 The project also seems to have a high number  
20 of stream and marsh crossings between the roads and rail  
21 lines, and we are really hoping for the least impactful  
22 option of infrastructure possible with an emphasis on  
23 maintaining the flow and function of these marshes being  
24 impacted. Our marshland is already decreasing a lot in  
25 these areas due to development.

1           We want a full analysis of the change in the  
2 flow expected from the Jasper Ocean Terminal and the  
3 adjoining river, including the effect on the adjacent  
4 marshland, river, bogs and habitats. We're also hoping  
5 for a complete study of the storage and flow changes  
6 expected from the vast amount of storm water runoff this  
7 site is going to create.

8           Traffic to and from the site is a huge  
9 concern, as has already been echoed. Construction,  
10 rail, and truck traffic will create a large amount of  
11 congestion in this area and we're just hoping to see  
12 what improvements we need for not only the Highway 17,  
13 but for the Talmadge Bridge or Back River Bridge going  
14 over towards Georgia, as well as an accompanying air  
15 quality, vibration, and light issues are mitigated.

16           A complete and thorough analysis of the  
17 dredging material in which the terminal is being built  
18 on and the potential for contaminants leaking out into  
19 -- leaking out into the waterways, to make sure that is  
20 prevented.

21           We would also like a thorough archaeological  
22 study performed on the site and an active conversation  
23 with the Yemassee and Gullah-Geechee communities to stay  
24 informed in this process and ensure their interests are

25 protected.

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1                   And finally, the issue of light pollution.  
2 For those folks living on Richardson Creek in Savannah  
3 and the surrounding areas should be considered, as well  
4 as potential effects on nesting and hatchling sea  
5 turtles on the nearby islands. Thank you.

6                   LT. COL. LUZZATTO: Randy Tate.

7                   FROM THE FLOOR: Randy has gone, too.

8                   LT. COL. LUZZATTO: Randy has gone, too.  
9 Martin Sauls.

10                   MR. SAULS: He is here. Lieutenant Colonel,  
11 I'm Martin Sauls. I have the pleasure of serving as  
12 chairman of Jasper County Council, and I would like to  
13 thank you for being here tonight and the team that you  
14 have assembled of experts who will participate in what's  
15 probably the most important project, not only to our  
16 county but the entire East Coast. So we want to thank  
17 you for publicizing this meeting, putting this program  
18 together to allow our community and our neighbors to  
19 come here to learn more about the project and the  
20 ramifications it will have both on the environment,  
21 economic impact, transportation, and several other  
22 issues.

23                   I would like to emphasize that in 2011, I

24 believe, the Savannah District of the U.S. Army Corps of  
25 Engineers completed an EIS study which I serve on the

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1 Savannah River Maritime Commission and we had some  
2 conversation about that. But I want to emphasize the  
3 importance of including a very thorough economic study  
4 on what this is really going to do for Jasper County,  
5 for the Lowcountry, for our state, and for the entire  
6 East Coast. That is very important to us. So I want to  
7 make sure that y'all put a special emphasis on that as  
8 well as our environment. There is a lot of impact that  
9 will take place and it's very near and dear to our  
10 hearts.

11 A lot of us, like myself, were born and  
12 raised here, families have been here for generations.  
13 So we want to make sure that everything is done very  
14 thorough and we certainly know that that is the intent  
15 of the Army Corps of Engineers and your team. At the  
16 same time, we're very excited about this being performed  
17 in an expeditious manner because we're all excited to  
18 see this.

19 There's people here that have worked on this  
20 process like Councilman Tom Johnson for nearly a quarter  
21 of a century. I know that he has got a lot of time and  
22 effort into this process and several other people do, as

23 well. But we appreciate what you're doing, the way  
24 you're handling it going forward. We appreciate the  
25 open line of communication and we look forward to some

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1 more events like this and keep the public informed of  
2 where this project is and the completion of it. So,  
3 thank you very much, Lieutenant Colonel.

4 LT. COL. LUZZATTO: Thank you. Colden  
5 Battey?

6 MR. BATTEY: Colonel, I'm Colden Battey, and  
7 I'm a member of the Joint Project Office along with Dave  
8 Posek and the others. As you know, this project  
9 commenced because the ports of Savannah and Charleston  
10 would be full at a certain period of time. During the  
11 time this project has progressed, there is another thing  
12 that has occurred that I think is even as important as  
13 that or perhaps more.

14 In about 2015, the lines started going to  
15 bigger and bigger and bigger vessels. I happened to  
16 look today and in 2015 there were 102 ships that were  
17 over 14,000 TEU. Since then, Maersk has contracted 11  
18 20,000 TEUs. The Alliance of OOCL and MOL has  
19 contracted 12, and one of them has 3. These ships  
20 deliver 28 feet. I may have missed some, but those I  
21 could get on the internet. That would be about 130

22 ships larger than the 14,000 TEU ceiling in 2018.

23                   There are no ports on the Eastern Seaboard  
24 now that can receive these large ships. Nobody. Not  
25 New York, not Norfolk, nor Charleston, Savannah.

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1 Savannah, even with it's deepening, I think would cover  
2 that limit to 10,000 TEU.

3                   Charleston would be limited to 14,000 TEUs.  
4 This site, because it doesn't have any bridges, would  
5 not be limited, and could take the 20,000 TEU vessels,  
6 and it would be the only port on the Eastern Seaboard  
7 that could handle these vessels. I think there is one  
8 other thing, I mentioned this because I think it's  
9 important to realize that these vessels can't travel  
10 through either Charleston or Savannah because they're  
11 limited by the height of the bridges. They can't get  
12 under the bridges. This, of course, would not be a  
13 problem here in Jasper County.

14                   So I think that this involves -- it may be  
15 some delay until the others are filled in Charleston and  
16 Savannah. I think this is important enough right now.  
17 This port could be the only port on the Eastern Seaboard  
18 that could receive these large vessels. Right now the  
19 service going through from -- from the Far East going  
20 through. When the 20,000 TEU vessels come, they go



21 through Suez because they can't get through the Panama  
22 Canal. They have to go around the Cape. If they go  
23 through Suez and serve Lauderdale which I think is  
24 probably the port here that could handle such, they  
25 could just as easily come through the Suez or come to

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1 the Eastern Seaboard and come to Jasper County.

2 As I said, Jasper County would be the only  
3 one, perhaps New York has a problem with the bridge, if  
4 they have got that solved they would have to blast a  
5 little. It's big because of the thing.

6 So this is an opportunity, I hope to Corps  
7 will look at this because I think that this in and of  
8 itself is the reason that this port should be built --  
9 should be permitted and then built, and I think it  
10 should as soon as possible because I think it is needed  
11 at the present time. Thank you.

12 LT. COL. LUZZATTO: Thank you.

13 (Applause.)

14 LT. COL. LUZZATTO: Tom James.

15 MR. JAMES: Good evening. I'm Tom James.

16 I'm a freight car owner in Savannah and Charleston, so I  
17 am critically aware of the needs we have. I also agree  
18 with the gentleman. We need to put a time clock on  
19 this. It took us 14 years to decide we want to dredge

20 the Savannah River to make it deep enough for these  
21 ships. Hopefully, it doesn't take it more than 4 or 5  
22 years to complete this project. But we study, we study,  
23 we study. Two thoughts. First, the time clock on what  
24 you folks are doing.

25 Secondly, and this is just a comment. The

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1 flags are incorrectly placed on the stage. The American  
2 flag should be stage right and I can't believe the Corps  
3 of Engineers did not handle that. I certainly hope the  
4 project is handled in a much better fashion. Thank you.

5 (Applause.)

6 LT. COL. LUZZATTO: Fair enough. Queen  
7 Quet.

8 MS. QUET: Good evening. I'm Queen Quet,  
9 chieftain of the state of the Gullah-Geechee Nation, as  
10 we would say, wi gladdee to be here with hunnuh chillun  
11 this evening. I am very pleased that the Army Corps of  
12 Engineers is having this hearing so that you can hear  
13 from us. And I want to thank, in particular, Savannah  
14 Riverkeepers, because they were the ones that made the  
15 Gullah-Geechee Nation aware that this meeting would  
16 happen.

17 In our culture, and our cultural heritage is  
18 throughout not only the area of this project, but from

19 Jacksonville, North Carolina to Jacksonville, Florida.  
20 And with numerous dredging projects, numerous bridges  
21 being built, new roads being cut in, what is often left  
22 out is the negative impact and trying to mitigate those  
23 negative impacts on Gullah-Geechee families and on our  
24 cultural heritage resources that are within the cultural  
25 landscape that is a national heritage corridor, national

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1 heritage area.

2           This project, fits in the Gullah-Geechee  
3 National Heritage Area. So we need to ensure that all  
4 of the negative environmental impacts, as well as any  
5 impacts on lowering the quality of life or the  
6 displacement of Gullah-Geechees is considered, as well  
7 as what happens when you further dredge and what types  
8 of things will happen environmentally, and the creatures  
9 that are within the wildlife refuge that will get  
10 displaced by some points of the project crossing through  
11 what has been federal land that was supposed to protect  
12 it.

13           My greatest concern in the environmental  
14 regard is the fact that because all of this has taken  
15 this series of years, beyond a decade, we have seen now  
16 king tides, we have seen sea level rise, and we have  
17 survived and thrived through several other hurricanes

18 and major storms. So now, how is this project being  
19 evaluated as we go forth in terms of what the future  
20 will hold? Because as has already been stated  
21 eloquently by your team, this is a future project, so we  
22 want to make sure the future does not remove any more of  
23 the Gullah-Geechee culture and tradition from this land.

24 As we always say, the water to bring we, the  
25 water is gonna take we back. But we want to not be

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1 flowed out with the tide of this change. Thank you,  
2 very much.

3 (Applause.)

4 LT. COL. LUZZATTO: Milton Woods.

5 MR. WOODS: No comment.

6 LT. COL. LUZZATTO: All right. Lafayette  
7 Webber.

8 MR. WEBBER: Good afternoon. My name is  
9 Lafayette Webber, and I am a retired longshoreman out of  
10 the Port of Savannah, Georgia. One of my major concerns  
11 about this major project is the roadways. And we just  
12 recently put a bridge here at the foot of the Savannah  
13 Bridge, that should have been four lanes, really,  
14 because it's a major congestion there. It has become a  
15 very serious hazard there at the foot of that bridge.

16 And also the 170 Highway, along with 17,

17 needs to be four lanes or three lanes because we need a  
18 lane for the locals that drive slow, we need a lane for  
19 the fast drivers, and we need a lane for y'all Yankees  
20 that drive real fast. But these -- it needs to be  
21 really considered as far as three lanes, 170, two lanes  
22 in at least 17, and three lanes in I95. Because from  
23 the Georgia three-lane, I would say until Exit 33, I  
24 think it needs to be seriously considered. Thank you.

25 (Applause.)

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1 LT. COL. LUZZATTO: That is everyone I have  
2 on my list. Is there anyone else who would wish to make  
3 a comment at this time? Anyone else? Okay. Thank you.

4 The public comment portion of tonight's  
5 meeting is now concluded. I would like to thank  
6 everyone for attending tonight's meeting and providing  
7 your input about the proposed project. I would  
8 encourage you, if you have comments or concerns that  
9 were not addressed tonight, to make sure that you  
10 consult the project website that's in the handouts  
11 there. For additional information about the proposed  
12 project and updates regarding the status of the EIS,  
13 will be provided -- provide us comments via U.S. Mail.  
14 I will be receiving comments until March 1, 2017, as  
15 part of the scoping process.

16 I really appreciate you being here tonight.  
17 For the record, it is now 7:49 p.m., and this meeting is  
18 officially adjourned. Thank you, very much.

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Julie Bonomo, Court Reporter 843-609-9212

1 STATE OF SOUTH CAROLINA )  
 )  
2 COUNTY OF CHARLESTON )

3

I, Julie L. Bonomo, Professional Court Reporter and  
4 Notary Public for the State of South Carolina at Large,  
do hereby certify that the foregoing meeting was taken  
5 at the time and location therein stated; that the  
testimony was recorded stenographically by me and were  
6 thereafter transcribed by computer-aided transcription.

7 I further certify that I am neither related to nor  
counsel for any party of the cause pending or interested  
8 in the events thereof.

9 Witness my hand, I have hereunto affixed my official  
seal this 20th day of February, 2017, at Charleston,  
10 Charleston County, South Carolina.

11

12 \_\_\_\_\_  
Julie L. Bonomo  
13 Professional Court Reporter  
My Commission Expires  
14 July 23, 2017

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Julie Bonomo, Court Reporter 843-609-9212



## **Appendix F**

### **Original Comment Documents**

**Public Comment Documents**  
**(private citizens, citizen groups, private businesses, and NGOs)**

# SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270

463 KING STREET, SUITE B  
CHARLESTON, SC 29403-7204

Facsimile 843-414-7039

March 1, 2017

Via U.S. Mail and E-Mail

U.S. Army Corps of Engineers  
Charleston District  
c/o Nat Ball, Project Manager  
69-A Hagood Ave.  
Charleston, SC 29403  
[www.comments@JasperOceanTerminalEIS.com](mailto:www.comments@JasperOceanTerminalEIS.com)

**Re: Jasper Ocean Terminal – Scoping Comments; SAC 2015-01238**

Dear Mr. Ball:

The Southern Environmental Law Center submits these comments on behalf of the Coastal Conservation League, Savannah Riverkeeper, South Carolina Wildlife Federation, and One Hundred Miles (the “Conservation Groups”) in response to the Notice of Intent to Prepare a Draft Environmental Impact Statement for the Proposed Jasper Ocean Terminal in Jasper County, South Carolina, SAC 2015-01238. Thank you for the opportunity to submit these scoping comments on the proposed Jasper Ocean Terminal Project (the “Terminal” or “Project”).

**The Project**

According to the public notice, the Project includes the construction and operation of a new marine container terminal on an approximately 1,500-acre site along the north bank of the Savannah River at approximately River Mile 8 in Jasper County, South Carolina. Terminal operations would include the receipt and transfer of containerized cargo between container ships, over-the-road trucks, and intermodal rail cars. A 2.4 mile long pile-supported wharf would be designed to simultaneously accommodate approximately eight Neo-Panamax containerships. A 480-acre container storage yard would hold an estimated 210,000 slots for 20-foot shipping containers and 10,900 refrigerated containers. An intermodal rail yard would include 13.9 miles of internal track and be designed to accommodate unit trains of up to 1.7 miles long. Some 240 truck transfer slots would process up to 1,200 transactions per hour, and gate facilities would operate 16 hours per day, 5 days/week to allow entering and exiting truck traffic. The proposed Terminal would also include additional industrial elements, including administrative buildings, equipment service facilities, a water tower, underground utilities, electrical substations, backup generators, high-mast lighting, stormwater management facilities, perimeter fencing, and parking areas for personal vehicles.

With the Terminal site located about 4.5 miles from the nearest roadway infrastructure and 5.5 miles from the nearest rail infrastructure, the Project also includes significant

transportation elements, including the construction of a new 4-lane divided highway corridor between the terminal and U.S. 17, a double track rail corridor between the terminal class 1 rail lines, and a new rail bridge across the Savannah River. Utility lines and intermediary facilities are also proposed to connect the terminal to existing services. Likewise, navigation improvements include new work and maintenance dredging of berths, an access channel, and a turning basin, as well as shoreline stabilization, bulkhead, and wharf construction adjacent to the existing Savannah Harbor federal navigation channel.

Savannah's existing Garden City Terminal is already the largest single container terminal in the U.S.;<sup>1</sup> the Project would place an even larger container port just a few miles downstream in the Savannah Harbor. As proposed, the Terminal will have the capacity to move 7 million Twenty-Foot Equivalent Units (TEUs) each year. For comparison, the two existing Savannah terminals moved 3.6 million TEUs in 2016.<sup>2</sup> The South Carolina State Ports Authority ports (5 terminals in Charleston, plus Georgetown and Greer) together moved 1.9 million TEUs in 2016.<sup>3</sup> In other words, Savannah and the South Carolina ports collectively handled some 5.6 million TEUs in 2016, significantly less than the Project's capacity. Perhaps even more striking, the six terminals at the Port of New York and New Jersey, the largest port on the East Coast, combined to move 6.25 million TEUs in 2016, also less than the capacity of the Project. As Terminal project manager Michael Rieger of contractor Moffat and Nichol has publicly stated, "Nothing in the United States is close to the size of this project."<sup>4</sup> With this in mind, the Conservation Groups appreciate the Corps' decision to prepare an EIS and expect the Corps to undertake a detailed environmental review commensurate with the scale of the Project and its significant environmental impacts. We look forward to learning more about the Project and engaging with the Corps throughout the environmental review process.

### **Summary Comments**

The public notice provided a preliminary list of issue categories that "may" be addressed in the EIS. The Conservation Groups agree that the EIS should comprehensively address each of these identified issue categories. This letter provides further detail regarding the specific issues that should be addressed in the EIS through a robust and careful evaluation of how this project would impact these resources.

To satisfy NEPA, the EIS must describe the purpose and need for the proposed action and must consider all reasonably foreseeable, significant, adverse impacts of the proposed action.<sup>5</sup> The EIS must assess the cumulative and indirect impacts of the proposed action, including

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<sup>1</sup> Georgia Ports Authority, <http://www.gaports.com/PortofSavannah.aspx> (last accessed February 23, 2017).

<sup>2</sup> Georgia Ports Authority, *By the Numbers*, <http://www.gaports.com/Portals/2/Market%20Intelligence/Monthly%20TEU%20Throughput%20January%202017.pdf> (last accessed Feb. 23, 2017).

<sup>3</sup> South Carolina Ports, *Historical Container Volumes*, <http://www.scsps.com/wp-content/uploads/gl078-pc-teu-history.pdf> (last accessed Feb. 23, 2017).

<sup>4</sup> J. Lawrence, *Developing Port Will 'Transform' Jasper*, JASPER SUN TIMES (May 4, 2016), available at: <http://www.jaspersuntimes.com/news/2016-05-04/developing-port-will-%E2%80%98transform%E2%80%99-jasper>.

<sup>5</sup> 40 C.F.R. § 1502.13, 16.

reasonably foreseeable expansions in the scope of the proposed action,<sup>6</sup> and must also consider all reasonable alternatives to the proposed action.<sup>7</sup>

1. Purpose and Need for the Project. An agency preparing an EIS must specify the underlying “purpose and need” for the proposed action.<sup>8</sup> The framing of the project’s “purpose and need” is crucial because it provides a context which defines the range of “reasonable alternatives” that must be evaluated in the EIS.<sup>9</sup> An agency cannot “slip past the strictures of NEPA” by “contriv[ing] a purpose so slender as to define competing ‘reasonable alternatives’ out of consideration.”<sup>10</sup>

The Corps may not uncritically accept the project proponents’ stated need for the Project. Rather, the agency must independently assess forecasted growth in the demand for containerized cargo within the region and whether likely shipping demand can be reasonably accommodated at existing regional ports, including, but not limited to, Charleston, Savannah, and Jacksonville. The Corps should project containerized cargo traffic in the region using detailed data regarding throughput at individual ports, regional manufacturing capacity and output, and other detailed economic data. The Corps must also critically analyze and document any assumptions regarding: (1) future capacity upgrades at existing regional port facilities; (2) overall trends in global trade; (3) projected changes to U.S. trade policy, including new import tariffs or changes to existing trade agreements that may affect trade volume; (4) projected regional trends in manufacturing capacity; (5) projected regional trends in population growth, (6) any other factors that may influence the regional demand for containerized cargo. Only by thoroughly analyzing all of these factors can the Corps determine the need for the Terminal, which would significantly expand total regional shipping capacity. If projected demand cannot be reasonably accommodated by existing facilities, the Corps must consider how much additional capacity is actually needed to meet demand and to what extent that capacity can be provided by alternatives to the proposal, such as upgrades to existing regional port facilities.

2. Alternatives Analysis. The alternatives analysis required by NEPA is “the heart of the environmental impact statement.”<sup>11</sup> The Corps must “[r]igorously explore and objectively evaluate all reasonable alternatives,” including a “no action” alternative, and “[d]evote substantial treatment to each . . . so that reviewers may evaluate their comparative merits.”<sup>12</sup> The discussion of available alternatives should also include “reasonable alternatives not within the

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<sup>6</sup> *Id.* § 1502.16.

<sup>7</sup> 42 U.S.C. § 4332(C)(iii), (E); 40 C.F.R. § 1502.1.

<sup>8</sup> 40 C.F.R. § 1502.13.

<sup>9</sup> *City of Carmel-by-the-Sea v. Dep’t of Transportation.*, 123 F.3d 1142, 1155 (9th Cir. 1995) (citing *Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 192 (D.C. Cir. 1991)).

<sup>10</sup> *Simmons v. U.S. Army Corps of Eng’rs*, 120 F.3d 664, 666 (7th Cir. 1997). *See also Tex. E. Transmission L.P.*, 146 FERC ¶ 61,086, P 91 (2014) (citing cases) (use of applicants’ identified purpose and need “is subject to the admonition that a project’s purpose and need may not be so narrowly defined as to preclude consideration of what may actually be reasonable choices”); *Nat’l Parks & Conservation Ass’n v. Bureau of Land Mgmt.*, 606 F.3d 1058, 1072 (9th Cir. 2010) (if agency uncritically adopts project proponent’s goals as the purpose and need, it violates NEPA because it “necessarily consider[s] an unreasonably narrow range of alternatives.”).

<sup>11</sup> 40 C.F.R. § 1502.14.

<sup>12</sup> *Id.* § 1502.14(a), (b).

jurisdiction of the lead agency.”<sup>13</sup> The Project’s harm to the environment and the relative degree to which each alternative would meet the Project purpose over time, including foreseeable induced development as a result of the Project, must be considered as part of this study.<sup>14</sup>

As indicated above, the Corps should evaluate alternatives that would meet future demand for containerized cargo through capacity upgrades at existing regional port facilities. The EIS should evaluate alternatives to accommodate Neo-Panamax and Post-Panamax vessels through other regional ports and assess whether regional rail infrastructure upgrades could help increase regional shipping capacity with less environmental impact than the proposed Project.

The EIS should also assess a range of alternatives for the scale of the Project between the no-action alternatives and the proposed action. For example, the proposed Terminal is scaled to simultaneously accommodate 8 berthed Neo-Panamax vessels. The Corps should evaluate whether a smaller Terminal that could accommodate fewer vessels would have less impact to the environment and natural resources.

The Conservation Groups also understand that permitted LNG export facilities at Elba Island may impair container ship traffic to the Terminal while LNG ships are in transit or docked at Elba Island. Because of this, the Corps should consider a “No LNG” alternative that assesses whether a smaller Terminal facility could meet projected demand in the absence of conflicts with LNG import and export traffic.

The EIS should include an evaluation of alternative routes for the Project’s road and rail corridors to identify routes connecting to the existing transportation network infrastructure that minimize environmental impacts, including impacts to wetlands and other critical resources.

Finally, while the public notice indicates that a separate feasibility study will be completed to determine whether additional dredging of the navigation channel is required to support the Terminal, such potential dredging is a reasonably foreseeable impact from the Terminal itself and should also be addressed in the EIS. If dredging of the Savannah Harbor is determined to be needed to accommodate development and operation of the Terminal, a range of alternative dredging depths should be evaluated as part of the EIS.

3. **Indirect and Cumulative Impacts.** As a shipping terminal, the Project will have environmental impacts extending well beyond the Terminal site. Massive cargo ships will traverse the entire globe transporting containers to and from the Terminal. Trucks and trains will travel across hundreds or thousands of miles of regional highways and smaller roadways coming and going from the Terminal. The geographic scope of the EIS should be broad enough to cover the impacts of these related transportation activities, including traffic and congestion, as well as air quality, water quality, noise, and other impacts discussed further below.

For example, a recent Environmental Assessment for a proposed project to construct a new bridge across the Back River and widen 4.2 miles of highway (U.S 17) straddling the South Carolina-Georgia described the highway project as “critical infrastructure for the future Jasper

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<sup>13</sup> *Id.* §1502.14(c).

<sup>14</sup> 40 C.F.R. §§ 1502.14(d), 1508.8.

Ocean Terminal,” demonstrating the close relationship between the Terminal and ongoing highway widening efforts.<sup>15</sup> This widening project and any other Project-related transportation projects must be considered in the cumulative impacts assessment of the EIS.

A significant expansion of regional shipping capacity, the Terminal would also be expected to lead to additional development activities throughout the region. New warehouses, truck yards, and industrial facilities would likely be built in response to development of the Terminal. If significant numbers of jobs are created by the Project, as anticipated by project proponents, this will lead to further large-scale induced development needed to accommodate this additional workforce, including residential, commercial, and institutional facilities.<sup>16</sup> Additional transportation and utility infrastructure would be needed to accommodate such growth across the region and should be evaluated in the EIS.

The EIS also needs to address the cumulative impacts of the Project in conjunction with other reasonably foreseeable port expansion projects throughout the Southeastern region. For example, the Savannah Harbor Expansion Project and the new Hugh K. Leatherman Terminal at the Port of Charleston are both currently under construction to boost capacity at these port facilities. Further, several projects at the Port of Jacksonville will expand the efficiency and capacity of that port facility, including planned harbor deepening, the Mile Point Project currently under construction, and installation of larger cranes and other infrastructure improvements. All of these projects will have impacts on regional shipping capacity, contributing to similar impacts on a wide variety of regionally-shared resources, including water quality, fish and wildlife including ESA-listed species, the regional transportation network, wetlands, energy use and greenhouse gases, as well as others. All reasonably-related impacts from these similar proposed projects should be included in the cumulative impacts assessment of the EIS.

### **Specific Issues and Recommendations**

1. **Transportation – Roadways and Railroads.** With seven million TEUs projected to move through the Terminal each year, the local and regional impacts to roadway and railway congestion are likely to be considerable. The EIS should carefully assess the capacity of existing

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<sup>15</sup> U.S. Department of Transportation, Federal Highway Administration, South Carolina Department of Transportation, Environmental Management Office, Environmental Assessment: U.S.17 (Speedway Boulevard) Improvements and New Bridge Over Back River, Hutchinson Island in Chatham County, Georgia, to S.C. 315 in Jasper County, South Carolina 4-3 (Feb. 6, 2017), available at: <http://www.dot.state.sc.us/inside/pdfs/US17/US%2017%20Final%20EA%20February%202017.pdf>.

<sup>16</sup> As James Allgood, Joint Project Office chairman and Georgia Ports Authority vice chairman has previously indicated, “For the South Carolina communities adjacent to the project, its development will have a massive effect. Phase 1 will bring along thousands of industrial jobs in southern Jasper County.” J. Lawrence, *Developing Port Will ‘Transform’ Jasper*, JASPER SUN TIMES (May 4, 2016), available at: <http://www.jaspersuntimes.com/news/2016-05-04/developing-port-will-%E2%80%98transform%E2%80%99-jasper>. Similarly, Jackson County Council Chairman Marty Sauls has stated regarding the Project: “If the size doesn’t get you excited then I don’t know what will. Many people over the last decade have brought us to where we are today. We are truly making history. What the future holds is going to transform the economic landscape not only of South Carolina and Georgia but the entire East Coast.” *Id.* Given that the Project is intended to have an impact that ripples out far beyond the Terminal site itself, the scope of the NEPA analysis should be broad enough to cover reasonably anticipated indirect and induced effects.

road and rail infrastructure in the region and evaluate whether additional infrastructure will be needed to accommodate this additional road and rail traffic. In addition to freight movement, the traffic impact evaluation should include an assessment of construction-related impacts, impacts from workers traveling to and from the Terminal, and impacts associated with the additional industrial, warehouse, commercial, and residential development likely to be induced by the development of the Terminal. The EIS should include a preliminary cost-estimate of any road and railway improvements needed to accommodate this increased traffic to allow for the public and decision-makers to make an informed cost-benefit assessment regarding the Project.

2. Navigation. With expected capacity to simultaneously berth eight Neo-Panamax vessels and move some 7 million TEUs annually, the Terminal will have a significant impact on navigation in the Savannah Harbor. The EIS should closely evaluate impacts on the existing shipping operations of the upriver Garden City Terminal, recreational traffic in the Savannah River, and vessel traffic in the Intracoastal Waterway, including commercial barge operations. The EIS should also assess the cumulative impacts of operating the Terminal in conjunction with the Elba Island LNG terminal, particularly given the security restrictions associated with LNG shipping that could impede other traffic in the Savannah River Harbor when LNG ships are in transit or berthed at Elba Island.

3. Water Resources – Stormwater Runoff and Groundwater. The EIS should take a close look at Project impacts on water resources, including water quality in the Savannah River. An assessment of stormwater runoff should cover the Terminal site, associated new railway and roadway infrastructure, as well as areas of likely induced development. Particular attention should be paid to the potential for runoff from the Terminal site, which has been built up with dredge spoil that likely contains high levels of cadmium and other contaminants. The EIS should also evaluate the potential impacts on groundwater resources associated with potential dredging activities, including saltwater intrusion into the Floridan aquifer as well as the introduction of other contaminants through a reduction in the depth of the overlying aquitard protecting the aquifer. Impacts to groundwater would affect not only numerous rural well users, but the City of Savannah's water supply. Due to the significance of these resources, the EIS should include a numerical groundwater flow model with salt water intrusion simulation capabilities to rigorously evaluate the potential risk of aquifer contamination. Details of this model should be made available for public review without the need to purchase expensive proprietary software.

4. Federally Listed Threatened or Endangered Species. The EIS should evaluate the Project's impacts on threatened and endangered species listed under the federal Endangered Species Act, as well as species protected under South Carolina and Georgia state law. This evaluation should, at minimum, cover Shortnose sturgeon and Atlantic sturgeon, manatees, and sea turtles, as well as the critically endangered North Atlantic right whale and its critical habitat along the southeastern U.S. coast. Sturgeon in the Savannah Harbor are likely to be negatively impacted by dredging activities, particularly in light of the waterway's current impaired status due to low levels of dissolved oxygen. Dredging activities associated with the Savannah River Expansion Project (SHEP) are already causing lethal take of Atlantic sturgeon, as well as loggerhead, Kemp's Ridley and green turtles, and additional non-lethal take (relocation) of



threatened and endangered species.<sup>17</sup> Cumulative impacts on protected species of the Project and the SHEP should be closely examined in the EIS. Increased ship traffic levels are also likely to lead to more vessel strikes and “take” of manatees, sea turtles, and North Atlantic right whales, requiring a Biological Opinion and take permit for the Project.

5. Wetlands and Waters of the U.S. Initial project documents indicate that approximately 439 acres of navigable waters are expected to be dredged, not including potential navigation channel deepening, while about 54 acres of wetlands and other waters of the U.S also may be impacted by the Project. The EIS should take a close look at these impacts and whether other not-yet identified wetland areas may be affected. The EIS should also closely evaluate potential water quality impacts. The stretch of the Savannah River through the harbor and into the estuary currently fails to meet Georgia’s water quality standards for dissolved oxygen (“DO”), with this river segment currently listed on Georgia’s CWA Section 303(d) list as impaired for DO. The EIS should take a hard look at whether the Project, including associated dredging activities, may exacerbate existing water quality problems and evaluate the Project’s compliance with South Carolina and Georgia state water quality standards, including the anti-degradation standard, as well as the Clean Water Act Section 404(b) guidelines. The EIS should also assess the water quality impacts associated with increased vessel traffic, including wastewater discharges and the potential introduction of invasive species from ballast water discharges.

6. Sediment Quality and Dredging. Sediments underlying the Savannah River are known to contain high levels of cadmium and other contaminants. The EIS must consider the impacts associated with disturbing these sediments through dredging activities, as well as the safe disposal of all dredged material.

7. Land Use and Zoning. The Project may have significant direct and indirect effects on land use and zoning in the region. Under NEPA regulations, “indirect effects” are defined as:

Indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.<sup>18</sup>

Among other effects, NEPA “requires agencies to consider the significance of growth induced by the federal action.”<sup>19</sup> If project proponents’ projections are accurate, the project will radically transform the natural and built environment of rural Jasper County. The EIS should fully evaluate the potential for this Project to spur additional development and sprawl in Jasper County and surroundings, and any associated impacts on land use and zoning.

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<sup>17</sup> M. Landers, *Dredging Stirs Up More Sturgeon Than Expected*, SAVANNAH MORNING NEWS (April 12, 2016), available at: <http://savannahnow.com/news/2016-06-17/dredging-stirs-more-sturgeon-predicted>.

<sup>18</sup> 40 C.F.R. § 1508.8(b).

<sup>19</sup> *Georgia River Network v. United States Army Corps of Eng’rs*, 334 F. Supp. 2d 1329, 1344 (N.D. Ga. 2003).

8. Noise and Vibration. The EIS should carefully analyze the impacts of noise and vibration associated with the Project. In addition to construction noise and vibrations (including pile driving activities), the EIS must also look at long-term noise and vibration impacts associated with vessel traffic (including engine noise and fog horns), crane container operations (including dropped containers), and train and truck traffic (at the Terminal site, on the new road and railways, and extending onto the existing regional transportation network). In light of the quiet, rural nature of the Terminal site and surroundings, this evaluation should encompass impacts on human health, welfare, and enjoyment of peace and quiet, as well as impacts on fish and wildlife.

9. Flood Hazards and Floodplain Values. With the Terminal proposal including the hardening of over two miles of shoreline and negative impacts to many acres of wetlands, the EIS should evaluate the potential for the Project to exacerbate flood hazards, including hazards of hurricane-induced storm surge. This evaluation should take into account projected levels of sea level rise over the next 100 years at least, including an assessment of potential flooding in areas likely to be developed in response to the Terminal.

10. Air Quality. Port facilities and associated transportation activities can have significant local and regional impacts on air quality. The EIS should assess air quality impacts associated with Terminal operations, as well as vessel, train, and truck traffic to and from the Terminal. The EIS should also project long-term impacts on regional air quality associated with the large-scale development induced by the Project and the projected transformation of rural Jasper County into a hub of global commerce.

11. Socioeconomics and Environmental Justice. The EIS should take a close look at the socioeconomic and environmental justice concerns associated with development of this massive Project in an economically-disadvantaged, rural area. Particular concern should be paid to potential impacts on the cultural integrity of the Gullah Geechee Nation.

12. Visual Resources/Aesthetics. The EIS should include an assessment of the Project on visual resources and aesthetics, including providing clear visual depictions of the proposed facilities from a variety of nearby vantage points as well as from across the Savannah River.

13. Fish and Wildlife Values. In addition to the specific impacts to ESA-listed species, the EIS should take a comprehensive look at potential impacts to a wide range of fish and wildlife resources. Water quality impacts associated with stormwater runoff, dredging activities, and construction should be evaluated in light of the already-impaired conditions of the Savannah Harbor. Impacts on the Tybee Island National Wildlife Refuge, the Savannah National Wildlife Refuge, commercial and recreational fisheries, migratory birds, and other species should be closely evaluated. The cumulative impacts of the project in conjunction with the SHEP should also be assessed, particularly in light of significant uncertainty regarding the effectiveness of Speece Cones being installed by the Corps as mitigation for SHEP's negative impacts on DO levels in the Savannah Harbor.

14. Light. The EIS should evaluate the ways in which light pollution from the Terminal, all road and railway infrastructure, and induced development areas is likely to affect

migratory birds, sea turtles, and other species, as well as the human environment, including any impacts to the rural character of Jasper County.

15. Historic Properties. With significant historic resources in the vicinity of the Terminal site and region, an assessment of impacts on historic resources is essential. In addition to identified sites with historical significance related to colonial period, the Revolutionary War, and the Civil War, the EIS should evaluate potential impacts on pre-colonial Native American sites and historic Gullah-Geechee sites. This evaluation should encompass the Terminal Site, the transportation corridor, as well as a general assessment of historic resources in areas likely to face induced development pressure as a result of the Project.

16. Recreation. The EIS should assess impacts on recreational activities, with particular focus on water-borne recreation, including boating, fishing, oyster harvesting, and shrimping, as well as bird-watching at the Tybee Island National Wildlife Refuge. These activities face significant risk of impairment as a result of increased container vessel traffic, particularly in light of the increased size of the Neo-Panamax vessels that would call on the Terminal.

17. Public Health and Safety. There are numerous public health and safety concerns associated with the Project that should be evaluated in the EIS. These include the risk of additional traffic fatalities associated with increased traffic congestion, as well as emergency response delays caused by such congestion. Air quality and water quality impacts discussed above also have significant public health implications, including potential impacts to Savannah's drinking water supply. There are further public safety risks associated increased cargo ship traffic in the narrow Savannah Harbor navigation channel and potential conflicts between passing ships as well as with recreational vessels. The proximity of the Elba Island LNG terminal to the Terminal amplifies the magnitude of potential public safety impacts associated with a vessel to vessel collision or other incident and should be considered in a public health and safety risk assessment.

18. Sea Level Rise and Shoreline Erosion. With sea levels projected to rise by up to two meters by the year 2100,<sup>20</sup> the EIS should evaluate the long-term viability of the Terminal under such expected conditions. The EIS should also assess whether the Terminal, and its more than two miles of hardened shoreline, may contribute to increased shoreline erosion at other areas in the Savannah River Harbor.

19. Hazardous Waste and Materials. The EIS should analyze the safety of any hazardous materials used in Project construction, as well as evaluate any plans for long-term safe disposal of any hazardous waste generated at the Terminal site. Further, the development of the Project will also lead to additional transport of hazardous waste and materials to and from the Terminal, meaning more potential for spills, leaks, and other accidents involving hazardous

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<sup>20</sup> B. Dennis & C. Mooney, *Scientists nearly double sea level rise projections for 2100, because of Antarctica*, WASHINGTON POST (Mar. 30, 2016), available at: [https://www.washingtonpost.com/news/energy-environment/wp/2016/03/30/antarctic-loss-could-double-expected-sea-level-rise-by-2100-scientists-say/?utm\\_term=.0346ee9e147e](https://www.washingtonpost.com/news/energy-environment/wp/2016/03/30/antarctic-loss-could-double-expected-sea-level-rise-by-2100-scientists-say/?utm_term=.0346ee9e147e); R. DeConto & D. Pollard, *Contribution of Antarctica to Past and Future Sea-Level Rise*, NATURE (Mar. 2016).

materials and waste at sea, at the Terminal site, and on regional railways and roadways. All of these impacts should be addressed in the EIS.

20. Energy Use and Greenhouse Gases. Global trade is a major contributor to greenhouse gas emissions and climate change. The EIS should take a hard look at the Project's energy use and greenhouse gas emissions, including any onsite power generation, electrical power usage of all Terminal operations, energy use and emissions from transiting ships, trucks, and trains coming to and from the Terminal, increased emissions from Project-related traffic congestion, and the energy use and emissions from regional industrial, commercial, and residential development induced by the Project.

### Conclusion

The Conservation Groups appreciate the opportunity to provide the above comments regarding the proper scope of the EIS for the Jasper Ocean Terminal project. We look forward to remaining engaged with the Corps and project proponents throughout the NEPA process to gain a thorough understanding of the project and its significant environmental impacts.

Sincerely,



Christopher K. DeScherer

Daniel L. Timmons

cc (via email only): Tonya Bonitatibus  
Rikki Parker  
Ben Gregg  
Megan Desrosiers  
Chuck Hightower  
Thomas McCoy  
Kelly Laycock  
Pace Wilber  
Bob Perry  
Russ Webb  
Daniel Burger  
Priscilla Wendt

Savannah Riverkeeper Comments for the Jasper Ocean Terminal EIS Scoping Meeting  
1/31/2017

1. The cohesive effects of Elba Island and Jasper are not being considered together adequately. They are directly across the river from each other, yet both seem to be moving forward as if in a vacuum. The recent permit issuance from FERC completely failed to look at the potential port despite clear regulatory requirements to consider any foreseeable projects. Jasper is clearly a foreseeable project and was 9 months ago when the permit was issued. Elba states they will have 350 million cubic feet of natural gas a day leaving from their facility. Natural gas ships completely close down the harbor while they are at berth. How is that going to impede Jasper and commercial traffic? What kind of safety issues are being considered for the Jasper Ocean Terminal with large amounts of natural gas stored so close by?

2. As our case against the Savannah Harbor deepening showed, we are opposed to additional dredging. Why is dredging separate from Jasper being considered? Is it because 47' will work for the Jasper Ocean Terminal? What is the likelihood or timeline for an EIS on additional deepening?

3. The project seems to have an high number of stream and marsh crossings between the roads and rail lines. We demand the least impactful offshoot infrastructure possible, with an emphasis on retaining the flow and function of the marshes being impacted. Our marshland is already decreasing. We want a full analysis on the changes of flow expected from Jasper and the adjoining roads, including the effects on adjacent marshlands and riverine bottoms and habitat. We also want a complete study of the storage and flow changes expected from the vast amounts of stormwater runoff this site will create.

4. Traffic to and from the site is a huge concern. Construction, rail, and truck traffic will create large amounts of congestion in the area. What improvements will be needed for the Talmadge Bridge to accommodate increased traffic? What will be needed on US 17 and how will you make sure this increased truck traffic, and its accompanying air quality and vibration/weight issues are mitigated?

5. A complete and thorough analysis of the dredged material on which the terminal is being built on, and the potential for contaminants leaking out of the dredge spoils. What are the contaminants of concern and how will they be prevented from getting into the water column?

6. We would like a thorough archeological study performed on the site, and an active conversation with the Yemmasee and Gullah-Geechee communities as stakeholders in this process, ensuring their interests are represented.

7. Light pollution for those living on Richardson Creek and the surrounding areas will need to be considered, as well as the potential effects it could have on nesting and hatchling sea turtles on Tybee and the other nearby islands.

Coastal Office  
428 Bull Street, Suite 210  
Savannah, GA 31401  
tel 912.447.5910  
fax 912.447.0704  
cmcmillan@gaconservancy.org  
georgiaconservancy.org



February 27, 2017

U.S. Army Corps of Engineers, Charleston District  
c/o Mr. Nat Ball, Special Projects Branch  
69-A Hagood Avenue  
Charleston, South Carolina 29403

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John A. Sibley III, Atlanta

\*Executive Committee Member

RE: Scoping Comments for Jasper Ocean Terminal,  
Environmental Impact Statement

Dear U.S. Army Corps of Engineers:

The Georgia Conservancy is pleased to provide scoping comments for the Jasper Ocean Terminal (JOT) Environmental Impact Statement (EIS), on the Savannah River in Jasper County, South Carolina.

Founded in 1967, The Georgia Conservancy is one of Georgia's oldest nonprofit conservation organizations. Working to protect our coast for 50 years now, the Georgia Conservancy is a statewide organization whose goal is to develop practical conservation solutions for protecting Georgia's environment. We reach policy decisions with a vision statement centered on *a Georgia where people and the environment thrive*.

The magnitude of the proposed terminal, at this critical location, opposite Elba Island and immediately northeast of downtown Savannah, Georgia, is of significant concern. The comments and questions in this letter are derived from our Coastal Policy and are based on the development and operation data prepared by the Corps of Engineers (COE) for JOT and the Savannah Harbor Expansion Project (SHEP).

The issues presented in this comment letter center on the project's operational and cumulative impacts. The JOT is a very large project that must be thought of as being at the interface of several functioning ecosystem. The riverine and saltmarsh ecosystems, where the JOT is located, provide a nursery for commercially and recreationally valued species of fish, shellfish, and other wildlife. This area is a valuable ecological and recreation resource.

The States of Georgia and South Carolina have stewardship roles with respect to coastal marshlands, waterbottoms, and estuarine systems that are critical to preserving the integrity of the tidal freshwater wetland and saltmarsh ecosystem and the public's enjoyment of our common coastal treasures.

These coastal land and water resources provide habitat for more threatened and endangered species than any other region of the state. The sum of these resources is a highly integrated, interdependent ecosystem that is vitally linked to Georgia's economy and quality of life. It is essential to promote a healthy, resilient, and diverse coastal ecosystem that can endure natural and human disturbances, continue to perform its functions, and support self-sustaining populations of native fish, birds, wildlife and plants.

- How will dock and construction and channel alterations affect the spawning habitat of fishes, and will it force utilization of less desirable spawning habitats for fish such as the shortnose sturgeon (*Acipenser brevirostrum*)?
- The project includes dredging of 439 acres of navigable waters and has potential impacts to 54 acres of open water. In addition to these direct impacts, will there be changes in flow patterns that alter hydrologic function? How are impacted buffers, cleared areas and wetland impacts to be offset with mitigation? Will mitigation be made in the project area (e.g. within seven [7] miles)? How will floral species of concern be mitigated?
- This project has more than seven miles of access roadway that traverses the southern edge of the Savannah National Wildlife Refuge complex (SNWR). The SNWR serves as a stopover for thousands of migratory birds annually. Many of these birds are already on the threatened or endangered species list, such as the bald eagle (*Haliaeetus leucocephalus*). Other birds that utilize the Savannah Wildlife Refuge include the swallow-tailed kite (*Elanoides forficatus*), purple gallinules (*Porphyrio martinica*), anhingas (*Anhinga anhinga*), and more. How will this project impact the critical habitat located along the rail and roadway corridors that access the main terminal site, and adjoining lands held in conservation easements?
- How will rail and roadway access (culverts, bridges, and detention) maintain natural water flow patterns in the SNWR? How will operations related to wildlife management be altered by this project? Will an adaptive management and monitoring plan be developed related to species of concern at SNWR?
- Will a comprehensive stormwater management system that addresses water quality and quantity be developed for JOT? How will stormwater management at the JOT supplement the freshwater areas of the former rice impoundments?

Responsible planning for growth and conservation of sensitive coastal lands is essential to preserving the integrity of natural coastal systems and, in turn, the health and welfare of coastal residents.

- In what ways will the project benefit the local economy? In what ways will it have economic costs (public, private and ecosystem services)? How will the Jasper County Comprehensive Land Use Plan (CLUP) be updated to reflect the conservation, residential, recreational and industrial uses planned around this project? Will a local planning study guide the project related industrial development so it provides more focused economic benefits to Jasper County? Will consideration be given to terminal workforce housing and transport?
- Has consideration been given to creative use of conservation resources (easements, transfer of density rights, development boundaries, etc.) in the preservation of sensitive habitat and buffering of the site? Compatible use buffers at nearby Fort Stewart and Townsend Bombing Range have served conservation efforts well.
- What lessons from the Savannah Harbor Expansion (SHEP) project adaptive management process will be used to mitigate environmental impacts on this project?
- What specific traffic, light, and sound mitigation and operational measures will be taken to protect surrounding properties and wildlife?
- How will the terminal operations (e.g. noise, lighting, etc.) address migration patterns, foraging and local nesting areas for threatened and endangered bird species?
- Every water body has a carrying capacity in terms of point and nonpoint degradation, bank erosion and safe navigation. How will this this project and SHEP impact nearby tidally- influenced freshwater wetlands and marshes? Will salinity levels increase or remain constant with the models used in the SHEP EIS? If upstream salinity increases, what will be the effect on fish assemblages and wetland distribution?
- This project is across the river from Elba Island facility. Will there be a projection of ship traffic flow for this project and the other operations in the Savannah Harbor? How will water and air pollution and accidental spill contingencies be planned for at the JOT?



Mr. Ball  
Page 4

- Will dissolved oxygen monitoring for SHEP be extended beyond the 10-year period, or modified to account for the JOT construction and operational impacts? Will this project require implementing of additional Speece Cone bubblers to sustain appropriate dissolved oxygen levels?
- How will the data from the SHEP EIS and adaptive management monitoring process be used in the JOT EIS analysis? How will the information be updated and incorporated into the dissolved oxygen mitigation, effects on tidally influenced wetlands, and species of concern such as the native striped bass (*Morone saxatilis*)?
- What will aquifer and groundwater resources be impacts be for this for this project, when considered with SHEP?
- How will sea level rise considerations be incorporated into the site design?
- Potential harm to marine mammals from terminal operations is a critical limiting factor that must be respected. How will the operational and contingency plans for the JOT address fisheries and marine mammal (right whale and manatee) impacts?

Coastal Georgia's rivers and estuaries have historically served as highways for maritime transportation and trade. Future improvements to navigation channels to support port infrastructure and operations must not come at the further expense of estuarine habitat.

Rigorous application and coordination of existing laws and regulations are critical to preserving the coast's ecological integrity as human activity expands.

We look forward to working with federal, state, and local agencies to address the issues in this letter and the other findings of the Draft EIS.

Sincerely,



Charles H. McMillan, III  
Coastal Director  
Georgia Conservancy, Savannah Georgia

February 27, 2017

Mr. Nat Ball  
Special Projects Branch  
U.S. Army Corps of Engineers, Charleston District  
69-A Hagood Avenue  
Charleston, SC 29403

Subject: Go Fast™ Legally and Safely comments on the JOT EIS

Dear Mr. Ball and associates:

We are pleased to provide our thoughts on an alternative approach to transporting the containers from and to the Jasper Ocean Terminal. We believe it is a lower cost approach, and one with a much smaller impact on the environmental issues addressed in the Environmental Impact Study, which was presented at the Scoping Meeting. Today, electromagnetic linear motors are being used to launch fully loaded fighter jets from aircraft carriers and used worldwide for passenger trains, light rail vehicles, people movers and for thrill rides in amusement parks. It is now time to apply this pollution free, high-speed technology to moving shipping containers. We've already developed the details for moving containers to and from seaports and inland ports, then we'll extend the system into major metropolitan areas, with Exchanges along the way at major export manufactures, such as automotive plants, distribution centers of major importers like Amazon and Walmart, and eventually coast to coast. Besides the environmental advantages, the Go Fast Platforms carrying the containers will be traveling at 200 mph in groupings to benefit from the aerodynamic drafting, but uncoupled so that Platforms can leave or join the Guideway without the remaining in-transit Platforms slowing down. A coast-to-coast 3,000-mile trip will take 15 hours. The reduction in in-transit inventories and faster response time will provide a large competitive advantage to those serviced by Go Fast Safely & Legally.™

The attached briefing document addresses the concerns for the wetlands, water, wildlife, air pollution, congestion, public health and safety that are highlighted in the Scoping Meeting display boards and discussed in the formal meeting. It also provides a path for significant cost savings.

We would like to have a face to face opportunity to present this briefing to you, your associates and Adkins, Inc. to obtain your feedback before sharing it widely with other interested parties. You can contact us at:

Neil Harris  
CEO  
XCARD FINANCIAL PARTNERS, LLC  
[neilharris@xcardfinancial.com](mailto:neilharris@xcardfinancial.com)  
(828) 674-1882

Robert (Bob) Brown  
Director  
Go Fast Legally & Safely LLC  
[rgbrown168@gmail.com](mailto:rgbrown168@gmail.com)  
(248)217-1486

We look forward to hearing from you with a suggestion of a place in the Charleston area and possible dates and times so we can exchange thoughts on implementing this alternative solution.

Sincerely,



Bob Brown  
Director  
Go Fast Legally & Safely LLC

enclosure



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## COMMENT FORM

**JOT EIS Public Scoping Meeting  
Tuesday, January 31, 2017  
Public Notice number SAC-2015-01238**

Please note that any information (including personal identifying information) received through this form may be made available to the public online or in a paper docket, unless disclosure of the information is restricted by statute. Do not submit any information that you do not want released to the public. Electronic files should not include special characters or any form of encryption, and should be free of any defects or viruses.

Are you a public official?  **NO**  **YES** If yes, position: \_\_\_\_\_

William L Young  
First and Last Name

400 Euhaw Creek Dr  
Street Address

Ridgeland SC 29936  
Mailing Address (if different from street address)  
City, State, and Zip Code

\_\_\_\_\_  
E-mail Address

\_\_\_\_\_  
Affiliation

How did you learn about this public meeting?

- Newspaper Notice
- Notice in Mail
- E-mail
- Website
- Other (please explain)

OPT OUT:  By checking this box, you are requesting that your personal information **NOT** be included in any public release of comments.

COMMENTS: (Please make additional comments on the back, if needed.)

I worked with the SAV Dist + Corps from 1963 to 1990  
I prepared all dredging and disposal area plans + specs.  
for SAV Dist. and Chatham County (disposal areas) My last 12 years  
I acted as Contracting Officer Rep. on all dredging and disposal  
area contracts.

Comments may be turned in tonight, mailed, or emailed to the address below. Please submit your comments to:

**U.S. Army Corps of Engineers, Charleston District**  
c/o Nat Ball  
69-A Hagood Avenue  
Charleston, SC 29403  
[comments@JasperOceanTerminalEIS.com](mailto:comments@JasperOceanTerminalEIS.com)



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Are you a public official?  NO  YES If yes, position: \_\_\_\_\_

Mary Wright  
First and Last Name

0635 Speedway Rd  
Street Address

Northwoodville, SC 29927  
Mailing Address (if different from street address)  
City, State, and Zip Code

mswright710@gmail.com  
E-mail Address

How did you learn about this public meeting?

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- Website
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\_\_\_\_\_  
Affiliation

OPT OUT:  By checking this box, you are requesting that your personal information **NOT** be included in any public release of comments.

COMMENTS: (Please make additional comments on the back, if needed.)

The Terminal will have a big  
impact on my quality of life  
Noise will be 99.9 percent  
traffic. It will impact the  
structural of my home

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**c/o Nat Ball**  
**69-A Hagood Avenue**  
**Charleston, SC 29403**  
[comments@JasperOceanTerminalEIS.com](mailto:comments@JasperOceanTerminalEIS.com)



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Are you a public official?  NO  YES If yes, position: \_\_\_\_\_

\_\_\_\_\_  
First and Last Name

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
Mailing Address (if different from street address)

Bluffton SC 29909  
City, State, and Zip Code

\_\_\_\_\_  
E-mail Address

How did you learn about this public meeting?

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- Website
- Other (please explain)

\_\_\_\_\_  
Affiliation

OPT OUT:  By checking this box, you are requesting that your personal information **NOT** be included in any public release of comments.

COMMENTS: (Please make additional comments on the back, if needed.)

Please preserve the Savannah Wildlife Refuge + surrounding area -  
 They are important stopover points for migrating birds, etc. Also concerned  
 about noise + pollution from trucks + railways.  
 East Coast Greenway access would be nice too. ECG is an old Road  
 multi-use pathway for pedestrians, cyclists, families, athletes, etc. It is to connect the

Comments may be turned in tonight, mailed, or emailed to the address below. Please submit your comments to: ➔

U.S. Army Corps of Engineers, Charleston District  
 c/o Nat Ball  
 69-A Hagood Avenue  
 Charleston, SC 29403  
[comments@JasperOceanTerminalEIS.com](mailto:comments@JasperOceanTerminalEIS.com)

State of Maine + down East Coast through major cities to Key West  
P2. Connect Charleston SC to Savannah GA by bicycle - not on roads.  
Please do not overdevelop!!

U.S. Army Corps of Engineers, Charleston District  
c/o Nat Ball  
69-A Hagood Avenue  
Charleston, SC 29403

PLACE  
POSTAGE  
HERE

**U.S. Army Corps of Engineers, Charleston District**  
**c/o Nat Ball**  
**69-A Hagood Avenue**  
**Charleston, SC 29403**



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Are you a public official?  NO  YES If yes, position: \_\_\_\_\_

HARRISON FAMILY CHARITABLE TRUST

First and Last Name

501 G. 44 ST.

Street Address

How did you learn about this public meeting?

Newspaper Notice

Notice in Mail

E-mail

Website

Other (please explain)

Mailing Address (if different from street address)

SAVANNAH GA 31405

City, State, and Zip Code

robbie.harrison@portsamerica.com

E-mail Address

Affiliation

OPT OUT:  By checking this box, you are requesting that your personal information **NOT** be included in any public release of comments.

COMMENTS: (Please make additional comments on the back, if needed.)

PLEASE SEE ATTACHED DOCUMENTS.

Comments may be turned in tonight, mailed, or emailed to the address below. Please submit your comments to:

U.S. Army Corps of Engineers, Charleston District  
c/o Nat Ball  
69-A Hagood Avenue  
Charleston, SC 29403  
comments@JasperOceanTerminalEIS.com

ATTACHMENT TO COMMENT FORM  
JASPER OCEAN TERMINAL

February 22, 2017

I represent the Harrison Family Charitable Trust which owns part of the Fife Plantation adjacent to the proposed rail lines for the Jasper port facility (see attached map).

Fife Plantation was founded over 200 years ago for the growing of rice. Our family has been involved with maintaining and preserving it for the past 130 years, at times with great peril from floods, hurricanes, salt water intrusion and fire. Therefore, with the advent of the Jasper Ocean Terminal, we have many concerns, especially with the damages done to the place in the past 40 years, primarily from the changes made to the Savannah River system. We also worry about the effects to the wildlife habitat of our neighbor, the Savannah National Wildlife Refuge which borders Fife and the proposed RR route.

The family comments at this time are of a general nature and cover two basic areas of concern.

1. The effects on the environment, wildlife, and historic areas during the construction and afterwards.
2. The effects the construction and later usage of the rail lines will have on our property which borders the proposed rail lines.

We list herewith some of the main items we would like to discuss with the parties at the appropriate time:

Construction time table

The proposed route of the two rail lines

Names and contact numbers of the individuals from each entity who will be involved with the construction

Anticipated number of trains the first year of operation, fifth year, tenth year.

Will the RR build fences on the west side of the rail line to keep our cattle off the tracks(which the Seaboard did in 1912 when the present line was built)

Trestle(and fill material) construction as it relates to drainage, tide flow, water quality, etc.

Noise pollution/vibration/

We would like to have a meeting at the appropriate time with the USACE, the two ports authorities, the two railroad companies, Jasper County, and any other parties the USACE deem necessary. Please put us on your docket when the timing is right and keep us informed. We would like to have this meeting as soon as possible.

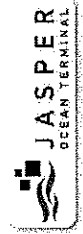
I can be reached at: 912-644-6101 (Of) or 912-507-6891 ©.

Thank you.

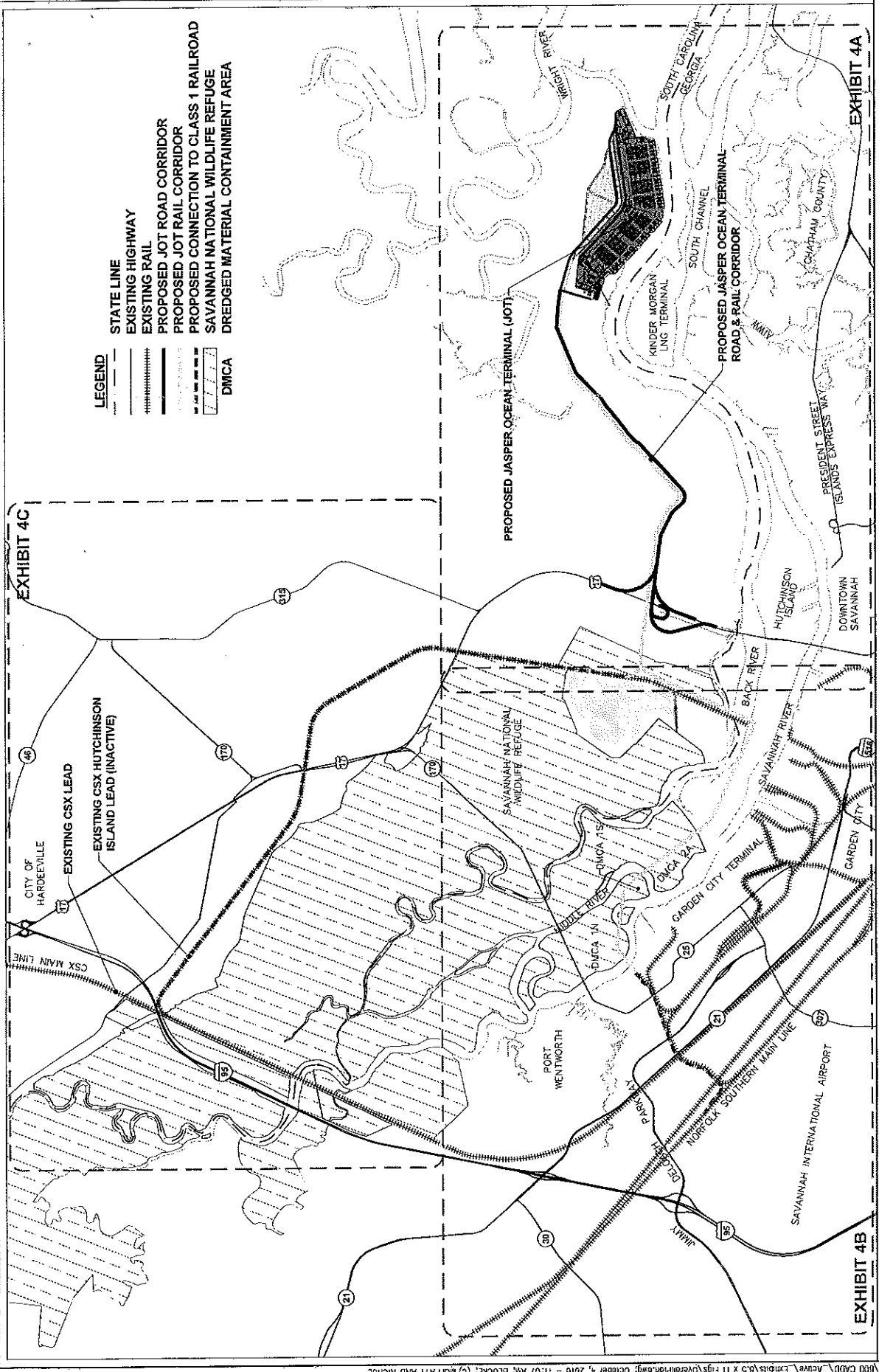
Respectfully submitted,  
HARRISON FAMILY CHARITABLE TRUST

  
Robert Harrison, Managing Trustee





# EXHIBIT 2 - PROJECT OVERVIEW





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# COMMENT FORM

MAR - 2 2017

**JOT EIS Public Scoping Meeting**  
**Tuesday, January 31, 2017**  
**Public Notice number SAC-2015-01238**

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Are you a public official?  NO  YES If yes, position: \_\_\_\_\_

ROBERT & JOSEPH HARRISON

First and Last Name

501 G. 44 ST.

Street Address

SAVANNAH GA 31405

Mailing Address (if different from street address)

City, State, and Zip Code

robbie.harrison@portsamerica.com

E-mail Address

Affiliation

How did you learn about this public meeting?

- Newspaper Notice
- Notice in Mail
- E-mail
- Website
- Other (please explain)

OPT OUT:  By checking this box, you are requesting that your personal information **NOT** be included in any public release of comments.

COMMENTS: (Please make additional comments on the back, if needed.)

PLEASE SEE ATTACHED DOCUMENTS.

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**U.S. Army Corps of Engineers, Charleston District**  
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**69-A Hagood Avenue**  
**Charleston, SC 29403**  
**comments@JasperOceanTerminalEIS.com**

ATTACHMENT TO COMMENT FORM  
JASPER OCEAN TERMINAL

February 22, 2017

My brother, Joseph Harrison, Jr., and I own part of the Fife Plantation adjacent to the proposed rail lines for the Jasper port facility (see attached map).

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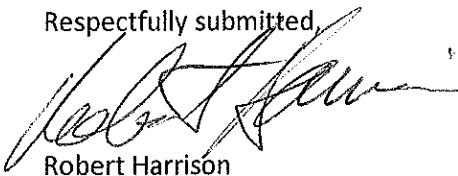
Noise pollution/vibration/

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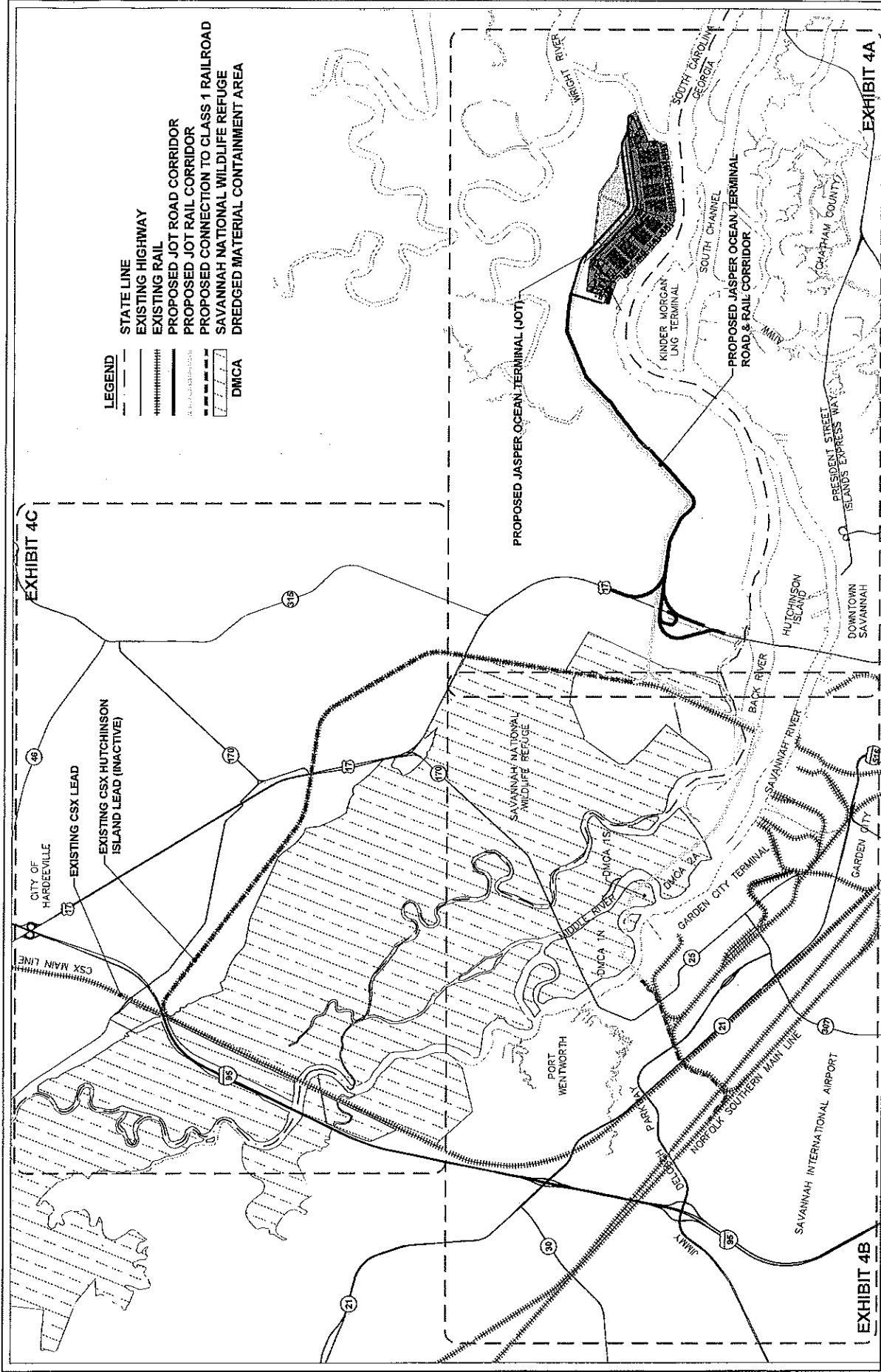
I can be reached at: (OF) 912-644-6101 or © 912-507-6891.

Thank you.

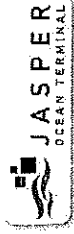
Respectfully submitted,



Robert Harrison



- LEGEND**
- STATE LINE
  - ==== EXISTING HIGHWAY
  - ==== EXISTING RAIL
  - PROPOSED JOT ROAD CORRIDOR
  - PROPOSED JOT RAIL CORRIDOR
  - PROPOSED CONNECTION TO CLASS 1 RAILROAD
  - SAVANNAH NATIONAL WILDLIFE REFUGE
  - DMCA



### EXHIBIT 2 - PROJECT OVERVIEW



## Mash, Lisa R

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**From:** llhllc@gmail.com  
**Sent:** Thursday, February 02, 2017 1:18 PM  
**To:** comments@JasperOceanTerminalEIS.com  
**Subject:** Jasper Port

How is soil instability going to be addressed? This area consists of silty fill deposited over pluff mud. Soil subsidence and very poor load bearing strength will be a continuous issue with this site. Just look at some of the areas in Charleston that were filled years ago and now have buildings with exposed foundations 3 feet higher than existing ground levels.

It will cost millions to drive enough piles just to make it somewhat stable. I know the taxpayers are going to pay for this boondoggle for years to come.

Sent from [Mail](#) for Windows 10

## Mash, Lisa R

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**From:** JOTEISADMINRECORD@atkinsglobal.com  
**Sent:** Tuesday, January 31, 2017 5:51 PM  
**To:** JOT EIS Admin Record  
**Subject:** Affected Environment

New comments submitted on [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_jasperoceanterminaleis.com&d=DwIFAg&c=cUkzcZGZt-E3UgRE832-4A&r=gvM0AiDpLwP-aSVragPwz91Nfk2euWdeXQjK00hYq-C9dC6a4V\\_l1XDkxriv\\_rP&m=BXqt8sS0UYIVwVoNEV26FKRIOTYyp\\_VZTX3qTndkzQ0&s=cazUDLXZ9zNwvObOpK3WG8i0Umwp4BZ1N4wlowoo1W4&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__jasperoceanterminaleis.com&d=DwIFAg&c=cUkzcZGZt-E3UgRE832-4A&r=gvM0AiDpLwP-aSVragPwz91Nfk2euWdeXQjK00hYq-C9dC6a4V_l1XDkxriv_rP&m=BXqt8sS0UYIVwVoNEV26FKRIOTYyp_VZTX3qTndkzQ0&s=cazUDLXZ9zNwvObOpK3WG8i0Umwp4BZ1N4wlowoo1W4&e=)

First Name: Zack

Last Name: Hoffman

Email: zackkhoffman@gmail.com

Affiliation: Local Resident (Talahi Island Resident)

Comment Subject: Affected Environment

Comment: I'm a resident of Talahi Island, just south of the facility location. I have legitimate concern for my property value and the value of those around me. Other adjacent homes for sale have lost potential buyers as soon as they see the tanks of Elba Island across the marsh from their back yards. I'm concerned this view will be much worse than the tanks of Elba Island. The impact to residential property value must be considered and mitigated for. Also of great concern is the noise and light pollution associated with a facility of this size. Furthermore, the impact to the physical environment around the facility will surely be impacted in ways we cannot currently measure.

## Mash, Lisa R

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**From:** JOTEISADMINRECORD@atkinsglobal.com  
**Sent:** Tuesday, January 31, 2017 12:06 PM  
**To:** JOT EIS Admin Record  
**Subject:** Environmental Consequences

New comments submitted on [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_jasperoceanterminaleis.com&d=DwIFAg&c=cUkzcZGZt-E3UgRE832-4A&r=gvM0AiDpLwP-aSVragPwz91Nfk2euWdeXQjK00hYq-C9dC6a4V\\_I1XDkxriv\\_rP&m=zQ47MS4SMzs8dKMa0oUQGtk8x4A9I2Mp\\_aJyzZvKi1E&s=k-DI7xFaWRPbVpymMigfTv26WuVAIlx0pCSyqegf0sE&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__jasperoceanterminaleis.com&d=DwIFAg&c=cUkzcZGZt-E3UgRE832-4A&r=gvM0AiDpLwP-aSVragPwz91Nfk2euWdeXQjK00hYq-C9dC6a4V_I1XDkxriv_rP&m=zQ47MS4SMzs8dKMa0oUQGtk8x4A9I2Mp_aJyzZvKi1E&s=k-DI7xFaWRPbVpymMigfTv26WuVAIlx0pCSyqegf0sE&e=)

First Name: Emily

Last Name: fields

Email: Emily.fields19@yahoo.com

Affiliation: - None -

Comment Subject: Environmental Consequences

Comment: I'm against this. We do not need this.

## Mash, Lisa R

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**From:** JOTEISADMINRECORD@atkinsglobal.com  
**Sent:** Tuesday, January 31, 2017 6:22 PM  
**To:** JOT EIS Admin Record  
**Subject:** Affected Environment

New comments submitted on [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_jasperoceanterminaleis.com&d=DwIFAg&c=cUkzcZGZt-E3UgRE832-4A&r=gvM0AiDpLwP-aSVragPwz91Nfk2euWdeXQjK00hYq-C9dC6a4V\\_I1XDkxriv\\_rP&m=Ejv0qqYyhqKMvYQ2MOBUlxSFnITG2IUkXbsdp23xf6w&s=zu7Fi3phi8eSybqauPsj4iVbvy0Ibgun45qOmUlt9c&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__jasperoceanterminaleis.com&d=DwIFAg&c=cUkzcZGZt-E3UgRE832-4A&r=gvM0AiDpLwP-aSVragPwz91Nfk2euWdeXQjK00hYq-C9dC6a4V_I1XDkxriv_rP&m=Ejv0qqYyhqKMvYQ2MOBUlxSFnITG2IUkXbsdp23xf6w&s=zu7Fi3phi8eSybqauPsj4iVbvy0Ibgun45qOmUlt9c&e=)

First Name: Inaki

Last Name: Azpiazu

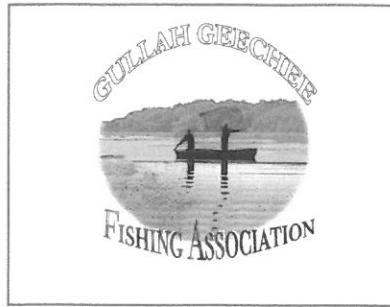
Email: iazpiazu1@yahoo.com

Affiliation: N/A (none)

Comment Subject: Affected Environment

Comment: Surrounded and impacting in an unknown manner three wildlife refuges, sustainable for this project is an adjective that gives cover to anything. We do not know what this sustainable in the project means, it is a qualification judged by government engineers. The project makes a mockery of the tourism industry of Savannah, Tybee Island and South Carolina Islands; nature and the marshes are a major asset for the region and the project could take them out, not immediately but in the near future. That would include the pollution. People want to live in beautiful places and stable, not an expanding industrial zone. Is it a trade off, willing to gamble with the region. The land infrastructure, rails and roads and support, involved in the project is not clear and would at least cut through adjacent marshes that feed the wild life refuges. For me the estimated traffic, the high estimate?, could be absorbed by expanding the Charleston terminals, the structures are there.





January 31, 2017

Dear Mr. Ball and US Army Corp of Engineers:

The Gullah/Geechee Fishing Association would like to be an active part of the scoping that is taking place for the Jasper Ocean Terminal. Due to the fact that the NEPA process requires you to consider a number of factors regarding the environmental impact of this project on the waterway, keep in mind that this is part of the Gullah/Geechee Nation which extends from Jacksonville, NC to Jacksonville, FL. These waterways and the community where the Jasper Ocean Terminal will be placed are home to the unique Gullah/Geechee culture. Native Gullah/Geechee use the waterways to sustain themselves via fishing traditions. Given that the Gullah/Geechee Cultural Heritage Corridor that runs through the Gullah/Geechee Nation is a federal national heritage area, any potential displacement of Gullah/Geechee peoples' homes, businesses, and historic sites needs to be considered as well as any negative impact to the shoreline and water quality where the terminal will be placed.

Negative impacts of the waterways due to any new structures along them could do irreparable harm to the historically used traditional fishing areas of native Gullah/Geechees and block their access points. The impact to the quality of the life of those near the terminal is of great concern given the scope of the construction that is being considered and the massive amount of sound pollution that will come from the standard operations of the terminal. We want to insure that the impacts on the quality of life of the Gullah/Geechee people who are internationally recognized as an indigenous cultural group with international human rights is not negative. They also must continue to have the right to access the waterways to sustain themselves. This must be considered and the environmental impacts of this project must not reduce the quality of life of the people.

We look forward to working with you in this regard.

Peace,

Gullah/Geechee Fishing Association

Post Office Box 821 St. Helena Island SC 29920

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## GULLAH/GEECHEE SEA ISLAND COALITION



[www.gullahgeechee.net](http://www.gullahgeechee.net)

Post Office Box 1207  
St. Helena Island SC  
29920

(843) 838-1171  
[GullGeeCo@aol.com](mailto:GullGeeCo@aol.com)

January 31, 2017

Dear Mr. Ball and US Army Corp of Engineers:

The ***Gullah/Geechee Sea Island Coalition*** desires to be an active part to the NEPA process and scoping of the Jasper Oceans Terminal to insure that the rights of Gullah/Geechee people that live near the site of the proposed project are protected and that their quality of life is not negatively impacted due to displacement of their community nor loss of waterway access points. We are greatly concerned about any environmental pollution and any impacts that will happen to the shoreline and waterway due to the construction of this terminal and the daily operations. These waterways are historically used as part of the Gullah/Geechee fisheries that are throughout the Gullah/Geechee Nation from Jacksonville, FL to Jacksonville, NC.

The location of the proposed Jasper Oceans Terminal is within the federal Gullah/Geechee Cultural Heritage Corridor which is a national heritage area. This area was specifically designated to insure the continuation of Gullah/Geechee cultural heritage and our traditions. So, all projects within this region should take this into account as assessments including those required by the NEPA process are done. We are the premiere organization that protects the rights of Gullah/Geechees, therefore, we seek to engage with you in the process to insure that the environmental impacts do not have adverse effects on our cultural community.

We look forward to working with you throughout the scoping process. Please contact us.

Peace,

A handwritten signature in purple ink that reads "Queen Fuet". The signature is written in a cursive, flowing style.

Chieftess of the Gullah/Geechee Nation

Founder, ***Gullah/Geechee Sea Island Coalition***

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## **Local Agency Comment Documents**



February 28, 2017

Nat Ball

U. S. Army Corps of Engineers, Charleston District

69-A Hagood Avenue

Charleston, SC 29403

Dear Mr. Ball,

The Policy Committee of the Lowcountry Area Transportation Study (LATS), which is the designated metropolitan planning organization (MPO), is interested in working closely with you and your associates as you develop the Environmental Impact Statement for the Jasper Ocean Terminal. Our mandate and our interests are chiefly in the area of surface transportation infrastructure, and we hope to ensure that planning for both new and improved facilities is completed in a comprehensive manner that includes the needs of both area residents and new business opportunities. Preparing for that, our Technical Committee is beginning a review of the LATS Long Range Transportation Plan (LRTP) to incorporate planning for the new transportation system necessary to serve the Jasper Ocean Terminal and supporting growth. We will be happy to provide you with access to our Travel Demand Model with revisions to accommodate port and related vehicle movements along with other data that we have available.

Attached is a map of the regional highway network indicating a five-mile zone of influence for the proposed terminal.

Please let us know what we can do to assist you.

Yours truly,

Lisa Sulka,

LATS Policy Committee Chair

Mayor, Town of Bluffton

## **State Agency Comment Documents**

**WILLOUGHBY & HOEFER, P.A.**  
ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL\*\*  
TRACEY C. GREEN  
BENJAMIN P. MUSTIAN\*\*  
ELIZABETH ZECK\*  
ELIZABETHANN LOADHOLT CARROLL  
CHAD N. JOHNSTON  
JOHN W. ROBERTS  
ANDREW J. D'ANTONI

ELIZABETH S. MABRY  
JAMES PATRICK HUDSON  
OF COUNSEL

JOSEPH H. FARRELL, III  
SPECIAL COUNSEL

\*ALSO ADMITTED IN TX  
\*\*ALSO ADMITTED IN WASHINGTON, D.C.

OFFICES:

COLUMBIA

930 RICHLAND STREET  
P.O. BOX 8416  
COLUMBIA, SC 29202-8416

CHARLESTON

151 MEETING STREET  
SUITE 325  
P.O. BOX 10  
CHARLESTON, SC 29402

AREA CODE 803  
TELEPHONE 252-3300  
TELECOPIER 256-8062

December 21, 2016

**VIA ELECTRONIC MAIL**

Nathaniel I. Ball  
U.S. Army Corps of Engineers  
69-A Hagood Avenue  
Charleston, South Carolina 29403

Re: Jasper Ocean Terminal

Dear Nat:

Please allow this letter to serve as the response of the South Carolina Savannah River Maritime Commission (Commission) to your email dated December 15, 2016 requesting a preliminary list of any permits, certifications, authorizations, as well as issues of importance related to potential effects to specific resources, related to the Jasper Ocean Terminal (JOT). The Commission appreciates this early opportunity to participate in the permitting process for the JOT and provide your office with this background and emphasis of the Commission's permitting authority.

The Commission is an instrumentality of the State of South Carolina and was created by Act No. 56 of 2007. The Commission was established to represent South Carolina in all matters pertaining to the navigability, depth, dredging, wastewater and sludge disposal, and related collateral issues in regard to the use of the Savannah River as a waterway for ocean-going container or commercial vessels. S.C. Code Ann. § 54-6-10(A). Moreover, the Commission is "empowered to negotiate on behalf of the State of South Carolina and enter into agreements with the State of Georgia [and] U.S. Army Corps of Engineers." *Id.* In South Carolina, a permit "is required for any dredging, filling or construction or alteration activity in, on, or over a navigable water, or in, or on the bed under navigable waters, or in, or on lands or waters subject to a public navigational

Mr. Nathaniel I. Ball

December 21, 2016

Page 2

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servitude.” S.C. Code Ann. Regs. 19-450 (Navigable Waters Permit). Under the enabling legislation of § 54-6-10(A), the consideration of impacts on navigable waters and water quality for any application to the Corps on a project impacting the Savannah River within South Carolina, and which requires a Section 404 permit, is bifurcated among the South Carolina Department of Health and Environmental Control (DHEC), for the 401 Water Quality Certification, and the Commission, for the navigable waters permit. *See Savannah Riverkeeper v. S.C. Dep't of Health & Envtl. Control*, 400 S.C. 196, 733 S.E.2d 903 (2012) (holding that the Commission has exclusive responsibility and authority to represent South Carolina in all matters collaterally related to the navigability and dredging of the Savannah River for purposes of navigation by ocean-going vessels).

It is anticipated that the activities involved in the construction of the JOT will adversely impact the water quality and environment in South Carolina and will thus require, among other things, a Navigable Waters Permit from the Commission under Regulation 19-450 and other authorization under the Commission’s statutory authority. The Commission is responsible for assessing the total impact of the projected activity on the navigable waters and lands subject to the jurisdiction of Regulation 19-450, as well as the impact on the economy, environment, and natural resources of South Carolina. In the exercise of its statutory jurisdiction and authority to consider a future JOT permit application, the Commission will consider the utilization and protection of important resources in South Carolina, balancing the extent and permanence of reasonably foreseeable benefits and detriments of a projected activity, including its impact on conservation, economics, aesthetics, general environmental concerns including impacts to wetlands and the disposal of dredge material, cultural values, fish and wildlife, navigation, erosion and accretion, navigability and depth, recreation, water quality, water supply, and conservation. *See* S.C. Code Ann. Regs. 19-450.9A. In addition, the Commission also is tasked with determining whether a projected activity is consistent with the needs and welfare of the public.

Again, the Commission appreciates this opportunity for early involvement and discussion of the Commission’s regulatory authority over the JOT. If you have any questions, please do not hesitate to contact me.

Very truly yours,

**WILLOUGHBY & HOEFER, P.A.**



Chad N. Johnston

cc: T. Parkin Hunter, Esquire (via E-Mail)  
The Honorable W. Dean Moss, Jr. (via (E-Mail)

## Mash, Lisa R

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**From:** Ball, Nathaniel I CIV USARMY CESAC (US) <Nathaniel.I.Ball@usace.army.mil>  
**Sent:** Wednesday, March 01, 2017 7:52 AM  
**To:** Mash, Lisa R; Smith, Webb T  
**Subject:** FW: GDOT Response to JOT Interagency Meeting and Data GAP Analysis (UNCLASSIFIED)  
**Attachments:** Updated map 1.pdf; SHEP Harbor Document\_04-2015.pdf; Coordination List and Agenda.pdf

CLASSIFICATION: UNCLASSIFIED

FYI

-----Original Message-----

From: BAILEY, William G CIV USARMY CESAS (US)

Sent: Wednesday, March 01, 2017 7:30 AM

To: Ball, Nathaniel I CIV USARMY CESAC (US) <[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_Nathaniel.I.Ball-40usace.army.mil&d=DwlGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=sDCoQ148-ADFla3CXW-aQQ0RZ49aVgmCq-OXB4RzEs4&m=5aRu3LYXuNQ0eyZv\\_s9W9mSIUpCikcNHSUBZz9ttPDI&s=i4D\\_3-I82TDyBBMZPdnKNcFhVFsRgavzXu2iv1QEECM&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__Nathaniel.I.Ball-40usace.army.mil&d=DwlGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=sDCoQ148-ADFla3CXW-aQQ0RZ49aVgmCq-OXB4RzEs4&m=5aRu3LYXuNQ0eyZv_s9W9mSIUpCikcNHSUBZz9ttPDI&s=i4D_3-I82TDyBBMZPdnKNcFhVFsRgavzXu2iv1QEECM&e=)>

Subject: FW: GDOT Response to JOT Interagency Meeting and Data GAP Analysis

-----Original Message-----

From: Morgan-Ryan, Julie A CIV USARMY CESAS (US)

Sent: Wednesday, March 01, 2017 7:12 AM

To: Dayan, Nathan S CIV USARMY CESAS (US) <Nathan.S.Dayan@usace.army.mil>; BAILEY, William G CIV USARMY CESAS (US) <[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_William.G.Bailey-40usace.army.mil&d=DwlGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=sDCoQ148-ADFla3CXW-aQQ0RZ49aVgmCq-OXB4RzEs4&m=5aRu3LYXuNQ0eyZv\\_s9W9mSIUpCikcNHSUBZz9ttPDI&s=-ijpAXbXvs8E2UAYMtLSboIL5ax3uwVVH1jwrLqvxaA&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__William.G.Bailey-40usace.army.mil&d=DwlGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=sDCoQ148-ADFla3CXW-aQQ0RZ49aVgmCq-OXB4RzEs4&m=5aRu3LYXuNQ0eyZv_s9W9mSIUpCikcNHSUBZz9ttPDI&s=-ijpAXbXvs8E2UAYMtLSboIL5ax3uwVVH1jwrLqvxaA&e=)>



Subject: FW: GDOT Response to JOT Interagency Meeting and Data GAP Analysis

FYSA

V/r,

Julie A. Morgan

Archaeologist

US Army Corps of Engineers, Savannah

Phone: 706-856-0378

-----Original Message-----

From: Baughman, Pamela [mailto:pbaughman@dot.ga.gov]

Sent: Tuesday, February 28, 2017 5:05 PM

To: Morgan-Ryan, Julie A CIV USARMY CESAS (US) <[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_Julie.A.Morgan-40usace.army.mil&d=DwlGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=sDCoQ148-ADFla3CXW-aQQ0RZ49aVgmCq-OXB4RzEs4&m=5aRu3LYXuNQ0eyZv\\_s9W9mSIUpCikcNHSUBZz9ttPDI&s=niGyGBjCE8ZNFJNvXuqyEsSgqWUNESMmiWk1Hv7EJU&e=](https://urldefense.proofpoint.com/v2/url?u=http-3A__Julie.A.Morgan-40usace.army.mil&d=DwlGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=sDCoQ148-ADFla3CXW-aQQ0RZ49aVgmCq-OXB4RzEs4&m=5aRu3LYXuNQ0eyZv_s9W9mSIUpCikcNHSUBZz9ttPDI&s=niGyGBjCE8ZNFJNvXuqyEsSgqWUNESMmiWk1Hv7EJU&e=)>

Subject: [EXTERNAL] FW: GDOT Response to JOT Interagency Meeting and Data GAP Analysis

FYI-

Pamela A.J. Baughman

Senior Transportation Archaeologist

(404) 631-1198

pbaughman@dot.ga.gov <mailto:pbaughman@dot.ga.gov>

Georgia Department of Transportation

Office of Environmental Services

One Georgia Center

600 W. Peachtree Street NW, 16th floor

Atlanta, GA 30308

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From: Baughman, Pamela

Sent: Tuesday, February 28, 2017 5:04 PM

To: 'comments@JasperOceanTerminal.com'

Cc: Jackson, Claude R.; Daniell, Ralph; Westberry, Lisa; Mustonen, Heather; Chamblin, Douglas; Lawrence, Sandy

Subject: GDOT Response to JOT Interagency Meeting and Data GAP Analysis

Georgia Department of Transportation (GDOT) Office of Environmental Services (OES) - Cultural Resources has received and reviewed the Public Notice dated January 17, 2017 for the Jasper Ocean Terminal project (P/N SAC 2015-01238) as well as the Data Gaps Analysis dated January 26, 2017.

The following comments regarding Cultural Resources/Data Needs and Technical Investigations are offered for your consideration:

1. GDOT owns a large amount of property within the Savannah Harbor area and has identified several cultural resource properties of concern which should be considered for JOT. An overview of GDOT properties and responsibilities within the Savannah Harbor and surrounding areas is attached to this email. This document focuses on GDOT's interests and cultural resources in particular with respect to the JOT as follows: a. DMCA's in Jasper County, SC; b. Bird/Long Island and Cockspur Island, Chatham County, GA; c. Hutchinson Island, Chatham County, GA; this document was prepared by OES Archaeologist Pamela Baughman for use by the GDOT Intermodal Division. Should you require further details regarding the issues discussed in this document, please contact the author. An updated map showing GDOT property in SC and on Hutchinson Island is attached; GDOT also has GIS layers available for its property along the Atlantic Intracoastal Waterway (AIWW) and at Bird/Long Island and Cockspur Island.
2. A research study involving the University of Georgia and Georgia Tech is currently underway to explore environmental issues and factors affecting management of Bird/Long Island. This project resulted from a stakeholder meeting held in Savannah in July of 2015. The coordination list and agenda for that stakeholder meeting is attached; it is recommended that this list of interested stakeholders be considered as stakeholders for the JOT project. The research study will proceed with fieldwork over the next 18 months and then a management document will be created for GDOT use/application; developments at JOT are an important consideration for GDOT in its management initiatives resulting from this study. JOT is asked to coordinate with GDOT if data or information is desired from these studies being done on GDOT's behalf, and JOT is asked to coordinate information with GDOT resulting from its technical studies leading up to the environmental document for this project, especially with respect to proposed dredging, channel modifications, shipping traffic volumes, and projected impacts such as shoreline erosion.
3. GDOT can provide additional resources such as cultural resource reports, GIS layers, archival source recommendations, as have been identified in the JOT Data Gaps analysis. GDOT has a large staff of cultural resource subject matter experts, including archaeologists and historians, as well as an extensive number of projects that could contribute knowledge and data to the JOT assessments. The References Cited in the attached document includes many resources GDOT can provide.

Comments on Potential Effects:

4. Dredge spoil placement (and cultural resources impacted at these locations) should also be considered part of the activities for the JOT; also, if the JOT causes diminishment of dredge spoil facilities for the Savannah Harbor Expansion Project (SHEP) project and SHEP has to alter its Dredged Material Management Plan (DMMP) to include other areas of impact, JOT should consider this as an indirect effect of its project.

Comments on Coordination:

5. GDOT requests to be considered a Participating Agency for the preparation of the EIS as well as a consulting party under Section 106 of the National Historic Preservation Act. Coordination with respect to this request should be directed to GDOT's Intermodal Division and Office of Environmental Services.

Please direct any correspondence on the JOT project to the individuals copied on this email, and please contact us with any questions regarding these comments.

Thanks,

Pam

Pamela A.J. Baughman

Senior Transportation Archaeologist

(404) 631-1198

pbaughman@dot.ga.gov <mailto:pbaughman@dot.ga.gov>

Georgia Department of Transportation

Office of Environmental Services

One Georgia Center

600 W. Peachtree Street NW, 16th floor

Atlanta, GA 30308

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Pedestrian deaths are surging in Georgia - 206 people were killed while walking in 2015. With pedestrian deaths up 37% in two years, Georgia DOT's SEE & BE SEEN campaign, in partnership with PEDS, aims to make it safer to walk in Georgia. Safety is a shared responsibility. Walkers and drivers: Pay attention. Walkers: make sure you can SEE & BE SEEN. Drivers: Slow down (speed kills). Visit [https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_Blockedwww.dot.ga.gov\\_DS\\_SafetyOperation\\_SBS&d=DwIGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=sDCoQ148-ADFla3CXW-aQQ0RZ49aVgmCq-OXB4RzEs4&m=5aRu3LYXuNQ0eyZv\\_s9W9mSIUpCikcNHSUBZz9ttPDI&s=\\_WH\\_ekCHMrGG3\\_yOMHPh2Uw-\\_ZetzbWHf7WhHQTkajA&e=. #ArriveAliveGA](https://urldefense.proofpoint.com/v2/url?u=http-3A__Blockedwww.dot.ga.gov_DS_SafetyOperation_SBS&d=DwIGaQ&c=cUkzcZGZt-E3UgRE832-4A&r=sDCoQ148-ADFla3CXW-aQQ0RZ49aVgmCq-OXB4RzEs4&m=5aRu3LYXuNQ0eyZv_s9W9mSIUpCikcNHSUBZz9ttPDI&s=_WH_ekCHMrGG3_yOMHPh2Uw-_ZetzbWHf7WhHQTkajA&e=. #ArriveAliveGA)

CLASSIFICATION: UNCLASSIFIED

## **Federal Agency Comment Documents**



**UNITED STATES DEPARTMENT OF COMMERCE**

National Oceanic and Atmospheric Administration

**NATIONAL MARINE FISHERIES SERVICE**

Southeast Regional Office

263 13th Avenue South

St. Petersburg, Florida 33701-5505

<http://sero.nmfs.noaa.gov>

F/SER47:CC/pw

**MAR 01 2017**

Lt. Col. Matthew Luzzatto, Commander  
U.S. Army Corps of Engineers Charleston District  
69A Hagood Avenue  
Charleston, South Carolina 29403-5107

Dear Lt. Colonel Luzzatto:

NOAA's National Marine Fisheries Service (NMFS) reviewed public notice SAC-2015-01238, dated January 17, 2017, announcing a Public Scoping meeting for the proposed Jasper Ocean Terminal (JOT) in Jasper County, South Carolina. The U.S. Army Corps of Engineers (USACE) is preparing an environmental impact statement (EIS) to assess potential social, economic, and environmental effects of the proposed JOT. Under the National Environmental Policy Act, the USACE requested the NMFS provide scoping comments for the EIS. The NMFS provides the following comments and recommendations pursuant to authorities of the Fish and Wildlife Coordination Act, the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act), and the Endangered Species Act (ESA) of 1973. In addition, the NMFS would like to discuss with the USACE the value of the NMFS serving as a cooperating or participating agency during development of the EIS.

*Description of the Proposed Project*

The JOT Joint Venture is considering construction and operation of a marine container terminal on a 1,500-acre site currently serving as a dredged material contaminant area (DMCA) on the South Carolina side of the Savannah River across from Elba Island. Navigation improvements associated with the proposed JOT include new work dredging of berths, an access channel, and a turning basin; shoreline stabilization; bulkheads; and wharf construction. Construction of highways, rail lines, and rail bridges would also be necessary for the JOT. Modifications to the existing Savannah River federal navigation channel may be required.

*Coordination History*

On December 8, 2016, and February 1, 2017, the NMFS and other resource agencies provided the USACE with informal comments outlining environmental issues the USACE should consider when preparing the EIS. The comments below augment those provided during the inter-agency meetings.

*Freshwater/Saltwater Flow*

Creation of berths, an access channel, and a turning basin plus potential modifications to the existing federal navigation channel may alter tidal exchange and currents increasing saltwater intrusion within the Savannah River estuary changing sediment transport, vegetation distributions, and the transport of eggs and larvae of estuarine-dependent organisms throughout the lower portion of the Savannah River. Identification of different salinity zones, maps of





oyster distributions, and updated wetland delineations will be needed to better assess impacts. During the scoping meeting, the USACE indicated the applicant would likely use the Environmental Fluid Dynamics Computer Code to model hydrological flow, water quality, sedimentation, and salinity intrusion. The NMFS recommends the tailoring of this model to examine JOT reflect the latest information used by the USACE to model the effects of the Savannah Harbor Expansion Project (SHEP) on the Savannah River estuary.

#### *Water Quality*

Water quality impacts related to harbor development projects are typically examined with models that focus on the concentrations of dissolved oxygen (DO) and total suspended solids (TSS). The NMFS recommends the USACE work with the resource agencies to identify the locations where direct and indirect impacts to resources would be most detrimental and use those locations to guide the tailoring of the model. It will also be important to understand the impact of combinations of these parameters on eggs and larvae of fish and invertebrates given the proximity of the project to spawning and nursery habitats. For example, low concentrations of DO may slightly impair respiration but the combination of low DO and high concentrations of TSS may cause significant impacts. The USACE may need to sponsor additional studies to further delineate spawning and nursery habitats in the lower Savannah River.

#### *Sediments*

Sediments may have high concentrations of heavy metals and organic contaminants that may be released into the water column when dredging moves or exposes sediments to new chemical environments. The USACE should investigate sediment contaminant loads throughout the proposed dredging area. In particular, the EIS should examine cadmium closely because the DMCA proposed for the JOT will receive cadmium-laden material from the SHEP.

#### *Dredging Windows*

The USACE should investigate whether dredging windows used for SHEP to minimize impacts to larval and young juvenile fish are applicable to the JOT project. Depending on the extent of dredging required for the project, additional studies to describe egg and larval distribution within the lower Savannah River may be needed to better define the dredging window.

#### *Noise Pollution*

The construction and operation of the proposed project would result in an increase in the number and size of cargo vessels entering the Savannah River. The proposed JOT location and downstream areas host spawning aggregations of sciaenid fishes, and these fishes use acoustic signals during spawning. An evaluation of impacts from predicted increases in noise pollution from both vessel traffic and operation of the terminal on spawning aggregations should be conducted.

#### *Benthic Resources*

The proposed navigation modifications may result in the loss of intertidal and subtidal mudflats and their associated benthic communities. The NMFS generally recommends surveys of benthic communities include both the area of impact and a 500-foot buffer around the proposed work areas. The Southeastern Benthic Index of Biotic Integrity (B-IBI) may be useful for assessing the benthic communities in areas proposed for dredging and evaluating long-term changes in the benthic communities resulting from the project.

### *Essential Fish Habitat*

Essential Fish Habitat (EFH) within the greater project area (inclusive of all potential impacts) includes estuarine and marine emergent vegetation, tidal freshwater wetlands, tidal creeks, oyster reefs, intertidal and subtidal mudflats (unconsolidated bottom), and coastal inlets. Many of these habitats foster growth, provide food and protection from predators, and are integral to producing healthy populations of commercially and recreationally important species. The USACE should investigate the distribution (temporally and spatially) of early life stages of fishery species throughout the impact area. In addition, the EFH assessment should focus on effects to salt marshes (including oysters, marsh vegetation, and mud banks) from shoreline armoring, shoreline erosion from increased vessel traffic, and hydrodynamic changes. The required components of an EFH assessment are described at 50 CFR 600.920(e); and may be part of the EIS, an appendix to the EIS, or a separate, stand-alone document. NMFS would be happy to assist the District in preparation of the assessment, and we recommend early coordination on its development.

### *Protected Species and Critical Habitats*

The primary initial impacts of the JOT to threatened and endangered species under the purview of the NMFS will stem from noise impacts and other in-water disturbances associated with construction of the terminal. After construction is completed, increased ship activity and operation of the terminal may result in impacts to migrating and/or foraging Atlantic and shortnose sturgeon. North Atlantic right whales and sea turtles may also be affected by the increased potential for vessel strikes from ships using the proposed facility. The only known calving grounds for endangered North Atlantic right whales lie in nearshore waters of the southeast, including the approaches to the Savannah River, and have been designated as critical habitat for the species. Vessel strikes of right whales are one of the two major threats impacting this species. To assess these potential impacts, the biological assessment for JOT should address the following:

1. Modeling of impacts to Atlantic and shortnose sturgeon habitat to determine the amount of the sturgeon foraging and resting habitat that would be affected by construction of the terminal. Impacts to proposed Atlantic sturgeon critical habitat should also be addressed as designation of this habitat is expected Summer 2017.
2. A noise analysis to assess impacts to ESA-listed species that could result from pile driving/bulkhead construction at the terminal.
3. Best management practices that would be implemented to minimize impacts to protected species/habitats associated with in-water construction activities such as dredging, pile driving, and dredged material/ debris/vegetation removal at the project site.
4. Impacts associated with maintenance dredging, vessel movement to/from/at the terminal, nighttime lighting of terminal, noise associated with loading/offloading of ships, JOT's close proximity to the Elba Island terminal on the opposite riverbank, pollution, low DO concentrations, contaminants, spills, and stormwater runoff, and their potential for harming sturgeon and possibly interrupting spawning migrations.

5. Vessel strike impacts to North Atlantic right whales, and sea turtles (green, loggerhead, Kemp's ridley, and leatherback) from the increased number of ships entering/leaving the Savannah River.
6. Proposals to reduce or offset the impacts of the project on protected species and their critical habitats and an adaptive management plan to monitor and respond to environmental impacts during and post-construction.

The NMFS appreciates the opportunity to provide these comments. Questions regarding EFH may be addressed to Cindy Cooksey. She may be reached at (843) 762-8610 or by e-mail at [Cynthia.Cooksey@noaa.gov](mailto:Cynthia.Cooksey@noaa.gov). Our primary contact for endangered species issues is Kay Davy. She may be reached by phone at (727) 415-9271 or by e-mail at [Kay.Davy@noaa.gov](mailto:Kay.Davy@noaa.gov).

Sincerely,



*for* Roy E. Crabtree, Ph.D.  
Regional Administrator

cc: USACE, Ball  
F/SER, Silverman  
F/SER3, Bernhart, Sweeney, Davy  
F/SER4, Fay, Wilber, Cooksey

**Jasper Ocean Terminal  
Environmental Impact Statement  
US EPA Scoping Comments  
March 1, 2017**

Based on our initial review of the Section 404 project permit public notice and material provided by the USACE during interagency meetings (December 8, 2016 and February 1, 2017), and a public scoping meeting (January 31, 2017), the EPA provides the below scoping comments. We appreciate the opportunity to provide scoping comments on the proposed EIS and look forward to providing technical assistance throughout the EIS process. Should you have questions, feel free to coordinate with Region 4 staff members Jamie Higgins 404-562-9681, [Higgins.jamie@epa.gov](mailto:Higgins.jamie@epa.gov) or Roshanna White at 404-562-9035, [white.roshanna@epa.gov](mailto:white.roshanna@epa.gov).

**Water:**

- Wetlands: The EPA is concerned with the projects estimated 54 acres of wetlands and encourages the USACE to work with EPA, the Joint Venture and other state and federal agencies to identify appropriate avoidance, minimization and mitigation measures.
- Water Quality Standards: The EPA submitted extensive water quality standards comments in an email on 12/21/16. The EPA has no further scoping comments to add.
- Total Maximum Daily Load (TMDL) Dissolved Oxygen Modeling: The EPA is concerned that the proposed project could alter the current hydrodynamics and could potentially impact the Dissolved Oxygen (DO) Total Maximum Daily Load (TMDL). The EPA notes that any impacts to the Savannah Harbor segment would have to be 100% mitigated since all of the allowable 0.1 mg DO deficit has been allocated to dischargers. The EPA understands the USACE intends to collaborate with both the Georgia Department of Environmental Protection Division (GA EPD) and the South Carolina Department of Health and Environmental Control (SC DHEC) and the EPA to determine the most appropriate modeling and impact analysis.
- Stormwater: The EPA is concerned with the potential large amount of impervious surface of a 1500 acres facility. This could lead to potential water quality impacts. The EPA encourages the USACE to work with the Joint Venture to develop sustainable green infrastructure solutions to mitigate any potential impacts to water quality.
- Ground Water: The EPA is concerned regarding potential spills at the proposed project and encourages the USACE to analyze potential measures that would reduce and/or eliminate spills. We also like to know what provisions are being made to contain spills and prevent fluids from moving into the ground water. Also, are there any ground water withdrawals or ground water injections associated with the JOT? Is any ground water monitoring being proposed for the JOT? Are there additional impacts to the Savannah River Channel associated with the JOT? If so, the EPA recommends these impacts be modeled and analyzed to determine the any JOT dredging impacts to the aquifer. Also,

the EPA requests a copy of the 2010 Ground Water report to review so that we can better provide the USACE with technical assistance and recommendations.

- **Ocean Dredged Mater Disposal Site (ODMDS):** The EPA is concerned that the proposed project could impact the current USACE Savannah Harbor ODMDS. With the limited information provided, it is unclear as to what will happen to the dredged material from the 2200' turning basin and berthing area. It is EPA's understanding that the Joint Venture intends to utilize much of the dredge material as fill for the JOT's construction activities. However, the EPA recommends the USACE conduct analysis early in the EIS process to determine the amount of dredge material and the disposal or reuse applications. If it is determined that disposal of the dredge material will be placed in the Savannah Harbor ODMDS, the EPA will need to be engaged early to ensure an expeditious Section 103 Marine Protection Research and Sanctuaries Act process.

**Cadmium-Laden Sediments:** According to the October 21, 2016 Public Notice, the proposed Jasper Ocean Terminal (JOT) would result in the dredging of navigable waters (approximately 439 acres) and potential impacts to wetlands and other waters of the U.S. (approximately 54 acres). The proposed location for the JOT is on top of Dredged Material Containment Areas (DMCAs) 14A and 14B that are being used by the Savannah Harbor Expansion Project (SHEP) for disposal of cadmium-laden dredged materials. If DMCAs 14A and 14B, once completed, will be used for the new terminal, then these DMCAs will no longer be available for future use/expansion. New DMCAs will most likely be necessary to manage the dredged material resulting from construction of the JOT. Presumably some portion of sediments that would require dredging to create the JOT could be cadmium-laden and would require special handling. The Supplemental Environmental Assessment (SEA) for the SHEP was prepared because the U.S. Army Corp of Engineers (USACE) had determined that the technology initially relied upon in the SHEP EIS to manage cadmium-laden dredged materials was infeasible. It is EPA's understanding that the temporary dykes could not be built structurally sound. New alternatives presented in the SEA for managing the cadmium-laden sediments within the DMCA substantially increased the cost of dredged material management. The alternative proposed in the SHEP SEA required mitigation for potential impacts to waterfowl, because the water-level could not be maintained as originally planned. The EPA recommends the USACE refer to our comments regarding on the SHEP SEA when developing the JOT EIS and determining what to do with any cadmium-laden sediment that might be dredged as a result of the JOT. The EPA recommends the criteria for deciding which dredged materials will require special handling for cadmium and other heavy metals should be evaluated in the JOT EIS. Potential threats to a broader array of fish and wildlife species than species of birds that were considered in the EA for the SHEP should be considered. The EPA also recommends the USACE review EPA's comments on the SHEP SEA to determine if any outstanding issues may also pertain to the JOT.

**Air Quality:** The EPA is concerned that there will be increased truck traffic along US Hwy 17 that could elevate CO and PM 2.5 levels. The EPA recommends the USACE consider analyzing potential hot spots for CO and PM 2.5 along the US 17 truck route and other sites located near populated areas. The EPA is also concerned that the Savannah metro area is nearing 85% of the NAAQS and is concerned about this projects potential impacts to the NAAQS. The EPA

recommends the USACE consider evaluating the projects direct, indirect and cumulative impacts associated with NAAQS.

### **Transportation:**

- **Surface Transportation:** The Federal Highway Administration and the South Carolina Department of Transportation submitted an Environmental Assessment to propose the widening and improvements of U.S. 17 (Speedway Boulevard) from I-16 Spur on Hutchinson Island in Savannah, Chatham County, Georgia to South Carolina (S.C.) 315 (South Okatie) Highway. The proposed project proposes to accommodate existing and future traffic volumes. The Joint Venture includes a transportation and utility improvement to construct a 4-lane divided highway between the terminal and U.S. Highway 17. The widening of U.S. 17 from two-lanes to four-lanes supplements the JOT project and considers the increase of traffic that may be caused by the proposed JOT project actions and the operation of JOT when it is completed. The EPA recommends the USACE discuss the cumulative effects that the JOT project has regarding the Federal Highway Administration and the South Carolina Department of Transportation widening and improvements of U.S. 17 project. Additionally, explain the potential extent the JOT project may have in connection with the widening and improvements of the U.S. 17 project.
- **Marine Transportation.** The EPA recommends the USACE closely determine potential operational impacts associated with adding more ships to the navigation channel especially given the Kinder Morgan LNG facility on Elba island. Increased ships within the channel may increase congestion on the river. The EPA encourages the USACE to reach out to Kinder Morgan LNG to solicit their input and concerns regarding the JOT. Additionally, the EPA recommends that their marine operations be considered in modeling and analysis of direct, indirect and cumulative impacts analysis.

**Land Use:** The EPA encourages the USACE to evaluate direct, indirect and cumulative impacts associated with changes in land uses and land development associated with the proposed JOT. Specifically, the EPA thinks induced growth and development should be considered in the cumulative impacts analysis.

**Sustainability:** The EPA encourages the USACE to work with the applicant to design the proposed project in the most environmentally friendly way possible. Since this will be a new terminal, the Joint Venture has an opportunity to design the JOT using the latest sustainable construction techniques. The EPA encourages the USACE and Joint Venture to reach out to other ports that have initiated sustainable efforts. The EPA also encourages the USACE and Joint Venture to consider LEED certifications for their facilities and Green Marine certifications.

**Environmental Justice (EJ) and Community Impacts:** The EPA is concerned with the proposed project's impacts to the surrounding community especially to EJ communities. The EPA recommends the USACE adequately identify EJ communities within the project area and evaluate community and EJ direct, indirect and cumulated impacts associated with increased traffic, noise, vibration, land use and air quality. The EPA is also concerned with the proposed

project's impact to the Gullah Geechee Cultural Heritage Corridor and encourages to the USACE to work with the National Park Service and the Gullah Geechee community to avoid, minimize and mitigate any potential impacts. The EPA also encourages the USACE to outreach and engage the Gullah Geechee community and other EJ communities in a meaningful way to solicit their input.

**Cumulative Impacts:** The EPA is concerned with the Cumulative Impacts associated with the JOT especially when considering the existing GPA terminals, SHEP, the proposed Riverport Project and future induced residential, commercial and industrial growth that will inevitable proceed the construction and operation of the proposed JOT. The EPA encourages the USACE to develop the appropriate geographic scope for evaluating cumulative impacts especially when determining impacts to wetlands, water quality, stormwater impacts, air quality and socioeconomics and EJ communities. It is EPA's understanding that the current Highway 17 corridor is currently very congested and the EPA recommends the USACE not only determine the proposed JOT's direct impacts to Highway 17 and other transportation corridors, but also the cumulative and secondary impacts from induced growth.



## United States Department of the Interior



IN REPLY REFER TO:  
1.A.2. (SERO-PC)

NATIONAL PARK SERVICE  
Southeast Regional Office  
Atlanta Federal Center  
1924 Building  
100 Alabama St., SW.  
Atlanta, Georgia 30303

Lt. Col. Matthew Luzzatto  
Commander  
U.S. Army Corps of Engineers  
Charleston District  
69-A Hagood Avenue  
Charleston, South Carolina 29403

Dear Lt. Col. Luzzatto:

The National Park Service (NPS) formally requests to participate as a Cooperating Agency in the development of the Environmental Impact Statement (EIS) for the proposed Jasper Ocean Terminal project to include all phases of the project which have the potential to affect the Fort Pulaski National Monument (FOPU) in Savannah, Georgia, and NPS operations.

Regulations implementing the procedural provisions of the National Environmental Policy Act of 1969 (NEPA), call for agency cooperation in the NEPA process with the ultimate goal of "...decisions that are based on understanding of environmental consequences, and ... actions that protect, restore, and enhance the environment." 40 C.F.R. §1500.1. The regulations specifically define a cooperating agency as "...any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment." 40 C.F.R. §1508.5.

As a Cooperating Agency, the NPS proposes to assist the U.S. Army Corps of Engineers (USACE) in developing the EIS in order to ensure that pertinent NPS mission statements, legislative authorities, and policies are duly considered when developing any alternatives, related management actions, or options that could potentially affect FOPU. The NPS' cooperating agency status and level of involvement would not preclude our independent review and comment responsibilities under Section 102(2)(C) of NEPA. Similarly, our being a cooperating agency would not imply that the NPS would necessarily concur with all aspects of the USACE's findings.



## General Comments

The NPS Organic Act of 1916 directs the NPS to "...conserve the scenery and the natural and historic objects and wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." NPS is very interested to learn more about how this project may impact historic, marine, wilderness, and other park resources.

This portion of the Savannah River has significant historical and ecological resources that require careful consideration when evaluating this project. Understanding its national significance, President Calvin Coolidge issued a Presidential Proclamation on October 15, 1924, to create FOPU. Initially, the park encompassed approximately 20 acres. However, in 1939 the state of Georgia deeded to the NPS more than 5,000 additional acres. Today the park contains 5,623 acres, including some of the most pristine and scenic marshland on the Georgia coast. Fort Pulaski was added to the National Register of Historic Places (NRHP) in 1975. Contributing historic resources within the park include Battery Horace Hambright, North Pier, Cockspur Island Lighthouse, surface cisterns, Park Residence, the Workmen's village foundations, and the John Wesley Memorial. Over the years the park has become a major draw for regional tourism. In 2015, the NPS recorded an estimated 382,945 visitors, who contributed over \$24 million and 351 jobs to the local economy.

In recognition of its marine resources, FOPU became a National Marine Protected Area (MPA) in 2012. The national system of MPAs, which was created by Executive Order in 2000, "...enhances protection of U.S. marine resources by providing new opportunities for regional and national cooperation, supports the national economy by helping to sustain fisheries and maintaining healthy marine ecosystems for tourism and recreation businesses, and promotes public participation in MPA decision making by improving access to scientific and public policy information." Additionally, the order calls on Federal agencies to "...avoid causing harm to MPAs through federally conducted, approved, or funded activities."<sup>1</sup>

The park has also assessed and determined as a part of its General Management Plan that 4,500 acres of land within FOPU's boundary are eligible as congressionally designated wilderness under the Wilderness Act of 1964.<sup>2</sup> This act provides special protections for lands that "...generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable..."<sup>3</sup> A formal Wilderness Study has been completed and the NPS has proposed that the Department of Interior recommend to Congress that all eligible lands in the park (4,500 acres) be added to the National Wilderness Preservation System.

NPS is concerned about potential impacts of the proposed action to FOPU and requests the following specific resources be addressed in the EIS:

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<sup>1</sup> Executive Order 13158, May 26, 2000

<sup>2</sup> P.L. 88-577

<sup>3</sup> P.L. 88-577 Section 2(c)

## **Natural Sounds and Night Skies**

The NPS is concerned about the potential of the proposed action to adversely affect the acoustic environment and soundscapes at this NPS unit.

Natural and cultural sounds are integral components of the suite of resources and values that NPS managers are charged with preserving and restoring. NPS evaluates Federal actions which may impact the human and natural environment within our parks with respect to our Organic Act mandates, including "...to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations." The "scenery" includes the natural soundscape, as well as the landscape (NPS 2006). NPS Director's Order 47 delegates to the parks the responsibility to preserve natural soundscapes and eliminate or mitigate inappropriate noise sources.

The acoustic environment of a national park, like air, water, or wildlife is a valuable resource that can easily be degraded or destroyed by inappropriate sound levels and frequencies. Intrusive sounds are of concern to the management of national parks because they can impede the ability to accomplish the NPS mission of resource protection. Visitors at many NPS units come with expectations of seeing, hearing, and experiencing phenomena associated with a specific natural or cultural environment, yet in many cases these environments are being increasingly impacted by artificial sounds due to noise associated with commercial operations. NPS recommends that the EIS include an analysis that:

- Determines the natural ambient acoustic condition that exists at FOPU;
- Addresses the cumulative noise output of site operations and increased boat and ship traffic;
- Determines the distance at which noise due to the site operations and increased traffic will attenuate to natural ambient levels;
- Calculates the noise levels at the park boundary in which noise associated with the proposed operations would be above natural ambient levels;
- Assesses the effects that these noise levels would have on wildlife and visitors; and
- Identify appropriate mitigation actions that can reduce or eliminate the impacts on resources at FOPU.

Natural lightscapes are integral to many cultures. Light pollution disrupts these relationships. NPS helps preserve night viewsheds for future generations. The photic environment should be addressed in the EIS as well. Lighting needs, lighting types, lighting impacts, light pollution, and mitigation actions should be addressed for all site operations and increased channel operations.

## **Shoreline Erosion**

NPS requests that the EIS examine the role of increased shipping traffic, as well as increased vessel sizes, in causing shoreline erosion. This is already a serious problem along the north shore of Cockspur Island and at the Cockspur Lighthouse. Since 1958, the Cockspur Lighthouse has been cared for by the NPS as part of FOPU. Over the years, steps have been taken to

maintain the fragile structure on the tip of Cockspur Island. Today, the lighthouse faces serious concerns. Heavy erosion at its base, the constant battering by nature, and advanced shipworm infestation has negatively impacted the lighthouse's structural stability. NPS recommends that the EIS identify the extent to which the proposed project could exacerbate these erosion issues and identify measures to minimize and mitigate any impacts.

In addition to potential impacts to significant cultural resources, increased shoreline erosion would affect the park's natural resources. Increases in the size, frequency, and number of vessels associated with the channel could increase turbidity, alter wetland and coastal habitats, increase land loss, degrade seagrass communities, affect shoreline water flow, and likely affect species distribution and behavior. These changes could alter habitat availability for roosting and foraging shorebirds, affect seagrass use and productivity, and impact fish nurseries.

### **Water Quality**

NPS requests that the EIS assess the impact of construction, maintenance, and operation of the Jasper Ocean Terminal project and its effects on water quality. The NPS is concerned that reductions in water quality may affect both oysters and the species that utilize this habitat as a result of suspended solids, toxins, potential increases in ocean acidification, and other affects.

It is likely that this project would reduce water quality by increasing sediment loading, changing the quantity, patterns of movement, and distribution of salinity, and potentially disturbing and distributing toxins that are currently present in the system or potentially added to the system as a result of this project.

### **Sea Level Rise and Climate Change**

NPS coastal parks contain a wide range of natural resources, cultural resources, and recreational facilities, as well as, infrastructure that provides access to those parks. Much of this infrastructure, such as roads, trails, lighthouses, fortifications, and more helps fulfill the NPS mission, provide heritage education to the public, and preserve important historical landmarks.

Over the next century, warming global temperatures will present many challenges for the NPS and public land managers. Rising sea level will be one of the most obvious and most challenging impacts of this warming. Even a minor increase in sea level will have significant effects on coastal hazards, natural resources, and assets within national parks.

The presence of FOPU along the coast makes this park highly susceptible to the influences of sea level rise and climate change. As such, the EIS must assess how the effects of climate change and anticipated sea level rise when coupled with actions associated with the Jasper Ocean Terminal will affect FOPU. Additionally, this assessment should assess how the proposed action could affect the park's ability to adapt to climate change.

We appreciate this opportunity to comment on the NOI and look forward to becoming a Cooperating Agency and reviewing the Draft EIS. Furthermore, we invite your staff to come visit the park to discuss the project and how the NPS can best aid USACE in addressing our

concerns. Should you have any questions, or need additional information concerning this request, please contact Ms. Melissa Memory, Superintendent, Fort Pulaski National Monument, by calling (912) 786-5787.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Austin". The signature is fluid and cursive, with a large initial "S" and "A".

for Stan Austin  
Regional Director

cc:

USACE - Nat Ball



# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

176 Croghan Spur Road, Suite 200  
Charleston, South Carolina 29407

January 11, 2017

Lt. Colonel Matthew W. Luzzatto  
District Engineer  
U.S. Army Corps of Engineers  
69A Hagood Avenue  
Charleston, SC 29403-5107

Attn: Nathaniel Ball

Re: ER 16/0605, Notice of Intent, Jasper Ocean Terminal, Jasper County, South Carolina  
FWS Log No. 2017-CPA-0006

Dear Mr. Ball:

The U.S. Fish and Wildlife Service (Service) has reviewed the Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the proposed Jasper Ocean Terminal (JOT) on the Savannah River, Jasper County, South Carolina. The JOT Joint Venture, a partnership between the Georgia Ports Authority (GPA) and the South Carolina Ports Authority (SCPA), has submitted a proposal to construct a state-of-the-art marine container terminal in Jasper County, South Carolina. In accordance with the National Environmental Policy Act (NEPA), the NOI has been published in the Federal Register.

The Department of the Army – U.S. Army Corps of Engineers (Department) is seeking comments on the proposed JOT in preparation of an Environmental Impact Statement (EIS). In addition, based on the available information, development of the proposed JOT would result in the dredging of approximately 439 acres of navigable waters and potential impacts to approximately 54 acres of wetlands and other waters of the United States. Therefore, a Department of the Army permit pursuant to Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act will be required. Other Federal and State permits may also be required.

The Service is committed to continued involvement throughout the review and development of the JOT. This project was initiated in 2007 through a joint agreement between the States of Georgia and South Carolina. Since 2008, our personnel have attended previous meetings to preliminarily review the planned JOT and identify and assess its potential impacts upon the surrounding area. Verbal recommendations have been provided to the Department regarding the presence of threatened and endangered (T&E) species or designated critical habitat as well as the

potential secondary and cumulative impacts that may result from the port's development. Specific recommendations included consideration of alternatives to reduce resource impacts, migratory bird conservation, and T&E considerations during in-water activities. To further our coordination we offer the following additional comments relative to potential cumulative impacts that may result from the project.

The Service realizes the JOT design shown in the proposal is preliminary and may change in scope as the project develops. Impacts to vegetated wetland resources have been totaled for the preliminary layout, the majority of which will be due to the rail line and roadway construction. The EIS should consider all alternative alignments and reasonable measures to reduce these impacts. As an example, one alternative would align the proposed rail and road corridors to utilize the existing spoil areas to the maximum extent possible. In addition, we believe the total impacts can be significantly reduced through the elimination of wetland fill for rail and road causeways through the use of trestles and bridging. The preliminary alignment for the rail line crosses into lands the Savannah National Wildlife Refuge (Refuge) and may adversely affect their ability to conduct management activities. The Refuge's primary focus is the management of freshwater impoundments for waterfowl and other migratory birds. We recommend that the Department coordinate closely with the Refuge throughout the life the project. Comments and concerns from the Refuge staff must be incorporated into the JOT EIS.

Other preliminary concerns are listed below, detailed comments on these and other issues will be forthcoming as final plans for the JOT coalesce:

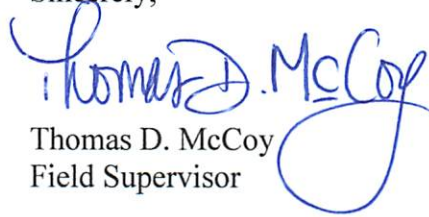
- Lighting impacts to migratory birds, nesting sea turtles, and hatchlings;
- Noise increase and its affect upon resident and transient wildlife;
- Loss of bird foraging and resting areas on spoil areas to be filled;
- Water quality impacts due to port facility runoff;
- Air quality degradation due to port operations;
- Impacts to nearby approved mitigation banks from the proposed rail line;
- Compensatory mitigation for resource impacts; and
- Effects of increased traffic volumes and ancillary widening of U.S. 17 and SC Hwy. 170.

The Service recommends the Department consider species that have been petitioned for listing under the ESA as well as Candidate Species that may be in the project area. These species are collectively referred to as "At-Risk Species" (ARS). We have included a list of ARS that may occur in Jasper County, South Carolina. Although there are no Federal protections afforded to ARS incorporating proactive measures to avoid or minimize harm to ARS may improve their status and assist with precluding the need to list these species. Additional information on ARS can be found at:

<http://www.fws.gov/southeast/candidateconservation>

The Service appreciates the opportunity to provide these comments in this phase of the NEPA process. If you need further clarification regarding these comments, please contact Mr. Mark Caldwell at (843) 727-4707 ext. 215, and reference FWS Log No. 2017-CPA-0006.

Sincerely,

  
Thomas D. McCoy  
Field Supervisor

TDM/MAC

cc: Ms. Joyce Stanley, OEPC, Washington, DC

**Questions to Determine the Surface Transportation Board's Licensing Role:**

- 1. Who would build/construct the proposed rail line(s)?**
- 2. Who would rebuild the abandoned CSX Hutchinson Island Lead?**
- 3. Who would own and control the proposed rail line(s)?**
- 4. Who currently owns the right-of-way for the abandoned CSX Hutchinson Island Lead and who would own the rail line after it is rebuilt?**
- 5. Who would operate the proposed rail line(s)? Would that entity be compensated?**
- 6. Who would operate the Hutchinson Island Lead?**
- 7. Would the operator(s) provide common carrier service over the proposed rail line(s) and over the Hutchinson Island Lead (i.e. provide service to the general public for hire/compensation)?**
- 8. What would the relationship be between the owner(s) and operator(s) or any related entity concerning operations on the proposed rail line(s) and the Hutchinson Island Lead?**
- 9. What if any constraints would be imposed on the operator(s) of the proposed rail line(s) and the Hutchinson Island Lead?**
- 10. Who would perform maintenance on the proposed rail line(s) and the Hutchinson Island Lead?**
- 11. Who would fund maintenance of the proposed rail line(s) and the Hutchinson Island Lead?**
- 12. Who would perform dispatching on the proposed rail line(s) and the Hutchinson Island Lead?**
- 13. Who would be liable for any losses or injury arising from operations on the proposed rail line(s) and Hutchinson Island Lead?**



**Tribal Comment Documents  
(No Comments Received)**

## **Appendix G**

### **Scoping Comments Matrix**

## Summary of Comments Received During the Public Scoping Period for the JOT EIS Project

Issue	Substance of Comments	Approximate Number of Comments
<b>General</b>	<ol style="list-style-type: none"> <li>1) "The family comments at this time are of a general nature and cover two basic areas of concern: 1. The effects on the environment, wildlife, and historic areas during the construction and afterwards; 2. The effects the construction and later usage of the rail lines will have on our property which borders the proposed rail lines. We would like to have a meeting at the appropriate time with the USACE, the two ports authorities, the two railroad companies, Jasper County, and any other parties the USACE deem necessary. Please put us on your docket when the timing is right and keep up informed."</li> <li>2) "We are opposed to additional dredging. Why is dredging separate from Jasper being considered? Is it because 47' will work for the Jasper Ocean Terminal?"</li> <li>3) "Surrounded and impacting in an unknown manner three wildlife refuges, sustainable for this project is an adjective that gives cover to anything. We do not know what this sustainable in the project means, it is a qualification judged by government engineers. The project makes a mockery of the tourism industry of Savannah, Tybee Island and South Carolina Islands; nature and the marshes are a major asset for the region and the project could take them out, not immediately but in the near future. That would include the pollution. People want to live in beautiful places and stable, not an expanding industrial zone. Is it a trade off, willing to gamble with the region [sic]. The land infrastructure, rails and roads and support, involved in the project is not clear and would at least cut through adjacent marshes that feed the wild life refuges. For me the estimated traffic, the high estimate?, [sic] could be absorbed by expanding the Charleston terminals, the structures are there."</li> <li>4) "I'm against this. We do not need this."</li> <li>5) "I worked with the GAU [sic] Dist Corps from 1963 to 1990. I prepared all dredging and disposal area plans &amp; specs for Sav [sic] Dist. and Chatham County (disposal areas). My last 12 years I acted as Contracting Offices Rep. [sic] on all dredging and disposal area contracts. I just want to offer my knowledge to whoever I can on this because there aren't too many of us old fellows around that have been here that long."</li> <li>6) "I know the taxpayers are going to pay for this boondoggle for years to come."</li> <li>7) "Please do not overdevelop!!"</li> <li>8) "It is anticipated that the activities involved in the construction of the JOT will adversely impact the water quality and environment in South Carolina and will thus require, among other things, a Navigable Waters Permit from the South Carolina Savannah River Maritime Commission (Commission) under Regulation 19-450 and other authorization under the Commission's statutory authority. The Commission is responsible for assessing the total impact of the projected activity on the navigable waters and land subject to the jurisdiction of Regulation 19-450, as well as the impact on the economy, environment, and natural resources of South Carolina. . . In addition, the Commission also is tasked with determining whether a projected activity is consistent with the needs and welfare of the public."</li> <li>9) . . . "This site, because it doesn't have any bridges, would not be limited, and could take the 20,000 TEU vessels, and it would be the only port on the Eastern Seaboard that could handle these vessels. I think there is one other thing, I mentioned this because I think it's important to realize that these vessels can't travel through either Charleston or Savannah because they're limited by the height of the bridges. They can't get under the bridges. This, of course, would not be a problem here in Jasper County. . . So this is an opportunity, I hope to [sic] Corps will look at this because I think that this in and of itself is the reason that this port should be built should be permitted and then built, and I think it should as soon as possible because I think it is needed at the present time."</li> <li>10) . . . "It took us 14 years to decide we want to dredge the Savannah River to make it deep enough for these ships. Hopefully, it doesn't take it more than 4 or 5 years to complete this project. But we study, we study, we study. . . "</li> </ol>	<b>10</b>

## Appendix G, cont'd

Issue	Substance of Comments	Approximate Number of Comments
<b>Public Involvement/ Coordination</b>	<ol style="list-style-type: none"> <li>1) "The Gullah/Geechee Sea Island Coalition desires to be an active part to the NEPA process and scoping of the Jasper Ocean Terminal to insure that the rights of Gullah/Geechee people that live near the site of the proposed project are protected and that their quality of life is not negatively impacted due to displacement of their community nor loss of waterway access points. We are the premiere organization that protects the rights of Gullah/Geechees, therefore, we seek to engage with you in the process to insure that the environmental impacts do not have adverse effects on our cultural community."</li> <li>2) "The EPA encourages the USACE to outreach and engage the Gullah Geechee community and other EJ communities in a meaningful way to solicit their input."</li> <li>3) "The Policy Committee of the Lowcountry Area Transportation Study (LATS), which is the designated metropolitan planning organization (MPO), is interested in working closely with the Corps and their associates during the development of the EIS for the JOT."</li> <li>4) "Since 2008, the U.S. Fish and Wildlife Service (USFWS) has attended previous meetings to preliminarily review the planned JOT and identify and assess its potential impacts upon the surrounding area."</li> <li>5) "USFWS recommends that the Corps coordinate closely with the Savannah National Wildlife Refuge (Refuge) throughout the life of the project. Comments and concerns from the Refuge staff must be incorporated into the JOT EIS."</li> <li>6) "Want to thank you for publicizing this meeting, putting this program together to allow our community and our neighbors to come here to learn more about the project and the ramifications it will have both on the environment, economic impact, transportation, and several other issues. . . We appreciate the open line of communication and we look forward to some more events like this and keep the public informed of where this project is and the completion of it."</li> <li>7) "We would like a thorough archeological study performed on the site, and an active conversation with the Yemmasee [sic] and Gullah-Geechee communities as stakeholders in this process, ensuring their interests are represented."</li> </ol>	<b>7</b>
<b>NEPA Process</b>	<ol style="list-style-type: none"> <li>1) "The Corps may not uncritically accept the project proponents' stated need for the Project. Rather, the agency must independently assess forecasted growth in the demand for containerized cargo within the region and whether likely shipping demand can be reasonably accommodated at existing regional ports, including, but not limited to, Charleston, Savannah, and Jacksonville. The Corps should project containerized cargo traffic in the region using detailed data regarding throughput at individual ports, regional manufacturing capacity and output, and other detailed economic data."</li> <li>2) "How will the data from the SHEP EIS and adaptive management monitoring process be used in the JOT EIS analysis? How will the information be updated and incorporated into the dissolved oxygen mitigation, effects on tidally influenced wetlands, and species of concern such as the native striped bass (<i>Morone saxatilis</i>)?"</li> <li>3) "What is the likelihood or timeline for an EIS on additional deepening?"</li> <li>4) "The EPA recommends the USACE review EPA's comments on the SHEP SEA to determine if any outstanding issues may also pertain to the JOT."</li> <li>5) EPA appreciates the opportunity to provide scoping comments on the proposed EIS and looks forward to providing technical assistance throughout the EIS process."</li> <li>6) "NMFS would like to discuss with the USACE the value of NMFS serving as a cooperating or participating agency during development of the EIS."</li> <li>7) "GDOT requests to be considered a Participating Agency for the preparation of the EIS as well as a consulting party under Section 106 of the National Historic Preservation Act. Coordination with respect to this request should be directed to GDOT's Intermodal Division and Office of Environmental Services."</li> <li>8) "The National Park Service (NPS) formally requests to participate as a Cooperating Agency in the development of the EIS for the proposed Jasper Ocean Terminal project to include all phases of the project which have the potential to affect the Fort Pulaski National Monument (FOPU) in Savannah, Georgia, and NPS operations."</li> </ol>	<b>8</b>

**Appendix G, cont'd**

Issue	Substance of Comments	Approximate Number of Comments
<p align="center"><b>Alternatives and Project Design</b></p>	<ol style="list-style-type: none"> <li>1) "The Corps should evaluate alternatives that would meet future demand for containerized cargo through capacity upgrades at existing regional port facilities. The EIS should evaluate alternatives to accommodate Neo-Panamax and Post-Panamax vessels through other regional ports and assess whether regional rail infrastructure upgrades could help increase regional shipping capacity with less environmental impact than the proposed Project. The Corps should also evaluate whether a smaller Terminal that could accommodate fewer vessels would have less impact to the environment and natural resources. The Corps should consider a "No LNG" alternative that assesses whether a smaller Terminal facility could meet projected demand in the absence of conflicts with LNG import and export traffic. The EIS should include an evaluation of alternative routes for the Project's road and rail corridors to identify routes connecting to the existing transportation network infrastructure that minimize environmental impacts, including impacts to wetlands and other critical resources."</li> <li>2) "Has consideration been given to creative use of conservation resources (easements, transfer of density rights, development boundaries, etc.) in the preservation of sensitive habitat and buffering of the site? Compatible use buffers at nearby Fort Stewart and Townsend Bombing Range have served conservation efforts well. This project is across the river from Elba Island facility."</li> <li>3) "The project seems to have a high number of stream and marsh crossings between the roads and rail lines. We demand the least impactful offshoot [sic] infrastructure possible, with an emphasis on retaining the flow and function of the marshes being impacted."</li> <li>4) "A recommended alternative operational approach is to use the electrical linear motor propelled <i>Go Fast</i>™ container transportation system to and from the JOT to the "Hardeeville Intermodal Facility – HIF". The HIF will be located at the convergence of the CSX trunk line, I-95 and Hwy 17 southeast of Hardeeville. The two sites will be connected by an elevated, two-way guideway above the median of the two lane JOT access road to Hwy 17, then continuing along the inactive CSX rail route, or alternatively in the median of the four lane Hwy 17 to the HIF. . . The <i>Go Fast</i> approach using electrical power from the nearby natural gas fired Jasper plant will eliminate the pollution from diesel locomotives and trucks and reduce congestion on Hwy 17, which is a major access road to Savannah. Moving the intermodal facility to the HIF will also reduce the infrastructure cost of filled land on pilings at JOT to accommodate the container stacking and shuttles and will reduce the required berm width for the access to JOT from Hwy 17."</li> <li>5) "Consideration of alternatives to reduce resource impacts, migratory bird conservation, and T&amp;E considerations during in-water activities."</li> <li>6) "The EPA is concerned that the proposed project could impact the current USACE Savannah Harbor ODMDS. With the limited information provided, it is unclear as to what will happen to the dredged material from the 2200' turning basin and berthing area. It is EPA's understanding that the Joint Venture intends to utilize much of the dredge material as fill for the JOT's construction activities. However, the EPA recommends the USACE conduct analysis early in the EIS process to determine the amount of dredge material and the disposal or reuse applications. If it is determined that disposal of the dredge material will be placed in the Savannah Harbor ODMDS, the EPA will need to be engaged early to ensure an expeditious Section 103 Marine Protection Research and Sanctuaries Act process."</li> <li>7) "The EPA encourages the USACE to work with the applicant to design the proposed project in the most environmentally friendly way possible. Since this will be a new terminal, the Joint Venture has an opportunity to design the JOT using the latest sustainable construction techniques. The EPA encourages the USACE and Joint Venture to reach out to other ports that have initiated sustainable efforts. The EPA also encourages the USACE and Joint Venture to consider LEED certifications for their facilities and Green Marine certifications."</li> <li>8) "If the JOT causes diminishment of dredge spoil facilities for the Savannah Harbor Expansion Project (SHEP) project and SHEP has to alter its Dredged Material Management Plan (DMMP) to include other areas of impact, JOT should consider this as an indirect effect of its project."</li> <li>9) "The EIS should consider all alternative alignments and reasonable measures to reduce these impacts. As an example, one alternative would align the proposed rail and road corridors to utilize the existing spoil areas to the maximum extent possible. In addition, we believe the total impacts can be significantly reduced through the elimination of wetland fill for rail and road causeways through the use of trestles and bridging."</li> </ol>	<p align="center">9</p>

## Appendix G, cont'd

Issue	Substance of Comments	Approximate Number of Comments
<b>Socioeconomics and Environmental Justice</b>	<ol style="list-style-type: none"> <li>1) "The EIS should take a close look at the socioeconomic and environmental justice concerns associated with the development of this massive Project in an economically-disadvantaged, rural area. Particular concern should be paid to potential impacts on the cultural integrity of the Gullah Geechee Nation."</li> <li>2) "In what ways will the project benefit the local economy? In what ways will it have economic costs (public, private and ecosystem services)? Will consideration be given to terminal workforce housing and transport?"</li> <li>3) "I'm a resident of Talahi Island, just south of the facility location. I have legitimate concern for my property value and the value of those around me. Other adjacent homes for sale have lost potential buyers as soon as they see the tanks of Elba Island across the marsh from their back yards. I'm concerned this view will be much worse than the tanks of Elba Island. The impact to residential property value must be considered and mitigated for."</li> <li>4) "The EPA is concerned with the proposed project's impacts to the surrounding community especially to EJ communities. The EPA recommends the USACE adequately identify EJ communities within the project area and evaluate community and EJ direct, indirect and cumulated impacts associated with increased traffic, noise, vibration, land use and air quality."</li> <li>5) "I want to emphasize the importance of including a very thorough economic study on what this is really going to do for Jasper County, for the Lowcountry, for our state, and for the entire East Coast."</li> </ol>	<b>5</b>
<b>Land Use and Zoning</b>	<ol style="list-style-type: none"> <li>1) "If project proponents' projections are accurate, the project will radically transform the natural and built environment of rural Jasper County. The EIS should fully evaluate the potential for this Project to spur additional development and sprawl in Jasper County and surroundings [sic], and any associated impacts on land use and zoning."</li> <li>2) "How will the Jasper County Comprehensive Land Use Plan (CLUP) be updated to reflect the conservation, residential, recreational and industrial uses planned around this project? Will a local planning study guide the project related industrial development so it provides more focused economic benefits to Jasper County?"</li> <li>3) "The EPA encourages the USACE to evaluate direct, indirect and cumulative impacts associated with changes in land uses and land development associated with the proposed JOT."</li> </ol>	<b>3</b>
<b>Recreation</b>	<ol style="list-style-type: none"> <li>1) "The EIS should assess impacts on recreational activities, with particular focus on water-borne recreation, including boating, fishing, oyster harvesting, and shrimping, as well as bird-watching at Tybee Island National Wildlife Refuge. These activities face significant risk of impairment as a result of increased container vessel traffic, particularly in light of the increased size of the Neo-Panamax vessels that would call on the Terminal."</li> <li>2) "The NPS is concerned about the potential of the proposed action to adversely affect the acoustic environment and soundscapes at this NPS unit (see also Noise)."</li> <li>3) "East Coast Greenway access would be nice too. ECG is an off road multiuse pathway for peds [sic], cyclists, families, athletes, etc. It is to connect the State of Maine &amp; down East Coast through major cities to Key West, FL. Connect Charleston SC to Savannah GA by bicycles not on roads."</li> </ol>	<b>3</b>

**Appendix G, cont'd**

Issue	Substance of Comments	Approximate Number of Comments
<p align="center"><b>Cultural Resources</b></p>	<ol style="list-style-type: none"> <li>1) "With significant historic resources in the vicinity of the Terminal site and region, an assessment of impacts on historic resources is essential. In addition to identified sites with historical significance related to colonial period, the Revolutionary War, and the Civil War, the EIS should evaluate potential impacts on pre-colonial Native American sites and historic Gullah-Geechee sites."</li> <li>2) "We would like a thorough archeological study performed on the site, and an active conversation with the Yemmasee [sic] and Gullah-Geechee communities as stakeholders in this process, ensuring their interests are represented."</li> <li>3) "... "These waterways and the community where the Jasper Ocean Terminal will be placed are home to the unique Gullah/Geechee culture. Native Gullah/Geechee use the waterways to sustain themselves via fishing traditions. Given that the Gullah/Geechee Cultural Heritage Corridor that runs through the Gullah/Geechee Nation is a federal national heritage area, any potential displacement of Gullah/Geechee peoples' homes, businesses, and historic sites needs to be considered as well as any negative impact to the shoreline and water quality where the terminal will be placed. . . We want to insure that the impacts on the quality of life of the Gullah/Geechee people who are international [sic] recognized as an indigenous cultural group with international human rights is not negative."</li> <li>4) "The EPA is concerned with the proposed project's impact to the Gullah Geechee Cultural Heritage Corridor and encourages the USACE to work with the National Park Service and the Gullah Geechee community to avoid, minimize and mitigate any potential impacts."</li> <li>5) "With respect to the JOT, the following comments regarding Cultural Resources/Data Needs and Technical Investigations are offered for consideration by GDOT:               <ul style="list-style-type: none"> <li>• GDOT owns a large amount of property within the Savannah Harbor area and has identified several cultural resource properties of concern which should be considered for JOT, in particular with respect to: a. DMCAs in Jasper County, SC; b. Bird/Long Island and Cockspar Island, Chatham County, GA; c. Hutchinson Island, Chatham County, GA; this document was prepared by OES Archaeologist Pamela Baughman for use by the GDOT Intermodal Division. Should you require further details regarding the issues discussed in this document, please contact the author.</li> <li>• A research study involving the University of Georgia and Georgia Tech is currently underway to explore environmental issues and factors affecting management of Bird/Long Island. The research study will proceed with fieldwork over the next 18 months and then a management document will be created for GDOT use/application; developments at JOT are an important consideration for GDOT in its management initiatives resulting from this study. JOT is asked to coordinate with GDOT if data or information is desired from these studies being done on GDOT's behalf, and JOT is asked to coordinate information with GDOT resulting from its technical studies leading up to the environmental document for this project. . . "</li> <li>• GDOT can provide additional resources such as cultural resource reports, GIS layers, archival source recommendations, as have been identified in the JOT Data Gaps analysis."</li> </ul> </li> <li>6) "Dredge spoil placement (and cultural resources impacted at these locations) should also be considered part of the activities for the JOT."</li> </ol>	<p align="center"><b>6</b></p>
<p align="center"><b>Public Health and Safety</b></p>	<ol style="list-style-type: none"> <li>1) "There are numerous public health and safety concerns associated with the Project that should be evaluated in the EIS. These include the risk of additional traffic fatalities with increased traffic congestion, as well as emergency response delays caused by such congestion. Air quality and water quality impacts also have significant public health implications, including potential impacts to Savannah's drinking water supply. There are further public risks associated with increased cargo ship traffic in the narrow Savannah Harbor navigation channel and potential conflicts between passing ships as well as with recreational vessels. The proximity of the Elba Island LNG terminal to the Terminal amplifies the magnitude of potential public safety impacts associated with a vessel to vessel collision or other incident and should be considered in a public health and safety risk assessment."</li> </ol>	<p align="center"><b>1</b></p>

**Appendix G, cont'd**

Issue	Substance of Comments	Approximate Number of Comments
<p align="center"><b>Air Quality and Climate Change</b></p>	<ol style="list-style-type: none"> <li>1) "The EIS should assess air quality impacts associated with Terminal operations, as well as vessel, train, and truck traffic to and from the Terminal. The EIS should also project long-term impacts on regional air quality associated with the large-scale development induced by the Project and the projected transformation of rural Jasper County into a hub of global commerce."</li> <li>2) "The EIS should take a hard look at the Project's energy use and greenhouse gas emissions, including any onsite power generation, electrical power usage of all Terminal operations, energy use and emissions from transiting ships, trucks, and trains coming to and from the Terminal, increased emissions from Project-related traffic congestion, and the energy use and emissions from regional industrial, commercial, and residential development induced by the Project."</li> <li>3) "The EPA is concerned that there will be increased truck traffic along US Hwy 17 that could elevate CO and PM<sub>2.5</sub> levels. The EPA recommends the USACE consider analyzing potential hot spots for CO and PM<sub>2.5</sub> along the US 17 truck route and other sites located near populated areas. The EPA is also concerned that the Savannah metro area is nearing 85% of the NAAQS and is concerned about this projects potential impacts to the NAAQS. EPA would like to see similar model runs and analysis as used for the Charleston ICTF project. The EPA recommends the USACE consider evaluating the projects direct, indirect and cumulative impacts associated with NAAQS."</li> <li>4) "Preliminary concerns of the USFWS include air quality degradation due to port operations."</li> <li>5) "The EIS must assess how the effects of climate change and anticipated sea level rise when coupled with actions associated with the Jasper Ocean Terminal will affect FOPU. Additionally, this assessment should assess how the proposed action could affect the park's ability to adapt to climate change."</li> </ol>	<p align="center">5</p>
<p align="center"><b>Noise/Vibration</b></p>	<ol style="list-style-type: none"> <li>1) "The EIS should carefully analyze the impacts of noise and vibration associated with the Project. In addition to construction noise and vibrations (including pile driving activities), the EIS must look at long-term noise and vibration impacts associated with vessel traffic (including engine noise and fog horns), crane container operations (including dropped containers), and train and truck traffic (at the Terminal site, on the new road and railways, and extending onto the existing regional transportation network)."</li> <li>2) "Also of great concern is the noise pollution associated with a facility of this size."</li> <li>3) "The NPS is concerned about the potential of the proposed action to adversely affect the acoustic environment and soundscapes at FOPU. NPS recommends that the EIS include an analysis that: <ul style="list-style-type: none"> <li>• Determines the natural ambient acoustic condition that exists at FOPU;</li> <li>• Addresses the cumulative noise output of site operations and increased boat and ship traffic;</li> <li>• Determines the distance at which noise due to the site operations and increased traffic will attenuate to natural ambient levels;</li> <li>• Calculates the noise levels at the park boundary in which noise associated with the proposed operations would be above natural ambient levels;</li> <li>• Assesses the effects that these noise levels would have on wildlife and visitors; and</li> <li>• Identify appropriate mitigation actions that can reduce or eliminate the impacts on resources at FOPU."</li> </ul> </li> <li>4) "Terminal will have a big impact on my quality of live [sic]. Noise will be 99.9 percent traffic. It will impact the structural [sic] of my home."</li> <li>5) "Also concerned about noise &amp; pollution from trucks &amp; railways."</li> </ol>	<p align="center">5</p>



## Appendix G, cont'd

Issue	Substance of Comments	Approximate Number of Comments
<p style="text-align: center;"><b>Aesthetics/Visual Resources/Lighting</b></p>	<ol style="list-style-type: none"> <li>1) "The EIS should include an assessment of the Project on visual resources and aesthetics, including providing clear visual depictions of the proposed facilities from a variety of nearby vantage points as well as from across the Savannah River."</li> <li>2) "The EIS should evaluate the ways in which light pollution from the Terminal, all road and railway infrastructure, and induced development areas is likely to affect migratory birds, sea turtles, and other species, as well as the human environment, including impacts to the rural character of Jasper County."</li> <li>3) "Light pollution for those living on Richardson Creek and the surrounding areas."</li> <li>4) "Also of great concern is the light pollution associated with a facility of this size."</li> <li>5) "Lighting needs, lighting types, lighting impacts, light pollution, and mitigation actions should be addressed for all site operations and increased channel operations."</li> </ol>	<p><b>5</b></p>
<p style="text-align: center;"><b>Traffic/Transportation</b></p>	<ol style="list-style-type: none"> <li>1) "With seven million TEUs projected to move through the Terminal each year, the local and regional impacts to roadway and railway congestion are likely to be considerable. The EIS should carefully assess the capacity of existing road and rail infrastructure in the region and evaluate whether additional infrastructure will be needed to accommodate this additional road and rail traffic. In addition to freight movement, the traffic impact evaluation should include an assessment of construction-related impacts, impacts from workers traveling to and from the Terminal, and impacts associated with the additional industrial, warehouse, commercial, and residential development likely to be induced by the development of the Terminal. The EIS should include a preliminary cost-estimate of any road and railway improvements needed to accommodate this increased traffic to allow for the public and decision-makers to make an informed cost-benefit assessment regarding the Project."</li> <li>2) "Traffic to and from the site is a huge concern. Construction, rail, and truck traffic will create large amounts of congestion in the area. What improvements will be needed for the Talmadge Bridge to accommodate increased traffic? What will be needed on US 17?"</li> <li>3) "The LCOG's Technical Committee is beginning a review of the LATS Long Range Transportation Plan (LRTP) to incorporate planning for the new transportation system necessary to serve the JOT and supporting growth. LCOG will provide access to their Travel Demand Model with revisions to accommodate port and related vehicle movements along with other data that they have available."</li> <li>4) "The Surface Transportation Board (STB) provided the following list of questions as it relates to the JOT project: <ul style="list-style-type: none"> <li>• Who would build/construct the proposed rail line(s)?</li> <li>• Who would rebuild the abandoned CSX Hutchinson Island Lead?</li> <li>• Who would own and control the proposed rail line(s)?</li> <li>• Who currently owns the right-of-way for the abandoned CSX Hutchinson Island Lead and who would own the rail line after it is rebuilt?</li> <li>• Who would operate the proposed rail line(s)? Would that entity be compensated?</li> <li>• Who would operate the Hutchinson Island Lead?</li> <li>• Would the operator(s) provide common carrier service over the proposed rail line(s) and over the Hutchinson Island Lead (i.e. provide service to the general public for hire/compensation)?</li> <li>• What would the relationship be between the owner(s) and operator(s) or any related entity concerning operations on the proposed rail line(s) and the Hutchinson Island Lead?</li> <li>• What if any constraints would be imposed on the operator(s) of the proposed rail line(s) and the Hutchinson Island Lead?</li> <li>• Who would perform maintenance on the proposed rail line(s) and the Hutchinson Island Lead?</li> <li>• Who would fund maintenance of the proposed rail line(s) and the Hutchinson Island Lead?</li> <li>• Who would perform dispatching on the proposed rail line(s) and the Hutchinson Island Lead?</li> <li>• Who would be liable for any losses or injury arising from operations on the proposed rail line(s) and Hutchinson Island Lead?"</li> </ul> </li> </ol>	<p><b>7</b></p>

## Appendix G, cont'd

Issue	Substance of Comments	Approximate Number of Comments
<b>Traffic/ Transportation, cont'd</b>	<p>5) "Preliminary concerns of the USFWS include effects of increased traffic volumes and ancillary widening of U.S. 17 and SC Hwy. 170."</p> <p>6) "One of my major concerns about this major project is the roadways. And we just recently put a bridge here at the foot of the Savannah Bridge, that should have been four lanes, really, because it's a major congestion [sic] there. It has become a very serious hazard there at the foot of that bridge. And also the 170 Highway, along with 17, needs to be four lanes or three lanes. . ."</p> <p>7) ". . . I want to make sure that the audience knows that not only we need the port, but we need the roads. Right now it's terrible. . . most of the traffic is not Jasper County going to Savannah, it's Beaufort County. . . The port is great, but if you can't get it out and it ties up traffic, it [sic] -- Savannah has the worst problem there is, so we need to make sure that it doesn't happen to us also."</p>	<b>7</b>
<b>Navigation</b>	<p>1) "With expected capacity to simultaneously berth eight Neo-Panamax vessels and move some 7 million TEUs annually, the Terminal will have a significant impact on navigation in the Savannah Harbor. The EIS should closely evaluate impacts on the existing shipping operations of the upriver Garden City Terminal, recreational traffic in the Savannah River, and vessel traffic in the Intracoastal Waterway, including commercial barge operations."</p> <p>2) "The EPA recommends the USACE closely determine potential operational impacts associated with adding more ships to the navigation channel especially given the Kinder Morgan LNG facility on Elba Island. Increased ships within the channel may increase congestion on the river. The EPA encourages the USACE to reach out to Kinder Morgan LNG to solicit their input and concerns regarding the JOT. Additionally, the EPA recommends that their marine operations be considered in modeling and analysis of direct, indirect and cumulative impacts analysis."</p> <p>3) "Will there be a projection of ship traffic flow for this project and the other operations in the Savannah Harbor?"</p>	<b>3</b>
<b>Soil and Sediment Quality</b>	<p>1) "Sediments underlying the Savannah River are known to contain high levels of cadmium and other contaminants. The EIS must consider the impacts associated with disturbing these sediments through dredging activities, as well as the safe disposal of all dredged material."</p> <p>2) "A complete and thorough analysis of the dredged material on which the terminal is being built on, and the potential for contaminants leaking out of the dredge spoils. What are the contaminants of concern and how will they be prevented from getting into the water column?"</p> <p>3) "How is soil instability going to be addressed? This area consists of silty fill deposited over pluff mud. Soil subsidence and very poor load bearing strength will be a continuous issue with this site. Just look at some of the areas in Charleston that were filled years ago and now have buildings with exposed foundations 3 feet higher than existing ground levels. It will costs millions to drive enough piles just to make it somewhat stable."</p> <p>4) "If DMCA 14A and 14B, once completed, will be used for the new terminal, then these DMCA 14As will no longer be available for future use/expansion. New DMCA 14As will most likely be necessary to manage the dredged material resulting from construction of the JOT. Presumably some portion of sediments that would require dredging to create the JOT could be cadmium-laden and would require special handling. The EPA recommends the USACE refer to our comments regarding on the SHEP SEA when developing the JOT EIS and determining what to do with any cadmium-laden sediment that might be dredged as a result of the JOT. The EPA recommends the criteria for deciding which dredged materials will require special handling for cadmium and other heavy metals should be evaluated in the JOT EIS."</p> <p>5) "Sediments may have high concentrations of heavy metals and organic contaminants that may be released into the water column when dredging moves or exposes sediments to new chemical environments. The USACE should investigate sediment contaminant loads throughout the proposed dredging area. In particular, the EIS should examine cadmium closely because the DMCA proposed for the JOT will receive cadmium-laden material from SHEP."</p>	<b>5</b>

## Appendix G, cont'd

Issue	Substance of Comments	Approximate Number of Comments
<b>Water Resources and Stormwater Management</b>	<ol style="list-style-type: none"> <li>1) [Water Quality] "The EIS should take a close look at Project impacts on water resources, including water quality in the Savannah River. The EIS should take a hard look at whether the Project, including associated dredging activities, may exacerbate water quality problems and evaluate the Project's compliance with South Carolina and Georgia state water quality standards, including the anti-degradation standard, as well as the Clean Water Act 404(b) guidelines. The EIS should also assess the water quality impacts associated with increased vessel traffic, including wastewater discharges and the potential introduction of invasive species from ballast water discharges."</li> <li>2) [Stormwater] "An assessment of stormwater runoff should cover the Terminal site, associated new railway and roadway infrastructure, as well as areas of likely induced development."</li> <li>3) [Groundwater] "The EIS should also evaluate the potential impacts on groundwater resources associated with potential dredging activities, including saltwater intrusion into the Floridan aquifer as well as the introduction of other contaminants through a reduction in the depth of the overlying aquitard protecting the aquifer. Impacts to groundwater would affect not only numerous rural well users, but the City of Savannah's water supply. Due to the significance of these resources, the EIS should include a numerical groundwater flow model with salt water intrusion simulation capabilities to rigorously evaluate the potential risk of aquifer contamination."</li> <li>4) [Surface Water] "Will there be changes in flow patterns that alter hydrologic function from project activities? How will rail and roadway access (culverts, bridges, and detention) maintain natural water flow patterns in the SNWR?"</li> <li>5) [Stormwater] "Will a comprehensive stormwater management system that addresses water quality and quantity be developed for JOT? How will stormwater management at the JOT supplement the freshwater areas of the former rice impoundments?"</li> <li>6) [Water Quality] "Will dissolved oxygen monitoring for SHEP be extended beyond the 10-year period, or modified to account for the JOT construction and operational impacts? Will this project require implementing of additional Speece Cone bubblers to sustain appropriate dissolved oxygen levels?"</li> <li>7) [Groundwater] "What will aquifer and groundwater resources be impacts be for this for this project, when considered with SHEP?"</li> <li>8) [Surface Water] "We want a full analysis on the changes of flow expected from Jasper and the adjoining roads, including the effects on adjacent marshlands and riverine bottoms and habitat."</li> <li>9) [Stormwater] "We also want a complete study of the storage and flow changes expected from the vast amounts of stormwater runoff this site will create."</li> <li>10) [Water Quality] "The EPA is concerned that the proposed project could alter the current hydrodynamics and could potentially impact the Dissolved Oxygen (DO) Total Maximum Daily Load (TMDL). The EPA notes that any impacts to the Savannah Harbor segment would have to be 100% mitigated since all of the allowable 0.1 mg DO deficit has been allocated to dischargers. The EPA understands the USACE intends to collaborate with both the Georgia Department of Environmental Protection Division (GA EPD) and the South Carolina Department of Health and Environmental Control (SC DHEC) and the EPA to determine the most appropriate modeling and impact analysis."</li> <li>11) [Stormwater] "The EPA is concerned with the potential large amount of impervious surface of a 1,500 acres facility. This could lead to potential water quality impacts. The EPA encourages the USACE to work with the Joint Venture to develop sustainable green infrastructure solutions to mitigate any potential impacts to water quality."</li> <li>12) [Groundwater] "The EPA would like to know what provisions are being made to contain spills and prevent fluids from moving into the ground water. Also, are there any ground water withdrawals or ground water injections associated with the JOT? Is any ground water monitoring being proposed for the JOT? Are there additional impacts to the Savannah River Channel associated with the JOT? If so, the EPA recommends these impacts be modeled and analyzed to determine the any JOT dredging impacts to the aquifer."</li> </ol>	<b>17</b>

## Appendix G, cont'd

Issue	Substance of Comments	Approximate Number of Comments
<b>Water Resources and Stormwater Management, cont'd</b>	<p>13) "During the scoping meeting, the USACE indicated the applicant would likely use the Environmental Fluid Dynamics Computer Code to model hydrological flow, water quality, sedimentation, and salinity intrusion. The NMFS recommends the tailoring of this model to examine JOT [sic] reflect the latest information used by the USACE to model the effects of the SHEP on the Savannah River estuary."</p> <p>14) "Water quality impacts related to harbor development projects are typically examined with models that focus on the concentrations of DO and TSS. The NMFS recommends the USACE work with the resource agencies to identify the locations where direct and indirect impacts to resources would be most detrimental and use those locations to guide the tailoring of the model."</p> <p>15) "Preliminary concerns of the USFWS include water quality impacts due to port facility runoff."</p> <p>16) "NPS requests that the EIS assess the impact of construction, maintenance, and operation of the Jasper Ocean Terminal project and its effects on water quality. The NPS is concerned that reductions in water quality may affect both oysters and the species that utilize this habitat as a result of suspended solids, toxins, potential increases in ocean acidification, and other affects."</p> <p>17) "How will water pollution and accidental spill contingencies be planned for at the JOT?"</p>	<b>17</b>
<b>Flooding/Sea level Rise/Shoreline Erosion</b>	<p>1) "With the Terminal proposal including the hardening of over two miles of shoreline and negative impacts to many acres of wetlands, the EIS should evaluate the potential for the Project to exacerbate flood hazards, including hazards of hurricane-induced storm surge. This evaluation should take into account projected levels of sea level rise over the next 100 years at least, including an assessment of potential flooding in areas likely to be developed in response to the Terminal."</p> <p>2) "With sea levels projected to rise by up to two meters by the year 2100, the EIS should evaluate the long-term viability of the Terminal under such conditions. The EIS should also assess whether the Terminal, and its more than two miles of hardened shoreline, may contribute to increased shoreline erosion at other areas in the Savannah River Harbor."</p> <p>3) "NPS requests that the EIS examine the role of increased shipping traffic, as well as increased vessel sizes, in causing shoreline erosion. This is already a serious problem along the north shore of Cockscur Island and at the Cockscur Lighthouse. NPS recommends that the EIS identify the extent to which the proposed project could exacerbate these erosion issues and identify measures to minimize and mitigate any impacts. In addition to potential impacts to significant cultural resources, increased shoreline erosion would affect the park's natural resources."</p> <p>4) "The EIS must assess how the effects of climate change and anticipated sea level rise when coupled with actions associated with the Jasper Ocean Terminal will affect FOPU."</p> <p>5) "How will sea level rise considerations be incorporated into the site design?"</p> <p>6) "My greatest concern in the environmental regard is the fact that because all of this has taken this [sic] series of years, beyond a decade, we have seen now king tides, we have seen sea level rise, and we have survived and thrived through several other hurricanes and major storms. So now, how is this project being reevaluated as we go forth in terms of what the future will hold?"</p>	<b>6</b>
<b>Waters of the U.S.</b>	<p>1) "Initial project documents indicate that approximately 439 acres of navigable waters are expected to be dredged, not including potential navigation channel deepening, while about 54 acres of wetlands and other waters of the U.S. also may be impacted by the Project. The EIS should take a close look at these impacts and whether other not-yet identified wetland area may be affected."</p> <p>2) "The EPA is concerned with the projects estimated 54 acres of wetlands and encourages the USACE to work with EPA, the Joint Venture and other state and federal agencies to identify appropriate avoidance, minimization and mitigation measures."</p> <p>3) "How will this project and SHEP impact nearby tidally-influenced freshwater wetlands and marshes? Will salinity levels increase or remain constant with the models used in the SHEP EIS? If upstream salinity increases, what will be the effect on fish assemblages and wetland distribution?"</p>	<b>3</b>

## Appendix G, cont'd

Issue	Substance of Comments	Approximate Number of Comments
<b>Wildlife and Fisheries</b>	<ol style="list-style-type: none"> <li>1) "The EIS should take a comprehensive look at potential impacts to a wide range of fish and wildlife resources. Impacts on the Tybee Island National Wildlife Refuge, the Savannah National Wildlife Refuge, commercial and recreational fisheries, migratory birds, and other species should be closely evaluated."</li> <li>2) "How will dock and construction [sic] and channel alterations affect the spawning habitat of fishes, and will it force utilization of less desirable spawning habitats for fish such as the shortnose sturgeon (<i>Acipenser brevirostrum</i>)?"</li> <li>3) "How will operations related to wildlife management be altered by this project? Will an adaptive management and monitoring plan be developed related to species of concern at SNWR?"</li> <li>4) "It will be important to understand the impact of combinations of water quality parameters (e.g. DO and TSS) on eggs and larvae of fish and invertebrates given the proximity of the project to spawning and nursery habitats. The USACE may need to sponsor additional studies to further delineate spawning and nursery habitats in the lower Savannah River."</li> <li>5) "The USACE should investigate whether dredging windows used for SHEP to minimize impacts to larval and young juvenile fish are applicable to the JOT project. Depending on the extent of dredging required for the project, additional studies to describe eff and larval distribution within the lower Savannah River may be needed to better define the dredging window."</li> <li>6) "An evaluation of impacts from predicted increases in noise pollution from both vessel traffic and operation of the terminal on spawning aggregations of sciaenid fishes, who use acoustic signals during spawning, should be conducted."</li> <li>7) "The proposed navigation modifications may result in the loss of intertidal and subtidal mudflats and their associated benthic communities. The NMFS generally recommends surveys of benthic communities include both the area of impacts and a 500-foot buffer around the proposed work areas."</li> <li>8) "Preliminary concerns of the USFWS include noise increase and its affect upon resident and transient wildlife; and loss of bird foraging and resting areas on spoil areas to be filled."</li> <li>9) "The JOT is a very large project that must be thought of as being at the interface of several functioning ecosystems. The riverine and saltmarsh ecosystems, where the JOT is located, provide a nursery for commercially and recreationally valued species of fish, shellfish, and other wildlife. This area is a valuable ecological and recreation resource."</li> <li>10) "Please preserve the Savannah National Wildlife Refuge &amp; surrounding area. They are important stopping points for migratory birds, etc. "</li> </ol>	<b>10</b>
<b>Threatened and Endangered Species and Migratory Birds</b>	<ol style="list-style-type: none"> <li>1) "The EIS should evaluate the Project's impacts on threatened and endangered species listed under the federal Endangered Species Act, as well as species protected under South Carolina and Georgia state law. This evaluation should, at minimum, cover Shortnose sturgeon and Atlantic sturgeon, manatees, and sea turtles, as well as critically endangered North Atlantic right whale and its critical habitat along the southeastern U.S. coast. . . Increased ship traffic levels are also likely to lead to more vessel strikes and "take" of manatees, sea turtles, and North Atlantic right whales, requiring a Biological Opinion and take permit for the Project."</li> <li>2) "How will this project impact the critical migratory bird habitat located along the rail and roadway corridors that access the main terminal site, and adjoining lands held in conservation easements? How will the terminal operations (e.g. noise, lighting, etc.) address migration patterns, foraging and local nesting areas for threatened and endangered bird species? Potential harm to marine mammals from terminal operations is a critical limiting factor that must be respected. How will the operational and contingency plans for the JOT address fisheries and marine mammal (right whale and manatee) impacts?"</li> <li>3) "Potential effects light pollution could have on nesting and hatching sea turtles on Tybee and the other nearby islands."</li> </ol>	<b>7</b>

**Appendix G, cont'd**

Issue	Substance of Comments	Approximate Number of Comments
<p align="center"><b>Threatened and Endangered Species and Migratory Birds, cont'd</b></p>	<p>4) "The primary initial impacts of the JOT to threatened and endangered species under the purview of NMFS will stem from noise impacts and other in-water disturbances associated with construction of the terminal. After construction is completed, increased vessel ship activity and operation of the terminal may result in impacts to migrating and/or foraging Atlantic and shortnose sturgeon, North Atlantic right whales, and sea turtles. To assess these potential impacts, the biological assessment for JOT should address the following:</p> <ul style="list-style-type: none"> <li>a. Modeling of impacts to Atlantic and shortnose sturgeon habitat to determine the amount of the sturgeon foraging and resting habitat that would be affected by construction of the terminal. Impacts to proposed Atlantic sturgeon critical habitat should also be addressed as designation of this habitat is expected Summer 2017.</li> <li>b. A noise analysis to assess impacts to ESA-listed species that could result from pile driving/bulkhead construction at the terminal.</li> <li>c. Best management practices that would be implemented to minimize impacts to protected species/habitats associated with in-water construction activities such as dredging, pile driving, and dredged material/debris/vegetation removal at the project site.</li> <li>d. Impacts associated with maintenance dredging, vessel movement to/from/at the terminal, nighttime lighting of terminal, noise associated with loading/offloading of ships, JOT's close proximity to the Elba Island terminal on the opposite riverbank, pollution, low DO concentrations, contaminants, spills, and stormwater runoff, and their potential for harming sturgeon and possibly interrupting spawning migrations.</li> <li>e. Vessel strike impacts to North Atlantic right whales and sea turtles (green, loggerhead, Kemp's ridley, and leatherback) from the increased number of ships entering/leaving the Savannah River.</li> <li>f. Proposals to reduce or offset the impacts of the project on protected species and their critical habitats and an adaptive management plan to monitor and respond to environmental impacts during and post-construction."</li> </ul> <p>5) "Preliminary concerns of the USFWS include lighting impacts to migratory birds, nesting sea turtles, and hatchlings.</p> <p>6) "The USFWS recommends the Corps consider species that have been petitioned for listing under the ESA as well as Candidate Species that may be in the project area. These species are collectively referred to as "At-Risk Species" (ARS)."</p> <p>7) "USFWS has provided verbal recommendations to the Corps regarding the presence of threatened and endangered (T&amp;E) species or designated critical habitat as well as the potential secondary and cumulative impacts that may result from the port's development."</p>	<p align="center">7</p>
<p align="center"><b>Essential Fish Habitat (EFH)</b></p>	<p>1) "The USACE should investigate the distribution (temporally and spatially) of early life stages of fishery species throughout the impact area. In addition, the EFH assessment should focus on effects to salt marshes (including oysters, marsh vegetation, and mud banks) from shoreline armoring, shoreline erosion from increased vessel traffic, and hydrodynamic changes. NMFS would be happy to assist the District in preparation of the assessment, and we recommend early coordination on its development."</p>	<p align="center">1</p>
<p align="center"><b>Hazardous, Toxic, and Radioactive Waste (HTRW)</b></p>	<p>1) "The EIS should analyze the safety of any hazardous materials used in Project construction, as well as evaluate any plans for long-term safe disposal of any hazardous waste generated at the Terminal site. Further, the development of the Project will also lead to additional transport of hazardous waste and materials to and from the Terminal, meaning more potential for spills, leaks, and other accidents involving hazardous materials and waste at sea, at the Terminal site, and on regional railways and roadways."</p>	<p align="center">1</p>
<p align="center"><b>Mitigation</b></p>	<p>1) "How are impacted buffers, cleared areas and wetland impacts to be offset with mitigation? Will mitigation be made in the project area (e.g. within seven [7]) miles)? How will floral species of concern be mitigated? What lessons from the Savannah Harbor Expansion (SHEP) project adaptive management process will be used to mitigate environmental impacts on this project? What specific traffic, light, and sound mitigation and operational measures will be taken to protect surrounding properties and wildlife?"</p> <p>2) "How will you make sure the increased truck traffic on US 17, and its accompanying air quality and vibration/weight issues are mitigated?"</p> <p>3) "Preliminary concerns of the USFWS include impacts to nearby approved mitigation banks from the proposed rail line; and compensatory mitigation for resource impacts."</p>	<p align="center">3</p>

### Appendix G, cont'd

Issue	Substance of Comments	Approximate Number of Comments
<b>Cumulative Impacts</b>	<ol style="list-style-type: none"> <li>1) "The EIS also needs to address the cumulative impacts of the Project in conjunction with other reasonably foreseeable port expansion projects throughout the Southeastern region. . . All of these projects will have impacts on regional shipping capacity, contributing to similar impacts on a wide variety of regionally-shared resources, including water quality, fish and wildlife including ESA-listed species, the regional transportation network, wetlands, energy use and greenhouse gases, as well as others. All reasonably-related impacts from these similar proposed projects should be included in the cumulative impacts assessment of the EIS."</li> <li>2) "The cohesive effects of Elba Island and Jasper are not being considered together adequately. They are directly across the river from each other, yet both seem to be moving forward as if in a vacuum. The recent permit issuance from FERC completely failed to look at the potential port despite clear regulatory requirements to consider any foreseeable projects. Jasper is clearly a foreseeable project and was 9 months ago when the permit was issued. Elba states they will have 350 million cubic feet of natural gas a day leaving from their facility. Natural gas ships completely close down the harbor while they are at berth. How is that going to impede Jasper and commercial traffic? What kind of safety issues are being considered for the Jasper Ocean Terminal with large amounts of natural gas stored so close by?"</li> <li>3) "The EPA is concerned with the Cumulative Impacts associated with the JOT especially when considering the existing GPA terminals, SHEP, the proposed Riverport Project and future induced residential, commercial and industrial growth that will inevitable proceed the construction and operation of the proposed JOT."</li> <li>4) "The EPA encourages the USACE to develop the appropriate geographic scope for evaluating cumulative impacts especially when determining impacts to wetlands, water quality, stormwater impacts, air quality and socioeconomic and EJ communities. It is EPA's understanding that the current Highway 17 corridor is currently very congested and the EPA recommends the USACE not only determine the proposed JOT's direct impacts to the widening and improvements of Highway 17 and other transportation corridors, but also the cumulative and secondary impacts from induced growth."</li> <li>5) "The EIS should also assess the cumulative impacts of operating the Terminal in conjunction with the Elba Island LNG terminal, particularly given the security restrictions associated with LNG shipping that could impede other traffic in the Savannah River Harbor when LNG ships are in transit or berthed at Elba Island."</li> </ol>	5