

AD-A152 410

APPLICATION BY CHICAGO BRIDGE & IRON COMPANY FOR PERMIT
TO DREDGE AND CON. (U) CORPS OF ENGINEERS CHARLESTON SC
CHARLESTON DISTRICT NOV 76

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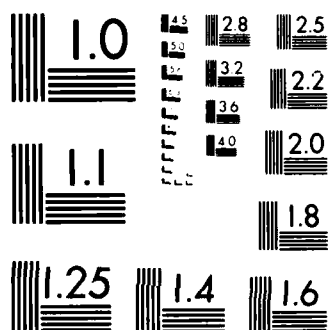
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NATIONAL BUREAU OF STANDARDS-1963-A

FINAL SUPPLEMENT

TO

FINAL ENVIRONMENTAL STATEMENT

AD-A152 410

Application by Chicago Bridge & Iron Company
for Permit to Dredge and Construct a Pier and
Dolphins in the Colleton River at Victoria
Bluff, Beaufort County, South Carolina

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U. S. ARMY ENGINEER DISTRICT, CHARLESTON

November 1976

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This document has been approved
for publication and release in
distribution to be limited.

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APPENDIX A
LETTERS OF COMMENT
AND RESPONSES THERETO
ON THE DRAFT SUPPLEMENT

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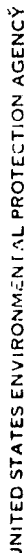
has been approved
and make its
contributions to the field.

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REGION IV
1621 PEACHTREE ST. N.E.
ATLANTA, GEORGIA 30309
December 8, 1975

December 8, 1975

Colonel Harry S. Wilson, USA
District Engineer
Charleston District
Corps of Engineers
P. O. Box 20
Charleston, South Carolina 29405

Dear Colonel Wilson:

Our review of the Supplement to the Final Environmental Impact Statement for the Chicago Bridge and Iron Company raises new questions about the permit application. The deletion of a large portion of Baker area now introduces the possibility that a more environmentally damaging type of industry may develop in the 308 acres remaining in the buffer area. The reason for this modification of the permit is to provide expansion for the Chicago Bridge and Iron chemical fabricating plant, we would have no serious objection if, in return, such assurance is provided since the Supplement allows the future disposition of the 308 acres is not unduly restricted.

With the realization that the future use of this additional acreage would require the need for reduction of the buffer zone, the Chicago Bridge and Eastern Railroad Co. was able to obtain from Chicago Bridge and Eastern Railroad Co. a 100 ft wide strip of the open-ended nature of the buffer zone.

Summary:

John A. Little, Deputy



United States Department of the Interior

FISH AND WILDLIFE SERVICE

P. O. Box 12559

Charleston, South Carolina 29412

September 4, 1975

STATEMENT FOR PUBLIC HEARING CONCERNING THE REVISED APPLICATION BY CHICAGO BRIDGE AND IRON COMPANY FOR DEPARTMENT OF THE ARMY PERMITS TO PERFORM WORK IN THE COLLETON RIVER, BEAUFORT, SOUTH CAROLINA

My name is Curtis A. Laffin. I am the Biologist in Charge of the U. S. Fish and Wildlife Service's Field Office in Charleston, South Carolina, and I represent the U. S. Department of the Interior.

The Fish and Wildlife Service and the Department of the Interior have previously contracted to the Corps of Engineers, operating the contractors by Chicago Bridge and Iron Company for Operation of the Army permits to construct its proposed facility at Victoria Park. We have, in addition, contracted in detail with the State and that service and contractors prepared for this contract. In addition, a contract of the State of the "Supplement to the Final Interim Study" and intended to provide specific and substantial contracts of the department in the near future.

[illegible]

On the basis of the information available, the Department could not determine whether the proposed development would be consistent with the purposes of the Act or the requirements of the Act. Such a determination would have been made to clarify the outstanding uncertainties relating to the future of Victoria Bluff and Port Royal Sound.

We learned with regret that, in its revised permit application, CBI now seeks approval of a plan that would eliminate 308 acres, or approximately 70% of the originally proposed wooded preserve and buffer. This major alteration of the proposed plan is unfortunate. Removal of 308 acres of land from buffer zone status and the corresponding reduction of actual buffer zone from 401 acres to only 93 acres will substantially enhance the potential for future industrialization and cumulative degradation in of Victoria Bluff's rich natural resource environment. Adding to this possibility is the strong suggestion, in the Supplement to the Final Environmental Statement, that CBI may determine to sell its surplus land without imposing any use restrictions on the buyer. Of additional concern is the Supplement's brief but significant reference (page 2) to the possible construction of a railroad to haul metal plates to the proposed facility. The Supplement's matter-of-fact reference to rail transport is not consistent with the Final Environmental Statement's finding that, "a railroad will not be built unless the benefits justify one, and CBI alone will not provide this amount of traffic."

This Department will continue to recommend that no permits be issued for the proposed facility, unless CBI agrees to restore the buffer zone to its original area and to make a legally-binding commitment to ensure preservation of this land in its natural state.

If CBI remains firm in its unwillingness to restrict this use of land outside its project boundaries, we will insist that the Supplement to the Environmental Statement be considerably expanded to fully explore the potential environmental impacts of change in land use designation. We cannot agree with the Supplement's attempt to minimize the effects of selecting 308 acres for the buffer zone. The Supplement's attempt to minimize the effects of the proposed facility is a failure to describe the secondary effects of the proposed facility and the reduction of buffers by CBI. Our comments on the Supplement will address this matter in detail.

The Department will continue to urge the Corps of Engineers to remedy the Final Environmental Statement's inadequate treatment of alternatives to the proposed facility. The Department's comments on the Supplement point out the deficiencies in the Supplement's treatment of only partial

responsive to these comments, devoting a scant seven lines to an explanation of why four of the examined alternative sites were rejected by CBI. In our comments on the Final Statement we renewed our insistence that alternatives be described in sufficient detail to permit meaningful comparisons among them.

To our disappointment, the Supplement to the Final Environmental Statement provided no additional data concerning alternatives. Unless this serious and persistent defect in environmental documents for the CBI permit application is cured, the Department will continue to maintain its objection to permit issuance.

The Department of the Interior has followed with keen interest the proposal to designate Port Royal Sound as a marine sanctuary. We urge the Corps of Engineers to seriously consider whether CBI's proposed designation of land use, and the related potential for additional industrialization at Victoria Bluff would in any way affect the suitability of Port Royal Sound for marine sanctuary status.

In summary, the Department of the Interior's two major objections to issuance of the CBI permit remain unresolved. The determination by CBI to reduce its buffer zone by 308 acres and to retain this land in an unrestricted use status precludes any likelihood of this Department's concurrence in the issuance of the proposed permit for dredging. The continued failure of the Environmental Statement to properly assess alternatives is an additional impediment to removal of our objections. We emphatically hold to our position of record and respectfully urge both the applicant and the Department of the Army to reconsider these important matters.



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

FEB 13 1975

OCT 16 1973

Dear Mr. [Name]:

Enclosed for you are two copies of a letterhead memorandum (LHM) dated and captioned as above. The LHM contains the results of a review of the project and the comments of the Secretary of the Interior.

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application will give full consideration to ensuring any project-related impacts on this potential natural landmark area and in mitigating any adverse impacts which might stem from the permissive action. We further suggest that you explore this issue further with our Regional Director of NPS, located in Atlanta, Georgia.

Specific Comments

Page 1, Paragraph 1

⑥ The discussion in the second paragraph regarding the project area states that the environmental impact of the project is that for the potential project. The word "would" leaves the possibility of future impacts. Comments should be provided in view of the potential impact of both the proposed tract and the adjacent tract. A statement of both the proposed tract and the adjacent tract is required. The statement should be provided in the potential impact of future changes and related development.

Page 3, Paragraph 1

① The statement regarding the secondary effects of the 305-acre tract is incomplete. The statement should state that the secondary effects of the 305-acre tract are that the project area is a potential natural landmark area. The statement should also state that the project area is a potential natural landmark area. The statement should also state that the project area is a potential natural landmark area.

Page 4

① The comment in the first paragraph states that the 305-acre tract is a potential natural landmark area. The comment should state that the 305-acre tract is a potential natural landmark area. The comment should also state that the 305-acre tract is a potential natural landmark area. The comment should also state that the 305-acre tract is a potential natural landmark area.

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PRIORITY: P-1

NAME OF SITE: VICTORIA BLUFF (7-11-11-11-11-11)

ONE-LINE DESCRIPTION: A high-quality marshland forest with a salt marsh habitat. The site is a valuable, scarce ecological associations and opportunities.

THEME/SUBTHEME

CLASSIFICATION: 24, 30, 33/Aa, B, Ca, Ia, Iba, M, Oab, No, Pab
LOCATION: Beaufort County, SOUTH CAROLINA

LATITUDE - LONGITUDE:

USGS QUADRANGLE REFERENCE: Spring Island, 7.5'
Savannah, 1:50,000, S.C., Ga.

SIZE: Victoria Bluff - 20 to 50 acres; (total sound - 42,000 acres)

OWNERSHIP: Water-State; terrestrial portion-various private owners.

ADMINISTERING AGENCY: South Carolina Water Resources Commission

CURRENT LAND USE: Probably hunting and fishing.

DANGERS TO AREA OR VULNERABILITY:

Possible pollution from upstream, forest fires, some grazing and cutting.

SENSITIVITY OF AREA: None

SIGNIFICANCE OF AREA:

Excellent and diverse wildlife (shellfish) habitat, with high deer and squirrel populations. Entire marsh and sound should be considered, not Victoria Bluff is an important timbered area relatively undisturbed in midst of large unpolluted marsh area.

PHYSICAL CHARACTERISTICS:

Sea coast, salt marshes, and islands.

OUTSTANDING GEOLOGICAL FEATURES:

ECOLOGICAL DESCRIPTION:

A pine and hardwood forest stands above tide, with some live large magnolia trees. There is a brackish bog, a freshwater pond and a limited salt marsh area.

7

The above information was obtained from a review of the file and a field visit to the site on 11/11/11. The site is a high-quality marshland forest with a salt marsh habitat. The site is a valuable, scarce ecological associations and opportunities.

Enclosed for your review is a copy of the report on the site visit.

Sincerely yours,



Henry P. Johnson, Secretary of the Interior

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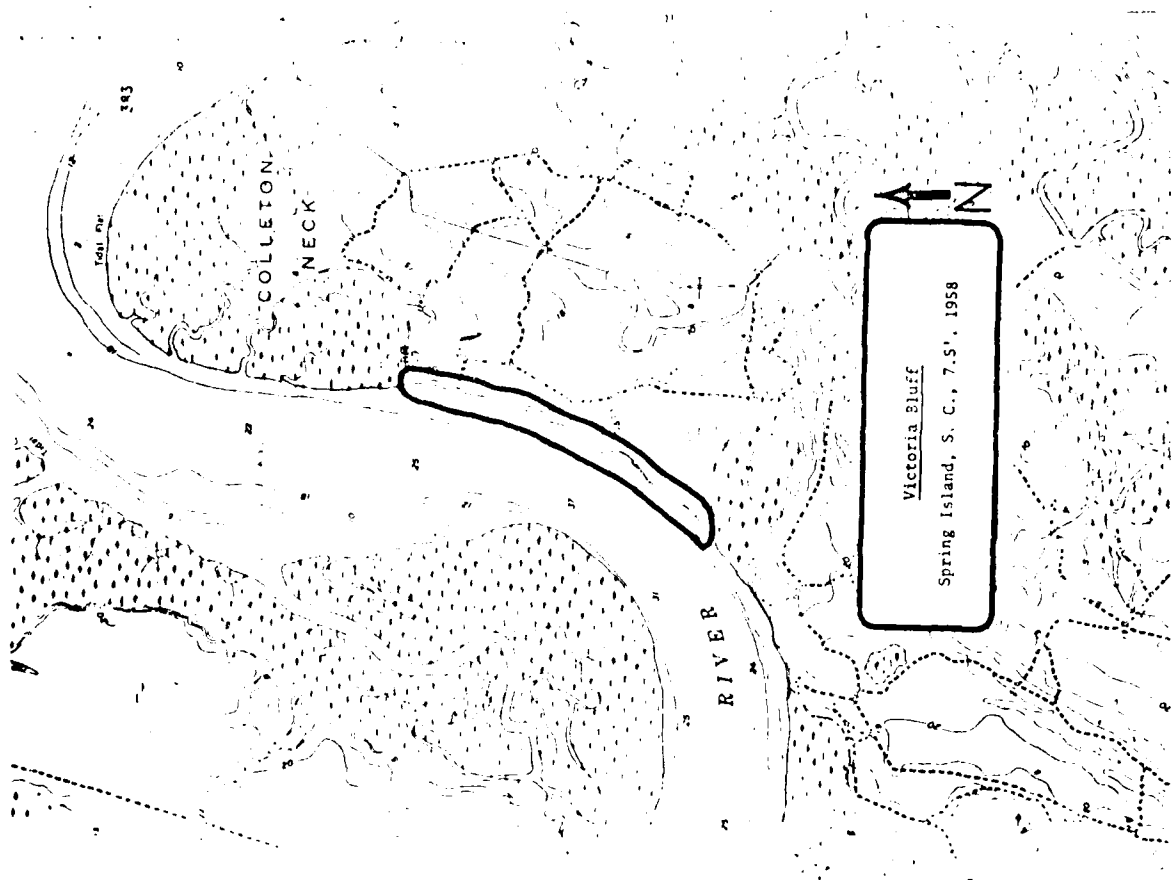
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Gettysburg, Pa. 17330. 1. Brown Pelicans (B. P.)

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Total	478	1010	1400	1400	1400	1400

Map data from U.S. Coast and Geodetic Survey, Chart 1140, 1950.

State of South Carolina
Office of the Governor

JAMES R. EDWARDS
Governor

October 14, 1975

DIVISION OF ADMINISTRATION
Edgar A. Brown Building
Columbia, South Carolina 29201

Colonel Harry S. Wilson, Jr.
District Engineer
Charleston District, Corps of Engineer
Department of the Army
P. O. Box 919
Charleston, South Carolina 29402

Dear Colonel Wilson:

The State Clearinghouse has completed its review of the supplement to the final environmental impact statement for the application for Chicago Bridge & Iron Company, Limited, to construct a new 2600 ft. long bridge with water in the Charleston River at Victoria Bluffs, near the County, South Carolina.

I am enclosing for your information the comment received from the Wildlife and Marine Resources Department, the Department of Archives and History and the State Archives. The comments are that the State Archives request that a archeological study be made. The final environmental impact statement will be that the archeological study be made. The final environmental impact statement will be that the archeological study be made. The final environmental impact statement will be that the archeological study be made.

If there are any questions, please contact me.

Sincerely,

Elmer C. Whitten, Jr.
Elmer C. Whitten, Jr.
State Clearinghouse

EDW:jcs

Enclosures

South Carolina
Project Notification & Review System

PERMITTING DIVISION

Wildlife and Marine Resources
P. O. Box 167
Columbia, SC 29202

RECEIVED

AUG 26 1975

S. C. WILDLIFE & MARINE
RESOURCES DEPARTMENT

Clearinghouse
Use Only
CONTROL NUMBER
DIST. NO. 10
FY 2001
SUSPENSE DATE
9/16

The attached project notification is being referred to your agency in accordance with Office of Management and Budget Circular A-95. This system coordinates the review of proposed federal or federally assisted development programs and projects. Please provide comments below, relating the proposed project to the plans, policies, and programs of your agency. All comments will be reviewed and compiled by the State Clearinghouse. Any questions may be directed to this office by phone at 758-2946. Please return this form prior to the above suspense date to:

State Clearinghouse
Division of Administration
205 Exchange Street
Columbia, South Carolina 29201

Signature *Elmer C. Whitten, Jr.*
Name Elmer C. Whitten, Jr.

RESULTS OF AGENCY REVIEW

- ☒ PROJECT CONSISTENT WITH AGENCY PLANS AND POLICIES
☐ AGENCY REQUESTS CONFERENCE TO DISCUSS COMMENTS
☐ AGENCY COMMENTS ON COMPLETED APPLICATION AS FOLLOWS:

Personnel from the South Carolina Wildlife and Marine Resources Department have reviewed the project and offer no objections.

Elmer C. Whitten, Jr.

DIVISION OF
ADMINISTRATION

FOR THE
STATE
CLEARINGHOUSE

[illegible][illegible]

Program Publication & Review System

[illegible]

SUSPENSE

9/16

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James C. Lusk

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October 9, 1975

5. That the new draft statement address the objections raised by the Council on Environmental Quality to issuance of the permit.

6. And that the new draft statement address the nomination of Port Royal Sound as a marine sanctuary and the status of NOAA's consideration of the sanctuary designation.

I am not requesting that another public hearing be held on this already protracted issue. The Charleston District's approach to a public hearing is apparently ruled by the philosophy that the Federal Government need not tell the public anything at all in the process that the Corps or CBI does not want the public to know. It would like to be boundless to stage another public hearing anyway.

I am not requesting that the statement be revised. I am requesting that the statement be revised to reflect the fact that the Corps and CBI are not boundless to stage another public hearing anyway.

October 9, 1975

entitled "Letters of Comment on Final EIS." That document raises several questions:

1. Why wasn't that document made available for public review with the supplement prior to the September 4 public hearing?
2. Is it the general policy of the Corps, or was it the Charleston District's own decision, to keep responses to comments on the final impact statement from the public, even when -- as in this case -- a supplement to the EIS was deemed necessary and another public hearing was held?
3. What can be done to instill a greater sense of responsiveness and responsibility to the public in the Charleston District office?

Now I want to ask you to consider the fact that the Corps and CBI are not boundless to stage another public hearing anyway.

PUBLIC HEARING STATEMENT
CHARLESTON DISTRICT CORPS OF ENGINEERS

BEAUFORT, SOUTH CAROLINA

Presented by: ORION D. HACK, PRESIDENT
SOUTH CAROLINA ENVIRONMENTAL ACTION, INC.

Subject: SUPPLEMENT TO F.E.I.S.

Charleston District, Corps of Engineers
Beaufort, South Carolina
September 1, 1970
ATTEST: [Signature] [Title]
[Signature] [Title]

Page 10

The Supplement to the Final Environmental Impact Statement (F.E.I.S.) for the proposed Beaufort Harbor and Harbor Entrance Channel Project, Charleston District, Corps of Engineers, Beaufort, South Carolina, is hereby presented for public hearing. The Supplement contains information regarding the proposed project and its effects on the environment. The Supplement also contains information regarding the proposed project and its effects on the environment.

The Supplement to the Final Environmental Impact Statement (F.E.I.S.) for the proposed Beaufort Harbor and Harbor Entrance Channel Project, Charleston District, Corps of Engineers, Beaufort, South Carolina, is hereby presented for public hearing. The Supplement contains information regarding the proposed project and its effects on the environment. The Supplement also contains information regarding the proposed project and its effects on the environment.

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18 SEP 1975

1 NORTH CALBOQUE CAY
HILTON HEAD ISLAND
SOUTH CAROLINA 29928

Sept 14 1975

Harold S. Wilson Jr
Charleston District, Corp & Engineers
P.O. Box 919
Charleston, S.C. 29402

Dear Colonel Wilson Jr

This is a request that you deny the permit for C&I to dredge & construct a pier on the Colleton River, for the following reasons:

- ① 1. The environmental impact study issued by the Dept of Army is inadequate in that it contains a lot of word copy & the E.I.E. made by C&I which in itself is both inaccurate & prejudicial. In other words the Dept of Army never made and E.I.'s they plagiarized one.
- ② 2. C&I reneged on their original agreement to leave a large buffer zone. They now, in their amended application permit, propose to sell a large portion of the buffer zone with no restrictions.

- ③ 3. C&I have deceived the Corps engineers and in contradicts their permit is made. The statement given in their amended study made in the permit is that they will leave a large buffer zone with no restrictions and that they will not dredge or construct a pier on the Colleton River.

④ We are incorporating by reference herein previous comments filed by the Association with respect to the draft environmental impact statement and the final environmental impact statement and we are also incorporating these comments which will be filed with respect to the revised environmental impact statement of the Association's co-counsel, Lunan, Brown, Weinberg & Palmer.

Very truly yours,

John C. Stout, Jr. /cf

John C. Stout, Jr.
Attorney for the Colleton River
Area Landowners Association

JCS:bp

cc: Mary O. Merrick, Co-Chairman CEALA
Marjorie G. Anderson, Co-Chairman CEALA
Frederick L. Miller, Jr., Lunan, Brown, Weinberg & Palmer

9/5/75

-2-

16 SEP 1975

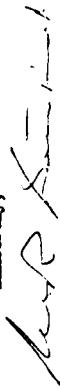
JOHN C. STOUT, JR.
ATTORNEY AT LAW
1400 PULTON NATIONAL BANK BUILDING
ATLANTA, GEORGIA 30303
(404) 581-8800

September 12, 1975

or all of the retail plate products other than LMG containers referred to in the fourth paragraph of your letter of 8/28/75. If such were the case, the facility at Victoria Bluff would for the near future constitute a zero-vert project to help the unemployment situation in this area with, again, little promise in the foreseeable future of providing steady jobs, considering the near-term prospects of unusual activity in the nuclear reactor, coal gasification and offshore drilling fields.

This whole project has assumed such a speculative aspect, as far as actual needs and their fulfillment is concerned, CBI's application merits a very careful further appraisal by the Corps. It is obvious that the remarkable growth in fast economic indicators for Beaufort County over the past several years is attributable to its attractiveness as a resort and recreation area. So, why should the CBI project of doubtful economic need but unadmitted decimation of one of the most attractive natural spots left in the County, be given the benefit of any doubt the Corps might have in its hopefully objective and impartial analysis of the matter.

Sincerely,



W. R. Satterfield

Corps of Engineers
Charleston District
Department of the Army
P. O. Box 919
Charleston, South Carolina 29402

RZ: Revised Final Environmental Impact Statement on
Application of Chicago Bridge and Iron Company - Permit
Application P/N 73-86

Dear Sir:

With regard to the above-referenced application and the public hearing held September 4, 1975, I wish to go on record and on behalf of the Colleton River Area Landowners Association (in addition to the statements made at the hearing by members of the Association) as strenuously objecting to the adequacy of the revision to the final EIS. It appears that all the Corps of Engineers has done is said that there will be an expansion in the number of acres used for the project and that the environmental impact of this is no different than that enumerated in the previous final environmental impact statement. It appears that the Corps of Engineers has in effect pretended that the whole "secondary effects" issue doesn't even exist with respect to the expansion in CBI's plans.

The Corps of Engineers has also failed to consider the effect of the petition now pending with the Commerce Department to designate the Port Royal Sound area including the area surrounding the project as a marine sanctuary. Certainly this application and the impact of the proposed project on marine sanctuary designation cannot be ignored by the Corps.

In summary, I believe that the Corps must address itself to these two principal issues in addition to the other objections we have previously raised before the final environmental impact statement can be complete. The substantial change enumerated in Chicago Bridge and Iron's application requires a complete reassessment of how such a major change affects every issue addressed to date on the project.

①
②

POLYMER LETTERS

[illegible][illegible]

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 3. Objectives
 4. Methodology
 5. Results
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THE SATTERFIELDS
P. O. Box 50
Brenton, S. C. 29902

9/5/75

Charleston District
Corps of Engineers
Department of the Army
Charleston, S.C.

Re: P/N 75-86 (Revise)

Gentlemen:

As a concerned citizen of Jefferson County, I attended the hearing and was deeply disturbed by the testimony of these Communist Party members, and especially by the hearing panel.

Atlanta, Ga., Sept. 10. — The Atlanta Chamber of Commerce has called for a meeting of the business community to discuss the possibility of a new chamber of commerce. The meeting will be held at the Chamber of Commerce building, 100 Peachtree Street, N. E., on Tuesday, Sept. 11, at 2 p. m. The meeting is being called for the purpose of discussing the possibility of a new chamber of commerce, which would be organized to represent the business community of the city. The meeting is being called for the purpose of discussing the possibility of a new chamber of commerce, which would be organized to represent the business community of the city. The meeting is being called for the purpose of discussing the possibility of a new chamber of commerce, which would be organized to represent the business community of the city.

- [illegible]

[illegible]

[illegible]

- 1) The above information is being provided to you for your information only. It is not intended to be used for any other purpose.

2. By what country is the product manufactured?

3. Background

[illegible][illegible][illegible]

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

1. *Phragmites* (Common Reed)

10

Sept. 4, 1975
P.O. Box 275
Bluffton, S.C. 29910

Col. Harry S. Wilson
District Engineer
Corp of Engineers
P.O. Box 919
Charleston, S.C. 29402

Re: Supplement to final EIS
on CSI application.

Dear Colonel Wilson:

Per the notice of public hearing, we are submitting to you our comments on the Supplement to the final EIS for the CSI application. We are submitting these comments in the form of a letter to you, as requested in the notice of public hearing. We are submitting these comments in the form of a letter to you, as requested in the notice of public hearing.

We are submitting these comments in the form of a letter to you, as requested in the notice of public hearing.

1- The Supplement to the final EIS for the CSI application, dated August 1, 1975, contains several changes to the final EIS. We are submitting these comments in the form of a letter to you, as requested in the notice of public hearing.

2- On page 26 of the notice of public hearing, in the third paragraph, it says "The impact on the environment and channel requirements in the river should be the same."

Now to the weasel words- the notice says "In every case, metal plates will be received by rail, truck or barge at the facility. The finished products will be shipped by water to final owners!!!"

POW? by barge?

NO, Sir, you are talking about that CHANNEL to the sea.

Are you saying that we will not have that channelization of the river and that you will have a barge way? We are submitting these comments in the form of a letter to you, as requested in the notice of public hearing.

The Supplement to the final EIS for the CSI application, dated August 1, 1975, contains several changes to the final EIS. We are submitting these comments in the form of a letter to you, as requested in the notice of public hearing.

*Major H. S. Wilson
in the summer of
1975*

NATIONAL AUDUBON SOCIETY

POST OFFICE BOX 32191, ATLANTA, GEORGIA 30323 (404) 253-3712

Statement Presented by the

National Audubon Society

At Court of Appeals for the District of Columbia

Chicago, Illinois, August 1, 1975

Re: CSI

Chicago, Illinois

My name is William H. Wilson, Jr., President of the National

Regional People's Movement. I am submitting this statement to you as requested in the notice of public hearing. I am submitting this statement to you as requested in the notice of public hearing.

In February of this year, the National Audubon Society presented its views on the final report submitted for the proposed CSI project

at a public hearing here in Bluffton. Later in February, the National Audubon Society submitted its views on the proposed CSI project

final report statement. In addition, in February 26, 1975, in a letter to the Secretary of the National Audubon Society, the Charleston District

Engineer requested that the National Audubon Society submit its views on the proposed CSI project

and submit its views on the proposed CSI project

Statement presented by the National Audubon Society

Statement presented by the National Audubon Society

HILTON HEAD PUBLIC SERVICE COUNCIL

Post Office Box 5156

Hilton Head Island, South Carolina 29928

September 4, 1975

Statement made by Charles M. Ackley, Chairman, Public Service Council Hilton Head Island - (coordinating body representing Public Service Districts on Hilton Head Island).

Col. Wilson -

Ladies & Gentlemen -

The concern expressed by me this evening is on behalf of all of the Districts furnishing water for all purposes to most of the 6,600 residents on Hilton Head Island. This same concern must be taken very seriously by other communities such as Bluffton, Barter Landing and the individual farms and Plantations such as Shepperd Hall, and Moss Creek Plantations and others.

Mr. Orion Hack in a letter to Col. Wilson dated 3 March 75 posed the questions of both dredging and pile driving hazards. We all awaited an answer with objective technical information; perhaps putting our fears to rest; in the supplement which we are discussing tonight.

Instead of answering these questions the author of the supplement blithely ignored the right of the people and of public bodies to have satisfactory answers to their questions.

The August supplement shows - a pier or marginal wharf located at the same point and at least 800 feet long. From this it can be assumed that the original plan of a 850 foot wharf is still planned. A line of piling or piling bents this long, resting on or penetrating the cap rock could and probably would create a massive fault or crack in this rock the length of 3 football fields. This cap rock is of a hard dense cherty limestone which is some times phosphatic. According to local knowledge and Professor Colquhoun of USC it is very erratic in occurrence. In the drilling on Spring Island across from Victoria Bluffs the cap rock is entirely absent. In the recent Ladies Island Bridge Pier Construction it was found to be only 12" thick.

The other overcurrent is the Hawthorne formation. This contains secondary aquifers which could easily destroy any skin friction on piling. The soft medium to coarse sands are easy to penetrate and have little bearing. The time waves and tides are sure and difficult to penetrate.

Again quoting Professor Colquhoun, the correlation of the various parts of the Hawthorne formation above proved impossible. At least by the Sonic Methods used to date

We know that at Spring Island the aquifer is 80 feet below MSL at the Colleton Channel it is 64 feet below MSL. Does this slope continue to rise under Victoria Bluff? We have no proof to the contrary.

CBI has made 20 drillings in the area and 15 bore holes were drilled in the Port Royal Sound Study. After the question was raised at the second hearing why weren't the logs included in the supplement or an appendix to it?

In the Seminars I have attended on Preparation of Environments, Impact Statements we were taught that they were to be factual, objective and complete. That questions raised by the public were to be considered and answered.

This supplement and the document it supplements is not complete, not objective and does not answer questions raised to date.

The Ocala aquifer or Santee limestone is the only source of water for the area south of Broad River and Port Royal Sound. It is not a pile of sand as the media has quoted a CBI official.

The people of Beaufort and vicinity used to drink artesian well water from the aquifer, but due to dredging - over pumping - and other factors now drink Savannah River water.

Beaufort, Port Royal, Burton and the military stations near by are served by a canal bearing Savannah River water that cost one million dollars, a treatment plant that cost 1.5 million dollars and a total system which has cost from 6-9 million dollars, today twelve million would be closer.

The people south of the Broad River don't have any 12 million dollars to spare and there are no military stations present to induce the Federal Government to help out with interest free loans.

The dredging has been listed at 27 feet. I can't conceive of an 850 foot wharf and a 27 foot channel in front of it.

However, the piling supporting the wharf whose dead and live load surcharge is unknown and which are shown in drawings in the final EIS as 18' x 18' reinforced concrete piles of unknown length - are one of the main threats to our sole water source - the aquifer.

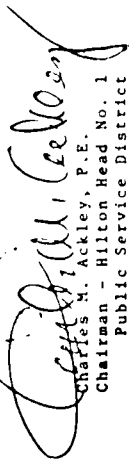
- borings transverse to the axis of flow of the Colleton River in the EIS or its supplement ?
- ② 3. Sound foundation engineering practice demands not only test borings with undisturbed core bored samples taken but test piles driven to load capacities or refusal or both. If the engineers of C.B.I. specify an 18" x 18" reinforced concrete piling of unknown length in the E.I.S. they must have test pile data, or they don't care how much they will damage the aquifer. Why are not the results of test piles driven in the E.I.S. or its supplement ?
4. If test pilings have not been driven and logs of the tests made how did C.B.I. elect to use 18" x 18" reinforced concrete piles ?
- ③ 5. During the hearing Col. Wilson stated that he knew the length of the proposed piles but not the number of them. Why can't the public know both the length and spacing of them ?
- ④ 6. The Savannah Newspaper carried the story of the halting of construction of the water front improvements by Charleston District C. of E. in the City of Beaufort on the Beaufort River because 70 foot piles had been driven which were in excess of the 40 foot piles approved in the permit.
- In the Island Packet of Thursday 18 September there was a story that a similar limitation would be placed by the Charleston District on piling for the C.B.I. construction. Two questions arise from this statement.
- a. Will the limitation be based on a profile of the substrata or just a blanket number of feet of piling ?
- b. Will the types of piling be limited to avoid creating point loading and a subsequent fault in the cap rock, or avoid the need to penetrate the aquifer ?

End of Questions

In view of the fact that the Ocala Aquifer is the sole source of potable water on this island we must again request that until all engineering facts are known and presented with favorable results that permission to construct the wharf and dredge the channel be withheld.

I wish to complement you on your conduct of the Public Hearing on 20 Feb. and was happy to meet you on that occasion.

Sincerely,


Charles M. Ackley, P.E.
Chairman - Hilton Head No. 1
Public Service District
Chairman - Hilton Head Public
Service Council

23 SEP 1975

HILTON HEAD PUBLIC SERVICE COUNCIL

Post Office Box 5156
Hilton Head Island, South Carolina 29928

Col. Harry S. Wilson, Jr.
September 15, 1975
Page Two

researched all aspects of the project. The public has had ample and sufficient time to express their opinion. The United States Corps of Engineers is on firm ground and we submit and respectfully request that this request for a permit for the Chicago Bridge & Iron Company be granted as quickly and expeditiously as possible.

Sincerely,

Edwin W. Fink, Jr.
Edwin W. Fink, Jr.
Chairman

EWJ:ES

September 18, 1975

Subject: Dredging & Wharf Permit Chicago Bridge & Iron Company - Colleton River.

Col Harry S. Wilson, CE, U.S. Army
District Engineer
U.S. Army Engineer District Charleston
Charleston, South Carolina 29405

Dear Col. Wilson:

At the Public Hearing held at the National Guard Armory in Beaufort I presented a paper from the Public Service Council regarding dredging of the aquifer. The aquifer is the sole source of water for Hilton Head Island with a resident population of 10,000 and a tourist population of 100,000. I presented an additional copy of paper to you.

I also wish to remind you that the Public Service Districts are established to provide water, sewerage, and refuse collection and that the committee has been established to carry out this mission. The Public Service Council is a coordinating body to represent all of the districts.

In the question period during the hearing, I did not elect to pose questions since they are of a technical nature and will require further study by the State Army Corps of Engineers and the State of South Carolina.

1. Why did the Corps of Engineers require the Environmental Impact Statement? The Corps of Engineers is required to prepare an EIS for all projects which include dredging, filling, or other major alterations to the waterway. The Corps of Engineers is also required to prepare an EIS for all projects which involve the construction of a new structure or the modification of an existing structure. The Corps of Engineers is also required to prepare an EIS for all projects which involve the discharge of pollutants into the waterway.
2. Keeping in mind the fact that the Corps of Engineers is required to prepare an EIS for all projects which involve the construction of a new structure or the modification of an existing structure, why did the Corps of Engineers require the Environmental Impact Statement for the Chicago Bridge & Iron Company project?

Beaufort County Development Commission

LOCATED IN THE BEAUFORT ARSENAL
713 CRAVEN STREET (803) 524-7418

A-95 Control Number 10-2001-4

CONTINUATION SHEET

Suspense Date 9/16

The Institute requires that, before archeological clearance of the area can be given, an on-the-ground archeological survey of the project area be undertaken. This survey should be done at the earliest possible time in order that its time schedule will not interfere with proposed construction schedules. If sites of importance are located, time must be allowed for mitigation of the adverse effects to them that the project might cause. This may require excavation of the sites or alteration of the project plans to avoid damage to the sites.

The South Carolina Department of Archives and History should be consulted as to the potential locations of historic buildings in the project area.

September 15, 1975

Col. Harry S. Wilson, Jr.
District Engineer
Corps of Engineers
P. O. Box 919
Charleston, SC 29402

RE: 73/86(Revised)

Dear Col. Wilson:

We appreciate the efforts of the Corps of Engineers in providing for the third public hearing for the subject permit request. We feel the Corps has done all possible to allow the public to express themselves on the questions and issues surrounding this project.

From personal observations at the meeting, it is crystal clear that no new evidence relevant to the permit request was presented.

The comments based on the possible damage to the aquifer by piling were entirely unfounded and not supported by any facts.

All references to dredging a channel to the sea were entirely out of order as this is not and has never been a part of the permit request. According to C&GS Chart #1240, the river bottom immediately in front of the area where the request for 27 feet is 31-37 feet deep. The dredging, as you know, is only to accommodate ships moored to the dock at dead low water.

The position of the United States Bureau of Wildlife and Fisheries is, in our opinion, ridiculous. There is no precedent and no valid reason for them to require all of CBI's land to be restricted. This land is no different than the surrounding, adjoining property or the many thousands of acres in the same general vicinity.

Col. Wilson, we deeply regret and offer our sincere apologies that it is necessary for you as District Engineer for the Charleston District to be subjected to the abusive and arrogant remarks of some of those present at the hearing.

The application as submitted by the Chicago Bridge & Iron Company is according to the rules and regulations surrounding the use of water front property in the United States. The Environmental Impact Statement and Supplement there to was carefully, fully and expertly

October 1, 1953

Authority land, not with privately-owned land. That law does not affect land the SPA will retain after the transfer takes place, if ever.

Question 11: Why did the Charleston District so distort the effect of the transfer law?

The "Letters of Comment on Final FIS" document prepared by the Charleston District contains other evasions and distortions that cannot hold up under public scrutiny and questioning. Perhaps that explains why the Charleston office made no attempt to inform the public of the existence of the document or to make it available to the public before the September 4 public hearing.

Question 12: Did CEI prepare any suggested responses to comments on the FEIS for the District office?

Question 13: If CBI did so, may we please have a copy of CBI's suggested responses?

Aside from the evasions and distortions, the document -- and the Charleston District's conduct throughout the CBI case -- raise some fundamental questions about Corps procedures and responsiveness to the public and to meeting the letter and spirit of NEPA's requirements.

Whatever also comes out of the CWI case, I respectfully urge you and the Secretary of the Army to review the Charleston District's handling -- of the misadventure we refer -- of the Civil Rights Administration's case back what never fully and totalization. There are necessary to discuss the case. The Charleston District was the result of a 1967, 1968, 1969, 1970, 1971, 1972, 1973, 1974, 1975, 1976, 1977, 1978, 1979, 1980, 1981, 1982, 1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637,

Question 10: Why this outrageous untruth and distortion?

I regrettably suspect that the Charles E. District's handling of the entire CBI case thus far adds up to a poor way for a public agency to deal with the public.

To conclude, I want to state once again for the record that we believe the draft and final impact statements, and the supplement to the final, are grossly inadequate. They fail to meet requirements set forth by NEPA, the CBA guidelines, and Corps regulations. They have not built the complete record needed for a decision to issue the permit.

On the other hand, and I have still better, to continue to believe that there is abundant evidence for burial of the perils, the nature of a marine sanctuary in Port Royal Sound, and for removal of the United States to an already established area.

October 9, 1975

Issuance of the permit based on the Corps' actions to date and the inadequate record established to date can only lead to further challenge and delay.

With best wishes,

Sincerely, s

Original signed by EJS.

Elvia J. Strahr
President

EJS:SMS
Enclosures: 2

C.c.: Chairman, Council on Environmental Quality
Secretary of the Army
Assistant Secretary
Administrator, Environmental Protection Agency
Administrator, NOAA
Colonel Harry S. Wilson, Jr. ✓

COALITION FOR LOWER BEAUFORT COUNTY

One South Calhoun City

Franklin O. Rouse
Chairman

Hilton Head Island S.C. 29928

October 20, 1975

Phone: (803) 671 2765

Col. Harry S. Wilson, Jr.
District Engineer
Corps of Engineers
P. O. Box 919
Charleston, SC 29402

Re: CBI - Victoria Bluff
Supplement to Final EIS

Dear Col. Wilson:

As many of us stated at the public hearing in Beaufort, South Carolina, 4 September, 1975, we remain amazed at the thinking and almost arrogant stance of the Charleston District Corps of Engineers in the CBI-Victoria Bluff matter. It strikes us that a few staff people there resent the entire environmental assessment process and are out to make a mockery of it -- if not actually scuttle it in this case.

We and others have raised so many important questions that have gone unanswered that it is discouraging to try to work with the Corps. The Charleston office's attempt to limit comments to the slim three and one half page supplement to the FEIS prompts us to state that everything we have said heretofore about this project is to be considered an integral part of our comments on that short supplement.

①

To us, the recent change in plans produced in the entire project by those events touched on in the supplement are major in nature and their obvious consequences. Surely a broadened definition of the products to be manufactured and a deletion of 308 acres from the buffer area creates cause for restudy of the entire case. And it is clear that was the intention of the Assistant Secretary of the Army, The Honorable Victor V. Veysey, when he returned the case to the Charleston District office.

Clearly, the haste and restrictive manner in which the Charleston office has attempted to handle this matter is deplorable. The Coalition for Lower Beaufort County comprises a high percentage of the public residing in the immediate impact area. Try as we have though, we had not got answers or explanations from Charleston on such points as the Corps rebuttal to issues raised by other federal agencies: Commerce, Interior, and CEQ, for example.

Col. Harry S. Wilson, Jr.
October 20, 1975
Page 2

② Will the petition signed by more than 4,000 people seeking a Marine Sanctuary designation for this area be discussed in the final supplement? Will the public have opportunity to review and comment on the Corps' discussion? Are the Corps and a handful of politicians going to determine the destiny of this immediate area? How can we get the public's point of view recognized in the process?

Yours very truly,

Franklin O. Rouse
Franklin O. Rouse
Chairman

FOR:ps

cc: Dr. Elvis Stahr
Hon. Nathaniel P. Reed
Dr. Robert White
Dr. Russell Peterson
Mr. Friedrich Miller, Jr.
Mr. Carlyle Blakeney
Mr. John C. Stout, Jr.
Mr. Orion Hack

COALITION FOR LOWER BEAUFORT COUNTY

One South Calabogie Hwy
Hilton Head Island, SC 29928

Franklin O. Rouse
Chairman

Phone (803) 671-2185

COMMENTS AT PUBLIC HEARING SEPTEMBER 4, 1975

Colonel Wilson, my name is Franklin Rouse. I speak here as Chairman of the Coalition for Lower Beaufort County.

③

The Coordinating Committee of the Coalition is composed of representatives from the respective board of directors of nine major citizens organizations in the area. Their combined membership totals on the order of 5,000 property owners, including many with generations of continuous land ownership in the immediate and general area of Victoria Bluff. As additional evidence of the numerical strength of our Coalition, we have assembled more than 3,800 signatures of people petitioning for a Marine Sanctuary in the Port Royal Sound area.

Recently, according to the press, one of your staff stated: "We don't want to hear about stuff we already heard about for three nights". Because a number of things said at earlier hearings have not been accurately and fully entered on the transcript--even when submitted in writing--we ask your attention, Sir, while I cite an example of a prior statement clearly mis-handled by your staff. We also ask what right does your staff have to edit the transcript of a Public Hearing?

The official "Transcript of Public Hearing Held on Permit Application of Chicago Bridge and Iron Company on 20 February 1975" states on page 11:

"(At the end of Mr. Rouse's statement he had put on display two paintings depicting the artist's conception of what CSI would look like from the river.)" (emphasis added.)

That was correct for the smaller display but Exhibits 4 & 33, and pages 68, 69 and 70 of the transcript itself show that the larger representation was made from ground level at the north end of Hilton Head Island, several miles away from Victoria Bluff and the Colleton River. The larger rendition was the subject of great concern and discussion at the hearing but in the transcript the subject, by omission, was obviously handled in a biased manner by the Corps of Engineers.

EXHIBIT 6

①

In a letter dated June 24, 1977, to Mr. Edwin Gahr, president of the National Audubon Society, the secretary of the Mary Vasey said, in part:

and has reaffirmed their charge in 1935. Inasmuch as the Government does not describe the land use now existing on the tract, it is difficult to determine the primary effect of such a claim. We have no choice but to return the case to the Circuit and to ask that the Government submit an affidavit to the District Attorney. The result of the entire case will take several months to complete."

Olson later, needless to say, we all took the Corps at its word. The implication was clear that a major change in circumstances had occurred and that the CIA needs would either have to be rehabilitated with a completely new HCS, or that a substantial supplement to the existing HCS would have to be returned to assess in detail the major changes in circumstances and to determine how they would be met. Apparently, the latter was the case.

The Corby did submit a new application. That it essentially says is "except what we told you about the buffer area and proceed as if that issue had never been raised." The Corby rescinded, at the District level, by a letter immediately issuing a new notice of public hearing and by releasing a press release stating that HCS which would be favorable if previous issues were not raised.

[illegible]

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

supplemental HC goes on to state:

Channel Engineering is the Colton River and the project is the sewerage plant to be located on the same site. The fabrication of any of the aforementioned products is not a part of the business of the company. Accordingly, all interest awarded in the final EIS to the manufacture of the sewerage plant is also to the manufacture of the sewerage plant and also to the assembly and manufacture of any other final products."

It is amusing that an environmental organization would make an error as such a trifling. For example, to mention the impacts of fabrication and transport, leading to nuclear containment vessels and nuclear reactor vessels, is pretty far-fetched. By the way, there is all another example of the same error factore to recognize pertinent facts in this matter. The project of the "Nuclear Waste" produced at Victoria Baux was actually completed in the Oregon's 1973 Annual Report, brought to the attention of the public, but are just now being incorporated, and are just now being incorporated, in the application and in the application.

On July 19, 1974, HCS stated: "Total plates will be received by rail, and will be delivered to the proposed facility where they will be set to cure, formed and assembled by rolling into completed tanks or other large metal components." Although there is extensive evidence regarding the nature of the railroad's historical tariff pattern submitted for the record, we find the confirmation given in the HCS to the environmental impact of the railroad, as evidenced by the railroad, is a factual consideration that must be redetermined. In so doing, a determination solely on the basis of the railroad's evidence is insufficient. Washington, D.C.: July 19, 1974.

On 11 January 1964, the following information was received from the Bureau of the Census:

Numbered letters in ICC Finance Booklet No. 27398 clearly identify CBI's role for a number of years to its property at Victoria Bluff and otherwise clearly state that: "Fort Victoria is a deepwater site and beyond a shadow of a doubt will become an active port." With such evidence in hand we call upon the Corps of Engineers to discuss fully the impact of a channel, a deepwater port, and in turn channelization of the Colorado River. It will be recalled that CBI was a party to the Navy's study in 1973 and still requires the channel for the future. It is a year mentioned in the revised application.

⑤ Further, in view of official findings contained in the South Carolina "Fort Royal Sound Environmental Study" regarding the aquifer and fresh water supply in this area, we call on the Corps to make available to the public its or hearing study of pile driving planned at Victoria Bluff. Some part of the view of the CBI official who is reported as saying that the nature of the aquifer here is not understood, we prefer to rely on the "Fort Royal Sound Environmental Study" which states that the greatest potential for salt water intrusion into the principal water-bearing zone is found near Victoria Bluff where the low permeability cap is the thinnest. In our view, this hazardous condition should not be treated lightly. Is there not a conflict between the Corps' and the State's studies which should be resolved for the benefit of the public?

⑥ Another question that has dropped from sight: What happened to the Interior Department's call for a hydrologic study of the proposed pier and docking channel stated in Assistant Secretary William A. Vogely's letter to Colonel Robert C. Nelson, dated February 24, 1974?

⑦ Colonel Wilson, a few minutes ago we heard Mr. William J. Stephens testify that the resolution of the CBI Board of Directors contained authority to purchase land but no authorization to build a plant. Under these circumstances are not the Corps of Engineers, other Federal, State and local agencies and many organizations and individuals really dealing with speculative matters? Until the Company officially acts, how can the Corps be sure of what is going to take place at Victoria Bluff? Until the Company knows what its products will be how can it represent to the public the kind and number of jobs it will have in its operations?

⑧ It troubles us that the Corps has seen fit to pick and choose from among CBI's statements in a manner to greatly favor the Company. For example, CBI said for many months that it would build LNG tanks but that it would not otherwise industrialize the area. Why accept those statements in the face of strong evidence to the contrary, for example: The CBI official's statement "The area as we see it in future years will be an industrial area--and that's it." How industrialization of this type can be considered compatible with existing business activities in the area is beyond the comprehension of many knowledgeable people.

We urge the Corps of Engineers to recommend denial of this application as not being in the best interest of the public.

Thank you.

9/4/75

September 3, 1975

District Engineer
Charleston District Corps of Engineers
P. O. Box 919
Charleston, South Carolina 29402

RE: Final EIS, Chicago Bridge and Iron

Gentlemen:

① 1. Water runs off from the very large area of paved surface at the work site parking and should, if possible, be routed through a settling pond - filter bed system prior to discharge into the Colleton River. This will prevent accidental discharge of surface pollutants such as oil and lubricant chips and normal fabrication litter from being washed directly into the river.

② 2. Although the A scale slow response decibel level will be well within the OSHA guidelines, the writer is concerned with the possibility of sharp loud noises of short duration in the mid to higher octave range normally associated with metal forming operations. These impact type noises do not show up on the A scale slow response but could well be a severe nuisance factor to adjacent property owners as well as being extremely unsettling to wildlife. What will be the dBA levels and duration of this type of instantaneous noise?

③ 3. The writer would like a firm commitment from CMI to construct an osprey nesting platform approximately 60 - 70' in height.

④ 4. The writer wishes to emphasize the position originally taken by Ogeechee Audubon with regards to future channel depth requirements between the facility at Victoria Bluff and the open ocean. We are adamantly opposed to any new alterations of the Port Royal Sound estuary for navigation purposes. Any navigation channel improvements between the CMI facility and the ocean would be clearly detrimental to the environment. In order that CMI be made aware of this position at some future date by very strong opposition to re-siting of the facility, we are clearly stating our opposition now.

⑤ 5. Although the writer is not a member of Ogeechee Audubon, we are very concerned for the future of the Port Royal Sound estuary. We are very concerned for the future of the Port Royal Sound estuary. We are very concerned for the future of the Port Royal Sound estuary.

In closing, we would like to urge CMI, in the interest of being a good neighbor, to expand as much as possible the buffer zones between its manufacturing areas and adjacent property owners. The 60' buffer between CMI and the Cram property would be a much more effective barrier if it were increased to 100' or 110' in width.

Very truly yours,

J. L. Stevaar
J. L. Stevaar
Conservation Chairman
Ogeechee Audubon Society

JLS/js

106 Tennessee Drive
Clemson, S.C. 29631
September 3, 1975

Colonel Harry S. Wilson, Jr.
District Engineer
Corps of Engineers
P.O. Box 913
Charleston, S.C. 29402

Dear Colonel Wilson:

I refer to your Notice of Public Hearing, P.N. 73-86 (Revised) 4 August 1975, concerning the application by the Charlemagne Iron Company, Charlemagne Division, to construct a the Charleston River in Beaufort County, South Carolina. I am writing to express my opposition to the construction of the Charlemagne River and the following facts:

There has not been adequate testing of the fresh water supply for this region. As described in your final environmental statement report of this project, the measured water flow from a test well gives a sufficient supply for the anticipated needs of Charlemagne. Many things are lacking in the report. There is no mention of the water purity. As for highly mineralized water of this area suggests (one readily tastes the sulfur content), the velocity of water flow through the aquifer is extremely small because the water bearing strata must have a small hydraulic head are gradient. In turn, the low pressure gradient means that the ability of the aquifer to continue to provide fresh water is questionable. There is an absence of important factors which have the results of the prior test well. I mention how the water table elevation and artesian pressure vary substantially with season, amount of rainfall, and the amount of water in the aquifer. The water table is not stable. The testing information on the water table of what is not weather conditions prevailed there is that an aquifer

when the water demand exceeds the supply, we can expect salt water intrusion into all the water wells. It is your responsibility to protect the water supply.

(2)

On Saturday August 16, 1975, a resident of Beaufort County (George P. Wilson, who lives near the South Carolina Highway 170 circuit (Wilson's Community) went to the Charleston River in a bateau by a small tug boat. 32 bushels of shrimp, during the afternoon, he returned with his wife and daughter and got 11 bushels of crabs. This seafood was for their personal use, and it represents great wealth when one analyzes the per capita income of residence of the coastal area. This example shows the effect of killing the coastal area is financially depressed area. It is in your power to destroy this area of the Charleston River. The Fort Royal Environmental Study made by the State of South Carolina proved by a dysbaric testing of seawater and contamination at the proposed site. The testing of seawater and water there is no influx from other sources. The testing of seawater is excessive. If you claim Charlemagne is the only source of water, then the people who live in the area of the Charlemagne River will be in danger of trash and pollution. The testing of seawater is excessive.

The Charlemagne River is a natural consideration about the Charlemagne River. It is the proper time to ask answers to these questions, you can not turn an artificial element. Thus, the testing of the water supply and seawater is a natural consideration is permissible in this right test case. The necessary considerations for any logical solution.

Sincerely,
P. L. Chaplin
P. L. Chaplin, Ph.D.

ASSISTANT ATTORNEY GENERAL
 DEPARTMENT OF JUSTICE
 WASHINGTON, D.C. 20530

PUBLIC HEARING ON THE PROPOSED L. N. G. - September 4, 1975

My name is William J. Blumers and I am President of the Association of Sea Pines Plantation Property Owners, Incorporated under the laws of the State of South Carolina. I am here to register the concern of more than fifteen hundred individual property owners who are Florida residents. Our Board of Directors voted unanimously in support of this presentation.

FIRST - some general observations.

I have, in my business life, known Chicago Bridge & Iron Company for more than thirty years. They are highly regarded by the construction industry as a great company. They are world-wide contractors and fabricators, incorporated 86 years ago. In the United States they sponsor ten fabricating plants and have a real estate operation. They have other plants throughout the world.

In their Annual Report issued on February 17, 1975, reference is made to their future plans for expanding at Corinth, Alabama, Memphis, Tennessee, Nagasaki in Japan, Kallala in India, Batam Island in Indonesia, Alberta in Canada and the pipeline project in Alaska.

I searched in vain, in this annual report, for any reference to plans concerning Victoria Bluff, South Carolina. I find it strange, if indeed there has been a positive decision to build a plant at Victoria Bluff, when and if a permit is issued, that there is no reference whatsoever made of their intention to do so. In examination of three financial report reviews, made by three members of the New York Stock Exchange this year, I found there was no reference to Victoria Bluff. Normally, one would expect to find, in the Annual Report and in financial reviews, some mention of the intention to build a new plant.

Exhibit 1

Page 1

intentionally, it is in the Federal Register.

I also note that in the introduction of the Board of Directors of CES, there is authority to purchase land, but absent is the authority to build a plant.

Let's look at the record. There was a Public Meeting held here on July 26, 1973. At that time I testified that the latitude and longitude specified in the application located the pier in the middle of the Checheese River, not in the Colleton River as claimed. In the December 1973 Draft Study, page 4, figure 5, it is noted that the derrick remains in the Checheese River. The Final Environmental Study, December 1974, page 7, figure 5, also places the derrick in the Checheese River. I was starting to believe that was where the derrick was going to be placed. I am glad to report the Notice of Public Hearing August 4, 1975 has the derrick in the Colleton River, except the claim is made that this is on the North Shore of the Colleton River, while it is actually on the South Shore.

The Final Environmental Study December 1974 and the Supplement of August 1975 merits attention. The latter states that the proposed facility will primarily manufacture L. N. G. aluminum containers with a proviso that, as business opportunities develop, other products may be, I repeat, may be fabricated.

At the Public Hearing on February 20, 1975, I testified there were 13 ocean going tankers, for the transportation of L. N. G., under contract to the shipyards on the Gulf and East Coast, three at the Avondale Shipyards, New Orleans; seven with General Dynamics, Quincy, Mass.; three with Newport News Shipbuilding, Virginia and two at Sun Shipbuilding. All the L. N. G. tanks required for these ships have been provided for. No new tankers are out for bid. I suspect some of the fifteen tankers now under contract will be cancelled or delivery deferred until early 1980-1981.

The entire program for the transportation of L. N. G. has run into deep trouble. The Federal Government is in a jam here. All right, over the

to import the gas, have been filed, the first one in February 1970. Five years have lapsed since the first plan was filed and only one has won final, unconditional approval as reported by the Wall Street Journal. One has since been withdrawn. The original price of 63 cents, negotiated with the Indonesian Government in September 1973, has now been renegotiated to \$1.25 per million B. T. U's. Algeria, the principal source of gas, has also decided to demand higher prices which are still to be renegotiated. They rescinded the original contract last year. The first of the French-built tankers was delivered to El Paso Gas last month. They have no immediate use for this tanker and the owners state it will be tied up in Hagesund, Norway for an indefinite period. Two more tankers will be delivered by the French next year to El Paso Gas and they also will be idle for some time to come.

Newport News have three tankers under contract with El Paso Gas, two to be delivered next year and one in 1977. Avondale Shipyards have three tankers for delivery to them through 1977. Delivery may have to be extended. Some of these new L. N. G. tankers, which cost \$100 million, face an idle period of varying duration because technical problems have arisen in Algeria. The problem is to chill large volumes of the gas to minus 259 degrees Fahrenheit. There are also problems in the design of the receiving storage tanks in this country. An empty storage tank on Staten Island, N. Y., caught fire last year and killed 43 workers. The Federal Power Commission state the tanks "present many questions of public safety."

What does this all lead up to? The conclusion is clear. It will be many years before another keel is laid down in a United States shipyard for a tanker to transport L. N. G. It will be many years before a shipyard is awarded a new contract for an ocean going tanker that will require the delivery of L. N. G. containers.

It is stated that plans are for L. N. G. to be used in ocean going tankers. The plans are for L. N. G. to be used in ocean going tankers. The plans are for L. N. G. to be used in ocean going tankers.

It is claimed on page 51 of the final E. I. S. that there will be a loss of capacity, to import L. N. G., if the CB&I project does not get final approval. Nothing is further from the facts! The CB&I facility is not needed, and never has been needed, for the importation of L. N. G. To continue to claim justification for the Victoria Bluff facility, on the need for additional capacity to produce L. N. G. containers at this time, is to ignore the realities of today. I fail to understand why the supplement to the final E. I. S. overlooked this factor and allowed the record to stand with the statement that the facility is needed for the importation of L. N. G. and without it there would be a loss of capacity to import L. N. G.

Let the record show that the efforts and policy of the Congress and the Administration are directed to freeing our Country from dependence on imported energy. The progress of time has disclosed, that those who control the gas reserves abroad have taken a page from the O. P. E. C. countries, when it comes to setting the purchase price for their product.

It is to be noted, on page 3 of the letter to the Public Interest, that the Corps has promised that "The final plan will be issued in the form of a draft, and the proposed plan will be subject to public comment." It is further stated that all factors will be considered, including the public interest. It is further stated that I want to ask these questions.

(2)

Is it in the Public Interest, with respect to the economy, to ignore the previous indication that the plant will be built twelve months after the permit is issued, as shown on page 16 of the final E. I. S., and that 40% to 60% persons will be on the job within six months thereafter? We now take note there is now an absence of any timetable for the building of the plant and that initially only 20 to 30 employees will be hired each month and that the 600 employee level will occur in about three to five years, not six months after the plant is built.

(3)

Is it in the Public Interest to ignore the deletion of 300 acres from the buffer zone? The future use of these 300 acres and the 30 acres of killed land, originally to remain in its natural state, is now not constrained in any way. On page 38 of the final E. I. S., it is acknowledged that the impacts of other industry on the local environment are to be considered.

(4)

Is it in the Public Interest to invade the pristine conditions of the Port Royal estuary and start a seaport at Victoria Bluff?

(5)

Is it in the Public Interest to issue the requested permit that will forever compromise the future planning for this area and "set a course for heavy industrialization"? The single-purpose pursuit of a possibly short-term gain can be counter-productive and, as Senator Hollings has written, "in this pursuit, the thoughtful protection of existing or potential benefits, such as wildlife, fisheries and recreation, has too frequently been ignored."

(6)

Is it in the Public Interest to risk the condition of the principal fresh water aquifer, a major source of water for this area? The plan, to build the dock and to support the 1000 ton derrick, requires that 10' diameter piles

will be driven into the water. The nature of these piles and the length of the piles are not discussed in the plan, which is a major omission in the final plan. The architect probably knew why these 4' piles were not made longer. The drawings show, figure 12 page 26, of the final E. I. S., that the confining beds are 30/40 feet below the water surface. The confining beds are 30/40 feet in depth. On the bottom of the beds and on top of the aquifer there is a protective crust. This Ocala aquifer is the principal source of water for this area and damage to the protective crust would be catastrophic to water quality. It is estimated that the 18" square concrete piles would be driven through the confining beds, through the protective crust and deep into the aquifer. It is noted the statement on page 36 claims that dredging to 27 feet below mean low water "is insufficient to have any effect on underlying aquifers" and this may be so. We notice there is no statement made that driving the concrete piles into the aquifer presents no potential risk of damage to the aquifer. If our fresh water is invaded by salt water, does CB&I, Corps of Engineers or the public pay the bill?

(7)

Is it in the Public Interest to develop the potential truck traffic for incoming raw materials and perhaps an outward flow of finished products? Reference is made to the greater auto traffic density on Highway #270 in the periods of time when people are going to and from work. The large potential truck traffic should have been taken into consideration in the evaluation of the impact of this facility.

(8)

Is it in the Public Interest to set up a situation that will continue to cast a shadow over this area. We first had BASI, then Brown & Root. During these unsettled years great uncertainty as to the future use of the area prevailed. If a permit, good for three years, is issued, subject to renewal, the uncertainty continues. The final E. I. S. states that other options that have been proposed for land-use at Victoria Bluff include an institution of higher education, a reservation education center, light industrial plants, an executive plant and a

combination of these aspects, the information action has been taken to implement these proposals. This, no doubt, is because of the uncertainty of future land use and the kind of environment that will exist. This uncertainty should be removed. Any issue a permit for a plant that will primarily manufacture L. H. 2. Links when the future market for them is indeed dismal, if it exists at all. At best, the potential market is in the mid 1980's. Other products, it is stated, may be produced. I again repeat, may be, only as future business opportunities may develop.

I suggest that the competent authorities of the State and County shall, together with a voluntary association of interested business men, set down a program to develop the area in a way that will be compatible with the surroundings, and in a way that will preserve the pristine conditions of the Port Royal estuary and in a way that will produce economic benefits. I believe it can be done, and we'll pull together.

Until such time as the Secretary of the Army has given the public a definitive and analytical answer to the question presented, it would be a serious disservice to the public to ignore the interest of all the people in this area.

1892

—

1909-10-11

[illegible]

addition

①

[illegible]

②

Confidential

I would respectfully like to request that my ^{friend} friends at the previous meeting be reentered into the record at this particular that section of my remarks that deal with the personal economic involvement of some of our elected officials with the State of C.B.I.

Thank you,

Diane S. Martin

Calhoun Plantation

Blacksburg, SC

39910

RESPONSES TO COMMENTS RECEIVED ON THE DRAFT SUPPLEMENT

Environmental Protection Agency

Discussion of the deletion of 308 acres from the permit request is expanded in Section 3 of this supplement.

U. S. Department of Interior

1. Discussion of the deletion of 308 acres from the permit request is expanded in Section 3 of this supplement.
2. Discussion of a possible railroad is expanded in Section 8.5 of this supplement.
3. When CB&I began in 1971 its search for a plant site, its representative contacted port authorities, chambers of commerce, development commissions, and realtors for assistance. Many sites were inspected and rejected for failure to meet one or more of the eight criteria considered essential by CB&I. The seven-line paragraph in Section 5.012 of the final EIS (Section 4 of this supplement) states in effect that CB&I could not find a site meeting its eight criteria for suitability in the vicinity of areas number 2, 6, 7, and 8. Failure of all sites considered in the vicinity of these four areas to meet one or more of eight essential criteria was ascertained without a detailed investigation. Once CB&I determined that a site was unsuitable, it discontinued any further consideration of that site.

An alternative site is considered to be a site which meets the operational requirements of the applicant. In this sense, areas 2, 6, 7, and 8 were not analyzed alternatives because CB&I has stated these four areas would not serve its needs. Therefore, the position of USDI that unsuitable sites be considered as alternative sites, i.e. suitable sites, appears inappropriate. There are in actuality no alternative sites in these four areas which could be discussed and compared with other alternative sites. See also response number 3 to letter of USDI on page B-75.

4. Discussion of a proposed marine sanctuary has been expanded and updated in Section 5 of this supplement.
5. The suggestion that the Corps contact the National Park Service about the national landmark designation was implemented and the information derived from this contact is reflected in the discussion of this issue in Section 6 of this supplement.
6. Discussion of a possible channel is expanded in Section 9 of this supplement.

7. Discussion of the potential for secondary development of adjacent lands is expanded and updated in Section 8 of this supplement.

S. C. Wildlife and Marine Resources

No response is required.

S. C. Department of Archives and History

No response is required.

S. C. State Archaeologist

The responsibility for survey and salvage of archaeological and historical resources at permit areas was delegated to the Secretary of the Interior by Section 4 of the Archaeological and Historic Preservation Act of 1974, Public Law 93-291. The Office of Archaeology and Historic Preservation, National Park Service was given a copy of the letter from the State Archaeologist and asked to perform surveys and salvage of archaeological historical resources as may be warranted by the public interest.

Beaufort County Development Commission

No response is required.

Hilton Head Public Service Council

1. Drilling logs were not contained in the EIS because very few people would have been able to interpret them. Also as is discussed in Section 7 of this supplement, sufficient information was presented in the EIS to indicate that the proposed action would not affect ground water resources.
2. The Corps' concern with piles is only with the environmental impact of their use. As discussed in Section 7 of this supplement, there is no reason to anticipate any adverse environmental impact from the use of piles. Test pile data would be obtained for load bearing purposes and the need for test pile is at the discretion of the structural engineers. Contrary to the assertion in this comment, not all foundation work requires test pile.
3. The spacing of the pile is a design feature which has not yet been determined. CB&I has indicated that detailed plans and specifications will not be done until the permit is issued; nevertheless, as discussed in Section 7 of this supplement, there is no reason to believe piling would adversely affect the underlying aquifer.

4. The District Engineer proposes to condition any permit issued to CB&I, to require the submission and approval of design and construction methods for piling.

5. The effects of dredging and piling on the freshwater aquifer are discussed in Section 7 of this supplement.

6. CB&I's requirement for fresh water is described in Section 1.11 of the final EIS and consists of domestic water for its work force and a one-time withdrawal of water for proof-testing LNG tanks. Ground water resources are discussed in Section 2.07 and the impact of CB&I's projected withdrawals on these resources is discussed in Section 3.11. The information contained in the cited sections of the EIS is sufficient to support a determination that ground water resources are adequate to meet area needs plus the needs of CB&I. The USGS is now studying the ground water resources of this area and the Corps has requested of the Service an evaluation based on their most recent data of the capacity of existing ground water resources to meet existing area demands plus the needs of CB&I. The following letter indicates that the withdrawals proposed by CB&I should not adversely affect ground water resources.



United States Department of the Interior

GEOLOGICAL SURVEY

Box 615

Yemassee, South Carolina 29945

January 26, 1976

Harry S. Wilson, Jr.
Colonel, Corps of Engineers
District Engineer, Charleston District
Post Office Box 919
Charleston, South Carolina 29402

Dear Colonel Wilson:

In reference to your letter of 23 December 1975, the following information is submitted. In the spring of 1970, Layne-Atlantic Company, Inc. drilled one production well and four observation wells, specifically for the purpose of making a quantitative hydraulic appraisal of the primary artesian limestone aquifer (known locally as the Ocala Limestone Formation) underlying Victoria Bluff, South Carolina.

Results of the aquifer test, obtained by Layne-Western, acting as consultant to Layne-Atlantic, indicate that reasonable values of transmissivity and storage are, respectively, 420,000 gpd/ft (gallons per day per foot width of aquifer) and .0002. Using these figures and a constant pumpage rate of 21 gpm (gallons per minute) or about 30,000 gpd (gallons per day), Exhibit 1 was constructed. As can be seen from Exhibit 1, the effects of the proposed pumpage of 12,000 to 30,000 gpd at Victoria Bluff would be negligible at Hilton Head Island. For example, after pumping at a rate of 30,000 gpd for 100,000 days, the drawdown at a distance of 20,000 feet generated by this pumpage would be only 0.07 foot.

Exhibit 1 is based on the unlikely assumption that there is no leakage of water through the confining bed to replace the water removed by pumpage, that no recharge or discharge barriers are encountered, that natural recharge and discharge are unchanged, and that the aquifer is isotropic and homogeneous. If there were leakage or a recharge barrier, the drawdown, as indicated in Exhibit 1, would be less and at some distance from the pumped well and at some point in time would be zero. As possible evidence for leakage it should be noted that although ground-water withdrawals have increased rapidly at Hilton Head Island during the past few years (estimated average daily withdrawal is 15-20 million gpd), the average yearly potentiometric surface

Harry S. Wilson, Jr.
Post Office Box 219
Charleston, S. C. 29402
January 26, 1976

Page 2

at the proposed CBI site, Victoria Bluff and at Palmetto Dunes, Hilton Head Island does not show any significant downward trend for the 1974 and 1975 water years (Exhibit 2). Also, numerous water level measurements made at different locations on Hilton Head Island indicate that the average potentiometric surface has not declined any significant amount in the past two years.

Sincerely yours,

Larry R. Hayes

Larry R. Hayes
Hydrologist

LRH:aj
Enclosures

Distance from Pumped Well (ft.)

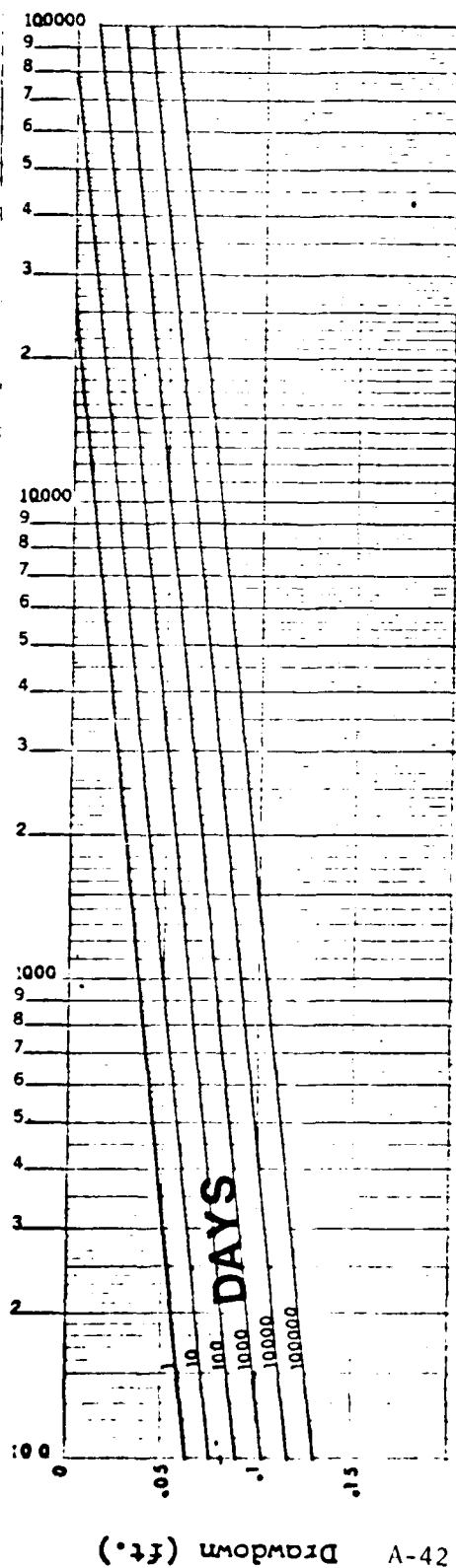
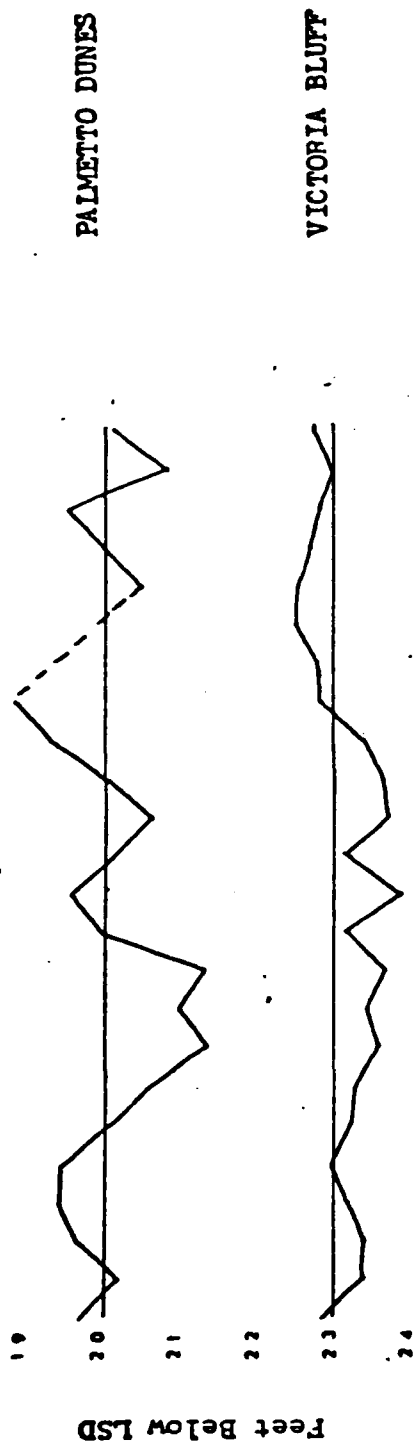


Exhibit 1 - Drawdown generated in potentiometric surface of the Ocala aquifer by a constant withdrawal of 30,000 gpd at Victoria Bluff, South Carolina.



| O N D J F M A M J J A S O N D J F M A M J J A S |
 1974 1975

Exhibit 2 - Monthly mean water levels in feet below measuring point,
October 1973 to September 1975

F. J. Rawstrom

1. Liquid waste treatment is discussed in Section 5.3.4 of this supplement and Section 1.12 of the final EIS. There will be no effluent into any waterway.
2. CB&I does not have any definite prospects for fabricating products other than LNG tanks. Some other products may require painting, which would be done inside under OSHA standards. If painting is required, any excess paint and cleaning fluids would be disposed of in compliance with applicable Federal and State standards.
3. Any ships moored at the CB&I wharf would be connected to on-shore sanitary facilities. Laws and regulations pertaining to oil spills are administered by the U. S. Coast Guard. At peak production CB&I would produce LNG tanks for two ships per year.
4. A similar comment is discussed in response 6 to a letter of the Hilton Head Public Service Council in Appendix A of this supplement.

Hugh H. Gordon

Discussion of a possible channel is expanded in Section 9 of this supplement.

National Audubon Society

1. The letters of comment on the final EIS and responses thereto are contained in Appendix B of this supplement.
2. Discussion of other products is expanded in Section 2 of this supplement.
3. Discussion of a possible channel is expanded in Section 9 of this supplement.
4. CB&I cannot enter into a contract until a plant site has been definitely selected.
5. Discussion of land deleted from the permit request is expanded in Section 3 of this supplement.
6. This supplement contains a detailed discussion of the controversial aspects of CB&I's permit application.
7. Discussion of the marine sanctuary proposal is expanded and updated in Section 5 of this supplement. Responses to comments of USDI and USDC are contained in Appendix B.

W. R. Satterfield

1. The effects of piling on the freshwater aquifer is discussed in Section 7 of this supplement.
2. Discussion of a possible channel is expanded in Section 9 of this supplement.
3. A similar comment is discussed in responses 1 and 2 to the Statement of Coalition for Lower Beaufort County on page B-93 of this supplement.

John C. Stout (Colleton River Area Landowners Association)

1. Discussion of secondary effects is expanded in Section 3 and 8 of this supplement.
2. Discussion of the marine sanctuary proposal is expanded and updated in Section 5 of this supplement.
3. Comments on the draft EIS were addressed in the final EIS. Comments on the final EIS and the responses thereto are attached as Appendix B to this supplement.

Robert H. Stafford

1. The Army Corps of Engineers held several meetings with CB&I to explain Corps requirements for input to an EIS and to apprise the applicant of available sources of environmental information. The environmental report submitted by CB&I was thoroughly evaluated and revised as deemed appropriate by this office in accordance with CEQ guidelines. All appropriate NEPA requirements as set forth by CEQ guidelines have been met. The charge of plagiarism is unfounded since CB&I prepared its report for Corps use as a source document for the EIS.
2. Discussion of the deletion of 308 acres from the permit request is expanded in Section 3 of this supplement.
3. Discussion of the provision for the fabrication of other products is expanded in Section 2 of this supplement.
4. The impact of piling on the freshwater aquifer is discussed in Section 7 of this supplement.
5. CB&I has indicated that fabrication of LNG tanks or related metal products will necessitate the employment of around 600 people. To the maximum extent possible CB&I will hire locally. As long as there is no violation of applicable Federal or State

employment laws, the Corps of Engineers cannot dictate CB&I employment practices and must rely on its assertions that it will hire locally.

5. 3. Environmental Action, Inc.

1. A similar comment is discussed in response 6 to letter of the Hilton Head Public Service Council in Appendix A of this supplement.

2. The impact of piling on the freshwater aquifer is discussed in Section 7 of this supplement. See also in Appendix A of this supplement the responses to letter from Hilton Head Public Service Council.

National Audubon Society

1. This interim final supplement contains an expanded discussion of the changes in the original permit request and also summarizes and clarifies the discussion found in the final EIS of the more controversial aspects of the permit application.

2. The comments on the final EIS and draft supplement to the final EIS and responses thereto are attached as appendices to this supplement.

3. Discussion of the proposed marine sanctuary has been expanded and updated in Section 5 of this supplement.

4. The impact of piling on the freshwater aquifer is discussed in Section 7 of this supplement. See also in Appendix A the responses to the letter from the Hilton Head Public Service Council.

5. The comments received on the final EIS and the responses prepared thereto were not distributed to the public unless requested. Neither the Corps nor other Federal agencies routinely distribute comments and responses on final EIS's.

6. The statement cited by National Audubon appears self-explanatory. The Corps did not change its mind, but simply revised a statement to more accurately reflect an evaluation, which is further substantiated in Section 5 of this supplement.

7. The reconnaissance study on a navigation feasibility study of a proposed navigation channel in the Colleton and Chechessee Rivers was commenced by the District at the request of the SCPA. This reconnaissance study was essentially completed by the District Office, but was terminated at the request of the SCPA prior to its submission

for review and approval to the South Atlantic Division Office of the Corps of Engineers in Atlanta, Georgia.

8. Additional discussion on possible future events related to the proposed LBA development has been added to this supplement.

9. The Corps acquired its information on the plans of the State Ports Authority by reviewing the deposition given by Mr. Welch, which is discussed in Section 8 of this supplement, and by asking representatives of the SPA what their plans might be.

10. The Corps did not say that the referenced law would "prevent" further industrial development as is implied by National Audubon, but only said it would "limit" further industrial development. This statement is true, since most of the SPA property which comprises a major part of Victoria Bluff would be transferred to the S. C. Wildlife and Marine Resources Department, an agency having no function in industrial development.

11. LBA did not prepare any responses to the final EIS.

Coalition for Lower Beaufort County

1. This interim final supplement contains an expanded discussion of the changes in the original permit request and also summarizes and clarifies the discussion found in the final EIS of the more controversial aspects of the permit request.

2. Discussion of the proposed marine sanctuary has been expanded and updated in Section 5 of this supplement.

3. The transcript of the public hearing contains everything spoken into either of the microphones. Because of the large size of the auditorium, statements made away from the microphone may have been missed.

4. Discussion of a possible railroad has been expanded in Section 8 of this supplement.

5. The impact of piling on the freshwater aquifer is discussed in Section 7 of this supplement. See also in Appendix A the response to the letter from the Hilton Head Public Service Council.

6. The question raised by the Department of Interior was addressed in the EIS. No further comments on this question have been made by the Department of Interior.

7. Discussion of the possible fabrication of other products has been expanded in Section 2 of this supplement.

8. Discussion of further industrialization has been expanded in Sections 3 and 8 of this supplement.

Ogeechee Audubon Society

1. Discussion of the impact of surface runoff on water quality is expanded in Section 5.3.2 of this supplement.

2. Much of the loud noise commonly associated with metal fabrication is due to riveting which is being replaced by other techniques. There would be no riveting involved in the fabrication of any of the potential products of the proposed facility nor would there be other operations which would generate sharp, loud noises in the mid to higher octave range. Metal forming in a press emits a low frequency sound and would be performed inside a building which would reduce its noise level.

3. As is discussed in Section 3.06 of the final EIS, a nesting platform is not considered necessary. However, if the Society wishes a commitment, it is suggested that the Society contact CB&I.

4. The opposition of the Society to a new channel is noted. As is stated in the expanded discussion of channel requirements in Section 9 of this supplement, any future proposal for a channel would be submitted to the public review process.

5. Attention is directed to the discussion of alternatives in Section 4 of this supplement.

R. L. Chaplin, Ph. D.

1. A similar comment is discussed in response 4 to letter of E. J. Rawstrom in Appendix A of this supplement. Additional information is also contained in Section 7 of this supplement. Contrary to the assertion in this comment, the effect of the test well on the water table was noted in Section 2.07 of the final EIS.

2. CB&I has indicated that the majority of its work force will be local residents. Therefore, there will be no significant increase in pollution caused by the small number of new residents brought into the area by CB&I.

Law Offices, Duncan, Brown, Weinberg & Palmer

No response is required.

Association of Sea Pines Plantation Property Owners, Inc.

1. Mr. Stephens provides information on shipyards and their contracts for LNG tanks showing that the need for LNG tanks has already been met. On the other hand, CB&I, by virtue of its permit request, considers that a potential market for LNG tanks exists. Realizing the effects of a variable market, CB&I made clear its intention to manufacture related metal products in its recently revised permit application which is the subject of this supplement. Therefore, based on the information at hand, a detailed analysis of market demand for LNG tanks is not warranted. In any event, CB&I does not have any definite commitments and has informed the Corps that it cannot enter into any contracts until it has a definite decision on the application.

2. The EIS indicated that construction of the proposed facility would take "about 12 months", but did not say the facility would be built 12 months after the permit is issued. The EIS also clearly stated that contracts would determine the production rate which in turn would determine the number of employees and hours worked. Notice of Public Hearing dated 4 August 1975 addresses the build up of the work force.

3. Discussion of the deletion of 308 acres from the permit request is expanded in Section 5 of this supplement.

4. The Port Royal estuary is discussed in detail in the final EIS and also in Section 5 of this supplement.

5. The Corps has not yet decided whether or not it is in the public interest to issue the requested permit.

6. The effects of piling on the freshwater aquifer is discussed in Section 7 of this supplement.

7. CB&I has indicated that estimated need for raw materials would require about two trucks per day. All of its products would be shipped by water because of size or weight.

8. See response 5 above. Alternative uses of the area are discussed in Section 4 and 8 of this supplement.

Colleton River Land Owners Association

1. Discussion of other products is expanded in Section 2 of this supplement.

2. Discussion of land deleted from the permit request is expanded in Section 3 of this supplement.

END

FILMED

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DTIC