

**CESAS Form 19 Support Documentation**  
**St. Marys Intercoastal Gateway Dock**  
**Camden County, Georgia**  
**Revised July 14, 2017**  
**Revised February 12, 2018**

The following information is submitted as support documentation in association with the attached application requesting authorization to impact waters of the U.S. pursuant to Section 10 of the Rivers and Harbors Act of 1899 and the Coastal Marshlands Protection Act of 1970 pursuant to the Official Code of Georgia Annotated, Part 12-5-286 (OCGA).

**1.0 Project Description**

The City of St. Marys (applicant) is proposing to expand the existing St. Marys Gateway Dock (formally the Gilman Dock) to provide dockage for tourists and visitors of St. Marys as well as other transient boaters. Additionally, prior to construction of the proposed project, the applicant is proposing to retain temporary facilities on-site that were installed under a Letter of Permission (LOP) / Emergency Order (EO). These temporary docks accommodate transient boaters and ferry service to Cumberland Island which were displaced from the National Park Service (NPS) docks by Hurricane Irma. The project site is located on the St. Marys River at the eastern corner of St. Marys Street East and Ready Street in St. Marys, Camden County, Georgia.

**2.0 Permitting Background**

In 1984, the DNR issued Permit #172 to Gilman Paper Company for installation of 480 feet of concrete bulkhead with 225 cubic yards of backfill in front of a pre-existing wooden bulkhead on the project site. The bulkhead was installed as permitted. In July 2010, the applicant purchased the project site with the intention of re-developing the parcel. In November 2013, the DNR issued Permit #522 to change the use of the existing dock structure from a community dock to a public dock. No construction was authorized by the permit.

**3.0 Site Conditions**

The habitats within the footprint of the proposed waterside activities consist of open water and vegetated saltmarsh. The upland area consists of an existing mowed and maintained grass lawn. Upstream of the project site is Lang's Marina East and other commercial dock facilities located along the St. Marys waterfront. No dock facilities are located downstream of the project site.

The majority of the jurisdictional habitat consists of open water ranging from 0 to 31 feet deep. Given the sufficient depths of the river, no dredging is required for this project. The bank (e.g. CMPA jurisdiction line) is stabilized with a 440' x 2' x 5' (h) bulkhead and concrete cap that was authorized under Permit #172. Approximately 10 – 20 feet of marsh exists channelward of the bulkhead and is vegetated with smooth cordgrass (*Spartina alterniflora*), sea oxeye (*Borrchia frutescens*), and perennial glasswort (*Salicornia virginica*). The upland consists of a St. Augustine grass (*Stenotaphrum secundatum*) lawn with scattered palmetto (*Sabal palmetto*), live oak (*Quercus virginiana*), eastern red cedar (*Juniperus virginiana*), and southern magnolia (*Magnolia grandiflora*).

The pre-Irma dock consisted of the following: An 11-foot wide fixed wooden walkway extends from the concrete bulkhead approximately 158 feet into the waterway. Near the channelward end of the walkway is a 23' x 10' roofed portion. The roof is 9.25' high. An L-shaped deck extends upstream (west) from the end of the walkway and is approximately 58' x 6'. Just landward of the L-shaped deck are five +/- 18-inch single-pile mooring dolphins. On the downstream side of the walkway, opposite the L-shaped deck, is a 30.5' x 8'-4" concrete float connected to the walkway by a 25' x 4'-2" aluminum gangway along with two breasting dolphins. The existing dock extends approximately

158 feet into the waterway where the St. Marys River is over 1,200 feet wide at mean low water. Existing structures over jurisdiction total approximately 2,444 ft<sup>2</sup>.

#### **4.0 Project Justification**

All structures included in this permit application are water dependent. No non-water dependent structures are proposed. There is an observable need for short term transient boater use at the City's waterfront as there is currently no public dock facility for transient boaters who wish to shop, dine, or stay in St. Marys. The city's waterfront has nine other dock facilities not including the St. Marys Gateway Dock which include:

- Lang's Marina East – permanent mooring on a fee basis
- Lang's Seafood – private mooring of fishing vessels
- Lang's Marina West – permanent mooring on a fee basis
- Wheeler Street Boat Ramp – temporary docking for vessel launch and recovery (30 minute limit)
- DNR Kayak Dock/City Fireworks Dock – kayak docking and temporary docking (overnight mooring prohibited)
- Pavilion Fishing Dock – fishing only (vessel mooring prohibited)
- DNR Fishing Dock at Gilman Park – fishing only (vessel mooring prohibited)
- National Park Service Dock – access to Cumberland Island
- National Park Service – access to Cumberland Island

Additionally, with roughly half of the St. Marys River lying within the jurisdictional responsibility of the State of Florida, boats anchored there legally (Florida has different liveaboard requirements) have no place to access the city's waterfront. The proposed project will provide the dock space needed to satisfy this concern as well as other visitors to St. Marys and will provide water access for the future hotel and convention center development on-site.

There is also an urgent need to provide temporary accommodations for transient boaters and ferry service which were displaced by Hurricane Irma. All of the above-mentioned dock facilities along St. Marys waterfront were significantly damaged or destroyed during Hurricane Irma in September 2017. The existing Gateway Dock sustained some damage but was relatively unscathed. The damaged facilities include the NPS dock which provided ferry service to Cumberland Island. A LOP and EO was issued in October 2017 to repair the Gateway Dock and to install temporary floats/gangways to maintain ferry service to Cumberland Island as well as transient mooring while the NPS dock was being repaired. Another authorization was issued in October to the NPS to repair their St. Marys dock, but it is unclear when those repairs will be completed. Therefore, as part of this proposed permit action, the applicant is requesting authorization to retain the temporary floats until the NPS docks are repaired and functional, at which time, the applicant will remove the temporary structures.

#### **5.0 Proposed Activities in Jurisdiction**

The applicant is proposing to revitalize this portion of the city by constructing a hotel and conference center on the upland which is owned by the city. That portion of the project is still in the planning stages, but the proposed dock improvements will directly serve this facility as well as meet the need for tourists of St. Marys and other transient boater docking. The site plan calls for construction of a pier head at the end of the existing walkway which will remain in place. A C-shaped floating dock will extend from the upstream side of the pier head and in front of the pier head. This float will provide docking opportunities for larger vessels. Downstream of the pier head and landward of the outer floating dock will be another floating dock system with seven fingers extending on both sides of it. This dock will provide protected mooring opportunities for smaller vessels. To account for the sometimes strong east and southeast winds coming off the St. Marys River, the proposed improvements were designed so that the single outer C-shaped float will also act as a wave attenuator for the smaller vessels moored at the finger docks. The main floats will be 12 feet wide, and the

finger floats will be 4 feet wide. All floats will contain the appropriate mooring hardware and fender/rub-rail system along the edges. For the purposes of this application, a 13.4-foot total width and 5.4-foot width was given to the main floats and finger floats, respectively, to account for the fenders. In order to minimize the amount of dock structure in the waterway, and to ensure that the amount of dock space does not exceed the demand, the applicant has proposed to phase the construction of the dock improvements as outlined below. Future phases will not commence until the demand for additional dock space is demonstrated by the applicant; however, prior to construction of the project, the applicant is proposing to retain the existing temporary floats which were authorized by LOP / EO to accommodate ferry service and other mooring opportunities displaced by Hurricane Irma.

**Temporary Structures:**

As mentioned above, the applicant proposes to retain the existing temporary floating dock structures which were authorized by LOP / EO on October 10, 2017. Once the repairs are made to the NPS docks and service is restored there, the temporary floats at the Gateway Dock will be removed, and the applicant will proceed with the rest of the project. The temporary structures include re-surfacing the existing gangway on the east side of the dock and replacing the existing 8' x 30' (240 ft<sup>2</sup>) float with a 10' x 40' (400 ft<sup>2</sup>) float. Approximately 94 square feet of the existing L-shaped pierhead will be removed from the western terminus. Landward of the pierhead will be a 7' x 75' (525 ft<sup>2</sup>) gangway extending to a 9' x 20' (180 ft<sup>2</sup>) floating platform attached to the landward side of a 10' x 40' (400 ft<sup>2</sup>) float. A platform on the float will be used to access the ferry vessels. The temporary structures (minus existing structure to be removed) total 1,171 square feet and will extend no further channelward than the pre-storm structures. Maintaining ferry service to Cumberland Island is vital to the local economy of St. Mary's as it is responsible for over 60,000 visitors to the community per year. It is unclear at this time how long the temporary floats will need to stay in place, but once the repairs are made to the NPS docks and ferry service returns to that facility, the temporary floats will be removed from jurisdiction.

**Phase I:**

Once the temporary ferry docks are removed from the Gateway Dock, the applicant will commence with Phase I of the project. Phase I includes the installation of a 20' x 11' (220 ft<sup>2</sup>) walkway extension off the end of the existing walkway leading to a 20' x 20' (400 ft<sup>2</sup>) fixed pier head covered with a 12' high roof. Upstream of the pier head, an 80' x 4' (320 ft<sup>2</sup>) ADA-compliant gangway will lead to a 13.4' x 320.7' concrete C-shaped floating dock system totaling 4,297 ft<sup>2</sup>. The area of all new structures proposed within jurisdiction for Phase I totals 5,237 ft<sup>2</sup>. Also included in Phase I is the removal of the existing 30.5' x 8'- 4" (254 ft<sup>2</sup>) concrete float and 25' x 4'-2" (104 ft<sup>2</sup>) gangway located downstream of the existing fixed deck. The applicant will also remove the existing 58' x 6' (348 ft<sup>2</sup>) L-shaped pierhead and mooring / breasting dolphins. The existing roofed section of the existing walkway will remain. The total area of existing structures to be removed from the waterway is 706 ft<sup>2</sup>.

<b>Phase I</b>	<b>Impact (sq feet)</b>	<b>Impact (acres)</b>
Walkway Extension	220	
Pier Head	400	
Gangway	320	
Floating Docks	4,297	
<b>Total</b>	<b>5,237</b>	<b>0.1202</b>

**Phase II:**

Once the demand for additional float space is demonstrated, the applicant will proceed with Phase II of the project. On the downstream side of the C-shaped floating dock will be a 140' x 13.4' float extension (1,876 ft<sup>2</sup>). On the downstream side of the fixed pier head will be a 40' x 4' gangway (160 ft<sup>2</sup>) leading to a finger floating dock system with three fingers each on the channelward and landward

side. The main float will be 119.6' x 13.4' (1,608 ft<sup>2</sup>). The three channelward fingers will be 36.7' x 5.4', and the three landward fingers will be 40.7' x 5.4' each (1,254 ft<sup>2</sup> total including the fillets). The docking slips will be 31 feet wide. The area of new structures proposed within jurisdiction for Phase II totals 4,893 ft<sup>2</sup>.

<b>Phase II</b>	<b>Impact (sq feet)</b>	<b>Impact (acres)</b>
Float Extension	1,876	
Gangway	160	
Landward Float	1,603	
Finger Floats (6 Total)	1,254	
<b>Total</b>	<b>4,893</b>	<b>0.1123</b>

**Phase III:**

Phase III of the project will add additional docking slips on the finger float and is the final phase of construction. Phase III will be initiated when the need arises for additional mooring space. On the downstream side of the C-shaped floating dock will be a 140.7' x 13.4' float extension (1,885 ft<sup>2</sup>). On the downstream side of the finger float will be a 134.3' x 13.4' float extension (1,800 ft<sup>2</sup>). Four additional fingers will be added on the channelward and landward side of the main float. The fingers will match the dimensions of the fingers constructed in Phase II and will total 1,672 ft<sup>2</sup> including fillets. With the exception of the outermost slips which will be 38' wide to accommodate larger boats, the docking slips will be 31 feet wide. Also, a single +/- 18-inch mooring dolphin will be installed in each of the two outside slips to provide better mooring for sailboats and other types of vessels. The area of all structures proposed within jurisdiction for Phase III totals 5,357 ft<sup>2</sup>.

<b>Phase III</b>	<b>Impact (sq feet)</b>	<b>Impact (acres)</b>
Float Extension	1,885	
Landward Float Extension	1,800	
Finger Floats (8 Total)	1,672	
<b>Total</b>	<b>5,357</b>	<b>0.1230</b>

The proposed walkway extension and pier head will be supported by 18" timber piles. All proposed floating docks will be attached to 14-inch or 18-inch square concrete piles for stability and will contain appropriate cleats, facias, bumpers, and other mooring hardware which is expected to extend approximately 8-9 inches on each side of the 12' wide floating docks and 4' wide finger floats. With all three phases of the project, all new structures over jurisdictional waters total 15,487 ft<sup>2</sup> (0.356 acre). When combined with the existing fixed deck to remain (1,738 ft<sup>2</sup>) minus the existing structures to be removed, all structures over jurisdiction upon final build out will total 17,225 ft<sup>2</sup> (0.395 acre).

Overnight tie ups will be allowed for boat owners, but no jet skis or live-aboards will be allowed. It is envisioned that a maximum stay of two weeks will be incorporated into the dock rules. The dock will provide water and electricity for users, but no fuel facilities will be provided. Fuel is available at the adjacent Lang's Marina East which will be located at least 102 feet from the proposed dock. A proposed pump out facility will be located at the end of the fixed dock and is intended for large vessels (such as the tall ship *Peacemaker*) or smaller cruise ships. All water and pumpout components will be routinely inspected and maintained to ensure no leaks or other functional issues occur. No restrooms, laundry facilities, showers, restaurants, etc. will be associated with the dock. Any such facilities would be incorporated into the proposed development in the upland. No dredging, fill, bank stabilization, or anticipated future maintenance dredging is required for the project. The proposed structures will extend approximately 302 feet into the waterway where the waterway is at least 1,200 feet wide. The proposed channelward extension will conform to the existing distances of the upstream commercial dock facilities and will not impact navigation in the waterway. All work will be

conducted by waterborne crane and barge in a manner to minimize turbidity in the waterway, and the applicant will ensure that no oils or other pollutants are released into the waterway during construction.

#### **6.0 Upland Component:**

Both the proposed dock improvements and the upland hotel/convention center development have independent utility. The dock will accommodate tourists and other transient boaters who wish to visit St. Marys and will not be restricted to use only by guests of the proposed development. The floats will provide mooring space for the general public as well as for guests of the development on a first-come-first-serve basis with an associated fee, and they will not be restricted for private use only. Likewise, although the dock facility enhances the upland development, the development does not depend on the existence of the dock.

The existing dock walkway ends at the existing bulkhead cap located along the CMPA jurisdiction line. None of the dock walkway is located over upland, and no future walkway modifications are proposed in the upland to access the dock. There is currently a pedestrian path located along the waterfront for public use and enjoyment. The path also provides access to the dock facility and will provide access in the future, but the path has independent utility and is not dependent on the dock. Any additional pathway improvements leading from the convention center / hotel development in the upland to the waterfront would also have independent utility. It was determined that any upland improvements on the site could exist strictly for public enjoyment and access to the waterfront without the existence of the dock facility. Therefore, there is no upland component associated with the proposed project.

#### **7.0 Avoidance and Minimization of Impacts**

Because the proposed structures are water dependent, alternative sites for the proposed project were not considered. It is assumed that alternative sites would still require structures within jurisdiction to accommodate transient boaters who visit the city. The applicant has, however, revised the proposed dock design several times and incorporated a variety of measures to avoid and minimize impacts to coastal marshlands, navigation, etc.

First, the applicant is proposing to expand an existing dock facility instead of constructing an entirely new structure on the project site or on an alternative site. This lessens the overall impact associated with construction of a new walkway. The original design for the project called for a 900 ft<sup>2</sup> pierhead to be constructed adjacent to the existing fixed L-shaped pierhead. In effort to minimize impacts to the greatest extent practicable, the applicant revised the site plan to reduce the size of the pier head and remove the existing L-shaped pierhead so that the total pierhead square footage does not exceed 400 ft<sup>2</sup>. The applicant is also proposing to remove other structures from the waterway such as the existing float, gangway, L-shaped pier, and stand-alone mooring and breasting dolphins. The removal of all structures from the waterway totals approximately 706 ft<sup>2</sup>.

To help reduce excessive accumulation of marsh wrack within the C-shaped floating dock, the final design will provide at least 10% of clear opening space to allow flow circulation to pass through the basin with the current. It is anticipated that the outgoing spring tides will flush the basin adequately, but a maintenance program will also be established to address neap currents experienced throughout the year.

To avoid interference with access to Major Moore Creek and to ensure the downstream finger floats had adequate depths at all tide cycles, the applicant incorporated a 20' walkway extension into the overall design. The extension will put the finger floats approximately 100 feet from the creek mouth at high tide and will allow at least 50 feet of clearance between the finger floats and MLW at the creek mouth during low tide. It should also be noted that this small creek goes dry at some tide cycles and is not accessible at low tide. This design measure also reduces the likelihood of any future maintenance

dredging as a result of discharge or siltation from Major Moore Creek. This creek has a relatively small drainage basin, and does not appear to discharge much sediment into the St. Marys River. There is approximately 10 – 16 feet of depth at the landward-most tip of the finger floats, and the creek discharges under the existing fixed walkway at low tide instead of at the proposed location of the finger floats. These depths have been stable for many years with no evidence of past or recent shoaling in this area, and there is no reason to believe there will be increased sedimentation in the area in the future. It is therefore not anticipated that maintenance dredging will be required in the future.

The most significant avoidance and minimization measure, however, is the applicant's proposal to phase the project. Phasing the project ensures that the proposed structures do not exceed the actual demand for dock space and that the floating docks do not remain unused. Upon permit approval, the applicant will construct Phase I of the project but agrees to not construct the subsequent phases until the need arises for additional floating dock space. The applicant will provide appropriate documentation to DNR demonstrating the need/demand for additional dock space prior to initiating subsequent phases.

### **8.0 Threatened and Endangered Species**

The property was assessed for the potential occurrence of threatened and endangered species and habitats suitable to sustain these listed species for Camden County, Georgia. The habitats found on site consist of open water, vegetated marsh, and maintained lawn. The upland habitat is not suitable to support any protected species. The jurisdictional habitat could potentially support shortnose sturgeon, Atlantic sturgeon, west Indian manatee, and sea turtles. The project consists of improvements to an existing dock structure and requires the installation of a relatively small number of wood piles and small concrete piles. The project will be phased over a number of years resulting in three short construction periods instead of one longer, more significant construction period. The short construction periods significantly reduce the overall noise levels and disturbance to aquatic habitat. The small pile size, the small number of piles, and the phasing of the project (short construction periods) combined with the very large size of the river indicate that the project would have no effect on either sturgeon species. Also, the pile driving and dock improvements will have no effect on sea turtles. To avoid adverse effects on the west Indian manatee, the U.S. Army Corps of Engineers (USACE) standard manatee conditions will be employed during construction.

### **9.0 Essential Fish Habitat**

The proposed waterside activities are located within the St. Marys River which has been identified as Essential Fish Habitat (EFH). The proposed project, however, only requires new structures over deep open water. It is widely accepted that structures or shading over deep water is not known to have an adverse affect on the benthic community. The proposed project will utilize the existing walkway and no shading of vegetated marsh, intertidal area, or shallow subtidal habitat is proposed. It was therefore concluded that the proposed project would not adversely affect EFH.

### **10.0 Impaired Waters**

The project site is not located within or upstream of a waterway listed on the 303(d) List of impaired waters.

### **11.0 Supplemental Information**

This additional information is provided for compliance with Coastal Marshlands Protection Act of 1970 information requirements:

#### **OCGA 12-5-286. Permits to fill, drain, etc., marshlands.**

*(b) Each application for such permit shall be, properly executed, filed with the department on forms as prescribed by the department, and shall include:*

GA DNR / HMP

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**(1) The name and address of the applicant-**

City of St. Marys  
Attn: Mr. Bobby Marr  
418 Osborne Street  
St. Marys, Georgia 31558

**(2) A plan or drawing showing the applicant's proposal and the manner or method by which such proposal shall be accomplished. Such plan shall identify the coastal marshlands affected-**

See attached drawings from Ball Maritime Group, LLC

**(3) A plat of the area in which the proposed work will take place-**

A plat of the property is attached.

**(4) A copy of the deed or other instrument under which the applicant claims title to the property or, if the applicant is not the owner, then a copy of the deed or other instrument under which the owner claims title together with written permission from the owner to carry out the project on his land. In lieu of a deed or other instrument referred to in this paragraph, the committee may accept some other reasonable evidence of ownership of the property in question or other lawful authority to make use of the property; The committee will not adjudicate title disputes concerning the property which is the subject of the application; provided, however, the committee may decline to process an application when submitted documents show conflicting deeds-**

Attached is a copy of the deed to the property.

**(5) A list of all adjoining landowners together with such owners' addresses, provided that if the names or addresses of adjoining landowners cannot be determined, the applicant shall file in lieu thereof a sworn affidavit that a diligent search, including, without limitation, a search of the records of the county tax assessor's office, has been made but that the applicant was not able to ascertain the names or addresses, as the case may be, of adjoining landowners-**

CALVIN LANG dba Lang's Marina East  
POST OFFICE BOX 388  
SAINT MARYS, GA 31558

JOHN MILLER et al  
100 CEDAR POINT  
SAINT MARYS, GA 31558

**(6) A letter from the local governing authority of the political subdivision in which the property is located, stating that the applicant's proposal is not violate of any zoning law;**

Attached is the letter from the City of St. Marys Planning and Zoning Department certifying that the proposed activities are not in violation of the zoning ordinances of the City.

**(7) A non-refundable application fee to be set by the board in an amount necessary to defray the administrative cost of issuing such permit. Renewal fees shall be equal to application fees, which shall not exceed \$1,000.00 for any one proposal and shall be paid to the department.**

A check in the amount of \$500.00 has been provided to the DNR.

**(8) A description from the applicant of alternative sites and why they are not feasible and a discussion of why the permit should be granted-**

All proposed structures are water dependent, and there is not a non-water dependent alternative to provide docking for transient boaters. It is therefore assumed that any other alternative site would require just as much or more impact. See above project description for details.

**(9) A statement from the applicant that he has made inquiry to the appropriate authorities that the proposed project is not over a landfill or hazardous waste site and that the site is otherwise suitable for the proposed project-**

Since this application is for the extension of an existing permitted dock, and to the best of the City's knowledge, the property is suitable for the uses/structures proposed by this application. According to a review of the EPD Hazardous Site Inventory (Revised July 2013) there are no known Landfill or Hazardous waste materials present.

**(10) A copy of the water quality certification issued by the department if required for the proposed project-**

It is anticipated that the project would be authorized by a Letter of Permission from the U.S. Army Corps of Engineers (USACE), and a 401 Water Quality Certification would not be required. This will be confirmed once application is made with the USACE.

**(11) Certification by the applicant of adherence to soil and erosion control responsibilities if required for the proposed project-**

The project will conform to all required land disturbing and stormwater management permits as required by the City of St. Marys and/or Camden County, Georgia.

**(12) Such additional information as is required by the committee to properly evaluate the application.**

This application has been prepared with consideration for the interests of the general public of the State of Georgia as defined in OCGA 12-5-286(g).

**OCGA 12-5-286. Permits to fill, drain, etc., marshlands.**

**(g) In passing upon the application for permit, the committee shall consider the public interest, which, for purposes of this part, shall be deemed to be the following considerations:**

**(1) Whether or not unreasonably harmful obstruction to or alteration of the natural flow of navigational water within the affected area will arise as a result of the proposal-**

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The proposed project will not alter natural flow of navigable waters nor will it obstruct public navigation. The proposed dock improvements will conform to the marina facility immediately upstream as well as other marina/commercial docks on the waterway and will be located at least 102 feet from Lang's Marina East. The proposed structures will extend 302 feet into the waterway where the waterway is over 1,200 feet wide. The proposed structures will also not encroach on access to Major Moore Creek as the proposed structures will be approximately 100 feet from the creek mouth at high tide (the creek is not accessible at low tide).

***(2) Whether or not unreasonably harmful or increased erosion, shoaling of channels, or stagnant areas of water will be created-***

The proposed project will not increase erosion, shoaling of channels, or create stagnant areas of water. Major Moore Creek which discharges under the existing walkway has a relatively small drainage basin, and does not appear to discharge much sediment into the St. Marys River. There is approximately 10 – 16 feet of depth at the landward-most tip of the finger floats, and these depths have been stable for many years with no evidence of past or recent shoaling. The proposed project should have no effect on shoaling, and it is unlikely that maintenance dredging will be required in the future as a result of increased sedimentation from Major Moore Creek

***(3) Whether or not the granting of a permit and the completion of the applicant's proposal will unreasonably interfere with the conservation of fish, shrimp, oysters, crabs, clams, or other marine life, or wildlife, or other resources, including but not limited to water and oxygen supply-***

The proposed project will not interfere with the conservation of fish, shrimp, oysters, crabs, clams, or other marine life, or wildlife, or other resources, nor affect water and oxygen supply.

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