

PROJECT DESCRIPTION AND  
SUPPORT DOCUMENTATION FOR THE JOINT APPLICATION  
FOR THE  
**WHARF ST. MARYS**  
Camden County, Georgia

1. **BASIC PROJECT DETAILS**

The Camden County Joint Development Authority proposes to develop a ~53-acre site on the southern portion of the former Durango Paper Mill site in St. Mary's, Camden County, Georgia (Appendix A, Figure 1). The ~53-acre parcel is part of a ~723-acre parcel currently owned by Old Weed and Ready Plantation, LLC. The property was formally owned by Gilman Paper Company who began operations in 1940. Later, the property was purchased by Durango-Georgia Paper Company Mill which ceased operations in 2002 upon its bankruptcy. The current owner has acknowledged and supports the proposed development as stated in his letter dated May 14, 2018 found in Appendix 8 of this application. The proposed development is a re-development of a ~53-acre portion of the former paper mill operations. The materials in this application provide specific details of prior use, existing site conditions, and pending remedial activities that will be employed because of this project.

The proposed project is named **WHARF ST. MARYS**. The project will consist of a full-service marina facility to be constructed along the west bank of the North River. The general scope of the project includes the creation of a 9.36-acre marina basin with 165 wet slips, 304 dry slips, and a marine service boatyard with haulout capabilities. A portion of the marina facility (boatyard slips, transient slips, and outer fuel docks) will be constructed over the existing river bottom, while the wet slips, drystack dropwell, travel lift piers, and associated staging docks will be located within the man-made basin, which is to be constructed through the excavation of 9.36 acres of upland property (formerly an operating papermill for 50 years). Bulkheads will be constructed around the perimeter of the new marina basin, and landward of the bulkheads will be a boatyard repair facility, a drystack facility, and a marina office. A confined disposal facility will also be constructed and maintained nearby, for the purpose of future maintenance dredging of the marina basin.

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The following information and attached materials are provided to pursue Coastal Marshlands Protection Act (CMPA) and Section 10 of the Rivers and Harbors Act permits.

### 1.1 Existing Site Conditions:

General information pertaining to the existing site conditions for the ~53-acre site can be found in Appendix 1; Figures 1 thru 10. Included in this Appendix are Figure 1 Vicinity Map, Figure 2 USGA Topographic Image, Figure 3 NRCS Soil Survey, Figure 4 National Wetland Inventory, Figure 5 FEMA Flood Zone Data, and Figure 6 LiDAR Digital Elevation Model data.

Attention should be given to Figures 7 thru 10 that provide aerial imagery of the site. More specifically, Figures 7 & 8 define the site conditions while the paper mill was still standing. Figures 9 & 10 define the site post demolition of the paper mill and current residual debris that remains.

Close attention should be given to these aerials to help understand that this is a re-development of an industrial site and as such, much of proposed development is to occur on previously used, hardened structures of one form or another. Lastly, where possible, otherwise none existent storm water management tools will be installed to improve site conditions.

### 1.2 Jurisdictional Determination:

In January 2016, Environmental Services, Inc. (ESI) delineated the ~723-acre site for the Bankruptcy Estate of Durango Georgia Paper Company. On February 22, 2016 the Corps of Engineers issued a preliminary jurisdictional determination for the site which remains valid until February 22, 2021. The delineation of the larger site, which includes the ~53-acre subject property, is depicted on the survey prepared by Thomas & Hutton revised date 12/15/15, *Wetland Survey of Port of St. Marys Industrial And Logistics Center* (Appendix 16). There are no freshwater wetlands located within the ~53-acre project boundary.

In early 2018, ESI revisited the ~53-acre site to perform a formal delineation of the subject property to establish the extent of the **salt marsh boundary**. ESI performed this effort in 2015 and acquired the verification from DNR in August 2015. The States verification process is valid for 1-year and expired in August 2016. The 2018 salt marsh delineation was performed in accordance with the *Coastal Marshlands Protection Act of 1970* and was effectively the same as the earlier delineation given the majority of the river front consists of a hardened rig-rap slope. On

5 June 2018 ESI and DNR staff completed a field visit to verify the recent delineation. The 2018 salt marsh boundary has been surveyed and is depicted on the survey prepared by Thomas & Hutton revised date 5/2/18, *Wetland Exhibit for Portion of The Port of St. Mary's Industrial And Logistics Center*. DNR verified the above referenced delineation in a letter dated 15 June 2018. (Appendix 15).

1.3 Proposed Impacts:

The project will result in no freshwater wetland impacts. Impacts associated with work located within tidal waters is limited to the shading footprint and pile installation of the floating docks, fixed walkways, and gangways associated with the boatyard docks located north of the marina basin entrance and the transient docks located south of the marina basin entrance. Additional impacts are associated with minor rip-rap placement along the east side of a newly proposed bulkhead located in uplands immediately east of the marina office and the excavation of existing rip rap along the river's edge and water bottoms below the toe of rip rap to create the entrance into the marina basin. Details of this work can be found in Appendix 2 and in the table below.

Table 1.

Area Name	Activity Type	Habitat	Area of Impact (Acres)	Impact Type
Boatyard docks	<ul style="list-style-type: none"> <li>Pile and floating dock installation</li> </ul>	OW/WB RR	~11,511.5 sf. total  ~11,390.5 sf. ~121 sf.	<ul style="list-style-type: none"> <li>Shading</li> <li>Floating dock: ~ (54) 18" dia. steel pipe piles in river.</li> <li>(1) into rip rap.</li> <li>Fixed dock: ~ (4) 14" square concrete piles in river.</li> <li>~ (4) 14" square concrete piles into rip rap.</li> </ul>
Transient docks	<ul style="list-style-type: none"> <li>Pile and floating dock installation</li> </ul>	OW/WB VM/MF	~10,703.6 sf. total  ~9,489.6 sf. ~1,254 sf.	<ul style="list-style-type: none"> <li>Shading</li> <li>Floating dock: ~ (49) 18" dia. steel pipe piles in river.</li> </ul>
Basin Entrance	<ul style="list-style-type: none"> <li>Excavation of basin entrance</li> </ul>	OW/WB RR	~17,860 sf. total  ~15,246 sf. ~2,614 sf.	<ul style="list-style-type: none"> <li>Excavation of rip rap area and water bottoms.</li> </ul>

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Bank Stabilization South of Basin Entrance	<ul style="list-style-type: none"> <li>Rip Rap installation</li> </ul>	VM/MF	~75 sf. total	<ul style="list-style-type: none"> <li>Placement of rip rap at toe of new bulkhead.</li> </ul>
Bank Stabilization North of Basin Entrance	<ul style="list-style-type: none"> <li>Supplemental Rip Rap installation</li> </ul>	RR	~9,200 sf.	<ul style="list-style-type: none"> <li>Placement of rip rap on top of the existing revetment north of the basin entrance.</li> </ul>

\*\* OW/WB = Open Water/Water Bottoms, RR = Existing Rip Rap within Jurisdiction, MF = Mud Flat, VM = Vegetated marsh

2. SITE PLANS

Appendix 2, Sheets 1-23; dated 06/14/18 provide specific details associated with the project.

2.1 *Marshlands Component of Project:*

The marshlands component for this project is graphically defined in Appendix 4. Attention should be given to Sheets UC-1, UC-2A, and UC-3A to comprehend how the proposed project relates to the current site conditions. The marshland component, generally defined as the part of the project in an estuarine area requiring a permit under The Coastal Marshlands Protection Act, generally includes the boatyard docks, fixed walkway, gangway and supplemental rip rap placed upon the surface of the existing revetment located north of the basin entrance, transient docks and gangway located south of the basin entrance, the dredging efforts needed to create the entrance to the basin, and a small portion of rip rap for bank stabilization located along a small bulkhead to be constructed in uplands immediately east of the marina store. Refer to Appendix 21 for details pertaining to the “draft” Marina Operations and Maintenance Manual. Details associated with the marshlands component of the project are graphically defined in Appendix 2; Sheets 1 - 23 and discussed further below:

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**Boatyard Slips, Transient Slips and Outer Fuel Dock (over river bottom):**

Along the bank of the North River, located over the river bottom, outside of the man-made marina basin, are several floating docks to be used for various purposes:

- **Boatyard Slips:** North of the basin entrance channel are the Boatyard Slips, to be used in conjunction with storage of larger vessels using the boatyard and haulout facilities. These floating docks consist of two side-tie docks running north-south, each at 10'-8" wide x 440'-8" long, connected by a short 10'-8" wide x 65' long dock segment. These Boatyard Slips are accessed by a 11' wide x 45'-6" (40' of which is located in jurisdictional areas) long fixed pier leading to a 4'-8" x 40' long gangway. These slips can also be accessed by the Travel Lift Staging Dock extending east from the upland dug basin. The boatyard docks provide ~1,579 lf of side-tie mooring (~24 slips – 60' vessel length).
- **Transient Slips and Outer Fuel Dock:** South of the marina basin entrance channel are the Transient Slips and the Outer Fuel Dock. These floating docks consist of two side-tie docks running north-south, one at 10'-8" wide x 353'-8" long and the other at 12'-2" wide x 345'-8" long, connected by a short 12'-2" wide x 82' long dock segment. The inner portion of these transient docks will house a second fueling station with gasoline and diesel fuel dispensers as well as a second sewage pumpout station. The fuel system will be designed with appropriate leak detection and safety shut-off technology. These Transient Slips are accessed by a 7'-3" wide x 80' long ADA-compliant gangway. These slips can also be accessed by E Dock extending east from the upland dug basin. The transient docks provide ~1,282 lf of side-tie mooring (~20 slips – 60' vessel length).
  - The applicant intends to seek federal funding from the Boating Infrastructure Grant (BIG) Program to offset the construction costs associated with the transient facilities. The Sportfishing and Boating Safety Act of 1998 established BIG to provide funding to States, the District of Columbia, Commonwealths, and territories for the development and maintenance of facilities for transient nontrailerable recreational vessels. Through the program's intend and eligibility

criteria, BIG-funded facilities provide many benefits to the communities in which they are located, such as:

- Inter-state commerce and economic impact
  - ADA accessible boating facilities
  - State-of-the-art marina design and construction
  - Durable, long-lasting facilities
  - Environmental quality and sustainability
  - Vibrant and active marinas and waterfront destinations
- **Basin Entrance Excavation:** To connect the upland excavated basin to the North River, a ~0.41-acre (~17,860 sf.) area will be excavated along the existing revetment east into the river. The ~0.41-acre area is currently comprised of ~0.06-acres (~2,614 sf.) of existing revetment along the river bank, and ~0.35-acres (~15,246 sf.) of natural river bottom. The total excavated area will involve the removal of ~6,700 cy of material. The basin entrance will be excavated after the basin itself has been constructed. The existing rip rap bank will be removed with a long reach hoe and those materials placed in trucks and disposed of as appropriate. The remaining materials will be hydraulically dredged and deposited into the on-site confined disposal facility. . Appendix 2; Sheets 8, 9, 13, and 14 provide specific details.
  - **Bank Stabilization:** There are two areas of bank stabilization. Located north of the basin entrance the North River has been subjected to a haphazard placement of revetment materials during the paper mill development and operations since 1940. The current materials are unstable in places and need supplemental enhancement. Appendix 2; Sheet 6 define a plan view and Sheet 12; cross-section A-A provides a section view of this activity. This area measures ~460' long by ~20' wide (~0.2-acres / ~9,200 sf.). The current revetment is an unvegetated bank.

Located south of the basin entrance is the second area of bank stabilization. As depicted in Appendix 2; Sheets 8, & 9, the proposed basin bulkhead will extend east out of the basin and turn south along the upland side of the jurisdictional boundary. Rip rap will be placed along the toe of the basin bulkhead, all of which is located currently in upland. At the point the new bulkhead turns south along the jurisdictional boundary, rip rap will be placed alone

the toe of the bulkhead for stabilization and scour protection purposes. Appendix 2; Sheet 13, cross-section E-E, Sheet 14, cross-section F-F, and Sheet 17, cross-section J-J define the details associated with this activity. The rip rap placement along the southern half of the new bulkhead represents ~75 sf. *Note*, impacts denoted by crosshatching on Sheets 8 & 9, and labeled shoreline excavation area, have been accounted for in the Basin Entrance Excavation calculations.

### *2.2 Upland Component of the Project:*

The upland component for this project is graphically defined in Appendix 4. Attention should be given to Sheets UC-1, UC-2A, and UC-3A to comprehend how the proposed project relates to the current site conditions. The upland component, generally defined as all those service areas, amenities, and recreational areas located inland of the Coastal Marshlands Protection Act jurisdictional line, that serve or augment the functioning of the marshlands component of the project, generally include the marina basin and perimeter bulkheads, wet slip marina within the basin, dry slip marina using open drystack racks, boat yard facility with travel lifts, and the confined dredge disposal facility. Refer to Appendix 21 for details pertaining to the “draft” Marina Operations and Maintenance Manual. Details associated with the upland component of the project are graphically defined in Appendix 2; Sheets 1 - 23 and discussed further below:

#### **Marina Basin Excavation and Bulkheads:**

The marina basin will be excavated from 9.36 acres of high ground running along the bank of the North River. The excavation will consist of the removal of ~425,000 cubic yards of material to varying depths ranging from -11.75 NAVD88 to -15.75 NAVD88 (-8.0 MLW to -12.0 MLW). The perimeter of the basin will be shored up by ~2,720 linear feet of bulkhead (a small amount of the 2,720 lf is “outside” the basin along the shoreline but upslope of the DNR line). The bulkhead design sections will vary depending upon the depth of the basin and the adjacent upland usage, but will primarily consist of steel sheet piling with a cast-in-place concrete cap with a rip rap revetment (3H:1V slope) at the toe of the wall. The majority of the basin will be excavated “in the dry” by maintaining the integrity of the existing shoreline at the North River, which will act as a dike or a “plug,” preventing the river water from directly entering into the excavated basin. The existing grades in the proposed basin footprint will be lowered consistently across the entire basin footprint.

until groundwater intrusion is regularly encountered. Once groundwater is regularly encountered, the basin will be kept as dry as practical through the use of perimeter ditches, pumps, and wellpoint systems. Once the volume of water within the basin can no longer be managed through ditching and pumping, the remainder of the basin shape will be excavated with long-reach backhoes and barge-mounted cranes using clamshells. Bulkhead construction will be coordinated with the excavation effort as necessary. Once the basin shape and final depths are completed, the water surface elevations on each side of the “plug” will be equalized, and the dike will be excavated from both land-based backhoes and a barge-mounted crane with clamshell, thereby making the physical connection to the river. The basin bulkhead will approach the river and make a return northward and southward, tying into the existing river bank, thereby creating the entrance channel feature. All portions of the bulkhead along the North River shoreline will be installed “upslope” from the DNR Line in an effort to avoid impacts. Refer to Appendix 3; Photo Sheets 1 & 2 which provide visual example of the finished basin bulkhead.

**Wet Slip Marina (within the marina basin):**

After marina basin construction, a floating dock system will be manufactured, shipped to the site, assembled, and launched into the basin, then anchored into place with steel pipe piles. The basin wet slips will consist of the following dock segments:

- **A Dock:** 32 wet slips ranging from 35’ to 40’ long, berthed onto a dock tree with an 8’-8” wide x 316’ long trunk, an 8’-8” wide x 83’-8” long tee-head, eight 4’-7” x 40’-2” finger docks, and seven 4’-7” x 35’-2” finger docks.
- **B Dock:** 33 wet slips at 50’ long, berthed onto a dock tree with an 8’-8” wide x 391’ long trunk, an 8’-8” wide x 108’-8” long tee-head, and fifteen 5’-4” x 50’-2” finger docks.
- **C Dock:** 32 wet slips ranging from 50’ to 70’ long, berthed onto a dock tree with an 8’-8” wide x 447’ long trunk, an 8’-8” wide x 138’-8” long tee-head, eight 6’-5” x 60’-2” finger docks, and seven 7’-4” x 70’-2” finger docks.
- **D Dock:** 9 wet slips ranging from 50’ to 70’ long, berthed onto a dock tree with an 8’-8” wide x 241’ long trunk, four 7’-4” x 70’-2” finger docks, and a 22’ x 24’-7” triangle dock



section.

- **E Dock:** 8 wet slips at 70' long, berthed on a 10'-8" wide x 288' long dock with two 7'-4" x 70'-2" finger docks.
- **Inner Fuel Dock:** Attached to D Dock by a 10'-8" x 60' connector dock is a 10'-8" wide x 80'-8" long fuel dock. The fuel dock will feature gasoline and diesel fuel dispensers as well as a sewage pumpout station. The fuel system will be designed with appropriate leak detection and safety shut-off technology.
- **Connecting Dock and Staging Docks:** A, B, C, and D docks are all connected by a common floating dock that runs along the basin perimeter, adjacent to the bulkhead. This dock is 8'-8" wide x 812' long, with a 4'-8" wide x 40' long access gangway. This connecting perimeter dock runs into an 8'-8" wide x 306'-4" long staging dock with a 7'-3" wide x 80' long ADA-compliant access gangway. East of the forklift dropwell is a second staging dock, 8'-8" wide x 487'-8" long, with two 4'-8" wide x 40' long access gangways, one at each end. These staging docks will be used in the drystack operations, temporarily staging vessels before launching and retrieval by the forklift.
- **Travel Lift Haulout Staging Dock:** East of the travel lift piers is a 10'-8" wide x 279'-4" long staging dock, to be used in the travel lift haulout operation. A 4'-8" wide x 40' long gangway provides access to this dock from the boatyard.

**Dry Slip Marina (using open drystack racks):**

- The proposed 304 dry slips are located at the northwest corner of the marina basin. The dry slip vessels will be housed in two outdoor rack systems: one at 37.5' wide x 303' long, the second at 47.5' wide x 328' long; a future expansion of the second outdoor rack will add an additional 25' in width over the 328' in length. Each rack system will be rooved and may be enclosed on three sides. The 34' x 34' pile-supported forklift dropwell structure will allow for launching of boats in two locations, facing east or facing south. The vessels will be temporarily staged on the aforementioned staging docks. The drystack operation will also include an office, restrooms, temporary washdown racks, fuel tanks, and an upland fuel-dispensing station. The fuel system will be designed with appropriate

leak detection and safety shut-off technology. The drystack operations area will be graded so that all wash down water is collected via a single storm drain. The wash down water will pass through an oil and water separator prior to being discharged into the marina basin.

**Boatyard Facility (with travel lifts):**

The Boatyard Facility will consist of a large open yard, approximately 410' long x 446' wide, for storing vessels during service, as well as a 190' wide x 345' long fully-enclosed boat repair building. Vessels will be lifted out of the water and placed on the ground using two marine travel lifts with capacities of 75 tons and 300 tons. Both travel lifts will share a launch slip, running along the adjacent bulkheads and sharing the center 8' wide x 60' long travel lift pier.

The Boatyard will be equipped with a wash down water recycling system located adjacent to the haul-out facilities. The wash down water recycling system enables wastewater from the wash down operation to be collected and reused through a closed loop pressure wash system. The system prevents the wash down water from mixing with rain / storm water, includes an above-ground separator that filters out solids and other materials harmful to water quality and aquatic organisms (e.g. heavy metals and toxins from bottom paint, VOCs, etc.) as well as UV treatment that sterilizes the water and eliminates pathogens (e.g. total and fecal coliform). If, for some reason, vessels in the boatyard cannot be washed at the wash down water recycling system, they will be pressure washed in the boatyard above filter fabric that collects solids and prevents them from entering the North River via stormwater runoff. The filter fabric will be disposed of as hazardous waste upon the completion of the wash down operation.

Following is a list of maintenance and repair activities that will be performed at the Boatyard, as well as the location(s) they will be performed and the best management practices (BMPs) and compliance standards that will be adhered to:

- Hull scraping and sanding
- Paint stripping
- Abrasive blasting
- Fiberglass Repair
- Bottom painting (anti-fouling paint)

- Hull and topside painting
- Varnishing and wood refinishing
- Electronic
- Degreasing / parts washing
- Engine work
- Propulsion work
- Zinc replacement
- Refrigerants

### **Confined Dredge Disposal Facility:**

To the northwest of the drystack facility will be a confined dredge disposal facility (CDF). This 5.2-acre plot will hold a diked disposal basin roughly 416' wide x 550' long. The CDF will be constructed using the suitable excavated material from the initial marina basin creation. Dikes will be constructed around the CDF, into which the future maintenance dredging material will be pumped from the marina basin. The dredged material will settle inside the CDF, with the effluent/runoff routed through a spillway structure and routed through existing stormwater infrastructure which ultimately discharges into the North River. The CDF will be sized to handle 56,000 cubic yards of dredging without being emptied. Based on the results of the basin sedimentation analysis, this CDF capacity would amount to approximately two dredge events occurring over a 10-year period. At such time that the CDF is full, the material will be mechanically excavated and hauled offsite, restoring the initial disposal basin capacity.

### **Marine Fuel System**

Fueling stations will be provided at three locations in the marina facility: at the drystack, at the Inner Fuel Dock, and at the Transient Docks.

The fuel system will be designed in accordance with the National Fire Protection Association's (NFPA) Automotive and Marine Service Station Code (NFPA 30A) and will feature appropriate leak detection, safety shut-off technology and fire protection. A Spill Prevention Control and Containment (SPCC) Plan will be prepared for the (4) 12,000-gallon Underground Storage Tanks (USTs) located in the drystack operations area, in accordance with 40 CFR 112.

Vessels stored in the drystack will be fueled while they are staged in yard racks in the operations area (as opposed to while temporarily berthed at the staging docks). All other vessels will be fueled in the water while they are securely berthed at the respective fuel dock.

An experienced operator will oversee vessel fueling at each fueling station. Fuel spill response equipment (e.g. absorbent booms, pads, etc.) will be stored and easily accessible at each fueling station.

### *Marine Sewage Pumpout System*

A state-of-the-art marine sewage pumpout station will be installed at the Wharf at St. Mary's in an effort to protect water quality in the marina basin, the North River and the overall St. Mary's River watershed. Fixed pumpout stations will be provided at the Inner Fuel Dock as well as at the fueling facilities on the Transient Docks. In the marina basin, Docks A, B, C, D and E will be equipped with an "in-slip" pumpout system. The "in-slip" pumpout system allows for vessels to empty their marine sanitation device (MSD) while they are securely berthed in their slip. Sewage pumpout "hydrants" are installed along the edge of the dock "trees" (similar to utility pedestals and fire suppression standpipes) and spaced so that up to four vessels can connect and discharge to one hydrant. Refer to the "Typical Floating Dock Cross Sections" in the permit application drawings for an illustrated view of a typical sewage pumpout hydrant. The fixed pumpout stations and the "in-slip" pumpout system will connect and discharge to the St. Mary's municipal wastewater collection and treatment system.

The marine sewage pumpout system will be available to vessels berthed at the marina (short and long-term) as well as to the general boating public.

The applicant intends to seek Clean Vessel Act funding to offset a portion of the costs of the marine sewage pumpout system. The Clean Vessel Act (CVA) of 1992 was signed into law to reduce pollution from vessel sewage discharges, prohibiting the discharge of raw sewage into fresh water or within coastal salt-water limits. The act established a federal grant program administered by the

U.S. Fish and Wildlife Service, which to date has awarded nearly \$150 million for states to install thousands of sewage pumpout stations.

### *2.3 Marshlands Buffers for Upland Component:*

This project is a redevelopment of a demolished paper mill site; therefore, there are no undisturbed buffers adjacent to the North River. Appendix 1 is provided to document the existing site conditions and the photo essay is used to observe progression of the site since 2003. Appendix 2 defines the 50' upland buffer measured from the jurisdictional boundary and the limited development, i.e. walkway, proposed within the buffer area. Appendix 4; Sheets UC-1, UC-2A, & UC-3A define how the proposed project relates to the current site conditions. Appendix 5 addresses storm water management, speaks to the existing site conditions and the post construction improvements that are planned within the 50' upland component buffer.

During construction, the buffer area located east of the boatyard and north of the basin entrance will be used to install the fixed walkway leading to the in-water features, and to transport and place supplemental rip rap on the face of the existing revetment along the river to help stabilize the slope. Refer to Appendix 2; Sheet 12, cross-sections A-A & B-B for details.

The buffer area located east of the marina store and south of the marina entrance will be used to install the new bulkhead located upland of the jurisdictional boundary and to place rip rap at the toe of the new bulkhead to help stabilize the bulkhead and protect this area from scouring. Refer to Appendix 2; Sheets 8, 9, & 11 for details.

Post construction of this project, the 50' buffer areas will be manipulated to remove the existing remnant mill debris and enhanced, as outlined in Appendix 5. The only permanent structures to remain within the buffers are the sidewalk leading to the boatyard docks and the new bulkhead located north and east of the marina store.

### *2.4 Storm water Management Plan of the Upland Component:*

Refer to Appendix 5 for details relating to the storm water management summary, existing conditions, post development conditions, and paving grading and drainage concept layout.

### *2.5 Pervious / Impervious Surface Calculations of the Upland Component:*

Refer to Appendix 5 for details relating to the storm water management summary, existing conditions, post development conditions, and paving grading and drainage concept layout.

3. **DEED INFORMATION**

Appendix 8 provides the property deed, owner acknowledgement letter dated 14 May 2018, Bylaws of Camden County Joint Development Authority, 31 July 2017 purchase and sales agreement, and the First Amendment to Purchase and Sales Agreement dated 30 April 2018.

4. **ADJOINING LANDOWNERS**

A list of adjoining landowners and their addresses is attached in Appendix 9.

5. **ZONING AND LANDFILL/HAZARDOUS WASTE STATEMENT**

On 26 March 2018, ESI prepared letters to contact the appropriate City of St. Mary's officials regarding zoning and hazardous waste / landfills in the project area. In the letter dated May 11, 2018 City Manager Mr. John J. Holman confirmed the project is in accordance with the approved PD text and zoning ordinance. In the letter dated June 4, 2018 Mayor John. F. Morrissey reports city records do not reveal any landfills or hazardous waste site exist on site. (Appendix 10 & 11 respectively).

It should be noted that recent environmental site investigations have indicated that soil in limited areas within the proposed project boundary have been impacted because of previous site use. The project area is qualified to be entered into the Georgia Brownfield Program as promulgated by the Georgia Brownfield Act (O.C.G.A 12-8-200). Additional investigation and remediation will be conducted within the project area as required by the Georgia Environmental Protection Division (EPD) Response and Remediation Program Brownfields Unit. Site redevelopment will not begin until the Georgia EPD has certified that the site is in compliance with the approved risk reduction standards and any applicable Activity and Use Limitations.

Terracon Consultants, Inc. completed the above referenced Due Diligence Limited Site Investigation October 4, 2017. The full results of that investigation are included in Appendix 12.

6. **DESCRIPTION OF ALTERNATIVES & MINIMIZATION OF IMPACT MEASURES**

### 6.1 Alternatives:

Appendix 17 provides three earlier site plans conceptualizing this project. Each plan is generally similar in that a basin is excavated in uplands, a basin entrance to the North River must be constructed, and in-river dockage is also needed to accommodate vessels associated with the boatyard facility and transient accommodations.

Considering the existing site conditions, no freshwater wetlands exist on site; therefore, the project represents complete avoidance of any wetlands regulated by the Clean Water Act.

As depicted on the earlier plans, the basin configuration and basin entrance has changed over time. To minimize project impacts, Wetland Environment Consultants (WEC) was engaged to review the concept plans and model the existing conditions in the North River to provide design input for the project. As such the basin configuration and basin entrance was finalized as defined in Appendix 2. Appendix 14 provides the WEC water quality and sedimentation analysis which draws reasonable conclusions for this project. Minimization efforts resulting from this analysis include an overall reduction of the basin entrance excavation area.

Further minimization efforts have been employed which include limited permanent impacts to the 50' upland component buffer, installation of the marina store bulkhead upslope of the jurisdictional boundary, and limiting the new rip rap at the toe of this bulkhead.

No additional minimization options exist that would also allow the project to be constructed as proposed.

### 6.2 No-Build Alternative:

A no-build alternative would result in the subject site remaining in the abandoned, underutilized condition as it has been since the Durango Paper Company bankruptcy. A no-build alternative does not meet the purpose and need for this project.

## 7. EROSION AND SEDIMENTATION STATEMENT

*Pursuant to CESAS Form 19; Question 16, B: 1,2,3.*

- 1) All activities will be performed in a manner to minimize turbidity into river.
- 2) No oils or other pollutants will be released from the proposed activities which will reach the river.

- 3) All work will be performed in a manner necessary to avoid interference with any legitimate water uses.

**8. PUBLIC INTEREST STATEMENT**

The proposed construction, outlined elsewhere in these materials, has been designed to meet the specific project purpose, while minimizing adverse impacts to the surrounding ecosystems wherever possible. In this application, documentation has been provided to discuss how the project is not contrary to the public interest, and the following public interest considerations are discussed:

*Pursuant to the Coastal Marshland Protection Act 12-5-286. (12)(g):*

- a. *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.*

Site data collected and used in this application clearly defines the existing site conditions. The river at the project location ranges between 277' to 380' wide. The proposed boatyard dock occupies ~ 38% of the waterway and the transient dock occupies ~34% of the waterway. Appendix 2; Sheets 6 & 8 provide detail of the docks in association with the current bathymetric survey of the North River. As depicted, the depth of the river at the dock locations satisfy depth requirements for this project. As depicted, the depth of the river east of the outboard docks and across the remaining portion of the river range between -12' to -15' deep and ~150' to ~200' wide. These conditions provide ample room for safe navigation past the proposed project. Therefore, there will be no unreasonable harmful obstruction to or alteration of the natural flow of navigational waters.

- b. *Whether or not unreasonable harmful or increased erosion, shoaling of channels or stagnant areas of water will be created.*

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The project is located along a relatively straight section of the North River. The configuration of the docks and piles allows the current to continue to run parallel to the shoreline. As discussed in the WEC analysis provided in Appendix 14, the basin entrance will not result in any increased erosion or shoaling within the North River. Additionally, as reported in the WEC analysis, a 2- to 4-day flushing time is generally considered satisfactory. The designed basin results in the estimated flushing time of 2.9-days, thereby avoiding any stagnated areas of water. Therefore, no unreasonable harmful or increased erosion, shoaling of channels or stagnant areas of water will be created.

- c. *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, wildlife, or other resources, including but not limited to water and oxygen supply.*

The proposed project will employ Best Management Practices in accordance with local, state, and federal regulations.

As outlined in the WEC report in Appendix 14, flushing times of 2.9-days meets the standard and avoids issues with oxygen supply.

As outlined in the Conservation Measures Section 11 in this document, and the "Sample" education materials defined in Appendix 20, conservation of marine life and other resources will be employed and made part of the daily operations of this project.

Furthermore, to understand the current site conditions, Terracon Consultants, Inc. were employed to continue site investigations. Appendix 12 provides details associated with the Due Diligence Limited Site Investigation dated October 4, 2017. The recent environmental site investigations have indicated that soil in limited areas within the proposed project boundary have been

impacted as a result of previous site use. The project area is qualified to be entered into the Georgia Brownfield Program as promulgated by the Georgia Brownfield Act (O.C.G.A. 12-8-200). Additional investigation and remediation will be conducted within the project area as required by the Georgia Environmental Protection Division (EPD) Response and Remediation Program Brownfields Unit once the CMPA and Federal permits are acquired. Site redevelopment will not begin until the Georgia EPD has certified that the site is in compliance with the approved risk reduction standards and any applicable Activity and Use Limitations.

Lastly, Terracon Consultants, Inc. were employed to prepare a Groundwater Modeling Report once the basin configuration and basin wall (bulkhead) design were finalized. Appendix 13 provides details associated with the Groundwater Modeling Report dated June 12, 2018. Page 15, **Section 5 Summary and Conclusions** state “The results of the model indicate contaminants will not impact the open basin marina based on the modeled bulkhead wall design”.

Therefore, using appropriate redevelopment standards consistent with BMP’s and regulatory obligations, this project as proposed will not unreasonably interfere with the conservation of fish, shrimp, oysters, crabs, clams, or other marine life, wildlife, or other resources, including but not limited to water and oxygen supply.

## 9. LISTED SPECIES

Protection of listed species is provided by the Endangered Species Act for both private and public lands, regardless of permitting needs. For species listed by the State of Georgia as rare, unusual, or in danger of extinction under the Endangered Wildlife Act, the state's jurisdiction is limited to the capture, killing, selling, and protection of suitable habitat of protected species on public land. For plants listed by the state as rare, unusual, or in danger of extinction under the Wildflower Preservation Act, jurisdiction is also limited to those species found on public land.

Species of Management Concern (SMC) are not being evaluated, because they have no federal listing, so therefore are not legally protected. Since this parcel does not contain public lands, the listed species review focused only on the federally listed species with ranges in Camden County, Georgia.

The majority of the ~53-acre is upland and was formerly part of a papermill that operated for nearly 50 years. After declaring bankruptcy and several changes in ownership, demolition began in the late 2000's, and has continued intermittently until present day. Due to the site's current condition containing a mass amount of urban debris and its prior use as a papermill, most upland dependent listed species are not anticipated to occur within the project site. For this reason, several of the species listed as potentially occurring in Camden County are not anticipated to occur within the project site, including eastern indigo snake (*Drymarchon corais couperi*), gopher tortoise (*Gopherus polyphemus*), striped newt (*Notophthalmus perstriatus*), and beach/shorebirds [piping plover (*Charadrius melodus*) and rufa red knot (*Calidris canutus rufa*)].

ESI has spent a substantial amount of time on site and have reviewed available printed material for current listed species. Refer to Appendix 19 for U.S. Fish and Wildlife IPaC data. Compilation of this data revealed the list of species identified to occupy habitats similar to those found on or near the project site as listed below in Table 2, along with a brief description and statement about their potential for occurrence.

**Table 2.** Listed species classified as Threatened or Endangered for Camden County, GA

Species	Federal Status	Habitat	Threats	Potential Habitat Present	Project Potential for Impacts	Biological Opinion
<b>Bird</b>						
Wood stork <i>Mycteria americana</i>	T	Primarily feed in fresh and brackish wetlands and nest in cypress or other wooded swamps.	Decline due primarily to loss of suitable feeding habitat, particularly in south Florida. Other factors include loss of nesting habitat, prolonged drought/flooding, raccoon predation on nests, and human disturbance of rookeries.	No	None	No Effect

Mammals						
<b>West Indian Manatee</b> <i>Trichechus manatus</i>	T	Live in marine, brackish, and freshwater systems in coastal and riverine areas.	Habitat loss, boat collision, entanglements in fishing gear	Yes	Low <sup>1</sup>	May Affect – Not Likely to Adversely Affect
<b>North Atlantic Right Whales</b> <i>Eubalaena glacialis</i>	E	Mostly found along the Atlantic coast of North America. Nursery in shallow coastal waters	Ship collisions, fishing gear entanglement, habitat degradation, contaminants, climate change, noise	Yes	Low <sup>1</sup>	May Affect – Not Likely to Adversely Affect
Reptile						
<b>Green Sea Turtle</b> <i>Chelonia mydas</i>	T	Shallow waters inside reefs, bays, inlets; rarely found in open ocean. Nest in open beaches with minimal disturbance.	Loss of nesting habitat, commercial harvest, disease, marine pollution, watercraft strikes, incidental capture	Yes	Low <sup>1</sup>	May Affect – Not Likely to Adversely Affect
<b>Leatherback Sea Turtle</b> <i>Dermochelys coriacea</i>	E	Open ocean, forage in coastal waters and offshore.	Incidental capture, marine pollution, commercial harvest	Yes	Low <sup>1</sup>	May Affect – Not Likely to Adversely Affect
<b>Loggerhead Sea Turtle</b> <i>Caretta caretta</i>	T	Feed in coastal bars/estuaries and shallow water along the continental shelf.	Loss of nesting habitat, incidental capture	Yes	Low <sup>1</sup>	May Affect – Not Likely to Adversely Affect
Fish						
<b>Shortnose Sturgeon</b> <i>Ambystoma cingulatum</i>	E	Hatch in freshwater rivers, and spend most of their time in coastal waters, spending little time in the ocean.	Overharvesting, bycatch of sturgeon in fisheries targeting other species, poor water quality, habitat degradation/loss from dams, dredging, etc.	Yes	Low <sup>1</sup>	May Affect – Not Likely to Adversely Affect
<b>Atlantic Sturgeon</b> <i>Acipenser oxyrinchus oxyrinchus</i>	E	Hatch in freshwater rivers, head out to sea as juveniles, and spend most of their time in coastal rivers. In Georgia,	Overharvesting, bycatch of sturgeon in fisheries targeting other species, poor water quality, habitat degradation/loss from dams, dredging, etc.	Yes	Low <sup>1</sup>	May Affect – Not Likely to Adversely Affect

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		they return to their birthplace to spawn during later summer/fall. Adults migrate and forage along the coast in estuaries.				
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<sup>1</sup> Low was assigned to all those species that could not be completely eliminated as potentially utilizing the property or nearby waters in some regard. In this case all of these species were assigned a Biological Opinion of May Affect – Not Likely to Adversely

Suitable foraging for wood storks exist in close proximity to the project site. In addition, a wood stork rookery exists within the former 723-acre Durango Papermill Tract, approximately 1-mile northwest of the current ~53-acre parcel. Although wood storks could fly over the site, given the fact that this site does not offer any unique habitat for this species, the likelihood of the project negatively affecting this species is low. Existing features within the 1-mile separation of the Wharf St. Marys and the rookery are several physical barriers, including thick vegetation and earthen berms, that shield from visual and noise disturbances. It should also be noted that this colony of wood storks has existed since 1998, when the papermill was still in full operation (until Fall 2002). After the bankruptcy, work continues on site for demotion purposes. Therefore, it is assumed individuals were / are acclimated to high levels of human activity. Activities associated with this project are not anticipated to affect this species.

The St. Mary’s River has been recently designated as critical habitat for Atlantic Sturgeon, along with the other coastal rivers throughout Georgia; however, this project is located upstream of the St. Mary’s River, on the North River, therefore this has no affect any critical habitat. Sturgeon *may* utilize the North River only for foraging, growth, resting, staging, and holding; as confirmed from NOAA. NOAA also revealed that “the limited work done in the St. Mary’s River suggested that sturgeon move lower in the river in winter and back upstream in the summer, therefore it would be less likely, to very unlikely, to encounter sturgeon during in-water work from June – October”. Therefore, the applicant proposes for most of the in-water work to be completed between this timeframe. When in-water work is occurring, the main mitigative measure is the use of noise attenuation techniques. All steel piles will be driven with a vibratory hammer, which reduces the amount of underwater noise. For other pile materials, such as concrete, a diesel impact hammer will be utilized. Pile driving will begin with a slow deployment / slow start technique.

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which helps to encourage the movement of any wildlife away from the construction area before constant pile driving commences. The proposed measures mentioned herein, should mitigate for the potential effect on wildlife, including sturgeon and the critical habitat designation located in the St. Mary's River ~ 2-miles downstream.

The marine species listed in Table 2, can/do occupy the waterways proximate to the project and within the Atlantic Ocean located ~7.5 river miles to the east. Boats originating from the marina have a potential for encountering these marine species during their trips. Therefore, several general mitigative measures are being discussed to avoid unreasonable interference with wildlife conservation. These concepts include but are not limited to:

- Coordination with the resource agencies to access the current educational materials and develop a project specific education plan to be used by the patrons. Examples of such plans, signs, and brochures can be found in Appendix 20.
- Adherence to Camden County Code Section 70-6, designating the North River as a no-wake zone. Idle and/or slow boat speeds can help avoid boat strikes with manatees, right whales, and sea turtles.
- Educational signs that will help increase awareness of this Camden County code are proposed, in addition to any species-specific no-wake zone/slow speed signs the resource agencies may suggest.
- Initial construction of the facility and future maintenance dredging of the basin, will employ normal Best Management Practices (BMPs) and utilize appropriate seasonality windows to perform these activities.

## **10. CULTURAL RESOURCE ASSESSMENT**

Summary/partial cultural resource evaluation data is provided in Appendix 18, In March 2007, Environmental Services, Inc. (ESI) performed an intensive cultural resource assessment survey of the ~723-acre tract of the LandMar/Durango Paper Mill parcel, which included the current +/- 53-acre site. A Phase 1 Report was finalized in February 2008 which outlined the methodologies and findings from the archaeological surveys conducted. The goal of the surveys

was to locate, identify, delineate, and evaluate all historic properties within the parcel, including prehistoric and historic archaeological sites, as well as historic structures. The cultural resource assessment survey included a pedestrian inspection combined with systematic shovel testing at 30 and 90-meter intervals.

As a result of the 2007 survey, one historic period archaeological site was located (9CM459), that was not considered eligible for inclusion in the *National Register of Historic Places* (NRHP), based upon the results of field investigations. Site file consultation indicated that there were no previously recorded sites within the property; however, there were 39 previously recorded archaeological sites and/or historic structures, primarily residences within the St. Mary's historic district, documented within a one-mile radius of the property. Furthermore, there were numerous structures greater than 50 years of age associated with the former Gilman Paper Company/Durango Paper Mill and Manufacturing Complex (9CM460), which was then located within the southeastern portion of the 723-acre property, and is now part of the current +/- 53-acre site. Since the time that field investigations were completed, the paper mill complex was dismantled/demolished as a result of bankruptcy proceedings against the prior owner. Based on the results of the 2007 field investigations and 2008 Phase 1 site assessment, no further cultural resource considerations were recommended for the 723-acre property.

As part of the proposed LandMar/Durango Paper Mill community dock development associated with USACE Application, Regulatory No. 2006-02277, Dr. Brian Marks of ESI sent a letter dated 13 February 2008 to Dr. Jeff King of the U.S. Army Corps of Engineers (CE), Savannah District, requesting a determination of the need for an archaeological remote sensing survey. In response to this letter, an email was received from Mr. Jeff King dated 2 April 2008, recommending that a low water survey of the river bank/intertidal area and a remote sensing survey be conducted of submerged areas. In response to this letter, ESI initiated a meeting in May 2008 with the CE to determine scope of this request, during which ESI provided additional information. This additional information lead to a determination by CE that no remote sensing would be necessary.

Since a Phase 1 Report was completed prior to site demolition, and the CE confirmed that no in-water surveying or remote sensing would be necessary for the LandMar community dock (Regulatory Branch# 2006-02277), ESI believes that no further cultural resource assessments are necessary, in relation to the currently proposed project, known as Wharf St Marys.

**11. CONSERVATION MEASURES**

As noted elsewhere in this application, the applicant has taken various steps to minimize environmental impacts and create a development that is a viable business venture as well as a project that would complement Camden County.

These measures include:

- a) Re-development of an already impacted waterfront with a reduced footprint.
- b) Proposing construction of only 2 minimal in river structures.;
- c) Reduce the number of fixed piers constructed to provide access to the floating dock system.
- d) Negate marsh shading by using areas void of marsh vegetation.
- e) Limit in river marina structures by proposing inland boat basin.
- f) Use of construction material suitable to the environment for which they are proposed.
- g) The implementation of standard threatened and endangered species educational materials, both temporarily during construction and permanently after construction.
- h) Utilizing pile driving techniques that decrease potential disturbance to threatened and endangered species.
- i) The implementation of an education program to inform users of the North River no-wake Camden County ordinance.
- j) Provide public access giving these structures dual use.
- k) Improve existing revetment to prevent future erosion.
- l) Restoration of the upland riverbank interface providing a buffer where none currently exists.
- m) Compilation of a Marina Operations and Maintenance Manual.



- n) Implement Clean Marina Best Management Practices and other Best Management Practices during the construction of the water access structures and associated development, to avoid turbidity and siltation in adjacent marshes and waterways.
- o) Implement monthly maintenance of dock apparatus' capable of producing a stream of fresh water and have a contingency plan for emergency repairs of any freshwater source.
- p) Provide pump out stations.

## 12. PURPOSE AND NEED STATEMENT

The Purpose and Need Statement is to satisfy 404 (b) (1) Guidelines and public interest review (33 CFR 320.4). The purpose of the project is to construct a full-service marina facility to serve public and private interests. The need for this project is driven by several factors, these include:

- Residents in Camden County have limited facilities that provide for public access to the water and suitable wet and dry storage. Recent Hurricanes Matthew and Irma have decimated the in-water facilities located in St. Mary's, further limiting suitable water access and use. Appendix 7 provides pre/post aerial documentation of this hurricane destruction.
- Transient boaters have limited opportunities for mooring while visiting the St. Mary's area.
- A large vessel manufacturer is seeking to locate a new facility in this region to expand operations.
- The proposed project stimulates economic development in this area.

## 13. Needs Assessment

Pursuant to The Rules of the Department of Natural Resources, Chapter 391-2-3-.03(6)(c.), Coastal Marshlands Protection, the following information is provided to demonstrate the need for this project.

As stated earlier in this application, the ~53-acre project is a portion of a 723-acre parcel formally occupied by a paper mill. Originally operated by Gilman Paper Company, following by Durango Paper Company, the site also represented the largest private employer in the county. Closure of the mill significantly affected the unemployment rates and has continued to negatively

affect growth of this area. For years, the bankruptcy trustee has been courted by prospective users of the site. To date, none have committed to a formalized redevelopment plan as that proposed by this project.

Wharf St. Marys represents the first viable project to seriously pursue appropriate entitlements on site representing significant opportunities for the local boating community, transient vessel operators, increased tourism by providing a destination location for transient boaters, and commercial opportunities associated with the boatyard and boatyard dock facilities. Additionally, site improvements also enhance local retail, restaurant, residential, and commercial interests.

During the planning process, the applicant employed CBRE Valuation & Advisory Services to prepare a feasibility study for Wharf St. Marys. The feasibility study is found in Appendix 6. The study goes into extensive detail addressing all aspects of the proposed project and the appropriateness of a project like this being in St. Mary's, Ga. Starting on Page 77 of this study, the conclusion reveals satisfaction of five criteria:

- Economic feasibility;
- Market feasibility;
- Technical feasibility;
- Financial feasibility; and,
- Management feasibility.

In summary, the CBRE provides sufficient detail to demonstrate the need and benefits of this project.

In addition to the above referenced CBRE feasibility study, Appendix 7 – Pre/Post Hurricane Exhibits; Figures 1, 2, & 3 provide an aerial view of the St. Mary's riverfront pre/post Hurricane Irma. Figure 1 provides a March 2017 aerial of the riverfront and identifies the owners/operators of the facilities labeled A thru G. Figure 2 provides an October 2017 aerial of the riverfront following the devastation of Hurricane Irma. While anecdotal information suggests some of these facilities are attempting to rebuild, others may unfortunately never recover. Figure 3 provides a general understanding of the location and relationship of Wharf St. Marys to the St. Mary's riverfront. Additional information depicts the waterway geometry of the St. Mary's River

compared to that of the North River. Protection provided by the saltmarsh located south and east of the proposed project can also be observed. As defined on Figure 3, the St. Mary's River is a much larger waterway. While the larger waterway offers several advantages over smaller waterways, when considering the "fetch" from a southeast direction, the St. Mary's River has a ~6,300' fetch vs. the North River ~1,400' fetch. When storm events occur, the longer fetch correlates to higher wind and wave energy which has the potential to cause more damage as seen in the St. Mary's River example. Couple the shorter fetch provided at the North River, along with the protection offered by the inland basin, the proposed project will provide a safe harbor for residents and transient boaters in the future.

Additional demonstration of need for this project is revealed through recent discussions with the Cumberland Harbour Property Owners Association. Cumberland Harbour is ~1,014-acre residential community located approximately 1-mile directly east of the proposed project. Planning for Cumberland Harbour began in 2002. Along with the residential component of this project, Cumberland Harbour included the development of the Cumberland Harbour Yacht Club within the North River, the South Point Village Marina within the St. Mary's River, three day-docks within Pt. Peter Creek, and up to ~92 residential docks originating from the residential lots. The permit for the in-water portion of this project was issued in December 2009. Given the economic challenges during this period, the original developer lost the property to the lender and numerous other entities have attempted to develop the water access as planned. The original permit was issued a 5-year extension in ~2014 extending the permit life to December 2019. Recent approach to the applicant for Wharf St. Marys by the Cumberland Harbour POA revealed there are no plans to proceed with development of either marina at Cumberland Harbour. As a result, the POA inquired about the residents at Cumberland Harbour being able to utilize facilities planned at Wharf St. Marys. As planned, Wharf St. Marys is a public/private facility and it welcomes the ability to accommodate the needs of the Cumberland Harbour residents.

The project team believes the information provided in this application clearly demonstrates the need for this project in St. Mary's, Camden County, Ga.