1.0 INTRODUCTION & BACKGROUND:

The Ford Field & River Club (owner/applicant) is requesting permit authorization for activities associated with the bank stabilization along the upstream and downstream end of an existing canal and water control structure located south of Lake Clara within The Ford Field & River Club in Bryan County, Georgia (31.927805°, -81.277390°).

2.0 PROJECT PURPOSE:

While the existing structure is sound and does not require modification or maintenance, the upstream and downstream bank of the existing canal has experienced continued erosion. The purpose of the project is to install rip rap along the bank for erosion control purposes to prevent further erosion and protection of the existing structure.

3.0 JUSTIFICATION STATEMENT:

The proposed project is necessary to stabilize the eroding banks upstream and downstream of the existing canal structure and prevent continued loss of bank material. Installation of riprap will provide long-term erosion protection while maintaining the integrity of the existing structure and surrounding canal banks.

4.0 PROPOSED PROJECT:

The proposed bank stabilization totals approximately 3,078 square feet (0.07 acre). No vegetated marshlands will be impacted by the project. Filter fabric will be placed along the exposed bank within the project limits prior to placement of the revetment material. Following installation of the fabric, approximately 342 linear feet of the bank, including 62 linear feet upstream of the structure and 180 linear feet downstream of the structure, will be stabilized with 171 cubic yards of rip rap. The fabric and rip rap and/or broken concrete will be placed along the bank using a combination of manual labor and an excavator operating from uplands or a barge within the canal. All work will occur along the existing bank above mean low water. Table 1. Provides a summary of the bank stabilization activities.

Table 1. Bank Stabilization Summary

Location	Material	SY	SF	AC	CY	Linear Footage
Site N	RIP RAP/BROKEN CONCRETE	62	558	0.01	31	62
Site O	RIP RAP/BROKEN CONCRETE	280	2520	0.06	140	280
	Total	**342**	**3078**	**0.07**	**171**	**342**

In addition to the information above, the current condition of the project area is addressed in the attached Technical Memorandum prepared by Pittman engineering and photographs of the project area are provided in pages 38-42 of the report.

4.1 Marshlands Component:

The marshlands component of the project is defined as the part of the project in an estuarine area or any structure on or over an estuarine area, including but not limited to marinas, community docks, bridges, piers and bulkheads requiring a permit under the Coastal Marshlands Protection Act. The marshlands component of the project is the 2520 square feet area below the Coastal Marshlands Protection line where the riprap will be installed.

4.2 Upland Component:

The upland component of the project is defined as all those service areas, amenities and recreational areas located inland of the Coastal Marshlands Protection Act jurisdiction line, that serve or augment the functioning of the marshlands component of the project such as, but not limited to, dry stack boat storage, dock master shop, fuel storage and delivery facilities to serve the marshlands component of the project. The upland component consists of the upland area along the bank of the canal. No changes to the upland component are proposed.

4.3 Stormwater Management:
The proposed project does not include upland site development activities and development of a stormwater management plan is not required. The project will implement standard BMP's during the construction phase for sedimentation and erosion control purposes and to protect adjacent tidal waters and marsh.

4.4 GADNR-EPD 401 Water Quality Certification (WQC): By letter dated December 15, 2020, the Georgia Department of Natural Resources, Environmental Protection Division (Georgia EPD) issued a conditional Water Quality Certification for use all of the NWPs in Georgia, pursuant to Section 401 of the Clean Water Act. For this reason, 401 certification will be obtained as part of the U.S. Army Corps of Engineers Nationwide Permit verification.

5.0 ALTERNATIVES ANALYSIS AND MINIMIZATION:
The proposed project includes stabilization of a canal bank associated with an existing outfall structure. The project design avoids and minimizes impacts to the greatest extent practicable by limiting the proposed disturbance to the minimal necessary to stabilize the bank to prevent future erosion.

6.0 ESSENTIAL FISH HABITAT:
The proposed project includes the installation of 300 CY of riprap. While the project area contains essential fish habitat, due to the scope and minimal impacts associated with the maintenance activities, the project will not adversely affect essential fish habitat.

7.0 THREATENED AND ENDANGERED SPECIES:
Coordination with US Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) was conducted to assess potential impacts to federally protected species on the project site. The results of this consultation are attached to this document. In addition to the database query, a pedestrian survey was conducted on-site, and no federally listed species were observed. The following provides a brief description of each species listed as threatened or endangered.

Tricolored Bat (Perimyotis subflavus)
The tricolored bat is a small species of bat that is yellowish brown in color with pink forearms and black wings. Each individual hair is "tricolored", giving the species its name. They have rounded ears and a short and blunt tragus. Total length is 40-48 mm (1.75 in), the forearm length is 31-35 mm (1.25 in), and the weight is 3-6 g. The calcar is not keeled. The winter roosts are composed of caves, mines, cavelike tunnels, trees, or roadway culverts. Summer roosts are mainly in dead or live tree foliage, but may also be in caves, mines, rock crevices, bridges, and culverts. This species also typically roosts within riparian areas.

The project site does contain habitat (canopy trees) which could support this species. Because this species is currently proposed for listing as endangered and considering the size and location of the project site, it is our opinion that future land use changes or development are not likely to adversely affect the long-term sustainability of this species.

West Indian Manatee (Trichechus manatus)
The West Indian manatee is a large aquatic mammal whose habitat consists of warm coastal and spring fed waters. It is listed as endangered under both its state and federal status. They are large, gray aquatic mammals with bodies that taper to a flat, paddle-shaped tail. They have two forelimbs, called flippers, with three to four nails on each flipper. Their head and face are wrinkled with whiskers on the snout. During winter months these mammals are primarily confined to the coastal waters of the southern half of Florida and the spring fed rivers of Florida and Georgia. During the summer months as the water temperature rises, the manatees' range expands as far north as Virginia and it is during these months that the "manatees" may occasionally utilize the estuaries of coastal Georgia. Critical habitat for this species has been identified as large portions of coastal Florida including the St. Mary's River.

While the project site contains habitat known to support the manatee, the proposed project will comply with the Savannah District Manatee Special Conditions; therefore, the proposed project may affect but is not likely to adversely affect this species.

Eastern Black Rail (Laterallus jamaicensis ssp. Jamaicensis)

The Eastern black rail is a small bird living in salt and freshwater marshes in portions of the United States, Central America, and South America. Males and females are similar in size and adults are generally pale to blackish-gray, with a small blackish bill and bright red eyes. Eastern black rail habitat can be tidally or non-tidally influenced, and range in salinity from salt to brackish to fresh. Tidal height and volume vary greatly between the Atlantic and Gulf coasts and therefore contribute to differences in salt marsh cover plants in the bird's habitat. Diet includes Insects, snails, seeds, etc. Loss of habitat is the main threat to this species however where habitat is projected numbers are likely stable.

The project area associated with the proposed stabilization consists of open water and does not contain salt marsh habitat required for the eastern black rail. Therefore, this project is not likely to adversely affect this species.

Wood Stork (Mycteria americana)

The wood stork was listed endangered by the USFWS on 28 February 1984 (Federal Register 49 (4):7332-7335). It is listed as endangered under both its state and federal status. Wood storks use freshwater and estuarine wetlands as feeding, nesting, and roosting sites, and annual population fluctuations are closely related to the year-to-year differences in the quality and quantity of suitable habitat. The overall decline in wood stork numbers is attributed to the loss or degradation of essential wetland habitat primarily in southern Florida. The adult is a large bird 33-45 inches tall and 58-71 inches in wingspan. Males typically weigh 5.5-7.3 lbs; females weigh 4.4-6.2 lbs. They appear all white on the ground, with blackish-gray legs and pink feet. In flight, the trailing edge of the wings is black. The head is dark brown with a bald, black face, and the thick down curved bill is dusky yellow. Juvenile birds are a duller version of the adult, generally browner on the neck, and with a paler bill. They nest colonially with up to twenty-five nests in one tree. Breeding once a year, a female lays 3-5 eggs in the typical clutch. The eggs are incubated 27–32 days by both sexes.

The project area associated with the proposed stabilization consists of open water tidal habitat within an existing canal. While this resource could provide feeding habitat for this species, the project includes only minimal impact along the banks of the existing canal. For this reason, this project is not likely to adversely affect this species.

Eastern Indigo Snake (Drymarchon corais couperi)

The Eastern indigo snake is a large nonpoisonous, stout bodied snake averaging six to seven feet in length. The snake is smooth scaled and uniform glossy blue-black throughout its body except for some reddish orange or cream color suffusion on its throat, cheeks and chin. This coloration varies with some individuals having distinct coloration and others with no coloration. In the extreme southern reaches of its range (South Florida), the snake is less restricted and inhabits flatwoods, tropical hammocks, dry glades and moist bogs. In this region of its range, overwintering sites include tree stumps and other underground dens. In the northern portion of its range, including south Alabama, the indigo snake requires deep sand ridges and is often associated with the gopher tortoise. The indigo snake is dependent upon the deep burrows dug by the gopher tortoise and uses them as a refuge from the extreme hot and cold temperatures. This restricted habitat is even more isolated by the snakes' preference for the interspersion of wet lowlands and cypress ponds.

Habitat required to support this species is not present within the project area and the proposed project will have no effect on the eastern indigo snake.

8.0 COMMERCIAL BAIT SHRIMP, OYSTER, AND CRABBING AREAS

The proposed project is not located in a designated bait shrimp zone according to Georgia Department of Natural Resources *Commercial and Recreational Bait Shrimp Zones, Coastal Georgia* map. The project area is not listed on the *Georgia Harvester Reported Crabbing Areas* list, and the project area is not located in designated commercial or recreational oyster harvest areas.

9.0 IMPAIRED WATERS

The subject waterway is not listed on the U.S. Environmental Protection Agency 303(d) list for impaired water bodies.

10.0 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.

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

- ***The name and address of the applicant-***
  See attached application form

- ***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-*** Please refer to attached permit drawings.

- ***A plat of the area in which the proposed work will take place-*** See attached.

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

- ***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 for 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-*** See attached.

- ***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 in violation of any zoning law;*** A request has been submitted to the City of Richmond Hill and a copy of that request is included in this package. The response from Richmond Hill will be provided upon receipt.

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

- ***A description from the applicant of alternative sites and why they are not feasible and a discussion of why the permit should be granted-*** Addressed above.

- ***A statement from the applicant that he has made inquiry to the appropriate authorities that the proposed project is not over a landfill or hazardous waste site and that the site is otherwise suitable for the proposed project-*** A review of the Hazardous Site Index for Bryan County, Georgia indicates that the subject property does not contain hazardous waste sites or landfills. A copy is attached.

- ***A copy of the water quality certification issued by the department if required for the proposed project-*** Addressed above.

- ***Certification by the applicant of adherence to soil and erosion control responsibilities if required for the proposed project-*** The project will conform to all building, land disturbing, and stormwater management requirements of the City of Richmond Hill.

- ***Such additional information as is required by the committee to properly evaluate the application-*** This application has been prepared with consideration for the interests of the general public of the State of Georgia as defined in OCGA 12-5-286(g):

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

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

(1) Whether or not unreasonably harmful obstruction to or alteration of the natural flow of navigational water within the affected area will arise as a result of the proposal- The proposed project does not include any structure or obstruction in areas that are navigated. Therefore, the proposed project will not alter natural flow of navigable waters or obstruct public navigation.

(2) Whether or not unreasonably harmful or increased erosion shoaling of channels, or stagnant areas of water will be created- The proposed bulkhead is intended to stabilize the existing shoreline and reduce erosion and sediment loss. Its installation is not expected to alter existing water circulation or channel characteristics in a manner that would cause increased erosion, shoaling, or stagnant water conditions.

(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 bulkhead will be confined to the shoreline and will result in minimal disturbance to adjacent aquatic habitat. The project is not expected to substantially affect water quality, dissolved oxygen, or habitat conditions necessary to support fish, shellfish, wildlife, or other aquatic resources.

RLC

1 July 2025

Mr. Brian Crooks
City of Richmond Hill
Planning and Zoning Administrator
bcrooks@richmondhill-ga.gov

RE: Request For PCN (NWP #13) and CMPA Permit **RLC#: 10-065.7**
Ford Field & River Club Outfall Structure Bank Stablization
Bryan County, Georgia

Dear Mr. Crooks: 10/24/25

The Ford Field & River Club is applying for a permit, under the Coastal Marshlands Protection Act of 1970, O.C.G.A. §12-5-280, requesting authorization for activities associated with the stabilization of the canal bank stream and downstream of an existing water control structure located near the south end of Lake Clara within the Ford Field & River Club, Bryan County, Georgia (31.927805°, -81.277390°). In accordance with O.C.G.A. § 12-5-286(6), the applicants must submit a letter from the local issuing authority in which the property is located stating that the proposed activity does not conflict with any zoning laws. At your earliest convenience, please confirm that the applicant's proposal does not violate the muncipal zoning laws associated with the project location. In addition, it is the Georgia Department of Natural Resources, Coastal Resources Division policy to request that you initial and date the attached plans so that they can insure that the final permitted facility is consistent with your initial review. Please forward your letter, along with the initialed copies of the permit drawings, to our office or to us via email.

We appreciate your assistance with this project. If you should have any questions or require additional information, please contact us at 912-443-5896.

Sincerely,

Matthew Willis
Project Manager
Resource & Land Consultants

cc: Mr. Jeff Dekruif – The Ford Field & River Club
Mr. Ray Pittman – Pittman Engineering

RICHMOND HILL
GEORGIA

August 26, 2026

Re: Lake Clara Bank Stabilization

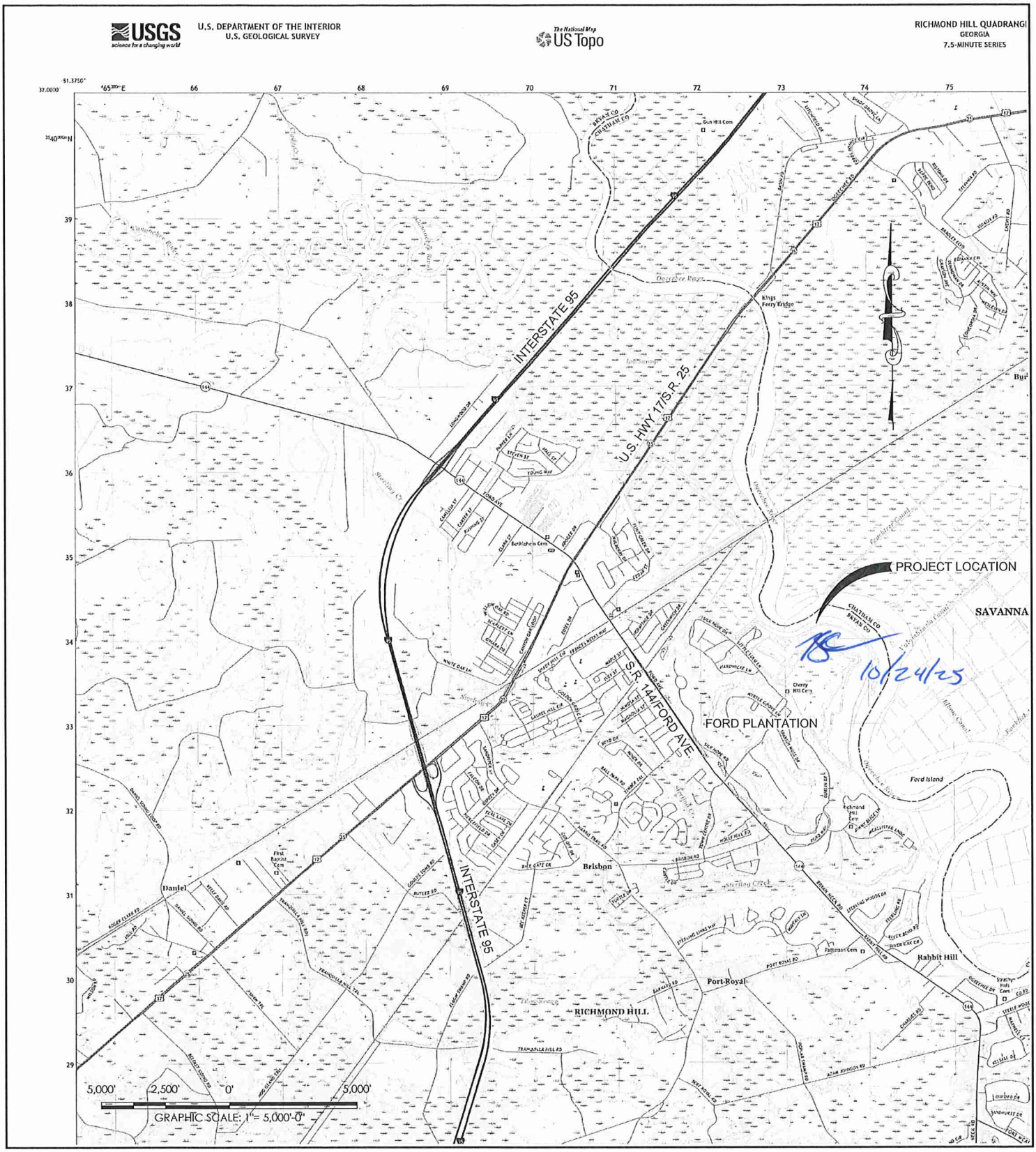
To Whom It May Concern:

This letter is in response to your request for the City of Richmond Hill to provide a letter verifying that the Lake Clara Bank Stabilization project would be in compliance of local zoning regulations. This letter confirms the Lake Clara Bank Stabilization project does not violation any zoning regulation and would be in compliance with local law.

If you have any questions, or need further clarification, please feel free to contact me at 912-756-7273.

Sincerely,

Brian D. Crooks, AICP, CFM
Director of Planning & Zoning

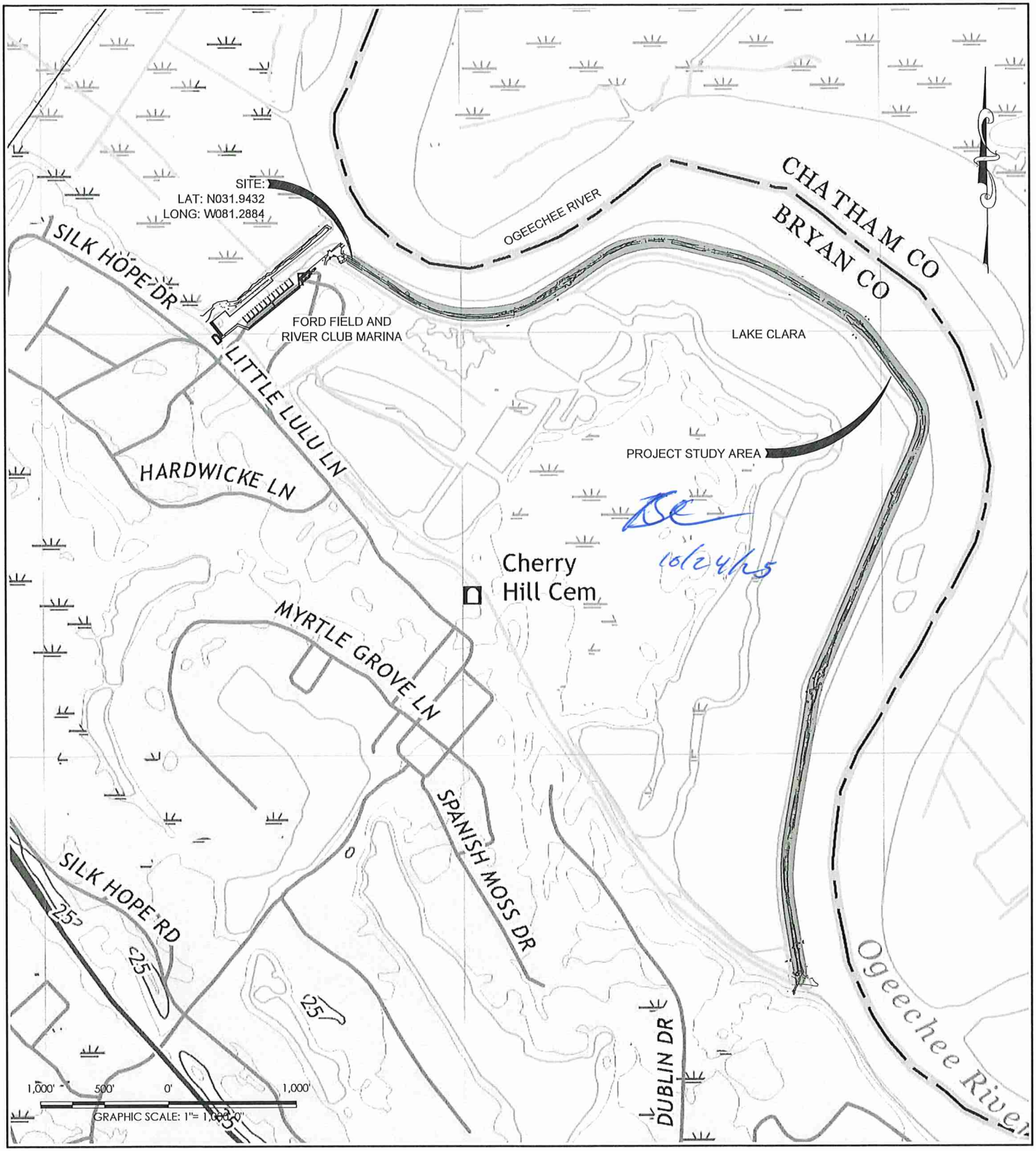


FORD FIELD AND RIVER CLUB
LAKE CLARA DIKE RESTORATION LOCATION MAP
RICHMOND HILL, GA
PREPARED FOR:
FORD FIELD AND RIVER CLUB
123B MAINTENANCE RD.
RICHMOND HILL, GA 31324
(912)756-5666

THE FORD FIELD & RIVER CLUB

J# - 2023-20
01/18/2024
SHEET: 1 OF 6

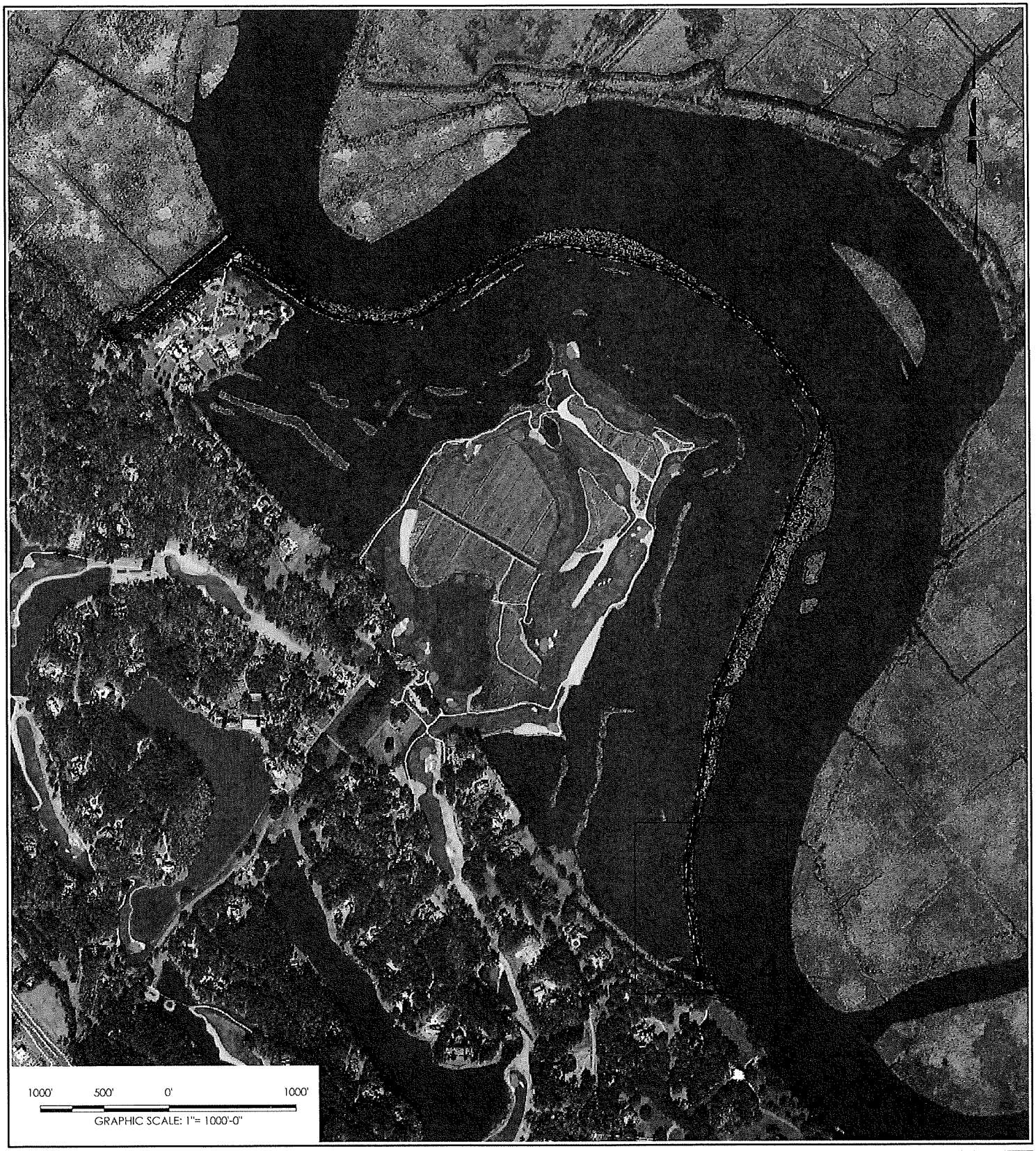
Pittman Engineering Co., LLC
2591 Hwy 17S Suite 303
Richmond Hill, GA 31324
912-445-0578
www.PittmanEngineeringCo.com



FORD FIELD AND RIVER CLUB
LAKE CLARA DIKE RESTORATION SITE MAP
RICHMOND HILL, GA
PREPARED FOR: THE FORD
FORD FIELD AND RIVER CLUB
123B MAINTENANCE RD.
RICHMOND HILL, GA 31324
(912)756-5666

J# - 2023-20
01/18/2024
SHEET: 2 OF 6

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FORD FIELD AND RIVER CLUB
LAKE CLARA DIKE RESTORATION SHEET INDEX
RICHMOND HILL, GA
PREPARED FOR:
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123B MAINTENANCE RD.
RICHMOND HILL, GA 31324
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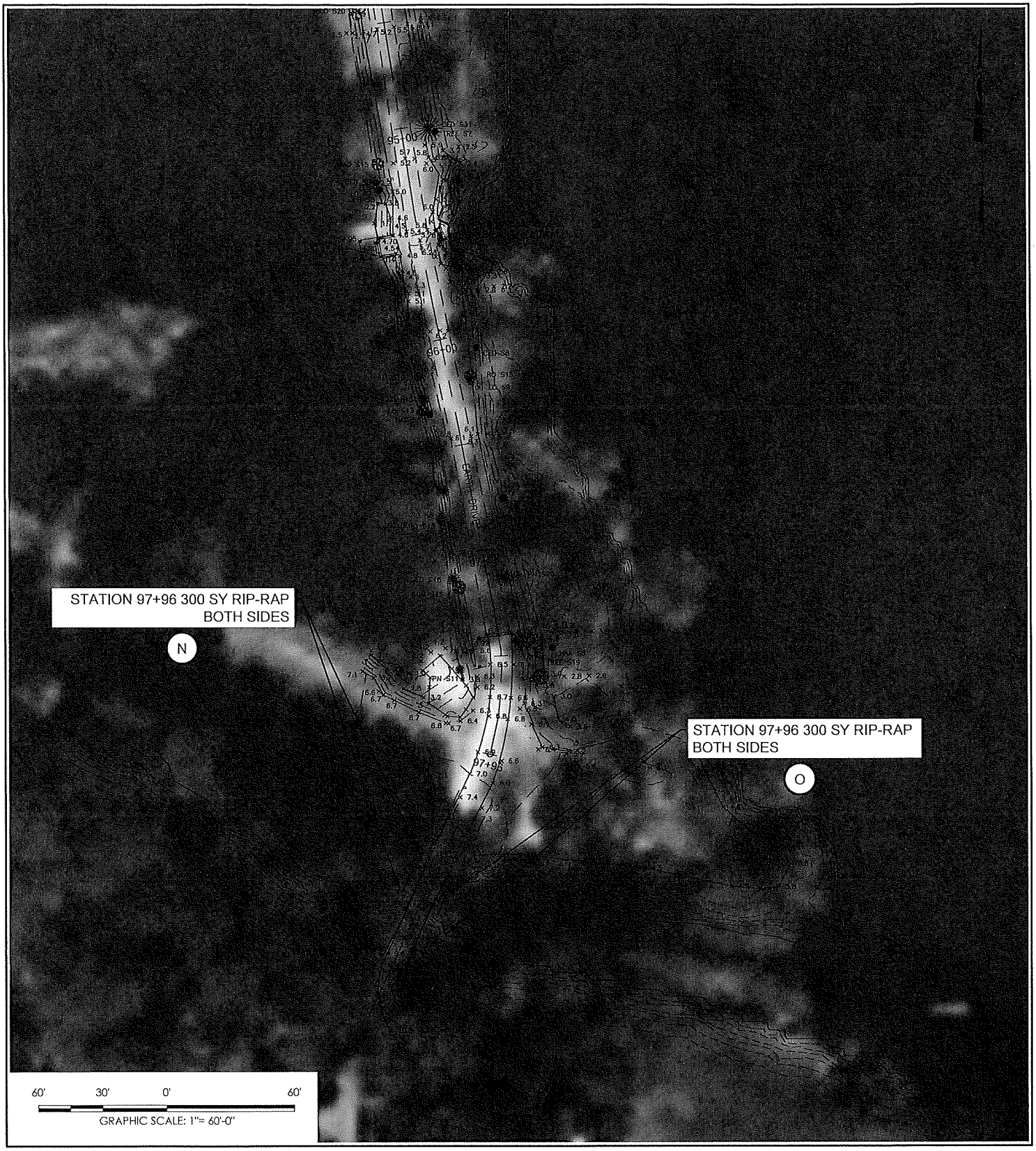
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BC 10/24/25



FORD FIELD AND RIVER CLUB
LAKE CLARA DIKE RESTORATION PLAN
RICHMOND HILL, GA
PREPARED FOR:
FORD FIELD AND RIVER CLUB
123B MAINTENANCE RD.
RICHMOND HILL, GA 31324
(912)756-5666

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BC 10/4/25

FORD FIELD AND RIVER CLUB LAKE CLARA LEVEE IMPROVEMENT SUMMARY			
LOCATION	DESCRIPTION	UNITS	QUANTITY
N	BROKEN CONCRETE	SY	300
O	BROKEN CONCRETE	SY	300

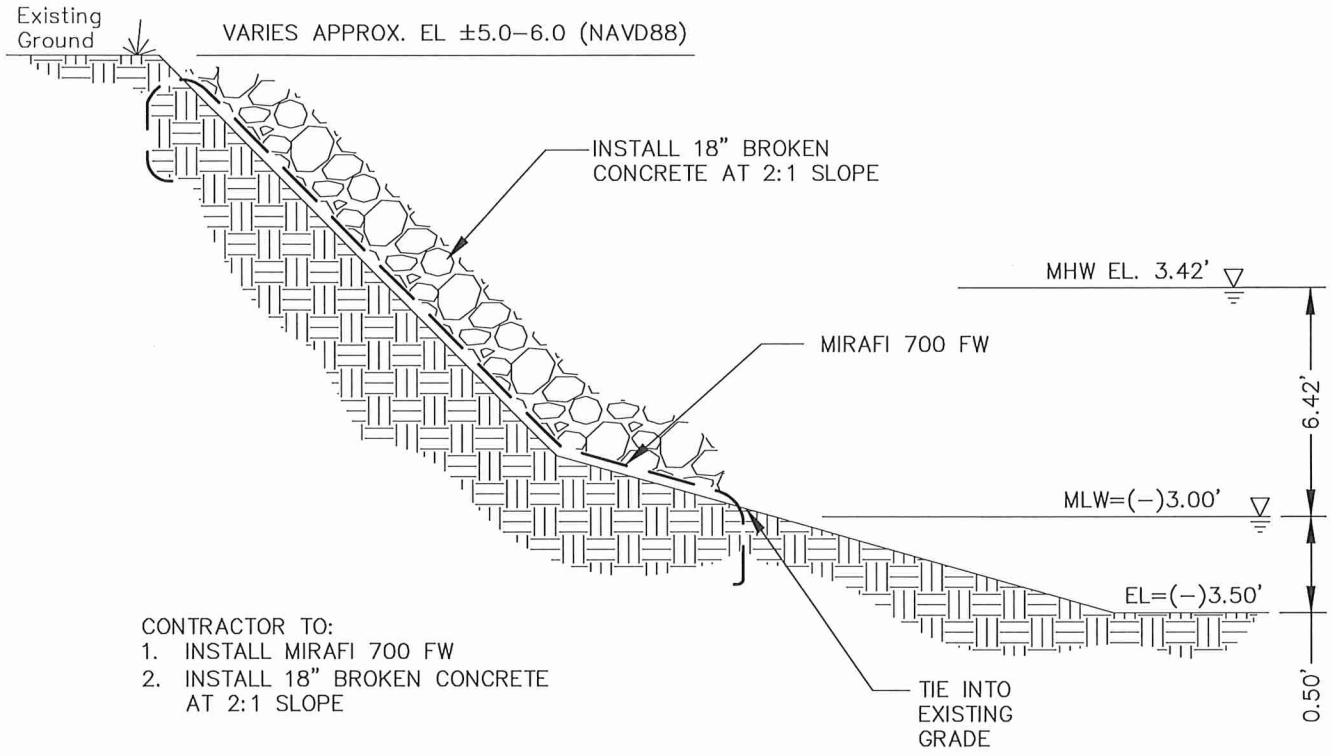
10/24/25

FORD FIELD AND RIVER CLUB
LAKE CLARA DIKE RESTORATION SUMMARY
RICHMOND HILL, GA
PREPARED FOR:
FORD FIELD AND RIVER CLUB
123B MAINTENANCE RD.
RICHMOND HILL, GA 31324
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RIP-RAP INSTALLATION DETAIL

SCALE: N.T.S.

10/24/25

FORD FIELD AND RIVER CLUB
LAKE CLARA DIKE RESTORATION DETAILS
RICHMOND HILL, GA
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