



June 3, 2020

Mr. Paul Tobler
Permitting Coordinator
GADNR/CRD
One Conservation Way
Brunswick, GA 31520

**RE: CHC Properties, LLC Bay Street Marine Terminal
SAS-2020-00101**

RLC#: 18-223

Dear Mr. Tobler:

I refer to your email inquiry of June 1, 2020 regarding the application for CHC Properties, LLC's proposed maintenance and improvements at their marine terminal site located on the East River, at 911 Bay Street, in Brunswick, Glynn County, Georgia.

As stated in your email, you are inquiring about the area calculations of the proposed maintenance to the existing rock revetment and boat haul out. On the original drawings, the areas shown on Sheet 3 for existing conditions only calculated the Rock/Rubble Shoreline Protection to include the area within the immediate footprint of the proposed maintenance above MLW, even though the extent of the existing rock/rubble extends below the MLW contour. The existing rock/rubble area calculation also included the area of the boat haul out, as there is no discernable point to differentiate them due to similar smaller rock/rubble materials present on both the existing revetment and within the boat haul out area.

Therefore, under the previously submitted drawings, Sheets 3 and 4, the proposed maintenance to the boat haul out, when added to the proposed maintenance of the rock/rubble shoreline protection, appeared to imply that the work area would exceed the existing conditions footprint. That is not the case, however, as all maintenance to the shoreline protection and boat haul out will be conducted within existing rock/rubble areas. The existing conditions calculation has therefore been modified to include the entire rock/rubble shoreline down to MLW, for a revised area of 24,938 ft². The proposed maintenance activities shown on Sheet 4 remain unchanged and would occur within an area of 17,469 ft² located within the 24,938 ft² of existing rock/rubble.

Attached is a revised Sheet 3, Existing Conditions, reflecting the above referenced explanation. We trust that this information is sufficient to place the project on public notice. If you should have any questions or require additional information, please contact me at your earliest convenience.

Sincerely,
RESOURCE & LAND CONSULTANTS, LCC

Daniel H. Bucey, Principal

Enclosure

cc: Mr. Roscoe Sullivan, III; USACE

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JUN 03 2020

GA DNR

Tobler, Paul

From: Daniel Bucey <dbucey@rlandc.com>
Sent: Wednesday, June 3, 2020 11:21 AM
To: Tobler, Paul
Cc: Noble, Josh
Subject: RE: RAI Response
Attachments: 18-1015 CHC 911 BAY PERMIT SHEET 3 06-03-20.pdf; CHC_DNR_response_6_3_20.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Paul:
Attached is explanation for area calculations and a clean copy of the revised sheet 3.
Thanks,

Daniel Bucey, PRINCIPAL
41 Park of Commerce Way, Suite 101
Savannah GA, 31405
P 912 443 5896 F 912 443 5898 C 912 659 0988
<http://www.rlandc.com>

Please note new address: 41 Park of Commerce Way, Suite 101 / Savannah, GA 31405



From: Tobler, Paul <paul.tobler@dnr.ga.gov>
Sent: Monday, June 1, 2020 3:19 PM
To: Daniel Bucey <dbucey@rlandc.com>
Cc: Noble, Josh <Josh.Noble@dnr.ga.gov>
Subject: Re: RAI Response

Dan,

We are trying to get this PN finalized and something come up during the review. The existing footprint for the boat ramp and rip rap are listed as one value but they are split on the proposed drawings and added to the narrative. If you do the math they don't match up, or at least don't seem too. See below:

Proposed bank stabilization= 12,321sq.ft.
Proposed boat ramp maintenance=5148sq.ft.
12321 +5148= 17469
Existing drawings:Rock/Rubble shoreline protection= 15,534sq.ft.

Can you please update the project narrative and see if the engineer can clarify the discrepancy in the values? Ill follow up with a call to explain further.

RE: RAI ResponseDaniel Bucey <dbucey@rlandc.com>

Fri 5/29/2020 12:28 PM

To: Tobler, Paul <paul.tobler@dnr.ga.gov>**Cc:** Noble, Josh <Josh.Noble@dnr.ga.gov> 1 attachments (4 MB)

18-1015 CHC 911 BAY PERMIT-05-29-2020.pdf;

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Paul;

Attached is updated drawings. They converted the SY calculations to SF for each sheet to match. The detachable ramp is actually not a part of the trestle itself, but is typically part of the barge and is barge dependent depending on which barge is there. It is connected by gravity on a ledge on the trestle or could be bolted. It could typically be 30' wide maximum by 20' long. It is basically a removable steel plate that overlaps on top of the barge deck.

Sincerely,

Daniel Bucey, PRINCIPAL

41 Park of Commerce Way, Suite 101

Savannah GA, 31405

P 912 443 5896 F 912 443 5898 C 912 659 0988

<http://www.rlandc.com>

Please note new address: 41 Park of Commerce Way, Suite 101 / Savannah, GA 31405

**From:** Tobler, Paul <paul.tobler@dnr.ga.gov>**Sent:** Friday, May 22, 2020 2:40 PM**To:** Daniel Bucey <dbucey@rlandc.com>**Subject:** Re: RAI Response

Dan,

Can you please get me some approximate measurements for the detachable barge ramp for the PN? How will it be attached to the barge trestle? I have sent the draft up line but I know they will want it described even though it sounds like it wont add to any permanent impacts.

Have a good long weekend and let me know if there are questions in the meantime. Thanks.

Paul D. Tobler

Permitting Coordinator

[Coastal Resources Division](#)

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GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: Daniel Bucey <dbucey@rlandc.com>
Sent: Thursday, April 30, 2020 11:09 AM
To: Tobler, Paul <paul.tobler@dnr.ga.gov>
Cc: Sullivan, Roscoe L III CIV USARMY (USA) <Roscoe.L.Sullivan@usace.army.mil>
Subject: RAI Response

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Paul;

Attached is additional information relating to your RAI. Let me know if you need anything else to place this project on public notice. Also attached is 401 that came back yesterday.

Thanks,

Daniel Bucey, PRINCIPAL

41 Park of Commerce Way, Suite 101

Savannah GA, 31405

P 912 443 5896 F 912 443 5898 C 912 659 0988

<http://www.rlandc.com>

Please note new address: 41 Park of Commerce Way, Suite 101 / Savannah, GA 31405





April 30, 2020

Mr. Paul Tobler
Coastal Permit Coordinator
Georgia Department of Natural Resources, CRD
Brunswick, GA 31520

**RE: Application for a CMPC Permit Continental Heavy Civil, LLC East River
Brunswick, Glynn County, Georgia**

Dear Mr. Tobler:

I refer to your letter of March 31, 2020, requesting additional information regarding the application by Continental Heavy Civil, LLC dated January 22, 2020 requesting Coastal Marshlands Protection Act authorization to construct a marine terminal on the East River, in Brunswick, Glynn County, Georgia. This information is supplemental to the information provided to you and the U.S. Army Corps of Engineers via email of April 22, 2020.

As stated in your request, clarification is necessary prior to the project being placed on public notice. Following is the individual items requested, followed by the applicant's response.

1. Construction plans signed the City of Brunswick Planning, Development, and Codes Department.

Applicant's Response: A copy of the project plans has been sent to the City of Brunswick Planning, Development, and Codes Department for validation.

2. Signed, stamped, and dated drawings by a licensed architect, land surveyor, or professional engineer.

Applicant's Response: Project drawings produced by Ball Maritime Group, LLC titled *CHC 911 Bay Waterfront Upgrade*, dated April 9, 2020 are attached.

3. The submitted plans for the proposed sheet pile bulkhead appear to be in jurisdiction. Will there be back fill? If so, what kind and how much? Detailed construction methods should be provided as well.

Applicant's response: The sheet pile only runs parallel with the waterfront for 125-ft. The dimension on the drawing reflects total length including the part of the walls that cuts back into the haul out. There is no fill behind the sheet pile wall. The sheet pile is not a retaining wall. It is used to guide the barges and work them. The steel sheet pile will be driven in place with either impact or vibratory hammer.

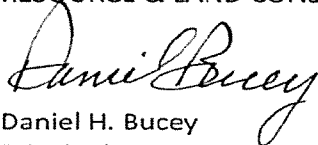
4. How much fill material will be required to construct the "boat haul-out ramp"? Will excavation of jurisdictional marshlands be required? Include construction methods and any temporary impacts associated with the construction of this portion of the project.

Applicant's response: The width of the haul out is approximately 50-ft. Drawing No. 4 is annotated to show 5,150-sf and 190-cy below the ordinary high water line in the legend. No vegetated marsh is present at the existing boat haul-out ramp. Existing larger rocks or construction debris would be removed, and the existing materials at the ramp would be graded flat. A layer of coarse aggregate would augment the existing materials.

5. Please describe the existing rip rap bank stabilization in more detail. Include approximate volume of material in jurisdiction currently and the volume of material to be added. The application describes width and depth of proposed material but not a linear value. Will it be added for the full length of the project area or just in the areas where the bulkhead is not proposed?

Applicant's response: The length of the waterfront is 496-ft. The width of the haul out is approximately 50-ft. That means that approximately 446-ft of the waterfront has rip-rap that needs to be repaired. All of that is below the ordinary high water line. Drawing No. 4 is annotated to show 12,321-sf and 913-cy in the legend. The running number is 2cy/ft along the bank.

Sincerely,
RESOURCE & LAND CONSULTANTS



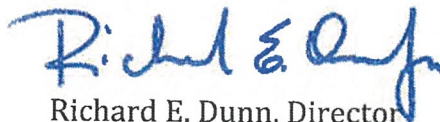
Daniel H. Bucey
Principal

enclosures

The Georgia Environmental Protection Division may invalidate or revoke this certification for failure to comply with any of these terms or conditions. This certification does not waive any other permit or other legal requirement applicable to this project or relieve the applicant of any obligation or responsibility for complying with the provisions of any other federal, state, or local laws, ordinances, or regulations.

It is your responsibility to submit this certification to the appropriate federal agency. If you have any questions regarding this certification, please contact Stephen Wiedl at Stephen.Wiedl@dnr.ga.gov/404-651-8459.

Sincerely,



Richard E. Dunn, Director
Environmental Protection Division

cc: Mr. Roscoe Sullivan, Corps
Mr. Eric Somerville, EPA
Mr. Bill Wikoff, FWS
Ms. Kelie Moore, CRD
Mr. Dan Bucey, RLC



April 30, 2020

Brunswick Planning, Development, & Codes Department
Attn: Mr. John Hunter
601 Gloucester Street
Brunswick, Georgia 31520

**RE: Continental Heavy Civil Corp / 911 Bay Street
Parcels 01-01137, 01-07041, & 01-07042 Brunswick, Glynn County, Georgia**

Dear Mr. Hunter:

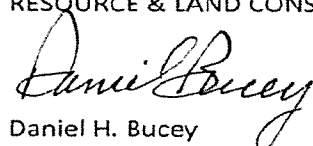
Resource & Land Consultants, on behalf of Continental Heavy Civil Corp (CHCC), submitted an application to the Georgia Department of Natural Resources, Coastal Resources Division (CRD) seeking authorization under the Coastal Marshlands Protection Act (CMPA) (O.C.G.A. §12-5-280) to conduct activities within CMPA jurisdiction on a 3.892 acre tract located on the East River, in Brunswick, Glynn County, Georgia (Sheet 2 of 6).

As you may recall, you issued a letter dated January 6, 2020, stating that the proposed activities were allowed within General Commercial Zoning, and that the storage of materials and equipment was allowed under a Conditional Use Permit that was issued on December 11, 2019 by the Brunswick City Commission.

As required under the application procedures promulgated by CRD, they require that you initial or stamp the plans associated with the application. I've attached a copy of the plans produced by Ball Maritime Group, LLC titled *CHC 911 Bay, Waterfront Upgrade*, dated April 9, 2020. At your earliest convenience, please stamp, sign, or initial each page of the attached drawings and return to my attention.

We appreciate your timely response to this request. If you should have any questions or require additional information, please contact me at your earliest convenience.

Sincerely,
RESOURCE & LAND CONSULTANTS


Daniel H. Bucey
Principal

Enclosures

cc: Mr. Ryan Purvis; CHC



ENVIRONMENTAL PROTECTION DIVISION

APR 27 2020

Richard E. Dunn, Director

EPD Director's Office

2 Martin Luther King, Jr. Drive
Suite 1456, East Tower
Atlanta, Georgia 30334
404-656-4713

Mr. David Juelle
Continental Heavy Civil Corp.
13131 SW 132nd Street
Miami, Florida 33186

Re: Water Quality Certification
Joint Public Notice SAS-2020-00101
Bay Street Marine Terminal Facility
Cumberland-St. Simons Watershed
Glynn County

Dear Mr. Juelle:

In accordance with Section 401 of the Federal Clean Water Act, 33 U.S.C. § 1341, the State of Georgia has evaluated the Bay Street Marine Terminal Facility submitted by Continental Heavy Civil Corp., an applicant for a federal permit or license to conduct activity in, on, or adjacent to the waters of the State of Georgia.

The State has examined the information regarding the Bay Street Marine Terminal Facility provided to it by Resource and Land Consultants. In accordance with that information, the State of Georgia issues this Section 401 certification to Continental Heavy Civil Corp. This Section 401 water quality certification is subject to the following terms and conditions:

1. All work performed during construction will be done in a manner so as not to violate applicable water quality standards.
2. The applicant must notify the Georgia Environmental Protection Division of any modifications to the proposed activity including, but not limited to, modifications to the construction or operation of any facility.
3. The applicant must notify the Georgia Environmental Protection Division of any new, updated, or modified applications for federal permits or licenses for the Bay Street Marine Terminal Facility related to activity in, on, or adjacent to the waters of the State of Georgia.

RE: [Non-DoD Source] 911 Bay

Sullivan, Roscoe L III CIV USARMY CESAS (USA) <Roscoe.L.Sullivan@usace.army.mil>

Wed 4/22/2020 2:57 PM

To: Daniel Bucey <dbucey@rlandc.com>

Cc: Tobler, Paul <paul.tobler@dnr.ga.gov>

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Thanks for the info Dan!

Actually, I can waive the 1 cubic yard/running foot according to the NWP 13 term (c). See below for language from NWP 13 regarding waivers:

(c) The activity will not exceed an average of one cubic yard per running foot, as measured along the length of the treated bank, below the plane of the ordinary high water mark or the high tide line, unless the district engineer waives this criterion by making a written determination concluding that the discharge will result in no more than minimal adverse environmental effects;

Considering the history of development and disturbance at the proposed project site and the current conditions on site, I have determined that the proposed discharge would result in no more than minimal adverse environmental effects. Therefore, I am waiving the limitation of one cubic yard per running foot for the proposed project. Additionally, this project has already been coordinated with all appropriate agencies and no comments were provided by the agencies to indicate that the proposed impacts from the project would result in more than minimal adverse environmental effects.

I plan to process the boat ramp impacts under a NWP 3. In order for me to use a NWP 3 for maintenance to the boat ramp, it would need to be currently serviceable. Can you confirm whether or not the boat ramp is currently serviceable? If not, I can likely process it under a NWP36 and waive the width and cubic yardage thresholds.

Best,

Ross Sullivan, PWS, ISA Certified Arborist
Project Manager, Coastal Branch
Regulatory Division
U.S. Army Corps of Engineers, Savannah District

100 West Oglethorpe Avenue
Savannah, Georgia 31401-3604
Phone (912) 652-5618
Fax (912) 652-5995

Thank you in advance for completing our Customer Survey Form. This can be accomplished by visiting our web site at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey, and completing the survey on-line. We



COASTAL RESOURCES DIVISION
ONE CONSERVATION WAY • BRUNSWICK, GA 31520 • 912.264.7218
COASTAL.GADNR.ORG

MARK WILLIAMS
COMMISSIONER

DOUG HAYMANS
DIRECTOR

March 31, 2020

David Juelle
CHC Properties, LLC
13131 SW 132nd Street, Suite 102
Miami, FL 33186

Re: Application for a Coastal Marshlands Protection Act for Construction of a Commercial Marine Terminal and Construction Staging Facility, 911 Bay Street, East River, Brunswick, Glynn County, Georgia.

Dear Mr. Juelle:

The department has reviewed the application for the proposed construction of a Commercial Marine Terminal and Staging Facility for Continental Heavy Civil, LLC. The proposed project provides for a 196 linear foot sheet pile bulkhead bank stabilization, addition of rip rap to the existing shoreline stabilization, construction of a boat haul-out ramp, and construction of a pile-supported barge trestle. The application states that the activities will impact approximately 2,695 square feet (0.06 acres) of coastal marshlands.

Staff has identified additional information that is needed before the application can be placed on public notice. Keep in mind that an application needs to be “substantially complete” before it can be presented to the Coastal Marshlands Protection Committee (CMPC). The following items are required before the application can be placed on Public Notice:

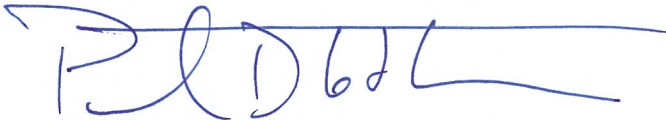
1. Construction plans signed the City of Brunswick Planning, Development, and Codes Department.
2. Signed, stamped, and dated drawings by a licensed architect, land surveyor, or professional engineer.
3. The submitted plans for the proposed sheet pile bulkhead appear to be in jurisdiction. Will there be back fill? If so, what kind and how much? Detailed construction methods should be provided as well.
4. How much fill material will be required to construct the “boat haul-out ramp”? Will excavation of jurisdictional marshlands be required? Include construction methods and any temporary impacts associated with the construction of this portion of the project.
5. Please describe the existing rip rap bank stabilization in more detail. Include approximate volume of material in jurisdiction currently and the volume of material to be added. The application describes width and depth of proposed material but not a linear value. Will it be added for the full length of the project area or just in the areas where the bulkhead is not proposed?

6. A more detailed description and depiction of the upland component of the project; and any permanent or temporary construction activities that may take place within the upland component of the project

Once these materials have been received, and the application is substantially complete, we will begin the public notice process. During the public comment period, the committee will be reviewing the project. I will notify you of any additional information requested by them as provided in the Official Code of Georgia Annotated (O.C.G.A.) 12-5-286. Public comments and questions about your project will be forwarded to you for a written response. Staff will assist you throughout the process.

I appreciate your assistance in working with staff to provide a substantially complete permit application to the Coastal Marshlands Protection Committee for their consideration. Please feel free to contact me at 912-264-7218 with any questions or comments.

Sincerely,



Paul D. Tobler
Coastal Permit Coordinator
DNR Coastal Resources Division

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1.0 Introduction

CHC Properties, LLC (Applicant) is seeking authorization under the Coastal Marshlands Protection Act of 1970 (CMPA) and Section 10 of the Rivers and Harbors Act of 1899 to conduct maintenance and improvements to an existing riverfront industrial site located on the East River, in Brunswick, Glynn County, Georgia (31.14078° latitude, -81.49574° longitude)

CHC Properties, LLC is a real estate holding company for Continental Heavy Civil, a marine construction company conducting work in the southeast U.S. and Caribbean including bridge construction, shoreline protection, dredging, dock and berthing construction and maintenance, and other marine-related specialty projects. The Applicant proposes to construct a marine terminal and marine construction staging facility that will require the maintenance of an existing rock revetment and existing boat haul out ramp, installation of a steel sheet piling wall around the boat haul out ramp, construction of a pile-supported barge trestle, and installation of timber breasting dolphins. As proposed, the project would result in the alteration of +/- 2,956 ft² (0.06-acre) of tidal waters and would be considered a minor alteration as defined at O.C.G.A. §12-5-282(9). We respectfully request that authorization of the project be granted by the Commissioner of the Georgia Department of Natural Resources in accordance with O.C.G.A. §12-5-283(d).

2.0 Existing Conditions

The project area is located on the East River at the western terminus of London Street and Prince Street. The subject property formerly housed a crab processing facility. In 2006, the property was sold to a developer, who subsequently demolished the existing facilities and obtained Department of the Army and Coastal Marshlands Protection Committee permits for bank stabilization and marina construction. The authorized work was never completed.

The site currently consists of areas of concrete and asphalt, overgrown aggregate base, and grassed parking areas. A rock revetment is located along the shoreline, and a boat haul out ramp is located near the downstream property line. The limits of CMPA jurisdiction were verified by CRD staff via letter of February 26, 2019.

3.0 Marshlands Component

As depicted on the project exhibits found at Attachment C, the marshland component of the project consists of the following:

- maintenance of the existing rock revetment and boat haul out ramp
- installation of a sheet pile wall (196 l.f. / 196 ft²)

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- construction of a 30' x 78' barge trestle (2,340 ft²)
- installation of five (5) timber breasting dolphins (+/-420 ft²)

As mentioned in Section 2.0, an existing rock revetment is located along the subject property shoreline slightly landward of the MLW line. The applicant will conduct maintenance on the structure to include addition of 18" of Type 3 granite rip-rap over top of 6" of #4 gravel bedding and non-woven geotextile fabric. The top of the revetment would be restored to approximately 4.5' NAVD88 and would tie into existing grades along the riverbank and would be approximately 24' in width (please refer to Attachment C, Sheet 5 Typical Embankment Section A-A).

The existing boat haul out is located near the southern property line. The haul out ramp was used in the past to facilitate maintenance of large commercial vessels, such as shrimp trawlers. The applicant requires the ramp to facilitate land-based maintenance of commercial and industrial barges and vessels associated with their marine construction business. Maintenance work in jurisdiction would include the placement of a coarse aggregate base and fiberglass grade beams, which would be overlain with push-in-place concrete panels (Attachment C, Sheet 6; Haul Out Ramp Section). The ramp would span from elevation 4.0' NAVD88 to slightly below MLW at approximately -5' NAVD88. A new sheet pile wall (+/-196 l.f.) would be installed surrounding the boat haul out ramp to facilitate extraction and launching of vessels.

The Applicant also proposes to construct a steel pile-supported barge trestle to facilitate loading / unloading of commercial barges and vessels. The barge trestle would be 30' wide by 78' long (+/-2,340 ft²) and would consist of a steel grate deck with curb supported by steel stringers spanning steel beam pipe caps that are supported by steel piles (Attachment C Sheet 6; Trestle Barge Section). The terminal end of the trestle would extend to approximately the MLW line. A detachable barge ramp at the terminal end would provide a means to provide the connection between the barge/vessel and the trestle itself during varying tide levels. The ramp would be detached or folded back onto the landward portion of the trestle when not in use.

To facilitate mooring of barges and vessels in the river, the Applicant proposes to install five (5) timber breasting dolphins at varying distances along the waterfront below MLW (Attachment C Sheet 4). Each dolphin would consist of up to seven (7) pilings clustered and secured together and would occupy approximately 420' of jurisdictional area.

As proposed, the proposed project would result in the alteration of 2,956 ft² of jurisdictional waters.

4.0 Upland Component

The upland component of the project consists of the remaining area of the property located landward of the CMPA jurisdiction line that will provide access to the marshland component and storage of marine related construction materials. As previously discussed, the existing site formerly contained a commercial crab processing facility that occupied the majority of the property, and all of the river frontage. After demolition of the existing facilities, the land currently consists of large areas of concrete, asphalt, and stone base-course, all of which is located along the CMPA jurisdiction boundary

(Attachment C, Sheet 3). Existing conditions on site and within the 50' marshlands buffer will be maintained as provided under the Rules Of Georgia Department Of Natural Resources, Coastal Marshlands Protection, Chapter 391-2 Coastal Resources, Coastal Marshlands Protection at 391-2-3-.02(4)(d):

(d) Already existing impervious surfaces and structures within the marshlands buffer area may remain and be maintained, provided the replacement, modification or upgrade does not increase any encroachment upon the required marshlands buffer in effect at the time of the replacement, modification or upgrade.

The Applicant does not propose any modification of the site that would alter existing stormwater patterns or would result in the discharge of untreated stormwater from the upland component to the marshlands component of the project.

5.0 Alternatives Sites Considered

The Applicant considered alternative sites for the project as required under O.C.G.A. § 12-5-286(b)(8):

(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

The purpose of the project is to provide a functional marine terminal and supply yard. To achieve this objective, the site must be located on a navigable water capable of allowing barge and commercial vessels to navigate around the clock. The site must be located in an accessible area near the Ocean to reduce travel and mobilization times and costs. Rail access to provide efficient delivery and transfer of raw materials is also necessary. In Glynn County, this section of the East River is the ideal location, and surrounding land uses currently support the proposed use. Given the current condition of the formerly developed site, the impacts proposed would not further degrade coastal marshlands. Alternate undeveloped sites would likely require more extensive impacts to higher quality wetlands and/or marsh habitats. Inland or other locations that would not provide navigable water access would not serve the overall project purpose, and would result in an outcome similar to a No-action alternative, where the project would not be practicable.

On-site alternatives included reclamation of the former building site. During demolition, removal of debris resulted in a low-elevation depression that subsequently receives tidal flows during extreme tides and wakes produced by boat traffic on the river. This alternative was not pursued due to the amount of jurisdictional impacts that would have resulted.

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The project as proposed consists of maintenance of existing structures and low-impact pile supported structures on a formerly developed site. The project location meets all of the Applicant's objectives and would result in a minor alteration of jurisdictional waters, and therefore should be approved by the Commissioner under the minor alteration provision of the CMPA.

6.0 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:

(1) The name and address of the Applicant-

CHC Properties, LLC
Attn: Mr. David Juelle
13131 SW 132nd Street Suite 102
Miami, Florida 33186

(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- Please refer to attached drawings produced by Ball Maritime Group, LLC titled **CHC 911 Bay**, Sheets 1 through 6, dated January 8, 2020 (Attachment C). The work will be accomplished by heavy equipment from both upland and barge locations.

(3) A plat of the area in which the proposed work will take place- Attachment F contains a drawing produced by Shupe Surveying Company, P.C. titled **A Boundary Retracement And CMPA Jurisdiction Line Survey Of: Lots 31-35 Old Town Water Lots And A Portion Of Prince Street**, dated October 22, 2018.

(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

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conflicting deeds- A Quit-Claim Deed conveying the subject property from Continental Heavy Civil Corp to CHC Properties, LLC recorded and filed with the Clerk of Superior Court in Glynn County Georgia on July 31, 2019 is included at Attachment B.

- (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 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-** Adjacent landowner information is provided in Attachment E.
- (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 in violation of any zoning law;** A letter from the City of Brunswick Planning, Development & Codes Department dated January 6, 2020 stating that the proposed project complies with current zoning regulations is included at Attachment D.
- (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.** An application fee in the amount of \$500.00 has been included with this application.
- (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-** Please refer to Section 5.0, page 3.
- (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-** A review of the Hazardous Site Index for Glynn County, Georgia indicates that the subject property does not contain hazardous waste sites or landfills.
- (10) A copy of the water quality certification issued by the department if required for the proposed project-** Water Quality Certification in accordance with Section 401 of the Clean Water Act will be reviewed during the processing of the federal permits necessary for construction under the purview of the U.S. Army Corps of Engineers.

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5 | Page

JAN 23 2020
GA DNR / HMP

(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 building, land disturbing, and stormwater management permits as required by the City of Brunswick.

(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-** The proposed project consists of the maintenance and repair of existing structures and the installation of pile supported or driven structures at or near the MLW line. No fill or other alterations are proposed that would unreasonably obstruct or alter navigable waters.

(2) **Whether or not unreasonably harmful or increased erosion, shoaling of channels, or stagnant areas of water will be created-** The maintenance of the existing revetment and boat haul out ramp will provide increased protection from erosion at the project site and will not unreasonably increase erosion at other locations. The pile supported breasting dolphins, steel barge trestle, and sheet pile walls will not create areas of stagnant waters as the river will flow around the structures

(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 structures 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. The proposed project is located on a formerly developed site, and the proposed impacts are minor and will be constructed in a location and manner that will not unreasonably interfere with these resources. During construction, Applicant will adhere to Standard Manatee Conditions to minimize conflicts with the species.

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Attachment F:

CMPA Jurisdictional Determination

& Site Survey



DEPARTMENT OF NATURAL RESOURCES
COASTAL RESOURCES DIVISION
ONE CONSERVATION WAY • BRUNSWICK, GA 31520 • 912.264.7218
COASTAL.GADNR.ORG

MARK WILLIAMS
COMMISSIONER

DOUG HAYMANS
DIRECTOR

February 28, 2020

Dan Bucey
Resource and Land Consultants, LLC
41 Park of Commerce Way, Suite 101
Savannah, GA 31405

**Re: Coastal Marshland Protection Act (CMPA), Jurisdictional Determination
Reverification, 911 Bay Street, Lots 31-35, Brunswick, Glynn County, Georgia**

Dear Mr. Bucey:

Our office has received the survey and plat, dated February 18, 2019, prepared by Shupe Surveying Company, P.C., No. 3081 entitled "*A Boundary Retracement and CMPA Jurisdiction Line Survey of: Lots 31-35 Old Town Water Lots and a Portion of Prince Street 26th G.M.D. City of Brunswick Glynn County, Georgia*" prepared for Continental Heavy Civil Corp. Based on my site inspection, on February 25, 2020, this plat and survey generally depict the delineation of the marsh/upland boundary as required by the State of Georgia for jurisdiction under the authority of the Coastal Marshlands Protection Act O.C.G.A. § 12-5-280 et seq.

The Coastal Marshlands Protection Act O.C.G.A. § 12-5-280 et seq. delineation of this parcel is subject to change due to environmental conditions and legislative enactments. This jurisdiction line is valid for one year from date of the delineation. It will normally expire on February 25, 2021 but may be voided should legal and/or environmental conditions change.

This letter does not relieve you of the responsibility of obtaining other state, local, or federal permission relative to the site. Authorization by the Coastal Marshlands Protection Committee or this Department is required prior to any construction or alteration in the marsh jurisdictional area. We appreciate you providing us with this information for our records. If you have any questions, please contact me at (912) 264-7218.

Sincerely,

Paul Tobler
Coastal Permit Coordinator
Marsh and Shore Management Program

Enclosure: *A Boundary Retracement and CMPA Jurisdiction Line Survey of: Lots 31-35 Old Town Water Lots and a Portion of Prince Street 26th G.M.D. City of Brunswick Glynn County, Georgia*

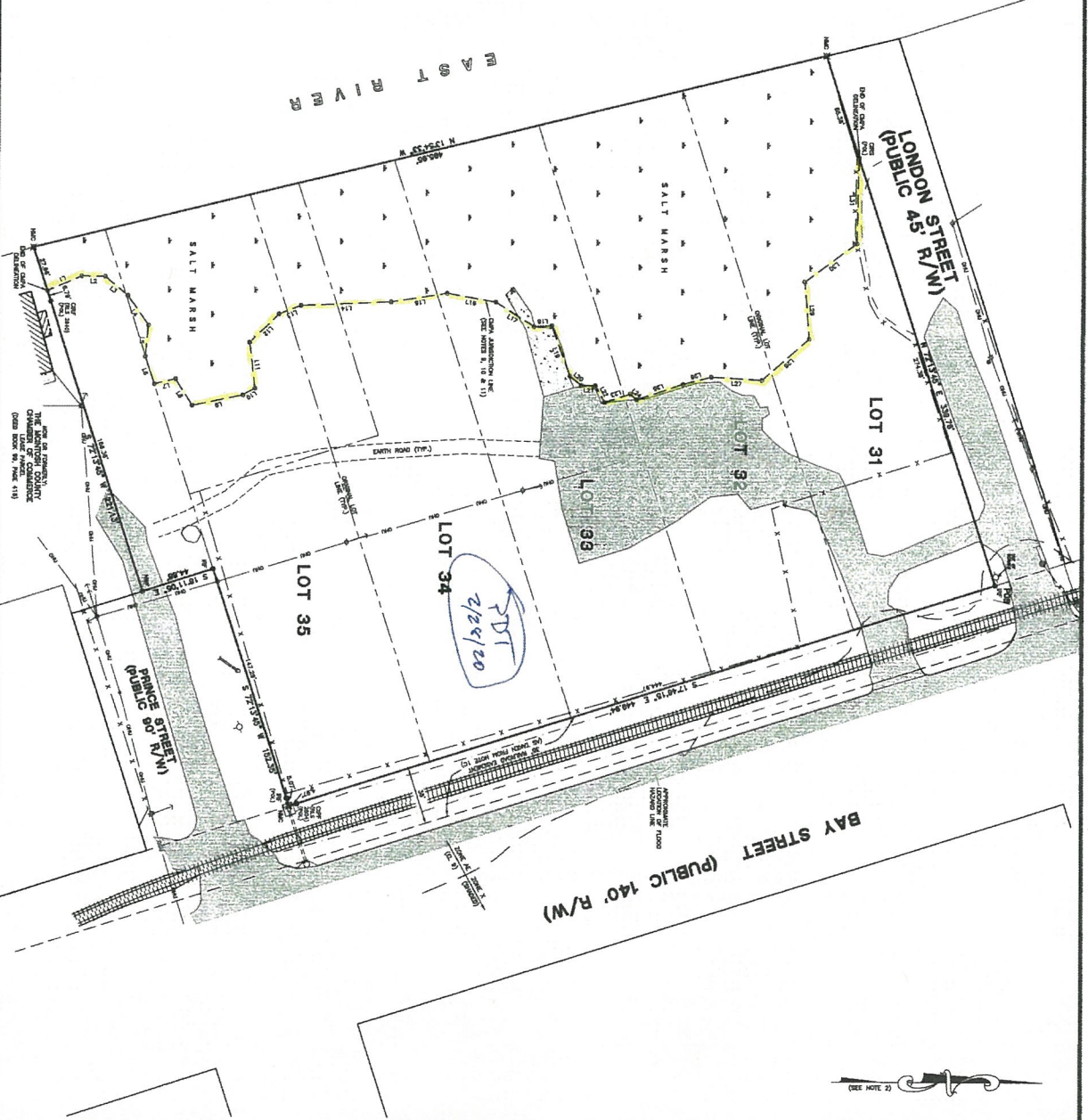
File: JDS20200039

AREA CHART

SUB AREA	AREA (ACRES)	TOTAL AREA (ACRES)
LOT 31	1.201	1.201
LOT 32	1.201	2.402
LOT 33	1.201	3.603
LOT 34	1.201	4.804
LOT 35	1.201	6.005
TOTAL	6.005	6.005

1	1	1	1	1	1	1	1	1	1
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4	4	4	4	4	4	4	4	4	4
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1. REVISIONS
2. SURVEY BY S. H. ...
3. ...
4. ...
5. ...
6. ...
7. ...
8. ...
9. ...
10. ...
11. ...



LEGEND

1" = 100'	1" = 100'
...	...

SHIPP SURVEYING COMPANY, P.C.
 2871 SANDWICH
 CITY OF SANDWICH
 CLATSOP COUNTY, OREGON

CONTINENTAL HEAVY CIVIL CORP
 PREPARED FOR:
 ...



SHIPPERS RECORDING CERTIFICATION
 THE PLAN ... IS ACCURATE ...

NOTES
 1. ...
 2. ...
 3. ...



COASTAL RESOURCES DIVISION
ONE CONSERVATION WAY • BRUNSWICK, GA 31520 • 912.264.7218
COASTALGADNR.ORG

MARK WILLIAMS
COMMISSIONER

DOUG HAYMANS
DIRECTOR

February 26, 2019

Dan Bucey
Resource and Land Consultants, LLC
41 Commerce Way Suite, Suite 303
Savannah, GA 31405

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Verification, 911 Bay Street, Lots 31-35, Brunswick, Glynn County, Georgia**

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Sincerely,

Jordan Dodson
Coastal Permit Coordinator
Marsh and Shore Management Program

Enclosure: *A Boundary Retracement and CMPA Jurisdiction Line Survey of: Lots 31-35 Old Town Water Lots and a Portion of Prince Street 26th G.M.D. City of Brunswick Glynn County, Georgia*

File: JDS20180257

