1.0 Introduction

Glynn County Engineering Services is seeking authorization under the Coastal Marshlands Protection Act of 1970 (CMPA) to construct a new drainage ditch in uplands, and to tie the new drainage ditch into an existing tidal drainage canal located west of Spur 25, south of Altama Avenue, in Brunswick, Glynn County, Georgia (31.18803 N, -81.47311 W).

The proposed project will provide necessary improvements to the existing stormwater management system in this area and create the ability to divert stormwater and alleviate flooding in the College Park area of Brunswick. The marshlands component of the project consists of minor dredging along the bank of the existing Cypress Mill Creek canal to facilitate connection of the proposed upland constructed stormwater ditch. The upland component consists of the upland area adjacent to the proposed tie-in necessary to construct and maintain the outfall. As proposed, the project would require dredging of +/- 1,707 ft^2 (0.039-acre; 109 CY) of tidal ditch, and thus qualifies as a minor alteration under 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 total drainage project area is approximately 15.6 acres in size, the majority of which is located outside of CMPA jurisdiction within the existing College Park subdivision. An existing maintained drainage ditch is located west of the Spur and south of Altama Avenue that drains the College Park residential area. This ditch carries stormwater under the Spur (east) to other ditches within developed areas that empty into the marsh at U.S. 17 north of Palmera Lane.

The project area south of the existing ditch varies from upland forested R.O.W. to cleared/maintained R.O.W. with no discernable ditch or swale to effectively carry stormwater. At the southern terminus of the project area, Cypress Mill Creek, which at this location consists of a tidal canal (Cypress Mill Creek) that has been historically excavated and straightened for stormwater conveyance, abuts the R.O.W. It is at this location that the proposed new upland excavated stormwater ditch would connect to Cypress Mill Creek.

The CMPA jurisdiction limits for the proposed project were verified by CRD staff via letter of April 22, 2024 (Attachment E).

3.0 Project Description

Due to the large drainage basin and extensive developed property that is served by this ditch, it is unable to effectively transport stormwater during moderate to severe storm events, and flooding is frequent in the College Park area. Therefore, the proposed project would require the construction of a new stormwater conveyance along the west side of Spur connecting the existing College Park ditches to Cypress Mill Creek.

The proposed work will provide improved management of stormwater to alleviate flooding in the College Park area. The CMPA regulated portion of the project consists of the excavation of a small portion of the eastern bank of Cypress Mill Creek to allow the tie-in of the proposed upland stormwater diversion ditch.

4.0 Marshlands Component

The proposed connection to the Cypress Mill Creek canal necessitates excavation of uplands up to the canal bank and excavation of a small portion of the tidal waterway below the HTL (see Sheets 6, 7, & 11, Attachment B). The excavation of the portion of the bank below the HTL would result in the removal of +/-109 CY of material that will be removed to an upland disposal site. The impact area subject to jurisdiction is +/-1,707 ft^2 (0.039-acre). Access for the work would be from the adjacent uplands. No obstruction of tidal waters would result from the project both during or after construction.

5.0 Upland Component

The upland component for the project consists of a 0.43-acre upland area adjacent to the marshlands component necessary for access during construction and maintenance of the marshlands component of the project post-construction. As required under Rule 391-2-3-.02(4)(a), the permanent post-construction stabilization of the marshlands buffer would prevent additional filling or alteration of the marshlands component of the project.

As provided for at Rule 391-2-3-.02(4)(b)(2), activities within the upland component are required for the following:

- Temporary access for construction and maintenance of the marshlands component,
- construction, maintenance, and access to maintain the functionality of the permanent marshlands component structure, and
- the installation of permanent vegetation post-construction to enhance stormwater management and maintain erosion control.

6.0 Alternative Sites Considered

The applicant considered utilization and improvement of the existing stormwater ditches located east of the Spur. However, portions of the existing ditches are abutted by development on both sides, limiting the amount of alteration of the ditch that could be accomplished, limiting access to the work area, causing complications due to potential ownership issues, and causing disruption of private residences.

Furthermore, utilizing the existing ditch system would still require that the project accommodate the same stormwater load from the west side of the Spur in addition to the stormwater load present on the east side of the Spur. Re-routing the stormwater load from the College Park area through a new ditch located on the west side of the Spur will significantly reduce the load on the east side, which will alleviate delay and/or obstruction of stormwater flows of the College Park basin due to existing constriction and volumes associated with the east side of the Spur.

7.0 Project Justification

The proposed project would provide relief to ongoing flooding issues present in the College Park drainage basin. Many residents are currently experiencing frequent flooding due to the inefficiency of the current system, and implementation of the proposed work can be accomplished with very limited impacts to jurisdictional waters. The proposed work would not result in a discharge of dredge or fill material or a loss of CMPA jurisdictional waters. The project will simply re-route existing stormwater that currently discharges into tidal waters at U.S. 17 north of Palmera Lane into tidal waters associated with the Cypress Mill Creek canal located approximately 3,300' south of the existing discharge location.

8.0 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-
Glynn County Engineering Services
Attn: Jay Hartman, P.E.
4145 Norwich Street
Brunswick, Georgia 31520

(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 EMC Engineering Services titled ***College Park Drainage Basin Improvements***, Sheets 1 through 11, dated September 2, 2020 (Attachment B). The work will be accomplished by equipment located on adjacent uplands. Excavated material will be removed from jurisdiction and disposed of at an upland site.

(3) A plat of the area in which the proposed work will take place- Attachment B contains a drawing produced by EMC Engineering Services titled ***College Park Drainage Basin Improvements***, Sheets 1 through 11, dated September 2, 2020, that depicts the +/-15.61-acre project area and the areas of jurisdiction within. Additionally, Attachment E contains a copy of a survey reflecting the project boundaries and the tidal and non-tidal wetlands within the project boundaries as verified by CRD via letter of April 22, 2024.

(4) A copy of the deed or other instrument under which the applicant claims title to the property or, if the applicant is not the owner, then a copy of the deed or other

instrument under which the owner claims title together with written permission from the owner to carry out the project on his land. In lieu of a deed or other instrument referred to in this paragraph, the committee may accept some other reasonable evidence of ownership of the property in question or other lawful authority to make use of the property; The committee will not adjudicate title disputes concerning the property which is the subject of the application; provided, however, the committee may decline to process an application when submitted documents show conflicting deeds- Glynn County acquired the property associated with this application via a permanent easement over a 11,046 ft^2 area known as Parcel 21 through a Declaration of Taking filed by Glynn County on August 8, 2024 and recorded in the Glynn County Clerk's Office on August 13, 2024 (Attachment F).

(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 D.

(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; The City of Brunswick provided certification for that portion of the project located within City limits via letter of August 29, 2024 (Attachment C). Glynn County provided certification for that portion of the project within County jurisdiction via letter of August 28, 2024 (Attachment C).

(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. Check for $500.00 is attached.

(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 for discussion of alternative sites considered.

(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 project area 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- If required, WQC will be initiated during processing of the CWA 404 and/or Section 10 permit by the USACE. A copy of this application will be provided to GAEPD.

(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 and/or Glynn County.

(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 will not unreasonably obstruct or alter the flow of tidal waters in the project area. The existing Cypress Mill Creek canal will continue to receive tidal flow. No structures are associated with the project. As proposed, intermittent discharge of stormwater through the new diversion ditch would enter the tidal canal, creating neither an obstruction nor an unreasonable alteration of the natural flow. The stormwater associated with this project is currently being discharged into tidal waters approximately 3,300' north of the proposed project. The project will not increase nor decrease current discharge volumes but will simply re-route a portion of the existing discharge to this alternate location.

(2) Whether or not unreasonably harmful or increased erosion, shoaling of channels, or stagnant areas of water will be created- The proposed plan has been designed in a manner that would not result in an unreasonable increase in erosion, cause shoaling of channels, or create areas of stagnant water. The confluence of the proposed stormwater ditch and the existing tidal canal is by design long and wide to reduce discharge velocity to prevent unreasonable erosion.

(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 structure will not unreasonably 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. Although the proposed impact area is tidal, the canal at this location already receives multiple other sources of stormwater discharges, including an existing double culvert immediately adjacent to the proposed impact site. Trash and debris is abundant in this section of the canal, which would not be considered as preferable habitat for marine life. Construction of the project would result in the removal of existing debris within the project limits, and access provided by the new ditch would

allow for routine maintenance of this currently inaccessible area that could improve current conditions and improve marine and wildlife habitat.