

January 9, 2019

2302 Sunnyside Drive
Waycross, GA 31501

Ms. Jordan Dodson
Coastal Permit Coordinator
Coastal Resources Division
GA Department of Natural Resources
One Conservation Way- Suite 300
Brunswick, GA 31520

RE: File CMP20180025

Attached is a completed Coastal Marshland Protection Permit (CMPP) application for an **access road improvement project** at the Dover Bluff Club. The comments, edits and items needing attention based on your August 14 and December 7, 2018 emails have been addressed.

Thank you for your assistance to this point helping us to get an appropriate application package together.

Respectfully,

David A. Ferrell
ferrell2302@gmail.com
912/ 337-5548

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March 17, 2018

**Mr. Josh Noble
Coastal Resources Division
Brunswick, GA**

RE: Dover Bluff Club Access Road Improvement

The Dover Bluff Club has engaged the services of Lamar Brantley and David Ferrell to assist us with our proposed access road improvement project. We are aware of information they are sending forward to you as a proposal to address the need for improved access to our dock.

We concur with their proposal for the road improvement and understand the full necessity to abide by all construction limits as laid out. We furthermore have full intention to follow construction guidelines and protocol of whatever is approved.

As representative for the club on this matter, please feel free to contact me or them with any questions.

Respectfully,

_____/s/_____

**Warren Hereford
Dover Bluff Club**

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Coastal Marshlands Protection Permit Application
Dover Bluff Club Access Road Improvement
June 2018
Revised Dec 2018

Project Summary

The Dover Bluff Club has an existing dock off Black Hammock road to the northeast on Honey Creek. The dock has been in place for over sixty years according to local knowledge. The recent hurricanes damaged the deck portions of the dock to the extent that it will be rebuilt. All necessary permits for this activity have been secured, and the rebuild will occur from the water. Reconstruction of the dock is a total separate activity and has nothing to do with this permit request except that the rebuild is providing impetus for the access road improvement.

The access road to the dock has also been used during this same sixty-year period. The access road is an unimproved path approximately 8-10 feet wide that crosses approximately 668' of jurisdictional marshland. Some of the marsh is at a higher elevation than other parts. Elevations range from 4.8' to 3.6' above mean sea level (MSL).

The access road improvement that is proposed is to minimally upgrade less than 1/10 of an acre (4300 square feet) in the lowest elevation of the marsh. The maximum proposed size of the impact is 10' by 430' to be constructed as one continuous segment. The proposed construction would involve excavation of any vegetative material, placement of non-woven geotextile fabric, and backfilling with 6-8" of GAB (graded aggregate base), crusher run, lime rock or other inert material. The project will result in a narrow one-lane vehicular travel way that will not cause any further damage to the marshland and will provide access to the dock for a wider window of climatic and tidal conditions. A 12" diameter HDPE (high density polyethylene plastic) pipe will be installed at the lowest natural ground elevation and directly in front to re the existing 24" diameter pipe on the adjacent property. This pipe will allow for the free ebb and flow of tidal and freshwater.

Construction is anticipated to be completed with low-ground pressure equipment such as a tracked skid steer or mini-excavator. Temporary matting may be used for access by wheeled trucks to remove excavated material to an upland area and to bring in the GAB backfill. It is fully anticipated that all construction will occur within the designed final limits of the project. Should there be any temporary over spill of material outside the construction limits, these areas will immediately be remediated. Actual equipment that will be used is subject to variation based on what the successful contractor has available.

The construction will not block or impede the flow of any water, will not increase or decrease storm water runoff from current conditions, and will not cause pollution from sedimentation.

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DNR staff were on-site May 16, 2018 and provided a delineation of marshland jurisdictional limits based on vegetation and other biological indicators. These limits have been surveyed and elevations noted. The elevations of the limits are 4.8' above MSL. The proposed road improvement segment elevations range from 4.0' to 4.6' respectively at the endpoints. The lowest elevation is 3.6'.

The construction improvement is proposed to be a low-water crossing, closely following the standards of the Natural Resources Conservation Service (NRCS) practice standard. Typical x-sectional drawings from the NRCS technical guide are attached showing general construction layout and proposed elevations. This construction method is appropriate since the adjacent landowner has a pipe and ditch that should outlet across this road. The road currently has the water blocked, but this will be remedied by the construction, so water can flow freely. The addition of a 12" HDPE pipe will further ensure that water can flow freely in both directions. Proposed construction is approximately 700' away from the nearest tidal creek, Honey Creek, at the dock site.

The proposed improvement project is not located on a landfill or other known hazardous waste site.

A small staging area component to this project has been identified on the attached maps. This area, approximately one acre in size, is not jurisdictional for the Clean Water Act or Coastal Marshlands Protection Act. No impervious development will take place on this area. The area will be used for equipment parking and staging for construction activities on a temporary basis until construction is complete, possibly less than a week.

History

The Dover Bluff Club was created as a non-profit entity and was organized as a corporation with the State of Georgia on July 29, 1944. The bylaws of the corporation were revised in June 2005 to provide for specific clarifications. Generally, the purpose of the organization is to provide for fishing, hunting and other recreational activities for the membership. Members pay annual membership dues and can be assessed special fees upon an affirmative vote per the bylaws. The primary purpose of the corporation is not to generate money and it does not pay out money to the membership. The president of the corporation has signatory authority for the corporation. The original and revised corporate papers are attached.

Deed and Survey

The deed for this property is shown at the Camden County clerk's office and on tax records as being recorded in deed book 232 page 192. That document is attached.

There has never been a survey of the 5000+ acres of the property to anyone's knowledge. There is recorded at the Camden County clerk's office a map of the property boundaries compiled from records and Government survey maps dated March 1944. The work was completed by a

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JAN 10 2019

registered professional engineer, Mr. L. S. Miller. This document is recorded in Plat book 1-page 75. The document is approximately 3' by 4' in size and not reduceable in size to fit this document. The appropriate sections are attached that show the proposed access road work area is part of the Dover Bluff Club property.

Adjacent Owners

The closest adjacent owner to the proposed project is the W.C. Kirby Family Limited Partnership. Their property abuts the Dover Bluff Club property and is very near to the proposed improvement site. They own approximately 431 acres to the east of the site referenced as parcel 152 001 at the tax office with a physical address of 1209 Black Hammock Road. The mailing address of the partnership is 772 Oglethorpe Avenue; St. Simons Island, GA 31522.

The next closest adjoining property owner is to the south and west approximately 1000' across the marsh. The tax information shows ownership in the name of Heck Thomas et al. and that they own 42.4 acres. This tract is referenced as parcel 152 005. The property has no physical address shown and the mailing address is Heck Thomas Etal. c/o Hoover Atkinson; 15945 Northwest 19th Avenue; Miami, FL 33054-2023.

Zoning Letter - A complete application package was submitted to the Camden County Zoning Board for review and signatures as required by CMPP. I received a letter from Camden Co. Zoning Dept. indicating this activity is not in violation of any zoning requirements in the County since it is a "permitted" activity. The Board did not sign any plans I had submitted.

Water Quality Certification – This certification is approved as a part of the Nationwide Permit #18 that will be a part of the application process pending CMPC action. Documentation from Georgia Environmental Protection Division is attached explaining this condition.

Upland Component – There is no planned upland component related to this project as defined by the CMPP.

Erosion & Sedimentation

Adequate measures will be taken to prevent erosion and sedimentation into the marsh. Consultants working on this project are Certified Professional in Erosion & Sediment Control (CPESC #641 and #3909) and State of GA Level II Design Professional #8132. The construction footprint will be 1/10th acre or less.

Agency Coordination

A nationwide permit (NWP) application will be submitted to the US Army Corps of Engineers for this proposed improvement project. A representative has been out on site and consulted on the appropriate NWP to pursue. That application will be submitted promptly after review and action by the Coastal Marshlands Protection Committee, per the COE instructions.

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A revocable license request is being submitted concurrently to GA-DNR with this application.

Public Interest Statement & Alternatives

For many, many years, access to the dock has been across this stretch of marsh by a variety of vehicle types. There is evidence in the marsh where old brick and other materials have been placed in an effort to address trafficability issues. Therefore, it should not be construed this this is undisturbed, pristine marshland. An improved dock is expected to increase the demand to visit the dock and thereby increase traffic across the marsh. The proposed improvements are designed to be minimal, less than 1/10th of an acre. The proposed minimal improvements are designed to improve trafficability and at the same time reduce impacts to water quality. The improvements will decrease turbidity, have no impact on storm water increases or decreases, and will allow for improved surface water flow from an impounded ditch. There will not be any impounding of water or creation of stagnant areas. The natural flow of water will be maintained. The proposed improvements will not unreasonably interfere with marine life and will not impact fisheries, crabs, oysters, shrimp or clams.

There are alternatives to accessing this dock in addition to what has been proposed by this application. Obviously, access by water is a possibility but it does not satisfy the need for access by land. The road improvements proposed by this application impact almost 1/10th of an acre as a solid treatment. As an alternative, the impact could be reduced by only improving a two-lane path approximately 3' wide for each lane. This level of impact would result in approximately 0.06 acres.

The "do-nothing" alternative may be the least desirable of all. Access will continue to the dock by land. If the access is not suitable by normal wheeled vehicles, then possibly four-wheelers, golf carts or other off-road vehicles will be used. These vehicles, even though they have good flotation, are prone to do more land disturbance due to small diameter tires and higher rpm's of the tires. The land disturbance would not be considered a malicious intent, but rather a consequence of the types of vehicles that had to be used for access.

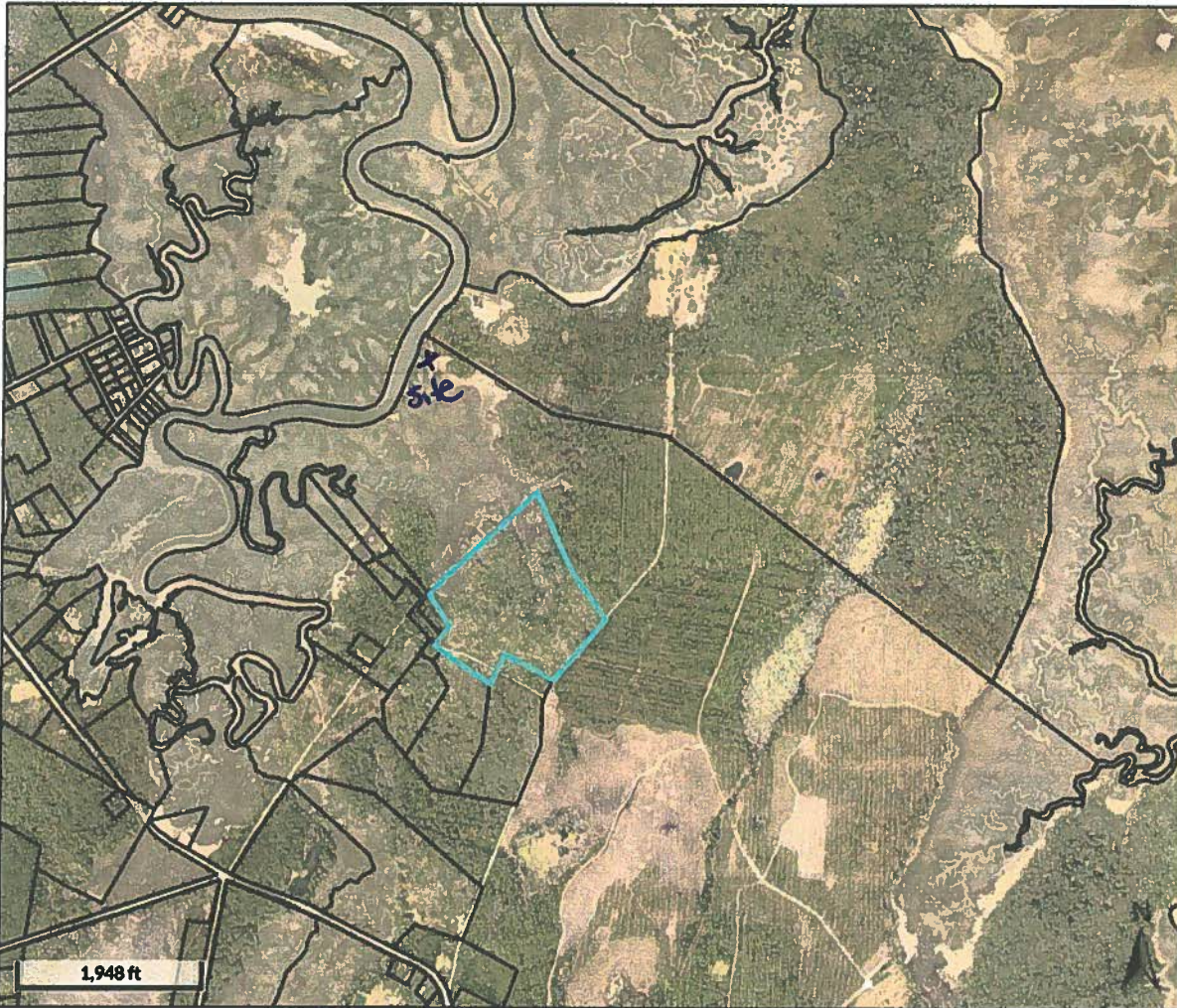
The very first alternative was to consult with the adjacent neighbor who has paved road access very close to the dock site. The neighbor was not receptive to any agreement that would allow use of his road to access the dock site.

In the public interest, this permit application has strived to review various alternatives, and most importantly, minimize any impact to the marshland. Following either a solid road improvement or a two-lane path improvement, there will still be marsh plants, marsh water, and marsh creatures that will occupy the site. The only difference will be that the roadway soil and plants will not be constantly disturbed as if it were in an unimproved state.

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Marsh & Shore Mgt. Program



Overview



Legend

-  Parcels
-  Roads
-  City Labels

Parcel ID 152 005
Class Code Consv Use
Taxing District 43 UNINCORPORATED SERVICE DIST
 43 UNINCORPORATED SERVICE DIST
Acres 42.4

Owner HECK THOMAS ETAL
 C/O HOOVER ATKINSON
 15945 NORTHWEST 19TH AVENUE
 MIAMI FL 330542023
Physical Address n/a
Assessed Value Value \$83967

Last 2 Sales			
Date	Price	Reason	Qual
11/1/1993	\$2000	NM	U
3/1/1991	0	NM	U

(Note: Not to be used on legal documents)

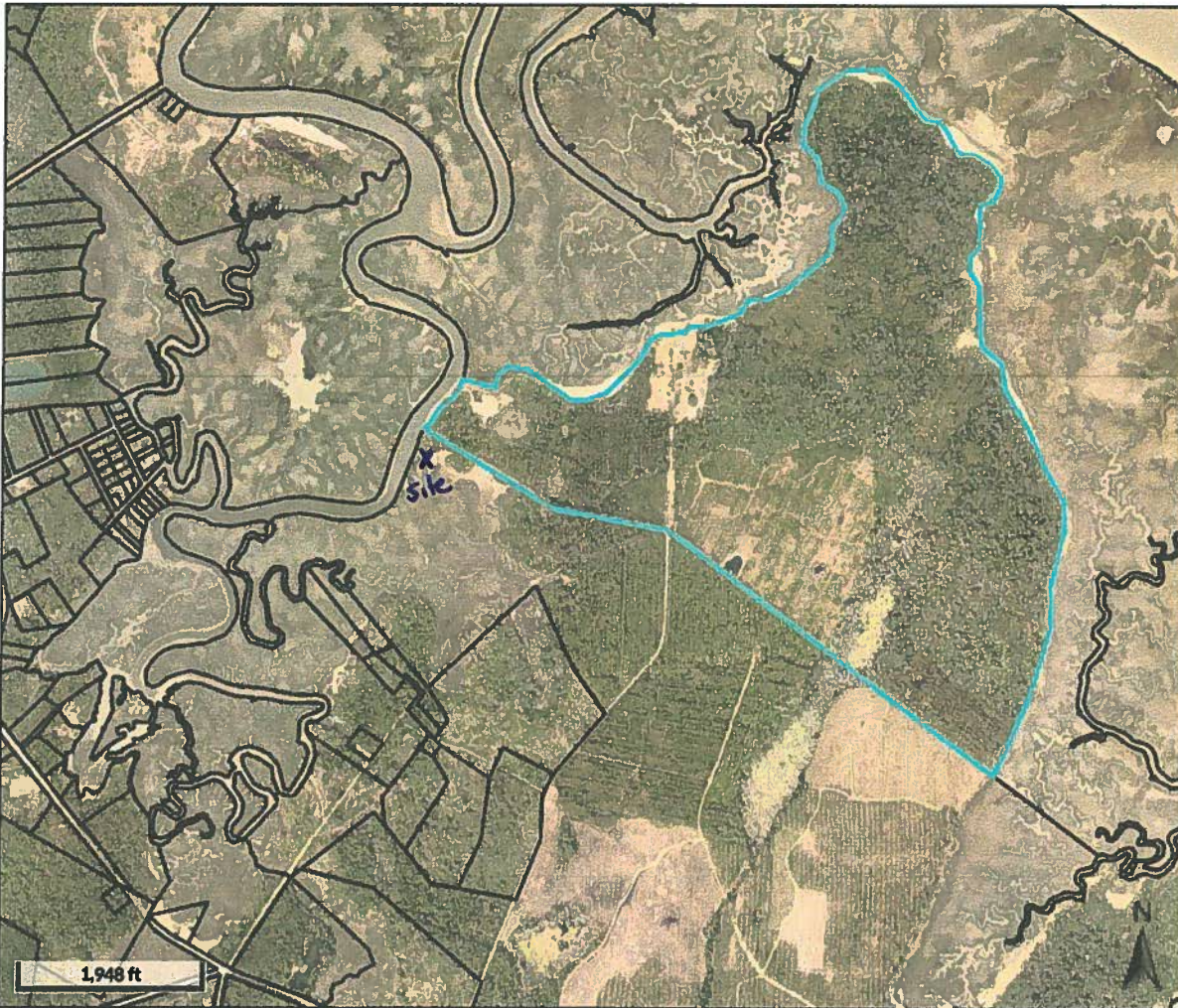
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 The Schneider Corporation

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Overview



Legend

-  Parcels
-  Roads
- City Labels

Parcel ID	152 001	Owner	KIRBY W C II FAMILY LTD- PARTNERSHIP	Last 2 Sales			
Class Code	Consv Use		772 OGLETHORPE AVENUE	Date	Price	Reason	Qual
Taxing	43 UNINCORPORATED SERVICE		SAINT SIMONS ISLAND GA 31522	9/1/1997	0	NM	U
District	DIST		1209 BLACK HAMMOCK RD	6/1/1991	0	NM	U
	43 UNINCORPORATED SERVICE	Physical Address					
	DIST	Assessed Value	Value \$575891				
Acres	431.8						

(Note: Not to be used on legal documents)

Date created: 5/24/2018
Last Data Uploaded: 5/23/2018 8:51:57 PM

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Board of County Commissioners

Office of Planning & Development

107 N. Gross Road Suite 3 • Kingsland, GA 31548

Phone: (912) 729.5603 • Fax: (912) 729.5543 • www.co.camden.ga.us

June 21, 2018

Coastal Resources Division GA DNR
One Conservation Way
Brunswick, GA 31520

RE: Dover Bluff Club Black Hammock Road project

To Whom It May Concern,

This letter is to acknowledge that the proposed maintenance and improvement to Black Hammock Road for the Dover Bluff Club. The proposed construction is a permitted use and does not require a local permit by this office.

If I may be of further assistance to you in this regard, please feel free to contact my office.

Sincerely,

Eric Landon, Director

GA DNR

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Marsh & Shore Mgt. Program



Board of County Commissioners

Office of Planning & Development

107 N. Gross Road Suite 3 • Kingsland, GA 31548

Phone: (912) 729.5603 • Fax: (912) 729.5543 • www.co.camden.ga.us

Zoning Clearance Application

This application is used to determine if any conflicts exist between your intended use of your property and the Uniform Development Code of Camden County. There is a **\$25.00 Charge** for this Zoning Clearance or Zoning letter.

Applicant Name: David Ferrell (Agent) for Dover Bluff Club Inc Telephone: 912/ 337-5548

Applicant Address: 2302 Sunnyside Drive; Waycross, GA 31501 ← *mail*

Zoning Clearance Application Address: Black Hammock Road near Honey Creek

Zoning Clearance Application Tax Map/Parcel: 153-001 Dover Bluff Club

Purpose for requesting a Zoning Clearance: Letter is required as part of a Coastal Marshlands Protection Application.

Please write a short description of the intended use of your property. (For home occupations, please be as specific as possible.)

The proposed project involves the rehabilitation of an existing access road to an existing dock, both of which have been in place over 60 years.

The area to be improved will be 1/10th acre or less and is located in jurisdictional salt marsh.

The dimensions of the proposed improvement are 10' x 430' in a single segment.

No structures will be erected or demolished as part of this project.

All improvement activity will occur in the existing footprint of the road.

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Applicant Signature: *David A. Ferrell*
For Dover Bluff Club, Inc

Date: June 14, 2018

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Planning & Development:

Approved Denied Date: _____ Signed: _____

"Georgia's Coastal Community of Choice"

STEVE L. HOWARD
County Administrator

JOHN S. MYERS
County Attorney

WILLIS R. KEENE JR.
Commissioner, District 1

CHUCK CLARK
Commissioner, District 2

JIMMY STARLINE
Commissioner, District 3

GARY BLOUNT
Commissioner, District 4

TONY SHEPARD
Commissioner, District 5

From: **Smith, Bradley** Bradley.Smith@dnr.ga.gov
Subject: **Dover Bluff Club Access Road Improvements**
Date: **Jul 3, 2018 at 9:04:44 AM**
To: **Ferrell2302@gmail.com**
Cc: **Winsness, Shannon** Shannon.Winsness@dnr.ga.gov, **Noble, Josh**
Josh.Noble@dnr.ga.gov, **Dodson, Jordan**
Jordan.dodson@dnr.ga.gov

David,

As we discussed earlier, an individual 401 WQ Certification will not be required since you will be obtaining a Nationwide Permit for the less than 1/10th acre maintenance/improvement project. A blanket 401 WQ Certification was issued March 6, 2017 for all Nationwide Permits. I've attached a copy for your reference. If you haven't already, please contact Shannon Winsness with GA EPD to determine if your project requires a buffer variance. His office/cell numbers 912.554.3492 / 912.230.4880. I've also copied him on this correspondence. Please contact me if you have any further questions.

Thanks,

Bradley Smith
GA EPD - Wetlands Unit
Watershed Protection Branch
Coastal District Office
400 Commerce Center Drive
Brunswick, Georgia 31523

Office: 912.262.3196 Mobile: 912.399.6680
Email: Bradley.Smith@DNR.GA.GOV



pdf

401 WQC 2...d Copy.pdf
544 KB

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GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

Colonel Marvin Griffin
District Engineer
U.S. Army Corps of Engineers
Savannah District
100 W. Oglethorpe Avenue
Savannah, Georgia 31401-3640

RECEIVED

MAR - 6 2017

Re: Water Quality Certification
2017 Reauthorization of Nationwide Permits
Statewide

Dear Colonel Griffin:

Pursuant to Section 401 of the Federal Clean Water Act, the State of Georgia issues this certification to the U.S. Army Corps of Engineers, Savannah District for reauthorization of the Nationwide Permits. This reauthorization extends for a period of five years from March 19, 2017

The State of Georgia certifies that there is no applicable provision of Section 301; no limitation under Section 302; no standard under Section 306; and no standard under Section 307, for the applicant's activity. The State of Georgia certifies that the applicant's activity will comply with all applicable provisions of Section 303.

This certification is contingent upon the following conditions:

1. All work performed during construction will be done in a manner so as not to violate applicable water quality standards.
2. This certification is contingent upon satisfaction of the Savannah District's Regional Conditions, including the Appendix A provisions requiring prior notification to Georgia EPD before the commencement of NWP authorized projects.
3. For bank stabilization projects conducted under NWP 13 or NWP 54, particularly those that involve work in state buffers, applicants should consult Georgia EPD's Streambank and Shoreline Stabilization Guidance, available at <http://epd.georgia.gov/technical-guidance>
4. Where the Savannah District grants a waiver to exceed the project impact limits authorized under Nationwide Permits 13, 21, 29, 36, 39, 40, 42, 43, 44, 50, 51, 52 or 54 Georgia EPD reserves the right to review such projects for consistency with Georgia's water quality rules, and where necessary, to issue individual 401 water quality certification for qualified projects.

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March C. Shore Mgt. Program

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MAR - 6 2017

5. Georgia EPD may require submission of a formal application for individual 401 water quality certification for any project if it is determined, based upon consideration of Georgia's water quality rules, that the project is likely to have a significant adverse effect upon water quality.

This certification does not relieve the applicant of any obligation or responsibility for complying with the provisions of any other laws or regulations of other federal, state or local authorities.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard E. Dunn". The signature is stylized and written in a cursive-like font.

Richard E. Dunn
Director

cc: Mr. Richard Morgan, Corps
Ms. Sarah Wise, Corps
Mr. Eric Somerville, EPA
Mr. Donald Imm, FWS
Ms. Kelie Moore, CRD

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