

**CESAS Form 19 Support Documentation  
St. Marys Boat Ramp Improvements  
Camden County, Georgia  
Revised March 20, 2018**

The following information is submitted as support documentation in association with the attached application requesting authorization to impact waters of the U.S. pursuant to Section 10 of the Rivers and Harbors Act of 1899 and the Coastal Marshlands Protection Act of 1970 pursuant to the Official Code of Georgia Annotated, Part 12-5-286 (OCGA).

**1.0 Project Description**

The City of St. Marys (applicant) is proposing to replace the existing Wheeler Street Boat Ramp which was damaged during Hurricane Irma in September 2017 and to improve the existing Kayak Dock at the City's Waterfront Park. The project is aimed at making these two public facilities safer, more structurally sound, and more efficient for public use. The project site is located on the St Marys River at the southern terminus of Wheeler Street, south of St. Marys Street, Camden County, Georgia.

**2.0 Background**

On September 11, 2017, Hurricane Irma tracked north through the Florida peninsula into southwestern Georgia. The storm's damage to St. Marys' exposed waterfront was extensive. All 9 of the existing dock structures were damaged, and many were totally destroyed. Two of the facilities damaged by the storm were the City's boat ramp at the end of Wheeler Street and the "Kayak" Dock at the City's adjacent Waterfront Park. The Wheeler Street Boat Ramp has been in-place for decades. The Kayak Dock was constructed in the early 2000's as part of the Waterfront Park project and is used for kayak docking and temporary public mooring. Both facilities are open to the public and are heavily utilized during the busy summer boating season by tourists and residents.

**3.0 Existing Conditions**

Existing Habitats

The habitats within the footprint of the proposed waterside activities consist of open water, rip-rap, and vegetated saltmarsh. The upland area consists of the existing paved boat ramp launch area and the existing grassed and maintained Waterfront Park. Upstream of the project site is the City Fishing Pier and Lang's Marina West. Downstream is the National Park Service facilities for access to Cumberland Island.

The open water habitat of the St. Marys River within the project site ranges to 20 feet deep. Much of the shoreline has been stabilized over the years with rock and rip-rap which has become scattered over the years and covered with silt and accumulated sediments from the last two hurricane seasons. Immediately adjacent to the boat ramp are a few small patches of marsh vegetation with smooth cordgrass (*Spartina alterniflora*) growing below the high water mark and sea oxeye (*Borrchia frutescens*) located above it.

Boat Ramp

The existing Wheeler Street Boat Ramp is approximately 50 years old. Prior to Hurricane Irma, the facility consisted of two ramps totaling 65' x 126' (8,190 sq. ft.) with raised concrete curbing and approximately 6,151 square feet of concrete rubble/rip-rap on both sides for stabilization. A linear dock structure extended between the two ramps and consisted of an approximate 95' x 12' (1,140 sq. ft.) fixed walkway, double 4' x 16' (128 sq. ft.) gangways, and a 60' x 15' (900 sq. ft.) float.

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### Kayak Dock

The Kayak Dock was constructed in the early 2000's as part of the Howard Gilman Memorial Waterfront Park project. The park and the dock are both public facilities. Prior to Hurricane Irma, the dock consisted of a 124' x 6' (744 sq. ft.) fixed walkway extending channelward from the park's concrete bulkhead. Straight channelward of the walkway extended a 3.5' x 33' (116 sq. ft.) aluminum gangway to a 12' x 15' float extension attached to a 12' x 39' float (648 sq. ft. total). On the western side of the float, a 12' x 4' (48 sq. ft.) gangway attached to the City's "Fireworks" Dock. The Fireworks Dock was simply a 40' x 60' (2,400 sq. ft.) concrete float that was detached and floated to the middle of the river during the City's fireworks shows. When not used for fireworks, it accommodated temporary mooring of recreational vessels at the Kayak Dock. Hurricane Irma totally destroyed the Fireworks Dock and caused some damage to the rest of the facility. Repairs have since been made to the Kayak Dock, and it is in usable and serviceable condition.

### **4.0 Project Justification**

A structural survey was completed after Hurricane Mathew struck in October 2016. The survey found significant deficiencies in the facility including deep scouring on both sides of the ramp, damage to the wooden dock structure, and cracking of the travel surface. A program was drafted to repair the facility to give it 10 more years of useable life, but before the program could be implemented, Hurricane Irma struck. Irma finished off the launch dock – ripping the float in half, dislodging pilings, and destroying the fixed walkway – and caused additional damage to the ramp itself. Further damage to the travel surface and concrete curbing occurred during the ensuing emergency repair and recovery efforts for the other facilities along the St. Marys waterfront. Additionally, Irma caused heavy accumulation of sediments on both sides of the ramp, covering the curb and travel surface on the west side lane. Today, the ramp has been closed and barricaded as it is not safe for public use. This is a significant problem not only to the public and the City, but also to the National Park Service, Coast Guard, and Navy which use the ramp for the launch and recovery of their vessels as well as to load and unload barges to Cumberland Island. The ramp is also no longer available for the National Park Service to use in case of a fire or other emergency on Cumberland Island. With the busy summer boating and tourist season approaching, loss of public boat access to the St. Marys River has the potential to cause significant economic hardship to the City.

There is a tremendous public need to return the boat ramp to a safe and reliable facility and to improve the launch and recovery capabilities for non-motorized vessels. Reliable and long term water access is not only needed by residents and visitors of St. Marys; it is also needed by the National Park Service, Coast Guard, and Navy who use the boat ramp to launch and recover their large vessels. Furthermore, the ramp is used for loading and unloading barges to Cumberland Island and has been used in the past for emergency vehicle transport and emergency supply delivery to Cumberland Island during fires. Likewise, there is a strong need for a safe and reliable launch and recovery facility for non-motorized users at the City's Kayak Dock. The Kayak Dock will also be improved upon to make better use of the space and provide more effective public mooring opportunities for temporary boaters as well as overflow docking for the boat ramp.

### **5.0 Proposed Activities in Jurisdiction**

As mentioned above, the proposed project is required to restore safe and reliable function to the public boat ramp in St. Marys and to improve the existing public Kayak Dock at St. Marys Waterfront Park.

### Boat Ramp

The applicant evaluated repairing the boat ramp in-kind with the pre-existing structures, but as discussed in more detail below, this alternative is not feasible. Instead, the boat ramp will be modified so that significant functional improvement is achieved with only a minor amount of change to the overall footprint. The existing failing concrete lanes and curbs will be removed along with adjacent rip-rap and accumulated sediments (the dock structure was already removed after Hurricane Irma as a

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safety precaution). The applicant will then re-construct the two 25' wide paved lanes at a perpendicular angle to the river facing more downstream than the existing alignment (the existing ramps point upstream towards the Kayak Down). Rip-rap will be re-installed adjacent to the ramps on both sides and grout bags will be placed at the end of the ramp totaling 5,528 square feet. The old dock location will be moved to the downstream side of the dock to avoid interference with launch and recovery activities. The new dock will consist of a 33' x 18' (594 sq. ft.) pile supported platform located at the CMPA jurisdiction line with an 80' x 4' (320 sq. ft.) gangway extending to the floating dock. The main float will be 80' x 10' with a 22' x 8' widener to be used for the gangway landing. A 30' x 10' finger and a 38' x 10' finger will extend downstream from the main float. The floating dock will total 1,656 square feet. Guide piles and/or fender piles will be installed on the upstream side of the main float, and all mooring hardware will be removed from that side of the dock to discourage mooring on the upstream side adjacent to the boat ramp. The majority of the proposed structures will be located within the footprint of the existing structures. Only the relocated/reconfigured float and gangway, as well as a small portion of the rip-rap and elevated pier will be outside the footprint of the existing boat ramp. These new impacts total **2,914 square feet**. The revised alignment of the boat ramp and revised location of the launch dock will significantly improve safety and efficiency at the ramp for the public and all state/federal agencies who use the ramp.

#### Kayak Dock

The intended function of the public Kayak Dock was to provide launching and recovery opportunities for non-motorized vessels to take pressure off of the busy boat ramp. The current configuration, however, does not afford easy launching or recovery of vessels. Over time, the Fireworks Dock became too unstable for shooting fireworks, so it was permanently spudded on the upstream side of the Kayak Dock and served as short term mooring for recreational vessels. This large rectangular footprint, however, is very inefficient as it doesn't provide much mooring space for the square footage. The applicant is therefore proposing to reconfigure the facility by removing the hammerhead-shaped float and rectangular float and replacing them with a more user friendly floating dock configuration with a dedicated kayak launch area. The existing fixed walkway and gangway will be retained as-is. The gangway will access a 17' x 32' float platform with four fingers. Extending channelward will be (2) 33' x 10' fingers. Extending upstream will be (2) 42' x 10' fingers. Between the 33' fingers will be the dedicated 16' x 16' kayak launch system consisting of various sized launch floats and a launch slip. Much of the reconfigured floating dock will be located in the same footprint as the existing float. Only **1,349 square feet** will be considered new impact. All floats will contain the appropriate mooring hardware and fender/rub-rail system along the edges.

In all, the project will reduce the total amount of structure within jurisdiction by 1,186 square feet. The new impacts (e.g. new structures outside the footprint of the existing structures) will total **4,263 square feet**. The proposed modification project therefore qualifies as a minor impact under the CMPA.

Overnight tie ups will not be allowed at the boat ramp. Overnight tie-ups will be allowed at the Kayak Dock, but no live-aboards will be allowed. No water will be provided on either dock, but appropriate lighting may be required. No fuel facilities, vessel pump outs, restrooms, laundry facilities, showers, or restaurants will be associated with either facility. The boat ramp improvements will require the removal of sediments that accumulated from Hurricane Irma, but no new deepening, fill, or bank stabilization is required for the project. The proposed dock facilities will extend no further than 89' into the waterway beyond MLW where the St. Marys River is 1,325 feet wide (MLW to MLW). The proposed project will not impact navigation in the waterway. All work will be conducted by waterborne crane and barge in a manner to minimize turbidity in the waterway, and the applicant will ensure that no oils or other pollutants are released into the waterway during construction.

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## **6.0 Upland Component:**

The upland component for the project consists of the existing paved boat ramp access and parking area. This area consists of the existing boat ramps above the mean high water mark, adjacent curbs, and the paved parking lot. It totals approximately 100' x 130' (13,000 sq. ft.). The applicant will use the upland facilities to access the waterside facilities, but no change in use or condition of the upland component is proposed. The only activities would consist of re-aligning the curbs/travel lanes as necessary to match the new boat ramps but will result in no change to stormwater runoff characteristics beyond the existing condition.

## **7.0 Avoidance and Minimization of Impacts**

Because the project consists of repair and improvement to existing water-dependent structures, alternative sites were not considered. The applicant was faced with two main alternatives for the project – either repair the structures as they previously existed or repair but improve them to provide better functionality.

In making this decision, many factors were considered. First, the old boat ramp had many deficiencies in the design and configuration. It was constructed 50 years ago and needed repairs to the travel surface and curbs. Being so old, the design is outdated and not safe. It included a long, fixed pier down the middle of the ramp with a float at the end. This is a design seen more in freshwater lakes where tidal fluctuation is not present. Boats that moored on the floats or even tied up to the fixed pier would block the boat ramp leading to congestion. The dock location also makes it difficult for the Coast Guard, Navy, and National Park Service to use the ramp for their large vessels and barges. The existing orientation of the ramp itself is also an issue. It was constructed well before the Upstream Waterfront Park, and with construction of the Kayak Dock in the early 2000's, the boat ramp now points at this dock. This alignment also means that the ramp is pointing upstream and not perpendicular with the waterline which makes launch and recovery efforts more challenging than if the ramp was perpendicular to the river. Given the extensive reconstruction efforts needed to get the ramp back to a safe operational status, and due to the significant issues associated with its alignment and outdated design, modifying the boat ramp now is the preferred alternative.

The City was also faced with a similar situation at the Kayak Dock, though the dock was already repaired after Irma so it could be used in the recovery and repair efforts throughout the City's waterfront. It did not make sense, however, to replace the pre-existing Fireworks Dock. It was not an effective mooring dock as it provided very little mooring space given its large footprint. Also, the dock is not an effective or safe launch point for non-motorized vessels such as kayaks and paddle boards. It consists of a hammerhead-shaped float with a lower level narrow platform around the perimeter with grab bars spaced throughout. The end result is that not many people use the dock and instead launch from the boat ramp. This results in further congestion at the ramp. The applicant therefore decided that in lieu of replacing the Fireworks Dock, a much better alternative was to remove the remaining hammerhead-shaped float and replace it with a more user friendly and safer floating dock that can be used for both non-motorized vessel launches and temporary recreational boat tie-ups.

The alternative of replacing the structures exactly as they were before Hurricane Irma under an Emergency Order or LOP is certainly a possibility, but it would not totally satisfy the project purpose and would maintain the pre-existing facility footprint which is more than the proposed footprint. The preferred alternative, however, incorporates the necessary modifications to make the facilities safer and more enjoyable for the public while also reducing the overall footprint and only requiring 4,263 square feet of new impact. For these reasons, the applicant chose the site plan as proposed.

## **8.0 Threatened and Endangered Species**

The property was assessed for the potential occurrence of threatened and endangered species and habitats suitable to sustain these listed species for Camden County, Georgia. The habitats found on

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site include tidal waters could potentially support shortnose sturgeon, Atlantic sturgeon, west Indian manatee, and sea turtles. The project consists of improvements to existing facilities with minimal new disturbance in the waterway. The small number of piles required by the project combined with the very large size of the river indicate that the project would have no effect on either sturgeon species. Also, the pile driving and dock improvements will have no effect on sea turtles. To avoid adverse effects on the west Indian manatee, the U.S. Army Corps of Engineers (USACE) standard manatee conditions will be employed during construction.

#### **9.0 Essential Fish Habitat**

The proposed waterside activities are located within the St. Marys River which has been identified as Essential Fish Habitat (EFH). The proposed project, however, only requires a very minimal amount of disturbance to habitat outside of the footprint of the existing ramp and rip-rap. All dock structures, with the exception of the small pierhead at the boat ramp, will be located over open water. The proposed project will utilize the existing structures and project footprints to the maximum extent practicable. It was therefore concluded that the proposed project would not adversely affect EFH.

#### **10.0 Impaired Waters**

The project site is not located within or upstream of a waterway listed on the 303(d) List of impaired waters.

#### **11.0 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-*

City of St. Marys  
Attn: Mr. John Holman  
418 Osborne Street  
St. Marys, Georgia 31558

*(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-*

See attached drawings from Ball Maritime Group, LLC

*(3) A plat of the area in which the proposed work will take place-*

A survey of the City of St. Marys is attached. It shows that the city-owned Wheeler Street right-of-way extends south of St. Marys Street to the existing boat ramp.

*(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*

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*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-*

The applicant is currently researching the deeds for the project. The attached plat of St. Marys, recorded at the courthouse, proves that the boat ramp is located within city-owned right-of-way.

*(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 of 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-*

CALVIN LANG  
POST OFFICE BOX 388  
SAINT MARYS, GA 31558

UNITED STATES OF AMERICA  
1849 "C" STREET NW, ROOM 2444  
WASHINGTON, DC 20013-7127

*(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 violate of any zoning law;*

Attached is the letter from the City of St. Marys Planning and Zoning Department certifying that the proposed activities are not in violation of the zoning ordinances of the City.

*(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.*

A check in the amount of \$100.00 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-*

All proposed structures are water dependent, and there is not a non-water dependent alternative to proposed project. It is therefore assumed that any other alternative site would require just as much or more impact. See above project description for details.

*(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-*

Since this application is for improvements to existing structures, and to the best of the City's knowledge, the property is suitable for the uses/structures proposed by this application. According to a review of the EPD Hazardous Site Inventory (Revised July 2013) there are no known Landfill or Hazardous waste materials present.

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***(10) A copy of the water quality certification issued by the department if required for the proposed project-***

It is anticipated that the project would be authorized by a Letter of Permission from the U.S. Army Corps of Engineers (USACE), and a 401 Water Quality Certification would not be required. This will be confirmed once application is made with the USACE.

***(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 land disturbing and stormwater management permits as required by the City of St. Marys and/or Camden County, Georgia.

***(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 alter natural flow of navigable waters nor will it obstruct public navigation. The proposed improvements will conform to the existing land use. The proposed structures will extend no further than 89 feet into the waterway from MLW where the waterway is 1,325 feet wide.

***(2) Whether or not unreasonably harmful or increased erosion, shoaling of channels, or stagnant areas of water will be created-***

The proposed project will not increase erosion, shoaling of channels, or create stagnant areas of water.

***(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 project 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.

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**Tobler, Paul**

**From:** Brandon Wall <B\_Wall@slighec.com>  
**Sent:** Thursday, April 5, 2018 9:01 AM  
**To:** Tobler, Paul  
**Subject:** RE: Wheeler Street Boat Ramp

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Paul,

The boat ramp will service both public recreational boating as well as landing craft/barge operations for service to Cumberland Island and other locales. So the pier will act not only as a walkway to the ramp, but also an access platform for the barges. The launch dock therefore had to be designed to accommodate both uses requiring a slightly wider pier footprint. The float/gangway location in relation to the boat ramp also had to be taken into consideration. The dock was designed so the gangway connects on the eastern side of the pier which allows the western side of the pier to be used for barge access without interfering with the public use. Narrowing the eastern side of the pier would require the gangway and float be moved closer to the boat ramp which would interfere with launch and recovery operations. Making the pier narrower on the western edge would negatively impact barge loading operations and would also create a void between the boat ramp and the access point. This area would have to be filled with rock protection to armor the slope and prevent scouring along the eastern curb.

It should also be noted that the design team went through the alternatives review process to ensure the proposed launch dock is the least impactful. One of the original concepts included two sole-purpose docks; one on each side of the boat ramp. One dock would have a long fixed pier for barge access and the other would have a pier/gangway/float for recreational uses. This alternative provides the best water access and can use narrower piers, but overall results in more impact to jurisdictional area. Another concept included a dual-purpose dock on the east side similar to what is proposed but with a longer fixed pier and a shorter gangway. Instead, the applicant reduced the pier's length to 33' and will utilize a longer gangway to reduce overall impacts. The proposed design keeps the majority of the proposed pier located over existing impacted area so that very little new impact is required.

Hope this helps clarify. Please let me know if you need anything else.

Thanks,

Brandon W. Wall  
Project Biologist  
sligh **environmental consultants, inc.**  
31 Park of Commerce Way, Suite 200B  
Savannah, Georgia 31405  
t. 912.232-0451 / f. 912.232.0453  
<http://www.slighec.com>

**From:** Tobler, Paul <paul.tobler@dnr.ga.gov>  
**Sent:** Friday, March 30, 2018 3:31 PM  
**To:** Brandon Wall <B\_Wall@slighec.com>  
**Subject:** Wheeler Street Boat Ramp



March 1, 2018

Dr. Jeff Adams – Community Development Director  
City of St Marys  
418 Osborne Street  
St. Marys, Georgia 31558

**RE: Wheeler Street Boat Ramp and Kayak Dock Improvements  
Zoning Certification  
SECI # 01-17-027.1**

Dear Dr. Adams:

The City of St. Marys is applying for a Coastal Marshlands Protection Act permit to replace the Wheeler Street Boat Ramp and improve the existing Kayak Dock at the City's Waterfront Park. The project involves removing the existing boat ramp and reconstructing a new ramp with a new launch dock as well as replacing the float at the Kayak Dock with a new float better suited for temporary mooring and for non-motorized vessel use.

At your earliest convenience, please certify (by letter and stamping or signing the attached drawings) that the activities proposed are allowable under the provisions of the zoning and building ordinances of St. Marys. Please return the certification letter and stamped/signed drawings to my attention via email. If you have any questions or require additional information, please do not hesitate to call me.

Sincerely,



Brandon W. Wall  
Project Biologist  
Sligh Environmental Consultants, Inc.



Community Development  
City Hall | 418 Osborne Street  
St. Marys, GA 31558



3.2.18



**CITY OF ST. MARYS**

418 OSBORNE STREET  
ST. MARYS, GEORGIA 31558

COMMUNITY DEVELOPMENT DEPARTMENT  
TELEPHONE: 912-510-4032 FAX: 912-510-4014

March 2, 2018

Brandon W. Wall  
Sligh Environmental Consultants  
31 Park of Commerce Way  
Suite 2008  
Savannah, GA 31405

**Re: Wheeler Street Boat Ramp and Kayak Dock Improvements  
Zoning Verification  
SECI# 01-17-027.1**

Dear Mr. Wall:

This letter is to verify that the proposed changes to the Wheeler Street Boat Ramp and Kayak Dock are in conformance with the St. Marys Municipal Code. The property is in the public Right-of-Way (ROW) of Wheeler St., in the C-1 Central Business District, and within the Maritime Heritage District, which allow dock and boating facilities, as permitted by state and federal agencies.

The attached plans are within the current ordinances and will be an added benefit to the citizens of St. Marys. Thank you for this opportunity and let us know if we can be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey S. Adams".

Jeffrey S. Adams, PhD  
Community Development Director  
City of St. Marys