

To: The City of St. Marys Planning Commission, Mayor, and Council

Regarding: Consideration of rezoning proposal re: "The Port of St. Marys Industrial & Logistic Center"

From: Alex Kearns, Chair, St. Marys EarthKeepers, 902 Ann St., St. Marys, Georgia

Date: Thursday, Feb. 18, 2016

After careful consideration of the available information regarding the proposed "Port of St. Marys Industrial & Logistics Center" (including the DRI application, response, 2003 Environmental Analysis, the rezoning application, the Staff Report etc.), attending the public meetings, and analyzing the statements made during those meetings, the Board of the St. Marys EarthKeepers has voted to oppose this project and the rezoning required to permit the creation of an industrial bargeport on the site of the former Gilman Paper Company.

While we applaud efforts to revitalize that property, it must be done in such a way as to safeguard the environment and quality-of-life of our citizens – and at this time there are far too many unanswered questions:

- Amount of truck traffic: unknown
 - Amount of rail traffic: unknown
 - Amount of barge traffic: unknown
 - The nature of the industries: unknown (On December 15, 2015, the developer, Mr. Chris Ragucci, stated that he really had no idea what these industries might be but, if we only would approve the rezoning, he was confident that some uses would be found.)
 - The extent of the ability of the City to retain the right of approval for such industries: unknown
 - The environmental impacts: unknown
- Mitigation plans regarding toxic materials on the site: unknown

We have heard much about how the City will maintain control regarding which industries may be established on the site. It should be noted that the *Coast Guard* issues permits for the handling of various types of cargoes – and the Coast Guard does NOT notify local governments when permits have been issued. One day the port may be shipping wood pellets, the next day it can be barging crude and flammable bio-fuels and hazardous materials. These materials may sit at a port for an indefinite period of time: in this case, a port that is perilously close to the downtown residential area and the St. Marys Elementary School.

What is known, from the 2003 environmental assessment, is that the site contains such toxic chemicals as Chromium, Barium, vanadium, sulfuric acid, hydrochloric acid, polychlorinated biphenyl...to name but a few. In order to protect the citizens of St. Marys, the City must stipulate that, before considering rezoning, a comprehensive clean-up proposal must be submitted and thoroughly vetted by experts.

The Planning Commission is charged with analyzing rezoning applications by following a ten-point Zoning Amendment Criteria.

The zoning request should be a logical extension of a zoning boundary which would improve the pattern of uses in general area. We cannot imagine how an industrial barge port could possibly improve the pattern of use in a residential area. Consider the noise, traffic, airborne contaminants, lighting, etc. involved in a large industrial barge port abutting single-family homes.

The fourth criterion stipulates that "the request should not create traffic which would traverse established single-family neighborhoods on minor streets, leading to congestion, noise and traffic hazards." The developer has only stated that the amount of truck traffic is unknown although it will be "considerable" and that there will be "lots and lots of trains." We have been told that primary port access would be along Finley St. What of the residents in that area: their property values, safety and quality of life?

Reviewing the remaining rezoning criteria, many issues and questions arise. Population growth is dependent, in large part, upon the assets and quality of life presented by the city. Will an industrial barge port enhance these factors? That is unknown, and the short-term goal of "offloading" the property could completely destroy any more reasonable future options.

#9 states "This request should not result in changes to market values and/or tax rates of nearby properties." It is hard to understand how property values would not be negatively impacted considering the noise, traffic, lights, dust, toxins, the activation of train access etc. involved with industrial bargeports. What impacts will be experienced by the residents of the downtown area in general? Heavy truck and train traffic could impede essential emergency services, impact the infrastructure (roads), and also have an adverse effect on residential property values.

#10 states "The request should conform to policies and recommendations contained in the St. Marys/Camden County Comprehensive Plan."

We suggest that everyone familiarize themselves with the St. Marys Mainstreet/Downtown Visioning Plan Feb. 1, 2016, presentation. The City is justifiably proud of the lengths to which it went to gather public input about the direction in which our town should go, existing assets and so forth. Note the prevalence of words like "ecotourism", "charm", "history", "peaceful" etc. In what respect does an industrial barge port with heavy truck and rail traffic, noise/dust/light pollution, and mystery-industries adhere to the stated "vision" for the downtown area?

The "facts" change with every presentation. First Mr. Ragucci spoke of a LNG (liquid natural gas) facility and a pipeline to St. Marys. (He quickly back-pedaled when questioned about his statements to the media about that.) Then he downsized the potential jobs from 5,000+ to "hundreds...maybe. In our dreams." Then he talked about "wood pellet processing."

In conclusion, in the face of so many unknown variables, the absence of a clear clean-up plan, and in the light of the expressed will of the citizens of St. Marys regarding the vision for our future, the Board of the St. Marys EarthKeepers respectfully urges the Planning Commission to deny this rezoning request.