

***DEVELOPMENT OF REGIONAL IMPACT  
FINDINGS REPORT***

**Prepared for  
City of St. Marys, GA  
DRI #2524, Port of St. Marys Industrial & Logistics Center**



*Prepared by:  
Coastal Regional Commission  
1181 Coastal Dr. SW  
Darien, GA*

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# 1. APPLICATION INFORMATION

- 1.1 Jurisdiction  
City of St. Marys  
DRI # 2524  
Port of St. Marys Industrial & Logistics Center
- 1.2 Applicant  
City of St. Marys  
418 Osborne Street  
St. Marys, GA 31558

## 2. PROJECT DESCRIPTION

### Summary

The Port of St. Marys Industrial & Logistics Center consists of the redevelopment of approximately 722 acres of the former Durango Mill Site located within the City of St. Marys, and adjacent to the North River.

The property was rezoned from I-G (General Industrial) to PD (Planned Development Mixed Use) on September 11, 2006.

The action requested is a rezoning to Planned Development to support industrial and commercial land uses planned for the site. The proposed project uses include the following: 5,100,000 SF Industrial (Manufacturing, Port Logistics, and Marine Facilities to include Barge Docks) 100, 000 SF Commercial.

## 3. PARCEL DATA

- 3.1 Size of Property  
Gross Acreage: 722 Acres; Net Developable Acres: 425 Acres @ 12,000 SF/Acre of Industrial Use

### General Location

The property is located in Southeast Georgia, in the region referred to as the Coastal Region, consisting of ten counties and thirty-five communities. The City of St. Marys is one of those thirty-five communities. The City of St. Marys is bounded by the City of St. Kingsland to the west, the City of Woodbine to the northwest.

The subject site is located generally to the north and east of Osborne Street (GA Highway 40) and bounded by the North River on the east and the airport on the west. See Figure 1.

The subject property is in St. Marys, Georgia and Camden County. According to 2014 Census Estimate, current population estimates in the City of St. Marys and Camden County are as follows:

Camden County	52,027
St. Marys	17,949

#### 4. LAND USE INFORMATION

4.1 Aerial Photograph

An aerial photograph is provided as Figure 1.

4.2 Built Features

The site is a brownfield site.

4.3 Future Development Map Designation

According to the City of St. Marys and Camden County Joint Comprehensive Plan, the site has a future development map designation of **Conservation/ Preservation**. The future land use map is provided as Figure 2.

4.4 Zoning District

According to the City of St. Marys Zoning Ordinance, the zoning designation for this property is **Planned Development**. The Zoning Map is provided as Figure 3.

4.5 Proposed Zoning – Planned Development

The action requested is a rezoning to Planned Development to support industrial and commercial land uses planned for the site. The proposed project uses include the following: 5,100,000 SF Industrial (Manufacturing, Port Logistics, and Marine Facilities to include Barge Docks) 100, 000 SF Commercial.

#### 5. CONSISTENCY AND COMPATIBILITY ANALYSIS

Consistency with the Joint Comprehensive Plan 2007 – 2027: Camden County, City of Kingsland, City of St. Marys, City of Woodbine:

The proposed development is consistent with the following City of St. Marys Vision, Comprehensive Plan Goals, Objectives and Policies.

**Vision:**

The City of St. Marys is a friendly, reawakening community with great historical heritage, coastal amenities and promising economic opportunities.

Our goals are to maintain our welcoming, small-town community atmosphere as a Georgia gateway and destination; and to remain committed to investing in our natural and cultural resources while proactively planning for continued myriad growth opportunities.

Our priorities include: creating an open and engaging community that is committed to improving quality of life through expanding opportunities for economic development and implementing policies that will foster sustainable growth.

## **7. CONSISTENCY WITH REGIONAL PLAN OF COASTAL GEORGIA**

### **7.1 Regional Development Map and Defining Narrative**

The Regional Development Map illustrates the desired future land use patterns from the regions' Areas Requiring Special Attention and the regions' Projected Development Patterns using the following categories:

- |                 |               |
|-----------------|---------------|
| a. Conservation | c. Developed  |
| b. Rural        | d. Developing |

The Regional Future Development Map illustrates the area as Developing and Developed which is consistent with the proposed development.

### **7.2 Guiding Principles of the Regional Plan**

Guiding Principles identify those overarching values which are to be utilized and evaluated for all decisions within the region. This section provides the analysis of the consistency between the proposed DRI and the Guiding Principles in the Regional Plan.

#### **Guiding Principles for Water and Wastewater**

Seven guiding principles are identified in the Regional Plan for water and wastewater:

1. Require the use of green building strategies to minimize water demand.
2. Promote the use of a standardized protocol to forecast water needs to meet reasonable future water needs throughout region.
3. Promote use of purple pipe and grey water techniques and use of surface water in addition to groundwater where appropriate.
4. Promote water conservation through use of a tiered rate system.
5. Promote the use of the best available technology, dependent on soil type, for wastewater treatment.
6. Large areas of Coastal Georgia are beyond the reach of urban wastewater infrastructure, or centralized wastewater treatment facilities. To ensure sustainable communities, require proper siting, design, construction, use, and maintenance of decentralized wastewater treatment, or ISTS (Individual Sewage Treatment Systems).
7. Pursue regional coordination in provision of water and wastewater facilities.

#### **Guiding Principles for Stormwater Management**

Five guiding principles are identified in the Regional Plan for Stormwater Management:

1. Encourage development practices and sitings that do not significantly impact wetlands and habitat areas or allow for the preservation and conservation of wetlands and habitat areas through appropriate land use practices.

2. Promote the use of coast-specific quality growth principles and programs, such as the Green Growth Guidelines, Earthcraft Coastal Communities and the Coastal Supplement to the Georgia Stormwater Management Manual, to guide site planning and development.
3. Minimize impervious coverage wherever possible. The level of impervious cover in a development, rather than population density, is the best predictor of whether development will affect the quality of water resource.
4. Develop stormwater programs across the region.
5. Pursue State-level funding for regional water quality monitoring activities due to the statewide importance of coastal waters and estuaries.

#### Guiding Principles for Transportation

Seven guiding principles are identified in the Regional Plan for Transportation:

1. Provide the forum and the support to coordinate regional multi-modal transportation, including rail, airports, and public transportation, and also the planning and development of street connectivity and transit oriented developments.
2. Promote the establishment of regional transportation compact(s) to provide a forum for local governments and MPO's to communicate and discuss transportation issues and decisions in the Coastal Region. These compacts do not replace the existing federal and State processes mandated in law, but provide a forum to communicate issues, ideas and discussions.
3. Promote coordination among agencies and jurisdictions in development of a region-wide, multi-modal transportation network, including transit, where applicable.
4. Encourage the coordination of transportation network improvements and land use planning.
5. Promote coordinated public infrastructure and school location planning with land use planning.
6. Maintain a human scale environment with context sensitive design practices.
7. Work to establish dedicated revenue source(s) for transportation improvements.

#### Guiding Principles for Historic and Cultural Resources

Eleven guiding principles are identified in the Regional Plan for Historic and Cultural Resources:

1. Encourage local governments to examine proposed development areas prior to development approval and require mitigation to significant resources.
2. Encourage development practices and sitings that do not significantly impact cultural and historical areas.
3. Maintain viewsheds of significant cultural and historic assets.

4. Maintain a range of landscapes and environments that provide diversity of habitats, species, resources and opportunities for recreation, commerce, community enjoyment and cultural practices.
5. Designate culturally and/or archaeological and/or historically significant resource management areas for potential acquisition and/or protection.
6. Educate residents and visitors regarding the statewide importance of this region's cultural and historic resources.
7. Encourage utilization and cooperation of museums, universities, foundations, non-government organizations, professional associations, and private firms to advise and monitor management.
8. Promote the establishment of partnerships for the development and utilization of incentives to restore, remediate or reuse cultural resources as appropriate.
9. Compile the traditional lore and knowledge of local people and integrate their understandings and practices into planning and development.
10. Encourage coordination among agencies and jurisdictions in developing and funding heritage conservation land uses and ensuring public access to publicly held and supported conservation areas.
11. Promote designation of Main Street and Better Home Town Communities.

#### Guiding Principles for Natural Resources

Twenty guiding principles are identified in the Regional Plan for Natural Resources:

1. Promote the protection, restoration, enhancement and management of natural resources.
2. Continue the traditional use of land and water (such as farming, forestry, fishing, etc.) as feasible, provided that any significant impacts on resources can be prevented or effectively mitigated.
3. Protect and enhance Coastal Georgia's water resources, including surface water, groundwater, and wetlands and ground water recharge areas.
4. Protect and enhance water quality, quantity and flow regimes.
5. Commit to investing in the protection of natural resources before any restoration and/or remediation is needed.
6. Encourage the restoration and protection of wetlands to provide flooding, storm and habitat protection.
7. Maintain viewsheds of significant natural resources.
8. Enhance access to natural resources for recreation, public education, and tourist attractions as appropriate within the protection mission.
9. Encourage utilization of universities, foundations, and non-government organizations to advise, monitor, and enhance management.
10. Promote the establishment of partnerships and funding mechanisms for the development and utilization of incentives to restore, rehabilitate, protect or reuse natural resources as appropriate.

11. Encourage development practices and sitings that do not significantly impact environmentally sensitive areas.
12. Promote low impact design practices that protect natural resources.
13. Promote to local governments a program of monitoring installation and impacts of individual and community docks along the coast.
14. Promote the monitoring of cumulative impacts of waterfront development along the coast.
15. Maintain a range of landscapes and environments that provide diversity of habitats, species, resources and opportunities for recreation, commerce, community enjoyment and cultural practices.
16. Encourage the development and use of a method to place a value on ecosystem services.
17. Promote the identification of innovative funding sources and development of ecosystem services markets (e.g. carbon, storm buffers, traditional land and water uses).
18. Promote the Adopt-a-Wetland program in areas that can be used as reference sites and that are within projected development areas.
19. Encourage coordination among agencies and jurisdictions in developing and funding conservation land uses and ensuring public access to publicly held and supported conservation areas.
20. Encourage coordination among agencies in studying the impacts of climate change and sea level rising.

#### Guiding Principles for Regional Growth Management

Twenty-three guiding principles are identified in the Regional Plan for Growth Management:

1. Encourage development that enhances the desired character of each of the region's cities and towns.
2. Avoid establishment of new land uses which may be incompatible with existing adjacent land uses.
3. Protect our military installations from land use changes that jeopardize their mission through creation or implementation of Joint Land Use Studies (JLUS).
4. Promote growth in those areas that can be efficiently served by infrastructure, such as water, wastewater and transportation.
5. Encourage infill development as an alternative to expansion.
6. Focus new development in compact nodes that can be served by public or community infrastructure providers.
7. Maintain and enhance the scenic character of our rural highways and county roads.
8. Encourage clustered developments, particularly in areas that are suitable and proposed for development, that maximize open spaces, protect natural, cultural and historic resources, preserve wildlife habitat, and include green, low impact development strategies.
9. Encourage local governments to allow green, low impact developments as an alternative to traditional development standards and develop incentives encouraging their use.

10. Limit development in sensitive areas located near marshes and waterways, to low impact development that maintains our coastal character, while recognizing and protecting the sensitive environment.
11. Strongly encourage that new developments have minimal impacts on vital wetlands, coastal hammocks, marshes, and waterways.
12. Discourage lot-by-lot water and wastewater treatment systems for multiple lot developments.
13. Promote green building techniques to maximize energy efficiency and water conservation and minimize post construction impacts on the environment.
14. Encourage the development of a “transfer of development rights” (TDR) program.
15. Encourage development and compliance with minimum uniform land use and development standards for all local governments to adopt within the region.
16. Encourage coordination among agencies and jurisdictions in land use planning, regulation, review and permitting.
17. Promote affordable housing options.
18. Encourage the placement of new schools near existing infrastructure.
19. Partner with state, federal, non-governmental organizations and local governments to provide guidance on critical natural areas, land conservation efforts, and land use practices within each jurisdiction. Provide assistance in all outreach efforts forthcoming from this initiative.
20. Pursue opportunities for continuing education as it relates to regional issues.
21. Encourage enactment of impact fees to defray costs of new development.
22. Consider planning and/or managing a catastrophic event.
23. Promote reduction, reuse and recycle practices.

#### Guiding Principles on Business and Industry

1. Promote strategic distributions of business and industry across the region consistent with natural, cultural, historic and industrial resource strategies and encourage partnerships and collaboration between economic development agencies.
2. Investigate ways to share costs and benefits across jurisdictional lines for both regional marketing and project support.
3. Incorporate community plans for the strategic use of land for manufacturing, distribution, etc., while recognizing and respecting natural resources and the unique differences between communities.
4. Coordinate with the Georgia Ports Authority (GPA) to identify their needs and identify mechanisms for the economic development industry to strengthen the GPA and its presence in logistics, distribution, and workforce development.
5. Leverage and incorporate the region’s military installations (Fort Stewart Army Base, Hunter Army Airfield and Kings Bay Naval Base) and the Federal Law Enforcement Training Center to recruit economic development projects.

6. Incorporate Herty Advanced Materials Development Center's experience and position as a development center for the commercialization of materials and create incentives to retain a portion of pilot plant opportunities as new Georgia industries and to assist development authorities in increasing recruitment win rates.
7. Promote the historic nature, natural beauty and successful past and present performance of Coastal Georgia as a location site for film and clean high-tech industry and as a recruitment tool for opportunities.
8. Incorporate the Center of Innovation's (COI) statewide logistics plan into a regional strategy to assist in the recruitment of companies and leverage as support for industry.
9. Coordinate federal, State and local economic development funding programs and initiatives that affect the coast.
10. Enhance workforce development by collaborating with business, industry, and planning of educational entities that provide necessary workforce skills.
11. Increase existing industry retention and expansion rates.
12. Promote downtown revitalization efforts to enhance job creation and location of business and offices within downtown areas.
13. Incorporate current and future needs for housing, infrastructure, and natural resource protection into economic development initiatives.
14. Encourage international economic developments that support strategic industry sectors.
15. Enhance economic development and tourism opportunities by increasing cross functional communication.

#### Guiding Principles for Agricultural Lands

Ten guiding principles are identified in the Regional Plan for Agricultural Lands.

1. Strongly discourage the conversion of prime farmland to urban uses as it represents a loss to the region's landscape.
2. Wise use and protection of basic soil and water resources helps to achieve practical water quality goals and maintain viable agriculture.
3. Viable agriculture is the backbone of a functioning network of agriculture, open space, and natural areas and a range of strategies should be used to ensure the value of agricultural land.
4. Promote learning about culinary traditions and culture.
5. Encourage agricultural biodiversity.
6. Promote local food traditions and provide opportunity for education of where food comes and how our food choices affect the rest of the world.
7. Promote connecting producers of foods with consumers through events and farmers markets.
8. Promote biodiversity through educational events and public outreach, promoting consumption of seasonal and local foods.
9. Promote community gardens within urban settings.
10. Encourage regional tasting events of local foods, music, talks, forums, workshops, and exhibitions in favor of local agricultural products.

## Guiding Principles for Communities for a Lifetime - Livable Communities

Twelve guiding principles are identified in the Regional Plan for Communities for a Lifetime/Livable Communities:

1. The CRC promotes the concept of Lifelong Communities – places where people of all ages and abilities have access to the public landscape and services which enable them to live healthy and independent lives.
2. For a Lifelong Community to be truly successful it must be a complete community. Complete communities include the direct characteristics that at a minimum meet the needs of the user population, but also provided for a greater civic good by including elements that are beneficial to the environment, sensitive to a broad population and embrace economic\financially feasible regimes.
3. The region will encourage and promote the underlying issues that must be included in a Lifelong Community. The seven (7) basic tenets of a Lifelong Community are:
  - a. Connectivity – the physical connection of streets, pedestrian networks and public spaces that promote ease of access, a direct coexistence with the existing urban fabric and barrier free mobility for all.
  - b. Pedestrian access and transit – focuses on the access to public or privately supported methods of mass transit-oriented forms of mobility and focuses on pedestrian forms of mobility as a primary or equal method of transportation when compared to conventional vehicular modes.
  - c. Neighborhood retail and services – proximity to vital and relevant supporting uses and services are necessary for a successful Lifelong Community. Mixture of uses, walkable streets and services oriented to a range of population needs is the context of this issue.
  - d. Social interaction – social interaction with the full range of the population is a proven requirement of lifelong communities. Pedestrian accessible streets and dwellings, a full stratum of dwelling types, community programming elements and careful placement of improvements are key components in creating a socially vibrant community.
  - e. Dwelling types – a range of dwelling types within a walkable range is crucial to meet the social, economic and physical goals of a lifelong community. Creative architectural and planning solutions, a strong but flexible regulatory framework and policies that promote efficient and sustainable methods of construction are among the crucial requirements of this issue.
  - f. Healthy living – accessibility to fitness, education, cultural and health maintenance programming elements are vital to a successful lifelong community and are the primary concerns of this issue.
  - g. Environmental and Sustainable Solutions – the creation of a complete community includes provisions for the appropriate preservation of natural and cultural resources. Promotion of sustainable construction techniques, preservation of natural and cultural resources, innovative methods of power generation and

integrated food production are among some of primary components related to successfully executing this issue.

4. The region will determine its “aging readiness” to provide programs, policies and services that address the needs of older adults.
5. The region will determine its “aging readiness” to ensure that communities are “livable” for persons of all ages.
6. The region will harness the talent and experience of older adults
7. To determine “age readiness,” local comprehensive plans should review:
  - a. Demographics;
  - b. Quantity, quality, and type of existing housing stock;
  - c. Land use patterns; and
  - d. Quantity, quality, and type of recreational needs.
8. Comprehensive plans will promote development patterns and design features to meet the needs of seniors.
9. Comprehensive plans and ordinances will promote Universal Design/Accessible Building Standards for buildings as well as recreational areas.
10. Comprehensive plans will include goals and objectives that specifically address the aging population.
11. Consider seniors and the elderly when reviewing site plans for new construction and/or renovations.
12. The region will ensure comprehensive plans permit basic services within walking distance recognizing it is a great convenience for all residents but an absolute necessity for an aging population.

## 8. REGIONAL RESOURCE PLAN AND RIR

### 8.1 The Regional Resource Plan

The Regional Resource Plan identifies Cultural and Historic and Natural Resources of regional importance. The Regional Resource Plan provides recommended best development practices, protective measures and policies for local governments to use within one mile of a regionally important resource. The proposed site is within RIR area related to wetlands and floodplains.

### 8.2 Area Requiring Special Attention

The ARSA identifies areas requiring special attention, including:

- Areas where rapid development or change of land uses are likely to occur, especially where the pace of development has and/or may outpace the availability of community facilities and services, including transportation;

According to the Regional Assessment for the Coastal Six Counties, adopted November 2008,

The subject property includes Natural Resource(S) areas (wetlands) in the ARSA Map.

### 8.3 Natural Resources

#### Green Infrastructure

The U.S. Environmental Protection Agency defines Green Infrastructure as —management approaches and technologies that utilize, enhance and/or mimic the natural hydrologic cycle processes of infiltration, evapotranspiration and reuse. This management approach attempts to keep stormwater onsite. It incorporates vegetation and natural resources as much as possible in development and redevelopment.

Green Infrastructure has a number of benefits, including reduced runoff, groundwater recharge, higher air quality, better aesthetics, reduces costs, lowers impacts on climate change, and provides environmental benefits that surpass improved water quality.

Coastal Georgia's Green Infrastructure network is defined as a natural life support system of parks and preserves, woodlands and wildlife areas, wetlands and waterways, greenways, cultural, historic and recreational sites and other natural areas all with conservation value. A potential impact as a result of premature or poorly planned conversion of land to other uses is the failure to adequately protect and conserve natural resources such as wetlands, flood plains, native vegetation, lakes, streams, rivers, natural groundwater aquifer recharge areas, and other significant natural systems. The river corridors, floodplains and tributary streams are considered to be critical green infrastructure components, as they supply key social, economic and environmental benefits for local communities and provide important habitats for wildlife.

Green infrastructure planning provides an alternative to what is common practice in many communities: conserving land on a piecemeal basis without the benefit of a large framework plan that allows a comprehensive approach to land conservation. Areas of protected open space should follow natural features for recreation and conservation purposes, including greenways that link ecological, cultural and recreational amenities.

Green Infrastructure shall be considered first in the planning process and in reviewing comprehensive plans, zoning, development review processes and performance standards.

Principles for green infrastructure include identifying what is to be protected in advance of development; providing for linkage between natural areas; and designing a system that operates at different functional scales, across political jurisdictions, and through diverse landscapes. Additional principles include sound scientific and land use planning practices, providing funding upfront as a primary public investment (for example, through a dedicated tax or other funding mechanism), emphasizing the benefits to people and nature, and using the green infrastructure as the planning framework for conservation and development. The concept of green infrastructure planning is based on a strategic approach to ensuring environmental assets of natural and cultural value are integrated with land development, growth management and built infrastructure planning at the earliest stage.

Green space or greenway land needs to be set aside for pedestrian, equestrian, and bicycle connections between schools, churches, recreation areas, city centers, residential neighborhoods, and commercial areas. Open-space, parks, trails, greenways, and natural undeveloped land are not individual but an integrated and organized system. Green infrastructure is as an interconnected system. Key physical, natural, ecological, landscape, historical, access and recreational assets contribute to the functionality of the green infrastructure network. The green infrastructure network weaves together a network of recreational and nature areas. Properly planned greenways provide efficient pedestrian linkages that can serve as alternative transportation to and from work, to services and other daily destinations. Greenway linkages serve as outdoor recreation for biking, walking, and jogging. Green infrastructure encourages the creation of transportation corridors and connections, which can foster ecotourism, tourism and outdoor recreation.

8.4 Wetlands

Information provided by the Coastal Management Division and U. S. Fish and Wildlife Service indicates the presence of wetlands on the development site. See Additional Comments section at the end of this report.

The U.S. Army Corps of Engineers (USCOE) need to be contacted to make a jurisdictional determination concerning the identified wetlands. A 404 permit will be required from the USCOE for proposed impacts to wetlands. A USCOE permit may be required for any proposed relocation of onsite water courses.

**17. COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGY (CEDS)**

17.1 Population and Employment Trends

*Table 2 County Population 2000-2030*

County	2000	2015	2030	Estimated Growth
Camden	43,664	62,257	70,997	63%

The regional population is expected to grow from its 2000 level of 558,300 to 844,200 by 2030, for an increase of 51 percent. As can be seen in Table 1, by 2030, Camden County is expected to grow by 63 percent.

The 2011 US Census reports that Camden County has a population of 50,410. The Coastal Georgia region supported 312,400 jobs in 2000, and is expected to support 435,050 in 2030. This projected 63 percent increase exceeds the 51 percent increase expected in population. County employment growth as presented in Table 3, over this same thirty-year period is projected to grow to 34 percent in Camden County.

*Table 3 County Employment 2000-2030*

County	2000	2030	Growth 2000-2030
Camden	22,500	32,00	34%

Note: due to the economic downturn starting in 2008 population growth and economic development within Camden County and the Coastal Region of Georgia has slowed.

## 18. ADDITIONAL CRC RECOMMENDATIONS

### 18.1 Public Facility Recommendations

The CRC recommends additional study to determine the potential impact to public facilities, including water system, wastewater system, transportation system, and solid waste disposal capacity.

### 18.2 Coastal Stormwater Supplement

The CRC recommends City of St. Marys adopt the CSS Ordinance and/or ensure the Coastal Stormwater Supplement (CSS) is implemented for stormwater management.

### 18.3 Regional Design Guidelines

The CRC recommends the City of St. Marys ensure that new development create an environment that contributes to the region's character. Regional Design Guidelines for the development are appropriate to implement quality growth.

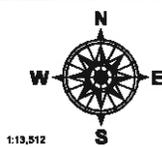
Character Area for this site could be *Southern Coastal Plan* Character Region and may utilize the Character Key for either *Commercial* and/or *Activity Areas*  
([http://www.crc.ga.gov/docs/RIR\\_CRC%20Resource%20Plan\\_NewACU\\_B\\_1\\_2012.pdf](http://www.crc.ga.gov/docs/RIR_CRC%20Resource%20Plan_NewACU_B_1_2012.pdf))

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For technical assistance contact Lupita McClenning, Director of Planning at [lmcclenning@crc.ga.gov](mailto:lmcclenning@crc.ga.gov)



**Figure 1 - Aerial Map for DRI #2524**  
 Port of St. Marys Industrial & Logistics Center



1:13,512  
 Date: 11/30/2015  
 Author: Lisa Fulton, GISP  
 Published By: Coastal Regional Commission of Georgia  
 Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere  
 Projection: Mercator Auxiliary Sphere  
 Datum: WGS 1984  
 Units: Meter

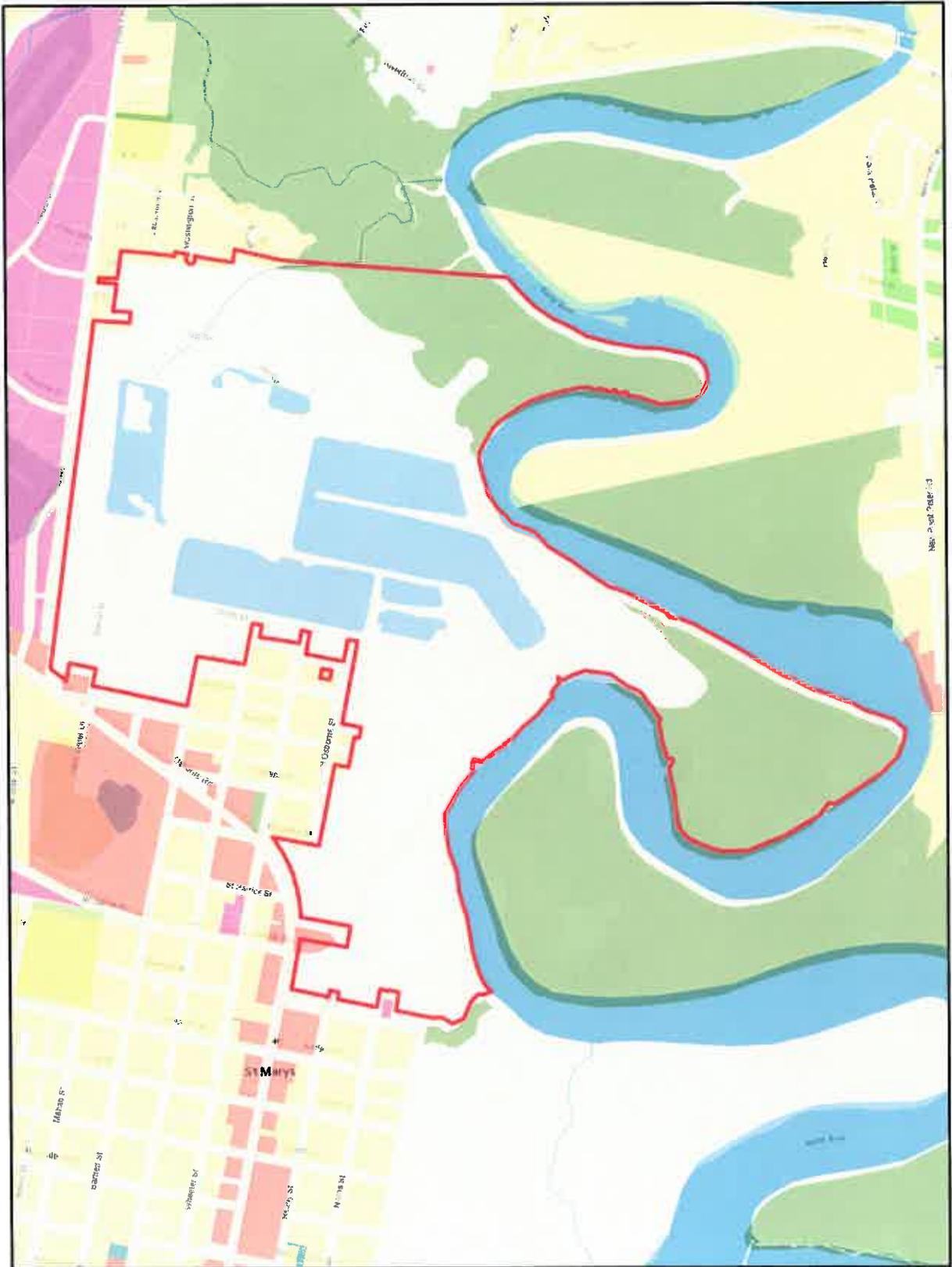
**Legend**

**Area of Interest**

 DRI #2524







**Figure 3 - Zoning Map**

Port of St. Marys Industrial & Logistics Center DRI # 2524



1:10,000  
 Date: 10/03/2019  
 Author: Lisa Patten, GISP  
 Published by: Coastal Regional Commission of Georgia  
 Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere  
 Projection: Mercator Auxiliary Sphere  
 Datum: WGS 1984  
 Units: Meter

**Zoning**

 A-F	 C-G	 E-1; I-A; I-G; I-L
 A-R	 C-P	 H-D
 C; C-1; C-2; C-3	 R, R 1-5	

M-H  DRI #2524

PD

Other



# **PUBLIC COMMENTS**

**DRI #2524, Port of St. Marys Industrial & Logistics Center**

## **List of Comments**

- 1. City of Kingsland – November 12, 2015**
- 2. Department of the Navy – November 24, 2015**
- 3. Robert Divine, Resident, City of St. Marys – November 24, 2015**
- 4. St. Marys Earthkeepers – November 24, 2015**
- 5. Southern Environmental Law Center – November 25, 2015**



## City of Kingsland

Post Office Box 250, Kingsland, Georgia 31548  
Phone: (912) 729-8296 Fax: (912) 729-4590

November 12, 2015

Bill Compton  
Coastal Regional Commission  
1181 Coastal Dr SW  
Darien, GA 31505

*Re: Response to DRI #2524*

To Sir:

The City of Kingsland supports the City of St Marys in its desire to redevelop the old Mill Site. Jobs and economic activity anywhere in the County benefit all. However, we do have some concerns with the development proposed in DRI #2524.

1. Trains should be limited to no more than 50 cars per train.
  - a. Much of Kingsland's commercial area is along the south side of Boone St. Trains passing along the rail between Boone and State Route 40 interrupt traffic, and create safety concerns.
    - 1) There is stacking room for only two cars at each of the crossings of the railroad. Trains of any great length would quickly create tie-ups along Boone, which is a service road to St Route 40.
    - 2) Businesses along Boone would be negatively affected by trains blocking access to their businesses.
    - 3) There are no emergency services south of the railroad. Should there be a blockage caused by stoppage of a train, the results could be fatal by the time emergency vehicles were detoured.
  - b. All St Marys rail traffic switches in downtown Kingsland. U.S. 17, William Avenue, and St Route 40 (King Ave) must all be crossed. Again there are concerns for both traffic and safety. Trains longer than 50 cars could block all three major intersections as well as other surface crossings limiting emergency vehicle access and creating traffic delays.
  - c. Kingsland Business Park on the south side of the railroad at 50<sup>th</sup> Street would likewise be blocked by passing trains creating business and safety concerns.
  - d. Mariners Landing likewise has only one crossing. Several businesses, a church, and 450 residences would be isolated with no alternative access should this crossing be blocked.
  - e. Switching would most likely be just north of Hilton Avenue. There is a lower income minority neighborhood including a public housing project bordering to the west that

would be severely impacted by the noise of nighttime switching operations. Signals would be needed at Hilton and Project Avenues.

2. Exit 3 needs overhead lane identification. This interchange is a half cloverleaf. Already there are problems with traffic approaching the intersection on the wrong lane of a 3-lane road expecting a normal diamond. I have seen numerous vehicles including semis cross all lanes in a very short distance to make their entrance onto I-95. Overhead signage should greatly alleviate this hazard which will only become worse with increased traffic from the port.
3. Exit 1 needs to be rebuilt. The bridge needs to be wider with truck capable turn lanes. The free access along the total frontage of the Wilco/Hess Truck Stop needs to be controlled. The intersections of Haddock Road and Lower Scrubby Bluff are too close to the exit and both have significant traffic. There are visibility issues with the southbound exit. The majority of truck traffic will probably take this exit compounding current problems.

Sincerely



Ken Kessler

Community Planning and Development Director



**DEPARTMENT OF THE NAVY**

NAVAL SUBMARINE BASE  
1063 USS TENNESSEE AVENUE  
KINGS BAY, GEORGIA 31547-2606

IN REPLY REFER TO:

5700

Ser N00/1432

NOV 24 2015

Mr. Bill Compton  
Coastal Regional Commission of Georgia  
1181 Coastal Drive, SW  
Darien, GA 31305

Dear Mr. Compton

**SUBJECT: NSB KINGS BAY GEORGIA RESPONSE TO DEVELOPMENT OF  
REGIONAL IMPACT #2524**

On 10 November 2015, your office notified Naval Submarine Base (NSB) Kings Bay regarding the Development of Regional Impact (DRI) submitted by the City of St. Marys, Georgia. The DRI addresses The Port of St. Marys, LLC's request to have property, formerly known as the Gilman/Durango paper mill site, rezoned from Planned Development Mixed Use to Planned Development Industrial Use. The DRI indicates The Port of St. Marys, LLC is proposing the development of a maritime logistics facility, specifically a bargeport to be located along the North River at the old Gilman/Durango paper mill site.

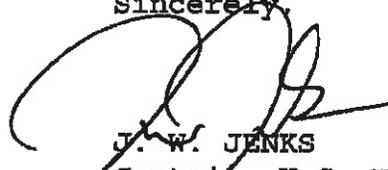
As you are aware, NSB Kings Bay is a strategic United States Naval base and home to the Atlantic Fleet's TRIDENT nuclear powered ballistic and guided missile submarines. These naval assets along with other visiting vessels utilized the intracoastal waterway to enter and exit the installation's waterfront harbors and refit facility. When transiting the restricted intracoastal waterway, industrial or recreational vessels have the potential to interfere with naval shipping. To ensure naval access, the waterway may be restricted to facilitate Naval vessel movements with little to no prior notice.

Unimpeded transit of naval assets in and out of the intracoastal waterway is vital to the NSB Kings Bay's operations and national security mission. The proposed bargeport may increase maritime traffic with slow-moving, large vessels on the same stretch of intracoastal waterway utilized by Naval vessels. Coordination of routes, shipping volume and de-confliction procedures require evaluation.

5700  
Ser N00/1432  
NOV 24 2015

Thank you for providing NSB Kings Bay the opportunity to comment on the proposed DRI, consideration of our input and your continued support of our installation, our personnel and their families. If additional information is needed, my point of contact is Ms. Cynthia Birke at (912) 573-4932 or [cynthia.birke@navy.mil](mailto:cynthia.birke@navy.mil).

Sincerely,

A handwritten signature in black ink, appearing to read 'J. W. Jenks', with a large, sweeping flourish extending to the left.

J. W. JENKS  
Captain, U.S. Navy  
Commanding Officer

## Bill Compton

---

**From:** Robert Divine <odco@me.com>  
**Sent:** Tuesday, November 24, 2015 1:18 PM  
**To:** Bill Compton  
**Subject:** St Marys Mill Site Re-zoning proposal  
**Attachments:** Mill Site Re.docx

Hello Bill:

Further to our conversation regarding the St Marys mill site re-zoning proposal, I have decided to put on record some thoughts that I am hearing from concerned citizens in St Marys.

I have served for the past year as Chairman of the Board of the Development Authority of St Marys (my term on the Board expires 11/30/15), and in that capacity I have studied this issue in some depth. However, I am writing this as a private citizen, expressing my own concerns, and reflecting those of many other St Marys citizens who feel that this issue is so important that it deserves thorough and objective study.

We do not have all the answers, of course. What we have are important questions that we feel should be considered by the Coastal Regional Commission, the Georgia Department of Community Affairs, and the St Marys City Council before this issue is decided.

This mill site represents the single most important potential for economic development in St Marys. We have had two failures in utilizing this potential: Durango in paper mill operations and LandMar in residential/commercial development. These failures have already cost St Marys and the surrounding area nearly fourteen years of missed opportunity for development. We cannot afford another failure, and there are ample indications that the proposed development starts on very questionable grounds.

With this in mind, we hope that you, CRC and DCA will give this your careful consideration. Some of these concerns have been brought to the attention of City Council members by the Development Authority over the past few months, and I am sure that St Marys citizens will insist that these and other issues be explored in public hearings to come.

Thanks for your patience in examining this proposal.

--  
Robert (Bob) Divine  
708 Grace Street  
St Marys, GA 31558  
912-673-8427 (H)  
949-500-5203 (M)

## Mill Site Re-Zoning Proposal

- Development is contingent upon “Georgia Department of Natural Resources and USACE permitting”. Development plan envisions that “3,000 linear feet of barge and vessel berthing is attainable on the North River”.

Will development require dredging of the North River to increase depth, straighten the channel or to provide for a turning basin? What are assurances that the Georgia DNR and/or the US Army Corps of Engineers (and EPA, if that agency prevails in the currently-proposed jurisdictional claim) approval can be obtained? Opposition, including legal action, can be expected from environmental groups.

Earlier studies indicate that a barge terminal at this site may not be feasible. See the study by Georgia Tech, March 1992, and the study by Georgia Southern University, February 1993.

The Georgia Southern study concluded that a barge terminal would be economically feasible only if the Gilman Paper Company utilized barge shipping for “a significant portion” of their shipments, in and out. Paper manufacturing companies such as Gilman produced great quantities of cargo suitable for barge shipping, while very few other industries (including desirable high technology enterprises) generate this type of freight volume.

The study also pointed out that “ICW barges fully laden to a draft of 8-12 feet would generally be unable to transit the North River at low water”. The depth of the North River channel, particularly at low tide, would restrict access to small ICW-type barges that are not suitable for ocean transport. Inasmuch as silting has limited the current ICW depths, north and south of St Marys, only limited intra-coastal transport can be expected. Regarding the need for dredging, Mr. Christopher Ragucci, the designated representative of the development owner, ASM Capital, has stated that no dredging would be required, although the Georgia Southern study indicated otherwise. Ocean transport would require the added cost of transferring cargo from small barges to larger barges or ocean-going ships at another location, thus impacting economic feasibility.

- The re-zoning proposal is not specific as to the type of industrial development that may be considered.

Although the proposal includes building height and set-back restrictions, it does not specify restrictions on uses that may be considered objectionable (noise, odor, light, chemical or other pollutions). Each proposed use will have to be considered by the City before issuing a permit. In each case, the choice will be between jobs for the residents and tax income, and the possible undesirability of the use, a difficult choice for elected officials. In effect, approval of the proposal effectively delegates the economic development of the site, the largest potential driver of

economic growth in the City, to a non-resident private company with unknown ultimate objectives.

- The proposal does not provide requirements for maintaining a favorable visual appearance along Osborne Street or in the Mixed Use commercial area on Meeting Street.

The Osborne Street side of the property provides the first view of downtown St Marys. It is very important that this first impression be favorable to visitors, and pleasing to the residents. The re-zoning ordinance should provide for this so that unsightly industrial buildings will not detract from St Marys' attractiveness.

- Wood Stork Rookery. The re-zoning proposal recognizes the Conservation Area but does not provide for public access for viewing.

The wood stork rookery can be a significant tourist attraction for St Marys. Bird watchers, and many visitors to Cumberland Island, would be attracted to this largest wood stork rookery on the southeast coast. Cumberland Island visitors typically go directly from the returning ferry to their cars, then leave St Marys. Having the rookery as an attraction would encourage interested visitors to extend their visits to the area, benefitting local hotels, restaurants and other merchants. Would it be possible to have this area, which is adjacent to Point Peter Road, deeded to the City? If not, can the City get a permanent easement to the property, allowing access from Point Peter Road to the east side of the rookery pond, and allowing construction of a viewing/photography stand?

- Bankruptcy Proceeds. Presumably some of the proceeds from the sale of the property by the bankruptcy trustee will be used to settle claims of creditors, many of whom are St Marys citizens.

One of the motivations for the City Council to approve the re-zoning application is to provide at least partial payment of claims of its citizens. In order to evaluate the merit of this motivation, the City Council should determine from the bankruptcy court the terms of settlement for each of the various classes of creditors, if the sale should be consummated. This information should be publicized so that citizen/creditors can know what to expect.

- There are questions regarding the general feasibility of the development proposal.

Is the developer financially capable of carrying out the plan? What is its record in similar projects? Does the developer have audited financial statements, and have the statements been evaluated by competent examiners? Has the developer ever defaulted in carrying out a similar project? Do any of the principals have a record of illegal activities? (According to public records and newspaper articles, this is an issue.) What other projects is the developer currently involved in?

While the proposal does not specify any particular intended uses of the property, earlier statements by the developer suggested consideration of uses that do not appear to be feasible, including pellet manufacturing (There are ten pellet plants currently operating in Georgia, generally located in the center of a circle of available tree raw material, unlike this site which is at the edge of a semi-circle of raw material, thus increasing inbound freight costs because of longer hauling distances; also would result in significant Highway 40 log truck traffic.), and a natural gas liquefaction plant (Kinder Morgan/Southern LNG plans to expand its large facility in Savannah, with direct ocean shipping access).

It appears that the developer either does not know or does not wish to reveal what uses are planned. In either event, the “build-out” of the proposed development is very long term (15 years), and the developer’s representative has stated publicly that no significant improvements will be made to the property until at least some of the end uses are known. Any increase in tax revenues and employment will come at some undefined point in the future. Failure to achieve these desired results may not be confirmed until after many years of missed opportunity to pursue more tangible projects.

The proposal estimates of employment in the 5,000 range appear to be extremely unrealistic. The Gilman Paper mill at this site employed only about 1,000. In general, labor-intensive industries tend to locate in Asia where labor is much cheaper. Increasingly, successful growth industries find ways to utilize fewer employees per output unit, compared to industries such as paper-making which utilize technology developed long in past. The most desirable technology industries, that have little pollution, noise, odor and truck traffic issues, generally do not employ large numbers of people in the United States.

With the limitations of vessel size and carrying capacity, how can this site be competitive with other nearby ports such as Savannah, Brunswick, Fernandina and Jacksonville that do not have similar capacity limitations and are already well-established?

In summary, the City of St Marys does not want another failed development on this site. This would tie up the property for an additional extended number of years.

Although there is a natural eagerness to “get something going”, the City Council has a responsibility to the citizens of St Marys to examine carefully the economic feasibility of this proposal AND the capability of the developer, and to approve it only if all relevant questions have been answered in a positive way. It is better to disapprove a proposal that is not likely to succeed and to wait for a better opportunity, rather than to buy into an unrealistic proposal with questionable chances for success.

All the above is not an argument against the proposed re-zoning.

It IS a call for the City Council to do a thorough job of examining all aspects of the proposal, including economic feasibility, specific plans by the developer, past experience by the developer in similar long-term projects, financial capability of the developer, examination of past legal issues of the developer and the developer's representatives, impact of environmental issues on the developer's plans, impact of the proposed property sale on the claims of St Marys businesses and citizens on the bankruptcy estate, street-front appearance issues, wood stork rookery issues, traffic issues, water and sewer usage, probability of the developer obtaining necessary approvals from Georgia DNR, US Army Corps of Engineers and other regulatory bodies, and very importantly, the wishes of St Marys citizens. The citizens of St Marys deserve that these questions be answered before a re-zoning decision is made.

Although it should have been done much earlier, perhaps now it is time for the City Council to commission an objective study of the best uses of this property; this property represents the most significant economic development opportunity that St Marys will have for many years in the future. We cannot afford to waste it!

## Bill Compton

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**From:** Alex <alexkearns1@msn.com>  
**Sent:** Tuesday, November 24, 2015 5:41 PM  
**To:** Bill Compton  
**Subject:** DRI #2524 Request for Comment

Before the proposed "Port of St. Marys" can go forward, the Coastal Regional Commission (CRC) must issue a DRI (Development of Regional Impact) statement. According to state law, the CRC is required to seek comments from "affected parties."

This afternoon was the first I heard, by happenstance, of the public comment period - **and it closes tomorrow (Nov. 25).**

I've seen no announcements, nor can I find the comment-access information on the City's website. (If I have missed something, please let me know.) One would think that the citizens of St. Marys should have been made aware of the comment period via local media and the City.

Alex Kearns  
Chair  
St. Marys EarthKeepers, Inc.  
Office: 912-673-6120  
Cell: 912-322-7367  
[www.stmarysearthkeepers.com](http://www.stmarysearthkeepers.com)  
[www.facebook.com/groups/stmarysearthkeepers](http://www.facebook.com/groups/stmarysearthkeepers)

# SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 404-521-9900

THE CANDLER BUILDING  
127 PEACHTREE STREET NE, SUITE 605  
ATLANTA, GA 30303-1840

Facsimile 404-521-9909

November 25, 2015

Coastal Regional Commission of Georgia  
Attn: Bill Compton  
1181 Coastal Drive SW  
Darien, GA 31305

Re: Development of Regional Impact #2524 – Port of St. Marys Industrial & Logistics Center

Dear Mr. Compton:

On behalf of the Satilla Riverkeeper (SRK) and St. Marys EarthKeepers, Inc., the Southern Environmental Law Center submits the following comments on the Development of Regional Impact (DRI) #2524 for the Port of St. Marys Industrial & Logistics Center. The developer, Port of St. Marys, LLC, requests a rezoning of approximately 722 acres of the former Durango Mill Site located within the City of St. Marys from Planned Development Mixed Use to Planned Development Industrial in order to support industrial and commercial land uses on the property. The stated purpose of the request is to allow for the development of manufacturing, port logistics, and marine facilities on the property.

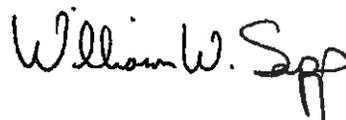
The port facility is proposed to be constructed in close proximity to state marshlands, the North River, and the St. Marys River. SRK and St. Marys EarthKeepers are concerned with the potential environmental impacts of the proposed facility and urge the Coastal Regional Commission to address the following issues in the DRI Report and the City of St. Marys to consider the following issues before approving any proposed rezoning for the area.

- 1) Wetlands and salt marsh:** SRK and St. Marys EarthKeepers are concerned with the project's location with respect to freshwater wetlands and salt marsh. The total property under review includes 165 acres of salt marsh. The property also includes U.S. Army Corps of Engineers jurisdictional freshwater wetlands. Both the Commission and the City of St. Marys should consider the environmental impacts that the facility and its construction will have on surrounding salt marsh and freshwater wetlands.
- 2) Wood stork habitat:** SRK and St. Marys EarthKeepers are concerned about the wood stork colony that has been identified on the property proposed for redevelopment. This colony has been documented nesting within a borrow pit on the property. The wood stork is listed as a threatened species under the Endangered Species Act by the U.S. Fish and Wildlife Service. The Commission and the City of St. Marys should consider the impact this development and its construction will have on wood stork habitat on the property and the health of the wood stork colony.

- 3) **Increased impervious surface:** SRK and St. Marys EarthKeepers are concerned about an increase in impervious surfaces in the area and the manner in which additional stormwater will be treated. Once the proposed development is complete, 75 percent of the site is projected to be impervious surface. The applicant states that the project will utilize on-site stormwater detention ponds and buffers. It is important to determine whether those ponds would retain all stormwater from the development or if additional stormwater will be added to the stormwater system. Additionally, the Commission and the City of St. Marys should inquire whether the ponds will be discharging stormwater into the adjacent marsh. Any discharges into the surrounding marshlands could negatively impact an environmentally sensitive area.
- 4) **Traffic and noise:** SRK and St. Marys EarthKeepers are concerned about an increase in traffic and noise from additional truck and train traffic, should this site be rezoned and industrially developed as a manufacturing and port facility. The Commission and the City of St. Marys should consider the impact that a 722-acre industrial area will have on the surrounding communities, in terms of increased truck traffic and noise.

Thank you for your consideration of these comments. Should you have any questions, please contact one or both of us at (404) 521-9900, or by email at [bsapp@selcga.org](mailto:bsapp@selcga.org) and [hbarnes@selcga.org](mailto:hbarnes@selcga.org).

Sincerely,



Bill Sapp  
Senior Attorney



Helen Barnes  
Associate Attorney