

November 16, 2012

Re: Jekyll Harbor Marina, Dredging of Tidal Waterbottoms, Jekyll Creek, Glynn County, Georgia

To whom it may concern:

The Jekyll Island Authority (JIA) has implemented an Environmental Assessment Procedure (EAP) to assess any proposed projects that are expected to significantly affect natural systems on Jekyll Island. The proposal by Jekyll Harbor Marina to dredge tidal water bottoms in Jekyll Creek and temporarily deposit the dredged material at an upland location on their Jekyll Island lease has received an initial review by the EAP Committee assigned to the project.

The EAP Committee is chaired by the JIA Director of Conservation and includes the JIA Director of Landscape and Planning, the Director of the Georgia Sea Turtle Center (GSTC), the JIA-GSTC Research Coordinator, and two outside members. The outside members for this EAP are Jason Lee of GADNR Coastal Nongame Conservation Division and Bill Anderson of Terracon.

The EAP Committee determined at its initial meeting that the proposed dredging project is potentially compatible with our conservation vision for Jekyll Island as articulated in the Jekyll Island Conservation Plan. Therefore, the EAP committee supports the proposed project on a provisional basis.

It is essential to this provisional support that the managers of the proposed dredging project remain engaged with the Jekyll Island Authority to ensure that the recommendations of the EAP Committee are addressed. A complete recommendations report will be provided to the applicant if a CMPA permit is approved. A summary of the EAP Committee's initial recommendations is included with this letter.

Thank you for your time and consideration to this matter,

Ben L. Carswell Director of Conservation Jekyll Island Authority

JEKYLL ISLAND AUTHORITY

Jekyll Island Authority, Environmental Assessment Procedure – Initial Recommendations for Jekyll Harbor Marina proposed dredging project

- The JIA Research and Conservation team should conduct a pre-disturbance wildlife survey immediately prior to preparation of the upland site to identify and relocate any wildlife of conservation priority or research interest.
- There are no currently maintained access roadways to the upland site. Therefore, the applicant must obtain approval from JIA for any access roads to be installed and utilized throughout the project from site preparation through maintenance and restoration phases.
- The upland de-watering site should be lined with an impermeable material to prevent salt-water from altering the characteristics of the underlying soil.
- All work should be completed within the months of November through February.
- The plans for returning the upland site to its natural state following removal of the de-watered material must be approved by the Jekyll Island Authority. This plan should include provisions for pre-restoration and post-restoration control of invasive plant species on the marina's lease plot.

Jekyll Island Environmental Assessment Procedure (EAP):

Recommendations report summarizing the findings of the EAP Committee considering the proposed dredging and semi-permanent upland disposal site at Jekyll Harbor Marina

Date of EAP Committee meeting: 5/23/2013

EAP Committee Members

Ben Carswell, Director of Conservation, JIA (chair, present) Kimberly Andrews, Research Coordinator, JIA (present) Cliff Gawron, Director of Landscape and Planning, JIA (present) Terry Norton, Director of the Georgia Sea Turtle Center, JIA (present) Jason Lee, Program Manager, GADNR, Non-Game Conservation Section Bill Anderson, Senior Principal, Terracon

Proposal under consideration

Jekyll Harbor Marina (JHM) has secured the necessary permits from the Coastal Marshlands Protection Committee, USACE, and Glynn County to proceed with dredging of the water bottoms immediately surrounding the marina docks. This work is believed to be necessary to continue to provide the services to boaters that JHM has been able to provide in the past. The dredged area will be 1000 feet in length and 150 feet wide at its widest point. The upland dewatering site will be 245 ft. by 100 ft. in extent and will be approximately 7.5 feet high. The dewatering site will utilize geo-tubes to dewater the dredged "spoil" material. This method is considered one of the most environmentally responsible methods of managing dredge spoil. Due to continued sediment accumulation, JHM anticipates a continuing need for the upland dewatering site and therefore us unable to commit to returning the site to a natural condition in the foreseeable future. This last point is a change from the project as previously described to JIA and therefore required reconsideration through the EAP Committee.

Assessment

The EAP Committee finds that the proposed dredging project and semi-permanent dredge spoil dewatering site do not compromise the Jekyll Island Conservation Plan. The habitat to be displaced by the disposal area is relatively small, is not a priority habitat, and is not believed to be directly supporting any priority species. The Committee recognized that the habitat value of the land to be affected is relatively low and considered seriously the message delivered by the marina ownership and management that the viability of the marina depends on this project. Therefore, the Committee recommends that the JIA approve, contingent upon acceptance of the recommendations below, JHMs request to proceed with the project as soon as possible with the support of the JIA as outlined below.

Recommendations

Jekyll Harbor Marina (JHM) responsibilities

- JHM should confirm its intentions regarding the liner material to underlay the dewatering site. The committee believes that an impermeable liner material would be preferred to prevent salt contamination of the underlying soil. If JHM has considered using an impermeable liner and does not believe that this is a feasible or preferable option, a written justification expressing this reasoning should be provided to the JIA.
- JHM should provide the JIA with a detailed plan describing anticipated dates of phase 1, phase 2, and maintenance dredging. Best estimates of time-of-year, volume of dredged material, and duration of dredge activities should be provided for each.
- JHM should provide the JIA with a detailed description or concept drawings of the landscaping berms proposed to be created out of the dewatered dredge spoil material for design approval before construction of these berms may begin. Any other use of this material on Jekyll Island should be expressly approved by the JIA.
- JHM should retain responsibility for controlling priority invasive plants, such as tamarisk, Chinese tallow, and Chinaberry, should such plants colonize the marina's leased land as a result of spoil dewatering or spoil use in landscaping.
- JHM should retain responsibility for disposal or JIA-approved use of all material in the dredge spoil disposal site even in the event that JHM closes for business (in accordance with terms of lease).
- JHM should be responsible for developing and implementing a restoration plan in coordination with the JIA for returning the upland de-watering site to a natural condition in the event that five years elapse without an identified need for continued dredging.

Jekyll Island Authority (JIA) Responsibilities

- The JIA should approve JHMs request for a tree-permit to allow site preparation activities to proceed contingent upon mitigation measures to be identified in the permit.
- The JIA should provide JHM with an affordable option for disposal of vegetation debris generated during site-preparation of the upland spoil-dewatering site.
- The JIA should support JHMs bid to use the Andrews Island dredge spoil area for disposal of dewatered spoil material not used for approved purposes, such as landscaping berms, on JHM leased land.
- The JIA should support any application on the part of JHM for grants related to improving sanitation, waste disposal, or sustainability at the marina.

The undersigned have read the recommendations of the EAP Committee and agree to institute these recommendations for the project in question. The project manager may appeal a recommended action that is believed to be unreasonable or not feasible by providing justification in writing to the Director of Conservation.

Project manager:	
Signature:	Date:
JIA coordinator:	
Signature:	Date: