

**Shore Protection Act Application
Last House, LLC
510 Ribault Lane
Sea Island, Georgia**

1.0 Introduction:

Last House, LLC proposes to undertake activities within the Shore Protection Act (SPA) jurisdiction at 510 Ribault Lane, on Sea Island, Glynn County, Georgia (latitude 31.181984°, longitude - 81.345437°). The activities proposed within SPA jurisdiction, depicted on the proposed site plan titled *Noonan Residence, Cottage 85, 510 Ribault Lane, Sea Island, Georgia*, dated April 20, 2017 (Attachment G) include the following:

- Construction of pool and pool deck
- Construction of fire pit
- Regrading of existing lawn and installation of stormwater inlets
- Installation of underground stormwater retention
- Installation of new lawn and native landscaping

2.0 Existing Conditions:

The subject property is located on Ribault Lane on the Atlantic Ocean (Attachment F, Vicinity Map). The SPA jurisdiction line was verified by the Coastal Resources Division (CRD) staff on August 30, 2016 and is depicted on the survey produced by Shupe Surveying Company, P.C. titled *A Boundary, tree, Topographic And SPA Jurisdiction Line Survey Of: Lots 122 & 123, Block 11, And Additional Property, Sea Island Subdivision No. 1*, dated August 25, 2016, (Attachment H).

The subject lot total area is 29,387 ft², of which 6,221 ft² is under the jurisdiction of the SPA. The lot currently has a house, and the area within jurisdiction consists of lawn and landscaping. A concrete seawall is located seaward of the lot boundary.

3.0 Project Description

The applicant proposes to regrade the existing lawn and landscape areas to facilitate control of stormwater. Existing elevations range from approximately 10' to 14.6'. The area will be regraded to contours ranging from +/-13' to +/-9', sloping to the north and south to direct stormwater into two (2) stormwater inlets. Stormwater would be stored in an underground detention system to alleviate accumulation of additional stormwater on adjacent lots and streets. The applicant also proposes to construct a portion of a pool and pool deck in jurisdiction. South of the pool, a portion of a patio and fire pit would extend into jurisdiction. The remaining area within jurisdiction would be landscaped with native vegetation and lawn. Construction screening and applicable erosion control measures will be installed during construction as necessary to comply with local ordinances, and will be removed upon completion of the project. Only 195 ft² (3%) of permanent hardscape (pool, pool deck, and fire pit) would be constructed in jurisdiction. Approximately 9,666 ft² (97%) of the jurisdictional area would remain in its natural or improved vegetative and topographic condition.

4.0 Landfill / Hazardous Waste

According to the Hazardous Site Index for Georgia, the subject property is not located over a landfill or hazardous waste site and is otherwise suitable for the proposed project.

5.0 Requirements and Restrictions Regarding Issuance of Permit

As discussed below, the proposed project meets the requirements under which a permit should be granted:

O.C.G.A. § 12-5-239(c) states:

(c) No permit shall be issued except in accordance with the following provisions:

(1) A permit for a structure or land alteration, including , but not limited to, private residences, motels, hotels, condominiums, and other commercial structures, in the dynamic dune field may be issued only when:

(A) The proposed project shall occupy the landward area of the subject parcel and, if feasible, the area landward of the sand dunes;

There are no dunes located on the subject property. An existing concrete seawall separates the property from the dunes and beach area along this property. All activities are located within previously developed areas.

(B) At least a reasonable percentage, not less than one-third, of the subject parcel shall be retained in its naturally vegetated and topographical condition;

97% of the SPA jurisdictional area will be maintained in an existing or improved vegetative and topographic condition.

(C) The proposed project is designed according to applicable hurricane resistant standards;

The project will comply with the most current applicable hurricane standards. A letter from Thomas Thaddeus Truett, Georgia Registered Landscape Architect No. RA012459, dated April 24, 2017 certifying the design is included in Attachment E.

(D) The activities associated with the construction of the proposed project are kept to a minimum, are temporary in nature, and, upon project completion, restore the natural topography and vegetation to at least its former condition, using the best available technology;

97% of the SPA jurisdictional area will be maintained in an improved vegetative and topographic condition. Any impacts associated with construction of the proposed project will be restored to at least their former condition.

(E) The proposed project will maintain the normal functions of the sand-sharing mechanisms in minimizing storm-wave damage and erosion, both to the unaltered section of the subject parcel and at other shoreline locations.

The proposed activities are located within previously developed areas landward of an existing sea wall. No dunes or sand-sharing habitat is located in the project footprint. The proposed activities will not affect the normal functions of the sand-sharing system at the project area or at other shoreline locations.

(2) No permits shall be issued for a structure on beaches, eroding sand dune areas, and submerged lands; provided, however, that a permit for a pier, boardwalk, or crosswalk in such an area may be issued, provided that:

(A) The activities associated with the construction of the proposed land alterations are kept to a minimum, are temporary in nature, and, upon project completion, the natural topography and vegetation shall be restored to at least their former condition, using the best available technology,

No structures are proposed on beaches, sand dunes, or submerged lands.

(B) The proposed project maintains the normal functions of the sand-sharing mechanisms in minimizing storm-wave damage and erosion, both to the unaltered section of the subject parcel and at other shoreline locations.

No structures are proposed on beaches, sand dunes, or submerged lands. The proposed activities will not affect the normal functions of the sand-sharing system at the project area or at other shoreline locations.

(3) A permit for shoreline engineering activity or for a land alteration on beaches, sand dunes, and submerged lands may be issued only when:

(A) The activities associated with the construction of the proposed project are to be temporary in nature, and the completed project will result in complete restoration of any beaches, dunes, or shoreline areas altered as a result of that activity;

No shoreline engineering activities or land alterations are proposed for this project.

(B) The proposed project will insofar as possible minimize effects to the sand sharing mechanisms from storm-wave damage and erosion both to the subject parcel and at other shoreline locations;

No shoreline engineering activities or land alterations are proposed for this project.

(C) In the event that shoreline stabilization is necessary, either low-sloping porous rock structures or other techniques which maximize the dissipation of wave energy and minimize shoreline erosion shall be used. Permits may be granted for shoreline stabilization activities when the applicant has demonstrated that no reasonable or viable alternatives exist; provided, however, that beach restoration and renourishment techniques are preferable to the construction of shoreline stabilization activities;

No shoreline engineering activities or land alterations are proposed for this project.

6.0 Public Interest Statement

O.C.G.A. § 12-5-239(i) states:

(i) In passing upon the application for a permit, the permit-issuing authority shall consider the public interest which for the purposes of this part shall be deemed to be the following considerations:

(1) Whether or not unreasonably harmful, increased alteration of the dynamic dune field or submerged lands, or function of the sand-sharing system will be created;

The proposed activities are located within previously developed areas landward of an existing sea wall, where no dunes or sand-sharing system is present. The activities proposed will not affect or unreasonably alter submerged lands or functions of the sand-sharing system.

(2) Whether or not the granting of a permit and the completion of the applicant's proposal will unreasonably interfere with the conservation of marine life, wildlife, or other resources;

The proposed project is located within an existing residential yard and will not unreasonably interfere with the conservation of marine life, wildlife, or other resources. All lighting associated with the project will be installed in accordance with DNR Wildlife Resources Division's sea turtle nesting guidelines as well as Glynn County lighting regulations.

(3) Whether or not the granting of a permit and the completion of the applicant's proposal will unreasonably interfere with reasonable access by and recreational use and enjoyment of public properties impacted by the project.

The project will not interfere with access to or use and enjoyment of public properties. The proposed project will be conducted entirely on private property.

7.0 Warranty Deed

The warranty deed conveying the subject property from Schoonoord, LLC to Last House, LLC, on September 23, 2016, filed and recorded on September 27, 2016 at the office of the Clerk of Superior Court of Glynn County, Georgia, is included as Attachment B. Also attached is a quit-claim deed from Schoonoord, LLC conveying additional property to Last House, LLC, also filed and recorded on September 27, 2016 at the office of the Clerk of Superior Court of Glynn County, Georgia.

8.0 Vicinity Map

A location map of the subject property is included as Attachment F.

9.0 Adjoining Property Owners

The adjoining property owners are depicted in Attachment C.

10.0 Zoning Certification

Zoning certification from Glynn County Planning & Development has been applied for. A copy of the request is included as Attachment D.

11.0 Hurricane Certification

The project will comply with the most current applicable hurricane standards. A letter from Thomas Thaddeus Truett, Georgia Registered Landscape Architect No. RA012459, dated April 24, 2017 certifying the design is included in Attachment E.

12.0 Permit Drawings

The proposed activities within jurisdiction are depicted on the drawing titled *Noonan Residence, Cottage 85, 510 Ribault Lane, Sea Island, Georgia*, dated April 20, 2017 (Attachment G).

13.0 Application Fee

A check for the application fee of \$100.00 has been submitted upon delivery of the application.



July 5, 2017

Ms. Jordan Dotson, Coastal Permit Coordinator
Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way, Suite 300
Brunswick, Georgia 31520

RE: Last House, LLC / 510 Ribault Lane, Sea Island, Glynn County, Georgia

Dear Ms. Dotson:

I refer to your letter of June 8, 2017, regarding the application by Last House, LLC to conduct activities within Shore Protection Act (SPA) jurisdiction at 510 Ribault Lane, on Sea Island, Glynn County, Georgia. Listed below are your requests, followed by the applicant's response:

1. *Adjoining property owners to the northwest.*

Applicant's response: Sea Island Acquisition, LLC is the owner of the land adjacent to the jurisdictional area. Attached is a copy of the county tax assessor's map for Parcel 05-00585, owned by Boone A. Knox.

2. *An alternative site description;*

a. *Include narrative of why the pool cannot be more landward of the SPA jurisdiction line.*

Applicant's Response: As you are aware, the Coastal Marshlands Protection Act requires a discussion of alternative sites as stated at O.C.G.A. § 12-5-286(b)(8):

(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;

As you are also aware, there is no such requirement to evaluate alternative sites found in the Shore Protection Act. There is, however, a requirement to discuss alternative methods specific to shoreline stabilization projects, found at O.C.G.A. § 12-5-239(c)(3)(C):

*In the event that shoreline stabilization is necessary, either low-sloping porous rock structures or other techniques which maximize the dissipation of wave energy and minimize shoreline erosion shall be used. Permits may be granted for shoreline stabilization activities when the applicant has demonstrated that no reasonable or viable **alternative** exists; provided, however, that beach restoration and renourishment techniques are preferable to the construction of shoreline stabilization activities;*

The applicant has submitted an application that meets the requirements of the SPA found at 12-5-239(c), as stated in the application on page 3:

(c) No permit shall be issued except in accordance with the following provisions:

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(1) A permit for a structure or land alteration, including, but not limited to, private residences, motels, hotels, condominiums, and other commercial structures, in the dynamic dune field may be issued only when:

(A) The proposed project shall occupy the landward area of the subject parcel and, if feasible, the area landward of the sand dunes;

There are no dunes located on the subject property. An existing concrete seawall separates the property from the dunes and beach area along this property. All activities are located within previously developed areas.

(B) At least a reasonable percentage, not less than one-third, of the subject parcel shall be retained in its naturally vegetated and topographical condition;

97% of the SPA jurisdictional area will be maintained in an existing or improved vegetative and topographic condition.

(C) The proposed project is designed according to applicable hurricane resistant standards;

The project will comply with the most current applicable hurricane standards. A letter from Thomas Thaddeus Truett, Georgia Registered Architect No. RA012459, dated April 24, 2017 certifying the design is included in Attachment E.

(D) The activities associated with the construction of the proposed project are kept to a minimum, are temporary in nature, and, upon project completion, restore the natural topography and vegetation to at least its former condition, using the best available technology;

97% of the SPA jurisdictional area will be maintained in an improved vegetative and topographic condition. Any impacts associated with construction of the proposed project will be restored to at least their former condition.

(E) The proposed project will maintain the normal functions of the sand-sharing mechanisms in minimizing storm-wave damage and erosion, both to the unaltered section of the subject parcel and at other shoreline locations.

The proposed activities are located within previously developed areas landward of an existing sea wall. No dunes or sand-sharing habitat is located in the project footprint. The proposed activities will not affect the normal functions of the sand-sharing system at the project area or at other shoreline locations.

3. Scaled drawings;

a. The site drawings need to clearly depict all permanent impacts within the SPA jurisdiction area.

i. On the supplied drawing, it appears that the pool hardscape occupies more area seaward of the SPA jurisdictional line than is labeled;

b. A scale needs to be on the drawings

c. Drawings of the underground stormwater detention system.

Applicant's response: All permanent regulated impacts have been shown on the attached plan titled DNR/SPA Jurisdiction Approval Plan, dated June 21, 1017. Permanent impacts are to take place within previously developed areas and include portions of a pool, pool deck, and fire pit.

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The underground stormwater detention system is a temporary impact; once installed, the ground will be graded to elevations to implement stormwater management and replanted with lawn (3,640 ft²) and shrub/buffer plantings (2,836 ft²). Permanent impacts of only 195 ft² for the pool, pool deck, and fire pit will occur, representing only 3% of the SPA jurisdiction area.

The drawing has been produced at an architectural scale of 3/32" = 1'0". The drawing includes the underground stormwater detention system.

4. A description of the proposed project;

- a. Detailed narrative describing the installation of the underground stormwater detention system including all phases (excavation, fill type, associated infrastructure, and grading) and where the overflow of the underground detention system will discharge to;**
- b. The total temporary impacts and any permanent impacts associated with the installation of the underground stormwater detention system need to be provided. Any impacts associated with the underground stormwater detention system that do not retain the naturally vegetated and topographical condition would be permanent impacts and must be included in the total permanent impacts;**
- c. Are there plans for the installation of any irrigation within the SPA jurisdiction area?**
 - 1. If so, any irrigation needs to be included in the drawings and project description.**
- d. There is an existing walkway within the SPA jurisdiction area that begins landward of the SPA jurisdiction line and terminates seaward of the jurisdiction line at a sitting area on top of the concrete seawall. Are there any improvements planned for these areas, the walkway or the sitting area?**
 - i. If these areas are to remain, they need to be included in an updated scaled drawing, as well as the calculated permanent impacts within SPA jurisdiction.**
- e. Any documentation regarding Sea Island Acquisition requiring a stormwater management unit/plan.**

Applicant's Response: Installation of the underground stormwater detention system would occur prior to installation of landscaping concurrent with construction of house and pool. Area would be excavated to design depth, the chambers and piping would be installed, and then backfilled with the previously excavated material. Post-construction elevations would be contoured to allow drainage to enter into the inlets located at the north and south edge of the property. Stormwater from both the grate inlets in the lawn and from downspouts and other capture locations outside of jurisdiction would enter into a system of PVC piping, and be transported to the stormwater chambers, which are also constructed of PVC (see Sheet C-2). No overflow is provided. Requirements for on-site stormwater detention are found in the Sea Island Covenants, Sixth Amendment to the Declaration of Restrictions and Conditions, Limitations, Easements, Rights, Privileges, etc. for Sea Island Subdivision No. 1, Section Architectural Review Guidelines and Standards for Sea Island Subdivision No. One (Revised) Extensions No. 1 and No. 2 (February 19, 2008), page 10, item 4; Grading and Drainage. This requirement is depicted on Sheet C-1 of the site plans.

Temporary impacts in jurisdiction would be equal to the lawn and landscaped areas, which have

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already been provided at 3,640 ft² and 2,386 ft² respectively. Irrigation for landscaping will be provided, including within SPA jurisdiction. The irrigation system will be installed below grade, within the landscaped and lawn area. The exact placement and number of sprinkler heads has not been determined. Since the installation will be within the already accounted for landscaped areas, the exact location is irrelevant, and is a temporary impact occurring only during installation during grading and landscaping activities.

The existing walkway is not located on the applicant's property. No improvements to this feature are proposed.

5. ***A certificate or letter from the local governing authority or authorities of the political subdivision in which the property is located stating that the applicant's proposal is not violative of any zoning law;***

Applicant's Response: A letter from Glynn County Community Development Department was received on June 11, 2017 in response to a request dated April 27, 2017. A new request will be forthcoming due to the requested revisions to the site plan.

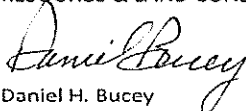
6. ***Plans signed by the local zoning authority.***

Applicant's Response: A letter from Glynn County Community Development Department was received on June 11, 2017 in response to a request dated April 27, 2017. A new request will be forthcoming due to the requested revisions to the site plan.

It is our opinion that the applicant has submitted a complete application as required under O.C.G.A. § 12-5-238. We respectfully request that you place the proposed project on notice and continue processing the application.

In advance, we thank you for your assistance with this project. If you should have any additional questions, please contact me at your earliest convenience.

Sincerely,
RESOURCE & LAND CONSULTANTS


Daniel H. Bucey
Principal

cc: ThomasThaddeus Truett, AIA
Mr. David Wentworth; Sea Island

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