

January 15, 2018

**Shore Protection Act Permit Application
O.C.G.A. § 12-5-230**

**For:
Lodge Cottages**

**Applicant:
Sea Island Acquisition, LLC
c/o Mr. William McHugh**

**Prepared By:
Resource & Land Consultants, LLC**



GA DNR

JAN 16 2018

Marsh & Shore Mgt. Program

**Shore Protection Act Application
Sea Island Acquisition, LLC
115 Retreat Avenue
St. Simons Island, Georgia**

1.0 Introduction:

Sea Island Acquisition, LLC proposes to undertake land alteration activities within the Shore Protection Act (SPA) jurisdiction at 115 Retreat Avenue, on St. Simons Island, Glynn County, Georgia (latitude 31.137578°, longitude -81.406957°). The activities proposed within SPA jurisdiction, depicted on the proposed site plan titled *SPA Exhibit, Lodge Cottages, Saint Simons Island, GA*, dated December 13, 2017 (Attachment G) include the following:

- Removal of existing concrete cart path
- Re-grading and re-grassing of existing tee boxes to construct putting/chipping green
- Installation of storm water pipe

2.0 Existing Conditions:

The project area is located on a portion of the Sea Island Lodge property, on the Plantation golf course, fronting on St. Simons Sound. The driving range and Golf Performance Center is located to the west, the Lodge is located to the north, and the 10th fairway is located to the east. The area within SPA jurisdiction consists of portions of the 10th fairway, including existing tee boxes, cart paths, and landscaped areas adjacent to the marsh that borders the sound. The SPA jurisdiction line was verified by the Coastal Resources Division (CRD) staff on September 5, 2017 and is depicted on the survey produced by Shupe Surveying Company, P.C. titled *Survey For: Sea Island Acquisition, LLC, CMPA & SPA Jurisdiction Survey Of: The Lodge At Sea Island Golf Course*, dated September 18, 2017 (Attachment H). The project area contains 79,714 ft² (1.83 acres) of SPA jurisdiction.

3.0 Project Description

The applicant proposes to conduct activities within jurisdiction necessary to renovate the golf course, specifically the conversion of the existing tee boxes at the 10th hole into a putting and chipping green to be incorporated into the Golf Performance Center. This activity would result in the re-grading of 15,681.6 ft² (0.36 acre) of the existing tee boxes and fairway. In place of the tee boxes, a practice putting and chipping green would be constructed with a finished elevation ranging from 8 to 10 feet. A sand bunker would be located along the north and east side of the green. Additionally, the project would result in the removal of 4,791.6 ft² (0.11 acre) of exiting concrete cart path. Once removed, the disturbed area from where the cart paths were removed will be graded and grassed as part of the putting green feature. To facilitate drainage of the roof of the new Lodge Cottages located outside of SPA jurisdiction, a storm drainage pipe would be installed in the western edge of the project area, resulting in 435.6 ft² of temporary impact during burial of the pipe. A summary of the proposed alteration within jurisdiction is depicted in Table 1.

As proposed, the alterations within jurisdiction total 20,908.8 ft² (0.48 acre), which represents 26% of the jurisdictional area. Seventy-four percent (74%) of the area within jurisdiction would remain in its natural state.

GA DNR

JAN 16 2018

Table 1: SPA Activity Summary Table

PROPOSED ACTIVITY	AREA (SQUARE FEET)
Re-grading of tee boxes for putting/chipping green	15,681.6
Cart path removal	4,791.6
Drainage Pipe	435.6
Total	20,908.8

4.0 Landfill / Hazardous Waste

According to the Hazardous Site Index for Georgia, the project area 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;

The proposed project is located in the landward portion of the SPA jurisdictional area, landward of dunes and coastal marshlands. 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;

Seventy-four percent (74%) of the SPA jurisdictional area will be maintained in its existing vegetative and topographic state.

(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 Mr. Johnathan Roberts, P.E. dated January 15, 2018, 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;

Seventy-four percent (74%) of the SPA jurisdictional area will be maintained in its existing vegetative and topographic state. Any impacts associated with construction of the proposed project will be restored to 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 marsh and dunes. These activities are not located in dunes or submerged areas and will not affect the normal functions of the sand-sharing system at the project area or 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 activities are proposed on beaches, eroding sand dune areas, 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 activities are proposed on beaches, eroding sand dune areas, or submerged lands.

(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 on beaches, sand dunes, or submerged lands.

(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 on beaches, sand dunes, or submerged lands.

(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 are proposed for this project.

GA DNR

JAN 16 2018

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 dunes and coastal marshlands. These activities are not located in dunes or submerged areas and will not affect the normal functions of the sand-sharing system at the project area or other shoreline locations.

(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 applicant's proposed project is located within existing developed areas and will not unreasonably interfere with the conservation of marine life, wildlife, or other resources. Any 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 on private property.

7.0 Warranty Deed

The warranty deed conveying the subject property from Sea Island Company and Sea Island Coastal Properties, LLC to Sea Island Acquisition, LLC, on December 15, 2010, filed and recorded on December 16, 2010 at the office of the Clerk of Superior Court of Glynn County, Georgia, is included as Attachment B.

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.

GA DNR

JAN 16 2018

11.0 Hurricane Certification

The project will comply with the most current applicable hurricane standards. A certification letter from Mr. Johnathan Roberts, P.E., dated January 15, 2018 is included in Attachment E.

12.0 Permit Drawings

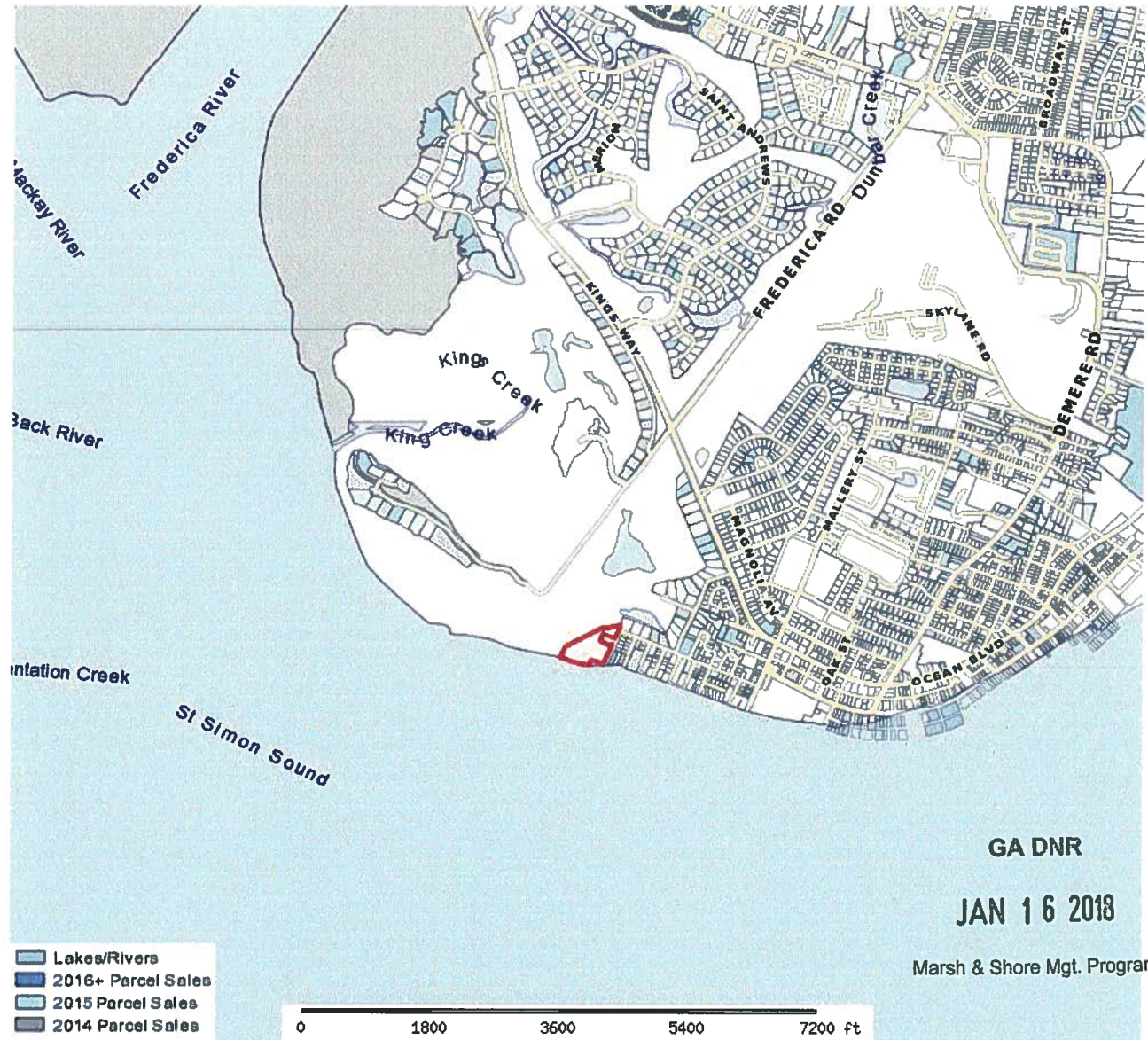
The activities proposed within SPA jurisdiction are depicted on the proposed site plan titled *SPA Exhibit, Lodge Cottages, Saint Simons Island, GA*, dated December 13, 2017 (Attachment G)

13.0 Application Fee

A check for the application fee of \$250.00 has been submitted upon delivery of the application.

GA DNR

JAN 16 2018



Torras			
Parcel: 04-04864 Acres: 5.8			
Name:	TORRAS ROBERT MI	Land Value:	\$2,205,600.00
Site:	101 GOULD ST ST SIMONS ISLAND 31522	Building Value:	\$344,400.00
Sale:	\$0 on 03-2007 Reason= Qual=	Misc Value:	\$0.00
Mail:	101 GOULD ST ST SIMONS ISLAND, GA 31522	Total Value:	\$2,550,000.00



The Glynn County Assessor's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. All data is subject to change before the next certified taxroll. PLEASE NOTE THAT THE PROPERTY APPRAISER MAPS ARE FOR ASSESSMENT PURPOSES ONLY NEITHER GLYNN COUNTY NOR ITS EMPLOYEES ASSUME RESPONSIBILITY FOR ERRORS OR OMISSIONS —THIS IS NOT A SURVEY—
Date printed: 01/12/18 : 15:34:49



*A Golden Past.
A Shining Future.*

COMMUNITY DEVELOPMENT DEPARTMENT
1725 Reynolds Street, Suite 200, Brunswick, GA 31520
Phone: 912-554-7428/Fax: 1-888-252-3726

January 29, 2018

Mr. Karl Burgess
GA Department of Natural Resources, Coastal Resources Division
One Conservation Way, Suite 300
Brunswick, GA 31520

Re: 115 Retreat Avenue, St. Simons Island

Dear Mr. Burgess:

This letter is to acknowledge that the golf course use and associated work are allowed uses in the Forest Agricultural (FA) and PDG zoning at 115 Retreat Avenue.

Please feel free to contact me if you have any questions.

Sincerely,

Stefanie Leif, AICP
Planning Manager

Attachments: Signed and dated site plan of proposed work

GA DNR

JAN 30 2018

Marsh & Shore Mgt. Program



January 16, 2018

Glynn County Community Development
Planning and Zoning Division
Attn: Ms. Denise Keller
700 Gloucester Street, Suite 202
Brunswick, Georgia 31520

RE: Sea Island Acquisition, LLC / Lodge Cottages
Parcel No.: 04-04808

Dear Ms. Keller:

Resource & Land Consultants, on behalf of Sea Island Acquisition, LLC c/o Mr. William McHugh, has submitted an application to the Georgia Department of Natural Resources, Coastal Resources Division (CRD) requesting authorization under The Shore Protection Act (SPA) (O.C.G.A. §12-5-230) to conduct activities within SPA jurisdiction at 115 Retreat Avenue, on St. Simons Island, Glynn County, Georgia.

The applicant is seeking authorization to perform the following activities in SPA jurisdiction:

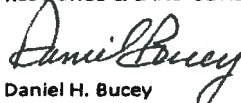
- Removal of existing concrete cart path
- Re-grading and re-grassing of existing tee boxes
- Installation of storm drainage pipe

Attached is a drawing produced by Roberts Civil Engineering titled **SPA Exhibit, Lodge Cottages, St. Simons Island Georgia**, dated December 13, 2017 that depicts the proposed activities on the subject property. In accordance with O.C.G.A. § 12-5-238(11), the applicant must submit a letter from the local zoning authority in which the property is located stating that the proposed activities does not conflict with applicable zoning regulations. In addition, it is the CRD's policy to request that you also initial and date the attached plan so that they can insure that the final permitted facility is consistent with your initial review.

The applicant understands that your preliminary approval of the proposed concept plan does not constitute approval of the project itself or any associated facilities. The applicant further understands that all necessary permits and approvals for activities associated with the development of the subject property will be secured prior to construction.

At your earliest convenience, please provide a letter stating that the applicant's proposal is not in violation of Glynn County zoning regulations associated with the project location. We appreciate your timely response to this request. If you should have any questions or require additional information, please contact me at your earliest convenience.

Sincerely,
RESOURCE & LAND CONSULTANTS


Daniel H. Bucey
Principal

GA DNR

JAN 30 2018

Marsh & Shore Mgt. Program

Enclosures

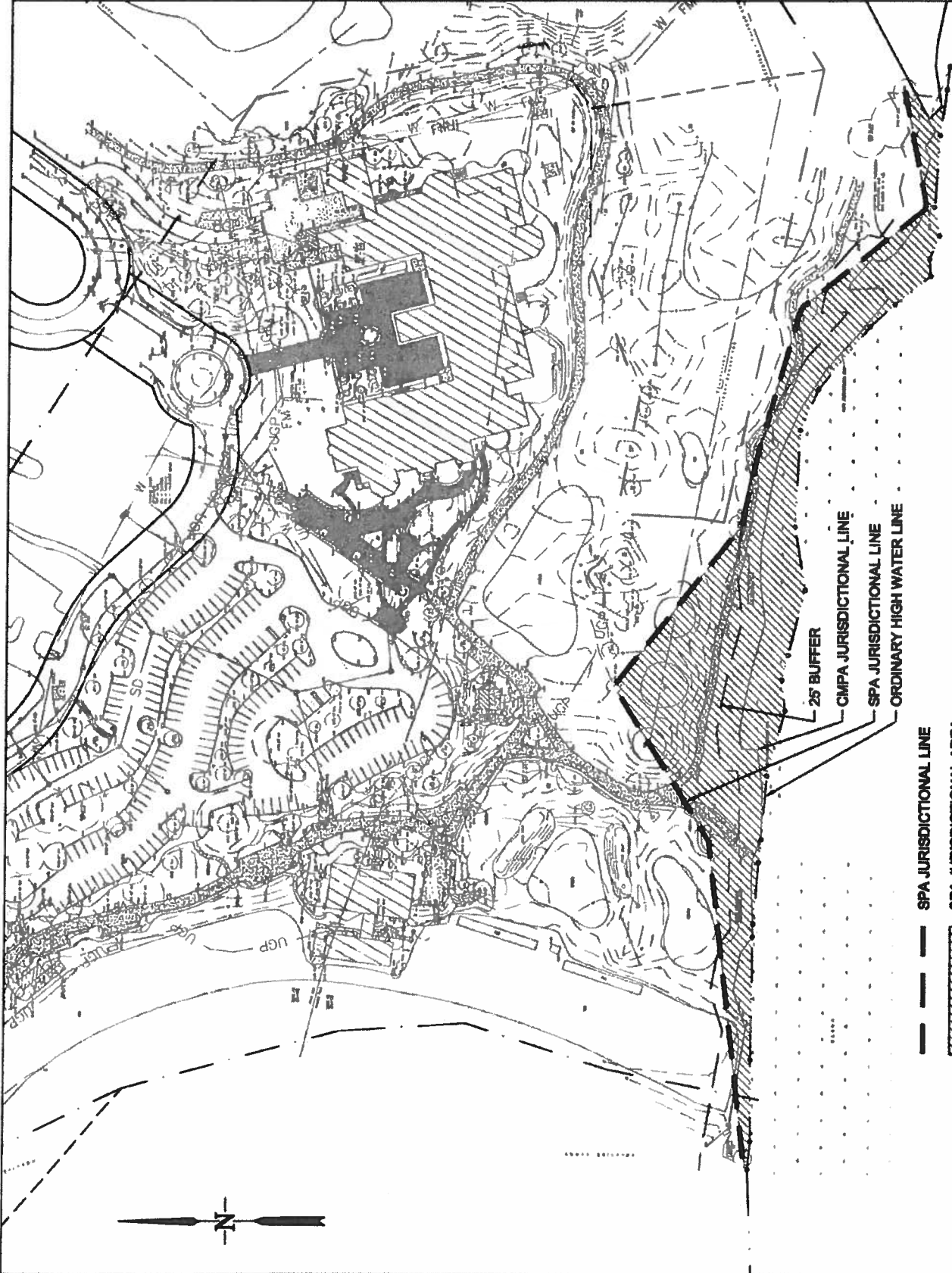
cc: Mr. William Edenfield: SIA

DATE: 2017-12-13
DRAWN BY: CDM
CHECKED BY: JDR
PROJECT NO.: 17069
SCALE: 1" = 150'

SPA EXHIBIT
LODGE COTTAGES, GA
SAINT SIMONS ISLAND, GA

PREPARED FOR:
SEA ISLAND
ACQUISITION, LLC

ROBERTS CIVIL ENGINEERING
301 SEA ISLAND ROAD, SUITE 10
ST. SIMONS, GA 31522
912-638-9881 OFFICE
912-289-0339 FAX



- SPA JURISDICTIONAL LINE
- SPA JURISDICTIONAL AREA (1.88 ACRES)
- GA DNR
- 25' BUFFER
- CMPA JURISDICTIONAL LINE
- SPA JURISDICTIONAL LINE
- ORDINARY HIGH WATER LINE

JAN 30 2018

Marsh & Shore Mgt. Program

Handwritten signature: Alexander 4/29/18



SPA JURISDICTIONAL AREA (1.83 AC)
 SPA ENCROACHMENT AREA
 (0.48 ACRES = 26% OF SPA AREA)
 SPA ENCROACHMENT AREA
 CART PATH REMOVAL = 0.11 AC
 SPA ENCROACHMENT AREA
 GRADING = 0.36 AC
 SPA ENCROACHMENT AREA
 STORM DRAINAGE = 0.01 AC

PROPOSED CONTOUR LINE
 EXISTING CONTOUR LINE



GA DNR

JAN 30 2018

Marsh & Shore Mgt. Program

S. J. Anderson 1/29/18

ROBERTS
CANN
 ENGINEERING

2/2

DATE: 2017-12-13
 DRAWN BY: CBM
 CHECKED BY: JDR
 PROJECT NO.: 17069
 SCALE: 1" = 80'

SPA EXHIBIT
 LODGE COTTAGES, GA
 SAINT SIMONS ISLAND, GA

PREPARED FOR:
 SEA ISLAND
 ACQUISITION, LLC

ROBERTS CIVIL ENGINEERING
 301 SEA ISLAND ROAD, SUITE 10
 ST. SIMONS, GA 31522
 912-638-9681 OFFICE
 912-289-0399 FAX



301 Sea Island Road Suite 10, St. Simons, GA 31522
912-638-9681 Office 912-289-0339 Fax

January 15, 2018

Karl Burgess
Coastal Resources Division
Department of Natural Resources
One Conservation Way
Brunswick, GA 31523

Mr. Burgess:

This letter serves to relate my understanding that the improvements within the Shore Protection Act Jurisdictional Area at the Lodge Cottages do not violate any hurricane standards.

Sincerely,

Johnathan Roberts, P.E.
Professional Engineer

GA DNR

JAN 16 2018

Marsh & Shore Mgt. Program



COASTAL RESOURCES DIVISION
ONE CONSERVATION WAY • BRUNSWICK, GA 31520 • 912.264.7218
COASTALGADNR.ORG

MARK WILLIAMS
COMMISSIONER

DOUG HAYMANS
DIRECTOR

December 8, 2017

Robert N. Shupe
Shupe Surveying Company, P.C.
3837 Darien Highway
Brunswick, GA 31252

**Re: Coastal Marshland Protection Act (CMPA) and Shore Protection Act (SPA),
Jurisdiction Line Verifications, The Lodge at Sea Island Golf Course, St. Simons
Sound, St. Simons Island, Glynn County, Georgia**

Dear Mr. Shupe:

Our office has received the survey and plat, revised November 22, 2017, prepared by Shupe Surveying Company, P.C. No. 2224 entitled "*CMPA & SPA Jurisdiction Exhibit of: The Lodge at Sea Island Golf Course (G.M.D. 25, St. Simons Island, Glynn County, Georgia)*" for Sea Island Acquisition, LLC. Based on my site inspection, on September 5, 2017, this survey and plat generally depicts the delineation of the marsh/upland boundary, as required by the State of Georgia for jurisdiction under the authority of the Coastal Marshlands Protection Act O.C.G.A. § 12-5-280 et seq.

Additionally, this survey and plat by Shupe Surveying Company, P.C. No. 2224, revised November 22, 2017, entitled "*CMPA & SPA Jurisdiction Exhibit of: The Lodge at Sea Island Golf Course (G.M.D. 25, St. Simons Island, Glynn County, Georgia)*" generally depicts the Ordinary High Water Mark and the delineation of the State's jurisdiction area, as required by the State of Georgia for jurisdiction under the authority of the Shore Protection Act O.C.G.A. § 12-5-230 et seq. based on my site inspection, September 5, 2017.

The Coastal Marshlands Protection Act O.C.G.A. § 12-5-280 et seq. and the Shore Protection Act O.C.G.A. § 12-5-230 et seq. delineations of the parcel are subject to change due to environmental conditions and legislative enactments. These jurisdiction lines are valid for one year from date of the verification. They will normally expire one year from the date of my inspection which occurred September 5, 2017, but may be voided should legal and/or environmental conditions change.

This letter does not relieve you of the responsibility of obtaining other state, local or federal permission or authorization relative to the site. Authorization by the Coastal Marshlands Protection Committee/Shore Protection Committee or this Department is required prior to any construction or alteration in the marsh or shore jurisdictional areas.

GA DNR

JAN 16 2018

Marsh & Shore Mgt. Program

Jurisdiction Verifications
The Lodge at Sea Island Golf Course
Page 2 of 2

We appreciate you providing us with this information for our records. Please contact me at (912) 262-3109 if I may be of further assistance.

Sincerely,



Jordan Dodson
Coastal Permit Coordinator
Marsh and Shore Management Program

Enclosure: Survey of CMPA & SPA Jurisdiction Exhibit of: The Lodge at Sea Island Golf Course (G.M.D. 25th, St. Simons Island, Glynn County, Georgia)
File: JDS20170225

GA DNR

JAN 16 2018

Marsh & Shore Mgt. Program

