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May 6, 2026

Ms. Deb Barreiro  
*Delivered via email*

**Re: Response to Public Comments**

6 Lovell Avenue—0.28 Acres  
Tybee Island, GA 31328  
PIN # 40003-18006  
ES&T Project: 25-0301

Ms. Barreiro,

Thank you for forwarding the comments received during the public notice period. On behalf of the property owners, we are committed to implementing necessary measures to ensure that their new home does not adversely affect neighboring properties and to comply with all federal, state, and local requirements. Below is a summary of adjacent property owners' concerns, followed by our response.

**Property Owners' Concerns**

**William Randolph (8 Lovell – adjacent home)**

- Mr. Randolph expressed concern about runoff between the homes and suggested installing a brick wall along the property line.
- He noted that raising the property to 10.3 feet could increase flooding, especially during hurricanes.

**Jeffrey Lee (7 Lovell - across the street)**

- Mr. Lee stated that the gravel pad installed during construction is causing flooding on the street.
- He raised concerns that raising the property could flood both his property and the at-grade cottage.

**Terri Ackland (9 Lovell - directly across the street)**

- Ms. Ackland reported that the construction rock entrance is causing flooding on the street and on her property, and she included photos as evidence.
- She is concerned that raising the property by three additional feet will make it higher than the street level.
- She believes that the home's increased footprint will cause more flooding.

## **Response to Comments**

The project site is within FEMA Flood Zones AE (Base Flood Elevation of 10 feet) and VE (BFE of 12 feet). Construction of the new home must comply with FEMA regulations and the City of Tybee Technical Standards and Specifications. Specifically, the home must be elevated so that the lowest supporting horizontal structural member (excluding pilings or columns) is at least two feet above the BFE. Since the existing grade is 8.0 feet, the finished floor must be at least 10 feet above grade to meet these requirements. Adjacent at-grade cottages may be exempt from these elevation requirements.

In addition to the 25-foot Department of Natural Resources buffer along the sand dunes, the City of Tybee Island requires a 10-foot building setback. These constraints determine the new home's current location. The original cottage-style home had a horizontal footprint of 1,243 square feet. In 2022, approval was granted for an expanded footprint of 1,635 square feet. The current home footprint is 1,572 square feet, approximately 330 square feet larger than the original cottage.


Previous plans included a swimming pool, but this amenity was removed to maximize green space, preserve native vegetation, and reduce site disturbance. The present site plan retains over 65% of the property as green space, preserving its natural topographic and vegetative character.

The existing ground elevation at 6 Lovell Avenue is approximately 8 feet MSL, higher than the street and nearby properties, which are approximately 7 feet MSL. This suggests that the original at-grade cottage discharged excess stormwater to Lovell Avenue. The current stormwater management plan uses gutters and swales to direct water toward Lovell Avenue. There, runoff is collected by existing inlets and pipes along Lovell Avenue and Highway 80. The site plan includes a pervious driveway that allows stormwater to infiltrate the soil and a landscaped earthen berm between the new home and 8 Lovell Avenue to retain rainfall on-site. The property owners are amenable to adding additional stormwater drainage methods, such as directing rooftop runoff to sandy soils in green spaces and installing bioretention gardens, rain barrels, and cisterns to harvest and store excess water on-site.

Beyond this project, additional developments are progressing on Lovell Avenue. Most of the adjacent properties have larger building footprints and less green space, which may exacerbate local drainage problems. To effectively resolve these issues, the City of Tybee might need to upgrade and expand the municipal stormwater system to improve drainage along the street for all residents.

The Georgia DNR permit must be approved before the applicant can proceed with the local review process. The revised site plans, including the stormwater management plan, will be reviewed before the City of Tybee issues a new building permit. During the review process, any outstanding issues or concerns can be addressed and resolved.

Sincerely,



Tara R. Merrill  
Owner/Environmental Consultant