



COASTAL RESOURCES DIVISION  
ONE CONSERVATION WAY · BRUNSWICK, GA 31520 · 912-264-7218

WALTER RABON  
COMMISSIONER

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DIRECTOR

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**SHORE PROTECTION ACT  
STAFF'S FINDINGS & RECOMMENDATIONS**

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March 7, 2025

**TO:** Shore Protection Committee:  
Commissioner Walter Rabon, Chairman  
Mr. Chad Barrow  
Mr. Brad Brookshire  
Mr. Davis Poole  
Dr. Valerie Hepburn

**FROM:** Department Staff to the Committee

**APPLICANT:** Glynn County Board of Commissioners  
1725 Reynolds Street  
Brunswick, GA 31520

**AGENT:** Rob Brown  
Goodwyn Mills Cawood LLC  
1612 Newcastle Street, #218  
Brunswick, GA 31520

**LOCATION:** 4101 First Street, St. Simons Island, Atlantic Ocean, Glynn County,  
Georgia.

**PROPOSED PROJECT:** The applicant proposes the removal and installation of native landscaping, filling of a wetland, establishing a new beach driving access point, maintenance of an existing crosswalk, and installation of sand fencing and a portion of a sand volleyball court within the State's Shore Protection Act (SPA) Jurisdiction.

**APPLICABLE LAW:** Official Code of Georgia Annotated (O.C.G.A.) § 12-5-230 *et seq.*  
Shore Protection Act.

**SUMMARY OF PUBLIC COMMENTS:** The Public Notice of the Shore Protection Committee ran from February 1, 2025 through March 2, 2025. Two comments were received with questions regarding the project, one comment was received in support of the project, and 34 comments were received in opposition to the project. The agent has provided written responses to the comments. Negative comments include concerns about St. Simons Land Trust property; damage to sand dunes, maritime forest, and wetlands; the Georgia Outdoor Stewardship Act

funding; harm to wildlife and habitat loss; harm to property values; and future beach erosion concerns.

**FINDINGS:** Department Staff to the Committee make the following findings regarding this application:

**Project Scope and Justification: O.C.G.A. § 12-5-238:**

1. The subject property plus the First Street right of way (ROW), both owned by Glynn County and known as Coast Guard Park, is approximately 333,910sq.ft. (7.67 acres), of which 14,113sq.ft. (0.324 acres) is within SPA jurisdiction.
2. The St. Simons Land Trust (SSLT) parcel totals 62,291sq.ft. (1.43 acres), of which approximately 1,176sq.ft. (0.027 acres) is within SPA jurisdiction.
3. SSLT has provided written permission to Glynn County for “the continued use of the existing beach access path extending from Glynn County Old Coast Guard Station Beach Access Parking across a portion of the Land Trust’s Hamby Tract as it has been used to access St. Simons beach for a number of years,” and “approve of the of the proposed shift in the existing path to turn north and return to Glynn County property further west than its current location, removing the path from Coast Cottage Property.” SSLT does recommend pruning existing foliage and offering an alternative recreational activity such as birding instead of clearing the area of existing trees and shrub scrub.
4. The area within jurisdiction consists of an existing boardwalk and beach access on the northern end of the property, existing footpath with plastic mesh matting on the southern end of the property, with maritime forest and a freshwater wetland area between the beach accesses.
5. SPA Permit #457 was issued in March 2018 and authorized maintenance of the existing public crossovers on St. Simons Island, including the existing boardwalk at the north end of Coast Guard Park designated as public beach access #27. The existing 15.6ft. x 146.7ft. (2,288sq.ft.) wooden boardwalk begins on the upland and leads seaward, 278.5sq.ft. of which is within the SPA jurisdictional area. The boardwalk terminates at mesh mats (6.5ft. x 345ft.) which currently extends beyond the Ordinary High-Water Mark (OHWM).
6. The applicant proposes demolition of the western, or landward, portion of the beach access and replacement with a concrete sidewalk connecting to the existing boardwalk, resulting in an additional 127sq.ft. of permanent impacts within the SPA jurisdictional area. The applicant will also remove any portion of the mesh mats extending beyond the OHWM. Upon completion, the northern beach access will terminate perpendicular to the shoreline, seaward of the existing dunes and landward of the OHWM.
7. The existing southern beach access consists of 6ft. x 200ft. of plastic mesh mats lining a footpath leading seaward from the upland to provide access across the sand dunes. The current alignment of the path leads from Glynn County property and crosses into the property of SSLT and St. Simons Coast Cottages Neighborhood Association Inc.
8. The applicant proposes to realign the existing path away from the Coast Cottages property and designate it as an additional beach driving access point for emergency vehicles and county staff.
9. To minimize disturbance to the sand sharing system, the majority of the existing path will be modified and maintained within the existing footprint. The existing matting will be removed and replaced with 10ft. x 445ft. mesh mat leading seaward from the upland and terminating perpendicular to the shoreline, seaward of the existing dunes and landward of the OHWM.

10. Temporary impacts within the dynamic dune field associated with the realignment will be 7,535sq.ft. and permanent impacts associated with the realignment of the southern beach access will be 4,450sq.ft.
11. Additionally, the applicant proposes the installation of a 0.0361 acre portion of sand volleyball court which will require grading and the addition of 200 cubic yards of fill to produce a level playing surface. All fill for the volleyball court will be beach quality sand and have a finished elevation of 9ft. The court will include permanent poles for the net to be mounted to and installed with post hole diggers and minimal concrete work to secure the poles.
12. The installation of 160 linear feet (0.0034 acres) of sand fencing is proposed to prevent wind damage to the landscaping and volleyball court.
13. As proposed permanent impacts in SPA jurisdiction total 0.055 acres, including a 0.0091 acre portion of northern beach access, a 0.0064 acre portion of southern beach access, 0.0034 acres of sand fencing, and a 0.0361 acre portion of sand volleyball court.
14. The applicant also proposes temporary impacts within SPA jurisdiction over a total area of 0.118 acres landward of the sand dunes to include the clearing of vegetation and replacement with native coastal vegetation and fill of a 0.024 acre portion of wetland. The freshwater wetland will require 95 cubic yards of fill to be finished at an elevation of 7.5ft. The area will be planted with native coastal vegetation. A 0.178 acre natural area within SPA jurisdiction will remain unchanged. A final landscape plan depicting native coastal vegetation will be submitted for approval prior to conducting the work.
15. All work within jurisdiction will be accomplished with typical earth-moving equipment including excavators and skid-steer, as well as hand labor.
16. Existing and proposed impacts within jurisdiction will total 0.055 acres (15.7%), and approximately 0.296 acres (84.3%) of the state's SPA jurisdictional area will remain in a natural or improved topographic and vegetative condition.

**Application Form, Applicant Name and Address, Project Site Plan, Plat, Deed or other instrument, Written permission to carry out project by owner of land, O.C.G.A. § 12-5-238 (1-5.8):**

17. Applicant has submitted the application form, name and address, project site plan, plats, and deed.

**Adjoining Landowners, Non-refundable application fee, O.C.G.A. § 12-5-238 (6.7):**

18. Applicant has submitted the names and addresses of adjoining property owners as well as the non-refundable application fee required.

**Hurricane Resistant Standards, O.C.G.A. § 12-5-238(9):**

19. No new structures are being proposed within jurisdiction.

**Local Government Zoning, O.C.G.A. § 12-5-238(11):**

20. Applicant has provided a statement from the Glynn County Community Development Department that the project does not violate any zoning law.

**Landfill, Hazardous Waste Inquiry, O.C.G.A. § 12-5-239(12):**

21. Applicant has made an inquiry to the appropriate authorities that the proposed project is not over a landfill or hazardous waste site and that the site is otherwise suitable for the proposed project.

**Notification of Proposed Project, O.C.G.A. § 12-5-239(b):**

22. Adjacent property owners and interested parties who have requested to be placed on the mailing list were notified in writing of the proposed project. The Public Notice of the Shore Protection Committee ran from February 1, 2025 through March 2, 2025. Two comments were received with questions regarding the project, one comment was received in support of the project, and 34 comments were received in opposition to the project. The agent has provided written responses to the comments. Negative comments include concerns about St. Simons Land Trust property; damage to sand dunes, maritime forest, and wetlands; the Georgia Outdoor Stewardship Act funding; harm to wildlife and habitat loss; harm to property values; and future beach erosion concerns.

**Requirement and Restriction Regarding the Issuance of a Permit, O.C.G.A. § 12-5-239(c):**

23. 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 project includes the installation of a 0.0361 acre portion of sand volleyball court which will require grading and the addition of 200 cubic yards of fill to produce a level playing surface. All fill for the volleyball court will be beach quality sand and have a finished elevation of 9ft. The installation of 160 linear feet of sand fencing is proposed to prevent wind damage to the landscaping and volleyball court. The applicant also proposes the designation of the southern access as a beach driving access and temporary impacts within SPA jurisdiction over a total area of 0.118 acres to include the clearing of vegetation and replacement with native dune vegetation and fill of a 0.024 acre portion of freshwater wetland. The freshwater wetland will require 95 cubic yards of fill to be finished at an elevation of 7.5 ft. A 0.178 acre natural area within SPA jurisdiction will remain unchanged. The area will be planted with native coastal vegetation. The majority of the proposed project will be landward of the existing sand dunes. Impacts associated with the realignment of the southern beach access will be temporary and the area will be maintained in a natural or improved topographic and vegetative condition.
- 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;** As proposed, 84.3% (0.296 acres sq.ft.) of the SPA jurisdictional area will remain in a natural or improved topographic and vegetative condition.

- C. The proposed project is designed according to applicable hurricane resistant standards;** No new structures are being proposed within jurisdiction.
- 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;** The project includes the installation of a 0.0361 acre portion of sand volleyball court which will require grading and the addition of 200 cubic yards of fill to produce a level playing surface. All fill for the volleyball court will be beach quality sand and have a finished elevation of 9ft. The installation of 160 linear feet of sand fencing is proposed to prevent wind damage to the landscaping and volleyball court. The applicant also proposes the designation of the southern access as a beach driving access and temporary impacts within SPA jurisdiction over a total area of 0.118 acres to include the clearing of vegetation and replacement with native dune vegetation and fill of a 0.024 acre portion of freshwater wetland. The freshwater wetland will require 95 cubic yards of fill to be finished at an elevation of 7.5 ft. A 0.178 acre natural area within SPA jurisdiction will remain unchanged. The area will be planted with native coastal vegetation. Approximately 84.3% of the SPA jurisdictional area will be maintained in a natural or improved topographic and vegetative condition. Impacts associated with and incidental to 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 majority of the proposed project will be landward of the existing sand dunes. Impacts associated with the realignment of the southern beach access will be temporary and the area maintained in a natural or improved topographic and vegetative condition.

24. No permit shall be issued except in accordance with the following provisions:

- (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 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;** A 127sq.ft. portion of concrete sidewalk will be added to the landward side of the existing northern beach access, the boardwalk will remain unchanged, and any mesh mats extending beyond the OHWM will be removed. A portion of the southern beach access will be realigned off Coast Cottages property and designated as an additional beach driving access point for emergency vehicles and county staff. The majority of the existing path will be modified and maintained within the existing footprint. The existing matting

will be removed and replaced with 10ft. x 445ft. of mesh mats leading seaward from the upland and terminating perpendicular to the shoreline, seaward of the existing dunes and landward of the OHWM. Temporary impacts associated with the abandonment and realignment of a portion of the existing path include planting the affected area with native coastal vegetation. Temporary impacts within the dynamic dune field associated with the realignment will be 7,535sq.ft. and permanent impacts associated with the realignment of the southern beach access will be 4,450sq.ft. Upon project completion, the natural topography and vegetation shall be restored to at least its former condition. The project is not expected to result in unreasonably harmful, increased alteration of the dynamic dune field or function of the sand-sharing system.

- 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;** A 127sq.ft. portion of concrete sidewalk will be added to the landward side of the existing northern beach access, the boardwalk will remain unchanged, and any mesh mats extending beyond the OHWM will be removed. A portion of the southern beach access will be realigned off Coast Cottages property and designated as an additional beach driving access point for emergency vehicles and county staff. The majority of the existing path will be modified and maintained within the existing footprint. The existing matting will be removed and replaced with 10ft. x 445ft. of mesh mats leading seaward from the upland and terminating perpendicular to the shoreline, seaward of the existing dunes and landward of the OHWM. Temporary impacts associated with the abandonment and realignment of a portion of the existing path will be planted with native coastal vegetation. Temporary impacts within the dynamic dune field associated with the realignment will be 7,535sq.ft. and permanent impacts associated with the realignment of the southern beach access will be 4,450sq.ft. Upon project completion, the natural topography and vegetation shall be restored to at least its former condition. The project is not expected to result in unreasonably harmful, increased alteration of the dynamic dune field or function of the sand-sharing system.

**Public Interest Considerations, O.C.G.A. § 12-5-239(j):**

**25. In passing upon application for a permit, the Committee shall consider the public interest:**

- A. The project will not result in unreasonably harmful, increased alteration of the dynamic dune field or submerged lands, or function of the sand-sharing system;** The majority of the proposed project will be landward of the existing sand dunes. Impacts associated with the realignment of the southern beach access will be temporary and the area maintained in a natural or improved topographic and vegetative condition.
- B. The project will not unreasonably interfere with the conservation of marine life, wildlife, or other resources;** The proposed project will be landward of the

existing sand dunes. Impacts associated with the realignment of the southern beach access will be temporary and the area maintained in a natural or improved topographic and vegetative condition. The proposed project is located within the vicinity of designated sensitive sea turtle nesting areas. All lighting will be installed and operated in accordance with DNR Wildlife Resources Division's Sea turtle nesting guidelines as well as Glynn County's lighting regulations. Any work conducted within SPA jurisdiction during sea turtle nesting season will be performed in coordination with DNR staff to determine if the activities could potentially impact nesting sea turtles. Maritime forests and wetlands are known habitat for many bird species. Clearing and fill activities and replacement with early successional vegetation may alter species usage of that area.

- C. The project will not unreasonably interfere with reasonable access by and recreational use and enjoyment of public properties;** The proposed project will be conducted on public property but is meant to improve public access and recreational use of the beach and the park. Interference to public access and recreation will be temporary and occur during construction of the proposed project.

**RECOMMENDATIONS:** Should the Committee determine the proposed project to be in the public interest, Department Staff to the Committee recommends the following standard and special conditions:

**SHORE PROTECTION ACT O.C.G.A. § 12-5-230**  
**STANDARD PERMIT CONDITIONS**

1. The project must comply, as applicable, for areas permitted herein, with all other Federal, State, and local statutes, ordinances, and regulations, and the applicant must obtain all licenses and permits prior to commencement of construction.
2. This permit does not resolve actual or potential disputes regarding ownership of or rights in or over the property upon which the subject project is proposed and shall not be construed as recognizing or denying any such rights or interests.
3. All plans, documents, and materials contained in this permit application, required by the Shore Protection Act O.C.G.A. 12-5-230 *et. seq.* are a part of this permit and conformance to such plans, documents, and materials are a condition of this permit. No change or deviation from these plans, documents, and materials shall be permitted without prior notification and approval by the Department or Committee.
4. No further encroachment or construction shall take place within State jurisdiction, except as permitted by the Shore Protection Committee. Any modification of the plans or structure in the jurisdictional area must be reviewed and approved by the Department prior to construction.
5. A construction placard will be required to be obtained from the Department up to 30 days prior to the start of project construction and must be posted at the site. This placard will include certain steps in the construction of the permitted project that must be approved by the Department prior to construction.
6. The exact location and configuration of this project must be reviewed onsite and approved by Department staff immediately prior to beginning construction. Minor changes to the location

may be allowed or required in areas that have eroded or accreted subsequent to the original jurisdictional determination.

7. No construction materials may be disposed of in the jurisdictional area of the Shore Protection Act.
8. Any incidental impacts associated with the construction of this project must be rectified by restoring areas to their pre-construction topographic and vegetative states.
9. The public shall maintain rights of ingress and egress on the foreshore beach area seaward of the ordinary high water mark.
10. If the permitted improvements are damaged, fall into disrepair, become dilapidated, are not meeting their expected usefulness, or are not maintained at a serviceable level, then it is the responsibility of the owner to remove the improvements. A new permit will be required to retain and repair the structure, improvement or asset if it loses its structural integrity and is no longer serviceable.
11. The Shore Protection Committee is not bound in the future to protect any asset or improvements authorized by the permit.
12. The permit must be posted onsite within twenty-four (24) hours of beginning construction.
13. A copy of the above conditions must be supplied to the person in charge of construction.

### **SPECIAL CONDITIONS**

1. In order to minimize the disruption of nesting activity from artificial lighting from the subject parcel, the Permittee must comply with the Department of Natural Resources' Wildlife Resources Division's Sea turtle nesting guidelines as well as the lighting ordinance of Glynn County.
2. Because the project may occur between May 1<sup>st</sup> and October 31<sup>st</sup>, sea turtle nesting season, an individual with a DNR Sea Turtle Cooperators Permit must survey the area prior to the work beginning. All sea turtle nests must be avoided, and no activity may occur within 20ft. of a nest area. If a sea turtle nest is within the projected realignment of the southern beach access, construction will be required to delay until outside of sea turtle nesting season, or a new pathway location must be approved by DNR staff.
3. A final landscape plan depicting native coastal vegetation must be provided to the Department for approval prior to installation.
4. If the location or length of the southern beach access changes, an updated design plan must be submitted to the Department 30 days prior to construction.
5. The permittee must coordinate with and submit written notification to the Department staff for approval a minimum of 10-days prior to trimming and vegetation removal activities.
6. Maintenance trimming is only valid for the life of this permit.
7. No root structures in the sand dunes will be trimmed or damaged during the realignment of the southern beach access. All trimmings will be removed to an upland disposal site outside of jurisdiction.
8. Only beach quality sand suitable for sea turtle nesting, successful incubation and hatchling emergence shall be used on the project site. Fill material must be comparable in both coloration and grain size. All fill material shall be free of construction debris, rocks, or other foreign matter and shall not contain on average, greater than 10% fines (i.e. silt and clay; passing through a #200 sieve) and shall not contain on average, greater than 5% coarse gravel or cobbles (retained by a #4 sieve).



9. Permittee may be required to provide a post-construction survey that locates the proposed realignment of the southern beach access and volleyball court as indicated in the application materials. Such survey shall comply with the Georgia Plat Act, O.C.G.A. § 15-6-67 et seq.