



July 8, 2020

Mr. Sam LaBarba
Coastal Permit Coordinator
Georgia Department of Natural Resources, CRD
Brunswick, GA 31520

**RE: Kinzey / 319 W 47th Street Bulkhead Response to Public Comments
Sea Island, Glynn County, Georgia**

Dear Mr. LaBarba:

I refer to two (2) public comments forwarded from your office regarding the proposed shoreline protection bulkhead located at 319 W 47th Street, on Sea Island, Glynn County, Georgia.

The public comments were received in response to the public notice that was issued on June 5, 2020 and expired on July 5, 2020, for activities proposed in tidal waters subject to Coastal Marshlands Protection Act (CMPA) jurisdiction. The comments are summarized below from each commenter, followed by the applicant's response.

Mr. Julian Smith (via email transmittal dated 7/1/2020)

Comment 1: *"First: I object to the statement in the fourth paragraph of the CRD Public Notice that 'The proposed project does not contain an upland component.' The proposed project, which involves the construction of a bulkhead and the 'filling of 723 square feet of coastal marshlands with 40 cubic yards of fill to create a residential lawn', is obviously designed to 'contain' or retain that residential lawn. How or why is the creation of a residential lawn a reason for permitting a bulkhead and the filling of wetlands?"*

Applicant's Response: As stated in the revised public notice, the correct calculated impacts are 723 ft² and 17.9 cubic yards of fill below the high tide line (slightly more than a single average dump truck load), and the correct project purpose is to provide shoreline protection. Reference to the project purpose being for creation of a residential lawn was inferred by CRD staff due to an architectural label on the site plan, which simply described the entire non-hardscape area surrounding the proposed house as lawn, and did not specifically define the bulkhead backfill area as residential lawn creation. The shoreline averages approximately 8" from bottom of marsh to the exposed shoreline and CMPA jurisdiction limits (see attached representative photos). The amount of fill proposed is well below what is typically allowed for bank stabilization project, which can be up to 500' in length and allow for 1 cubic yard of fill per running foot, for a total of 500 cubic yards.

"Upland component" is defined at Rule 391-2-3-.02(2)(q):

"Upland component of the project" is all those service areas, amenities, and recreational areas located inland of the Coastal Marshlands Protection Act jurisdiction line, that serve or augment the functioning of the marshlands component of the project, such as, but not limited to, dry stack

boat storage; dockmaster shop; fuel storage and delivery facilities to serve the marshlands component of the project; and restrooms intended for users of the marshlands component of the project. This term may extend to and cover such facilities adjacent to or in proximity to the marshlands component of the project that are intended to serve exclusively or primarily the users of the marshlands component of the project if the Committee finds in its sole discretion that such facility is likely to alter the marshlands”.

For shoreline stabilization, the overall project purpose is to protect the shoreline by constructing the bulkhead seaward of the eroding shoreline, and carefully backfilling landward of the bulkhead. The marshlands component, being the bulkhead, is not intended as a means to access or utilize the marshland, but only to protect the upland from shoreline erosion. Therefore, there are no service areas, amenities, or recreational areas located landward of the bulkhead that service or augment the functions of the marshlands component, being the bulkhead/shoreline stabilization structure.

Comment 2: *“Second: While I agree that “the proposed project is under 1/10th of an acre”, I object to the continuing failure of CRD to consider the cumulative effect of upscale residential development on marshes and wetlands. In the case of this property, there is already a new elevated walkway approximately 850 feet long and six feet wide leading across the marsh to what the Public Notice refers to as “an authorized private single-family dock” in Village Creek. The Public Notice makes absolutely no reference to that walkway or to the impact of its construction in the tidal marsh or to the future impact on the marsh of repairs to and maintenance of that walkway. Why not?”*

Applicant’s response: Private single-family docks are exempt from CMPA jurisdiction as found at O.C.G.A. § 12-5-295(7):

§ 12-5-295. Applicability of part

This part shall not apply to the following:

(7) The building of a private dock exclusively for the noncommercial use of the owner or his or her invitees and constructed on pilings, the walkways of which are above the marsh grass not obstructing tidal flow, by:

(A) The owner of a lot on which a detached single-family residence is located on high land adjoining such dock; or

(B) The owner of a lot having at least 50 front feet of land abutting the marshlands which contains high land suitable for the construction of a detached single-family residence and where the construction of such a residence is not prohibited.

The lot owner shall and is authorized to maintain the structure in good condition and repair the same as necessary, and the use of repair or replacement materials comparable in quality to the original authorized materials shall be sufficient for such purposes;

The dock was authorized by the U.S. Army Corps of Engineers under Section 10 of the Rivers and Harbors Act of 1899. The impacts associated with the shoreline stabilization is limited to the bulkhead and backfill of only 723 ft² (17.9 cubic yards below the high tide line).

Comment 3: *“Third: I object to the last sentence in the second paragraph of the Public Notice, which asserts “There is currently no bank stabilization in place and erosion has created a non-linear interface between upland and marsh.” That statement seems to imply that the lack of “bank stabilization” is somehow improper and that a “non-linear interface between upland and marsh” must be corrected with a linear interface. Is that a reflection or indication of DNR or CRD standards and policies?”*

Applicant’s response: A landowner’s right to protect his upland property from erosion has long been recognized under State and Federal law. As stated on the CRD website, *“Due to the dynamic nature of our area, erosion of upland can occur anywhere along tidal river and creek banks. Protecting the upland bank may be necessary to preserve the integrity and stability of your property”* (<https://coastalgadnr.org/AuthorizationAndPermitsCRD>). The “non-linear interface between upland and marsh” is natural and site-specific in areas that do not have existing shoreline stabilization. Site-specific variations in vegetation, soil type, and elevation all contribute to varying levels of erosion. As such each site and project should be evaluated on a case-by-case basis. As proposed, the bulkhead is not designed to create a “linear interface” between the upland and the marsh. The proposed bulkhead generally follows the CMPA jurisdiction limits, with the exception of two (2) small areas created by uprooting of trees during hurricane Matthew. In those areas, the applicant has proposed to follow the shoreline as it may have existed prior to the tree loss, which will in turn provide added protection to remaining trees along the shoreline. As stated previously, site-specific conditions are present on the applicant’s lot, specifically the presence of a non-tidal wetland that appears to be a remnant drainage feature (ditch). This non-tidal wetland intersects the CMPA jurisdiction line approximately in the center of the lot at the location where the applicant is proposing to extend the bulkhead more seaward than the remainder of the structure. Both the non-tidal and tidal impacts associated with this project have been authorized by the U.S. Army Corps of Engineers (SAS-2019-00570).

Comment 4: *“Fourth: Although I cannot state “Whether or not the granting of a permit and the completion of the applicant[']s proposal will unreasonably interfere with the conservation of fish, shrimp, oysters, crabs, clams or other marine life,” I suggest that the Coastal Marshlands Protection Committee ask the applicant whether or not he intends to unreasonably interfere with marine life when he and his family, friends, and guests go out and about on the boats now or in the future on or moored at his dock.”*

Applicant’s response: The CMPC does not regulate operation of watercraft. The applicant’s dock was built in accordance with applicable state and federal law, and must be operated in accordance with those authorizations, including provisions and special conditions that consider and protect marine life.

Comment 5: *“Fifth: While I again thank the applicant for allowing me to visit the site and for providing a pass that allowed me access to Sea Island, a private enclave, I would like to know why DNR and/or CRD do not routinely provide the opportunity for public site walks at which the applicants and/or their agents can answer questions.”*

Applicant’s response: While the applicant was willing to provide access to his property by appointment to allow interested parties to inspect what is a routine and minimal impact, the applicant cannot answer or speculate on the policies of the DNR/CRD regarding site inspections of private properties.

Ms. Jane Fraser (via email of 7/2/2020)

Comment 1: *‘The CRD Public Notice states, “The proposed project, which involves the construction of a bulkhead and the “filling of 723 square feet of coastal marshlands with 40 cubic yards of fill to create a*

residential lawn.” This is clearly in conflict with the Coastal Marshlands Protection Act, enacted as it says to protect the marsh.’

Applicant’s response: As stated in the revised public notice, the correct calculated impacts are 723 ft² and 17.9 cubic yards of fill below the high tide line (slightly more than a single average dump truck load), and the correct project purpose is to provide shoreline protection. Reference to the project purpose being for creation of a residential lawn was inferred by CRD staff due to an architectural label on the site plan, which simply described the entire non-hardscape area surrounding the proposed house as lawn, and did not specifically define the bulkhead backfill area as residential lawn creation. The shoreline averages approximately 8” from bottom of marsh to the exposed shoreline and CMPA jurisdiction limits (see attached representative photos). The amount of fill proposed is well below what is typically allowed for bank stabilization project, which can be up to 500’ in length and allow for 1 cubic yard of fill per running foot, for a total of 500 cubic yards.

While the CMPA was enacted to protect coastal marshlands, its intent was not to prohibit all alterations within jurisdiction, but to regulate such activities to insure minimal impacts to coastal marshlands. O.C.G.A. § 12-5-281 states:

“The General Assembly further finds and declares that activities and structures in the coastal marshlands must be regulated to ensure that the values and functions of the coastal marshlands are not impaired and to fulfill the responsibilities of each generation as public trustees of the coastal marshlands for succeeding generations.”

A landowner’s right to protect his upland property from erosion has long been recognized under State and Federal law. As stated on the CRD website, *“Due to the dynamic nature of our area, erosion of upland can occur anywhere along tidal river and creek banks. Protecting the upland bank may be necessary to preserve the integrity and stability of your property”* (<https://coastalgadnr.org/AuthorizationAndPermitsCRD>).

Further, as stated previously, filling of CMPA jurisdictional areas is routine for shoreline protection, and at allowable quantities much larger than what has been proposed by the applicant. O.C.G.A. § 12-5-288(b)(1) states that filling of marshland for residential, commercial, and industrial uses *“are normally considered to be contrary to the public interest when located in coastal marshlands, but the final decision as to whether any activity or structure is considered to be in the public interest shall be in the sound discretion of the committee...”*. The quantities proposed for this project are minimal in size, well below allowable thresholds, and routinely authorized for projects that meet the impact thresholds.

Comment 2: *“Building a bulkhead in the marsh, which is thriving at this location, (see photo marked MarshDock) is obviously designed to retain fill, not to protect the marsh. The creation of a residential lawn is NOT a valid reason for permitting a bulkhead and the filling of salt marsh. O.C.G.A. 12-5-280.”*

Applicant’s response: The shoreline at the tidal water / upland interface is not thriving and is experiencing significant erosion of the shoreline, exposing roots along the majority of the shoreline (see attached photographs). Without some type of protection, all of the vegetation along the lot will eventually succumb to the effects of erosion and sea level rise. A bulkhead is by design located below the marsh/upland interface, and various amounts of backfill are utilized to fill the narrow void between the bulkhead and exposed shoreline. Depending upon the landscape plan and existing vegetation, the filled area may remain natural, or landscaped with lawn or planted with native or non-native plants. The

purpose of this bulkhead is not to create a residential lawn, but to protect the obviously impaired shoreline, and the secondary effect is the backfilled area becomes part of the landscaped yard, which occurs with all authorized bulkheads.

Comment 3: *"If the applicant is truly concerned about bank stabilization and erosion, he should do everything he can to save the cedars that are still in place. I have a similar situation on the marsh some blocks south of Mr. Kinzey, and the cedars, knocked over by the hurricane three years ago, are still thriving. They are preventing erosion on my property far better than any artificial bulkhead could do."*

Applicant's response: While some of the uprooted trees may still be alive, the likelihood of their long-term survival is low. Sea level rise will further exacerbate their chance at survival. A bulkhead at this location would provide a permanent solution to arresting erosion and prolonging the survival of remaining trees and protecting the upland from sea level rise.

Comment 4: *"Yes, the "interface between upland and marsh" is non-linear. (again, please see photos) In other words, Mother Nature does not always draw a straight line along the banks of rivers or coast along the shore."*

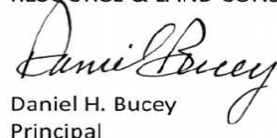
Applicant's response: See response to Smith, comment 3, page 2.

Comment 5: *"The application does not address the tidal pool on the property. The drawing makes it look as though the bulkhead cuts off all salt water into the tidal pool. We hope the applicant can confirm that the tidal pool will not be filled or affected."*

Applicant's response: The limits of CMPA jurisdiction have been properly delineated and verified by CRD staff. All areas of CMPA jurisdiction have been clearly indicated on the drawing and impacts calculated at 723 ft² and 17.9 cubic yards. The bulkhead would not result in tidal areas being located on the landward side of the structure.

We trust that this information answers the questions related to the public comments received for this project. Should you have any questions or require additional information, please contact me at your earliest convenience.

Sincerely,
RESOURCE & LAND CONSULTANTS



Daniel H. Bucey
Principal

enclosures



Photo 1: Typical shoreline erosion

RLC Project No.:	17-217
Figure No.:	1
Prepared By:	DB
Photo Date:	11/5/2019
Exhibit Date:	7/7/2020

Kinzey W 47th Street Bulkhead
Glynn County, Georgia

Site Photographs
Prepared For: Brad Knzey



**RESOURCE+LAND
CONSULTANTS**

41 Park of Commerce Way, Ste 101
Savannah, GA 31405
tel 912.443.5896 fax 912.443.5898



Photo 2: Typical shoreline erosion along fill area

RLC Project No.:	17-217
Figure No.:	2
Prepared By:	DB
Photo Date:	12/10/2019
Exhibit Date:	7/7/2020

Kinzey W 47th Street Bulkhead

Glynn County, Georgia

Site Photographs

Prepared For: Brad Kinzey



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Savannah, GA 31405
tel 912.443.5896 fax 912.443.5898



Photo 3: Typical shoreline erosion

RLC Project No.:	17-217
Figure No.:	3
Prepared By:	DB
Photo Date:	12/10/2019
Exhibit Date:	7/7/2020

Kinzey W 47th Street Bulkhead
Glynn County, Georgia

Site Photographs
Prepared For: Brad Kinzey



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Savannah, GA 31405
tel 912.443.5896 fax 912.443.5898



Photo 4: Typical depth along shoreline

RLC Project No.:	17-217
Figure No.:	4
Prepared By:	DB
Photo Date:	4/14/20
Exhibit Date:	7/7/2020

Kinzey W 47th Street Bulkhead

Glynn County, Georgia

Site Photographs

Prepared For: Brad Kinzey



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CONSULTANTS**

41 Park of Commerce Way, Ste. 101
Savannah, Georgia 31405
912.443.5596 www.rlc.com

From: [Rutlin, William M CIV USARMY CESAS \(USA\)](#)
To: [Labarba, Sam](#); [CRDDL](#); [Cynthia Cooksey - NOAA Federal](#); [Dodd, Mark](#); [Foisy, Bruce](#); [George, Clay](#); [Keyes, Tim](#); [Lee, Jason](#); [Leonard, Eamonn](#); [Smith, Bradley](#); [Thompson, Jacob](#); [Wikoff, Bill](#); [Barreiro, Deb](#)
Cc: [Wise, Sarah E CIV USARMY CESAS \(USA\)](#)
Subject: RE: Revised Interagency Notice: 319 W 47th Street, LLC CMPA PN
Date: Monday, June 15, 2020 3:47:51 PM

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Sam,

USACE comment would be that the applicant should also contact the Corps, if they have not already, to determine what permit requirements may be needed out of our office.

William M. Rutlin
Chief, Coastal Branch
Regulatory Division
US Army Corps of Engineers, Savannah District

100 West Oglethorpe Avenue
Savannah, Georgia 31401-3640
912-652-5893 (desk)
912-652-5995 (fax)

Thank you in advance for completing our Customer Survey Form. This can be accomplished by visiting our web site at http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey, and completing the survey on-line. We value your comments and appreciate your taking the time to complete a survey each time you interact with our office.

From: Labarba, Sam <sam.labarba@dnr.ga.gov>
Sent: Friday, June 5, 2020 8:03 AM
To: CRDDL <CRDDL@dnr.state.ga.us>; Cynthia Cooksey - NOAA Federal <cynthia.cooksey@noaa.gov>; Dodd, Mark <Mark.Dodd@dnr.ga.gov>; Foisy, Bruce <Bruce.Foisy@dnr.ga.gov>; George, Clay <Clay.George@dnr.ga.gov>; Keyes, Tim <Tim.Keyes@dnr.ga.gov>; Lee, Jason <Jason.Lee@dnr.ga.gov>; Leonard, Eamonn <Eamonn.Leonard@dnr.ga.gov>; Rutlin, William M CIV USARMY CESAS (USA) <William.M.Rutlin@usace.army.mil>; Smith, Bradley <Bradley.Smith@dnr.ga.gov>; Thompson, Jacob <Jacob.Thompson@dnr.ga.gov>; Wikoff, Bill <bill_wikoff@fws.gov>; Barreiro, Deb <Deb.Barreiro@dnr.ga.gov>
Subject: [Non-DoD Source] Revised Interagency Notice: 319 W 47th Street, LLC CMPA PN

PUBLIC NOTICE

June 5, 2020

319 W 47th Street, LLC

Fill of Coastal Marshlands and Construction of a Bulkhead

Village Creek, Sea Island, Glynn County, Georgia

This serves as notification from the Coastal Marshlands Protection Committee and the Georgia Department of Natural Resources of a request from 319 W 47th Street, LLC for a Coastal Marshlands Protection Act (CMPA) permit under Official Code of Georgia (O.C.G.A.) 12-5-280 et seq., to fill coastal marshlands and construct a bulkhead at 319 W 47th Street, Village Creek, Sea Island, Glynn County, Georgia. The proposed project is under 1/10 of an acre, and therefore may be considered a minor alteration of coastal marshlands under O.C.G.A. 12-5-280 et. seq.

It is the responsibility of the applicant to demonstrate that the project is not contrary to the public interest and that no feasible alternative sites exist. Impacts to coastal marshlands must be minimal in size. In passing upon the application for permit, the Coastal Marshlands Protection Committee shall consider the public interest: (1) Whether or not unreasonably harmful obstruction to or alteration of the natural flow of navigational water within the affected area will arise as a result of the proposal; (2) Whether or not unreasonably harmful or increased erosion, shoaling of channels, or stagnant areas of water will be created; and (3) Whether or not the granting of a permit and the completion of the applicants proposal will unreasonably interfere with the conservation of fish, shrimp, oysters, crabs, clams, or other marine life, wildlife, or other resources, including but not limited to water and oxygen supply.

A detailed public notice with drawings has been distributed and is available by visiting the Department of Natural Resources website: CoastalGaDNR.org under "Marsh & Shore Permits"

Please provide this office with substantive, site-specific comments as to why the proposed work should or should not proceed. Comments and questions concerning this proposed project should be submitted in writing and be submitted by the close of business on July 5, 2020 to Sam LaBarba, Department of Natural Resources, One Conservation Way, Brunswick, Georgia 31520.

Sincerely,

Sam LaBarba

Coastal Permit Coordinator

Coastal Resources Division

(912) 262-3127 | M: (912) 266-0277

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GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: [Jane Fraser](#)
To: [LaBarba, Sam](#)
Cc: [Noble, Josh](#)
Subject: comments regarding CMPA permit for fill and bulkhead at 319 W 47th Street on Sea Island
Date: Thursday, July 2, 2020 4:46:16 PM

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Dear Mr. LaBarba and Mr. Noble,

I would like to thank the applicant's agent, Daniel Bucey, as well as the applicant, Mr. Kinzey, for the informative visit to the site at 317 West 47th Street on Sea Island.

On the basis of my site visit, I have the following comments:

The CRD Public Notice states, "The proposed project, which involves the construction of a bulkhead and the "filling of 723 square feet of coastal marshlands with 40 cubic yards of fill to create a residential lawn." This is clearly in conflict with the Coastal Marshlands Protection Act, enacted as it says to protect the marsh.

Building a bulkhead in the marsh, which is thriving at this location, is obviously designed to retain fill, not to protect the marsh. The creation of a residential lawn is NOT a valid reason for permitting a bulkhead and the filling of salt marsh. O.C.G.A. 12-5-280.

If the applicant is truly concerned about bank stabilization and erosion, he should do everything he can to save the cedars that are still in place. I have a similar situation on the marsh some blocks south of Mr. Kinzey, and the cedars, knocked over by the hurricane three years ago, are still thriving. They are preventing erosion on my property far better than any artificial bulkhead could do.

Yes, the "interface between upland and marsh" is non-linear. In other words, Mother Nature does not always draw a straight line along the banks of rivers or coast along the shore.

The application does not address the tidal pool on the property. The drawing makes it look as though the bulkhead cuts off all salt water into

the tidal pool. We hope the applicant can confirm that the tidal pool will not be filled or affected

Quite simply, natural shorelines are not protected by bulkheads and fill but by vegetation that will thrive and hold the land, such as the cedars now in place.

I would like to request that the Coastal Marshlands Protection Committee hold a public hearing on this permit application. Other neighbors would also like to attend the hearing.

Sincerely,

Jane Fraser
227 West 16th Street
Sea Island, GA 31561

From: [J. R. Smith](#)
To: [Labarba, Sam](#)
Cc: [Noble, Josh](#)
Subject: comments and questions regarding CMPA permit for fill and bulkhead at 319 W 47th Street on Sea Island
Date: Wednesday, July 1, 2020 8:01:53 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. LaBarba:

Let me start by thanking the applicant, Bradford Kinzey, for allowing me to visit the site, and for having Daniel Bucey, his agent or representative, meet me at the site. During that meeting, Mr. Bucey assured me that Mr. and Mrs. Kinzey intend to live in the house they propose to build on this site, which they have owned for three years.

On the basis of my June 11th site visit, I have the following comments and questions:

First: I object to the statement in the fourth paragraph of the CRD Public Notice that “The proposed project does not contain an upland component.” The proposed project, which involves the construction of a bulkhead and the “filling of 723 square feet of coastal marshlands with 40 cubic yards of fill to create a residential lawn”, is obviously designed to “contain” or retain that residential lawn. How or why is the creation of a residential lawn a reason for permitting a bulkhead and the filling of wetlands?

Second: While I agree that “the proposed project is under 1/10th of an acre”, I object to the continuing failure of CRD to consider the cumulative effect of upscale residential development on marshes and wetlands. In the case of this property, there is already a new elevated walkway approximately 850 feet long and six feet wide leading across the marsh to what the Public Notice refers to as “an authorized private single-family dock” in Village Creek. The Public Notice makes absolutely no reference to that walkway or to the impact of its construction in the tidal marsh or to the future impact on the marsh of repairs to and maintenance of that walkway. Why not?

Please consider that the walkway to the dock and the dock itself may have an impact or effect in excess of one tenth of an acre and that the cumulative impact or effect of the walkway, the dock, the bulkhead, and the fill are clearly greater than one-tenth of an acre. Yes, that is not how CRD or DNR regulations calculate whether or not an application is “minor” and thus does not require a public hearing—which leads to the question: why not?

Third: I object to the last sentence in the second paragraph of the Public Notice, which asserts “There is currently no bank stabilization in place and erosion has created a non-linear interface between upland and marsh.” That statement seems to imply that the lack of “bank stabilization” is somehow improper and that a “non-linear interface between upland and marsh” must be corrected with a linear interface. Is that a reflection or indication of DNR or CRD standards and policies?

Please forgive me for assuming the verbiage I just quoted above is simply a bureaucratic paraphrase of the following claims in Mr. Bucey’s June 3rd email to you: “the project purpose is for shoreline protection”; “Nowhere in the application or other materials has the purpose been stated that it is for anything but shoreline stabilization”; and (to repeat the first claim) “The project purpose is for shoreline protection”. How are natural shorelines protected by bulkheads and fill? When will CRD and DNR admit they are helping to protect private property, not the natural environment?

Fourth: Although I cannot state “Whether or not the granting of a permit and the completion of the applicant[’s] proposal will unreasonably interfere with the conservation of fish, shrimp, oysters, crabs, clams or other marine life,” I suggest that the Coastal Marshlands Protection Committee ask the applicant whether or not he intends to unreasonably interfere with marine life when he and his family, friends, and guests go out and about on the boats now or in the future on or moored at his dock.

Fifth: While I again thank the applicant for allowing me to visit the site and for providing a pass that allowed me access to Sea Island, a private enclave, I would like to know why DNR and/or CRD do not routinely provide the opportunity for public site walks at which the applicants and/or their agents can answer questions.

Finally, I respectfully request that the Coastal Marshlands Protection Committee schedule and hold a public hearing on this permit application.

Sincerely,

Julian Smith
61 Maxwell Avenue
Saint Simons Island, GA 31522