

Patrick, Diana

From: Mark [REDACTED] >
Sent: Wednesday, June 24, 2026 9:19 AM
To: Comments, CRD
Subject: Proposed private dock regulations

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.

Does this change clarify privately-owned riverbottoms from those that are not private? Will DNR also place signage when appropriate to protect private-owned docks from boaters exceeding idle speed within the restricted areas? Post entire non-navigable streams as idle speed?

If you are going to regulate where docks can go, protect the property of the owners by posting g appropriate signage for idle speed only when necessary to preserve property.

Thanks
Mark Newman
[REDACTED]

Patrick, Diana

From: Chet Reynolds [REDACTED]
Sent: Wednesday, June 24, 2026 9:28 PM
To: Comments, CRD

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The answer is in the question itself - "over state waters" !!! These are public waters meaning they are for all of the public not just a privilege few so obviously no this should not be allowed !! So many of our waterways are riddled with private docks so seriously do we need more of these ?? How about coming to the table with proposals for more public docks so the rest of us tax paying citizens can have a place to fish from since we can't fish from many banks around our many lakes and rivers in Georgia where all the banks are now private property with zero easement for somebody just simply wanting to fish from the bank, pretty disgusting if you ask me, it's no wonder so many kids are getting themselves in troubles nowadays, I'm 68 years old and grew a passion for fishing as a young boy and I truly believe is the main reason I've stayed out of trouble cuz I was trying to go fishing every chance I got and back in the day it wasn't such a hard thing to do like it is now because of so much lack of bank access to allow a person to actually go fishing in our many lakes in rivers !!!!!

Patrick, Diana

From: John Williamson [REDACTED]m>
Sent: Thursday, June 25, 2026 10:31 AM
To: Comments, CRD
Subject: Briefing on proposed amendment of Subject 391-2-1 of the Rules of the Department of Natural Resources to establish rules for private docks in state owned tidal waters

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.

To Coastal Resources Division/ Department of Natural Resources

I am writing to express my opposition to the proposed amendments to Subject 391-2-1 regarding private docks in state-owned tidal waters. While the stated goal of creating a permanent regulatory framework sounds reasonable on paper, the practical, real-world impact of these rules will place an undue burden on coastal property owners, compromise private property rights, and unnecessarily expand government spending.

As a resident of the coastal region, I urge the Board to reject or heavily revise this proposal based on several critical flaws:

1. Arbitrary Enforcement via Vague "As Determined by the Department" Wording

The Department states that this rule change is meant to give property owners and marine contractors "clear and consistent expectations." However, the draft text repeatedly relies on highly subjective catch-all wording—specifically the phrase "as determined by the department." Leaving critical boundaries, compliance thresholds, and spatial justifications to subjective department evaluation completely defeats the purpose of codifying code. It creates zero legal predictability, invites inconsistent rule application from one inspector to the next, and leaves coastal homeowners at the mercy of arbitrary bureaucratic opinions rather than clear, measurable legal standards.

2. Hidden, Out-of-Pocket Compliance Costs

While the Department emphasizes that there are "no new agency fees" to submit an application, this completely glosses over the massive spike in compliance costs for the property owner. Forcing standard residential docks to adhere to rigid, codified dimensional limits on irregular shorelines will inevitably push normal projects into the "administrative variance" category. Navigating a formal state variance process is notoriously slow and complex, often forcing homeowners to hire costly third-party surveyors, environmental consultants, and attorneys just to get a simple recreational dock approved.

3. "No-Notice" Inspections and Private Property Encroachment

The enforcement mechanisms detailed in the proposal raise serious red flags regarding private property rights. Granting state agents the authority to conduct ongoing compliance inspections on residential docks means bureaucrats will be accessing private walkways, gated paths, and shorelines without explicit, case-by-case notice to the homeowner. This is a blatant overreach that compromises privacy and violates the basic expectation of security on private residential property.

4. Wasteful Expansion of Public Spending

Patrick, Diana

From: Patricia Varnadore <[REDACTED]>
Sent: Thursday, June 25, 2026 7:16 PM
To: Comments, CRD
Subject: Dock Permits

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I believe rules should be clear to developers only and not to individuals. Developers only come here to build junky houses and leave. They are tantamount to carpet baggers. They have no long term interest in this community. Home owners and businesses are invested in this community. We should encourage the continuation of that goodwill. Our county so far exhibits rules do not apply to developers but are unbending to the tax paying citizens. We should take a hard look at our leaders motives when they do these things. We the people of Georgia own the property. Our resources are not for sale. DNR needs to manage it as so.

Sent from my iPhone

Patrick, Diana

From: Sharon Kitchen <[REDACTED]>
Sent: Sunday, June 28, 2026 4:45 PM
To: Comments, CRD

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New dock rules

Seems d.n.r. does whatever it wants whenever it wants to..refer to Sapelo Island dock and the Sapelo Seven.

on Darien dock...no repairs..almost fallen down but owner is wealthy...so he gets away with whatever...even telling the Shrimp boat captins to pay extra 500...or leave..so they left...i see some are back now ..if you aren't wealthy no one listens.

I used to visit Sapelo...not after the warnings ignored, and then 7 died ..nope.

Patrick, Diana

From: Christina Strickland <civinput@newmode.io>
Sent: Thursday, July 9, 2026 6:08 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Christina Strickland



Patrick, Diana

From: John and Nancy Crosby <civicinput@newmode.io>
Sent: Thursday, July 9, 2026 6:09 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.
- To introduce such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape. It is up to us to protect the precious marshes that we have in Georgia. Allowing longer and wider docks will only destroy more habitat.

Thank you for considering our comments.

John and Nancy Crosby



Patrick, Diana

From: Sharen Martin <civicinput@newmode.io>
Sent: Thursday, July 9, 2026 6:43 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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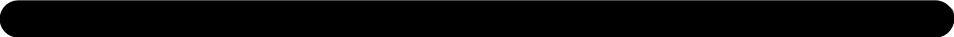
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Thank you for considering my comments,
Sharen Martin



Patrick, Diana

From: Lara Sims <civiciinput@newmode.io>
Sent: Thursday, July 9, 2026 7:26 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Lara Sims

S.

Patrick, Diana

From: Norman Jacobs <civicinput@newmode.io>
Sent: Thursday, July 9, 2026 7:48 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Norman Jacobs



Patrick, Diana

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Thank you for considering my comments,
Norman Jacobs



Patrick, Diana

From: Diane Parkman <civicinput@newmode.io>
Sent: Thursday, July 9, 2026 7:55 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Diane Parkman



Patrick, Diana

From: Mara Lockard <civicinput@newmode.io>
Sent: Thursday, July 9, 2026 8:36 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Dear Ms. Jill Andrews,

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While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape. If we don't make these changes to protect our environment, there's no turning back in the future to try to fix it.

Thank you for considering my comments,
Mara Lockard

Patrick, Diana

From: Claude Youmans <civicinput@newmode.io>
Sent: Thursday, July 9, 2026 8:49 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Claude Youmans



Patrick, Diana

From: Vivian Lynch <civicinput@newmode.io>
Sent: Thursday, July 9, 2026 8:53 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Vivian Lynch

Patrick, Diana

From: James Flanders <civicinput@newmode.io>
Sent: Thursday, July 9, 2026 9:52 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
James Flanders

Patrick, Diana

From: Amanda Crangle <civicinput@newmode.io>
Sent: Friday, July 10, 2026 12:01 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Amanda Crangle



Patrick, Diana

From: Robert Meyers <civiciinput@newmode.io>
Sent: Friday, July 10, 2026 3:30 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Robert Meyers

Patrick, Diana

From: Deborah Bessette <civicinput@newmode.io>
Sent: Friday, July 10, 2026 5:51 AM
To: Comments, CRD
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- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Deborah Bessette



Patrick, Diana

From: Donald Privett <civicinput@newmode.io>
Sent: Friday, July 10, 2026 7:29 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

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Thank you for considering my comments,
Donald Privett



Patrick, Diana

From: Jen Hatcher <civiciinput@newmode.io>
Sent: Friday, July 10, 2026 7:29 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Jen Hatcher



Patrick, Diana

From: Sofia Cromer <civicinput@newmode.io>
Sent: Friday, July 10, 2026 7:47 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Sofia Cromer



Patrick, Diana

From: Lori Parker <civicinput@newmode.io>
Sent: Friday, July 10, 2026 8:00 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Lori Parker



Patrick, Diana

From: Lori Parker <civicinput@newmode.io>
Sent: Friday, July 10, 2026 8:02 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Lori Parker



Patrick, Diana

From: Anna Rincon <civiciinput@newmode.io>
Sent: Friday, July 10, 2026 10:37 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Anna Rincon



Patrick, Diana

From: Christine Schaffer <civiciinput@newmode.io>
Sent: Friday, July 10, 2026 10:40 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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.

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Thank you for considering my comments,
Christine Schaffer



Patrick, Diana

From: Elvira & Douglas Rivalsi <civinput@newmode.io>
Sent: Friday, July 10, 2026 1:29 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Dear Ms. Jill Andrews,

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Thank you for considering my comments,
Elvira & Douglas Rivalsi

Patrick, Diana

From: Mary Jo Bragan <civicinput@newmode.io>
Sent: Friday, July 10, 2026 6:43 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Mary Jo Bragan

Patrick, Diana

From: Scott Wagner <civinput@newmode.io>
Sent: Friday, July 10, 2026 8:43 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

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- Incorporate a public process allowing these docs have become obnoxious and I'm tired of seeing dead marsh everywhere. It's just mud I mean come on who are you kidding someone's getting paid off. Let's stop building them
-
-
- altogether. We have enough. adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
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Patrick, Diana

From: Janet Kaylo <civiciinput@newmode.io>
Sent: Saturday, July 11, 2026 4:41 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

While I support CRD's work to codify dock standards for GA's coast, I do not understand why the new ruling allows for docks that will impact the marshes negatively, when such alterations in the current code are completely unnecessary. If the objective is to give access to golf carts! Currently, the majority of golf carts are run on engines, which means more damaging fumes will hang over the marshes and impact the life of the marsh, and secondly it is scientifically established that docks impact the marshes negatively, so allowing them to be wider and longer increases that negative impact. Pre-existing docks that require no maintenance at present also should not be rebuilt to impact the marshes further. Ecological footprints have impacts, and these should remain as they have been for 20 years, and as the dock codes exist in our neighboring coastal areas.

The Coastal Marshland Protection Act has a threshold that should not be exceeded, and the new ruling creates loopholes allow for modifications on functional docks, which, again, is unnecessary and confuses the regulations and the people wanting to expand for their own personal purposes. The wetlands are part of the commons, and their health impacts all of us.

As recommended by coastal conservation groups, codes should be strengthened in the draft rules as follows:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
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Patrick, Diana

From: Miranda O'shields <civicinput@newmode.io>
Sent: Saturday, July 11, 2026 7:37 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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Thank you for considering my comments,
Miranda O'shields



Patrick, Diana

From: E Hodges <civinput@newmode.io>
Sent: Sunday, July 12, 2026 11:36 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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Dear Ms. Jill Andrews,

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Thank you for considering my comments,
E Hodges

Patrick, Diana

From: [REDACTED]
Sent: Monday, July 13, 2026 10:54 AM
To: Comments, CRD
Subject: Public comment on DNR dock rules

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.

I would like to say first off I am against any changes to the current rules as I have not seen issues with them in their current form.

Secondly, I believe there is a major issue with the proposed change noted as 391-2-1-.06 2. This requirement that another revocable license be obtained in order to replace a piling or to do any work with a barge or equipment beyond hand tools (which could be construed to include even a small skiff) even if it is board for board replacement is not only unduly burdensome on property owners but could also be dangerous for the following reasons.

1: Many times a small barge or other equipment is needed to do board for board replacement underneath a dock safely and efficiently. In order to avoid the red tape construction workers or even property owners may place themselves in danger trying to do board for board replacement without the proper equipment.

2: Timely repair of a washed out or damaged piling is essential after a storm to stop more damage from happening and possibly keep an entire dock section from floating away and becoming a hazard. There should be no requirement to get a new license to do a board for board replacement of a piling (which is a board) or to use equipment to replace a small section of dock.

If the DNR still wishes to require a new license for repairs that are not outside the scope of the original license they should at the very least create a time limit upon themselves to approve or reject the license so that property owners are not left in limbo after a storm watching their property be damaged more every day waiting on approval for repair. For example " any application for a revocable license to repair an existing residential dock that has not been denied after a DNR site visit shall be considered approved 10 days after application.

Leo Hebb

Sent from my iPhone

Patrick, Diana

From: Sheila Stephens [REDACTED] >
Sent: Monday, July 13, 2026 4:16 PM
To: Comments, CRD
Subject: Private dock fatality - Letter from parents
Attachments: Jill Andrews - Kale's Law.pdf; Electric Shock Drowning Study.pdf; Stephens Inspection Summary.pdf; Stephens Lab Exam Summary.pdf

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 Jill Andrews,

I am writing to you today to express my deep concern regarding the current systems in place for private docks in Georgia. Our family's lives were forever changed in June 2023 when we lost our 19-year-old son, Anthony "Kale" Stephens, in a preventable electrical accident on a private dock at Oak Grove Island.

On June 12, 2023, just two weeks after graduating from high school, our 19-year-old son, Kale, began what should have been an exciting new chapter of his life. He had taken a summer job doing construction work on a private dock at Oak Grove Island. At the end of the workday, a board fell into the water. Kale jumped in to retrieve it. The current carried him to the neighboring dock, where he climbed out of the water and began walking down the dock. As he reached the end of the dock, he was electrocuted by faulty electrical wiring.

In a matter of moments, our family's future changed forever.

No parent should ever have to bury their child because of a preventable accident. There is not a day that goes by that we do not feel the overwhelming loss of Kale. Every birthday, holiday, and family gathering reminds us that someone we loved beyond words is missing. We have now lived with this heartbreak every single day for the last three years, and we pray no other family is ever forced to carry this kind of pain.

Our family attended the recent town hall meeting at the local DNR headquarters in Brunswick because we were hopeful that sharing Kale's story might help bring about meaningful change. We weren't there to assign blame. We were there to advocate for safer regulations so that another family never has to experience what we have endured.

Unfortunately, much of the discussion centered around dock dimensions, protecting marine life during construction, and boat hoists. While those issues certainly matter, we were deeply discouraged that the electrical safety of private docks—the very issue that claimed our son's life—appeared to have no clear oversight.

When we asked whether the electrical components of private docks are inspected, we were told it is essentially a "gray area" where no one seems to know who is responsible. That answer was heartbreaking.

Someone has to take responsibility before another life is lost.

Following Kale's death, electrical engineers from Atlanta conducted a detailed investigation of the dock. Their findings documented numerous electrical code violations, including the lack of proper grounding throughout the electrical system. The conditions were so dangerous that the electrical service to the home had to be shut off immediately. I have attached portions of those engineering reports in hopes that they may assist you in understanding the seriousness of the hazards that were discovered.

We later learned that a small child lived at that home. We cannot help but think how easily this tragedy could have involved another innocent child. It could have been anyone—a child swimming, someone fishing, or another young person simply enjoying a day on the water.

We believe that when property owners apply for permits to build or modify private docks, they should be required to disclose whether electrical service will be installed. More importantly, docks with electrical systems should be subject to periodic safety inspections.

Living on the Georgia coast means these structures endure hurricanes, tropical storms, extreme tides, flooding, humidity, and constant exposure to corrosive saltwater. Even properly installed electrical systems deteriorate over time. Without inspections and maintenance, dangerous conditions can develop that remain hidden until tragedy strikes.

I have also read about other electrical incidents involving docks in Georgia and other states. It is difficult not to wonder how many of those tragedies—or near tragedies—might have been prevented if there had been safeguards and regular inspections in place.

We are not asking for anything unreasonable. We are simply asking for a system that recognizes the unique dangers of combining electricity and water and ensures these structures remain safe for the families who use them.

Kale cannot be brought back. Nothing will ever fill the empty place he left in our lives. But if being Kale's voice can save even one life, then his legacy will continue to protect others. We do not want another mother and father to receive the phone call that forever changes their lives.

Our son mattered. His life mattered. We hope his death becomes the reason meaningful change is made rather than another tragedy that is forgotten.

Thank you for taking the time to read our letter and for considering this matter. We sincerely hope you will help lead the effort to strengthen electrical safety regulations for electrically powered private docks in Georgia. It would mean more than words can express if Kale's life could help prevent another family's unimaginable loss.

One day, we hope these protections will become known as "Kale's Law." While nothing can erase our loss, knowing that Kale's life inspired legislation that saves others would give his legacy a purpose beyond our grief.

Thank you again for your time, your compassion, and your consideration.

Sincerely, Shelia and Tony Stephens

Dear Jill Andrews,

I am writing to you today to express my deep concern regarding the current systems in place for private docks in Georgia. Our family's lives were forever changed in June 2023 when we lost our 19-year-old son, Anthony "Kale" Stephens, in a preventable electrical accident on a private dock at Oak Grove Island.

On June 12, 2023, just two weeks after graduating from high school, our 19-year-old son, Kale, began what should have been an exciting new chapter of his life. He had taken a summer job doing construction work on a private dock at Oak Grove Island. At the end of the workday, a board fell into the water. Kale jumped in to retrieve it. The current carried him to the neighboring dock, where he climbed out of the water and began walking down the dock. As he reached the end of the dock, he was electrocuted by faulty electrical wiring.

In a matter of moments, our family's future changed forever.

No parent should ever have to bury their child because of a preventable accident. There is not a day that goes by that we do not feel the overwhelming loss of Kale. Every birthday, holiday, and family gathering reminds us that someone we loved beyond words is missing. We have now lived with this heartbreak every single day for the last three years, and we pray no other family is ever forced to carry this kind of pain.

Our family attended the recent town hall meeting at the local DNR headquarters in Brunswick because we were hopeful that sharing Kale's story might help bring about meaningful change. We weren't there to assign blame. We were there to advocate for safer regulations so that another family never has to experience what we have endured.

Unfortunately, much of the discussion centered around dock dimensions, protecting marine life during construction, and boat hoists. While those issues certainly matter, we were deeply discouraged that the electrical safety of private docks—the very issue that claimed our son's life—appeared to have no clear oversight.

When we asked whether the electrical components of private docks are inspected, we were told it is essentially a "gray area" where no one seems to know who is responsible. That answer was heartbreaking.

Someone has to take responsibility before another life is lost.

Following Kale's death, electrical engineers from Atlanta conducted a detailed investigation of the dock. Their findings documented numerous electrical code violations, including the lack of proper grounding throughout the electrical system. The conditions were so dangerous that the electrical service to the home had to be shut off immediately. I have attached portions of those engineering reports in hopes that they may assist you in understanding the seriousness of the hazards that were discovered.

We later learned that a small child lived at that home. We cannot help but think how easily this tragedy could have involved another innocent child. It could have been anyone—a child swimming, someone fishing, or another young person simply enjoying a day on the water.

We believe that when property owners apply for permits to build or modify private docks, they should be required to disclose whether electrical service will be installed. More importantly, docks with electrical systems should be subject to periodic safety inspections.

Living on the Georgia coast means these structures endure hurricanes, tropical storms, extreme tides, flooding, humidity, and constant exposure to corrosive saltwater. Even properly installed electrical systems deteriorate over time. Without inspections and maintenance, dangerous conditions can develop that remain hidden until tragedy strikes.

I have also read about other electrical incidents involving docks in Georgia and other states. It is difficult not to wonder how many of those tragedies—or near tragedies—might have been prevented if there had been safeguards and regular inspections in place.

We are not asking for anything unreasonable. We are simply asking for a system that recognizes the unique dangers of combining electricity and water and ensures these structures remain safe for the families who use them.

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Thank you again for your time, your compassion, and your consideration.

Sincerely, Shelia and Tony Stephens

attachment: references.

~~James D. Shafer~~
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Electric Shock Drowning Incidents – Marinas©

(In-Water electrocution fatalities included)

Rev. 8/15/2025

James D Shafer began the research journey in 2000 to discover how electricity in the water can incapacitate and kill. He was joined by Capt. David Rifkin in 2001, and in 2007, together they embarked on a 2-year research project which took them to marinas across the country. The study was funded by the US Coast Guard and administered by the American Boat and Yacht Council (ABYC).

The study determined the nature and behavior of electrical currents leaking into bodies of water at marinas. Send an email to qualitymarinesvcs@comcast.net to request a copy of the study. This study led to the new ground fault protection levels and installation requirements in Article 555 of the National Electric Code. Based on reports of Electric Shock Drowning-related events, it appears that the rate of losses may be on a downward trend. This is based on the improved access we have with the internet, and protection equipment now required by various codes and standards.

Ground fault leakage into the water causes electrical gradients to form. If a person gets in one of these gradients, a current will flow through the body. Currents as low as 10ma can cause paralysis of limbs preventing a person from staying afloat, resulting in drowning (for comparison a 60 watt light bulb draws 500ma). Higher currents can cause the heart to fail directly resulting in death. There is no warning of this situation, and there is no post-mortem indication available absent any burn marks associated with direct contact with an electrical source. Witness reports (from touching the water or hearing the victim shouting they are getting shocked) often substantiate the presence of electricity on the water.

This is predominantly a low-conductivity-water phenomenon. When water gets saltier or higher in conductivity it competes for the current flow path more favorably than the body, so the current appears to go around the body. In freshwaters the body is more conductive than the water so electrical gradients can establish and act as a voltage source to drive current through the body.

There are likely hundreds or more deaths and injuries associated with electrical leakage into the water. It happens in swimming pools and spas as well. But unlike marina facilities, these are designed for swimming and have more extensive protection equipment installed, along with stricter grounding and bonding requirements. The below list are the known fatalities and “near misses” (where a person in the water gets shocked by survives). We know there many more...

If you encounter a person struggling in the water and suspect it's an electrical condition, don't jump in the water. Rather start securing sources of power nearby, call 911, throw a life ring to the individual, or try to push

Capt. David Rifkin
USN, Ret.

Quality Marine Services, LLC
qualitymarinesvcs@comcast.net

them *away* with a nonconductive pole (this can move them out of the electric field). We have cases where rescuers were also killed trying to help people and pets being shocked in the water. Our research shows that most accidents happen relatively close to potential sources (20 feet or less) but it depends on the source voltage and conductivity of the water among other factors discussed in the US Coast Guard study.

Electric shock drowning can also be caused by submerged irrigation pumps. These pumps require Ground Fault Circuit Interruption (GFCI) protection at their sources. Sadly, many of these are purchased at home stores and installed by homeowners using extension cords. And people are swimming right over them, with a few feet.

The bottom line is DON'T SWIM WITHIN ABOUT 50 YARDS OF ANY KNOWN ELECTRICAL SOURCES. Marinas are required to have an annual inspection of the electrical system to include ALL connections. Conduct of these inspections is few and far between.

If you are contacted about an electric shock drowning incident, take measures to get the evidence secured, and have a quick investigation to determine the cause. My contact information is above, and I welcome any questions you may have, or reports of an ESD to document and learn more about this silent killer.

ELECTRIC SHOCK DROWNINGS

1. July 11, 2025
Porter County Indiana, Marina Shores marina. The investigation revealed an object that belonged to a boat owner fell into the water from the dock and began floating away, according to investigators. Authorities said a 21-year-old voluntarily went into the water to retrieve the object for its owner. As he swam back to dock he appeared to be in distress. His 23-year-old brother jumped in to rescue but was also overcome by electricity in the water. He was pulled to safety. The 21-year-old was later recovered from the water. Authorities said investigators and a licensed electrician determined the likely source of the electricity in the water was from a piece of equipment belonging to a nearby slip holder.
2. June 21, 2025
Blue Ridge Lake, Fannin County GA. A 13-year-old boy was electrocuted when trying to exit the water of a private dock via a metal ladder. Two other boys tried to rescue him but were shocked themselves, along with another woman who was hospitalized from the electric shock. A Fannin County official investigated and found numerous electrical deficiencies, but specifics are not yet known.
3. July 4, 2024
Smith Mountain Lake, Huddleston, VA. An 18yo man jumped into the water at the lake. After recognizing the man was in distress, 2 others jumped in to help. They felt the electrical shock and were able to get out of the water. The 18yo perished from the electric shock drowning. Details pending.
4. Feb 7, 2023
Detroit, MI. Man electrocuted while working in a flooded home basement. He was snaking a drain when flood water poured in and filled the basement. The electrically charged water caused the death. The exact source is unknown. Took 45 min for EMS to get the power off to retrieve the man.
5. Aug 16, 2022
Detroit, MI. Man electrocuted while working in a flooded home basement. He was snaking a drain when flood water poured in and filled the basement. The electrically charged water caused the death. The exact source is unknown. Took 45 min for EMS to get the power off to retrieve the man.
6. July 4, 2021
Louisville, KY. Ohio River, Prospect Yacht Club. A diver was killed while diving on a barge being readied for a local festival. The coroner's report said there was electricity in the water but no specific source was identified.
7. June 4, 2021
Monongahela River Monongahela, PA. A 23 year old man was found unresponsive Beach Club Marina on the Monongahela River. He was swimming near his boat. Reports say that 3 others were shocked in the same area which makes ESD a likely cause.

- June 3, 2021 Mission, TX. A 14-year-old boy was electrocuted when he stepped in a puddle containing a live extension cord. Extension cords are only for temporary use and this one was likely always exposed to elements and had breaks in insulation.
9. Nov 4, 2020 Lake Clyde, Clyde TX. An 18-year-old boy was killed when the sailboat he was swim towing struck a power line. The line broke and fell in the water electrifying the water near the boat. Could have been an electrocution or an electric shock drowning. Power crews secured power to the line before retrieving the boy.
10. Aug 30, 2020 Bradenton Beach, FL. During tropical storm ETA a man was sand bagging the outside of his home. He went into the ground floor storage space where there was 3" of standing water. He was electrocuted in the water. Authorities report the clothes dryer was the source of the current.
11. July 12, 2020 Harris County, TX, hotel pool. A teenager was killed by electricity in a hotel pool that was not permitted to be open. Light fixture wires were exposed and the teen allegedly came in contact with them. The pool failed several inspections prior in an attempt to open.
12. Sep 19, 2019 Peoria AZ, Scorpion Bay Marina, Lake Pleasant. 2 brothers were killed in the water after the first started screaming when he jumped in next to their boat. Two others jumped in and were rescued and treated. Investigators found a modification to the shore power cable system which energized boat's underwater metals. Took 10 min to get the power secured for rescue operations.
13. July 19, 2019 Jefferson County, TX. A 19 year old man was electrocuted while trying to rescue a horse in the flood water aftermath of Tropical Storm Imelda. There was a lightning storm at the time. The source of the electricity was not reported.
14. Apr 2, 2019 Citrus Heights, CA. A 9 year old girl was killed while swimming in a pool at her home. She grabbed a wire attached to one of the underwater pool lights that were under repair, Sacramento Metro Fire said. Four other children in the pool were not injured.
15. Sep 30, 2018 Dixon, CA. Irrigation canal. Two highschool boys were electrocuted while trying to rescue a dog who had fallen into the canal. Three boys and a girl, with the dog, were crossing a narrow bridge over the canal. The dog fell into the canal. The dog's owner and another boy jumped in. They reached up slow their movement and touched the bridge they were crossing and were electrocuted. The other boy jumped in and broke the 2 boys from their grasp and also saved the dog. It is unknown if he got shocked as well. Investigation by authorities in progress. Something energized the bridge, and a lack of ground likely prevented a breaker trip.
16. Sep 1, 2017 Oklahoma City, OK. Bricktown Canal. One man was electrocuted after falling into a canal in the city. He reached up to grab a light post to get out and received a fatal electric shock. Another man jumped in trying to help. He received a strong electric shock and was hospitalized (no status on the rescuer). Electrical fault and lack of grounding was cause.
17. Aug 29, 2017 Houston, TX. 5 men were conducting rescue operation from a boat in the flood waters of Hurricane Harvey. The boat drifted into live powerlines killing 2 of the men. The other 3 were rescued downstream and suffered electrical burns.
18. Aug 11, 2017 Houston, TX. A 25 year old man was trying to reach a house flooded by Hurricane Harvey to rescue the family cat. He stepped on a live electrical wire and fell against the lamp post using that wire. He was killed by the electric shock.

- Jul 12, 2017 Columbia River, Pascoe, WA. A 15 year old was killed while swimming with friends in the Columbia. The teens were gain access to the river at an old pump station which was isolated by a wire fence and barbed wire. One teen grabbed an irrigation pipe and was shocked and fell into the water. He disappeared. Friends got help. Rescuers felt a tingle in the water and one was shocked by the same pipe. An electrical fault at the pump station is the likely cause of the death.
20. Jun 23, 2017 Lovington, NM. A teenager was killed while in the bathtub using a cell phone. The phone was connected to a charger plugged into a damaged, non-GFCI protected extension cord. It is believed she touched the frayed part of the cord and was electrocuted in the tub.
21. Jun 18, 2017 Turkish water park, Akyazi, Turkey. Normally European and Asian continent ESD deaths are not included on the list. This could have happened in the USA. 5 people, including 3 children were killed in a pool at a waterpark. The park manager and his son jumped in to help 3 children. They all died from the electrical exposure. One other was injured.
22. Jun 17, 2017 Toms River Lagoon, NJ. An 11 year old girl was killed when she touched a boat lift that was electrified. She and 2 friends were swimming and on a raft near the lift. The 11 year old reached up to touch the boat lift and was electrocuted. The boat lift had not been used in years. The electrical junction box was corroded from the weather. The girls were wearing life jackets. The other 2 girls were not injured.
23. May 22, 2017 Put-In-Bay, OH, Lake Erie. A 19 year old boy was killed by electricity in the water around the family boat docked at the Miller Marina. The boy's father jumped in to the water to rescue the family dog who had fallen in. The man struggled and went under. His two boys jumped into rescue. Both were shocked. The mother pulled the plug for the boat and the electricity stopped. The 19 year old was unresponsive and died.
24. May 22, 2017 Mandeville, LA. A 23 year old man was electrocuted when he extended an aluminum pole into the water around his sailboat at his dock. He received a fatal electrical shock and died. The cause of the electrocution is unknown. The water may have been electrified, or he might have made direct contact with an electrified metal object.
25. May 19, 2017 Laredo, TX. A young boy and his brother were killed when they stepped into a large puddle of water in a field. A storm had downed trees and powerlines in the area. One of the live powerlines was electrifying the water. The boys frequently played in this field near their home.
26. Apr 14, 2017 Florence, AL. A man and his son were killed in a swimming pool. The man in his pool for cleaning was found submerged by his son who jumped in to rescue. The son was also overcome by electric shock and later died. The wife was also injured by electrical shock trying to help the son. Exact cause is unknown.
27. Mar 29, 2017 Lake Tuscaloosa, AL. Two women went missing after sunbathing on a dock at the lake. Their bodies were found the next morning. At least one investigator felt an electrical shock on the dock during initial emergency response. The accident has been ruled an Electric Shock Drowning. Technical details will be updated when known.
28. Sep 10, 2016 Oakland Lake Park, Ft Worth, TX. Two brothers (11 and 12 years old) were playing in a field after a large storm downed power lines in the area. One boy stepped in a puddle that was electrified by live wires down in the area. He was electrocuted. The brother jumped in to help him and he was also killed. The area was in a very remote low traffic area which delayed investigation of the downed power lines.

- Sep 3, 2016 South Bend, IA. A women was found dead in 6" of water in a flooded basement after heavy rains. A box fan was found submerged nearby. Authorities concluded she was electrocuted in the water. There was nothing mentioned about ground fault protection (GFCIs) being used.
30. Jul 3, 2016 Raleigh, NC. A 17 year old girl was found unresponsive in a community swimming pool. She was the lifeguard on duty and was shocked when reaching into the water to check pool chemistry. Another pool worker received an shock trying to pull her from the water. A faulty pool pump and broken grounding wire are cause. The required GFCI was not installed. The pool was in correct configuration for the 1978 NEC. Some rewiring in 2011 should have required a permit which would have triggered an inspection requiring a GFCI. Community pools in some areas must be inspected annually.
31. May 29, 2016 A Tennessee Lake, TN. A 13year old boy was swimming from a boat. He was noticeably in trouble when 2 adults jumped in to rescue. They were both overcome by electric shock. They were able to save the boy. Exact time and location are unknown. Story reported by WSOCTV.com in Charlotte, NC.
32. Jun 27, 2016 Silver Spring Township, PA. An 8 year old girl was among 8 kids swimming in a backyard pool. When the pool light was turned on 7 other kids were able to get out of the water. The cause was a faulty pool light circuit. Last known in critical condition.
33. May 28, 2016 Phoenix, AZ. 27 year old man in a private pool was trying to repair a broken light fixture. He was shocked and killed while working on the light. The exact cause of the accident is unknown.
34. Apr 16, 2016 Wildwood Crest, NJ. 34 year man was found at the bottom of a motel pool unconscious. The exact cause of the accident is unknown but a pool drain is suspected. Owner said pool was recently inspected and bonded. Last known in critical condition.
35. Mar 27, 2016 Smith Lake, Princeville, AL. Two teenage girls entered the water from a private dock. Both girls were getting shocked in the water. One girl drowned, the other treated and released from hospital. The victim's father and his son jumped into the water to assist. The father blacked out after both were feeling the shocks. The power was turned off at the house, after which the father came to and survived along with son. A missing ground and faulty lighting fixture are suspected to be the cause.
36. Aug 8, 2015 Palm Springs, FL. Six people were shocked in a private swimming pool, one of them a man who jumped in to rescue his daughter. He was overcome by electric shock and pronounced dead at the hospital. The 5 others were treated. The man's daughter, 10 years old died at the hospital. Faulty pool wiring is suspected as the cause. Homes were built in 1963, but not sure of the age of the swimming pool.
37. June 21, 2015 Lake Tuscaloosa, AL. A 37 year old man went swimming from his pontoon boat after cutting grass. He was found on the bottom near the boat in 4 feet of water. Investigators say he was shocked by electricity before he drowned.
38. Aug 24, 2014 Lake of the Ozarks, Woods Hollow Cove, 22.2 mile marker, MO. A 21 year old man and fellow swimmer felt electricity in the water near a dock. The 21 year old grabbed a dock ladder to get out when he was electrocuted and fell back into the water. Someone ran ashore and turned off the power likely saving the other man in the water. A faulty junction box between dock and residence is suspected. The occupants tried to reset the circuit breaker but it would trip after 10-15 seconds of being turned on. The last attempt to turn the breaker on coincided with the 2 swimmers being near the dock as it got dark (breaker controlled dock lights).

- Aug 2, 2014 Lake Bruin, Tensas Parish, LA. Two teenage girls were shocked when trying to exit the water using a ladder on a pontoon boat. The 13yo died, the 17yo was hospitalized. A faulty boat lift is blamed for energizing the ladder of the boat.
40. July 20, 2014 Puyallup River, WA. An 18 year old girl died while tubing with a friend down the Puyallup River. At one point her legs became numb and she lost consciousness. She could not be revived. Inspectors found a close by irrigation pipe energized to 280v and suspect this is the cause. No reports of injuries to the friend.
41. June 10, 2014 Piney Shores Resort, Lake Conroe, Conroe, TX. 8 year old boy was sitting at the end of a dock and dangled feet in water. He had an unusual movement and fell into the water. Later found unresponsive by father and pronounced dead at hospital. Exposed electrical wiring was found on the dock. Electrocution, not drowning was determined to be the contributing cause of the death.
42. Apr 23, 2014 Lake Powell, UT. A 22 year old man jumped off the stern of a boat docked at the Bullfrog Lake Marina. He surfaced briefly then went back under. His death was caused by electric current leaking into the water from a boat docked at the next slip over. The cause of the leakage is being investigated.
43. Sep, 2013 North Miami Beach, FL. A 7 year old boy was electrocuted at his home in the family swimming pool. An older brother felt a shock and urge the victim and a younger brother to get out. The victim did not hear his brother, and immediately thereafter was killed. A rescuer performing CPR put his hand in the water and felt a shock. A faulty swimming pool light is the likely cause of the accident. The presence of a GFCI was not mentioned in the newspaper reports.
44. July 25, 2013 Houston, TX. An older man was killed in a swimming pool attempting to rescue a child. Faulty pool lights were suspected as the cause. Date approximate (Labor Day weekend, 2013).
45. July 19, 2013 Ellijay, GA. A 19 year old girl was electrocuted after a power outage at a home where she was watching a 5 year old girl. A power line came down about 25ft from the house. She went outside to investigate the power outage and either stepped in puddle of water or soggy ground. The voltage gradient from the downed power line was enough to electrocute her.
46. July 17, 2013 Syracuse, NY. A 12 year old girl was electrocuted while filling an inflatable pool in her backyard. Witness say she picked up an extension cord or electric pump plugged into a receptacle, and began shaking. She then fell into the pool. Rescuers received shocks trying to get her out of the pool. Although not mentioned, it was likely that the receptacle was not protected by an operable GFCI as required by the National Electric Code for all outdoor receptacles.
47. July 4, 2013 Davidson County, NC. An 11yo girl was electrocuted in a swimming pool. It was reported that a power line wire came down in the parking lot near the pool. The girl touched the ladder of the pool and was shocked. Rescuers trying to help the girl were also shocked. Electricity was likely flowing from the downed wire into the earth, and passed through the pool enroute to its source.
48. June 30, 2013 Eagle Lake in Orrick Township, Sherburne County, MN. A man was holding a plugged-in battery charger while standing in 20" of water. He was preparing to connect the charger to his houseboat. He slipped and immersed the charger which resulted in a severe electrical shock. He died on 7 July. A woman who went to his aid was also shocked and unconscious but was revived at the scene. It is unknown whether the charger was properly grounded.

May 20, 2013

Pulaski County, KY, near South Fork of Lake Cumberland near Garland Bend. A man swimming at a private dock reaches up to pull a ladder down to exit the lake. The ladder contacted a frayed electrical wire energizing the ladder. The man was electrocuted, but was able to move his 2yo son out of danger. Others felt shocks trying to help the man.

50. Sep 27, 2012

Grayson County, KY, Rough River Lake. A 36 year old man and one of his dogs were lost near a marina boat slip. He jumped into the water when the dog was having problems. Witnesses report the man's eyes rolled back and he went under the water suddenly. Inspectors found a shore cord (with a submerged coupling between two cords) was energized and reported this was the cause of the electrocution. The man was reportedly 10-15 feet from the houseboat. They found multiple NEC violations at the marina.

51. Sep, 2012

Tims Ford Lake, Franklin County, TN. A 39 year old man was swimming from a dock when he died from electrical shock. Faulty wiring on the dock is blamed for the death. The home had been struck by lightning in the recent past but it is unknown if this is related to the electricity in the water that killed the man.

52. Aug 30, 2012

Americus, GA, South Georgia Technical College. A 19 year old woman was electrocuted in a fountain pond while retrieving her young son's ball. Efforts to assist her were thwarted by others receiving electrical shocks. Investigators found 17 violations in the electrical supply to the pond. One month earlier another student reported shocks (the pond was only drained and cleaned as a result).

53. Aug 22, 2012

Bingham County, Idaho. Two men and a woman were electrocuted in an irrigation ditch. The woman went in to rescue a dog, and the 2 men tried to rescue the woman. A faulty irrigation pump was responsible for this tragedy.

54. July 25, 2012

Los Angeles, CA. A man speeding in a car hit a fire hydrant and electrical pole. The energized from the pole ended up in the large puddle created by the broken fire hydrant. 2 women were electrocuted when they entered the puddle to try and assist the driver.

55. July 25, 2012

Tampico, IL. A 14 year old boy and girl were electrocuted while detasseling corn in an IL cornfield. A lightning strike is suggested to have destroyed the grounding system for an irrigation pump. A fault in the pump then leaked electricity into the ground creating electrical gradients across puddles and other wet areas.

56. July 7, 2012

Cohasset, MN, Pokegama Lake. Two men and a woman were shocked by an extension cord in the water, presumably from a boat lift. One of the men could not be revived and died. The other two were hospitalized in serious condition.

57. July 4, 2012

Lake of the Ozarks, MO. A 26 year old woman was swimming with her 2 stepbrothers when the brothers felt a tingling. The boys swam to one dock and were unharmed. The woman swam to a different dock, apparently where there was faulty wiring. She may have been electrocuted when she touched something metallic on this dock. She could not be revived at the scene.

58. July 4, 2012

Lake of the Ozarks, MO. A 13 year old girl and her 8 year old brother were killed by electricity while swimming near a private dock. The hot wire to an electrical outlet had chafed and shorted to the dock framing steel. This steel structure was not bonded, nor was there GFCI protection as required by the National Electric Code.

June 27, 2012

German Creek Marina on Cherokee Lake, Bean Station, TN. A 10 year old and 11 year old boys were killed by electricity in the water at a TN marina while swimming between 2 docked houseboats. An 8 year old girl also swimming with the boys was shocked but pulled to safety. Several adults and another 12 year old boy were shocked trying to rescue the 2 boys. Faulty houseboat wiring on one of the boats is believed to be one of the causes.

60. May 5, 2012

Celebration, FL. An 11 year old girl was electrocuted when she reached into a mini golf pond at an Orlando, FL resort to retrieve a golf ball. A man trying to help her was also shocked. The cause was faulty pond pump that was not protected by the required GFCI. Water came in contact with the pumps windings and electrified the small cement pond on the mini golf course.

61. Aug 15, 2011

Lake Sinclair, Putnam County, GA. A 25-year-old woman was apparently electrocuted when she reached from the water and touched either a box or bare wire on the dock (it was being worked on at the time). Another woman in the water was shocked when she pulled the 25 year old away from the dock and held her head above water. She could not be revived at the scene.

62. May 28, 2011

Traverse City, MI, Clinch Marina. An 18 year old boy died in West Arm Great Traverse Bay when an electrical fault (reportedly from dock wiring) caused current to enter the water where the boy and a friend were swimming. The friend reported feeling electricity in the water. "No Swimming" signs were posted in some locations in the marina.

63. July 26, 2010

Lake City, MN. A 50 year old man was electrocuted in Lake Pepin near a boat lift which had exposed wiring. His dog was in the water and was shocked and began to sink. Another man jumped in to rescue the dog but was shocked (he escaped the water). The 50 year old man then jumped in for his dog and appeared to have been electrocuted.

64.

Lake Freeman, Carroll County, IN. A 13 year old boy was swimming with 3 other children when they started to feel a tingle. The 13 year old attempted to exit the water at the dock but fell back into the water. The other children managed to exit the water. A water-soaked electrical junction box was located on the dock nearby and is the likely source for the electrical current in the water.

65. July 10, 2010

Removed.

66. June 21, 2010

York, SC. A 54 year old man died after jumping into a swimming pool to help his granddaughter. The granddaughter was receiving a shock from the pool's railing when the man jumped in to help her. He grabbed the pool's railing and reportedly "stuck" to it. His grandson reported that he had felt electricity in his chest when near the edge of the pool (until a light was turned off). Electric shock is the probable cause of death.

67. June 2010

Smith Lake, Birmingham, AL. A 16 year old boy was climbing a dock ladder when he suddenly fell back into the water. He was immediately unresponsive when recovered by friends. Electrocution (from an energized dock ladder) is suspected as a possible cause of death.

68. May 29, 2010

Lake Waccamaw, NC. A boy was killed swimming near a boat lift. A the owner was told by another child that he was feeling tingles in the water. The owner reached up, touched the boat lift and was shocked. He told the other kids to get out of the water. After exiting he noticed one boy face down in the water. He could not be revived at the scene. There was an open ground in the lines from the house to the dock, and one of the small junction boxes under the dock was filled with water. The cause may have also been a fault to the lift motor.

Aug 23, 2008

Stonewall Jackson Lake, WV. A 15 year old boy was climbing onto the swim platform of a boat. When he touched the ladder he received an electrical shock and he fell back into the water and reportedly drowned. A girl still in the water felt the shock and was treated and released from a local hospital. Cause was improper repair of the pedestal end of shore cord (hot and ground were reversed). It is likely this was an electrocution rather than a drowning.

70. July 28, 2007

Lake Hamilton, Hot Springs, AR. 14 year old girl swimming near a metal swim ladder with a 7 year old boy and his mother near by. Without warning the boy began to scream and his mother became incapacitated on the swim ladder. As the girl attempted to help the boy she sank out of sight. The boy's father pulled him to safety and helped his wife onto the dock. Preliminary investigation revealed an unbonded metal pole, welded to the dock, on which was mounted a halogen light, which had just been turned on by its photo cell, and had an AC fault due to chafed wires which energized the dock frame and ladder. Boy and mother required hospitalization. Voltage to ground on the ladder measured at 103 VAC. The girl was recovered later that night.

71. July 24, 2006

Lake of The Ozarks, MO Twenty four year old female attempted to exit the water using a metal ladder at the end of a private dock. She apparently experienced a paralyzing electric shock which caused her to fall back into the water and drown. Several people had reported being shocked by the ladder and the dock owner had gone to shut the power off. The dock power wiring termination was found submerged under the dock near the exit point.

72. July 14, 2006

Lake Lanier, Cumming, GA. Seventeen year old boy in water near a private dock, working on a jet ski with two friends, was overcome by electric shock. Extension cord with damaged insulation caused the metal dock to become energized. Friends also shocked, and partially disabled, could not help their friend. Father of victim fought paralyzing shock and pulled unconscious son away from dock – he could not be resuscitated. Investigation planned.

73. June 24, 2006

River Street Marina, Port Huron, MI. A 20 year old man jumped, or fell, into the water from the pier behind a 29' boat, moored stern too. He became disabled as he attempted to climb onto the swim platform. Two friends attempting to pull him onboard reported being shocked. He could not be resuscitated. Shock induced ventricular fibrillation likely cause of death. The next day an inspector reported 107vac in the water behind the boat. Subsequent investigation confirmed the voltage behind the boat. The cause was an AC to DC fault in the battery charger energizing the underwater gear and no AC to DC bonding connection.

74. June 10, 2006

Brady Mountain Resort, Lake Quachita, Hot Springs, AR. A 14 year old boy died from electric shock while swimming near a houseboat. A friend was also shocked and taken to a hospital and released. A man jumped in to help and was rendered unconscious but was unharmed after regaining consciousness. The cause appeared to be inserting a shore cord with a 30A/125V (1.5-30) plug (with the grounding pin bent back) into a 50A-125/250V receptacle in such a way so as to energize the neutral, which was connected to the bonding system, thereby energizing the hull.

75. May 22, 2006

Lake Michigan, Racine Harbor, WI. A 56 year old man was killed when he went swimming from the stern platform of a boat. Inquest listed death as "Accidental Electrocution" and did not establish a root cause. Victim's wife stated that the Reverse Polarity light flickered on and went out when power applied to vessel. Comment: A reverse polarity situation along with a grounded neutral can energize underwater metals on a boat.

Mar 18, 2006

Weiss Lake, Cherokee County, AL. A 24 year old young man was killed while in the water near a pier. He was attempting to rescue his friend who had become paralyzed by an electric shock while trying to exit the water via a metal ladder. Another friend was also disabled by shock as he entered the water to assist. The two young men, who were shocked, were not seriously injured. There was an electric windmill on a metal tower attached to the ladder, and was apparently powered by an incorrectly modified extension cord, and which may have been connected to a non-functioning GFCI outlet. A bystander on the dock pulled the power cord just in time, or there may have been two more victims. Investigation underway.

77. June 27, 2005

Summerset Lake near Desoto, St. Louis, MO. In the early evening a teenage boy became paralyzed by electric shock, and drowned, while attempting to swim toward a metal ladder attached to a private dock. Two friends were rendered unconscious but were resuscitated and required hospitalization. During several investigations, initially and over the next months, it was determined that the dock wiring was properly installed, the metal dock frame and ladder were bonded, and no loads were operating at the time of the accident. However, clamping the dock supply cable with an AC ammeter disclosed 10 amps flowing (likely in the ground wire) and 4-6 VAC was measured approximately 2 ft. away from the ladder on several separate occasions. The subsequent legal action resulted in a jury finding the local utility at fault. It seems that a near-by underground power distribution cable had a defective (or missing) neutral which caused the neutral current to seek a path back to the substation through the earth and into the lake. This earth leakage current concentrated at the bonded swim ladder resulting in a lethal gradient of more than 2 V/Ft near the ladder. These earth leakage currents are fairly common but this is the first serious incident we have recorded due to this phenomenon.

78. Sept 2004

Scott's Creek Marina at Cave Run Lake, Moorhead, KY. A 19 year old girl drowned, while in the water near a houseboat, due to electric shock caused by a battery charger in the engine compartment which had become partially submerged and energized the hull. Owner had rewired the boat with no bonding system. Another girl sustained burns on her legs while reaching into the water to help the victim. A nearby rescuer swam toward the scene and was shocked and paralyzed by the electrical field. Only two feet from the victim he had to turn around and swim out of the field to survive.

79. Sept 13, 2004

Lake Of The Ozarks, MO 22 year old male stepped on an electrical cable upon exiting the water after swimming behind a private residence – fell face down into water unconscious – could not be revived. No information on cable.

80. Aug 8, 2004

Ross Barnett Reservoir, Ridgeland, MS. A 16 yr old boy was swimming in the marina when he approached a houseboat. He screamed as if in pain and disappeared under the water. He could not be revived after divers recovered his body. A friend in the water also felt a shocking sensation. The cause was a home made shore cord, hard wired to the panel which was passed through a hole in sheet metal siding with no chafe protection. The insulation was cut by boat motion and shorted the hot conductor to the siding. The siding was not adequately grounded to the shore grounding system but was connected to the boat's bonding system, which caused the hull to go up in potential killing the boy.

81. June 19, 2004

Lake Travis, Austin, TX. Young man, in good health, swimming, in evening, unobserved, between two sections of marina dock – disappeared. Came to surface two days later. No toxic substance found on post mortem, but Joule marks (electrical contact points) found on right wrist and left leg and shin. Suspected electric shock drowning. Accident under investigation. (See follow-up, last page)

- June 5, 2004 Lake Waccamaw, NC Ten year old boy drowned while swimming with friends near a private dock boat lift that had just been raised from the water. An adult reported a heavy shock when touching the lift and several children in the water reported being shocked. Victim was noticed motionless face down nearby – could not be revived. Lift frame had become energized and the bonding conductor from the supply panel was not connected.
83. Aug 3, 2003 Lake Wylie, Charlotte, NC. Two young boys swimming at bow of houseboat called for help. Father of victim and friend rushed forward – boy on ladder said he was being shocked, other boy in water not moving. Friend rushed aft to pull shore cord as father went onto water – his son could not be resuscitated. May not be exact sequence. Causes of energized hull were substantial errors in wiring on the dock as well as on the boat, apparently done by non qualified individuals.
84. June, 2003 Bull Shoals Lake, Bull Shoals, AR. Diver found Aug. 5 in shallow water 8 ft. from his dock, drowned. Incorrectly wired dock junction box caused 117 VAC to appear on metal dock components. Rescue diver reported feeling shock sensation 20 ft. from dock!
85. May, 2003 Allatoona Lake, GA. Six wildlife fatalities (ducks!!) Houseboat pulled away from the dock and still connected shore power cord separated in middle and fell into water. Six dead ducks found floating nearby.
86. May 31, 2002 Cape Coral, Florida. Double drowning, section of re-bar driven through power cable to back yard boat lift caused line potential to appear on lift frame, salt water. Ventricular fibrillation likely cause of death – not confirmed.
87. March, 2002 Lake Cumberland, Monticello, KY. Double drowning (mother and daughter), fault on houseboat, fresh water. 125V plug at boat end of shore cord rewired by owner for 220V – L2 connected to “GR” pin - ground lead in 4 wire cord cut and taped off! Hull rose to line potential.
88. Sept 15, 2001 Bay Marina Boat Works, Biloxi, MS. Some electrical work had recently been done at this yard, which resulted in reverse polarity connections at the shore cord receptacles for the stored boats. Over a short time period several boat owners reported being shocked as they worked on their boats, and one owner was electrocuted. The possibly of a missing ground combined with a ground- neutral connection on the lethal boat was not investigated.
89. June 6, 2001 Farr Shores, Lake Hamilton, Hot Springs, AR. Girl receiving electric shock after water-sliding into water at stern. Man attempting rescue drowns. Reverse polarity, neutral to ground fault in a light fixture on the boat, and poor bonding to the service caused the accident, fresh water. Boat unplugged in time to save girl.
90. May, 2001 Residence, Timber Ridge Dr., Dumfries, VA, Lake Montclair. Two young boys entered water near pontoon boat. Battery chargers (2) connected to modified extension cord from house. Electric shock drowning – cause of energized hull not reported.
91. Apr 10, 2001 New Orleans, Electrocution – Boy using conveyor to transfer shrimp – no ground, salt water.
92. 2000 or 2001 Norris Lake, LaFollette, TN. Two teenage boys swimming behind house boat. One boy climbed onto swim platform complaining of feeling severe shock – other boy fell back from ladder– his head *not* below water (ventricular fibrillation?). Could not be resuscitated. Damaged power cable to boat, black lead energized hull, ground wire burned in two – breaker did not trip due to incorrect connection (may not be exact sequence).

- Sept 30, 2000 Put-in-Bay, Ohio, Grand Banks 42. Owner's prescription sunglasses went overboard. Young bystander disappeared while trying to retrieve glasses, electric shock drowning.
94. Aug 1, 1999 Tims Ford Lake, Winchester, TN. Two boys (21&22). Electric shock drowning. Rescue diver felt electric shock. Live wire in water near dock.
95. July, 1999 Multnomah Channel, Portland, OR. 8yr old boy tubing with friends in freshwater marina along slow moving river. Boy decides to swim to dock (was wearing type 3 life vest). Suddenly he rolled over on back near the stern of a boat. Mother enters water and helps get boy on dock (she felt tingle in water). Diagnosed as electrocution (head was above water almost all the time). Cause was AC to DC short on boat and no connection between AC ground and DC ground. 84vac measured behind stern upon subsequent investigation.
96. July 18, 1999 Lake Mohave, AZ. Young man swimming toward stern of a house boat became disabled and drowned, fresh water. Boat had a neutral-ground bond. Home made shore cord "Y" became partly disconnected causing hull to become energized. 17vac measured behind stern-drive.
97. July, 1999 Cedar hill Lake, Smithville, TN. Two young boys, with flotation devices, were discovered in water, face down, a few feet behind a houseboat. 7 year old could not be revived. 8 year old recovered. Electric shock drowning suspected.
98. Approx. 1999 S. Carolina, single drowning – 3 feet of water, woman in great distress, husband attempts rescue and drowns, fresh water.
99. Sept 1998 Rio Vista, CA. Several boys reported a tingle while swimming in this fresh water marina and got out of the water. A short time later two other boys, 8 – 10 years old, drowned at the same spot. Forty-year-old power wiring running under moored boats found to have substantial fault to ground because of insulation failure.
100. Approx. 1998 Lake Sonoma, CA. Single drowning, young girl in great distress, fault on dock, fresh water.
101. July 1997 AF Base, Washington, DC, boy walking on ice slipped and grabbed exposed wires on dock that were supposed to have been de-energized, electrocuted.
102. Feb 1995 Lake Mead, NV. Single drowning, fault on houseboat, freshwater.
103. Approx. 1994 Bolling AFB, Washington, DC. Young boy reaches from water and grabs support structure for electrical junction boxes receiving lethal shock. Bare energized wires found touching metal case inside junction box. Grounding wire had been cut and never reattached to the junction boxes.
104. Sept 1993 Texas, single drowning, fault on boatlift, salt water. Cause of death not available.
105. August 1993 Oklahoma, single drowning, fault in submersible pump, fresh water.
106. July 1993 Alexandria Bay, NY. Double drowning. Two teenage girls snorkeling near dock were paralyzed by electric shock and drowned. Fault was in dock wiring gnawed by rodents. Two bystanders entered the water to lend assistance, but were shocked by the voltage in the water (they were treated at hospital and released).

- May 11, 1991 Oklahoma, single drowning, fault in dock lights – energized dock frame, fresh water.
- 108 July 1991 Lake Hamilton, Hot Springs, AR. A canoe carrying four young boys tipped over a few dozen yards from a dock. As they swam toward the dock they felt a light tingle. Three of the boys diverted away from the dock while the fourth boy continued into the electric field and drowned. Cause was broken insulation on a dock wire hanging in the water.
- 109 Dec 1989 Oklahoma, single drowning, fault in dock wiring, fresh water.
- 110 Apr 23, 1988 Oklahoma, single drowning, fault in submersible pump, fresh water.
- 111 July 1988 New York State University at Albany. Sophomore waded into a pond on campus and was electrocuted. Several others injured in rescue attempt. Cause was broken electrical cable under the ground.
- 112 1987 or 1988 Park Township, MI, Lake Macatawa, Bay Haven Marina. 18-year-old boy falls off dock, in great distress, two attempts to assist thwarted because of severe electric shock as rescuers entered water.
- 113 July 29, 1986 (A) Gross Pointe Yacht Club, single drowning, diver, fresh water
(B) Petosky, MI, single drowning, diver, fresh water. NOTE: Both incidents relayed 3rd hand.
- 114 June 8, 1986 Harrods Creek, Lexington, KY – Ohio River. About 2030 two dogs jump into water from owners 20 ft. runabout, and were observed to be in great distress. Owner's wife jumps in to help and was immediately in trouble. Husband goes in to save his wife – both drown. Rescuers felt strong electric shock and could not approach victims, but were able to rescue dogs later. Faulty light switch and missing ground on nearby houseboat determined to be the cause.
- 115 Date Unknown St Croix River, Prescott, Wisconsin. 44 year old swimmer dove off of the dock near his 28' power boat. As he approached the swim platform he said he felt like he was being shocked, and was becoming numb, and then disappeared below the surface. Recovery and attempted resuscitation in a matter of minutes were unsuccessful. Battery charger had faulted to its metal chassis, and the boat's mfr. had deliberately not installed the AC grounding wire to the boat's bonding system – as required – causing AC potential to appear on the underwater metal gear.
- 116 Date Unknown Community swimming pool in Oklahoma, 10 year old electrocuted while inserting coins in a soda vending machine. Power cord damaged by one of the 4 legs, grounding pin on plug missing, machine chassis later measured at nearly line voltage, NO GFCI.

ELECTRIC SHOCK – NEAR MISSES
(Additional ones included above)

- July 11, 2025 Porter County Indiana, Marina Shores marina. The investigation revealed an object that belonged to a boat owner fell into the water from the dock and began floating away, according to investigators. Authorities said a 21-year-old voluntarily went into the water to retrieve the object for its owner. As he swam back to dock he appeared to be in distress. His 23-year-old brother jumped in to rescue but was also overcome by electricity in the water. He was pulled to safety. The 21-year-old was later recovered from the water. Authorities said investigators and a licensed electrician determined the likely source of the electricity in the water was from a piece of equipment belonging to a nearby slip holder.
2. June 21, 2025 Blue Ridge Lake, Fannin County GA. A 13-year-old boy was electrocuted when trying to exit the water of a private dock via a metal ladder. Two other boys tried to rescue him but were shocked themselves, along with another woman who was hospitalized from the electric shock. A Fannin County official investigated and found numerous electrical deficiencies, but specifics are not yet known.
3. July 4, 2024 Smith Mountain Lake, Huddleston, VA. An 18yo man jumped into the water at the lake. After recognizing the man was in distress, 2 others jumped in to help. They felt the electrical shock and were able to get out of the water. The 18yo perished from the electric shock drowning. Details pending.
4. Nov 4, 2020 Bradenton Beach, FL. During tropical storm ETA a man was sand bagging the outside of his home. He went into the ground floor storage space where there was 3" of standing water. He was electrocuted in the water. A friend walked in the water in an attempt to rescue but received electrical shocks and had to abandon the effort. Authorities report the clothes dryer was the source of the current.
5. Aug 12, 2020 Peoria AZ, Scorpion Bay Marina, Lake Pleasant. 2 brothers were killed in the water after the first started screaming when he jumped in next to their boat. Two others jumped in and were rescued and treated. Investigators found a modification to the shore power cable system which energized boat's underwater metals. Took 10 min to get the power secured for rescue operations.
6. May 11, 2020 Lewis Smith Lake, Alabama. A woman received electrical shocks when entering the water at her non electrified dock. Electricity was leaking into the water from the dock next door. She was able to swim toward shore away from the dock. She grabbed a dock cable and was shocked even worse. A friend used a pole to pull her out of the water at the shore line. She said her feet were paralyzed and burning.
7. July 19, 2019 North Potomac, MD, Westleigh Recreation Club. An adult and child received electrical shocks while swimming in the pool. Neither person's injuries considered life threatening. Fire department said an electrical hazard ended up in the water from an unknown source.

- Jun 2, 2019 Universal Studios, Orlando, FL. Numerous people, including staff and guests received electrical shocks in the water at the Volcano Bay attraction. No reports of injuries after hospital and paramedic examinations. One lifeguard reported anonymously that a water coaster had developed a short circuit. Update to follow if more is learned.
9. Nov 6, 2018 Laconia, NH. Paugus Bay. A dog jumped into the bay and was electrocuted. A woman, the dog's owner began to wade into the water to rescue the dog. She felt a strong electrical shock but no report of further injuries. The power pole had been placed in the water near the dock for a flood light. The electric line that branched off the dock service to supply the flood light was in the water. The wire was disconnected to facilitate retrieving the dog.
10. Sep 30, 2018 Oklahoma City, OK. Bricktown Canal. One man was electrocuted after falling into a canal in the city. He reached up to grab a light post to get out and received a fatal electric shock. Another man jumped in trying to help. He received a strong electric shock and was hospitalized (no status on the rescuer). Electrical fault and lack of grounding was cause.
11. Jul 4, 2018 Canfield OH. A mother was sitting at her pool with legs in the water. She began to feel a tingle. Then felt it with her hands in the water. Ordered son to get out of the pool. Electric company it's just a stray voltage. Faulty pool wiring is suspected as the cause. No mention of GFCI use.
12. Jul 3, 2018 Lake of Ozarks, MO. Rocky Mount on 5 Mile Marker. A woman received an electric shock as she grabbed onto a metal dock ladder. An arc crossed from the dock ladder to a ring she was wearing. Authorities measured 15volts AC in the water. There were also several children in the water. No reports on if they were affected. A faulty water heater in the home was determined to be the cause. There had to be some open grounding as well.
13. Jun 11, 2018 Camelot Cove, Camdenton, MO. Lake of Ozarks. Swimmers (number unknown) felt an electric shock in the water while swimming. An energized wire was found dangling from a nearby dock.
14. Jun 5, 2018 Smith Mountain Lake, GA. A 17yo girl was shocked in the water when touching a metal object believed to be part of a boat lift. She was taken to a hospital and released. Officials stated that the electricity came from aging wire on a boat lift. No mention of GFCI use.
15. May 14, 2018 Lake Taney Como, Branson, MO. A man's grandson received a shock in the water around their dock. The cause was a faulty electrical system THREE docks down.
16. Sep 1, 2017 Houston, TX. 5 men were conducting rescue operation from a boat in the flood waters of Hurricane Harvey. The boat drifted into live powerlines killing 2 of the men. The other 3 were rescued downstream and suffered electrical burns.
17. Jul 24, 2017 Kelowna, British Columbia. A man was walking his dogs when they bounded into a creek. The dogs started yelping in distressed. The man reached in to help the dogs and was badly shocked. The dogs died. The man survived the shock. A faulty pond pump is responsible for the accident.
18. Jul 3, 2017 Lake Keowee, SC. A woman's son was under their boat investigating a faulty speedometer. He grabbed a crossmember of the boat lift and was shocked. He responded to treatment in the ambulance and recovered quickly. The boat lift was not properly grounded.

- Jul 7, 2017 Canyon Lake, CA. 2 kayakers felt an electrical tingle in the water. Authorities were investigating. No updates.
20. Jun 27, 2017 Menemsha Beach, Martha's Vineyard, MA. A group of third graders felt a tingle in the water at the beach. Management also felt tingles at the nearby dock. The power was immediately secured. The area is being repaired. Exact cause unknown.
21. Jun 17, 2017 Put-In-Bay, OH. A 19 year old boy was killed by electricity in the water around the family boat docked at the Miller Marina. The boy's father jumped in to the water to rescue the family dog who had fallen in. The man struggled and went under. His two boys jumped into rescue. Both were shocked. The mother pulled the plug for the boat and the electricity stopped. The 19 year old was unresponsive and died. The father and other brother survived after receiving electrical shocks.
22. May 19, 2017 Florence, AL. A woman was injured by electrical shock when trying to help her son who went into swimming pool to rescue his father. The father and son both died. Cause is unknown.
23. May 8, 2017 Ottawa, Canada. A man ran into a flooded street to stop a motorist going to fast. He fell and contacted an electric cord powering a submersible pump. He was shocked and taken to the hospital. There was no ground fault protection for the pump. Unknown if he survived.
24. May 1, 2017 Rochester, NY. A homeowner rigged a portable electric sump pump to pump out a flooded backyard. He stepped into the water to turn on the pump and received a significant shock in his legs. Had he fallen he likely would have been killed. The motor had an electrical fault and it was not connected with through at GFCI protected outlet.
25. Oct 7, 2016 Shiloh, MO. A worker was pulled from an electrified puddle of water at a business. He was using saw to cut concrete. A second worker tried to pull him out of the water but was shocked. Rescuers were able to get the man out, perform CPR, and revive him. The electrical source for the tool was likely not protected with a GFCI (as would have been required at the construction site).
26. Jul 3, 2016 A Tennessee Lake, TN. A 13year old boy was swimming from a boat. He was noticeably in trouble when 2 adults jumped in to rescue. They were both overcome by electric shock. They were able to save the boy. Exact time and location are unknown. Story reported by WSOCTV.com in Charlotte, NC.
27. May 29, 2016 Silver Spring Township, PA. An 8 year old girl was among 8 kids swimming in a backyard pool. When the pool light was turned on 7 other kids were able to get out of the water. The cause was a faulty pool light circuit.
28. Apr. 16, 2016 Smith Lake, Priceville, AL. Two teenage girls entered the water from a private dock. Both girls were getting shocked in the water. One girl drowned, the other treated and released from hospital. The victim's father and son jumped into the water to assist. The father blacked out after both were feeling the shocks. The power was turned off at the house, after which the father came to and survived along with son. A missing ground and faulty lighting fixture are suspected to be the cause.

- Mar 27, 2016 Palm Springs, CA. Six people were shocked in a private swimming pool, one of them a man who jumped in to rescue his daughter. He was overcome by electric shock and pronounced dead at the hospital. The 5 others were treated, and one young girl remained hospitalized in critical condition. Faulty pool wiring is suspected as the cause. Homes were built in 1963, but not sure of the age of the swimming pool.
30. Aug 25, 2015 Portsmouth, NH. A diver in mid 20s was shocked while cleaning a boat at Portsmouth Naval Shipyard in NH. Faulty wiring is suspected as cause.
31. June 21, 2015 Lake of the Ozarks, Woods Hollow Cove, 22.2 mile marker, MO. A 21 year old man and fellow swimmer felt electricity in the water near a dock. The 21 year old grabbed a dock ladder to get out when he was electrocuted and fell back into the water. Someone ran ashore and turned off the power likely saving the other man in the water. A faulty junction box between dock and residence is suspected. The occupants tried to reset the circuit breaker but it would trip after 10-15 seconds of being turned on. The last attempt to turn the breaker on coincided with the 2 swimmers being near the dock as it got dark (breaker controlled dock lights).
32. Apr 27, 2014 Hialeah, FL, condominium community pool. At least 3 children and 2 adults were shocked from an electrical fault in an improperly grounded pool pump. The children recovered after 4 days in a hospital.
33. July 4, 2014 Lake of the Ozarks, MO, 7 mile marker. Several people were swimming at a private dock when they started feeling tingles. Turning off power at the dock did not solve problem. Contractor found a electrical short to an abandoned boat ramp about 100yds away. Power was disconnected and the electricity in the water ceased.
34. July 2013 Lake Norman, NC. Time frame approximate. Man swimming off docked boat feels shock and paralysis from electric current. He is able to move far enough away to regain control. Cause unknown.
35. July 11, 2013 Lake of the Ozarks, MO, 35 mile marker. 8 college age girls were swimming around some docks with electrical service. One of the girls felt her arm go numb. She swam the other direction and the numbness went away. Several other girls felt tingling and were shocked trying to exit at a nearby dock.
36. June 18, 2013 Scott City, MO. After the neighborhood became flooded, a woman went down her flooded basement attempted to rescue a cat. She began unplugging electrical cords when she began getting shocked. She rescued the cat and got on top of some floating furniture until rescued. Likely the circuits involved were not protected with GFCIs.
37. May 27, 2013 Lake Lanier, Gainesville, GA. A man and his 6yo daughter were swimming 10ft from a dock when the man received an electric shock in the arm. He grabbed his daughter, swam to the dock and lifted her to safety. Then he was shocked at least 2 more times, but survived. Appears to have been an intermittent problem possibly correlated to a power outage in the vicinity. Cause is unknown.

Aug 14, 2012

Garden Grove, CA. Two girls (15yo and 23yo sister) were swimming in a swimming pool when the teenager called out and went face down in the pool. The older sister's legs and arms went numb. The father was able to get the girls out of the pool (and was also shocked when pulling the girl out). Paramedics were able to restore the teenager's breathing and pulse. She is expected to make full recovery. Cause unknown but work had just been done on the pool which had underwater lights.

39. Aug 4, 2012

Gravois Arm of Lake of the Ozarks, MO. A woman received a shock as she reached for a dock ladder while swimming. She swam away from the dock. Her husband did the same and confirmed the shock. They both swam away and exited the water at a neighbor's dock because of awareness following 3 deaths from electric shock a month earlier.

40. July 23, 2012

Lake of the Ozarks, MO. Two children and one adult were swimming near a dock undergoing electrical repairs. They all felt an electrical shock in the water. Power to the dock was turned off. The swimmers exited the water without serious injury. Exact cause is under investigation.

41. July 4, 2012

German Creek Marina on Cherokee Lake, Bean Station, TN. A 10 year old and 11 year old boys were killed by electricity in the water at a TN marina while swimming between 2 docked houseboats. An 8 year old girl also swimming with the boys was shocked but pulled to safety. Several adults and another 12 year old boy were shocked trying to rescue the 2 boys. Faulty houseboat wiring on one of the boats is believed to be one of the causes.

42. June 27, 2012

Celebration, FL. An 11 year old girl was electrocuted when she reached into a mini golf pond at an Orlando, FL resort to retrieve a golf ball. A man trying to help her was also shocked. The cause was faulty pond pump that was not protected by the required GFCI. Water came in contact with the pumps windings and electrified the small cement pond on the mini golf course.

43. May 28, 2012

Lake of the Ozarks, MO. 3 women were shocked while swimming near a dock. Someone turned off the power fast enough to save them. One needed CPR at scene. All survived. The older dock had no GFCI protection and an "inadequate ground wire from dock to shore".

44. Aug 28, 2011

Near Shady Beach, Norwalk, CT. A dog was electrocuted in floodwater from recent storm (Hurricane Irene). The two women walking their dogs felt electrical shocks (other dog, leashed, survived). Witnesses report "water boiling" where a grounding cable was entering standing water. This is indicative of electrical current in the water.

45. June 21, 2011

Charleston, Kanawha River, Lou Wendell Marine, WV. A woman entered the water via a boat ladder for a swim. She was overcome by electrical current and reportedly could not escape, then sunk below the water for approx 90 seconds before being rescued. An electrician reportedly found a grounded neutral in the pedestal, but the exact fault is unknown.

46. March 18, 2011

Houston, TX. A dog jumped into a neighborhood retention pond with fountain and was killed by an electric current in the pond. A man went in after the dog but when he was ankle deep he could feel the strong electric current in his feet so he retreated. Power was secured to the fountain. Comment: Had the man dove into the pond, he could have become a casualty as well.

- Sept 5, 2010 Lake at Perrine Wayside Dog Park, Miami, FL. Man playing fetch with dog threw object into a lake. The dog jumped in and swam toward a fountain in the center of the lake. The dog began yelping and struggling. The man went in the water to help his dog, but was stopped by electric shocks and could not reach the dog. The dog died, the man survived. The fountain was turned off but it was still putting electrical current into the water. It was removed for inspection.
48. Sept 5, 2010 Hartwell Lake, Anderson, SC. A 12 year old girl was playing in the water near a dock with a friend. She grabbed an electrical wire and went into cardiac arrest. She was resuscitated by her father and airlifted to a hospital. The police report stated that there was a grounding problem on the dock.
49. Aug 8, 2010 Green River Lake, Campbellsville, KY. A woman swimming behind a houseboat was seen arching back and sinking in the water. She surfaced long enough to scream for help. A man on the boat attempted to pull her out but was badly shocked as he was trying to help. Another man on the boat was able to pull both of them out of the water using a rope after turning off the boat's power. Another houseboat owner attempted to swim to them but was turned back due to the electrical current in the water. The woman and man pulled from the water were treated and released from the hospital.
50. July 31, 2010 Lake Champlain, VT. A father and his two 13-year-old sons were shocked, but survived. No further information.
51. July 3, 2010 International Harbor, Friendsville, TN. Three females, 12, 20, and 30 years old were shocked while swimming near a docked boat. When the boat's power was turned off, the electrical current went away. Two of the three swimmers were injured and required hospitalization. One was not breathing when EMS arrived. They were able to revive her. A 63 year old woman was shocked trying to assist the other three in the water. She also required hospitalization. The cause was never determined.
52. June 24, 2010 Lake Travis, TX. A 15 year old girl and her 8 year old sister were swimming by a private boat dock when they were shocked in the water. The older sister was unresponsive at the scene and was in critical condition in the hospital. Shoddy wiring of boat lift resulted in direct hot to frame short with no grounding connection. Girls survived.
53. May 24, 2010 Clear Lake, IA. A man was throwing balls to his dogs from the dock behind his house. One dog approached the boat lift and went under. The man jumped in and received an electrical shock in the water. Family members quickly turned off the dock power. The man survived, the dog did not. Exact cause of fault not known.
54. Sept 2007 Franklin Lock Campground on the Caloosahatchee River, FL. Boat docked in freshwater marina receiving AC shore power. Owner was cleaning prop shaft under the boat using a metal scraper. As his foot touched the bottom and the scraper connected the shaft and the strut he felt an electric shock which caused his "teeth to clench and muscles to contract". He also saw blue sparks at the scraper. After the shock he was able to exit the water and observed that one of two 30amp shore power breakers had tripped. He was not wearing a wetsuit.

- Aug 28, 2007 Private pond, Eden, NY 22 year old male entered the pond in an attempt to rescue his dog, which was in great distress, and was thrown back and lay unresponsive. His father dragged him from the water and started CPR which was continued by the rescue squad on the way to the hospital, where he is still recovering as of 9/1. Submersible irrigation pump was considered likely cause.
56. July 20, 2007 Lake Arcadia, Edmond, OK Adult male entered water at the end of a private dock and was immediately paralyzed by electric shock, and began to sink. His wife, reaching from the dock, kept his head above water. A bystander, entering the water from his boat was also shocked so he got back into the boat and assisted the wife in pulling the man onto the dock. High water had submerged the electrical outlets at the end of the dock.
57. July 1, 2007 Collins Bay, Lake Ontario, Kingston, ON. As a SCUBA diver, with no wet suit, approached a moored sail boat he felt a tingling sensation. Approaching closer he experienced a moderate electric shock so he backed away. Later examination disclosed damage to a steel dock section at the boat's stern and the battery charger was found to have a "short circuit". The condition of the bonding system was not reported.
58. August 2006 Lake Michigan, Racine, WI. Owner decided to check underwater as he was having vibration on one engine. He donned scuba gear and jumped in water. When he touched the bronze prop he was hit with current that almost paralyzed him causing great difficulty in breathing. He was able to get away from the zone of danger. Cause is thought to be the boat in the next slip. A yellow barrel connector on the water heater Neutral #16 wire was loose, due to the terminal being the wrong size and not correctly crimped. It heated up which burnt terminal insulation and shorted the hot to the grounded case. As the phase did not see excessive current, the breaker did not trip. The neutral dock pedestal socket pins had corroded due to poor connection and the ensuing heating so that eventually only intermittent connection was made. The diver's wetsuit may have saved his life. He was only inches from the neighboring boat when touching the prop on his boat (which provided the path back to the source).
59. July 2, 2006 Lake L'Homme Dieu, Douglas County, MN. Three men were nearing an aluminum dock in an outboard boat (aluminum hull?) when the prop caught on an extension cord laid under water (powered a boat lift), and were severely shocked as they entered the water. Possibly two of the three men entered the water to rescue the third man who had fallen face down into the water, half out of boat, and was not moving – exact sequence not known. A bystander unplugged the cord. The third man spent several days in the hospital. No investigation planned.
60. July 2005 Brooklyn, NY. A diver went into the water behind a boat in this small, private marina. He surfaced seconds later complaining about tingling and pain in his arm. A probe in the water measured 40vac to ground behind the boat. Cause was determined to be a neutral-ground short on a recently installed water heater (although there was most likely a bad ground too at that pedestal to cause this). He was wearing a short, spring wet suit.

- June 24, 2005 Lake Ontario, NY. A man was badly shocked and paralyzed on a ladder going into the lake from his boat. The power was turned off and he regained feeling and control of lower body. He was connected to the dock via an extension cord. The reverse polarity on the boat lit up but since everything was working he ignored it. Later found that there was no green ground wire in the dock's electrical wiring. He likely had a grounded neutral on the boat which allowed the boat's hull to be energized to line voltage.
62. July 2004 Sahauro Lake, AZ, a man-made, freshwater lake near Phoenix. A man was diving to perform maintenance on a dock structure. He left the water after feeling a tingling sensation in the water near a pontoon houseboat. The shore cable was disconnected from the boat and the diver resumed his work without further incident. The cause may have been an improperly wired battery charger on the boat.
63. July 2004 Sacramento River, CA. Man entering water around several boats (being supplied by genset power from one of the boats) receives shock in water. Two other men jump in to rescue man. One of the 2 rescuers became imperiled. Generator secured immediately. Incorrect wiring on one boat caused a ground fault which introduced current into the water between boats.
64. May 31, 2004 Lake Barkley, Grand Rivers, KY. After receiving permission from marina two adult women went swimming near their rented houseboat. As they started back to the boat from the swim slide entry point both felt a strong electric shock sensation, and had the presence of mind to *swim away* from the boat! A relative entered the water and felt the same thing – which disappeared when the boat was disconnected from shore power. Close call was brushed off by staff so no action was taken to locate source of fault current. A fatality waiting to happen!
65. August 2003 Green River, Campbellsville, KY. Marina manager using Hioki clamp-on ammeter checking shore cords for leakage and discovered one houseboat with 4 amps on one of two shore cords. Hull potential to dock ground 8 VAC and owner commented that one of his children reported a tingle in the water!! Boat had just been reassembled after being trucked from Texas and problems were being experienced with 120 VAC deck light. Deck lights were rewired and neutral / ground fault in inverter was cleared – leakage current no longer exists.
66. July 2002 Allatoona Lake, GA. Three swimmers in great distress near houseboat, by stander pulls shore cord, all saved, one spent several days in hospital, fresh water, and fault on boat.
67. Fall 2002 Lake Murray, SC. Swimmer reports strong tingle, hi-level fault currents in dock frame, fresh water.
68. Date Unknown Man jumps into water to rescue dog, feels high level tingle, cause unknown, fresh water.
69. 2002-2003 Florida, interviews with divers – many reports of high level tingle while cleaning bottoms, all salt water, and no fatalities.

- Sept 2000
Niagara River, Grand island, NY – On the dock behind his home the owner watched his dog sink near a steel piling while retrieving a ball. He jumped into the water to rescue the dog and found himself sitting on the bottom in 5' of water completely paralyzed. In a few seconds he began getting tunnel vision and assumed he was going to die. Within the next few seconds a slight current moved him about 4' away from the steel pile. He was able to get his head above water and move another 8' to a ladder. A romex cable, which powered a light on top of the piling, had chaffed and caused the energized conductor to contact the pile. The dog was lost.
71. Date & Location
 Unknown
Swimmer feels a tingle as his hand enters the A/C discharge stream. Cause not determined, salt water.
72. July 3, 1998
Lake Chelan, Chelan, WA. 21 year old exiting water – shocked on swim ladder – 48 hours in the hospital – rescuers shocked.
73. August 1995
Lake Cumberland, KY, Jamestown Resort and Marina. Seven children swimming behind houseboat received electrical shocks (no fatalities). Lights went out on boat and children immediately started screaming. Cause was loss of neutral, a neutral-ground connection on the air conditioning system and a poor grounding connection on the shore cord. The grounding connection deteriorated when cooking loads were energized causing a loss of return path to the source (reason lights went out).
74. 1982
Egg Harbor, WI. A 23 year old woman was swimming from a dock, when she grabbed onto a dock cleat to pull herself out of the water. She screamed "I can't let go!". Her hand went completely numb. A passerby kicked her hand off the cleat causing her to fall back into the water. There were no reported injuries. An open neutral was found afterwards which likely contributed to the mishap.
75. July 1981
Brackish water on the Connecticut River in Essex, CT. Diver checking zines felt strong "electric pulses" as he approached the boat so he backed away. After securing power to the boat, the electric pulses were gone (exact fault unknown)

CODE VIOLATIONS

1. January 1994 Oklahoma State Department of Health (OSDH) inspected eleven commercial docks and five private docks, and an earlier (1989) inspection of 116 commercial docks, found 96% not in NEC compliance; most common fault was *open* ground.
2. Aug 8, 2004 Follow-up to #9 in the Electric Shock Drowning Section above:
 Lake Travis, Austin, TX. Because of this accident the manager of a neighboring marina now shuts down power to the docks whenever an employee enters the water to do any kind of service. In Nov., 2005, an employee who was in the water, to move the feeder cables that run near the pier access ramp, discovered badly damaged insulation. A fatality was likely prevented because the power had been turned off.
- Follow-up

Inspection Summary – Anthony Stephens, September 1, 2023

1. The accident occurred at approximately 4:45pm on 6/12/23, in brackish water.
2. Adams Construction was performing work at the dock for 101 Overlook Pt. Mr. Stephens was a contract worker for Adams.
3. After the accident, Certified Electric disconnected dock power from the service entrance to 103 Overlook Pt. Dock power had been wired directly to the meter, with no means of disconnecting at the main panel.
4. The pool panel had been recircuited to one of the main panels in 2022 [prior to the accident]. This work appears to have been performed by an unlicensed contractor, but no problems were observed with this execution.
5. Workmanship throughout the covered area beside the house [service entrance point] and extending to the dock is deficient and not to Code. The maritime environment and lack of electrical maintenance have had a further degrading effect. At the time of the inspection, there were a litany of Code violations present, including:
 - Electrical boxes and connectors installed which are not rated for outdoor use
 - Conductors routed into boxes without any connector whatsoever
 - Electrical conduit, boxes and light fixtures secured to vegetation [trees]
 - The use of plumbing PVC conduit as an electrical raceway
 - Unprotected wire taps not inside of an electrical box [executed using both wirenuts and butt splices]
 - Missing conduit supports and straps
 - Broken PVC conduit on the floor of the covered space, with exposed wires showing. Where subject to physical damage, the use of PVC conduit in this fashion is not permitted [should be galvanized rigid or intermediate metal conduit].
 - Missing knockout covers, which permit easy entry of rodents, snakes, or other pests into electrical equipment.
 - Conductors strapped to other conduit with zip ties as a means of support
 - Holes drilled through light fixtures to route feeders. The Code does not permit such modification.
 - Extensive rust and corrosion of electrical boxes, to the extent that some are falling apart.
6. Most of the electrical deficiencies noted existed prior to the current occupants' purchase of the home.

7. Insulation resistance measurements of the [disconnected] dock conductors were taken. Tests were conducted at 525 VDC [500 VDC nominal]. Insulation resistance tests measure the quality of the insulation. Degraded insulation can result in short circuits and/or electrical arcing.

Shore Disconnect ON, all dock circuits OFF, Resistance Readings

BRN-YEL:	0.9 MΩ
GRN-BLU:	1.7 MΩ
BLU-YEL:	1.5 MΩ
NEU-YEL:	1.24 MΩ
NEU-BLU:	0.85 MΩ
NEU-GRN:	0.2 Ω

Shore Disconnect ON, all dock circuits OFF, Insulation Resistance @ 525VDC

GRN-YEL:	1.5 MΩ
GRN-BLU:	1.8 MΩ
BLU-YEL:	3.1 MΩ
NEU-YEL:	1.4 MΩ
NEU-BLU:	1.7 MΩ

Shore Disconnect OFF Resistance Readings

GRN-YEL:	0.76 MΩ
GRN-BLU:	1.95 MΩ
BLU-YEL:	Open [Infinite]
NEU-YEL:	1.5 MΩ
NEU-BLU:	0.9 MΩ
NEU-GRN:	0.2 Ω

Shore Disconnect OFF, Insulation Resistance @ 525VDC

GRN-YEL:	290 MΩ
GRN-BLU:	144 MΩ
BLU-YEL:	470 MΩ
NEU-YEL:	92 MΩ
NEU-BLU:	180 MΩ

The readings with shore disconnect off are acceptable, but those with the shore disconnect on are not, indicating that while the conductors from house to the shore disconnect are still in serviceable condition, those beyond that point should be replaced.

8. While there are many possible points in the electrical distribution system where grounded conductors or grounded metal parts could have become energized, the most likely culprit is the shore tap box and/or shore disconnect switch, which is also the area where the deceased was found. The tap box was in fact submerged at the onset of the inspection, filled with water after being removed, and the splices deteriorated. Once water contacts either of the 2 hot conductors, the water is energized and capable of causing serious shock.
9. The marine environment is in general extremely challenging for electrical installations: constant movement from rising and falling tides and river currents, with occasional strong winds and water, all of which can lead to loosening of electrical connections. In addition, brackish or salt water is quite corrosive to electrical equipment. Annual electrical inspections for such installations are strongly recommended.

Richard Pearlstein, P.E.
BTA Engineering, LLC
October 20, 2023

Lab Exam Summary – Anthony Stephens, December 15, 2023

1. Attendance sheet is included with this email [comprised of the four electrical engineers who attended the site inspection].
2. Collected evidence was laid out on an exam table. All attendees were given as much time as needed to photograph all evidence.
3. Four conductors were run from the house service point to the dock electrical panel: (2) phase [“hot”] conductors, (1) neutral, and (1) ground. The electrical path to the dock panel is:
 - House meter/main disconnect > Shore [fused] disconnect switch
 - Shore disconnect switch > Shore tap box
 - Shore tap box > Dock electrical panel
4. Before starting on destructive testing, the assembled team used paint markers to identify the different conductors as they routed through the boxes.

Type	Color	Size	Cable Date*
A-side Phase	Yellow	#1/0 AWG	4/11/15
B-side Phase	Red	#1/0 AWG	4/11/15
Neutral	White	#2 AWG	9/13/14
Ground	Green	#1/0 AWG	4/11/15

** Manufacturing date, size, cable type, and other data is printed at 2' lengths throughout the length of modern cable. The date of cable manufacture can only be considered an indicator of the installation date, because cable will sometimes sit on the shelf of an electrical distributor or contractor.*

Nominal voltage from either phase conductor to neutral or ground is 120VAC. Nominal voltage between phase conductors is 240VAC.

5. The phase conductors listed above are adequately sized to feed a 125-amp panel, accounting for some voltage drop to reach several hundred feet to the dock. Curiously, it is the neutral and not ground conductor which is undersized, indicative of either an unqualified or completely careless electrical contractor. However, the #2 conductor used for the neutral is still adequate for 100 amps with voltage drop, which is less than the dock panel loading. The conductor size discrepancy is noted here, but not considered a factor in the accident.
6. The shore fused disconnect switch was examined first. The condition of the enclosure is badly degraded, with obvious missing connectors [which seal incoming conduits], missing lock rings, substantial corrosion, evidence of arcing/excessive heating, and poor workmanship. All spliced conductors were carefully stripped of their outer electrical

tape/insulating tape, unwrapping one layer at a time, and inspecting at each layer. Photographs 4, 21, 22, 58 & 61 are of the shore disconnect switch or components/wiring inside.

7. It is not clear where the red residue/coating visible in photographs 58 and 61 came from, nor it's composition. These pictures show the splice after all covering tape was removed. However, without other evidence of faulting at this splice, the discoloration can be considered insignificant in the context of this inquiry.
8. The shore tap box was the next scrutinized. This box was regularly submerged during high tide, as evidenced by the waterline inside the box and cover. When looking at the box as mounted, there was no connector whatsoever to protect incoming cables from the left side. Therefore, any defects in a phase conductor splice inside this box would energize the surrounding water when submerged.
9. After color identification of the cables, conductors were cut, and splices carefully unwound. As shown in pictures 73 through 85, a pinhole in the yellow spliced cable is visible after removal of a single layer of electrical tape [picture 72]. The white residue around the pinhole on the inside of the insulating tape [pictures 82, 83 & 85] is oxidation indicative of the fault.

Photographs 26, 27, 31, 33, 34, 65, 72, 73, 75, 76, 81, 82, 83 & 85 are of the shore tap box or components/wiring inside.

10. Despite the horrible appearance of the shore disconnect switch, the fault occurred in the nearby tap box. Specifically, the pinhole in the yellow phase splice is compromised, and provided the path for energization of the surrounding water. That the deceased was found in the immediate vicinity of this box is not a coincidence – the voltage decreases with increasing distance from the voltage source.

Richard Pearlstein, P.E.
BTA Engineering, LLC
January 9, 2024

Patrick, Diana

From: Courtney Reich <creich@georgiaconservancy.org>
Sent: Monday, July 13, 2026 4:50 PM
To: Comments, CRD
Cc: Katherine Moore; Andrews, Jill
Subject: Proposed amendments to Subject 391-2-1 of the Rules of the Department of Natural Resources to establish rules for private docks
Attachments: CRD PRD Rule 071326.pdf

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 Jill,

Attached is our comment letter on the proposed Rules for Private Docks. While we have significant concerns regarding the significant increase in area of boardwalks allowed over the marsh, GA Conservancy fully supports the CRD's efforts to adopt Rules to govern the design and construction of Private Recreational Docks. We appreciate the due diligence that has gone into creating these standards and the challenges CRD staff face with their development and implementation. We also appreciate the opportunity to participate in the Private Dock Stakeholder Committee and to provide comments on the proposed Draft Rules. We hope that our comments will be constructive, and we thank you for taking the time to consider our input.

Sincerely,
Courtney



Courtney Reich

Coastal Director

Georgia's land. Georgia's future. Since 1967.

georgiaconservancy.org

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912-656-1316

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July 13, 2026

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

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*Executive Committee Member

**RE: Proposed amendments to Subject 391-2-1 of the Rules of the
Department of Natural Resources to establish rules for private docks located
over state-owned tidal water bottoms**

Dear Ms. Andrews:

On behalf of the Georgia Conservancy, I am submitting the following comments on the proposed Rules for Private Recreational Docks, issued by the Georgia Department of Natural Resources (DNR) Coastal Resources Division (CRD) on June 24, 2026. Georgia Conservancy is a Georgia-based conservation organization, formed in 1967 with a mission to support *healthy* lands, *thriving* communities, and a *future* where every Georgian can enjoy the outdoors for generations to come. We are uniquely blessed here in coastal Georgia to enjoy a vast, healthy marsh ecosystem due to the protection provided by the State of Georgia through the Coastal Marshlands Protection Act in 1970. DNR has been a dedicated steward of our coastal marshlands since that time.

Georgia Conservancy supports the CRD's effort to adopt Rules to govern the design and construction of Private Recreational Docks, and we appreciate the due diligence that has gone into creating these standards and the challenges CRD staff face with their development and implementation. Georgia Conservancy staff served on the Private Recreational Dock Committee, and we applaud DNR's efforts to regulate private recreational docks constructed over public trust tidal waters to ensure safety, consistency, and protection of our coastal marshlands.

Water access is a way of life in coastal Georgia. Residents and visitors are drawn to our coastal marshlands for the fishing, boating, and scenic views. DNR has long worked to provide access to these resources held in public trust for all of us by the State of Georgia. While private recreational docks do facilitate access for certain marsh-front property owners, they do not do so without impacts, and balancing this private property right with public resource impacts is critical.

Georgia Conservancy was pleased to see that the proposed Rules create a comprehensive framework for regulating dock construction that includes requirements for electrical permitting, restrictions on use of construction equipment in the marsh, and protection of manatees. We also support the requirement that dock owners must promptly remove and properly dispose of all debris that originates from, or is generated by, their private dock. All of these requirements will benefit coastal Georgians and protect our coastal marshlands.

While some recommendations of the Private Recreational Dock Committee were addressed, the Report of this Committee, which represented the majority of members, recommended the following elements that were not included in the proposed rules. We recommend that DNR consider addressing these issues through this Rule adoption process:

- An objective and *science-based* process to consider how variances to current dock standards, including maximum dock dimensions, are granted.
- Adoption of a dock builder certification program and design standards for docks.
- Collaboration with local governments to ensure that docks are subject to building permits and inspections. This is not currently the case throughout coastal Georgia, and a lack of enforceable building standards and oversight during construction makes docks less safe and resilient to storms.

Georgia Conservancy is particularly concerned with the significantly expanded maximum dock dimensions allowed by these new rules, which were not supported by the majority of the CRD Dock Committee. Specifically, these proposed rules allow a more than **100% increase** in the maximum allowable footprint of the boardwalk over the marsh, expanding from a limit of 3,000 sq. ft. to 6,600 sq. ft. This represents more than a doubling of shading impacts despite the known science, commissioned by DNR, which demonstrated that shading of marsh grass by dock walkways directly reduces marsh productivity. This new maximum footprint is more than 50% larger than South Carolina's maximum dock square footage of 4,000 sq. ft. Among our peer states, South Carolina's low coastline and marsh conditions are most similar to Georgia's, so why would Georgia marsh front property owners require docks so much larger than those in South Carolina?

Most notably, there are no provisions for dock owners to demonstrate a reasonable need for larger docks or to mitigate this additional impact on the marsh, even though this new standard will allow docks to **impact well over 0.1 acres of marsh by right**. This exceeds the 1/10th acre threshold that the U.S. Army Corps of Engineers (USACE) uses to trigger compensatory mitigation requirements for jurisdictional wetland impacts. If this level of impact is significant for freshwater wetlands, then why would the same not be true for salt marshes?

Significant expansion of the size of private docks allowed over our marshlands is not a way to "facilitate reasonable access" to the public. It does, however, provide an expanded private right to certain marsh front landowners despite the impact (known and potential) to our coastal marshlands held in public trust. As DNR deliberates the proposed Rules, Georgia Conservancy encourages the Board to consider the following:

- **Marsh front ≠ Waterfront:** Owning property on the marsh does not guarantee a right to build a dock to access deep water. That access is a privilege, not a right, as the marshland the dock crosses belongs to the people of Georgia and is held in trust by the State of Georgia.

- **Public Trust and Water Access:** Outside of historic King's grants, no private individual owns the marsh. It is public land held in trust, and any encroachment on it must be carefully considered.
- **Water-Dependent Use Only:** Docks should exist only to support water-dependent activities, such as boating or fishing – not outdoor living space – and should be sized accordingly.
- **Viewshed and Aesthetic Impacts:** The spread of oversized or “party docks” disrupts the scenic beauty that draws people to the coast and can negatively affect neighbors’ quality of life and viewshed.
- **Habitat Fragmentation:** Docks can erode the integrity of the marsh ecosystem. Unbroken stretches of marshland provide exponentially greater habitat value than areas divided by expansive boardwalks, walkways, and platforms.
- **Marine Debris and Structural Resilience:** As storms become more frequent and severe, poorly built or maintained docks become marine debris littering our marshes. Limiting dock sizes and ensuring that responsible contractors build to acceptable standards are the most effective ways to limit future impacts to the marsh from dock debris.

We Must Protect What We Love: Our marshes are vast, healthy, and beautiful because of decades of protection by DNR, not because they were left to chance. If we relax the standards now, we risk undermining the very thing that makes our coast so special.

We encourage DNR to maintain the current policy limiting dock size and adopt stronger regulations governing their construction and maintenance. These protections are necessary to preserve the ecological, scenic, and public value of our coastal marshlands now and for future generations.

We appreciate the efforts of the Board of Natural Resources and CRD in seeking input on this important topic, allowing Georgia Conservancy to participate in the Private Recreational Dock Stakeholder Committee, and considering our comments and concerns on the proposed Rules.

Sincerely,



Courtney Reich
Coastal Director



Katherine Moore
President

Patrick, Diana

From: Donald Carson <civinput@newmode.io>
Sent: Tuesday, July 14, 2026 11:58 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Donald Carson





House of Representatives

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SPECIAL COMMITTEE ON HEALTHCARE

July 15, 2026

Jill Andrews
Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

Dear Ms. Andrews:

I refer to the public notice dated June 24, 2026, titled *Notice of Proposed Regulation Change: Proposed Amendments to Rules for Private Docks over State-Owned Tidal Water Bottoms, Rules 391-2-1.01-.09, Creating Rule 391-2-1.09*, soliciting comments on the proposed rule.

As a representative of the people of coastal Georgia, I have received numerous contacts in this matter. Accordingly, I consider it my duty to respond to the above noted proposed rules for private docks. Let me begin by saying that I fully support real black and white rules which will provide the people with full transparency on their riparian rights. In my experience, heretofore, there have been too many areas left to interpretation which creates uncertainty for property owners. So, I support new rules and I generally support most of these proposed amendments. However, there are several areas of concern that I believe will be harmful to my constituents in coastal Georgia that must be addressed in advance of passage. My objections follow below.

391-2-1.02 Definitions

(20) *Private dock means a structure built onto or over state owned tidal water bottoms that is used for recreational fishing and other water-dependent recreational activities, ...*

Comment: This definition seems too restrictive especially since many of our fisherman, shrimpers, crabbers, and oyster farmers may well use their own personal docks to some degree even if they are not their formal commercial site. Increasingly, on the Georgia Coast there are fewer spaces for our commercial fisherman to dock. This definition is too restrictive.

391-2-1.03. Issuance of a Revocable License

(1) *Applicants for a revocable license must submit to the department a complete application for the construction, reconstruction, modification, and maintenance of a private dock, ...*

Comment: It is unreasonable to burden property owners with a required new application to simply maintain their currently permitted dock. Remove the word “maintenance.” Maintenance activities to include replacing pilings are routine and should not necessitate a new license.

391-2-1-.04

(4) One fixed walkway, up to 1,000 linear feet in length and up to six feet wide, ...

Comment: This 1,000-foot rule is arbitrary and lacks any scientific foundation. Moreover, current aerial imagery suggests that today, with all of the 3,453 private docks on the Georgia Coast, this equates to only 0.025% of marshland with an elevated walkway. This is insignificant. The most limiting factor in walkway length is pure economics. It simply costs too much.

391-2-1-.06. Maintenance of Existing Private Docks

Licensees must maintain private docks within their existing footprint. Before starting any maintenance, the licensee must notify the department ...

Comment: Again, this is an unreasonable burden on property owners by requiring an owner to notify the department for simply maintaining their already permitted dock. Moreover, it encourages the public to ignore and disobey the rules because it is a ridiculous requirement. For example, imagine a property owner trying to contact CRD over a holiday weekend when they want to replace rotten boards.

391-2-1-.09. Inspections; Penalties

(4) Any person violating any provision of Subject 391-2-1 shall be guilty of a misdemeanor...

Comment: It would appear that this section would subject a dock builder to a misdemeanor crime for failing to build precisely to a “scaled drawing” that was not required to be drafted with precision by an architect or surveyor.

Representative Jesse Petrea

HD 166

Patrick, Diana

From: Meaghan Walsh Gerard <civicinput@newmode.io>
Sent: Thursday, July 16, 2026 3:35 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Andrews,

I support CRD's efforts to codify dock standards for Georgia's coast but encourage stronger limits on the size and footprint of private docks.

This proposal allows docks to exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act.

This would also allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway. 6,000 sq. feet is entirely too big and unnecessary. Golf carts don't need to be on docks. That means your dock is too long to begin with.
- Incorporate a public process allowing nearby property owners to comment on docks that might impact their viewshed or marsh experience. A neighbor shouldn't be allowed to increase their property value by directly negating someone else's.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

State-owned marshlands are precious. We all need to protect them from anything that will have lasting impacts on our shared coastal landscape.

Thank you for considering my comments,
Meaghan Walsh Gerard



Patrick, Diana

From: Ann Fuller [REDACTED]
Sent: Thursday, July 16, 2026 4:51 PM
To: Comments, CRD
Subject: Draft Dock permitting - written concerns from Georgian

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.

Ms. Jill Andrews and DNR / CRD Representatives:

I am writing as a concerned individual and lifelong Georgian to express my grave concerns over DNR's current draft language that would expand upon the footprint allowed for private docks in our state.

Until the Georgia Conservancy notified me of DNR's intention of expanding allowable dock sizes, I had assumed DNR was interested in protecting our marshlands through improved protections and smaller footprints in dock permitting.

It is therefore very disturbing and disappointing to learn the opposite seems to be true... DNR seems intent on allowing greater damage to the marshlands that most coastal Georgians like myself value greatly. Furthermore I know DNR is aware that these marshlands are critical for the survival of all marsh creatures and our larger ecosystem.

I would also like to echo the concerns of the Georgia Conservancy as follows:

DNR / CRD's proposed rules allow a more than **100% increase** in the maximum allowable footprint of the boardwalk over the marsh, expanding from a limit of 3,000 sq. ft. to 6,600 sq. ft. This represents more than a doubling of shading impacts despite the known science, commissioned by DNR, which demonstrated that shading of marsh grass by dock walkways directly reduces marsh productivity. This new maximum footprint is more than 50% larger than South Carolina's maximum dock square footage of 4,000 sq. ft. Among our peer states, South Carolina's low coastline and marsh conditions are most similar to Georgia's, so why would Georgia marsh front property owners require docks so much larger than those in South Carolina?

Most notably, there are no provisions for dock owners to demonstrate a reasonable need for larger docks or to mitigate this additional impact on the marsh, even though this new standard will allow docks to **impact well over 0.1 acres of marsh by right**. This exceeds the 1/10th acre threshold that the U.S. Army Corps of Engineers (USACE) uses to trigger compensatory mitigation requirements for jurisdictional wetland impacts. If this level of impact is significant for freshwater wetlands, then why would the same not be true for salt marshes?

Significant expansion of the size of private docks allowed over our marshlands is not a way to "facilitate reasonable access" to the public. It does, however, provide an expanded private right to certain marsh front landowners despite the impact (known and potential) to our coastal marshlands held in public trust.

The spread of oversized or “party docks” disrupts the scenic beauty that draws people to the coast and can negatively affect neighbors’ quality of life and viewshed.

Docks should exist only to support water-dependent activities, such as boating or fishing – not outdoor living space – and should be sized accordingly. The spread of oversized or “party docks” disrupts the scenic beauty that draws people to the coast and can negatively affect neighbors’ quality of life and viewshed.

Thank you for taking my comments.

Sincerely,
Ann O’Brien Fuller

A black rectangular redaction box covering the signature area.

Patrick, Diana

From: Rachel Green <civicinput@newmode.io>
Sent: Thursday, July 16, 2026 7:58 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

I am writing about the new rule establishing standards for private recreational docks. I support CRD's efforts to establish dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule allows dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape. Georgia's wetlands are a resource for everyone and shouldn't be divided up by oversized docks.

Thank you for considering my comments,
Rachel Green

Patrick, Diana

From: Alice Dunick <civiciinput@newmode.io>
Sent: Thursday, July 16, 2026 9:55 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,

Alice Dunick

Patrick, Diana

From: William Brown <civicinput@newmode.io>
Sent: Friday, July 17, 2026 4:07 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
William Brown



Patrick, Diana

From: Erin Geet <civicinput@newmode.io>
Sent: Friday, July 17, 2026 6:50 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Erin Geet



Patrick, Diana

From: Mary Osborne <civiciinput@newmode.io>
Sent: Friday, July 17, 2026 7:22 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

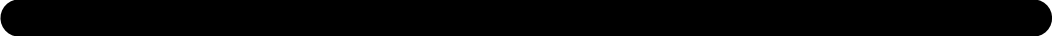
The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Mary Osborne



Patrick, Diana

From: Patricia McMillan <civiciinput@newmode.io>
Sent: Friday, July 17, 2026 8:32 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms.

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Patricia McMillan



Patrick, Diana

From: Sue Stephenson [REDACTED]
Sent: Friday, July 17, 2026 3:36 PM
To: Comments, CRD
Cc: Joan Salvati; Ruth Goldstein
Subject: Private Dock Permitting Rules - Letter of Concern from The Abigails
Attachments: FINAL Abigails Dock Letter to DNR 6.29.26.pdf

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.

To: Jill Andrews, Coastal Resources Division, Department of Natural Resources

Good afternoon Ms. Andrews,

Please find attached a letter I have written on behalf of the Board of Directors of The Abigails, expressing our concerns about potential changes to private dock permitting rules.

Please let me know if you have any questions.

My very best wishes,

Sue

Sue Stephenson
President, The Abigails
[REDACTED]



July 14, 2026

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520
Email: crd.comments@dnr.ga.gov

Dear Ms. Andrews:

I am writing on behalf of the Board of Directors of [The Abigails](#) to express concerns about the potential changes to private dock permitting rules. We are a 501(c)(7) organization of women committed to justice, equal rights and opportunity, and fair treatment for all. The Abigails Board of Directors represents more than 360 members living in Savannah and throughout Chatham County.

We are concerned that allowing longer and wider private docks will increase marsh fragmentation and diminish the ecological integrity of Georgia's coastal marshes. These marshes play a critical role in protecting coastal communities by reducing wave action, absorbing floodwaters, improving water quality, and providing essential habitat and nursery grounds for countless fish, bird, and wildlife species. **We respectfully ask the Department of Natural Resources (DNR) to maintain the current permitting standards, which allow docks of up to 1,000 linear feet if three feet wide, or 500 linear feet if six feet wide, with a maximum total area of 3,000 square feet.** While we understand that some property owners have raised safety concerns and would like wider docks to accommodate golf cart access, we believe the long-term environmental benefits of preserving existing limits outweigh the need for expanded private dock structures.

We also encourage the DNR to prioritize community docks over individual private docks within newly developing waterfront communities. Community dock models help preserve larger stretches of uninterrupted marsh while still providing residents with access to coastal waterways.

Many of our members live in The Landings, a private coastal community spanning 4,200 acres of preserved maritime forest and waterways. Through intentional planning, the community relies on shared access through two community marinas—Delegal Marina and Landings Harbor Marina—rather than private docks. These facilities provide kayak launches, resident kayak storage, wet and dry boat slips, and gathering spaces for community events. As a result, residents enjoy expansive views of unspoiled marshland and access to peaceful, undisturbed natural areas. **The preservation of these views is a direct result of protecting the marsh ecosystem from excessive development and fragmentation.**

We encourage the DNR to continue policies that protect the integrity of Georgia's marshes and promote responsible waterfront access that balances recreation with environmental stewardship.

Thank you for considering our comments on this important matter.

Sincerely,

Sue Stephenson
President, The Abigails

Patrick, Diana

From: Joan Salvati <[REDACTED]>
Sent: Friday, July 17, 2026 3:57 PM
To: Sue Stephenson
Cc: Comments, CRD; Ruth Goldstein
Subject: Re: Private Dock Permitting Rules - Letter of Concern from The Abigails

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.

Thanks for getting this out Sue!

On Fri, Jul 17, 2026 at 3:35 PM Sue Stephenson <[REDACTED]> wrote:
To: Jill Andrews, Coastal Resources Division, Department of Natural Resources

Good afternoon Ms. Andrews,

Please find attached a letter I have written on behalf of the Board of Directors of The Abigails, expressing our concerns about potential changes to private dock permitting rules.

Please let me know if you have any questions.

My very best wishes,

Sue

Sue Stephenson
President, The Abigails
[REDACTED]

Patrick, Diana

From: Burnside Island [REDACTED]
Sent: Saturday, July 18, 2026 10:23 AM
To: Comments, CRD; Petrea, Jesse
Cc: Jonathan Webber; Sarah Brawner
Subject: Proposed DNR Changes - Questions and Comments

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.

Hello.

On Thursday, June 18, an email was sent requesting a representative of DNR to attend the Burnside Island Neighborhood Association meeting to answer questions regarding proposed changes. Officers also attempted to contact the office by phone calls, with no response.

The following questions and comments have been summarized from residents of our neighborhood. We would appreciate consideration to the comments and responses.

Thank you.

Janel Janiczek Smith
Secretary, Burnside Island Neighborhood Association

Questions:

What happens to an issued permit that has been approved, but construction has not begun and the permit is not consistent with the proposed new rules? It is my understanding that permits are issued and that there are 3 years to build. The time period may need to be addressed.

Will there be someone who monitors and checks for violations once permits are issued and construction begins? It is important that these are addressed as they are being done not after completion.

How is a new dock addressed according to the docks on either side of the current homeowners? Possibly, new construction should require a water survey by the dock builder to make sure distances are accurate according to property lines.

Regarding 391-3-1-08, General Conditions of Revocable Licenses for Private Docks, this needs far more explanation on the process. And, how are all rules and violations monitored and enforced?

Comments:

For many years, the coastal resource division was delegated the authority to issue permits for the construction of private residential docks by the United States Army Corps of Engineers. Having the ability to obtain a permit from a single source made it much easier for the people of Georgia to obtain a permit to construct a dock. Their proposed rule change indicates that the United States Army Corps of Engineers did not renew the authority delegated to the coastal resource division in 2022, and is now requiring a separate permit to be approved by them. The duplication of effort makes it more onerous on the citizens and will result in no tangible benefit.

Rules and regulations should not be created by agencies within the government, but rather agencies should submit proposed rules and regulations to the legislature, and the legislature is the one that should establish the rules and regulations that govern the citizens of Georgia.

Owners of waterfront property with private residential docks have a responsibility to maintain those docks. It is especially important to maintain them to ensure the adequacy of their use with regard to being safe. One of the most common repairs made to docks is piling replacement as wood-boring organisms deteriorate them, which necessitates their routine periodic replacement. Something as common as replacing deteriorated piling to keep a dock structurally sound should not require obtaining a permit from either the US Army Corps of Engineers or the Coastal Resource Division. This effort places an unnecessary burden on federal and state agencies as well as individuals at a time when all have limited resources.

I believe that the more onerous they make it to perform simple repairs to docks will also have negative consequences. Instead of being proactive at replacing dock pilings and performing minor maintenance, I fear that many will put off the repairs until absolutely necessary, which will result in increased piling failures with all the permitting being required. A simple fix would be to consider piling replacement under the type of maintenance that does not require a permit.

Patrick, Diana

From: James Rehlaender [REDACTED] >
Sent: Saturday, July 18, 2026 2:56 PM
To: Comments, CRD
Subject: Objection to Coastal Georgia Dock Rule Proposed Changes

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.

I have the following comments regarding the proposed changes to the Dock Rule as well as my broader concerns about the dock/boathouse construction in general affecting the marsh area around Sea Island - and all other marsh areas that are similarly affected:

Environmental Impact.

As owners of property on the Sea Island marsh since 2007, we have been disappointed to see the proliferation of docks that obscure the views of the waterway surrounding our island and the disappearance of wildlife like bald eagles disturbed by the sudden change in habitat. When we bought the house, we were under the impression that the marsh area is a public resource and as such, protected by the Coastal Marshlands Protection Act - which is obviously not the case. I am surprised that a homeowner can build a long walkway of hundreds of feet to get to the water and build a boathouse with one or two boat docks - over public land. This seems to me to be tantamount to a private taking of public lands. While I understand that the docks and long walkways are subject to a revocable permit, I am confident that once built, they are essentially permanent fixtures.

Expansion of Dock Area

I also understand that the new dock rules would allow for a doubling of dock/walkway area and this is absurd - the previous standard of 3,000sf was already excessive. Based on our experience over the past 15 years, rules about docks seem to not be enforced anyway, but your attempt to codify them is admirable - assume that some measure of enforcement and monitoring will be part of this effort. Note that many of the docks are already so long that the owners used golfcarts and e-bikes to make the long trip to the boathouse - thought this was not permitted and seems a bit dangerous to me.

Property Value Impact

It does seem that the government has ignored an important issue here in that the property owners who build a dock experience an immediate and sizeable increase in property value while those whose views have been negatively affected by the boathouses in particular potentially experience declines in value - and the government receives no significant benefit for effectively transferring public property to private homeowners. Also surprised that the Federal government doesn't have an interest in these transactions as it certainly would in the case of property along the beachfront here.

Summary

I hope that you will reconsider your proposed private dock rule changes in the context of the effect on the environment and property rights for those not able or interested in building a dock and boathouse. I should also note that the docks are rarely used by the homeowners and a solution here could be to allow broader access by other residents.

Jim Rehlaender

Patrick, Diana

From: Davis Poole [REDACTED]
Sent: Monday, July 20, 2026 4:43 PM
To: Comments, CRD
Subject: Private Dock Rules Public Comment
Attachments: Poole_DNR_Dock_Rules_Comments_7.22.26.pdf

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.

Jill and team,
Attached is my public comment for the proposed private dock rules.
As always, feel free to reach out if you have any questions,
Davis

Davis Poole
[REDACTED]
[REDACTED]
[REDACTED]

"It's a sweet life living by the salty sea."

— Jimmy Buffett

Celebrating Georgia's marshes, tides, and barrier islands.

To: crd.comments@dnr.ga.gov

Comments on Proposed GA DNR Rules & Regulations for Private Docks

From: Davis Poole

McIntosh County Commissioner; Member, Marsh and Shore Protection Committee; Coastal Resident;
Private Recreational Docks Rulemaking Stakeholder Committee member

DNR Team,

Thank you for your continued effort to formulate rules for private docks in state-owned tidal waters. This work is long overdue, and when complete it will give both citizens and staff much-needed guidance.

I appreciate the opportunity to serve on the stakeholder committees. The fundamental question I recall asking early in the process was how much impact docks have on Georgia's coastal environment today including the number of docks, the length of each dock and so forth. At the time, that information had not been studied and was not available. I believe an answer to that question would have steered this process in a very different direction. Now that a study has been conducted — and it shows the impacts are de minimis — some of my views on the proposed rules have changed from the feedback I gave during the committee process.

The GIS study conducted by Resource and Land Consultants found that existing docks represent a very small impact on Georgia's marshes: 0.025%, or less than three-hundredths of one percent. The study also modeled a worst-case scenario in which a large dock (6' wide x 500' long) was built on every parcel eligible for a dock — an additional 8,734 docks, at a length two and a half times the current average. Even then, the total impact would be only 0.228%, less than one quarter of one percent of Georgia's marsh. Stated differently, 99.77% of Georgia's marshland would remain free of dock structures even at maximum buildout.

Dr. Clark Alexander's shading study adds further perspective. He found that shading beneath docks reduced *Spartina alterniflora* (smooth cordgrass, the dominant marsh grass) stem density by roughly 50% compared to adjacent unshaded marsh, translating to a 21–37% reduction in carbon production under the shaded footprint. Since the impact within a dock's footprint is a reduction in density rather than a total loss, the effective impact is even smaller than the coverage figures above suggest.

With that data as context, my comments on the proposed rules are as follows:

391-2-1-.04 — Standards and Conditions of New Private Docks

Width of dock (up to 6'): Acknowledged; I understand this change has already been presented and will support the Outdoors Beyond Barriers program the DNR implemented a few years back.

391-2-1-.04(4) — Length of dock: I recommend no maximum length requirement. Given the data above, even doubling the overall coverage across all existing and potential buildable lots would still result in an impact of less than one quarter of one percent of Georgia's marsh. Had this information been available

to the stakeholder committee before this process began, I firmly believe the preliminary outcome would have been very different. As a practical matter, the cost of building a longer dock will naturally discourage excessive length

391-2-1-.04(2) — “A private dock must terminate at the first waterway measuring 20’ wide or greater at MHW”: I recommend striking this provision entirely in favor of case-by-case review. There are many examples along our coast where tidal creeks and streams form reticulated networks that terminate inside large bodies of marsh unlikely to ever see human activity. Allowing a dock to cross a 20’ stream and extend another 50-100’ to reach deep water would let a riparian landowner meaningfully access the resource.

391-2-1-.04(5) — Dock configurations: This should also be reviewed on a case-by-case basis. In addition to L and T shapes, U shapes should be considered, as some existing docks have been built in that configuration based on property layout. The purpose of these rules should be to allow reasonable access to the resource.

391-2-1-.04(12) — Local permitting: I recommend that the DNR collaborate with all coastal counties to issue dock permits along with electrical permits. Counties could establish or update fees to cover their expenses while assisting the DNR in ensuring that dock design and construction comply with the revocable license. This would close the loop for staff giving closure to the dock build.

391-2-1-.05 — Reconstruction and Modification of Existing Private Docks, and 391-2-1-.06 — Maintenance of Existing Private Docks

In my opinion, no existing dock in Georgia should be required to obtain a new revocable license for reconstruction within the same footprint or for maintenance, since maintenance is already required under 391-2-1-.08(2). Some docks have been in existence for decades — in our county, for generations. A revocable license should not be required simply because the DNR does not have a copy of prior permitting from other agencies such as the Army Corps of Engineers. If a dock needs a few pilings replaced — whether in the fixed walkway, the fixed deck, or the floating dock — the owner should not have to apply for a revocable license. As noted, maintenance is already a requirement.

391-2-1-.07 — Variances

I applaud staff for developing a variance process. This demonstrates the willingness to work towards solutions.

391-2-1-.08(12)

I agree that an applicant should provide notice ten days prior to construction of a new dock. However, as stated above, I believe no revocable license should be required for reconstruction or maintenance.

391-2-1-.09

Regarding 391-2-1-.09(1), the phrase “without prior notice” is simply unnecessary. As I noted at the DNR Board meeting, the only personnel within the Department of Natural Resources authorized to enter private land without a search warrant or notice are DNR Game Wardens and law enforcement. Language of this kind has generated considerable controversy recently and reads as overreach.

The DNR has spent many years — with help from public officials like myself — softening the approach of previous administrations toward the public. We should remember that “state-owned lands” are not the government’s lands; they are the People’s lands. The DNR serves as their steward on the coast, and in my opinion, we must strike a balance between protection measures and common-sense use and enjoyment. After all, the CRD’s own mission statement says it plainly: “To balance coastal development and protection of the coast’s natural assets.”

One Final Recommendation

I continue to believe the DNR CRD should conduct a half-day class for Georgia dock builder’s certification. Charge for it if necessary — but put in their hands the best-practices document that Jason Ball volunteered to build at no cost, one that prescribes the fundamentals of dock construction or standards. General contractors don’t build docks; specialized dock builders do. While their techniques may vary, a certification class would ensure they have written guidance and, at the same time, teach them how to work responsibly within the marsh environment. This would not need to be a weekly or even monthly event — we simply don’t have that many builders.

Thank you for your continued efforts and consideration of my comments,

Davis

Davis Poole

“It’s a sweet life living by the salty sea.”

— Jimmy Buffett

Celebrating Georgia’s marshes, tides, and barrier islands.

Patrick, Diana

From: Jennifer Fletcher <civinput@newmode.io>
Sent: Monday, July 20, 2026 6:19 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Jennifer Fletcher



Patrick, Diana

From: Rick Basinger [REDACTED]
Sent: Tuesday, July 21, 2026 12:23 PM
To: Comments, CRD

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.

Thank you for the opportunity to comment on proposed private dock rules changes. It is in the best interests of the state and citizens to formulate rules for private docks. My experience has been positive when working with DNR. However, standards have not been regulated or managed across the board. As to proposed changes: As to width of dock, I concur with 6 ft. Width. As to length of dock, review on a case by case basis with no limits. Deleted/strike the provision for crossing waterways 20ft or wider. Approve case by case as to allow landowners access to the resource.

Train dock builders with annual workshops to avoid issues with adjacent landowners. Allow various dock shapes depending upon location. Allow DNR to work with counties on permits, electrical and other. Continue to review variance applications with a balanced approach. Maintenance is required in our revocable license. Do not add on a new license for repairs or maintenance. This would reduce significant workload on the department and is considered to be an overreach requirement.

Respectfully submitted,
Rick Basinger

Patrick, Diana

From: Dan Bucey <dbucey@rlandc.com>
Sent: Tuesday, July 21, 2026 12:48 PM
To: Comments, CRD
Cc: Alton Brown Jr.; Russell Parr
Subject: Proposed Dock Rules
Attachments: RLC_Dock_rule_comment_letter_7_21_26.pdf

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.

Miss Jill;

Attached are comments regarding proposed amendments to Subject 391-2-1 of the Rules of the Department of Natural Resources.

Sincerely,

Daniel Bucey, PRINCIPAL

41 Park of Commerce Way, Suite 101

Savannah GA, 31405

P 912 443 5896 F 912 443 5898 C 912 659 0988

<http://www.rlandc.com>





July 21, 2026

Ms. Jill Andrews
Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way
Brunswick, Georgia 31520

Dear Ms. Andrews:

We refer to the public notice dated June 24, 2026 titled *Notice of Proposed Regulation Change: Proposed Amendments to Rules for Private Docks over State-Owned Tidal Water Bottoms, Rules 391-2-1.01-.09, Creating Rule 391-2-1.09*, soliciting comments on the proposed rule.

Resource & Land Consultants, LLC assists landowners in obtaining authorization to construct docks in tidal waters of Georgia and participated in the Private Recreational Dock Rulemaking Stakeholders Committee. As you may recall, a report issued on behalf of the Stakeholders Committee was published on February 11, 2025. As many members of the Stakeholders Committee felt that the proposed rules required further discussion, subsequent meetings and a line-item vote on relevant issues were subsequently held. The results of the additional meetings were published on July 28, 2025 and referred to as a “minority report” even though the results were the first time that each proposed rule item was actually voted upon and the results of said majority vote contrasted with the original committee report. The rule as currently proposed fails to incorporate many of the findings of the committee that were approved by the majority of the participating members. RLC has received comments from many affected landowners about the proposed rule and we offer the following comments.

391-2-1-.03 Issuance of a Revocable License

(2)(d) Private docks shall access waterways with a defined channel and not ponded areas/mudflats.

Comment: This standard should be stricken. A proposed dock should be evaluated solely on its location in relation to the width of the waterway regardless of whether or not it has defined banks. In waterways that go dry at low tide, the waterway is currently measured from grass-to-grass and a dock proposed on a waterway that lacks defined banks should be evaluated on its location in that waterway that allows navigation around the structure that same as if it were located on a waterway with defined banks. There are many riparian lots that front on areas that would fall under the definition of “ponded areas or mudflats”. While there may not be a defined channel, landowners that front such waterways could benefit from construction of a typical dock subject to applicable length, location, and size requirements. Such a dock would still be utilized for water-dependent activities, and the environmental effect of such a dock would be no different from a dock situated on a defined channel that has little or no water for some portion of the tidal cycle. The applicant would simply have to manage their ingress/egress to the structure around the tides and could utilize the dock for fishing and crabbing even at times when navigating shallower water may not be possible.

391-2-1-.04 Standards and Conditions of New Private Docks

(2) A private dock must terminate at the first waterway measuring 20 feet wide or greater at MHW. A waterway that is less than 20 feet wide at MHW may be spanned by a fixed walkway, provided no pilings

are placed in the waterway and the bottom of the span is at least six feet above MHW, or higher as determined by the department to be necessary for safe navigation.

Comment: This standard is overly restrictive and should be stricken from the rule. There are many riparian lots that could otherwise have access to a waterway that would afford deep water access and a full-size dock for water-dependent activities. Adhering to this proposed standard would require a lot owner to construct a minimally functional crabbing or fishing pier on a waterway that would likely offer little to no vessel access to tidal waters. Additionally, small tributaries lacking sufficient volume and velocity of tidal flows are prone to accumulation of silt and thus are more likely to be less viable for a dock of any type and could result in future costly modifications or removal of the structure.

(4) One fixed walkway, up to 1,000 linear feet in length and up to six feet wide, may provide access from the upland, and must be built at a height to clear all vegetation, but not more than six feet above MHW. Handrails and supports must be illustrated on scaled drawings. No walkway extensions are permissible on new private docks.

Comment: The width of the walkway should not be inclusive of any railings or curbs. Additionally, the length of the walkway should not be subject to a maximum length and should be evaluated on a case-by-case basis for the following reasons:

1. Based GIS analysis of current aerial imagery, an estimated 3,453 private docks currently exist in coastal Georgia. Assuming all existing docks contain a 6-foot-wide walkway, only 0.025% of Georgia's coastal marshlands contains elevated walkways. The environmental effect resulting from this footprint would be less than minimal by any standards.
2. Avoidance and minimization efforts have been incorporated into modern day dock designs within Georgia. Unlike placement of fill associated with causeways which have been constructed in the past to provide access to the deck and floating dock, elevated walkways over vegetated marshlands do not result in a loss but merely have minor shading effects of tidal vegetation. The amount of effect is minimal both singularly and cumulatively as demonstrated by multiple studies evaluating the effects of private docks on the over 368,000 acres of marsh. Some assessments suggest that as much as 85 percent of marsh function is maintained underneath elevated walkways.
3. For docks over 1,000' in length, there are alternative construction methods that can minimize effects on tidal marsh including requirement for alternative light-penetrating decking materials, extended piling spacing, and increased height above the marsh vegetation.
4. Geographic considerations and cost of constructing and maintaining docks alone currently limit the number and length of docks on the coast of Georgia. This is demonstrated by the number of existing docks that have been constructed since 1733.

Given the less-than-minimal effects associated with modern dock construction, available alternative construction methods minimizing any such effects and the high costs associated with docks that would exceed the proposed maximum lengths and thus limit the universe of additional docks, a maximum walkway length limitation is not justified, nor necessary for the adequate protection of coastal resources.

(6) A private dock to a waterway 20 feet wide or greater may have a fixed deck with a maximum area of 400 square feet, including gangway landings and cantilevered components, and may not be located over vegetation. Fixed deck(s) may be roofed per Rule 391 2-1-.04 (11) and partially enclosed where the lower three feet consists of a single layer of woven screen wire or wainscot and the upper section is open or finished in woven screen wire.

Comment: Small (6' x 6' or smaller) gangway landings sometimes necessary for practical location of the gangway access to a floating dock should not be included in the 400 ft² maximum allowed fixed deck. These features are located over unvegetated areas and do not result in a negative impact to tidal waters.

(8) Floating docks should be pile supported, shall not rest on the water bottom at MLW or must be cradled and must not be located over vegetation. Gangways accessing a floating dock(s) do not count toward the maximum area but must be indicated on the scaled drawing.

(a) Single family dock: The maximum area of a floating dock(s) is 600 square feet.

Comment: A variance for floating docks to exceed 600 ft² in size should be included for applicants with larger singular vessels and/or applicants with multiple vessels.

(12) Utilities to be extended to the private dock, including electrical and water, must be described in the application. Applicant must provide proof of application for a local electrical permit before a revocable license is issued.

Comment: In lieu of providing proof of application for a local electrical permit prior to obtaining a revocable license, it would be more practical to condition the license to require obtaining an electrical permit prior to operation of the dock. It may prove to be difficult in some localities to obtain an electrical permit based upon the minimum required hand-drawn scaled drawings which could lead to lengthy delays in obtaining authorization for the dock itself and lead to extended scheduling difficulties with dock contractors.

391-2-1-.06 Maintenance of Existing Private Docks

Licensees must maintain private docks within their existing footprint. Before starting any maintenance, the licensee must notify the department to determine serviceability and requirements for a new revocable license. If the department deems the private dock or its parts are unserviceable, it cannot be maintained; however, it may be reconstructed or modified according to Rule 391-2-1-.05.

(2) Maintenance activities involving the use of heavy machinery, a barge, or a crane, or that involve the installation or replacement of pilings, will require a new revocable license.

Comment: Replacement of pilings is a very common and routine maintenance activity and should not require a new revocable license.

391-2-1-.07 Variances

(1) The department may grant a variance allowing the length of the fixed walkway on a new private dock to exceed 1,000 feet for the sole purpose of accessing the waterway nearest to the upland. Such walkway exceedance shall not exceed ten percent of the standard allowable length (i.e., 100 feet) and must constitute the shortest route to the waterway, as determined by the department.

Comment: The length of the walkway should not be subject to a maximum length and should be evaluated on a case-by-case basis. For docks over 1,000' in length, there are alternative construction methods that can minimize effects on tidal marsh including requirement for alternative light-penetrating decking materials, extended piling spacing, and increased height above the marsh vegetation. Walkways over vegetated marshlands do not result in a loss but merely have minor shading effects of tidal vegetation. The amount of effect is minimal both singularly and cumulatively as multiple studies have demonstrated. Considering the less than minimal effects associated with dock construction, alternative construction methods and cost limitations imposing a maximum walkway length is not justified when considering the overall environmental impacts.

Comment: Additionally, a variance for larger floating docks should be added based upon demonstrated need such as larger vessels or multiple vessels owned by an applicant.

391-2-1-.09 Inspections; Revocation, Suspension or Modification of Revocable License; Penalties

(1) Private docks are subject to compliance inspections by department staff without prior notice. An as-built post-construction survey may be required; such survey shall comply with the Georgia Plat Act, O.C.G.A. §15-6-67 et seq.

Comment: Compliance inspections should be conducted only after notification to the landowner.

RLC supports the promulgation of rules to bring certainty and consistency to the licensing of docks in state-owned tidal waterbottoms. By incorporating the above cited comments into the final rule, we feel that the interests of the regulated public will be fairly served without jeopardizing the protection of coastal marshlands.

Sincerely,



Alton Brown, Jr.
Senior Principal
Resource & Land Consultants



Daniel Bucey
Senior Principal
Resource & Land Consultants

Patrick, Diana

From: Susan Humphreville <civiciinput@newmode.io>
Sent: Tuesday, July 21, 2026 1:44 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Susan Humphreville



Patrick, Diana

From: Jack Robertson <[REDACTED]>
Sent: Tuesday, July 21, 2026 11:22 PM
To: Comments, CRD
Cc: Jack H Robertson
Subject: Public comments concerning new DNR rules proposed for private recreational docks
Attachments: Jack Robertson DNR Public comments 7-19-26.pdf

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Ms Andrews and entire DNR board please find attached for the record a letter with my public comments concerning private and multi family residential dock rules that are currently being considered. Should for some reason this attachment does not come through properly to you , please let me know.

Sincerely, Jack

Jack Robertson
President Robertson Construction Co. Inc.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

July 19, 2026

Ms. Jill Andrews

Georgia Department of Natural Resources

Coastal Resources Division

One Conservation Way

Brunswick, Georgia 31520

crd.comments@dnr.ga.gov

**Re: Notice of Proposed Regulation Change: Proposed
Amendments to Rules for Private Docks over State-Owned
Tidal Water Bottoms, Rules 391-2-1-.01 through 391-2-1-.08,
Creating Rule 391-2 -1.09.**

Dear Ms. Andrews and the DNR Board:

Please accept these comments in response to the above-noted proposed rule. My name is Jack Robertson and I am a resident of Skidaway Island in Chatham County. I built a shared dock in 1996 with the advice of the Army Corps of Engineers and recorded a Dock Agreement in the property records. The dock agreement, executed by my neighbor and me, provided that either party could sell its interest in the dock structure to the other converting the dock to a single-family dock. My neighbor sold his property in 2020 and we followed the procedures of the dock agreement and the advice provided by the Army Corps of Engineers. I bought his interest and a quit claim deed for the dock was recorded in the public records. My new neighbors, aware of the dock agreement and quit claim deed before they purchased the property, applied to DNR to build their own dock, which would need to be roughly as long as mine, 1,170 feet.

Last year, the agency revoked the license issued for my dock, not allowing either property to have a dock, under the premise that the dock was not properly reclassified from a dual family dock to a single-family dock. Put simply, I made a paperwork error, and when I realized it, I asked that my dock be reclassified and offered to move my floating dock to ensure my new neighbor has room for their own dock. Open records requests revealed that the agency converted dual family docks to single family docks on

numerous occasions. Why not mine? I was never given a reason and when I asked to appeal the revocation decision, I was told that there is no appeal process. CRD's word is final.

Because DNR does not have any rules and regulations regarding private dock licensing, it is the state's position that it can revoke a private dock license "at any time for any reason." See the excerpts below from the transcript of a hearing in Fulton County Superior Court on my dock license revocation that took place on March 31, 2026. The attorney for the state said that licenses can be revoked for any reason at any time.

4 property. And so, not only was the State well
5 within its authority to revoke the license
6 which, again, is revocable at any time for any
7 reason. But it was a proper and reasonable

This means that if I put a yard sign up advertising for the governor's opponent, DNR could revoke my license and tear my dock out and, as it stands, I am not able to challenge that decision administratively or through the court system.

But the state also says it can revoke a license for no reason at all, simply because they want to, without any judicial or administrative review of the decision.

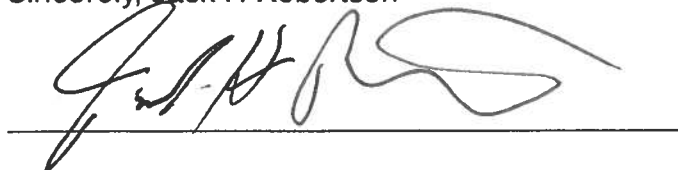
5 This is true even where the licensee
6 incurs expense pursuant to the license. A
7 revocable license is revocable at any time for
8 any or no reason. But it was particularly

Pursuant to the notice I received, revoking a dock license allows DNR to rip out a person's dock, their personal property, "at any time for any reason" "or no reason" without any judicial or administrative review of the decision. And DNR has started the process by installing a chain preventing access to my walkway. It could cost me an investment of over \$500,000.00 in my dock if DNR removes the structure I paid to build and maintain, but I am hopeful that the Court of Appeals will act quickly on my case to protect my personal property. Having a rule in place will hopefully prevent folks from having to take the extreme measures I have through the court system.

While a rule is a good first step to afford administrative and judicial review to aggrieved property owners, it is equally as important that the rule makes sense in its application. The variance, as written, does not make sense. Others have articulated the science, or lack thereof, in support of the arbitrary 1,100-foot limit (with discretionary variance) proposed by the rules. I would ask, if there is no appreciable harm to the environment or navigation, why would DNR say that a property owner who can reach deep water with an 1,100-foot walkway can build a dock, but the neighboring property owner who needs 1,125 feet to reach deep water cannot build a dock? Please consider the suggestions made by the engineers and other members of the stakeholder committee who recognize that building a dock over state-owned marsh effectively enforces the public trust by affording generations access to the state's beautiful natural resources for recreation, fishing, and exploring. The science says docks are not bad and anything that improves access to Georgia's natural resources should not be impeded by an arbitrary and unsupported length limit that forces the agency to pick winners and losers among neighbors.

I appreciate this Board's "limited government" approach to the very important job of regulating private property, industry, and private actors, and I am hopeful you will continue that approach here. I have been an avid sportsman my entire life and have supported DNR's conservation efforts and the work of the Board. Please amend the proposed rule, remove the length cap, and require certain mitigation measures in order to be granted a variance for a longer walkway. Thank you for your time and attention to this important matter

Sincerely, Jack H Robertson

A handwritten signature in dark ink, appearing to read "J. H. Robertson", is written over a horizontal line.

Patrick, Diana

From: Eleanor Cart [REDACTED]
Sent: Wednesday, July 22, 2026 7:46 AM
To: Comments, CRD
Subject: Dock rule changes

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I would like to express my displeasure with the proposed changes to the increased size of private docks. I live with a marsh view and value the bio diversity I see everyday. Our coastal environment is already stressed why endanger it more . We need to protect what we have over golf cart convenience . Eleanor Cart Sent from my iPhone

Patrick, Diana

From: Parkman, Henry >
Sent: Wednesday, July 22, 2026 9:58 AM
To: Comments, CRD
Cc: Diane Parkman
Subject: Comments on proposed new regulations for private recreational docks in Coastal Georgia

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Ms. Andrews:

Please consider my comments below on the proposed new rule establishing standards for private recreational docks.

I am a Georgia citizen and, with my wife, own property in DeKalb County and Chatham County (on Tybee Island). As an owner of property on Tybee Island, I am very interested in protecting the marsh and other resources that make the Georgia coast unique and priceless.

While CRD's effort to codify dock standards for Georgia's coast is commendable, the rules should impose stronger, not weaker, limits on the size and footprint of private docks.

Unfortunately, the draft rule allows private docks to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces too many loopholes that would allow dock owners to exceed the original footprint of their dock during reconstruction and expand existing, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend that CRD incorporate the following points that will strengthen the draft rules:

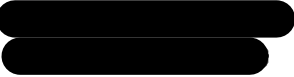
- Return to the 3,000 sq. feet maximum for the dock walkway. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
-
- Incorporate a public process that will allow adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a six-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, I oppose introducing lax requirements for obtaining a license to impact state-owned marshlands will have lasting adverse impacts on our coast.

Thank you for considering these comments.

William Henry Parkman

henryparkman@eversheds-sutherland.com



[Biography](#)

[Eversheds Sutherland](#)

Helping our clients, our people and our communities to thrive

Eversheds Sutherland (US) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com

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Patrick, Diana

From: Ruth Goldstein [REDACTED] >
Sent: Wednesday, July 22, 2026 10:55 AM
To: Sue Stephenson
Cc: Comments, CRD; Joan Salvati
Subject: Re: Private Dock Permitting Rules - Letter of Concern from The Abigails

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Thanks for getting this out, Sue, and for working with me and Joan to start this new type of process for the Abigails!

Ruth

On Fri, Jul 17, 2026 at 3:35 PM Sue Stephenson [REDACTED] wrote:
To: Jill Andrews, Coastal Resources Division, Department of Natural Resources

Good afternoon Ms. Andrews,

Please find attached a letter I have written on behalf of the Board of Directors of The Abigails, expressing our concerns about potential changes to private dock permitting rules.

Please let me know if you have any questions.

My very best wishes,

Sue

Sue Stephenson
President, The Abigails
[REDACTED]

--



Compassionate, supportive private training and group classes for dogs and their people in Savannah, GA.

Ruth Goldstein

[REDACTED]

[REDACTED]

Patrick, Diana

From: Ann Fuller [REDACTED]
Sent: Wednesday, July 22, 2026 11:01 AM
To: Comments, CRD
Subject: Fwd: Draft Dock permitting - written concerns from Georgian

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DNR / CRD Representatives:

I am writing as a concerned individual and lifelong Georgian to express my grave concerns over DNR's current draft language that would expand upon the footprint allowed for private docks in our state.

Until the Georgia Conservancy notified me of DNR's intention of expanding allowable dock sizes, I had assumed DNR was interested in protecting our marshlands through improved protections and smaller footprints in dock permitting.

It is therefore very disturbing and disappointing to learn the opposite seems to be true... DNR seems intent on allowing greater damage to the marshlands that most coastal Georgians like myself value greatly. Furthermore I know DNR is aware that these marshlands are critical for the survival of all marsh creatures and our larger ecosystem.

I would also like to echo the concerns of the Georgia Conservancy as follows:

DNR / CRD's proposed rules allow a more than **100% increase** in the maximum allowable footprint of the boardwalk over the marsh, expanding from a limit of 3,000 sq. ft. to 6,600 sq. ft. This represents more than a doubling of shading impacts despite the known science, commissioned by DNR, which demonstrated that shading of marsh grass by dock walkways directly reduces marsh productivity. This new maximum footprint is more than 50% larger than South Carolina's maximum dock square footage of 4,000 sq. ft. Among our peer states, South Carolina's low coastline and marsh conditions are most similar to Georgia's, so why would Georgia marsh front property owners require docks so much larger than those in South Carolina?

Most notably, there are no provisions for dock owners to demonstrate a reasonable need for larger docks or to mitigate this additional impact on the marsh, even though this new standard will allow docks to **impact well over 0.1 acres of marsh by right**. This exceeds the 1/10th acre threshold that the U.S. Army Corps of Engineers (USACE) uses to trigger compensatory mitigation requirements for jurisdictional wetland impacts. If this level of impact is significant for freshwater wetlands, then why would the same not be true for salt marshes?

Significant expansion of the size of private docks allowed over our marshlands is not a way to "facilitate reasonable access" to the public. It does, however, provide an expanded private right to certain marsh front landowners despite the impact (known and potential) to our coastal marshlands held in public trust.

The spread of oversized or “party docks” disrupts the scenic beauty that draws people to the coast and can negatively affect neighbors’ quality of life and viewshed.

Docks should exist only to support water-dependent activities, such as boating or fishing – not outdoor living space – and should be sized accordingly. The spread of oversized or “party docks” disrupts the scenic beauty that draws people to the coast and can negatively affect neighbors’ quality of life and viewshed.

Thank you for taking my comments.

Sincerely,
Ann O’Brien Fuller

Patrick, Diana

From: J Howell Edwards <civicinput@newmode.io>
Sent: Wednesday, July 22, 2026 11:37 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD take the following actions to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape. This matters to ALL Georgians and has profound ecological implications

Thank you for considering my comments,
J Howell Edwards



Patrick, Diana

From: Lisa Mihan [REDACTED]
Sent: Wednesday, July 22, 2026 11:39 AM
To: Comments, CRD
Subject: Please do not abandon dock rules

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.

Hello, as an owner of a waterfront home, I am appalled by even the thought of reversing the rules for docks. The impact on the marsh health and endangered species is not worth some recreation for a few homeowners. Please do not pass this. There are more people who care about coastal health and species protection than want to build long docks.

Thank you,
Lisa Mihan
[REDACTED]

Patrick, Diana

From: Jim Smith [REDACTED]
Sent: Wednesday, July 22, 2026 3:08 PM
To: Comments, CRD
Subject: New rules for Coastal Private Dock Permitting

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.

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

Ms. Andrews,

I am writing regarding the proposed rules for private docks across public marshland along our coast. I fully support the comments made by Georgia Conservancy, but there are a few items that GC objected to that I want to reemphasize.

1 - The 100% increase in maximum allowed footprint of a boardwalk/deck. This flies in the face of volumes of scientific research on the impact of shade on marsh viability and health. The marsh is PUBLIC LAND, not to be degraded due to the wishes of a few. Building party palaces over a marsh is detrimental to the marsh and its inhabitants and to all neighbors and users of a marshland.

2 - The complete lack of a requirement for structural diagrams, standardization of construction and licensing/certification of companies building docks.

I have assisted in the construction of numerous decks on dry land and knowing the structural issues involved, cannot imagine constructing a deck of just 3,000 sq ft (much less the proposed 6,000 sq ft) without engineering drawings and a licensed General Contractor responsible, at a minimum. The issues with building in the delicate marsh environment are so much more complicated than dry land construction that for DNR to leave construction to anybody with a hammer and a saw blows my mind.

3 - Owning marsh frontage does not and should not equate to a right to a deepwater dock. And any deepwater dock MUST be built to standards proven to survive the coastal storms that are increasing in strength every season. Licensing and inspections are the best way to ensure this quality.

Regards,

Jim Smith
[REDACTED]
[REDACTED]

Patrick, Diana

From: David Alley [REDACTED]
Sent: Wednesday, July 22, 2026 3:43 PM
To: Comments, CRD
Subject: Comment on Private Recreational Docks

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 Ms. Andrews:

As a former resident of Savannah and a native Georgian I am submitting the following comments on the proposed Rules for Private Recreational Docks, issued by the Georgia Department of Natural Resources (DNR) Coastal Resources Division (CRD) on June 24, 2026.

I support CRD's effort to adopt rules to govern the design and construction of Private Recreational Docks, and I appreciate the due diligence that has gone into creating these standards. I applaud DNR's efforts to regulate private recreational docks constructed over public trust tidal waters to ensure safety, consistency, and protection of our coastal marshlands.

However, I am particularly concerned with the significantly expanded maximum dock dimensions allowed by these new rules, which were not supported by the majority of the CRD Dock Committee. Specifically, these proposed rules allow a more than **100% increase** in the maximum allowable footprint of the boardwalk over the marsh, expanding from a limit of 3,000 sq. ft. to 6,600 sq. ft. This represents more than a doubling of shading impacts despite the known science, commissioned by DNR, which demonstrated that shading of marsh grass by dock walkways directly reduces marsh productivity. This new maximum footprint is more than 50% larger than South Carolina's maximum dock square footage of 4,000 sq. ft. Among our peer states, South Carolina's low coastline and marsh conditions are most similar to Georgia's, so why would Georgia marsh front property owners require docks so much larger than those in South Carolina?

I encourage DNR to maintain the current policy limiting dock size and adopt stronger regulations governing their construction and maintenance. These protections are necessary to preserve the ecological, scenic, and public value of our coastal marshlands now and for future generations.

David Alley

Atlanta

--
"All that is true, all that is noble, all that is just and pure, all that is lovable and gracious, whatever is excellent and admirable - fill your thoughts with these things."

Philippians 4:8

Patrick, Diana

From: debra glidden [REDACTED]
Sent: Wednesday, July 22, 2026 3:50 PM
To: Comments, CRD
Subject: Private docks coastal Georgia

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.

Hello,

I am strongly opposed to increasing the size of docks in coastal Georgia as they reduce the biodiversity in the marsh grass and marsh productivity which provides food and critical habitat for many important species. Increased size also negatively affects bird species that depend on intact expanses of saltmarsh, and worsens the neighbors' quality of peace and serenity. If homeowners have enough mobility to get down 1,000 feet of boardwalk and into their boats, then they don't need increased size to allow for golf carts. Let's preserve our precious marsh!

Thank you,
Deby Glidden, [REDACTED]

Patrick, Diana

From: Siri Werner [REDACTED]
Sent: Wednesday, July 22, 2026 4:35 PM
To: Comments, CRD
Subject: New Dock Regulation Proposal

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.

I want to go on record that I oppose the new dock regulation proposal. In addition to the wildlife concerns, if this passes I foresee a bunch of golf carts ending up in the water. Six feet is not wide enough to turn a golf cart around and I'd hate to watch these people try to back their golf cart up 1000 or more feet. (No, this doesn't mean I advocate that the docks be wider than six feet either).

Siri Werner

[REDACTED] Home Owner

Sent from my iPad

Patrick, Diana

From: Margaret Sapp <civicinput@newmode.io>
Sent: Wednesday, July 22, 2026 5:43 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Margaret Sapp

Patrick, Diana

From: Sharen Martin <civiciinput@newmode.io>
Sent: Wednesday, July 22, 2026 6:09 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

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- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Sharen Martin



Patrick, Diana

From: Steve J Smith [REDACTED]
Sent: Wednesday, July 22, 2026 8:11 PM
To: Comments, CRD
Subject: Proposed Dock Regulation/Rule Changes

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.

I feel the proposed rule changes are a solution in search of a problem. The potential negative impact on public marshland far outweighs the benefits to specific landowners. By the way, under the new rules, I believe I could request to build a dock to Dunbar Creek on St Simons Island, since my property extends to the marsh adjoining said creek.

I have no interest in building such a dock, because I do not wish to create an eyesore and potentially harmful structure to the marsh.

There are many options available to property owners in order to reach the end of their docks. To imply that golf carts are the only means of ingress and egress is misleading. Those with mobility issues are most likely already using electric scooters (e.g. Rascals), and with the onslaught of new electric vehicles being introduced daily, even more options are either now available or soon will be.

We know once new rules are approved, any effort to restrict the rules or return to the current rules will be all but impossible. This decision will impact our marshes forever, and we cannot return to the status quo once the new rules take effect. I strongly oppose the new rules.

Thank you for your consideration.

Sincerely,
Steve J. Smith

[REDACTED]
[REDACTED]
[REDACTED]

Sent from my iPhone

Patrick, Diana

From: MIRANDA OSHIELDS <civinput@newmode.io>
Sent: Wednesday, July 22, 2026 8:24 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
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- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
MIRANDA OSHIELDS



Patrick, Diana

From: John Tomkiewicz <civiciinput@newmode.io>
Sent: Thursday, July 23, 2026 8:22 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

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- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
John Tomkiewicz



Patrick, Diana

From: Jen MacGregor <civicinput@newmode.io>
Sent: Thursday, July 23, 2026 10:24 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

One of my great pleasures is getting onto the water in my kayak, paddling, and appreciating nature. Please help protect our waterways, animals and ensure space for all people to use and enjoy the waterways, dock owners or not.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

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- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Jen MacGregor

A thick black horizontal bar used to redact the signature of Jen MacGregor.

Patrick, Diana

From: Anna DunLany <civiciinput@newmode.io>
Sent: Thursday, July 23, 2026 11:01 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

I have seen firsthand the adverse effects new docks have on an ecosystem, providing less vegetation and living space for animals. In addition to these proposed rules, the concept of every house in a neighborhood having dock access in itself is excessive and damaging to the environment. I implore you to rethink this new proposal and to ask the coastal communities how we can all commit to a more sustainable ecosystem. Below is the commentary from 100 Miles, a wonderful advocacy group I support.

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

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- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Anna DunLany



Patrick, Diana

From: Ashley Simpson <civicinput@newmode.io>
Sent: Thursday, July 23, 2026 11:08 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

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- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Ashley Simpson

Patrick, Diana

From: Nancy Maier <civinput@newmode.io>
Sent: Thursday, July 23, 2026 11:12 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

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- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Nancy Maier



Patrick, Diana

From: Nancy Maier <civiciinput@newmode.io>
Sent: Thursday, July 23, 2026 11:14 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

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- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Nancy Maier



Patrick, Diana

From: Brad Kinzey <bkinzey@kinzeyconstruction.com>
Sent: Thursday, July 23, 2026 12:26 PM
To: Comments, CRD
Subject: Georgia Coastal Docks
Attachments: Georgia Docks.pdf

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.

Hello Jill

I hope you are doing well. Please find attached a letter in support of the proposed changes to Docks.

Thank You

Brad Kinzey
Kinzey Construction Company
4200 Northside Parkway
Building 14, Suite 300
Atlanta, Georgia 30327
Ph:404 814-6000
www.Kinzeyconstruction.com

Bradford Allen Kinzey
[REDACTED]
[REDACTED]

July 22, 2026

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

Re: Dock changes

I am writing in support of the proposed dock changes. My wife and I fully support the proposed changes, particularly the minor increase in the dock walkway and fixed dock area. It will be good for everyone along the coast of Georgia and will provide the safety that the public deserves with little or no impact on our marsh area.

Sincerely

A handwritten signature in blue ink, appearing to read "Brad Kinzey", with a long horizontal flourish extending to the right.

Brad Kinzey

Patrick, Diana

From: Sam Walker <civiciinput@newmode.io>
Sent: Thursday, July 23, 2026 1:21 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

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- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Sam Walker



Patrick, Diana

From: keith miller [REDACTED] >
Sent: Thursday, July 23, 2026 1:36 PM
To: Comments, CRD
Subject: New rules.

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It seems to me that the rich people are offended by " their view " more than the rights of other people.

1. Expansion

The VAST amount of docks have zero effect on the marshes. The expansion of the dock itself is a good move. Boats today are much larger than they used to be. Docking these boats necessitates larger docks. To some degree the larger docks increase fish habitat (pilings, hiding, more feeding opportunities.)and more recreational use for the owners. It cost a lot of money to build and maintain a dock.

Let the owners get as much enjoyment as they can.

2- marsh encroachment

Even if the walkway width is expanded, the marsh effect can be mitigated. It would be easy to use grating in instead of a solid board walkway. This would allow sunshine to pass through, And continue to grow and perform its natural function.

Expansion also creates habitats for numerous types of birds to build nest. We have Purple Martens and barn swallows under our dock. The bats nest under the caps on our pilings.

3- Permitting

The permitting process seems much more complicated than necessary. I understand the Corp of Engineers has requirements dictated. It would be better if the system were so that a person of reasonable intelligence could do it himself / herself. Hiring a consultant is very expensive. +\$5000. The price of building a dock is already astronomical. In my humble opinion the process could be simplified.

4- Revocable Permits

Revocable means the permit can be cancelled at any time by the State or Corp of Engineers. This alone will keep the permit owner invested in protecting and maintaining the property So as to avoid losing their permit.

5- Environmental

Environmentalists will always shout to the heavens that we are destroying the earth, and the sky is falling. I'm not the smartest person around, but their cry's seem to be for their personal agendas. Not for the actual conservation that they preach about. That said, I'm against damaging the marshlands as much as anyone else. I just don't see the harm in changing the current rules. I was in construction for 30 plus years. There are ways to build these proposed changes with very very little impact on the environment.

Thank you for listening to

Myself and other concerned citizens. It's great that the state is accepting public comment. Hopefully we can work together and manage our concerns Impartially.

Patrick, Diana

From: mike english [REDACTED]
Sent: Thursday, July 23, 2026 2:10 PM
To: Comments, CRD
Subject: Dock Guidleines

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Greetings!

As a resident of Sea Island, I would like to share my support for the proposed changes to the dock guidelines that allow for a wider pier/walkway. I believe this proposed change provides a safer width than the current regulation.

Thank you for considering this input.

Best regards,
Mike English

[REDACTED]t
[REDACTED]

Patrick, Diana

From: Pat Gallagher <civicinput@newmode.io>
Sent: Thursday, July 23, 2026 2:15 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks. Extending the dock length to over 1000 feet and allowing its widening to six feet to accommodate golf carts seems excessive, a danger to the wildlife habitats and a bigger impacts on our wetlands all coastal Georgians love and rely on for both business and recreation. This does not even get into the changes to the beauty of the landscape disrupted by those massive docks. Please consider the lasting impact. Coastal Georgia is a beautiful place to live. Lets keep it that way.

Thank you for considering my comments,
Pat Gallagher



Patrick, Diana

From: James Wynn <civinput@newmode.io>
Sent: Thursday, July 23, 2026 2:15 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
James Wynn



Patrick, Diana

From: Kim Kroscavage <kkroscavage@ghsmlaw.com>
Sent: Thursday, July 23, 2026 3:32 PM
To: Comments, CRD
Cc: Jud Turner
Subject: Comment Letter re: PRD Rule
Attachments: LTR DNR (to) 07.23.2026 (PRD Rule Comment Letter) (01172372xBACF7).pdf

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.

Ms. Andrews,

Please see the attached correspondence from Jud Turner.

If you have any questions, please let us know.

Thank you,

Kimberley M. Kroscavage
Gilbert Harrell Sumerford & Martin, P.C.
Post Office Box 190 (31521-0190)
777 Gloucester St., Ste. 200
Brunswick, GA 31520
P: (912)265-6700
F: (912) 264-0244
www.gilbertharrelllaw.com

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GILBERT, HARRELL, SUMERFORD & MARTIN, P.C.

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jturner@ghsmlaw.com

July 23, 2026

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520
Email: crd.comments@dnr.ga.gov

Re: Notice of Proposed Regulation Change: Proposed Amendments to Rules for Private Docks over State-Owned Tidal Water Bottoms, Rules 391-2-1-.01 through 391-2-1-.08, Creating Rule 391-2 -1-.09.

Dear Ms. Andrews:

Please accept these comments in response to the above-noted proposed rule. I represent a number of private landowners on the coast in permitting and compliance issues related to private recreational docks (PRDs). I have worked closely with the Coastal Resources Division (CRD) over the years to try and resolve landowner disputes over dock corridors and revocable licenses issued for PRDs. I applaud the Department's determination to work towards final promulgation of rules related to PRDs. They are long overdue and I believe that their finalization will lead to more consistent application of revocable licenses for PRDs over state-owned tidal water bottoms.

With respect to the proposed rule, I am submitting the following comments and suggested revisions for consideration by the Department.

391-2-1-.07 Variances

New or modified private single family and multi-family docks must be constructed according to the standards described in Rule 391-2-1-.04. However, variances may be granted by the department as described in this paragraph, provided the applicant or licensee provides justification and demonstrates in a manner

satisfactory to the department, why the standard(s) cannot be met. The decision as to whether a variance will be granted is at the sole discretion of the department.

- (1) The department may grant a variance allowing the length of the fixed walkway on a new private dock to exceed 1,000 feet for the sole purpose of accessing the waterway nearest to the upland. Such walkway exceedance shall not exceed ten percent of the standard allowable length (i.e. 100 feet) and must constitute the shortest route to the waterway, as determined by the department.**

Comment:

Including a variance procedure related to walkway length is a sensible addition to the proposed rules. However, the concrete limit of ten percent is arbitrary and unsupported by any data or evidence of impact to the marsh ecology. The department will face numerous line drawing challenges as, inevitably, proposed docks will need various additional walkway exceedance lengths greater than ten percent in order to reach a waterway nearest to a landowner's upland parcel. Given that challenge and the lack of any impact data which would support a variance limit of ten percent for a walkway exceedance, a percent variance limitation is arbitrary.

I would recommend that proposed Rule 291-2-1-.07(1) be amended to remove the ten percent limitation and instead require minimization measures be implemented as a license condition for docks over 1,000 feet in walkway length. Those minimization measures could include construction of the walkway out of alternative light penetrating decking materials, extended piling spacing or increased elevation of the walkway (or some combination of these).

Alternatively, at a minimum, landowners should be able to receive a variance in order to access waterways in which neighboring landowners already have access. It is undisputed that docks exist throughout the coast with walkways exceeding 1000 feet from the riparian upland parcels at issue in order to reach deep water. Allowing landowners a walkway exceedance variance equivalent to that which was necessary for other upland parcels to access the same waterway is both equitable and a balanced approach. As such, it would also have the benefit of preempting the department's need to defend an arbitrary walkway exceedance variance limitation.

Proposed Revisions:

- (1) Strike second sentence under 391-2-1-.07(1) and replace with: ***“The department may require additional minimization measures to be implemented as a condition of the variance which may include construction of the walkway with alternative light penetrating decking materials, extended piling spacing or increased elevation height for the walkway or a combination of these.”***

OR

- (2) 391-2-1-.07(1) should be amended by inserting the following into the second sentence: ***“Such walkway exceedance shall not exceed ten percent of the standard allowable length (i.e. 100 feet) unless a greater walkway exceedance is required to provide access for an applicant or licensee to a waterway the department has previously provided access for other neighboring upland parcels. If a walkway exceedance of greater than ten percent is needed to provide equitable access, such exceedance shall be limited to the distance needed to provide access to that waterway from the upland parcel*** and must constitute the shortest route to the waterway, as determined by the department.

Thank you for your consideration of these comments and proposed amendments to the proposed rules. Let me know, if you'd like to discuss the above-noted suggestions.

Sincerely,

/s/ Judson H. Turner

Judson H. Turner

Patrick, Diana

From: Frampton Simons [REDACTED]
Sent: Thursday, July 23, 2026 4:20 PM
To: Comments, CRD
Subject: New rules docks NO!

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.

Please vote against the proposed new rule for expanded dock size. Georgia's marshes are some of our most treasured assets. Expanding the coverage to 6000 square feet of coverage and 6 feet wide would be a terrible mistake. Already, the many docks up and down the coast are ruining our sight lines. This expansion would increase dramatically the construction of more extremely long docks. Many tourists visit our state to see our beautiful natural marshes, not a mass of manmade structures. **They come to see the "Marshes of Glynn," not the "Docks of Glynn."** Lots of government funds are spent to promote places like the Golden Isles. Many residents livelihood depends on these tourists. Fewer tourists may come due to these expanded docks, which would have a negative impact on our citizen's financial well being. Additionally, home values and property taxes may decline with these new rules. Other taxes may have to be increased to make up for these lost revenues.

Massive golf carts aren't required to access the marsh and docks. Many different wheelchairs, both motorized and non-motorized, are available on the market. Many of these are cheaper than expensive golf carts. More options are available each year.

Gas powered carts are extremely loud, creating noise for all other users in the vicinity. Additionally, gas carts leak oil and gas into our marsh, which would be terrible for our vital fishing and guiding businesses. Will the increased number of carts be restricted to electric carts? This would require additional burdens on overstretched law enforcement to police possible environmental degradation.

Scientific studies have proven that expanded cover over marshes make the marshes less productive. Less productive marshes inevitably means lower harvests for our fisherman and shrimps. This could impact their livelihoods. We don't need to make it harder for our citizens to earn a living.

Large new railings would be needed to insure carts do not go into the marsh. These railings would be more vertical obstructions further degrading sight lines of our beautiful, natural marsh.. Who will remove carts that fall into the marsh? How many people will be injured in golf cart accidents on docks? Are funds being allocated to police impaired driving on docks or underaged driving? Will all the docks that are damaged in hurricanes be repaired or left to rot? Who will police this? Do we really want to add more unfunded burdens for law enforcement?

Everyone is for reasonable access for disabled and elderly citizens, but it must be accompanied with rules that protect our environment and the livelihoods of our citizens. Golf carts go can almost anywhere in our state, but there are common sense restrictions on where they can go. Increasing dock size to encourage greater use of golf carts into the marsh is not common sense. Please vote against this expanded dock size construction.

Frampton Simons

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPhone

Patrick, Diana

From: Steilen, Scott <ScottSteilen@seaisland.com>
Sent: Thursday, July 23, 2026 4:48 PM
To: Comments, CRD
Cc: Steilen, Scott
Subject: Letter in support of proposed dock rules
Attachments: Jill Andrews Letter.pdf

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.

Jill

I hope you are well. Please see the attached letter supporting the proposed dock rules on behalf of Sea Island Company.

Scott Steilen

President and CEO

P: 912-634-3912

F: 912-638-5805

scottsteilen@seaisland.com

P.O. Box 30351, Sea Island, GA 31561

Experience Sea Island at seaisland.com



Patrick, Diana

From: [REDACTED]
Sent: Thursday, July 23, 2026 4:54 PM
To: Comments, CRD
Subject: comments on proposed rules for Private Docks in tidal waters

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 Jill Andrews & coastal resource committee,

Please help secure our public land held in trust, our salt marshes.
No one has the right to put up a dock and boardwalk over our marshes.
We need to preserve this habitat and not fragment it with docks.
Please protect our view shed and the scenic beauty of our coast.

Having lived beside the salt marsh for over 20 years, I have witnessed marine debris from damage done to docks by storms and poor maintenance/construction.
All docks if approved must be limited in size and have certified builders and code inspections.

Please build safeguards for our marshes into your rules.

Sincerely,
Elizabeth King

Patrick, Diana

From: Cynthia Keyes <civicinput@newmode.io>
Sent: Thursday, July 23, 2026 4:54 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Cynthia Keyes

Patrick, Diana

From: Rosie Parsons <civicinput@newmode.io>
Sent: Thursday, July 23, 2026 6:58 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

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- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Georgia has such a precious and unique coastline, unlike anywhere in the world. Don't let America Capitilise it to ditriment its natural beauty!

Thank you for considering my comments,



Patrick, Diana

From: Duane Harris [REDACTED]
Sent: Thursday, July 23, 2026 7:38 PM
To: Comments, CRD
Subject: Proposed Recreational Dock Rules
Attachments: Comment on proposed dock rules.docx

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Please see the attached comments. Thanks, Duane

Duane Harris



July 24, 2026

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, Georgia 31520
via Email: crd.comments@dnr.ga.gov

Dear Jill:

I've reviewed the proposed amendments to Subject 391-2-1 of the Rules of the Department of Natural Resources to establish rules for private docks located over state-owned tidal water bottoms and offer the following comments.

It appears, given the public process the division has pursued in establishing these proposed rules that the agency has done a very good job balancing the rights of riparian owners with the protection of coastal marshlands. I am especially happy to see the six foot width for a dock of up to 1000 feet is allowed. At one time there was discussion of a maximum square footage limit for the fixed walkway which would have necessitated a width of only three feet. This was, in my opinion, totally unreasonable. I am also happy to see a variance process included. This would allow the agency to consider docks which might exceed the 1000 foot limit has been proposed as well as for additional boat hoists. As we know, the 1000 feet limit is arbitrary and I was always concerned about having to testify as to why a 1010 foot fixed walkway length was a problem when 1000 feet was not.

Finally, under the variance provision, there is the language "if there is no reasonable objection by adjacent property owners". The term reasonable is subject to so much interpretation that is could be problematic. Thank you for the opportunity to comment.

Sincerely,

Duane Harris

Patrick, Diana

From: Patricia Varnadore [REDACTED]
Sent: Thursday, July 23, 2026 9:09 PM
To: Comments, CRD
Subject: Dock and private property Owners

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.

I am conservative by nature and protect our Georgia resources by my very nature. I also spent decades serving our geriatric community. As a property owner I believe in property rights and accessibility of your property. Someone else should not dictate or restrict our rights. Commerical access needs to be regulated far more look to Sapelo incident. You own property it is yours not the city, county or state. But we should provide an education to property owners a class to complete before issuing permits. This will encourage and educate owners take appropriate choices. Choices are much more received better than a mandate. We have two sets of rules one for developers and high income resources. Then we have another for small businesses and working folks. The first group needs monitoring as it's about the money. Again DNR thank you for protecting our very limited Georgia coastal resources. Patty V Sent from my iPhone

Patrick, Diana

From: Pat Farrell [REDACTED] >
Sent: Thursday, July 23, 2026 9:10 PM
To: Comments, CRD
Cc: Pat
Subject: Rule Making Comments
Attachments: LTR DNR (to) 07.21.2026 (Pat Farrell Comment Letter) (01171768xBACF7).DOCX

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.

Hi Jill , please find my comments attached for the public record concerning the new proposed rules for private residential docks.

Thanks,
Pat Farrell

Sent from my iPhone

July 21, 2026

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520
Email: crd.comments@dnr.ga.gov

Re: Notice of Proposed Regulation Change: Proposed Amendments to Rules for Private Docks over State-Owned Tidal Water Bottoms, Rules 391-2-1-.01 through 391-2-1-.08, Creating Rule 391-2 -1.09.

Dear Ms. Andrews:

Please accept these comments in response to the above-noted proposed rule. My name is Pat Farrell, and I serve as Chatham County Commissioner for District 4. I am also a resident of Skidaway Island and avid outdoorsman. In particular, I love to fish and boat along the Georgia coast. I was asked to serve on the Private Recreational Docks (PRD) Stakeholder Committee for these rules and attended numerous meetings through 2025 regarding regulation of private docks. I write in response to the maximum dock dimensions addressed in the proposed rules as well as the proposed variance process excerpted below.

391-2-1-.07 Variances

- (1) The department may grant a variance allowing the length of the fixed walkway on a new private dock to exceed 1000 feet for the sole purpose of accessing a waterway nearest to the upland. Such walkway exceedance shall not exceed ten percent of the standard allowable length (i.e., 1000 feet) and constitute the shortest route to the waterway, as determined by the department.**

It is my view that there should be no limit to the length or width of docks on the coast. I have studied this issue closely during the stakeholder process and asked CRD repeatedly for data which would support the need for these draconian dock specification limitations, in particular the length limits. I have reviewed the 2012 Report funded by the Army Corps of Engineers on the Cumulative Impacts of Private Recreational Docks in Coastal Georgia. The minor cumulative impacts noted in the Corps report certainly do not justify the proposed

dock walkway limitations. For instance, the report projects marsh shading from docks and walkways of less than 1/10 of a percent by 2030. During the stakeholder process, I asked repeatedly for cumulative impacts data in addition to the Corps study which would help landowners and the public understand the science which would form the basis for such a limitation. Such information was never provided to the stakeholders.

The only data that we received related to marsh impacts from PRDs came in the form of a presentation of a 2006 study by Clark Alexander at Skidaway Institute stating that dock shading reduces the density of marsh under docks and anecdotal evidence around how marsh rack can be trapped by dock pilings. The study demonstrates that docks don't even block all growth, just a reduction in density of the marsh.

If a landowner on the Georgia Coast needs to build a walkway that is 1500 feet or longer in order to access deep water, he or she should be allowed to do so. CRD has produced no evidence showing that this will have any significant impact on the ecology of the coast. Given that fact, this agency should not arbitrarily restrict a riparian landowner's ability to access deep water and in turn the value of that upland parcel. Moreover, the cost of modern dock construction on the coast guarantees that few riparian landowners would even be able to afford the construction of such a longer dock. As I stated at the DNR Board meeting in June at FDR State Park, the length of docks is "self-regulating." There simply will not be that many long docks that landowners are willing to construct. Thus, when combined with the fact that no cumulative impacts data exist to suggest that PRDs are causing significant environmental impacts on the Georgia Coast, setting a maximum length limit for walkways is not justified or necessary.

I strongly recommend striking any maximum walkway length limitation from these proposed rules.

Sincerely,

/s/ Pat Farrell

Pat Farrell

Patrick, Diana

From: Leslie Campbell [REDACTED]
Sent: Thursday, July 23, 2026 9:29 PM
To: Comments, CRD
Cc: sturner@savannahga.gov
Subject: New Private Dock proposed rules comments

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 Ms Jill Andrew's,

I would like to voice opposition to these proposed rules.

My understanding is that these rules change the private dock size allowance from 3000 sq.ft. to 6000 sq.ft. This would allow effectively allow a dock of 1000 ft long and 6 ft wide!! This kind of encroachment into the marshes would severely damage our fragile beautiful waterways and wetlands.

We need to protect these resources, not damage them to appease some developers or connected homeowners. Can you imagine if your neighbor built a monster dock right next to you? Or suddenly having dock after dock impeding your kayak or canoe journey?

Fishes, turtle and even dolphin habitat would be impacted and these are creatures tourists want to see and experience in as pristine an environment as possible.

I am not an activist but boy, this proposal really seems outlandish and non-sensical.

Please reconsider

Thank you
Leslie Campbell

[REDACTED]

Sent from Leslie's iPhone

Patrick, Diana

From: Alice M. Keyes <alice@onehundredmiles.org>
Sent: Thursday, July 23, 2026 10:41 PM
To: Comments, CRD
Cc: Rabon, Walter; Santos, Trevor; Nancy Addison; billjonesiii@seaisland.com
Subject: Comments on Draft Rules for Private Docks
Attachments: OHM Comments - July 2026 FINAL PDF.pdf

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 Ms. Andrews,

Please accept the attached comments and recommendations regarding the Coastal Resources Division draft rules on private docks. These comments are submitted on behalf of the following conservation organizations: One Hundred Miles, Birds Georgia, Coastal Georgia Audubon Society, The Nature Conservancy of Georgia, Ogeechee Riverkeeper, Satilla Riverkeeper, and Wild Cumberland. We you urge to amend the draft rule to clarify ambiguous definitions and reinstate science-based standards that are more protective of our marshes and state-owned tidal waters.

Contact me at any time if you have questions.

Thank you,

- Alice M. Keyes

Alice M. Keyes
One Hundred Miles
912-230-6494

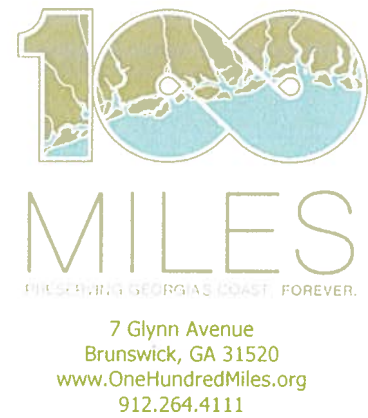
www.OneHundredMiles.org



Submitted electronically to: crd.comments@dnr.ga.gov

July 23, 2026

Georgia Department of Natural Resources Board
c/o Ms. Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520



*RE: Comments on amendment of Subject 391-2-1 to establish rules for private docks
in state owned tidal waters.*

Dear Ms. Andrews and members of the Department of Natural Resources Board,

Thank you for the opportunity to submit comments regarding the proposed new rules for private docks in state owned waters – Subject 391-2-1 (herein referred to as the draft rules). One Hundred Miles (OHM) is a nonprofit organization dedicated to protecting Georgia's 100-mile coast through advocacy, education, and community engagement.

Since 2024, OHM has supported the Department of Natural Resources' (DNR) efforts to codify standards governing revocable licenses for private docks. We appreciate the agency's commitment to establishing clear and transparent rules. However, **we do not support the draft rules released in June 2026**. As written, they introduce significant loopholes, depart from long-standing, science-based standards, and allow impacts to public marshlands that exceed what has historically been permitted under Georgia's coastal management framework.

On behalf of OHM and other members of the conservation community, including Birds Georgia, Coastal Georgia Audubon Society, The Nature Conservancy of Georgia, Ogeechee Riverkeeper, Satilla Riverkeeper, and Wild Cumberland, we urge the Georgia Coastal Resources Division (CRD) to amend the draft rule to clarify ambiguous definitions and reinstate science-based standards that are more protective of our marshes and state-owned tidal waters.

The Georgia DNR is entrusted with the responsibility to protect waters of the state. The Coastal Marshlands Protection Act (CMPA) 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."¹ Although private docks are exempt from permitting under the CMPA (O.C.G.A. §12-5-295), they remain coastal infrastructure with the potential to affect marsh habitat, water quality, navigation, and neighboring property owners.

¹ O.C.G.A. §12-5-281 *see also id.* § 52-1-2 (finding the State of Georgia is trustee of the rights of Georgians to use tidewaters for fishing, passage, navigation, commerce, and transportation under the public trust doctrine and that the protection of tidewaters "has more than local significance, is of equal importance to all citizens of the state, is of state-wide concern" and may be regulated under the police powers of the state).

Accordingly, the standards governing private dock licenses should be clear, transparent, and scientifically defensible, as well as consistent with the intent of the CMPA. The draft rules fail to meet this standard. If adopted, they would allow larger structures, greater marsh impacts, and weaker public protection than existing practices. The result would be increased impacts on critical wildlife habitat, diminished marsh function, degraded viewsheds, and adverse effects on joining property owners.

Most concerning, **the draft rules allow private recreational docks to exceed the baseline maximum dimensions currently allowed for commercial docks, community docks, and marinas** outlined under Georgia's CMPA and associated regulations.² This outcome is inconsistent with both the intent of the CMPA and the principle that private uses of public marshlands should remain limited and minimally impactful.

The draft rule will allow a private dock to include a 1,000 linear foot walkway (or 1,100 feet if a variance is granted) at six (6) feet wide, implying a total of 6,000-6,600 square feet. This footprint exceeds the legal definition of "minor alteration" of marshlands. The CMPA defines "minor alteration" as "any change in the marshlands which, taken singularly or in combination with other changes, involve less than 0.10 acres. Minor alteration also includes renewal of permits previously issued by the committee."³ Georgia Rules for the CMPA mirror the Act's definition, defining "minor alteration" as, "any change in the marshlands which, taken singularly or in combination with other changes, involve less than 0.10 acres."⁴ **The private dock rule must include a standard of a maximum square foot size limit that is less than 0.10 acres for all structures over state-owned tidal water bottoms, in keeping with the intent of the CMPA.**

These rules must be clear and consistent with other regulations and avoid endorsing activities that exceed the agency's own definition of a minor alteration. Moreover, this draft rule risks establishing a precedent that could erode the stronger protective standards currently applicable to commercial docks, community docks, and marinas.

- Section 391-2-1-.04 must be amended to add a condition that a proposed private dock shall not exceed 0.10 acres. As currently written, subsection (4) allows 1,000 linear feet at 6 feet wide, which totals 6,000 square feet, equating to 0.138 acres. If the full variance is granted, that impact increases to 6,600 square feet or 0.15 acres.
- A maximum square footage that does not exceed 0.10 acres grants flexibility to the property owner, allowing for docks that are compliant with American Disabilities Act (ADA) standard for walkways (which is 36 inches⁵). Providing an extra foot of width beyond ADA design standards could accommodate people in wheelchairs, while not exceeding the 0.10 acres alteration of the marsh.

² Rule 391-2-3-.03 Regulation of Marinas, Community Docks and Commercial Docks

³ O.C.G.A. §12-5-282(9)

⁴ Rules and Regulations of the State of Georgia 391-2-3-.03(2)(q)

⁵ Chapter 4: Accessible Routes, American Disabilities Act (ADA) - <https://www.access-board.gov/ada/guides/chapter-4-accessible-routes/#clearances>

- Amending the draft rule to include a maximum square footage, should also align with South Carolina's dock standards (4,000 sq feet)⁶ and fall under the impact threshold established by the U.S. Army Corps of Engineers for mitigation of impacts.

The draft rules also fail to clarify the conditions under which a landowner can apply for a new revocable license. As currently written, the draft rules introduce ambiguities that could allow anyone with an existing revocable license to rebuild or reconstruct any aspect of their existing dock to the new, larger standards. Additionally, the rules have weak requirements for landowners to notify adjacent property owners.

To mitigate these and other negative consequences of the draft rule, we offer the following comments.

SECTION 391-2-1-.02: Definitions

- Add a definition of multi-family dock, as referenced in O.C.G.A. §12-5-295(7.1) and used in many locations in the draft rule, such as 391-2-1-.03(2), and (2)(h); .04(1)(b), .04(8)(b).
- Clarify the definition of (16) "modification" and (21) "reconstruction."
 - There is considerable overlap between the definitions of (16) "modification" and (21) "reconstruction." This rulemaking must clarify the distinction between the two.
 - "Modification" suggests a smaller change, but the definition of modification includes language that can be read broadly and encompass a larger scale of change than what is colloquially understood by the term ("change to the footprint of"). This could be achieved by setting a maximum square footage threshold or identifying what aspects of a dock can be modified (e.g., moving the location of a davit or replacing the runners of a boat lift, but not widening the fixed walkway).
 - "Reconstruction" implies a full-scale replacement of the structure, but the definition says this occurs "in the original footprint." The component of the definition is incongruous with Section 391-2-1-.05(2), which says that reconstruction of non-serviceable docks must adhere to the new standards, which expand the allowable footprint.
 - Additionally, Section 391-2-1-.05(1) states that both modifications and reconstructions of existing docks require a new revocable license, raising the question of why a distinction needs to be drawn between the two terms.
- Clarify the definition of (25) "serviceable."
 - The definition provided by the draft rules centers around a dock being "useable," which is a broad standard that could enable DNR to hold that even minor issues render a dock component not "serviceable."
 - The vulnerability of this ambiguity is displayed in Section 391-2-1-.05(2), which states that "Reconstruction of dock components deemed not serviceable by the department must adhere to the standards for new private docks set forth in Rule 391-2-1-.04."

⁶ https://coastalgadnr.org/sites/default/files/crd/pdf/240123_PrivateDockStateComparison.pdf

- Under these conditions, an applicant could argue that an undamaged, functional existing dock that is three (3) feet wide is not "serviceable" because it is not accessible by a small, motorized vehicle.
 - "Serviceable" should be redefined to require some level of damage or disrepair that creates a safety risk for a component to qualify as not "useable."
- Requiring the applicant to submit a scaled drawing (subsection 24) is a reasonable requirement. This provision should be strengthened by requiring the drawing to be prepared and submitted by a qualified professional.
- Eliminate the definition of variance, based on the validation presented below in draft rule section .07.

SECTION 391-2-1-.03: Issuance of a Revocable License

- Subsection (1) states that the applicant must provide, "evidence that adjacent property owners were appropriately notified of the application."
 - Add a requirement that the applicant provide surrounding property owners with accurate drawings, dock specifications, and clearly drawn dock corridors so the neighbors can make informed comments about the impact the proposed dock will have on their own property and shared resources.
- It is good to see that Subsection (2)(h) requires applicants for multi-family docks to include a covenant that prohibits future private docks.
 - Amend Subsection (2)(h) to require a review or documentation of subdivision or unification of lots, in the case that a multi-family dock is proposed to be converted to a single-family private dock.
- Add a condition that the applicant shall provide proof that the upland lot has an existing single-family residence or that the upland lot is buildable for a single-family residence

SECTION 391-2-1-.04: Standards and Conditions of New Private Docks

- Again, Section 391-2-1-.04 must be amended to add a condition that the proposed dock does not exceed 0.10 acres. Such a standard would allow for a new dock to be accessible for people with mobility issues but not exceed the definition of minor alteration.
- Subsection (8) should be amended to add that floating docks "...shall not lie less than two feet above the water bottom at MLW and cradles must be used to support floating docks at least two feet above water bottom." This was discussed and agreed to among the stakeholder committee.
- Subsection (12) that requires a description of electric and water lines to the dock is a step in the right direction, but we recommend the condition be expanded to capture all local and state building codes and safety standards.

SECTION 391-2-1-.05: Reconstruction and Modification of Existing Private Docks

- See comments on definitions and the need for clarity in the definitions of reconstruction, modification, and serviceable.

SECTION 391-2-1-.06: Maintenance of Existing Private Docks

- Remove the statement "however it may be reconstructed or modified according to Rule 391-2-1-.05," which grants the applicant the ability to rebuild a fully functional dock beyond the existing footprint but in compliance with the new standards that exceed a "minor alteration."⁷

SECTION 391-2-1-.07: Variances

- This section should be struck from the draft rule and DNR should only revisit the idea after more research is conducted and the CRD coordinates with other divisions and agencies. Variances to standards and conditions only add confusion to the already complicated process.

As was recommended by the private recreational dock stakeholder committee, CRD should not incorporate a variance into the revocable license review process. Instead, the agency should, "Continue to investigate the development of an objective and science-based model to consider exceedance of current standards in proposed dock design and mitigation practices to reduce the impacts to the marsh using criteria that CRD deems appropriate (shading, marsh wrack, fragmentation, habitat, viewshed, cultural and historic resources, etc.)."⁸

- The following conditions should be added to any variance process pursued by the department.
 - Add a requirement that this process will be publicly noticed, with a window of opportunity for the public to review and comment.
 - The public review could be coupled with applicable federal agencies. This is a prudent step since, as proposed, the variance would result in walkways/docks that are 6,600 square feet long (0.152 acres) exceeding the 0.10 acres threshold the U.S. Army Corps of Engineers has established for compensatory mitigation requirements for wetland impacts.
 - Remove the possibility for additional boat hoists. Imposing such structures has a major and lasting impact on the surrounding property owners and possibly the navigability of the waterway.
 - Remove the allowance for a dock to extend up to one-third of the waterway width at MLW. This is a navigability issue that affects more than adjacent property owners and is subject to the permission of the U.S. Army Corps of Engineers.

⁷ O.C.G.A. §12-5-282(g); Ga. Comp. R. & Regs. 391-2-3-.03(2)(q)

⁸ Process Summary Report on the Private Recreational Docks Rulemaking Stakeholder Committee, March 12, 2025; <https://coastalgadnr.org/sites/default/files/crd/pdf/ProjectandProcessReport.pdf>

SECTION 391-2-1-.09: Inspections; Revocation, Suspension or Modification of Revocable License; Penalties

- Add a section instituting a fee for each application to be processed. We recommend that the rule clarify that the fees will be dedicated to supporting CRD application review, site visits, and clean-up efforts needed after storm events.
- In Subsection (4) add in the case of violation of provisions of the rule, CRD may charge fines, and indicate how the fines will be used.

Additional items

This new rule should be amended to accommodate the following:

- Invest in an updated and accurate dock database. Common sense dictates that we should not increase activities that result in impacts to our public marshlands until we fully understand what is out there right now. South Carolina has an excellent, detailed public dock database with maps and accurate dimensions for each structure that Georgia could use as a model.
- Establish an application fee system to provide adequate funds to CRD staff conducting thorough application review, following up with applications with field assessments, and cooperating with other divisions impacted by this rule. Such fees could also be used to support clean-up for post-storm/hurricane debris caused by docks or support the development and maintenance of a dock database.
- Develop a Georgia Coastal Dock Builder Certification program. South Carolina has a robust program that Georgia could use as a model.

It is our understanding that a key motivation for the proposed rule changes is to allow dock walkways wide enough to accommodate golf carts.⁹ However, expanding the maximum allowable walkway width to six (6) feet is not necessary to provide access for individuals with limited mobility or disabilities. A four (4) foot wide walkway can accommodate wheelchairs and mobility scooters.

If the intent of the six (6) foot width is to facilitate golf cart access, CRD should also consider how users would safely turn the golf cart around and return to high ground. A six (6) foot walkway alone is unlikely to provide sufficient space for a golfcart to turn around. As a result, applicants seeking to use golf carts would likely also request variances for wider areas at or near the end of the walkway to accommodate turning movements. Increasing the allowable walkway width to six (6) feet would already significantly increase shading and other environmental impacts. Additional widening to facilitate golf cart maneuvering would further exacerbate those impacts.

⁹ DNR Board Coastal Committee Meeting, May 2026: <https://dnr.box.com/s/ceiqe2sbsx5h4j4jtt47b39ixt6eiqu>

To conclude, we appreciate CRD's efforts to codify the standards and conditions governing the issuance of revocable licenses for private docks. Clear, consistent, and transparent rules are essential to balancing private access with protection of Georgia's publicly-owned tidal waterways.

Any new rule adopted by the DNR Board must be grounded in science, aligned with the intent of the Coastal Marshlands Protection Act, and informed by decades of research documenting the environmental impacts associated with dock construction and expansion. Studies by respected Georgia scientists have documented impacts to marsh vegetation,¹⁰ wrack accumulation,¹¹ water quality and water flow.¹² Studies also show that marsh parcels with docks/piers had lower abundance and species richness of protected avian species, and marsh with docks/piers also had greater abundance of predatory species, such as gulls, herons and egrets, contributing to the reduction in species abundance.¹³ At the same time, research indicates that Georgia's marsh ecosystems, underground biomass in particular, are already experiencing stress and decline.¹⁴

For these reasons, **the CRD should amend the draft rules to restore meaningful limits on dock size, eliminate ambiguities that could allow expansion of existing structures, and ensure that any departures from established standards are supported by objective scientific review.** The DNR Board should not weaken longstanding protections simply to accommodate larger private recreational docks for golf carts. Georgia's coastal marshlands are a public resource held in trust for present and future generations, and the rules governing their use must reflect that responsibility.

Thank you for your service to the State and for your careful consideration of these recommendations. Please contact me at any time if I can clarify any of these comments or offer additional information.

Sincerely,



Alice M. Keyes
Senior Conservation Strategist
One Hundred Miles, Inc.
912-230-6494
alice@onehundredmiles.org

¹⁰ "Quantifying the Ecological Significance of Marsh Shading: the impact of private recreational docks in Coastal Georgia." Submitted to GA CRD by C. Alexander and M. Robinson, August 2006. And "GIS and Field-Based Analysis of the Impacts of Recreational Docks on the Saltmarshes of Georgia" Prepared for Georgia Coastal Zone Management Program by C. Alexander and M. Robinson. July 2004.

¹¹ "Wrack Assessment Using Aerial Photography in Coastal Georgia," by C. Alexander, Skidaway Institute of Oceanography, April 2008.

¹² "Environmental Effects of Docks and Marinas" prepared for the Georgia Coastal Research Council stakeholder workgroup by M. Alber and J. Flory. June 2005.

¹³ "Effects of Long Piers on Birds in Tidal Wetlands." By A. Banning and J. Bowman. The Journal of Wildlife Management, vol. 73, Issue 8, November 2009. <https://wildlife.onlinelibrary.wiley.com/doi/abs/10.2193/2007-571>

¹⁴ "Early warning signs of salt marsh drowning indicated by widespread vulnerability from declining belowground plant biomass." By K. Runion, M. Alber and others. PNAS Research Article/Ecology. June 2025. <https://www.pnas.org/doi/10.1073/pnas.2425501122>

Copy: DNR Commissioner Walker Rabon - walter.rabon@dnr.ga.gov
Deputy Commissioner Trevor Santos - trevor.santos@dnr.ga.gov
DNR Board Coastal Committee Chair Ms. Nancy Addison - nancyaddison@bellsouth.net
DNR Board Coastal member Mr. Bill Jones - billjonesiii@seaisland.com

Patrick, Diana

From: Stacey Fuller <civinput@newmode.io>
Sent: Thursday, July 23, 2026 10:57 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Stacey Fuller



Patrick, Diana

From: H.H. Hart III [REDACTED]
Sent: Friday, July 24, 2026 7:32 AM
To: Comments, CRD
Cc: islandacessi@gmail.com
Subject: Responce to new proposed DNR dock rules 7-23-26 2nd rev
Attachments: Responce to new proposed DNR dock rules 7-23-26 2nd rev.docx

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July23, 2026

Proposed Dock Rules amendment 391-2-1 Georgia

Thank you for the opportunity to respond to the proposed dock rules amendment. In general, I support the following changes being suggested but I do think there could be more concise wording used.

I submit the following changes for the board's consideration:

Sect 391-2-.02 definitions

(10)" Floating Docks," substitute "POSITIONED " for SUPPORTED and again in 391-2-1 (8) " Floating Docks should be pile "POSITIONED" for SUPPORTED

Sect 391-2-1-03 Issuance of a Revocable license.

We have a personal example of plans drawn for a new adjoining dock that were drawn by a professional engineer in which the extended lot lines were drawn incorrectly and submitted to DNR. We had signed off on the plans submitted but when the dock was built the other adjoining dock owner objected that it encroached on his dock space and violated the lot line extension, and we then also found that it also encroached on our lot line extension. After the owner of the adjoining property on the other side complained a decision was made by DNR to move the offending floating dock toward our dock which then encroached on our dock which we objected to and later had to file a suit in order to have our complaint heard.

Please see: Superior Court of Glynn County, Henry H Hart and Dawn E Hart vs Executive Real Estate, LLC, Department of Natural Resources, State of Georgia

Civil Action CE24-00899

A simple solution to the above suit could have been a requirement to require a current survey of the property to the application to determine extended lines and possible conflicts.

My last comment concerns 391-2-1-.07 Variances: "The decision as to whether a variance will be granted is at the sole discretion of the department.

I think that IF the decision of the board is final, it leaves an adjoining property owner who has an objection to the decision with the only option to go to court to get relief. There should be a way that a adjoining property owner can seek a hearing before the DNR to try and mitigate objection to the concerns on both sides.

I think the above proposed rules are a vast improvement as opposed to the old rules and support most changes proposed.

Henry (Hal) Hart



Patrick, Diana

From: Tom Gore [REDACTED] >
Sent: Friday, July 24, 2026 8:23 AM
To: Comments, CRD
Cc: Frank Williams; Tim Gore
Subject: Comments on Proposed Ga DNR Rules for Private Docks

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Sent from my iPad
DNR Team

I am a property and dock owner in McIntosh County. I own a commercial dock and maintain it also. I appreciate the intended purpose of the rules changes proposed. I'm afraid it will make it more difficult for us to do routine maintenance as needed. I don't see the need to permit any repairs I make on my dock. As the rules are now, I make repairs as needed with no outside input and hope it can remain this way. We work hard to keep our facilities safe for ourselves and others using them.

Please don't make it a more involved process. It is hard enough with current cost of materials, labor and available qualified companies to do the needed repairs. Thank you for the opportunity to share my thoughts. It is a privilege to live and have access to Georgia's waterway's and I hope we can continue to safely do this.

Thomas Gore
Valona, Ga

Patrick, Diana

From: Olive Norman [REDACTED]
Sent: Friday, July 24, 2026 8:38 AM
To: Comments, CRD
Subject: No on wider docks

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I'm opposed proposed amendment of Subject 391-2-1. Building wider docks will disrupt marsh land and escalate the privatization of public land. Expanding docks that are still in good shape adds pollution to the area. Please do not implement this rule.

Thanks,
Olive Norman

Patrick, Diana

From: David Kyler <susdev@gate.net>
Sent: Friday, July 24, 2026 8:42 AM
To: Comments, CRD
Subject: Please confirm receipt of our attached comments
Attachments: Comment Ltr to CRD (Rules for Private Docks), FINAL, 7-24-26.docx; Methodology for tidal marsh assessment, Kutcher,7-26.pdf

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.

Thanking you in advance **for confirming receipt of our attached comments** on Proposed Amendments to Rule 391-2-1, Private Docks Located Over State-Owned Tidal Water Bottoms.

Note that I am also attaching a source document referenced in our comments.

Thank you.

David Kyler
[Center for a Sustainable Coast](#)
912.689.4471



Using science, media, and the law to protect coastal Georgia's
environment and quality of life.

221 Mallory Street, Suite B Saint Simons Island, Georgia 31522

July 24, 2026

Jill Andrews, Chief of Coastal Management
Coastal Resources Division
Georgia Department of Natural Resources
One Conservation Way
Brunswick, Georgia 31520

Via email: crd.comments@dnr.ga.gov

**Re: Comment on Proposed Amendments to Rule 391-2-1
Private Docks Located Over State-Owned Tidal Water Bottoms**

Dear Ms. Andrews:

The Center for a Sustainable Coast submits these comments on the Department's proposed amendments to Rule 391-2-1, which would establish standards for issuing revocable licenses for private docks over state-owned tidal water bottoms. The Center supports the Department's decision to codify clear and consistent standards and appreciates the extensive stakeholder process that produced this package.

These comments raise two matters. First, we strongly advise transparency, rigorous evaluation, and accountability regarding the enlarged footprint of access walkways authorized under the proposed rules (Part I). Second, and as the principal subject of our comments, we identify a procedural gap that allows a single-family dock to be converted to multi-lot use without timely review and recommend amendments to close it (Parts II–V).

I. The proposed standards would enlarge the authorized footprint over public-trust lands without stated justification.

Before presenting comments seeking to remedy a loophole in CRD's current procedures regulating private docks, we want to emphasize our general concern about the proposed size of access structures (boardwalks across the marsh and tidal water bottoms). This concern is directed at the fixed walkways that carry a private dock across the marsh and tidal water bottoms — not at the terminal dock components (fixed decks, floating docks, hoists), whose dimensions the proposed rules address separately.

Under proposed Rule 391-2-1-.04(4), a single-family private dock may include a fixed walkway up to 1,000 linear feet long and six feet wide, with a variance for an additional 100 feet available under Rule 391-2-1-.07(1). These dimensions would roughly double the walkway coverage the Department previously allowed and equal the length the Department allows for a Tier Three community dock, a commercial dock, or a marina, and exceeds the 750-foot limit for a Tier Two community dock serving an entire neighborhood. See Ga. Comp. R. & Regs. r. 391-2-3-.03(4)(a)5, (5)(a)1, (6)(a)2. Yet unlike each of those facilities, the

proposed private-dock standard contains no cap on effective shading impact — the 3,000-square-foot ceiling that constrains community, commercial, and marina walkways has no counterpart here.

Separately, the area maxima that appear to limit the terminal structures understate actual coverage, because gangways "do not count toward the maximum area" (Rule .04(8)) and floating watercraft lifts do not count toward the floating-dock maximum (Rule .04(9)).

These standards would enlarge the private occupation of public-trust lands that the General Assembly has declared a "vital natural resource system," "costly, if not impossible, to reconstruct or rehabilitate once adversely affected," and held by each generation as "public trustees ... for succeeding generations." O.C.G.A. § 12-5-281. We therefore recommend that the Board:

1. Require, before adopting any enlarged dimensional standard, a written resource justification supported by science-based analysis of trade-offs, including cumulative and life-cycle impacts;
2. Adopt an effective-shading-impact ceiling for private-dock walkways comparable to the 3,000-square-foot limit applied to community, commercial, and marina walkways, and count gangways and floating watercraft lifts toward authorized area;
3. If enlarged standards are adopted, require monitoring and assessment of their effects for not less than three years after the effective date — measuring at minimum shading, vegetation loss, and cumulative authorized walkway footprint by waterway — using methods meeting or exceeding accepted marsh-ecology standards, with a report to the Board and an opportunity to revisit the standards (one such methodology is in the attached article, *A Rapid Method to Assess Salt Marsh Condition and Guide Management Decisions*, 138 Ecological Indicators 108841 (2022); and
4. Require mandatory mitigation offsets for projects exceeding the maximum footprint, which we urge be reduced from the level proposed once the analysis above is completed.

II. General revocation authority does not adequately address a post-authorization subdivision proposal.

Georgia law draws a deliberate line among single-family, multi-family, and community docks. The single-family exemption, O.C.G.A. § 12-5-295(7), exempts from Coastal Marshlands Protection Act ("CMPA") permitting a private dock built "exclusively for the noncommercial use of the owner or his or her invitees" by the owner of a lot on which a detached single-family residence is located, or a comparable lot suitable for one. Because such a dock is exempt, it does not undergo the CMPA permitting and public-review process applicable to nonexempt marshlands projects.

The multi-family exemption, O.C.G.A. § 12-5-295(7.1), exempts a single shared dock serving up to four adjoining riparian lots, but only if each owner records "a binding covenant that runs with the land, in favor of the state," prohibiting any future private dock on the lot unless the shared dock is removed or converted to a single-family dock. A dock that instead serves as a subdivision or community recreational amenity is a "community dock" under Ga. Comp. R.

& Regs. r. 391-2-3-.03(2)(e) and is subject to CMPA permitting, public notice, and the review procedures applicable to that type of facility.

The proposed rules include several provisions relevant to this distinction. Proposed Rule 391-2-1-.02(20) defines a private dock as one meeting either the single-family or multi-family statutory exemption. Proposed Rule 391-2-1-.03(2)(b) provides that a license may be issued only to the owners of the riparian parcels to be served. Proposed Rule 391-2-1-.08(9) makes the application and supporting documents conditions of the license and prohibits a change or deviation without prior notice and written CRD approval or a new license. Proposed Rule 391-2-1-.09 authorizes CRD to revoke, suspend, modify, or deny a license for failure to comply with the rules or license conditions.

Those provisions establish CRD's general authority, but they do not identify when a subdivision proposal must be disclosed, whether dock construction may continue while the proposal is evaluated, or whether CRD must issue a written determination classifying the proposed use. Nor do they specify whether a license provision stating that a violation "will result in immediate revocation" is self-executing or instead requires further agency action.

The need for a clearer and more effective rule is illustrated by CRD's authorization of a private dock on Cumberland Island. In 2015, CRD authorized Lumar, LLC to construct a private, single-family recreational dock to serve an undeveloped 87.5-acre parcel. CRD File No. PRD20150110. Condition 7 stated that use of the dock for any purpose other than a private, single-family recreational dock, without prior notice to and approval from CRD, "will result in immediate revocation" of the license and voiding of the authorization. After receiving the authorization—and before beginning construction—the applicant sought local approval to subdivide the upland parcel into ten lots. The dock was under construction when CRD was notified of the subdivision application and its potential implications for the authorized single-family use. CRD did not suspend or revoke the authorization, construction continued, and the dock was completed.

CRD plainly had the authority to act — the 2015 authorization reserved the power of "immediate revocation" for any non-single-family use. But by the time it could be invoked, the applicant had already applied to subdivide, and the dock was under construction, and it was completed without CRD suspending or revoking the license. CRD's general revocation authority did not prevent construction from proceeding after CRD learned that the applicant was seeking approval to subdivide the property into ten lots. Condition 7 did not expressly establish whether the subdivision application itself triggered review, whether construction had to stop while CRD evaluated the matter, or whether revocation occurred automatically or required a written CRD decision. The proposed rules should resolve those issues.

III. Recommended amendments.

A CMPA-exempt private dock still requires the State's permission to occupy state-owned tidal water bottoms. Proposed Rule 391-2-1-.02(22) provides that a revocable license may be conditioned and revoked, is not coupled with an interest, and is not transferable. Proposed Rules 391-2-1-.08(9) and (17) likewise authorize application-based and special conditions. CRD therefore has authority to require disclosure and review of events that may cause a dock to cease qualifying for the exemption under which its license was issued.

A. Require disclosure and suspend construction pending a written determination.

The Department should add a new subsection to Rule 391-2-1-.08, substantially as follows:

(18)(a) A revocable license for a single-family dock authorizes construction and use of the dock only in connection with the single riparian parcel and detached single-family residence, or qualifying lot suitable for one, identified in the application. Subdivision of the licensed parcel does not confer dock-access rights upon any newly created parcel.

(b) The licensee shall notify the department in writing no later than the date on which the licensee, or a person acting with the licensee's authorization, files an application seeking approval to subdivide the licensed parcel. The licensee also shall notify the department before recording a subdivision plat affecting the licensed parcel; granting an easement, covenant, or other dock-access right to another parcel; or advertising, depicting, or designating the dock as an amenity for more than one residence or parcel.

(c) If an application to subdivide the licensed parcel is filed before construction of the dock is complete, authorization to begin or continue construction shall be suspended by operation of this rule until the department issues the written determination required by subparagraph (d). If the dock has been completed, no right of access may be granted, advertised, or exercised on behalf of another parcel or residence pending that determination.

(d) After receiving notice and any reasonably necessary supporting information, the department shall determine in writing whether the dock remains eligible for construction and use as a single-family dock; may be authorized as a multi-family dock under O.C.G.A. § 12-5-295(7.1); requires CMPA authorization as a community dock; or requires modification, suspension, or revocation of the existing license. The determination shall state whether and when construction may commence or resume and identify any additional authorization required.

(e) A single-family dock may not be granted, advertised, designated, or made available as providing water access to another parcel or residence unless the department has issued the authorization applicable to that use.

(f) Nothing in this subsection restricts use of a single-family dock by the owner's bona fide social invitees in connection with the licensed residence.

A temporary suspension preserves the status quo while CRD determines whether the subdivision would affect the dock's qualifying use, but it does not assume that every subdivision necessarily converts the dock to a multi-family or community use. The license might remain tied exclusively to one resulting riparian parcel. That determination should be made before construction is completed, not after the structure is already in place.

The rule also should establish a reasonable deadline for CRD's written determination so that a temporary suspension does not continue indefinitely. A period such as 30 days after receipt of the required information would give CRD time to review the proposal while providing certainty to the licensee.

B. Require disclosure in the application and continuing supplementation.

Proposed Rule 391-2-1-.03(1) should require an applicant to disclose:

1. Any pending or contemplated subdivision, rezoning, variance, or development application affecting the parcel to be served;
2. The number and identity of all existing or proposed parcels and residences intended to receive dock access;
3. Any proposed subdivision plat, easement, covenant, homeowners-association right, sales representation, or other arrangement concerning use of the dock; and
4. Whether the dock will be depicted, advertised, or offered as a subdivision or community amenity.
5. The application should include a certification that the dock is not intended to serve any undisclosed parcel or residence. It should also impose a continuing duty to supplement the application if that information changes before or during construction. Rule 391-2-1-.08(9) can function effectively only if an applicant must disclose material changes occurring after the original application was approved.

C. Require recorded notice of the single-family limitation.

The Department should require the applicant to record a memorandum of the license in the county real-property records. The memorandum should state that:

1. The license authorizes construction and use of the dock only in connection with the qualifying single-family parcel and residence identified in the application;
2. Subdivision of the property does not confer dock-access rights upon newly created parcels;
3. The license is not transferable upon a change in ownership without issuance of a new license; and
4. Additional-lot, multi-family, subdivision, or community use requires prior CRD authorization and, where applicable, a CMPA permit.

D. Clarify the effect of suspension and revocation under Rule 391-2-1-.09.

Rule 391-2-1-.09 should expressly provide that:

1. Failure to provide the required subdivision or change-in-use notice is a violation;
2. Beginning or continuing construction during the temporary suspension is a violation;
3. Granting, advertising, or exercising additional-lot access without the required authorization is a violation;
4. CRD shall promptly provide written confirmation when a temporary suspension arises and direct that construction cease;
5. Any final modification or revocation must be stated in a written order identifying its effective date and any required removal, restoration, or corrective action; and

6. CRD shall act before construction resumes when the information before it presents a reasonable question whether the dock remains eligible as a single-family dock.

These provisions would eliminate the uncertainty created by a condition stating that an unauthorized use “will result in immediate revocation” without explaining whether revocation occurs automatically, whether CRD must issue an order, or whether construction may continue in the meantime. The rule should make the temporary suspension self-executing, while requiring a written CRD decision before final revocation, modification, or reclassification.

IV. The rules should identify the review path applicable to each proposed use.

Continued single-family use. A subdivision does not require revocation if the dock remains exclusively associated with one qualifying riparian parcel and residence and no rights of access are created for other parcels. CRD should confirm that conclusion in writing before construction begins or resumes.

Multi-family use. If the proposed use would qualify under O.C.G.A. § 12-5-295(7.1) as a shared dock serving no more than four adjoining riparian lots, the owners should be required to obtain a new revocable license and record the covenant required by that exemption.

Community use. If the dock would serve as a subdivision or community recreational amenity, it should be processed as a community dock under the CMPA and Ga. Comp. R. & Regs. r. 391-2-3-.03, including the applicable public notice, Committee consideration, and hearing procedures. The rules should require the same process that would have applied had the proposed community use been disclosed before the single-family authorization was issued.

Definitions and coordination. The Department should add a definition of “single-family dock” tying the term to the single riparian parcel and qualifying detached residence or lot served. The rules also should state that a private dock licensed under Subject 391-2-1 may not be used as the subdivision or community recreational amenity regulated by Rule 391-2-3-.03 without the authorization required by that rule.

V. The requested provisions would not regulate upland development.

The recommended amendments would not regulate zoning, prohibit subdivision, or determine how an owner may develop upland property. They would govern only the continued validity and exercise of the State’s permission to construct and maintain a structure over state-owned tidal water bottoms.

An owner would remain free to seek subdivision approval under applicable local law. But the filing of that proposal may materially affect the factual basis upon which CRD authorized construction of a single-family dock. CRD may therefore require notice, suspend construction over state property while it reviews the proposal, and determine whether the proposed dock use remains eligible for the original license.

The rulemaking package states that the Commissioner or the Commissioner’s designee has authority to grant, deny, modify, and revoke revocable licenses for the use of state-owned tidal water bottoms. The proposed rules themselves provide that a license may be conditioned and revoked and that the application materials become conditions of the license. Requiring timely disclosure and review is therefore an exercise of CRD’s licensing authority over state property, not an attempt to exercise local zoning jurisdiction.

VI. Conclusion.

Lumar, LLC's dock on Cumberland Island demonstrates that recognizing CRD's authority to revoke a license after an unauthorized change is not enough. Although the 2015 authorization expressly threatened immediate revocation for non-single-family use, construction proceeded to completion after CRD received notice that the applicant was seeking approval to subdivide the served property into ten lots. The authorization did not establish that a subdivision application would trigger CRD review, require construction to stop while that review was pending, or obligate CRD to issue a written determination before construction resumed.

The proposed rules should close that procedural gap. They should require disclosure when subdivision or shared use is proposed, temporarily suspend incomplete construction, require CRD to issue a written classification decision, and prohibit the creation or exercise of additional-lot access rights until the authorization applicable to the actual proposed use has been obtained. Those protections would preserve the integrity of the single-family exemption without restricting legitimate subdivision or ordinary use of a dock by an owner and the owner's social invitees.

We urge the Board to adopt the provisions stated above and to defer any enlargement of authorized walkway dimensions until the resource justification, shading limits, and monitoring described in Part I are prepared, publicly reviewed for comment, and implemented accordingly.

We appreciate your diligent consideration of these comments.

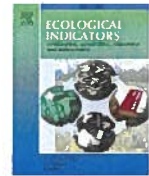
For the Future of Georgia's Coast,

A handwritten signature in blue ink, appearing to read "David Kyle", is positioned above the organization's name.

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A rapid method to assess salt marsh condition and guide management decisions

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ABSTRACT

Salt marshes are increasingly vulnerable to degradation and loss from accelerating sea-level rise and other pervasive disturbances, spurring a need for broad, science-based information to guide management. The Salt Marsh Rapid Assessment Method, MarshRAM, was designed to address this need by documenting information characterizing salt marsh type, setting, ecological value, disturbance, integrity, and opportunity for landward migration at the site scale. We used the method to collect information from onsite and remote observations of thirty-one (31) salt marshes in Rhode Island, USA. MarshRAM's *Wetland Disturbance Index* is a checklist that ranks the intensity of individual and cumulative human disturbances, while the *Index of Marsh Integrity* (IMI) is generated using a novel walking-transect approach to rapidly characterize site-wide vegetation-community composition. The IMI was designed to reflect ecological response to direct disturbances and inundation stress, and our finding that IMI strongly correlates with cumulative disturbance + marsh platform elevation indicates it works as intended. A strong correlation between IMI components and historic marsh loss suggests that salt marsh community cover can also serve as an indicator of salt marsh resilience. Our study marshes diverge from accounts of historic New England salt marsh conditions in that meadow high marsh species no longer dominate the high marsh zone, *Spartina alterniflora* is now the dominant high marsh species, and severe edge erosion and invasion by *Phragmites australis* are ubiquitous. We demonstrate how MarshRAM data can be analyzed to inform restoration and conservation strategies and policy decision-making. For example, our findings suggest that inundation stress is strongly impacting marsh platform integrity, high-marsh vegetation loss is a strong indicator of degradation and vulnerability, and unassisted landward marsh migration may already be promoting resilience to inundation stress. We suggest adapting MarshRAM to meet the management needs of other regions or broader applications.

1. Introduction

Salt marshes are valuable to people and wildlife but are highly vulnerable to human disturbances. They are among the most productive ecosystems on earth, providing food and habitat for numerous species (Nixon 1980, Deegan et al., 2002, Gedan et al., 2009, Barbier et al., 2011), absorbing floodwater and wave energy to protect coastal properties (Shepard et al., 2011), and providing recreational opportunities and natural viewsheds. In developed regions, human disturbances, such as filling, hydrologic alterations, excessive nutrient loading, and invasive species have led to widespread salt marsh degradation and loss (e.g., Gedan et al., 2009, Gedan et al., 2011, Crotty et al., 2017, Wigand et al.,

2014). More recently, inundation stress associated with accelerating sea-level rise has emerged as a key contributing factor to marsh degradation and loss, as evidenced by changes and declines of plant species composition and cover, and increases in unvegetated habitat and open water throughout northeastern US salt marshes (Donnelly and Bertness, 2001, Raposa et al., 2017b, Roman, 2017, Watson et al., 2017, Payne et al., 2019) and elsewhere, globally (Cahoon and Reed, 1995, Kirwan and Megonigal, 2013).

The many stressors facing salt marshes pose a challenge for management and conservation, requiring comprehensive science-based information capable of characterizing ecological status across various hydrogeomorphic settings and disturbance regimes. Salt marsh

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managers need to consider stress caused by multiple individual and cumulative human disturbances, response variability inherent in marsh type or setting, and the ecosystem functions and services that may be at risk from existing stressors and potential intervention actions. With sea-level rise simultaneously threatening marsh sustainability at broad spatial scales, managers may need to prioritize specific salt marshes where intervention actions are warranted, focusing on those that are most vulnerable, have the greatest potential for recovery, or offer the greatest value of ecosystem services. In this context, understanding the potential for landward migration at the site scale may help managers recognize to what extent conservation or alteration of adjacent lands may promote marsh sustainability. To evaluate this suite of possibilities for numerous marshes across a region, an efficient assessment method that can integrate diverse information could be a valuable tool for managers.

The Salt Marsh Rapid Assessment Method (MarshRAM), presented in this paper, provides managers with a single, comprehensive, efficient method to document and classify information on salt marsh physical and biological attributes, ecosystem functions and services, geomorphic and landscape setting, human disturbances, integrity and vulnerability, and landward migration potential. We designed MarshRAM to capture reliable site-level information in a single site visit, allowing numerous sites to be compared against each other or categorized based on condition, value, or other attributes (Fennessy et al., 2007). MarshRAM was developed and tested in Rhode Island, USA, but was designed with a format that can be adapted to salt marshes across broader geographic regions. The goal of this paper is to describe and evaluate MarshRAM, focusing on its ability to support salt marsh management.

2. Methods

2.1. MarshRAM overview and study design

MarshRAM builds on the New England Rapid Assessment Method (NERAM; Carullo et al., 2007, Wigand et al., 2011) and the Rhode Island Salt Marsh Assessment (RISMA; Ekberg et al., 2017), which were designed to characterize human disturbances and marsh-platform integrity, respectively. MarshRAM has six integrated parts, including checklists of observable characteristics and condition indicators, and models that estimate the condition of the marsh and its surrounding landscape. MarshRAM produces five indices reflecting (1) ecological and cultural value, (2) surrounding landscape condition, (3) the intensity of human disturbances, (4) marsh platform integrity, and (5) landward migration potential. We conducted MarshRAM at thirty-one (31) Rhode Island salt marshes (Fig. 1) in 2017 and 2018 during the peak of the growing season (mid-July through September). Data collection consisted of field and office components following the MarshRAM User's Guide (Kutcher, 2021) and using a dedicated field datasheet (Appendix A), as described below.

2.1.1. Observational checklists and models

Onsite and remotely-sensed observations are used to assess marsh characteristics, ecosystem functions and services, surrounding land use, and wetland disturbances. The *Marsh Characteristics* component documents, by discrete checklist categories, marsh area, position in the watershed, geomorphic setting and type, tide range, hydrology, edge exposure, and habitat diversity. This information helps categorize marshes by type and setting, which may affect analyses of how marshes respond to stressors. *Ecosystem Functions and Services* is used to estimate and rank the occurrence and importance of 12 ecosystem functions and services commonly cited in the literature (e.g. U.S. ACE, 2003), and the sum of those ranks is used as an aggregate measure of ecological and social value. As an opportunistic supplement to assessing ecosystem function, marsh-dependent and facultative birds are identified and tallied as they are observed when approaching sections of the marshes for the first time.

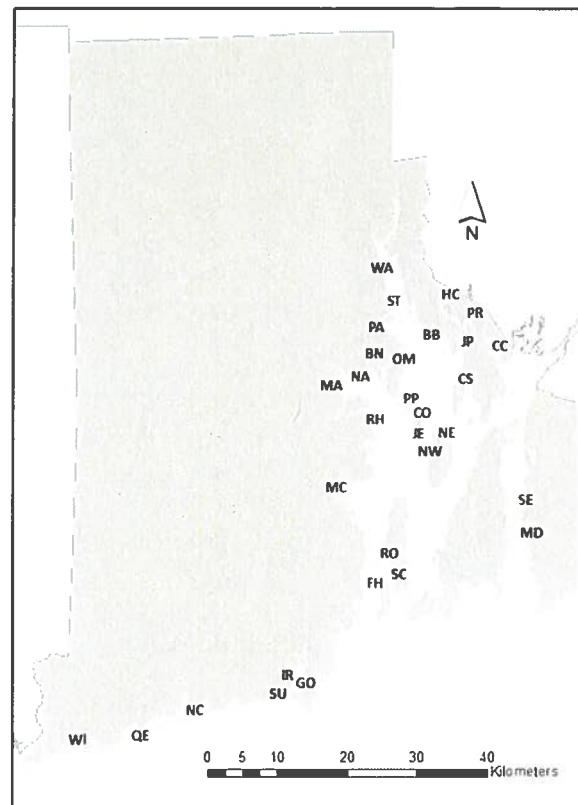


Fig. 1. Distribution across Rhode Island, USA, of 31 salt marshes assessed in 2017 and 2018 using MarshRAM. Refer to Table 2 for site codes.

Surrounding Land Use uses photointerpretation of recent aerial photography and field verification to estimate the proportion and intensity of human land uses within 150 m of the marsh-upland edge. Surrounding landscape integrity metrics are commonly applied in rapid assessments as coarse-but-reliable indicators of aggregate human disturbance (Fennessy et al., 2007), and prior studies have shown a strong relationship between wetland condition and surrounding land use (Bried et al., 2013, Kutcher and Bried, 2014, Kutcher and Forrester, 2018).

Wetland Disturbances estimates, categorizes, and ranks the intensity of 30-m buffer disturbances, tidal restriction, ditching and draining, anthropogenic nutrient inputs, filling and dumping, edge erosion, marsh crab burrowing, platform vegetation die-off, vegetation removal and soil disturbances, and the cover of invasive *Phragmites australis* as detailed in the field datasheet (Appendix A). *Wetland Disturbances* adapts observational NERAM metrics found to be effective in reflecting salt marsh platform condition in southern New England (Wigand et al., 2011), and adds metrics to assess crab-burrow density and edge erosion, which are degradation features thought to be related to recent inundation stress (Crotty et al., 2017, Ganju et al., 2017, Raposa et al., 2018). Ranking of intensity is coarse for most metrics (i.e., None, Low, Moderate, and High intensity level) to promote consistency among users. Additionally, checklists are included with most metrics for identifying specific and categorized sources of stress to support policy analysis.

We collected information for these components in the field and the office from direct observations, available reports, publications, and data, and through analysis of recent aerial images. To assess inter-user variability when completing the observational checklist parts of MarshRAM, two investigators separately completed the observational sections at

nine marsh sites. In all cases, both investigators had been trained to understand the method and interpretation of all metrics.

2.1.2. Marsh community composition and Index of marsh integrity

This MarshRAM component adapts elements of RISMA (Ekberg et al., 2017) and floristic quality assessment (e.g., Bourdaghs et al., 2006), uses a novel sampling approach to estimate the relative abundance of typical salt marsh community cover types (*Marsh Community Composition*), and generates a biological index of salt marsh integrity (*Index of Marsh Integrity*, hereafter IMI). The relative proportion of marsh cover types typical in New England (Table 1) is quantified using eight transects traversing the marsh platform from the marsh-upland interface to the

Table 1

Salt marsh community cover types (modified from Ekberg et al., 2017) and coefficients of community integrity (CCI) used to generate indices of marsh integrity (IMI) for 31 salt marshes in Rhode Island. CCI values indicate a gradient of low (0) to high (10) integrity. Cover types are listed in approximate order from upland interface to seaward edge, followed by typically less abundant features.

Marsh Habitat	CCI	Description
<i>Salt Shrub</i>	9	Infrequently flooded shrub community (>30% shrub cover) located at higher elevations on the marsh platform and at the upland interface; typically dominated by <i>Iva frutescens</i> , <i>Baccharis halimifolia</i>
<i>Brackish Marsh Native</i>	10	Emergent community where freshwater from the watershed dilutes infrequent flooding by seawater; typically dominated by non-halophytic, salt tolerant vegetation such as <i>Typha angustifolia</i> , <i>Schoenoplectus robustus</i> , <i>Spartina pectinata</i>
<i>Phragmites</i>	3	Areas where the invasive common reed <i>Phragmites australis</i> cover > 30%
<i>Meadow High Marsh</i>	10	Irregularly flooded emergent high marsh community dominated by any combination of <i>Spartina patens</i> , <i>Juncus gerardii</i> , <i>Distichlis spicata</i> ; <i>S. alterniflora</i> absent
<i>Mixed High Marsh</i>	7	Irregularly flooded emergent high marsh community comprised of any combination of <i>S. patens</i> , <i>Juncus gerardii</i> , <i>Distichlis spicata</i> ; <i>S. alterniflora</i> present
<i>Sa High Marsh</i>	5	Irregularly flooded emergent high marsh; typically monoculture of <i>S. alterniflora</i> , although <i>Salicornia</i> sp. may be present
<i>Dieoff Bare Depression</i>	1	Shallow gradual depression on marsh platform, irregularly flooded by tides but typically remaining flooded or saturated to the surface throughout the tide cycle; <30% vascular vegetation cover, or bare decomposing organic soil, typically with remnant roots of emergent vegetation; may have algal mat, filamentous algae, wrack, or flocculent matter present
<i>Low Marsh</i>	8	Regularly flooded, typically sloping emergent community located at the tidal edges of the marsh and dominated by tall-form <i>S. alterniflora</i>
<i>Dieback Denuded Peat</i>	0	Typically non-depressional marsh platform feature; marsh peat is exposed (vegetation < 30%) and perforated from grazing, crab burrowing, and erosion; typically at or near tidal edge
<i>Natural Panne</i>	8	Shallow steep-sided depression on marsh platform with clearly defined edge; irregularly flooded, typically dry at low tide; species may include any cover of <i>Plantago maritima</i> , <i>Suaeda maritima</i> , <i>Salicornia</i> sp., <i>J. gerardii</i> , <i>Aster</i> sp.
<i>Natural Pool</i>	6	Shallow steep-sided depression on marsh platform with clearly defined edge; irregularly flooded by tides but typically remaining flooded throughout the tide cycle; organic or sandy substrate lacking emergent vegetation and roots but may support <i>Ruppia maritima</i>
<i>Natural Creek</i>	8	Narrow, natural, unvegetated, regularly-flooded or subtidal feature cutting into the marsh surface; typically sinuous
<i>Ditch</i>	2	Manmade ditches and associated spoils on the marsh surface; typically linear
<i>Bare Sediments</i>	4	Irregularly or infrequently flooded; sandy or gravelly sediments on the marsh surface with < 30% vegetation cover; typically from recent washover event or elevation enhancement project

subtidal zone of a major water feature (bay, salt pond, major creek). Using the field maps as a guide, community types are sampled by walking each transect using repeatable, even paces. For every step across the marsh surface, the dominant cover type traversed is tallied as a single data point (Appendix A, Section E). For example, twelve steps through a salt shrub zone would be tallied as twelve *Salt Shrub* data points for analysis. The relative abundance of each cover type is then derived from the aggregate tallies of each type across all transects. The aim of this 'walking-transect' sampling approach is to efficiently and accurately characterize marsh community composition by estimating the relative abundance of the various marsh cover types across the marsh surface. Because the aim of the walking-transect approach is deriving relative abundance, step-length is inconsequential as long as it is consistent throughout the survey.

IMI assigns a coefficient to each salt marsh cover type based on its perceived indication of marsh degradation and habitat value. These *Coefficients of Community Integrity* (or CCI) were estimated through the consensus of a team of experienced salt marsh scientists using a standardized scoring system that rates each cover type by sensitivity to inundation and other stressors, and habitat value (Appendix B). Cover types with high sensitivity to stress and high habitat value were assigned coefficients approaching or equal to ten (10), whereas cover types indicative of stress and with lower habitat value were assigned coefficients approaching or equal to zero (0) (Table 1). For example, *Meadow High Marsh* was judged to be highly sensitive to both inundation stress and direct human disturbances, and to have high habitat value; this habitat was therefore assigned a coefficient of 10. In contrast, *Dieback Denuded Peat* was judged to be the outcome of stress and to have low habitat value; it was therefore assigned a coefficient of 0. The mean of the coefficients of all cover types, weighted by relative proportion of each type across all transects, constitutes the IMI, as below, where T_i (total tally) = the number of steps in each community type, tallied across all transects.

$$IMI = \frac{\sum(CCI \times T_i)}{\sum T_i}$$

We conducted the community composition sampling following transects drawn on field maps of recent aerial photography with the initial transect located from a random point and the remaining transects evenly spaced from the initial transect to span the entire marsh (Kutcher, 2021). We treated areas covered by wrack as the community type beneath the wrack at the time of the survey. As opportunistic information to supplement ecosystem-functions assessment, marsh-obligate sparrows (*Ammodramus* spp.) flushed while walking the transects were tallied to produce a coarse measure of sparrow density.

To test the precision of the *walking-transect* method across community types and users, the consistency of step-length and its effects on community-composition ratios and IMI scoring were evaluated for *Salt Shrub*, *Mixed High Marsh*, and *Phragmites* community types. Two investigators of varying step-length each walked transects of 20 steps across each community type, and the distance traversed was measured. This was replicated across five separate transects in each community type, and variability among the replicates and community types was analyzed for each investigator. Traversed distances were further applied to calculate relative proportions of each community type and IMI scores, for comparison against theoretical IMI scores that would result from taking perfectly-even steps across the various types.

2.1.3. Migration potential

The *Migration Potential* component (Appendix A, Section F) is designed to rapidly estimate and characterize landward marsh migration potential using a combination of remote-sensing data and field observations. This component evaluates geomorphic (e.g., slope and elevation), hydrologic (water features), vegetation-type (forested, grassland, etc.), and land-use (e.g., development type) features within a 60-m upland buffer from the marsh upland edge (to coincide with State

of Rhode Island management authority of 200 feet). Information on the corridor condition is derived from interpretation of aerial imagery overlaid with high-resolution elevation data displaying 1-ft (30.5-cm) contours. Remote assessments are evaluated during the field surveys and adjusted if necessary. We used ESRI ArcMAP GIS software to generate and determine the area of sixty-meter buffers around each salt marsh assessment unit, and used the 5ft contour (approximately 1.5 m above mean high water) of the *RIGIS Contour Lines-2011 Statewide LiDAR* (available at <https://www.rigis.org>, accessed July-Sept 2018) to identify low-lying lands.

Migration Potential uses a preassigned coefficient of migration potential for each prescribed land-cover/elevation type. The coefficients range from zero (no migration potential) to 10 (high potential), based on the best professional judgement of a group that included salt-marsh scientists, restoration practitioners, and government regulators. For example, elevated developed land was judged to have no migration potential (0), whereas low-lying active farmland was judged to have moderate potential (5), and low-lying abandoned farmland was judged to have high migration potential (10). The *Migration Potential* score uses the weighted average of those coefficients to characterize the relative potential of land abutting the wetland to support landward migration. Two additional metrics are also estimated: *Migration Area*, defined as the area of surrounding land with moderately-high and high migration potential (i.e., land that would require little or no management action to facilitate migration), and *Replacement Ratio*, which relates *Migration Area* to the area of the existing marsh (estimating what proportion of the marsh might persist without intervention). These site-scale migration metrics can be used in conjunction with higher-resolution, regional-scale migration data, such as those produced using a Sea Level Affecting Marshes Model (Warren Pinnacle Consulting, Inc.), to inform management planning.

2.1.4. MarshRAM scoring

MarshRAM generates two separate condition indices reflecting marsh disturbances (*Wetland Disturbance Index*) and marsh integrity (IMI) (Appendix A). Scores for each metric and index range from 0 to 10, where scores approaching 10 indicate no observed indications of disturbance or degradation, and scores approaching zero indicate severe disturbance or degradation. The *Ecosystem Functions and Services*, *Migration Potential*, and *Surrounding Land Use* metrics are not incorporated into the MarshRAM condition indices, but are instead designed to be interpreted in conjunction with the disturbance and marsh integrity scores to inform management decisions. MarshRAM keeps size, setting, diversity, functions and services, and migration potential information separate from disturbance and integrity scoring because some of the former factors are inherent and can confound the effective assessment of wetland condition (Fennessy et al., 2007, Kutcher and Forrester, 2018).

2.2. Data analysis

We used Winstat (R. Fitch Software, 2008) for statistical analyses, except where noted. Pearson correlation was used to analyze IMI against MarshRAM tally data and surrounding land use data, and historic loss, elevation, and cover data from prior studies (Berry et al., 2015, Ekberg et al., 2017, Watson et al., 2017). Spearman rank correlation was used to detect correlations of IMI and its components with MarshRAM observational data to compensate for the ordinal nature of the observational metrics. Kruskal-Wallis H-test was used for inter-user variability analysis of the walking transects where assumptions could not be met for ANOVA analysis. We used Bonferroni adjustment of the alpha value in analyses where multiple comparisons increased the probability of an erroneous positive outcome. IBM SPSS Statistics (IBM Corporation) multiple regression analysis was used to test for interactive and additive effects of disturbance and median marsh elevation on IMI.

3. Results

3.1. MarshRAM logistics

Each MarshRAM assessment took one investigator and a field assistant a single day or less to complete. Office-based preparation of field maps and GIS investigations took less than one hour per marsh, and field surveys generally took between two and five hours, depending on the size of the site and difficulty in traversing the transects and perimeter of the marsh. Community-type transects ranged in length from 10 m to 417 m ($n = 248$, $\bar{x} = 108$) and averaged 861 m total per eight transects per marsh (range = 123 to 2200 m), and the number of data points tallied (i.e., the number of steps traversed during transect surveys) averaged 973 per marsh.

3.2. Marsh characteristics and stressors

Study marshes ranged in size from 0.6 to 93 ha ($n = 31$, $\bar{x} = 14.8$) and were distributed across back-barrier marsh (10 sites), open embayment (8), valley marsh (6), coastal lagoon (4), and open estuarine coast (3) geomorphic settings. The tidal water of 28 sites was polyhaline (>18 ppt.), one was mesohaline (5–18ppt.), and two were not measured for salinity. All sites were interpreted as having potential or evident value as wildlife habitat, fish and shellfish habitat, and carbon storage, and 17 were characterized as having potential or evident value for storm protection of property. The most common stressors in the surrounding landscape within the 150 m buffer were residential development (27 of the 31 sites), raised roads (19 sites), trails (11 sites), and recreational development (10 sites).

3.3. MarshRAM Index values

Wetland Disturbance Index scores ranged from 4.2 to 8.1 ($\bar{x} = 6.3$, $SD = 0.91$), and IMI scores ranged from 4.4 to 8.0 ($\bar{x} = 6.2$, $SD = 0.96$) (Table 2). IMI scores reflect relative community composition as depicted in Fig. 2. *Meadow High Marsh*, *Dieoff Bare Depression*, *Salt Shrub*, and *Natural Pool* most strongly influenced the IMI scores (Table 3). Lower-quartile IMI scores ranged from 4.5 to 5.5 and upper-quartile scores ranged from 6.9 to 8.1; these were used to assign categories of degradation in Table 4, which demonstrates a decision-support matrix relating the IMI categories to observed disturbance intensities and other management information. *Migration Area* ranged from 0.0 to 12.6 ha ($n = 31$, median = 2.5, $\bar{x} = 3.4$, $SD = 3.3$), and *Replacement Ratio* ranged from 0.0% to 136% (median = 25%, $\bar{x} = 35\%$, $SD = 34\%$).

3.4. Analysis of MarshRAM properties

IMI was modestly correlated with median marsh platform elevation (+) and weakly correlated with the *Wetland Disturbance Index* (+), but together, elevation and *Wetland Disturbance* had a strong additive influence on IMI (Table 5), and there was no indication of interaction between those two variables ($P = 0.781$). IMI was negatively correlated with the historic loss of vegetated marsh area reported by Berry et al. (2015), and the combined cover of *Meadow High Marsh* (–) and *Die-off Bare Depression* (+) predicted 79% of historic loss (stepwise regression, $F(2, 7) = 13.09$, $P = 0.004$, $R^2 = 0.79$, $R^2_{adj} = 0.73$). In contrast, the *Wetland Disturbance Index* was not correlated with historic loss values (Pearson, $P > 0.05$). IMI was correlated with the MarshRAM observational metric *ponding and dieoff depressions* (+) (Spearman Rank, $r_s = 0.52$, $P = 0.002$, $n = 31$) but not with any other individual *Wetland Disturbance* metric ($P > Bonferroni-adjusted \alpha$ of 0.005).

The % cover of *Meadow High Marsh* decreased with increasing cover of *Sa High Marsh* (Pearson, $r = -0.54$, $P < 0.001$, $n = 31$), and both *Meadow High Marsh* and *Sa High Marsh* decreased with increasing cover of *Phragmites* ($r = -0.54$, $P < 0.001$, $n = 31$ and $r = -0.54$, $P < 0.001$, $n = 31$, respectively). The cover of *Phragmites* was also correlated with the

Table 2

Site codes, MarshRAM index scores, marsh loss, and median elevation of 31 RI salt marshes. IMI and *Wetland Disturbance* scores span a 0–10 scale, where scores approaching 10 indicate little or no observed disturbance or marsh degradation, and scores approaching zero indicate multiple, strong observations of disturbance and degradation.

Site	Code	Wetland Disturbance	IMI	% Loss ¹	Median Elevation ²
Barrington Beach	BB	5.9	5.7	ND	0.74
Brush Neck Cove	BN	7.5	6.6	ND	0.29
Chase Cove	CC	6.4	7.8	ND	0.69
Coggeshall	CO	6.6	6.1	ND	0.62
Colt State Park	CS	5.3	6.9	ND	0.70
Fox Hill	FH	7.7	6.7	5.9	0.45
Galilee Outer	GO	6.5	5.9	ND	0.60
Hundred-acre Cove	HC	6.0	6.5	8.9	0.59
Island Road North	IR	6.1	5.5	ND	0.49
Jacob's Point Outer	JP	5.7	7.9	ND	0.70
Jenny	JE	6.2	5.9	ND	0.53
Mary Donovan	MD	5.9	6.4	ND	0.33
Mary's Creek	MA	4.2	5.3	ND	0.54
Mill Creek	MC	7.3	7.2	ND	0.53
Nag East	NE	5.9	6.0	ND	0.64
Nag West	NW	6.4	6.1	ND	0.64
Nausauket	NA	7.4	5.9	ND	ND
Ninigret Control	NC	7.3	5.6	12.9	0.09
Old Mill Cove	OM	5.3	5.3	ND	0.38
Palmer River	PR	6.1	6.0	1.7	0.56
Passeonquis	PA	6.1	7.1	ND	0.75
Providence Point	PP	8.1	7.8	ND	0.64
Quonnie East	QE	5.5	4.6	21.2	0.23
Rocky Hill	RH	6.3	6.3	5.5	0.55
Round	RO	6.5	6.1	9.3	0.54
Seapowet	SE	4.8	4.9	10.6	0.65
Sheffield Cove	SC	7.4	8.0	ND	ND
Stillhouse Cove	ST	4.9	6.9	ND	0.57
Succotash	SU	5.7	5.3	11.3	0.30
Wachemoket	WA	5.7	4.4	ND	0.40
Winnapaug	WI	7.1	4.7	26.7	0.13

¹ Annualized loss of vegetated marsh area from 1981 to 2008 estimated using aerial photo-interpretation, derived from Berry et al. (2015);

² median elevation relative to NAVD88 from Watson et al. (2017); ND = no data available.

MarshRAM observational metric *anthropogenic nutrient inputs* ($r_s = -0.48$, $P = 0.003$, $n = 31$) but not with *filling and dumping*, *buffer encroachment*, or *Surrounding Land Use* ($r_s > Bonferroni$ -adjusted α of 0.007).

The linear density (sparrows/m) of marsh-obligate sparrows flushed during IMI transects was not correlated with the *Wetland Disturbance Index*, IMI, or any singular observational disturbance metric, but a positive association of sparrow linear density with the number of ditch data points tallied along the transects was significant (Pearson, $r = 0.58$, $P < 0.001$, $n = 31$) considering a Bonferroni-adjusted α of 0.002.

The sum of ranks ascribed to *Ecosystem Functions and Services* was correlated with marsh area ($r_s = 0.59$, $P = 0.0003$, $n = 31$), but not with *Wetland Disturbance* or IMI ($P > Bonferroni$ -adjusted α of 0.013 for both). Marsh area was not correlated with % historic loss (Berry et al., 2015), median elevation (Watson et al., 2017), MarshRAM *natural habitat diversity*, IMI, or the *Wetland Disturbance Index* ($P > Bonferroni$ -adjusted α of 0.007 for all).

Migration Potential was strongly correlated with *Buffer Encroachment* scores (Pearson, $r = 0.66$, $P < 0.001$, $n = 31$) but only weakly associated with *Surrounding Land Use* (Pearson, $r = 0.35$, $P = 0.056$, $n = 31$), both of which decrease with increased disturbance. *Replacement Ratio* was inversely correlated with historic loss values (Pearson, $r = -0.66$, $P = 0.039$, $n = 10$).

3.5. Inter-user variability analysis

No differences were detected between investigators assessing the *Wetland Disturbance Index* (dependent *T*-test, $T = -1.2$, $P = 0.26$, $n = 9$), the sum of *Ecosystem Functions and Services* ranks ($T = -0.13$, $P = 0.90$, $n = 9$) or any of the component metrics/ranks of either index (dependent *T*-test, $P > 0.05$ for all that met statistical criteria; those not meeting criteria were identically-scored across sites by users). Mean inter-user differences for the *Wetland Disturbance Index* were $< 3\%$ of the potential metric range of 10, and for the sum of *Ecosystem Functions and Services* ranks, mean differences were 6% of the potential range of 36.

Likewise, no differences were detected in the length of walking-transect steps across three structurally-distinct community types (*Salt Shrub*, *Meadow High Marsh*, *Phragmites*) for each of two investigators (Kruskal-Wallis *H*-test, $n = 3 \times 5$; $H = 4.2$, $P = 0.117$ for User 1 and $H = 4.1$, $P = 0.127$ for User 2). The two users had different overall step lengths (Mann-Whitney *U* test, $Z = -2.6$, $P = 0.009$), but because IMI is based on relative cover, inter-user variability of IMI values generated using the measured step lengths was $< 1\%$ of the IMI range (0–10).

4. Discussion

4.1. MarshRAM as an indicator of Wetland condition

MarshRAM's *Wetland Disturbances Index* and *Index of Marsh Integrity* (IMI) were designed to reflect different aspects of salt marsh condition. *Wetland Disturbances* quantifies aggregate observable marsh disturbances, whereas IMI was designed to reflect marsh-platform integrity as it responds to disturbances. In freshwater wetlands, several studies have documented a strong relationship between observational disturbances and integrity indices that are based on vegetation sensitivity to disturbances, such as Floristic Quality Assessment, upon-which IMI is partly based (e.g., Miller et al., 2006, Kutcher and Forrester, 2018). In contrast, only a weak relationship was evident between IMI and the MarshRAM disturbance index. However, IMI was designed to weight the stress of increased inundation period equally with the aggregate of observable disturbances (Appendix B). The response of IMI to marsh-platform median elevation (as a proxy for inundation stress), and the markedly-stronger response of IMI to elevation + disturbance, suggest that MarshRAM reflects the cumulative effects of inundation stress and other disturbances (nutrient stress, ditching, filling, etc.), as designed. IMI's strong response to elevation + disturbance supports earlier studies, which suggest that the impacts of certain disturbances (nutrient loading, ditching, crab over-grazing of *S. alterniflora*) on marsh integrity can be exacerbated or catalyzed by sea-level rise (Wigand et al., 2003, Wigand et al., 2014, Kirwan et al., 2016, Crotty et al., 2017). But the stronger correlation of IMI with elevation than with any other disturbance suggests that marsh communities may be responding primarily to an increased duration of marsh platform flooding that may be an outcome of accelerating sea-level rise (Raposa et al., 2017b, Watson et al., 2017, Payne et al., 2019). A more-precise measure of inundation stress, such as marsh elevation capital (i.e., elevation in relation to the tide frame), could further clarify the relationship between inundation, disturbance, and marsh integrity (Watson et al., 2017, Cahoon et al., 2019), but such precise measurements may be onerous to collect across multiple marshes for rapid assessments.

The significant correlation of IMI with marsh loss suggests that IMI may in-turn reflect overall marsh vulnerability to sea-level rise. IMI explains 61% of historic marsh loss among Rhode Island salt marshes assessed by Berry et al. (2015), and the most efficient model, comprising only the cover of *Meadow High Marsh* (−) and *Die-off Bare Depression* (+), explains 73% of marsh historic loss among those sites. Although the sample size for this trend is low ($n = 10$ marsh sites), this finding suggests that changes in high marsh community types may be a strong indication of marsh vulnerability, and is consistent with earlier findings that the ratio of unvegetated to vegetated salt marsh (UVVR) can signal

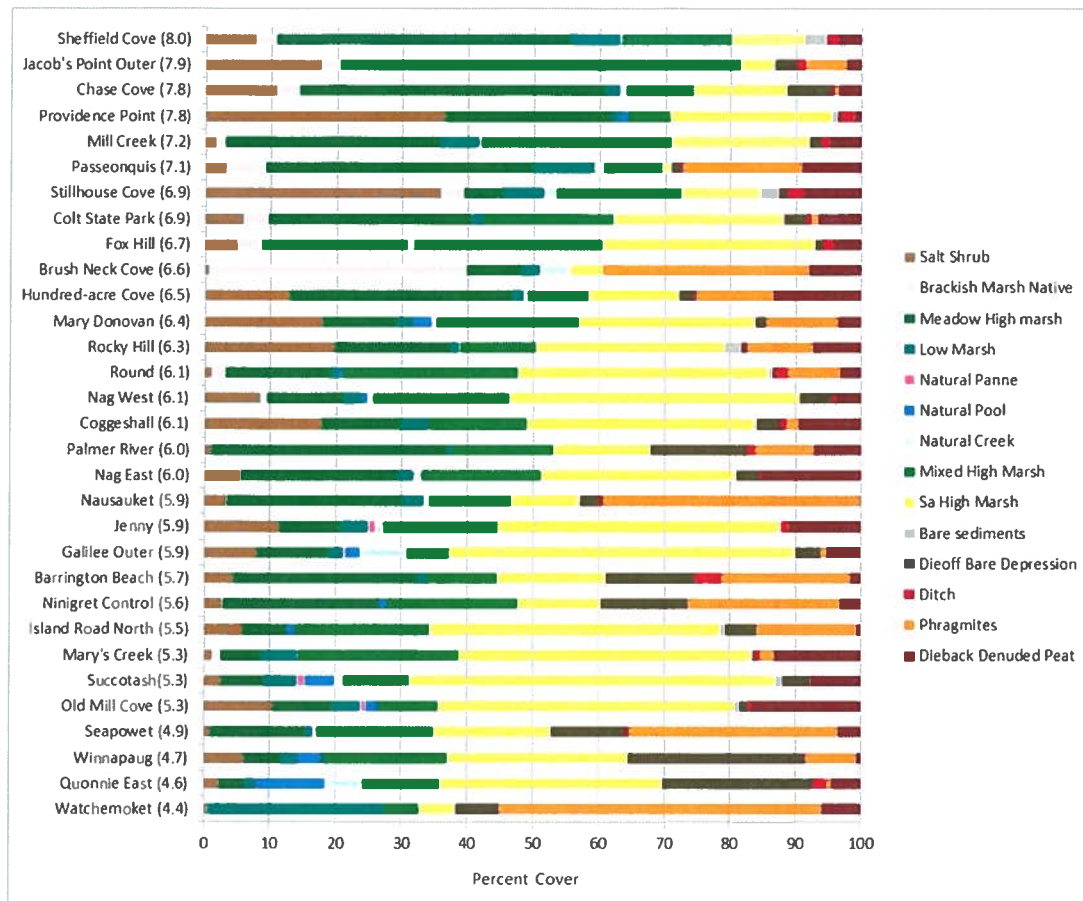


Fig. 2. IMI scores (parenthetic) and relative proportions of IMI salt marsh cover types from 31 salt marshes in Rhode Island; salt marshes are listed in descending order of marsh integrity according to IMI scores.

Table 3

MarshRAM community types and their mean cover across 31 RI salt marshes, sorted by Pearson correlation coefficients (r), indicating the relative influence of each type on IMI values across the marshes; i.e., the highest (+) and lowest (–) r coefficients indicate cover types that most strongly increase (+) or decrease (–) IMI scores.

MarshRAM Community	% Cover	IMI	
		r	P
Meadow High marsh	19.3	0.73	<0.01
Salt Shrub	8.7	0.46	0.01
Bare sediments	0.5	0.32	0.08
Ditch	0.8	0.24	0.19
Brackish Marsh Native	2.4	0.23	0.22
Mixed High Marsh	15.4	0.08	0.66
Dieback Denuded Peat	6	–0.11	0.54
Natural Creek	1.1	–0.11	0.54
Low Marsh	3.9	–0.18	0.32
Natural Panne	0.1	–0.24	0.18
Phragmites	9.8	–0.37	0.04
Sa High Marsh	25.7	–0.38	0.04
Natural Pool	1.1	–0.43	0.02
Dieoff Bare Depression	5.2	–0.53	<0.01

salt marsh vulnerability to increased inundation (Ganju et al., 2017, Wasson et al., 2019). Our findings further suggest that loss of high marsh vegetation from ponding and dieoff is a more influential mechanism of

marsh loss than edge dieback (including creek expansion), which did not significantly contribute to our model explaining loss. Analysis of MarshRAM community data against rigorous historic loss data across a larger set of wetlands may help clarify these apparent trends.

Meadow High Marsh most-strongly influenced the IMI, further indicating its sensitivity to human disturbances, particularly increased inundation. And, *Die-off Bare Depression* and *Natural Pool* had the strongest negative correlations with IMI, even as their average cover across our study marshes was only 5.2% and 1.1% of total marsh area, suggesting that even a minor occurrence of marsh platform die-off may be an early indicator of declines in marsh integrity, and supporting recent evidence that runaway pond expansion may be an important mechanism of salt-marsh loss in the Northeastern U.S. (Mariotti et al., 2020). However, it is noted that natural marsh ponds are a valued marsh cover type, providing habitat for marsh fishes and birds.

In contrast to *Meadow High Marsh*, *Sa High Marsh*, which was the dominant cover-type overall in the sample (25.7%), only modestly influenced IMI variability (negatively) and did not contribute significantly to the historic loss model, even as it has been shown that *S. alterniflora* is often the initial marsh species to invade the meadow high marsh community under a regime of elevation deficits in relation to the tide frame (Warren and Niering, 1993, Raposa et al., 2017a). This may point to die-off in the high marsh as a more indicative tipping point in marsh degradation.

Table 4

Matrix depicting IMI marsh degradation categories (IMI Bin) in relation to categories of MarshRAM functions and services, marsh migration potential, intensity of human disturbances, and mean elevation (from Watson et al., 2017); MD = most-degraded, ID = intermediately-degraded, LD = least-degraded; AA = above average, A = average, B = below average summed ranks of MarshRAM Ecosystem Functions and Services; Migration Area = ha of adjacent land with moderately-high migration potential; Replacement Ratio = Migration Area/area of site; disturbance categories: X = low-intensity, XX = moderate-intensity, XXX = high-intensity; green, yellow, and red shading represent, respectively, upper-quartile, interquartile range, and lower-quartile categories of marsh resiliency or value.

SITE CODE	IMI Bin	Disturbance	Elevation	Functions and Services	Migration Potential	Migration Area (ha)	Replacement Ratio	Buffer	Impoundment	Ditching	Nutrients	Fill	Erosion	Crabs	Die-off	Mowing	Phragmites
Sheffield Cove	LD	Low	ND	A	High	1.5	92%	X		XX		XX	XXX				X
Jacob's Point, Outer	LD	High	High	A	Low	0.5	6%	XX		XX	XX	XX	XX	XX	X		XX
Chase Cove	LD	Mod	High	A	High	4.1	80%		X	XX	X	XXX	XX	X			X
Providence Point	LD	Low	Med	B	High	2.5	53%			XX			X	X	X		X
Mill Creek	LD	Low	Med	B	Mod	1.4	29%			XX	X		XXX	XX			X
Passeonquis	LD	Mod	High	A	Low	2.3	75%	X		X	XXX		XXX	XX		X	XX
Stillhouse Cove	LD	High	Med	B	Low	0.0	0%	XXX		XX	XX	XX	XXX	X	XX	X	X
Colt State Park	LD	High	High	A	Mod	8.2	39%	X		XXX	XX	X	XXX	XXX	X	X	X
Fox Hill	ID	Low	Low	A	Mod	3.9	25%	X		X		X	XX	X	X		X
Brush Neck Cove	ID	Low	Low	A	Mod	3.2	114%				XXX		XX		X		XX
Hundred-acre Cove	ID	Mod	Med	AA	Mod	1.3	20%			X	XXX		XXX	XXX	X	X	X
Mary Donovan	ID	Mod	Low	A	Mod	5.4	15%	X		X	XXX	X	XX	XXX	X	X	X
Rocky Hill	ID	Mod	Med	AA	High	5.0	29%	XX	XX	X	XX	X	X	X	X	X	X
Round Marsh	ID	Mod	Med	AA	High	11.7	37%	X	X	XX	XX	X	XX	X	X		X
Nag West	ID	Mod	Med	AA	Mod	2.9	22%			XX		X	XXX	XXX	X	X	X
Coggeshall	ID	Mod	Med	A	Mod	7.7	38%			XX	X		XXX	XXX	X		X
Palmer River	ID	Mod	Med	AA	High	5.2	27%			XX	XX		XXX	XXX	XX		X
Nag East	ID	Mod	Med	AA	Mod	3.9	18%	X		XX	X	X	XXX	XXX	X	X	X
Nausauket	ID	Low	ND	B	Low	1.0	13%	X		XX	XX			X	X		XX
Jenny	ID	Mod	Med	A	Mod	3.8	30%	X		XXX		X	XXX	XXX		X	X
Galilee	ID	Mod	Med	B	Low	1.4	13%	XX		X		XXX	XXX		X	X	X
Barrington Beach	ID	Mod	High	AA	Mod	1.1	18%	X	X	XX	XXX	XX		X	XX		XX
Ninigret Control	ID	Low	Low	A	Mod	0.0	0%						XXX		XX		XX
Island Road North	MD	Mod	Med	B	Low	0.4	29%	XXX			XXX	XX	XX		X		XX
Mary's Creek	MD	High	Med	B	Low	0.0	0%	XXX		XX	XX	XXX	XXX	XXX	XX	X	X
Succotash	MD	High	Low	A	Mod	6.5	16%	XX	X	X	XX	XX	XX	XXX	X		X
Old Mill Cove	MD	High	Low	B	Mod	2.0	73%	X		X	XXX	XX	XXX	XXX	XX		X
Seapowet	MD	High	Med	AA	Mod	12.6	14%	XX	X	XX	XX		XXX	XXX	XX	X	XX
Winnapaug	MD	Low	Low	A	Mod	0.0	0%	X		X	XX	X	XX		XX		X
Quonnie East	MD	High	Low	AA	High	5.3	19%			XXX	XX	XX	XXX	XX	XX		X
Watchemoket	MD	High	Low	B	Low	0.8	136%	XX	X		XXX	XX	XX	XX			XXX

Table 5

Pearson correlation coefficients (r) and probability values comparing MarshRAM IMI values with loss and elevation estimates from prior studies, and with latitude—Bonferroni adjusted $\alpha = 0.013$; Wetland Disturbance + Median Elevation represents the additive effect of the two prior metrics analyzed against IMI using stepwise regression (r reported rather than r^2 for comparison to other metrics); note that the Wetland Disturbance index decreases with increased disturbance. Values from Stillhouse Cove were removed from this analysis because a prior marsh-platform restoration may have affected how IMI values related to the Reference Indicators compared with the other non-restored sites.

Reference Indicators	IMI		
	n	r	P
Historic Loss	10	-0.78	0.008
Latitude	30	0.37	0.044
Median Elevation	28	0.53	0.004
MarshRAM Wetland Disturbance	30	0.44	0.016
Wetland Disturbance + Median Elevation	28	0.75	0.004

4.2. Condition of the study marshes; a historical comparison

Our study marshes diverge in community composition from historic accounts of southern New England salt marshes. In their seminal study, Miller and Egler (1950) detailed vegetation communities at a salt marsh complex surrounding Barn Island at the eastern-most border of Connecticut, USA (directly bordering Rhode Island). The un-ditched

portions of the Barn Island marshes were reported to be dominated by *Juncus gerardii* and *S. patens* high marsh with fringing bands of low marsh and marsh-upland transition communities. The authors estimated that “as much as” 20% of those un-ditched areas comprised circular or nearly-circular *Pannes* and *Potholes*; the occurrence of *S. alterniflora* on the high marsh was reported to be restricted to those pannes. Considering 20% cover of *Panne* and *Pothole* evenly split among the authors’ *Pothole* and *Panne* types, a fringing band of *S. alterniflora* low marsh (set conservatively at 10%), a fringe of marsh-upland interface (arbitrarily set at 10%), and the remaining 60% split among meadow high marsh *J. gerardii* and *S. patens* types (both classified as *Meadow High Marsh* by MarshRAM), an un-ditched late-1940s Barn Island marsh without invasive *P. australis* would have an IMI value of approximately 8.9. Similarly, in his historic description of plant zonation in New England salt marshes, Chapman (1938) presents a plan-view map of a representative back-barrier marsh, depicting approximately one third of the marsh covered by low-marsh *S. alterniflora* and the bulk of the remaining two-thirds covered by *S. patens*, *Distichlis spicata*, and *J. gerardii*, all three of which would be classified as *Meadow High Marsh* by MarshRAM. Small areas (~5%) of fringing “freshwater marsh” depicted on the platform are described as sometimes being dominated by *P. australis*. Applying IMI to the distribution of plant communities in Chapman’s New England salt marsh, assuming 5% *P. australis*, would generate an IMI score of 9.0.

We acknowledge that the accounts by Miller and Egler (1950) and Chapman (1938) may not be fully representative of undisturbed historic

marsh conditions; however, a comparison with these earlier conditions may offer perspective on the current conditions of our study marshes. Applying an IMI of 8.9 (or 9.0) as a reference value of historic marsh integrity would suggest that the integrity of marshes in our study sample ($n = 31$) is considerably degraded on average. There is no way, however, to determine if the study marshes that approach an IMI of 8.9 are within natural variation of an undisturbed marsh, or are in-fact degraded by human activities, including sea-level rise. For example, Sheffield Cove (IMI = 8.0) has a nearly-representative distribution of historic communities, except for a moderate occurrence (16.6%) of *Mixed High Marsh* (*Meadow High Marsh* and *S. alterniflora* mix), which was not a type described by Miller and Egler or Chapman, and 3.4% representation of *Dieback Denuded Peat* (edge die-back) a feature also not described by those authors. *S. alterniflora* was reported as occurring “rarely” in both of Miller and Egler’s high marsh communities (*J. gerardii* and *S. patens* dominated), suggesting that a substantial mixed community did not occur at Barn Island Marsh at that time. Nearly every marsh in our study had some *Mixed High Marsh*, but its occurrence was low (5–10%) at some sites.

In contrast to Sheffield Cove, several sites in the lower range of IMI scoring clearly diverge from the historic marshes. For example, Quonnie East, has only 3.5% cover of *Meadow High Marsh*, 34% *Sa High Marsh*, 11.7% *Mixed High Marsh*, and 23% *Dieoff Denuded Peat*. Several marshes with intermediate IMI values have very little *Dieoff* (<5%), but have low representation of *Meadow High Marsh* (<20%) and high representation *Mixed* and *Sa High Marsh* (>40% combined), indicating a vegetation shift from *S. patens* to *S. alterniflora* that is theorized to precede dieoff in the process of marsh drowning (Warren and Niering, 1993, Raposa et al., 2017b).

4.3. Management implications

Understanding how sea-level rise and other disturbances are contributing to marsh degradation is critical for identifying conservation approaches (Roman, 2017, Wasson et al., 2019), and a decision-support matrix based on MarshRAM and marsh-elevation data, such as presented in Table 4, may be a useful tool to help managers visualize and interpret this complex information. Table 4 demonstrates how collecting the full suite of MarshRAM data across multiple sites can establish a range of salt marsh conditions, against which individual wetlands can be evaluated (i.e. “reference gradient”, Faber-Langendoen et al., 2009). Assigning management categories, based on upper and lower quartiles and inter-quartile ranges of metric and attribute values, can be used to clarify the relationships among ecosystem services, human disturbances, elevation, marsh integrity, and migration potential by simplifying interpretation of each metric (a central purpose of categorization) and reducing the chance of overestimating metric-value precision and meaningfulness (Barbour et al., 1996, Miller et al., 2006). MarshRAM disturbance information (*Wetland Disturbances*), categories of marsh integrity (IMI), relative value (sum of *Ecosystem Functions and Services*), and migration potential (*Migration Area* and *Replacement Ratio*) have been used together in Rhode Island to help managers prioritize salt marshes for restoration and marsh migration facilitation activities (Kutcher and Chaffee, 2021).

MarshRAM data can also identify general management considerations for marshes. The negative association between historic loss and *Replacement Ratio* (the proportion of existing marsh that, with minimal or no management, will theoretically replace marsh losses from sea-level rise as marshes migrate inland) suggests that marshes with larger migration corridors relative to the size of the marsh are losing vegetated area more slowly than those with smaller corridors; this implies that unassisted marsh migration may already be contributing to marsh sustainability. But, the median *Replacement Ratio* of 25% implies that, without active management, only about a quarter of existing marsh area will be replaced through landward migration as marshes succumb to inundation stress. Management within existing marsh footprints, such as

thin-layer sediment placement (Raposa et al., 2020), and management of the surrounding landscape, such as removal of barriers to migration and protection of migration corridors, may be needed to improve the prospects of salt marsh sustainability.

Phragmites was present at every marsh in the study. *Phragmites* can outcompete native species, diminish habitat value, and impede landward migration of native marsh species (Farnsworth and Meyerson, 1999, Meyerson et al., 2000, Benoit and Askins, 2002, Smith, 2013). *Phragmites* is a disturbance to marsh function, but is also a vegetative response to other disturbances such as filling, land clearing, hydrologic alteration, and nutrient loading associated with coastal development (Roman et al., 1984, Silliman and Bertness, 2004, Meyerson et al., 2009). Our rapid data clarify the pervasiveness of *Phragmites* in the region and provide managers with a way to compare its abundance across individual marshes in relation to other disturbances captured by MarshRAM.

Marsh edge erosion was another pervasive disturbance (29 of 31 sites), assessed as severe (>60% of the marsh edge) at 18 of 31 sites. Coincident occurrence of *Dieback Denuded Peat*, indicating burrowing-crab damage (Holdredge et al., 2009), at many of these highly-eroded sites suggests a positive interaction between crab overabundance and sea level rise (Crotty et al., 2017, Raposa et al., 2018). The prospect of accelerating sea-level rise, often coupled with crab herbivory and burrowing precipitating marsh loss along the seaward edge, further emphasizes the need for promoting marsh migration along the landward edge.

The increasing number of marsh-dependent sparrows flushed along the IMI transects with the increasing cover of ditches suggests that marsh sparrows may be opportunistically using salt marsh ditches for nesting or foraging. Reinert and Mello (1995) found that seaside sparrows (*A. maritima*) in southern New England focused their nesting and foraging activities in the medium-height high-marsh *S. alterniflora* bordering ditches and creeks, whereas saltmarsh sparrows (*A. caudacuta*) more-often used salt-meadow plants (e.g., *S. patens*, *J. gerardii*), which frequently colonize the raised spoils associated with historic ditching. We did not differentiate between the two sparrow species during our MarshRAM surveys. Still, this finding raises the concern that both the benefits and potentially harmful effects of managing historic ditches should be considered in management planning (Corman et al., 2012). More intensive study into sparrow use of historic ditches may be warranted for clarifying the full ecological effects of ditch remediation, particularly given the recent decline of marsh sparrows and their critical dependence on specific attributes of salt marsh vegetation for survival (Correll et al., 2017).

Studies have long theorized that vegetation dieoff can occur between the natural creek levees and between linear spoils of ditches (Nichols, 1920, Miller and Egler, 1950, Smith and Niles, 2016, Watson et al., 2017). Our study found no relationship between the cover of natural creeks or ditching intensity versus IMI or versus the cover of marsh dieoff (even as ditching was observed at 27 of 31 sites), suggesting that the inter-levee panne-formation process is not currently a main driver of marsh degradation at our study marshes. More recent studies implicate increased rates of sea-level rise and accretion deficits in relation to the tide frame in widespread dieoff of the historic peat platform (Ekberg et al., 2017, Watson et al., 2017); findings from our study, that relatively small amounts of dieoff and ponding have a strong negative influence on IMI and historic loss, more-closely support these recent conclusions. Documenting changes over time in dieoff features, pool size, vegetation shifts, and marsh platform elevation in relation to the tide frame will clarify the role of sea-level rise in the process of marsh degradation and loss.

4.4. Logistics and transferability

Our findings indicate that MarshRAM observational data and our novel, rapid *walking-transect* data were efficient to collect and consistent

across users and habitat types in Rhode Island, USA. We recognize that some MarshRAM attributes and metrics may need to be modified for application in other regions, but the utility of the RAM—e.g., categorizing marshes by attributes for analysis, identifying specific disturbances and their individual and aggregate influences on marsh integrity, comparing individual marshes against a “reference gradient” of condition for management planning—can be preserved. For example, the *walking transects* may be difficult to conduct at the larger marshes found in some regions. In such cases, investigators may be able to instead use a geographic information system and remote classification to determine the relative proportions of the meaningful community types; applying those proportions to the CCI could then be used to calculate IMI scores. Specific recommendations for adapting MarshRAM to other regions are offered in [Appendix C](#).

4.5. Conclusion

MarshRAM has provided valuable information for salt-marsh management in Rhode Island, and it could be adapted for application in other states, across regions, or nationwide. Although rapid assessment methods for estuarine wetlands in other states exist (Jacobs, 2003, Carullo et al., 2007, CWMW, 2013), MarshRAM may offer benefits not provided by others, such as setting and classification information, a ranking method for functions and values, opportunistic waterbird and marsh bird tallies, a tested surrounding-landscape evaluation model, comprehensive disturbance metrics, community composition information that can generate metrics of degradation/vulnerability, and metrics characterizing site-level landward migration potential. Also, MarshRAM keeps function and value information separate from disturbance and degradation information, which can be important for analysis and decision support ([Table 4](#)). The inclusive, yet rapid framework of MarshRAM may be attractive to applied scientists and managers beyond Rhode Island because, with a single visit per marsh, it provides reliable site-level information that may be useful for characterizing marsh condition and value, better understanding the relationships between disturbances and marsh integrity, prioritizing sites for restoration and conservation, and assessing restoration success.

CRediT authorship contribution statement

Thomas E. Kutcher: Conceptualization, Methodology, Formal analysis, Writing – original draft. **Kenneth B. Raposa:** Methodology, Validation, Writing – review & editing. **Charles T. Roman:** Methodology, Writing – review & editing.

Declaration of Competing Interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

Acknowledgements

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tested and provided valuable feedback on the methods. The Rhode Island Natural History Survey is generously housed by the University of Rhode Island College of the Environment and Life Sciences, USA.

Appendices. Supplementary data

Supplementary data to this article can be found online at <https://doi.org/10.1016/j.ecolind.2022.108841>.

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Patrick, Diana

From: Jo Ann Miller <civicinput@newmode.io>
Sent: Friday, July 24, 2026 10:14 AM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

I am writing concerning the new rule establishing standards for private recreational docks. While I support CRD's efforts to codify dock standards for Georgia's coast, I feel strongly that the rules should impose stronger limits on the size and footprint of private docks rather than allowing for larger and longer docks.

The damage these oversized and too long docks have done in the Savannah area is already considerable, especially when imposed on small tidal creeks and tributaries. The long docks often trap marsh grass and prevent it from washing out of the tidal creeks into the ocean. This backed up "wrack" then remains in place and smothers and weakens living marshes, causing significant damage to the delicate marshland ecosystem. Please, please support meaningful limits on this continued desecration and destruction of our marshes. Commercial private interests should not be permitted to damage this beautiful and fragile ecosystem of marshland on the Georgia Coast for the benefit of the few at the expense of the community.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.

- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Jo Ann Miles Miller

[REDACTED]

Savannah GA

Patrick, Diana

From: Eleanor Rhangos [REDACTED]
Sent: Friday, July 24, 2026 12:15 PM
To: Comments, CRD
Subject: Comment on Proposed Private Dock Guidelines

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.

I am writing to object to the proposed rules allowing a more than **100% increase** in the maximum allowable footprint of the boardwalk over the marsh, expanding from a limit of 3,000 sq. ft. to 6,600 sq. ft. This represents more than a doubling of shading impacts despite the known science, commissioned by DNR, which demonstrated that shading of marsh grass by dock walkways directly reduces marsh productivity. This new maximum footprint is more than 50% larger than South Carolina's maximum dock square footage of 4,000 sq. ft. Among our peer states, South Carolina's low coastline and marsh conditions are most similar to Georgia's, so why would Georgia marsh front property owners require docks so much larger than those in South Carolina? The spread of oversized or "party docks" will have a severe negative impact on the productivity of our marshes as well as disrupt the scenic beauty that draws people to the coast and can negatively affect neighbors' quality of life and viewshed.

Thank you for your consideration.

Eleanor Rhangos

Patrick, Diana

From: Loretta Fountain [REDACTED]
Sent: Friday, July 24, 2026 12:31 PM
To: Comments, CRD
Subject: Proposed New Changes for Private Dock Owners
Attachments: GA DNR Private Dock Revoke License.docx

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.

Attached are my comments to the Proposed Changes for Private Dock Owners/Revocable Licenses.

Loretta Fountain

24 July 2026

Subject: Comments to the Proposed Revokable Licenses – Private Docks

Georgia DNR

From: Loretta Fountain


I HIGHLY OPOSE the DNR PROPOSED LAW CHANGES FOR PRIVATELY OWNED DOCKS.

Issuance of a Revocable License:

I do support the requirement for permits for new or footprint/expansion for privately owned docks. However, once that dock has been completed and has met the permit requirements, the process ends at that point. The proposed changes to the current legislation, I feel, will place endless burdens on the landowner and DNR. The current requirements are not an easy process and is very time consuming, so with the new proposed changes, I vision the process being more complicated. The existing privately owned permitted docks should be grandfathered, not require a revocable license. Also, with a past valid permit that authorized the construction/maintenance of the privately owned dock, it should be transferable to an individual upon sale of the property. If not transferable, I envision this would impact/reduce the value of said property because DNR might refuse to issue the new landowner a revocable license. The application the new owner must complete is ridiculous since all the requirements were completed and exist with the original permit that was issued to build the dock in the first place.

For the maintenance of already authorized permitted docks, it should not require a revocable license to replace/maintain pilings, etc. that require a barge, crane or such equipment as long as the current authorized footprint is not exceeded.

For new dock construction where a dock has not been built, expansion of the existing dock or changes affecting the footprint, I agree the revocable license or some form of permit should be required. However, the revocable license requirements should not be so rigid that it impairs the applicant requesting the license-some of the proposed requirements appear to be unrealistic.

Inspections, Revocation, Suspension, or Modification of Revocable License; Penalties:

The proposed law changes for compliance inspections by the Department without notification to the property owner is not acceptable. I worked with the Federal Government and performed compliance inspection. Notification to the owner, owner/representative was allowed to be present during the inspection, with a follow up compliance inspection report sent to the owner. The report outlined non-compliant issues and a deadline given to correct with a follow up inspection with the owner/representative in order to be placed back into compliance in accordance with their lease, license or permit.

The Department should advise the property owner the date/time when an inspection will be done and given to opportunity to be present during the inspection. Also, the Department should provide a notice

to the landowner of any non-compliant items, timeframe to fix the items, and issue a notice when compliance is met and the safety of the dock is achieved.

With all the compliance inspection proposed, does that alleviate the liability/safety issue from the landowner and place the liability on the Department/State?

Will the inspections have a timeframe such as being inspected on an annual basis, every 5 years, every 10 years etc. from the license issuance date?

Will the inspector be certified in the various fields that they need to say if the dock is in compliance or safe?

In General:

I agree the environment and waterways should be protected, but enforcing additional requirements to existing private owners with authorized permits is crazy. I also know proposed changes can be a very costly budget item that will be passed on to the property owners in Georgia. We already have so many regulations to comply with, this creates another one. What happened to the Administration reduction in enforcement regulations?

Loretta Fountain


Patrick, Diana

From: Ken Mangelsdorf <[REDACTED]>
Sent: Friday, July 24, 2026 12:43 PM
To: Comments, CRD
Subject: Proposed regulation Change
Attachments: 4906_001.pdf

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.

Please find the attached letter.

Ken Mangelsdorf

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

NOTICE: This e-mail message and all attachments transmitted with it may contain legally privileged and confidential information intended solely for the use of the addressee. If the reader of this message is not the intended recipient, you are hereby notified that any reading, dissemination, distribution, copying, or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately by telephone [REDACTED] or by electronic mail [REDACTED] and delete this message and all copies and backups thereof.

July 24, 2026

Ms. Jill Andrews
Georgia Department of Natural Resources
Coastal Resources Division
crd.ccmments@dnr.ga.gov

Re: Notice of Proposed Regulation Change: Proposed Amendments to Rules for Private Docks over State-Owned Tidal Water Bottoms, Rules 391-2-1-.01 through 391-2-1-.08, Creating Rule 391-2 -1.09.

Dear Ms. Andrews:

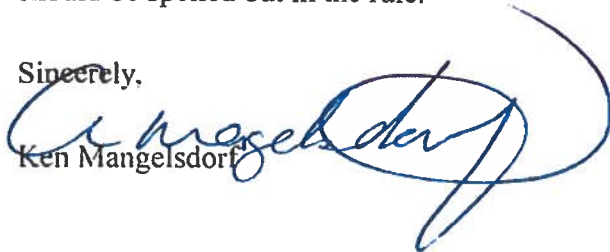
Please accept these comments in response to the above-noted proposed rule. My name is Ken Mangelsdorf and I own marsh front property on Skidaway Island. I write to oppose the arbitrary length requirement of 1,000 feet and the variance of only 10%. There is no environmental or ecological basis for this limit. The result of placing a hardline limit will be that some neighbors on the same street have a dock (that predates the SOP) and neighbors seeking to build a dock will be told "no." Same waterway, likely the same distance walkway, but different results solely based on the date of the application.

While there is no scientific support for limiting the length of walkways, dock builders and engineers have studied construction techniques that can allow for more sunlight to the marsh. I ask that the Board amend the proposed rule by eliminating the proposed maximum walkway limit altogether or, at a minimum, amend the variance from an arbitrary 10% cap to "a variance can be requested if supported by approved construction mitigation techniques" or something similar.

Finally, the rule does not clarify the rules for single family docks vs. multi family docks. The two classifications are not defined despite CRD issuing separate licenses. The CMPA requires certain things (like restrictive covenants) of multi family docks, but also exempts multi family docks from the CMPA permitting process. It is confusing and not addressed in the rulemaking. The capability and process to transfer a dock license from a multi family to a single family should be spelled out in the rule.

Sincerely,

Ken Mangelsdorf



Patrick, Diana

From: Lisa Brewer <civinput@newmode.io>
Sent: Friday, July 24, 2026 1:30 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. This is about what is right for the environment and other people. Not what a small group of people want access to. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Lisa Brewer



Patrick, Diana

From: Sarah Conner <[REDACTED]>
Sent: Friday, July 24, 2026 1:34 PM
To: Comments, CRD
Subject: Public comment on standards for private recreational docks

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.

Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

Large docks are a significant disruption to marsh birds, fish and other wildlife. Larger docks mean more fragmented habitats. Fragmented habitats is a known cause of Georgia's coastal birds and other wildlife decline.

Georgia's SWAP Species of Greatest Conservation Need (SGCN) would be heavily impacted by changes allowing large docks. There are OVER 272 species of concern in the Georgia coastal plain - keeping private docks reasonable supports the SWAP plan. Larger docks and less rules means more disruption to species of plants and animals. For example, the Gull-billed Tern is threatened in Georgia, and has been a SWAP SGCN since 2015! We cannot continue to FAIL to protect the feeding habitat of these coastal nesting birds! Without the proper marsh ecoregion, parents cannot feed their hatchlings, and we lose more and more birds every year!

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
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- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal wildlife.

Thank you for considering my comments,

Sarah Conner

Vice President, Oconee Rivers Audubon Society

 Athens GA

Patrick, Diana

From: Gabe Andrle <civcinput@newmode.io>
Sent: Friday, July 24, 2026 1:38 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Gabe Andrle



Patrick, Diana

From: Sarah Manning <sarah.manning@birdsgeorgia.org>
Sent: Friday, July 24, 2026 1:46 PM
To: Comments, CRD
Cc: Adam Betuel; gabe.andrle
Subject: Subject 391-2-1 / Dock Rules comments - Birds Georgia
Attachments: Birds Georgia_Dock Rules 2026.docx.pdf

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.

Greetings,

Please find attached comments from Birds Georgia in regards to the proposed amendments to Subject 391-2-1 (Dock rules).

Thank you for considering our comments.

Regards,
Sarah Manning

Sarah Manning | Conservation Coordinator



Birds Georgia

825 Warner Street, SW, Ste. B, Atlanta, GA 30310
678-973-2437 | sarah.manning@birdsgeorgia.org

Pronouns: She, her, hers

Birds Georgia is building places where birds and people thrive. Help us by [becoming a member](#).



BIRDS GEORGIA

825 Warner St. SW, Ste. B, Atlanta, GA 30310

www.BirdsGeorgia.org

678-973-2437



Submitted electronically on July 24, 2026 to crd.comments@dnr.ga.gov

Jill Andrews, Chief of Coastal Management
Georgia Department of Natural Resources
Coastal Resources Division
1 Conservation Drive, Brunswick, GA 31520

Dear Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. Birds Georgia's mission is to build places where birds and people thrive. We fulfill our mission through education, conservation, and community engagement. With more than 2,500 members and more than 5,000 National Audubon Society members from across the state, Birds Georgia represents a broad constituency united by a desire to protect birds and other wildlife. Our constituents include Georgia residents, frequent visitors, and concerned citizens who understand both the significance and beauty of Georgia's coastal marshlands for recreation, relaxation, and as habitat for birds and other wildlife.

On behalf of Birds Georgia, I am submitting the following comments on the proposed Rules for Private Recreational Docks, issued by the Georgia Department of Natural Resources (DNR) Coastal Resources Division (CRD) on June 24, 2026. We echo the comments made by One Hundred Miles as signatories on their comment letter. The Georgia coast and its dynamic coastal marshes provide refugia for numerous bird species, including many of conservation concern, due to the protection provided by the State of Georgia through the Coastal Marshlands Protection Act in 1970.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks.

We recommend CRD strengthen the proposed rules in the following ways:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and more than 50% larger than the standards set by nearby South Carolina with similar marsh conditions.
- Subsequently, require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to adhere to new, potentially larger, standards.

As DNR deliberates the proposed Rules, Birds Georgia encourages the Board to consider the following:

- Habitat Fragmentation: Docks can erode the integrity of the marsh ecosystem. Unbroken stretches of marshland provide exponentially greater habitat value than areas divided by expansive boardwalks, walkways, and platforms.
- "Long pier density was negatively related to obligate marsh bird relative abundance and species richness, and facultative marsh bird species richness, whereas it was positively related to the relative abundance and species richness of gulls and terns. Based on the negative effects of long piers on obligate marsh birds, management should focus on reducing the presence and density of long piers in tidal marshes by requiring the removal of existing long piers, or reducing or eliminating permits for construction of new long piers." Banning and Bowman, 2009.¹
 - A few notable obligate marsh birds in Georgia include: Clapper Rail, Worthington's Marsh Wren, MacGillivray's Seaside Sparrow; as well as nonbreeding Nelson's and Saltmarsh Sparrows. Marsh fragmentation and high marsh and adjacent marsh margin usage will impact these sensitive species, which are already listed as species in Georgia's 2025 SWAP update, ranging from critical (Saltmarsh Sparrow, MacGillivray's Seaside Sparrow, Worthington's Marsh Wren) to high and moderate conservation concern (Nelson's Sparrow and Clapper Rail) in Georgia.² As the state agency tasked with the recovery of these species, it should be the Georgia DNR's goal to reduce threats like the ones that more numerous long docks could pose to the health of the saltmarshes and birds that rely on them.
- Marine Debris and Structural Resilience: As storms become more frequent and severe, poorly built or maintained docks become marine debris littering our marshes, which may affect birds and their prey, including but not limited to: wading birds, seabirds, and shorebirds. Limiting dock sizes and ensuring that responsible contractors build to acceptable standards are the most effective ways to limit future impacts to the marsh from dock debris.

We encourage DNR to maintain the current policy limiting dock size and adopt stronger regulations governing their construction and maintenance. These protections are necessary to preserve the ecological value of our coastal marshlands for current and future generations. We appreciate the efforts of the Board of Natural Resources and the Coastal Resources Division in seeking input on this important topic, and considering our comments and concerns on the proposed Rules.

Thank you for considering our comments,



Adam Betuel
Executive Director
Birds Georgia

1. BANNING, A.E. and BOWMAN, J.L. (2009), Effects of Long Piers on Birds in Tidal Wetlands. The Journal of Wildlife Management, 73: 1362-1367. <https://doi.org/10.2193/2007-571>

2. Schneider, T. M. and T. S. Keyes. 2025. Birds technical team report for Georgia's State Wildlife Action Plan 2025 revision. In Georgia 2025 State Wildlife Action Plan. Social Circle, GA: Georgia Department of Natural Resources. Available [online](#).

Patrick, Diana

From: Allison Wheeler [REDACTED]
Sent: Friday, July 24, 2026 2:06 PM
To: Comments, CRD
Subject: Public Comment about CRD/DNR Proposed State Dock Regulation Changes

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.

Hello Ms. Andrews,

Thank you for the opportunity to provide public comment on the proposed change to state dock regulations to allow for wider and longer recreational docks over the public saltmarsh. I have read and heard about the proposed changes from multiple sources, and I understand there is much opposition to the proposed changes. Please count me as an opponent to these proposed changes as well.

I imagine you have received a lot of comments that included environmental, scientific, marsh productivity, diversity of marsh wildlife, and aesthetic reasons why wider and longer docks are opposed. I won't repeat those reasons, but I will provide 2 additional ones.

(1) My father is disabled so I understand the desire for usage of a golf cart on a wider walkway; but, the usage of a wheelchair (as is done today) on a 3'-wide walkway is oh so much safer than a golf cart driving over the marsh. Gosh, can you imagine what would happen if a golf cart slipped off the walkway? Dock owners are only human so that is bound to happen multiple times. Damage to the cart occupants and the marsh itself would be intense after an accident, and hard to restore.

(2) It is well-known that coastal storms and hurricanes are becoming more intense. The winds and water surge from direct hits and peripheral hits can cause catastrophic damage. Imagine how much more dock materials will be damaged and strewn around the marsh area and beyond if there were wider and longer docks. Environmental damage to the marsh due to excessive debris just sitting in it, washing away, or due to the clean-up process would be immense.

Please consider all the negative comments (including mine) that the CRD has received concerning the proposed changes to the state dock regulations for private docks and oppose the changes. The benefits of regulation changes that positively affect people with private docks do not outweigh the multitude of negative aspects to these changes that affect the public salt marshes (that belong to everyone).

Thank you for listening,

Allison Wheeler
(family has property in Camden and MacIntosh Counties)
[REDACTED]

Patrick, Diana

From: Mary Lambright <civicinput@newmode.io>
Sent: Friday, July 24, 2026 2:09 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts. And the extra size will shade out more marsh grasses.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience. When my dock was built (in 2007), I had to get approval of my neighbors on either side of my property.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway. A 4 foot wide walkway is fine and allows for wheelchair access.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Mary Lambright



Patrick, Diana

From: Montague,Clay L [REDACTED]
Sent: Friday, July 24, 2026 2:12 PM
To: Comments, CRD
Subject: Clay Montague's Comments on Dock Rules
Attachments: Clay Montague's Comments on Dock Rules 24Jul2026.pdf

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.

Please find attached my comments on the proposed private dock rules. Please acknowledge receipt. If this is a duplicate my apologies (computer issues today).

Yours,

Clay Montague
[REDACTED]

Clay L. Montague, PhD.
Associate Professor Emeritus
Department of Environmental Engineering Sciences University of Florida

COMMENTS ON PROPOSED AMENDMENTS TO SUBJECT 391-2-1, PRIVATE DOCKS

24 July 2026

Respectfully submitted by

Clay L. Montague, PhD

Resident of Camden County, Georgia

Associate Professor Emeritus, HT Odum Center for Wetlands,

Department of Environmental Engineering Sciences, University of Florida



The proposed rules for private docks are clearly much needed, are well-written, and can be modified in the future if they prove unserviceable for any reason. They seem to be justified, however, primarily by a past permitting process rather than an up-to-date understanding of dock impacts and their mitigation.

Quite a bit of ecosystem management research has been done on how docks impact fish and wildlife habitat, marsh birds, fishery production, and other tideland marsh functions such as estuarine water quality maintenance and storm damage reduction. The public and tideland managers need an update. An ongoing effort to document the current state of knowledge of dock impacts and mitigation methods would be helpful guidance for the Coastal Resources Division (CRD) as well as the public.

Georgia's tidal marshes are special – as eloquently stated in the opening paragraph of the Marshlands Protection Act of 1972 (O.C.G.A. § 12-5-281 *Legislative findings and declarations*). The effort to manage this well-loved and valuable ecosystem is the tradeoff between protecting our estuaries and promoting access and appreciation of their natural beauty and riches. Dock management is at the center of this balance.

My specific comments on certain proposed rules are as follows:

Page A-12, §391-2-1-.03 *Issuance of a Revocable License* (e): Comma after “recreational activities” implies something may be missing. If docks can only be used for recreational activities, please remove the comma between “activities” and “only.”

Page A-12, §391-2-1-.03 *Issuance of a Revocable License* (f): Please clearly state whether tidewaters over marshlands are considered navigable under the concept of reasonable navigation used in this section. In discussions of navigable waters in Georgia, hightide waters have been considered navigable for paddling a canoe or kayak. Docks interfere with paddling activities such as fishing for tailing red drum in marshes, photographing wildlife, measuring marsh elevation without compressing the marsh by standing on it at low tide, setting minnow traps for bait, and other recreational activities. Private docks limit the view of red drum tailing and other wildlife. Docks often cannot be traversed owing to low height above high tide and cross bracing.

Page A-14, §391-2-1-.04 *Standards and Conditions of New Private Docks* (4). This comment pertains to the height of a dock to clear all vegetation. It is critical to state when the assessment of vegetation height is done. It will likely vary among species, but the most radical is likely to be that for saltmarsh cordgrass growing along the creekbank levees. Flower culms of saltmarsh cordgrass, *Spartina alterniflora* (= *Sporobolus alterniflorus*), growing along the edges of some Georgia tidal waterways reach well above mean high water, sometimes more than 6 ft. By the end of the growing season non-culm stems are also as tall in some places. It is not clear if the rule applies to the maximum height reached in the growing season. If so, then in those cases would the private dock application not be granted? Please clearly address when the determination of vegetation height is to be done.

Page A-16, §391-2-1-.04 *Standards and Conditions of New Private Docks* (10). Please add a statement that a mooring pile/dolphin cannot be placed such that the vessel would be moored over vegetation. Floating docks are often bordered by vegetation growing on the landward side or just beyond the ends of a floating dock.

Page A-20, §391-2-1-.08 *General Conditions of Revocable Licenses for Private Docks* (8). Besides interference with navigation (as stated in this section), what is an example of “an unreasonable encroachment into the waterway” as mentioned in this section?

Additional comments:

1. How many revocable private dock licenses have been revoked in the past decade? How many are estimated to be revoked in the coming decade?
2. How many docks have been removed in the past decade? How many are estimated to be removed in the coming decade?
3. One way to control the total area covered by docks over Georgia tidal marshland, is to set a total coverage limit, perhaps at first arbitrarily by using judgement based on current knowledge and experience. Above this limit, mitigation of a new dock permit can occur by revoking a license somewhere else and enforcing the dock’s removal. Every decade, the limit can be reviewed as new evidence about dock impacts and their mitigation arises.
4. Geographic information system (GIS) tools on aerial images can estimate the total area now covered by docks now in Georgia (whether or not the docks are in the permit database). This information would help the public understand the need for dock rules.
5. To better limit docks and to mitigate their impacts, the Coastal Resources Division (CRD) of Georgia DNR should prepare a document that reviews known ecological consequences of docks on production and behavior of fish and wildlife in Georgia’s tidal marshes (or similar marshes in other states). Actions that mitigate known impacts can be accommodated in future dock rules. Some formerly suspected impacts may have proven not to be of concern. An up-to-date review of scientific

literature should point these out. Remaining suspected impacts can then be prioritized for research that could rule them out, or rules could be modified to accommodate newly understood impacts.

Patrick, Diana

From: Virginia Zart <civicinput@newmode.io>
Sent: Friday, July 24, 2026 3:30 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks. I support CRD's efforts to codify dock standards for Georgia's coast but I have concerns about the size of the private docks and the impact on our marsh and ecosystem.

There should be better limits placed on the size of the docks. I do not understand the need or purpose for a private dock to be 6,000 square feet. Our coastline and marsh are what make this place special and beautiful. I understand that people want to live here and enjoy the water, but there are plenty of ways to access and experience the marsh and water without building such a large dock to access it from a private property (that only one family uses), and without negatively impacting the very marsh and coast we enjoy.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Virginia Zart



Patrick, Diana

From: nancy maier [REDACTED] >
Sent: Friday, July 24, 2026 3:36 PM
To: Comments, CRD
Subject: Private dock size

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 DNR,

I am truly surprised at this proposed regulation/law. No one needs a six foot dock. I am especially perturbed because DNR forced me to give up part of my land due to the regulation of only one dock per piece of land. There is no difference in the separation of 2 small docks and allowing an over-sized dock. The 100 miles of our precious coast "cannot take the heat" of over development. Please do not do this.

Sincerely

Nancy Maier
[REDACTED]
[REDACTED]

Patrick, Diana

From: Anjali Jarrett <civicinput@newmode.io>
Sent: Friday, July 24, 2026 3:42 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews,

I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Anjali Jarrett



Patrick, Diana

From: Angelee J [REDACTED]
Sent: Friday, July 24, 2026 3:51 PM
To: Comments, CRD
Subject: Please consider the children of Georgia

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.

Ms. Jill Andrews,

As a mother of two young children, aged 11 and 4, I'm concerned about the impact of laws that affect our natural environment and the available public land that is left for the younger generations. I want my children to experience the amazing beauty of our state and learn that older generations value and seek to protect the land.

I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for everything you do!

Anjali Jarrett, Pharm.D.

Patrick, Diana

From: Maggie Van Cantfort <maggie@altamahariverkeeper.org>
Sent: Friday, July 24, 2026 3:52 PM
To: Comments, CRD
Cc: Andrews, Jill; Haymans, Doug
Subject: Dock rules comment
Attachments: ARK dock rules comment.pdf

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.

See attached.
Thank you,

--

Maggie Van Cantfort
Altamaha Coastkeeper
912-223-6073
altamahariverkeeper.org
facebook.com/AltamahaRiverkeeper

127 F St #204
Brunswick, GA 31520
(912) 223-6073
maggie@altamahariverkeeper.org



Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

RE: Proposed amendments to Subject 391-2-1 of the Rules of the Department of Natural Resources to establish rules for private docks located over state-owned tidal water bottoms

Altamaha Riverkeeper, inc is a 501(c)3 environmental advocacy organization with a mission to protect swimmable, drinkable, fishable waters for all. The coastal reach of our watershed is composed of a significant portion of Georgia's tidal marshlands - our estuary and our coastal communities depend on healthy, intact marsh habitat. Revisions to the private dock rules are needed; we appreciate the time that CRD put into this process. We also applaud the work of our conservation colleagues representing The Georgia Conservancy and One Hundred Miles on the stakeholder committee to advocate for marsh protection. We support the comments submitted to CRD by The Georgia Conservancy and One Hundred Miles.

The current draft does a lot to increase dock safety. However, the private dock rules, application process and enforcement actions need to do more to protect our public natural resources.

CRD needs to confirm private recreational dock (PRD) applicants legitimately meet all PRD requirements. Rules are pointless if they are not followed or enforced. One requirement for a PRD is that the applicant's lot must

- have a detached single-family residence located on high land adjoining such dock; or
- be 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.

However, CRD does not verify that an applicant's lot meets this requirement. Instead, CRD relies on confirmation via a letter provided by the municipality or county with jurisdiction where the lot is located. The failure of that system is that local governments do not have a process for providing accurate information to CRD to confirm that a lot is, in-fact, legally eligible for construction of a single-family residence per their local zoning ordinances *prior* to an owner applying for building permits. Therefore, a PRD application can potentially be approved for any size raw land with a minimum of 50 front feet of land abutting marshlands (assuming CRD verifies the frontage.)

Case in point:

CRD considered a PRD application for a parcel in McIntosh County with only 0.024 acre of upland, approximately 16 ft wide from east to west (see CTS 113980.) CRD moved this application forward even after several site visits to the property to investigate marsh fill complaints and witnessing the limited space available on the parcel. CRD staff did not reject the application outright after seeing in-person the size of the upland or after EPD measurements confirmed the size of upland, nor did CRD inquire further to confirm if zoning and septic system requirements could legitimately allow for a residence to be built on the parcel.

When asked for an explanation of why McIntosh County provided a letter for this PRD application confirming suitability, we received this response:

127 F St #204
Brunswick, GA 31520
(912) 223-6073
maggie@altamahariverkeeper.org



"No, there are no feasible circumstances under current McIntosh County zoning or Georgia Department of Public Health (DPH) regulations where a single-family residence with a septic system could be constructed on a 0.024-acre parcel. Such a parcel would fail to meet essential 'buildability' thresholds regarding minimum lot size for septic systems, residential side-yard setbacks...

Regarding the county's current administrative process:

- **Staffing and Verification:** McIntosh County does not currently have a professional engineer or surveyor on staff. Consequently, the county does not independently perform site measurements or verify Jurisdictional Determination (JD) lines. We rely on the documentation provided by applicants and state agencies at the time of a request.
- **Scope of "Non-Violation":** At present, I do not believe that the McIntosh County zoning ordinances contain specific restrictions or prohibitions against private recreational docks. Therefore, a "Letter of Non-Violation" issued by this office is strictly a certification that a proposal does not conflict with existing local zoning code. (However, maybe it does in some way by reference.)
- **The "Buildability" Catch-22:** We recognize the administrative gap where a parcel may receive a "non-violative" status for a dock while remaining entirely unbuildable for a residence. Currently, a parcel's alleged status as a "paper lot" does not legally preclude the issuance of a zoning compliance letter if no specific zoning violation exists.

April 13, 2026 email correspondence from Bryan Boone, McIntosh Co Director of Community Development & Regulatory Affairs

This McIntosh Co PRD application has been paused for reasons unrelated to the single-family residence suitability requirement. However, the application should be denied outright due to failing to meet the basic requirements for a private recreational dock site.

CRD cannot rely on local governments to confirm that a parcel meets PRD requirements – it is not their job to do CRD's work. The application requirements and CRD's process for evaluating applications needs to be revised to prevent this loophole and close any other loopholes that allow applicants to get around PRD and CMPA requirements.

Enforcement of derelict dock removal needs to be strengthened.

The PRD dock rules should include clearly stated requirements and enforcement measures for PRD owners to remove dock debris from waterways and marsh. Georgia's marshes are littered with floatation barrels, loose floating docks and other debris from damaged docks. Dilapidated docks are a public safety hazard, eyesore, and damage our public lands and waters. (See pictures enclosed.)

If PRD owners cannot be held accountable for removing abandoned docks and dock debris themselves, PRD applicants and owners should be required to pay fees to a dedicated fund for a removal program managed by CRD. PRD owners are granted the privilege to utilize public resources for their private recreation – are allowed the exclusive rights of use, excluding their neighbors and general public who lack marsh/waterfront property from equally enjoying our public resources – that privilege should come with a strictly enforced responsibility to not be a nuisance, to not damage the public resource, and to remove all debris and litter created by their docks and dock use.

127 F St #204
Brunswick, GA 31520
(912) 223-6073
maggie@altamahariverkeeper.org



Users of non-motorized vessels should receive equal treatment.

The PRD revision seems to be biased against kayaks, canoes and other small typically non-motorized vessels. All PRD applicants should be treated equally for size requirements and lifts needed. If a kayak or small sailboat owner requires a mechanized hoist to be able move their vessel in or out of the water, why should that be prevented? The purpose of the PRD is to provide access to water recreation. What is the rationale for excluding smaller vessels from use of the same type of tools and amenities that larger vessels are allowed?

Require turtle friendly, dark sky lighting

In addition to the lighting rules in the draft, the lighting regulations should specify that “turtle friendly” bulbs are used and that dock lighting that is not required for navigation safety must be turned off when the dock is not in use.

Minimize dock size

Private recreational docks should be limited to the minimum size necessary to safely reach deep water and to support the boat size allowed. The maximum size allowed should be below 0.10 acre total square footage.

Walkway width should be limited to safe width for accessing the dock for water-based recreation. Dock widths should not be based on golf cart or other non-ADA-required vehicle accessibility.

The PRD revision should expressly prevent owners of already existing, serviceable, good condition PRD from applying under the new rules to increase dock or walkway size.

The PRD revision should minimize variances and include specific, strict requirements for applying variances – “manner satisfactory to the department” is too vague.

Remove the variance for extension up to one-third of the waterway at MLW. If this variance remains in the regulation, variance requests should have to go to public comment as it is an increased removal of public waterway from public use, as well as increased navigation hazard.

Improve dock data

How many permitted docks are there in Georgia?

How much marshland is currently covered by dock structures?

How much marsh within a specific reach of waterfront is covered by dock structures?

This data should be readily available and publicly accessible. CRD needs to invest in modernizing record keeping and doing the work necessary to account for every existing dock structure (serviceable or not) within CRD’s jurisdiction. While a small percentage of Georgia’s entire marshland currently contains docks, the quantity of docks along densely populated sections of waterfront concentrates the damage to marsh ecosystems in that area – resulting in loss of the marsh ecosystem services that help filter water and protect inhabitants from flooding. CRD should be assessing the localized impacts of docks, not diluting data by including the total area of Georgia marsh in analysis of impact.

127 F St #204
Brunswick, GA 31520
(912) 223-6073
maggie@altamahariverkeeper.org



Thank you for your consideration of our comments.

Respectfully,

Maggie Van Cantfort
Coastkeeper
Altamaha Riverkeeper, inc

Enclosure: 5 photos of derelict docks and dock debris, taken July 20, 2026

Dock debris littering public marsh and waterway within a 615 ft stretch of marsh frontage



Patrick, Diana

From: Coastal Georgia Audubon Society <coastal.ga.audubon@gmail.com>
Sent: Friday, July 24, 2026 4:15 PM
To: Comments, CRD
Cc: Ben Carswell; Robert J Cooper
Subject: comment letter regarding proposed private dock rules
Attachments: CGAS_dock comment letter to DNR_7.24.2026.pdf

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.

Thank you for considering the attached comment letter regarding the proposed rules for private docks.

Kind regards,

Ben Carswell
President, Coastal Georgia Audubon Society

--

Coastal Georgia Audubon Society



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Submitted electronically to: crd.comments@dnr.ga.gov

Georgia Department of Natural Resources Board

c/o Ms. Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

RE: Comments on amendment of Subject 391-2-1 to establish rules for private docks in state owned tidal waters.

Dear Ms. Andrews and the Members of the Department of Natural Resources Board,

Thank you for the opportunity to submit comments regarding the new rules for private docks in state owned waters – Subject 391-2-1 (herein referred to as the draft rules). This letter is submitted on behalf of the 200 members of the Coastal Georgia Audubon Society (CGAS), a non-profit organization dedicated to the enjoyment and conservation of birds in the coastal Georgia region through civic engagement, conservation action, education, and advocacy. Since 2024 CGAS has supported the Department of Natural Resources' (DNR) efforts to codify standards governing revocable licenses for private docks. We appreciate the agency's commitment to establishing clear and transparent rules. However, **we do not support the draft rules released in June 2026. As written they introduce significant loopholes, depart from long-standing, science-based standards, and allow impacts to public marshlands that exceed what has historically been permitted under Georgia's coastal management framework.** Some of the details of our concerns are included in comments submitted by One Hundred Miles, a letter we co-signed. The purpose of this letter is to provide additional details on what we consider to be unacceptably harmful effects on bird populations that would likely be caused if the draft rules were implemented.

Our concerns focus on three species of birds on Georgia's coast that live their entire lives in salt marsh and are therefore considered marsh obligate species: Clapper Rail (*Rallus crepitans*), Worthington's Marsh Wren (*Cistothorus palustris griseus*), a non-migratory subspecies of Marsh Wren that is endemic to the southeast coast, and MacGillivray's Seaside Sparrow (*Ammospiza maritima macgillivrayii*), a subspecies of the Seaside Sparrow that is restricted to coastal South Carolina, Georgia and extreme Northern Florida. Because of their habitat specificity, ongoing threats to that habitat, and restricted range, all 3 species are ranked as being of high or highest conservation concern in the 2025 Georgia State Wildlife Action Plan (SWAP).¹ In addition, because of their rarity and restricted ranges, Worthington's Marsh Wren and MacGillivray's Seaside Sparrow are ranked as having critical global importance, the highest such designation in the 2025 SWAP. In addition, MacGillivray's Marsh Wren has been previously considered for threatened status under the U.S. Endangered Species Act, and is likely to be a candidate for listing again.

As breeding birds in tidal marshes, all 3 species face the dual threats of their nests being flooded during the highest tides each month and their nests being exposed to avian predators when placed high in marsh vegetation to escape flooding.² Avian nest predators include crows, grackles and other blackbirds,



raptors, herons, egrets and gulls, all of which regularly use docks as perch sites. Because docks provide observation platforms for predators, marsh obligate bird species have been shown to avoid docks and are less abundant in marshes with docks compared with dock-less marshes.³ In addition, large expanses of docks fragment the marsh, essentially turning a large area of marsh into smaller patches that decrease bird abundance and diversity.^{4,5}

Most concerning, the draft rules allow private recreational docks to exceed the baseline maximum dimensions currently allowed for commercial docks, community docks, and marinas under Georgia's Coastal Marshlands Protection Act. The draft rule will allow an increase in the allowable size of a private dock to include a 1,000 linear foot walkway (or 1,100 feet if a variance is granted) at six (6) feet wide, implying a total of 6,000-6,600 square feet. This footprint exceeds the legal definition of "minor alteration" of marshlands. Furthermore, because marsh bird species of concern avoid nesting near docks and because docks fragment marsh habitats, the area of marsh affected by docks far exceeds the area just covered by the physical dock.

We appreciate CRD's efforts to codify the standards and conditions governing the issuance of revocable licenses for private docks. Clear, consistent, and transparent rules are essential to balancing private access with protection of Georgia's publicly-owned tidal waterways. However, any new rule adopted by the DNR Board must be grounded in science, aligned with the intent of the Coastal Marshlands Protection Act, and informed by the decades of research documenting the environmental impacts associated with dock construction and expansion. For these reasons, the Board should amend the draft rules to restore meaningful limits on dock size, eliminate ambiguities that could allow expansion of existing structures, and ensure that any departures from established standards are supported by objective scientific review. The State should not weaken longstanding protections to accommodate larger private recreational docks. Georgia's coastal marshlands are a public resource held in trust for present and future generations, and the rules governing their use must reflect that responsibility.

Thank you for your service to the State and for your careful consideration of these concerns and recommendations. Please contact us at any time for clarification or additional information.

Sincerely,

Robert J. Cooper
Past President
Coastal Georgia Audubon Society

Signed by:

961EB077948743E

Ben Carswell
President
Coastal Georgia Audubon Society



Citations:

- ¹ GA State Wildlife Action Plan: <https://ga-state-wildlife-action-plan-gadnrwrld.hub.arcgis.com/>
- ² Hunter, E. A., N. P. Nibbelink, and R. J. Cooper. 2016. Threat predictability influences seaside sparrow nest site selection when facing trade-offs from predation and flooding. *Animal Behaviour* 120:135-142. <http://dx.doi.org/10.1016/j.anbehav.2016.08.001>
- ³ Banning, E. A., and J. L. Bowman. 2009. Effects of Long Piers on Birds in Tidal Wetlands. *Journal of Wildlife Management* 73:1362-1367. <https://doi.org/10.2193/2007-571>
- ⁴ Benoit, L. K., and R. A. Askins. 2002. RELATIONSHIP BETWEEN HABITAT AREA AND THE DISTRIBUTION OF TIDAL MARSH BIRDS. *The Wilson Bulletin* 114(3), 314-323. [https://doi.org/10.1676/0043-5643\(2002\)114\[0314:RBHAAT\]2.0.CO;2](https://doi.org/10.1676/0043-5643(2002)114[0314:RBHAAT]2.0.CO;2)
- ⁵ Shriver, W. G., T. P. Hodgman, J. P. Gibbs, and P. D. Vickery. 2004. Landscape context influences salt marsh bird diversity and area requirements in New England. *Biological Conservation* 119:545-543. <https://doi.org/10.1016/j.biocon.2004.01.016>

Patrick, Diana

From: Alan Shedd - Mindspring [REDACTED] >
Sent: Friday, July 24, 2026 4:27 PM
To: Comments, CRD
Subject: Comments on Proposed Rules for Private Docks

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Thanks for the opportunity to comment on the proposed rules. In general, we are in favor of creating a set of rules, requirements, and processes governing private recreational docks.

We are not in favor of the of the revision that allows for construction of fixed walkways of 1,000 to 1,100 feet in length and 6 feet wide. [Section 391-2-1-.04 (4)] We feel that this is excessive. The large area of the walkway can cause harm to the fragile ecosystem. Construction of the walkway will do more harm given the number of pilings that must be set to support the walkway. With the maximum height at 6 feet above MHW, the potential for damage from storm surge is significant with all of that material ending up in the marsh and waterway. We question whether construction of long walkways like this really make sense in the first place. Not all marsh front properties should be dockable.

Thanks for your consideration.

- Alan

Alan and Cheryl Shedd
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Patrick, Diana

From: Cynthia Gaya <[REDACTED]>
Sent: Friday, July 24, 2026 3:14 PM
To: Comments, CRD
Subject: Comment re Proposed private dock rules

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.

Good afternoon,

I am writing to express my concern for proposed lengthening of larger, longer docks along Georgia's coast. We are lucky to still have many intact public marshes. These provide critical habitat for fish, shellfish, and other sensitive marine wildlife including many bird species and turtles. They also protect our fragile coastline, serving as filters to keep water clean. Public docks serve the public and are useful for access to our marshes.

Large private docks, however, threaten the ecosystem and destroy shared views. More and longer docks will result in irreversible ecological damage and should not be permitted. Please do not increase the 3000 square foot maximum limit currently in place. This is short-sighted and does not protect the interests of the general public. Please don't sell out to business.

Thank you for considering my opinions on this important issue.

Cynthia Gaya
[REDACTED]
[REDACTED]

Patrick, Diana

From: Betsy Cain <civinput@newmode.io>
Sent: Friday, July 24, 2026 4:31 PM
To: Comments, CRD
Subject: Public comment for private dock standards

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 Ms. Jill Andrews and members of the DNR Board,

Thank you for the opportunity to comment on the new rule establishing standards for private recreational docks in state owned waters and marshes held in the public trust for all citizens.

In 2007 our close but non-adjacent neighbor applied for and was permitted (fast tracked) to build an 880" foot extension to his existing 100' dock. We rallied support from twenty neighbors with a signed letter asking for him to reconsider since we anticipated damage to our marsh and shallow creeks from this structure. Our concerns were marsh damage from such a long dock, wrack accumulation, disrupted viewshed and the fact that wharfing out this distance for a minimal advantage of deeper water but not deep water. Ours is a shallow tidal basin in the middle of Wilmington Island. There were not any existing docks of this length within our substantial viewshed. They were more on the south end of the island for deep water on Half Moon River.

Subsequently, after the dock was built it collected approx 7 acres of wrack on its north side, and blocked all creeks including ours. Within time the accumulation suffocated the marsh underneath from the heavy inundation. We organized help to physically move the wrack out into deeper water. Despite the fact that the marsh is resilient and wants to thrive, we have witness the slow impacts to the marsh from this dock: creek collapse, marsh degradation slowly turning into dead pan salt flats and because of the loss of marsh more flooding on our property.

We support 100 Miles in their effort to raise genuine concern of a large majority of citizens who care and value this vital and important resource.

Thanks you, Betsy Cain

for I support CRD's efforts to codify dock standards for Georgia's coast but ask that the rules impose stronger limits on the size and footprint of private docks.

The draft rule allows private docks to far exceed the standards of surrounding states and to exceed the threshold of 1/10 acres of wetland impacts regulated by the Coastal Marshlands Protection Act. Also, the new rule introduces far too many loopholes that will allow dock owners to exceed the original footprint of their dock on reconstruction and expand already built, functional docks. A variance process is unnecessary and introduces confusion into an already complicated process.

I recommend CRD do the following to strengthen the draft rules:

- Return to the 3,000 sq. feet maximum for the dock walkway employed during the previous regulatory processes. Allowing 6,000 sq. feet for the walkway is unnecessary and will only encourage new and existing docks to support golf carts.
- Incorporate a public process allowing adjacent property owners to comment on whether a new dock will impact their viewshed or marsh experience.
- Require that any reconstructed docks comply with the original footprint of the unserviceable parts of dock as a whole. Clarify that currently existing docks that are undamaged and functional cannot be modified or rebuilt simply to achieve a 6-foot wide walkway.
- Define multi-family docks and clarify the application process for demonstrating joint ownership or changes to multi-family dock status.
- Eliminate the variance process.

While I support the rulemaking, introducing such lax requirements for obtaining a license to impact state-owned marshlands will have lasting impacts on our coastal landscape.

Thank you for considering my comments,
Betsy Cain





July 20, 2026

Ms. Jill Andrews
Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way
Brunswick, Georgia 31520

Dear Ms. Andrews:

We refer to the public notice dated June 24, 2026 titled *Notice of Proposed Regulation Change: Proposed Amendments to Rules for Private Docks over State-Owned Tidal Water Bottoms, Rules 391-2-1.01-.09, Creating Rule 391-2-1.09*, soliciting comments on the proposed rule.

Myrick Marine Contracting Corporation assists Georgia property owners with obtaining authorization to construct private docks in tidal waters and participated in the Private Recreational Dock Rulemaking Stakeholders Committee. As you may recall, the Stakeholders Committee issued its initial report on February 11, 2025. Because many committee members believed the proposed rules required further discussion, additional meetings were held, followed by a line-item vote on the relevant provisions. The results were published on July 28, 2025, as a “minority report,” although this process represented the first occasion on which participating members voted individually on each proposed rule provision. In several instances, the majority-supported positions differed from those reflected in the original committee report.

The rule as currently proposed does not incorporate several recommendations supported by a majority of participating committee members. MMCC has also received feedback from numerous affected property owners. In light of our participation in the stakeholder process, our practical experience constructing docks throughout coastal Georgia, and the concerns expressed by property owners, we respectfully offer the following comments.

391-2-1-.03 Issuance of a Revocable License

(2)(d) Private docks shall access waterways with a defined channel and not ponded areas/mudflats.

Comment: Many riparian properties front areas that may be classified as “ponded areas” or “mudflats.” Although these areas may not contain a clearly defined channel, property owners could still benefit from a conventionally constructed dock that complies with all applicable length, siting, and size requirements. Such structures would continue to serve legitimate water-dependent purposes, and their environmental effects would not materially differ from those of docks located along defined channels that contain little or no water during portions of the tidal cycle. Property owners would simply be responsible for planning access to and from the structure according to tidal conditions.

391-2-1-.04 Standards and Conditions of New Private Docks

(2) A private dock must terminate at the first waterway measuring 20 feet wide or greater at MHW. A waterway that is less than 20 feet wide at MHW may be spanned by a fixed walkway, provided no pilings are placed in the waterway and the bottom of the span is at least six feet above MHW, or higher as determined by the department to be necessary for safe navigation.

Comment: We respectfully recommend removing this restriction. Many riparian properties could otherwise obtain access to a larger waterway capable of supporting deep-water access and a functional dock for water-dependent activities. Under the proposed standard, some property owners would be limited to constructing a minimally functional crabbing or fishing pier on a narrow waterway that provides little or no practical vessel access to tidal waters. Each proposed dock should instead be evaluated based on site-specific conditions, navigational considerations, environmental impacts, and the intended water-dependent use.



(4) One fixed walkway, up to 1,000 linear feet in length and up to six feet wide, may provide access from the upland, and must be built at a height to clear all vegetation, but not more than six feet above MHW. Handrails and supports must be illustrated on scaled drawings. No walkway extensions are permissible on new private docks.

Comment: The six-foot walkway-width limitation should apply to the usable walking surface and should not include handrails, curbs, or similar safety components. Additionally, walkway length should not be subject to an absolute 1,000-foot limitation. Applications exceeding that length should instead be evaluated individually based on site conditions, environmental impacts, and available avoidance and minimization measures.

1. Based on GIS analysis of current aerial imagery, an estimated 3,453 private docks presently exist along Georgia's coast. Even if every existing dock contained a six-foot-wide walkway, elevated walkways would occupy only approximately 0.025% of Georgia's coastal marshlands. This represents a very limited overall footprint.
2. Modern dock designs incorporate avoidance and minimization practices that significantly reduce environmental impacts. Unlike historical causeways constructed with fill, elevated walkways do not eliminate marsh habitat. Their primary potential effect is limited shading of tidal vegetation. Multiple studies evaluating private docks within Georgia's approximately 368,000 acres of marsh indicate that these effects are limited, with some assessments suggesting that as much as 85% of marsh function is maintained beneath elevated walkways.
3. Where a proposed walkway exceeds 1,000 feet, additional design requirements could be used to further minimize impacts. These may include light-penetrating decking materials, increased spacing between pilings, and greater walkway elevation above marsh vegetation.
4. Geographic conditions and the substantial cost of constructing and maintaining lengthy docks already limit both the number and length of docks constructed along Georgia's coast. The relatively small number of docks developed over the state's long coastal history demonstrates this practical limitation.

Considering the limited footprint of modern dock construction, the availability of alternative construction methods, and the substantial costs that naturally restrict excessively long structures, an absolute maximum walkway length is neither necessary nor proportionate to the protection of coastal resources. A site-specific review process would provide appropriate environmental protection while allowing reasonable access to tidal waters.

(6) A private dock to a waterway 20 feet wide or greater may have a fixed deck with a maximum area of 400 square feet, including gangway landings and cantilevered components, and may not be located over vegetation. Fixed deck(s) may be roofed per Rule 391 2-1-.04 (11) and partially enclosed where the lower three feet consists of a single layer of woven screen wire or wainscot and the upper section is open or finished in woven screen wire.

Comment: Small gangway landings, generally measuring six feet by six feet or less, should not be included in the maximum allowable 400-square-foot fixed-deck area. These landings are sometimes necessary to provide safe and practical access between the fixed structure, gangway, and floating dock. When located over unvegetated areas, they create no meaningful additional impact to tidal vegetation or waterways.

(8) Floating docks should be pile supported, shall not rest on the water bottom at MLW or must be cradled and must not be located over vegetation. Gangways accessing a floating dock(s) do not count toward the maximum area but must be indicated on the scaled drawing.

(a) Single family dock: The maximum area of a floating dock(s) is 600 square feet.

Comment: The rule should include a variance process allowing a floating dock to exceed 600 square feet when an applicant demonstrates a legitimate need, including the accommodation of a larger vessel, multiple



vessels, unusual site conditions, or necessary safety and access considerations. Any such variance could remain subject to site-specific review and applicable environmental and navigational requirements.

(12) Utilities to be extended to the private dock, including electrical and water, must be described in the application. Applicant must provide proof of application for a local electrical permit before a revocable license is issued.

Comment: Rather than requiring proof of an electrical-permit application before issuance of the revocable license, the license should be conditioned upon the applicant obtaining all required local electrical permits before utilities are installed or the dock becomes operational. Some local jurisdictions may be unable or unwilling to process an electrical-permit application based solely on the preliminary hand-drawn plans accepted as part of the revocable-license application. Requiring the electrical application at that stage could unnecessarily delay dock authorization and create significant scheduling difficulties for property owners and contractors without providing an additional environmental benefit.

391-2-1-.06 Maintenance of Existing Private Docks

Licensees must maintain private docks within their existing footprint. Before starting any maintenance, the licensee must notify the department to determine serviceability and requirements for a new revocable license. If the department deems the private dock or its parts are unserviceable, it cannot be maintained; however, it may be reconstructed or modified according to Rule 391-2-1-.05.

(1) Board-for-board maintenance using only hand tools will not require a new revocable license, provided the requirements of Rule 391-2-1-.08(1) have been met.

Comment: Routine maintenance, including the replacement of deck boards, handrails, fasteners, and similar components within the existing authorized footprint, should not require prior notification to the Department. Such work does not expand or materially alter the structure and is necessary to keep docks safe and serviceable. Notification should be reserved for maintenance activities that alter the authorized dimensions, location, configuration, or environmental impact of the structure.

(2) Maintenance activities involving the use of heavy machinery, a barge, or a crane, or that involve the installation or replacement of pilings, will require a new revocable license.

Comment: In-kind replacement of damaged or deteriorated pilings within the existing authorized footprint is a common and necessary maintenance activity and should not require issuance of a new revocable license. Requiring a new license for routine piling replacement could delay essential repairs and allow otherwise serviceable structures to become unsafe. Prior notification or a simplified maintenance authorization could be required when heavy equipment is necessary, while reserving a new revocable license for work that changes the dock's footprint, dimensions, location, or configuration.

391-2-1-.07 Variances

(1) The department may grant a variance allowing the length of the fixed walkway on a new private dock to exceed 1,000 feet for the sole purpose of accessing the waterway nearest to the upland. Such walkway exceedance shall not exceed ten percent of the standard allowable length (i.e., 100 feet) and must constitute the shortest route to the waterway, as determined by the department.

Comment: Walkway length should not be governed by an absolute maximum or by a variance limited to only 10% above the proposed 1,000-foot standard. Applications for longer walkways should instead be evaluated individually based on site conditions, environmental impacts, navigational considerations, and the availability of reasonable avoidance and minimization measures.



For walkways exceeding 1,000 feet, the Department could require measures such as light-penetrating decking, increased piling spacing, greater elevation above marsh vegetation, or other site-specific design features. Elevated walkways do not result in the direct loss of marsh habitat associated with filled causeways; their principal potential impact is limited shading of vegetation. When the limited impacts of modern dock construction, available design alternatives, and significant construction costs are considered together, a strict maximum length is not necessary to protect coastal resources.

Additional Comment: The variance provisions should also authorize floating docks larger than 600 square feet when an applicant demonstrates a legitimate need, including accommodation of a larger vessel, multiple vessels, unusual site conditions, or necessary safety considerations.

391-2-1-.09 Inspections; Revocation, Suspension or Modification of Revocable License; Penalties

(1) Private docks are subject to compliance inspections by department staff without prior notice. An as-built post-construction survey may be required; such survey shall comply with the Georgia Plat Act, O.C.G.A. §15-6-67 et seq.

Comment: Except in emergencies or when the Department has a reasonable basis to believe an immediate violation or environmental threat exists, compliance inspections should be conducted only after reasonable notice has been provided to the property owner or licensee. Prior notice would respect private-property interests, allow the owner or representative to be present, and provide an opportunity to make permits, plans, and maintenance records available to Department personnel without materially limiting the Department's enforcement authority.

My Kindest regards,

A handwritten signature in black ink, appearing to read 'James Myrick', is positioned above the printed name.

James Myrick
President

JM/jl

July 22, 2026

Post Office Box 3112
Sea Island, GA 31561

Ms. Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

Dear Ms. Andrews,

Today, I am writing to ask the Georgia Coastal Resources Division "CRD" to re-draft the rules related to private recreational docks and include more measures that are protective of our marshes and surrounding property.

I live on Sea Island and my view and quality of life have been negatively impacted by the docks constructed South of my home. Even though I vehemently opposed the creation of my neighbor's dock, the Georgia CRD issued a permit for its construction (see the attached letter from my attorney Amanda Willilams). Ms. Williams' letter outlines the substantial impact my neighbor's dock will have on the unobstructed view that led my husband and me to buy the property more than 40 years ago.

The salt marshes belong to the people of Georgia. And the Georgia CRD must control how much harm can be allowed from privately owned docks. The Georgia CRD must enact rules that:

- Protect the wildlife in our marshes and prevent excessive fragmentation.
- Involve a public review process for new private dock applications. Private docks are having a negative impact on my view and enjoyment of shared marsh. The agency must not allow one property owner to diminish the value and enjoyment of surrounding neighbors. Surrounding landowners must be provided accurate drawings of the proposed dock. And our support/opposition must be heavily considered in the agency's decision to issue the permit or to deny it.
- Limit construction of boat hoists because they have a substantial impact on surrounding landowners view and possibly navigation.
- Consider if the applicant is a full-time resident, a part time resident or a landlord of the property from which the dock is proposed. The docks around my home are never

used. Maybe the owners visit once a year, but the permanent impact for minimal use is absurd. Alternatively, friends of mine have a neighboring dock that is used solely for parties. Such party docks are incongruous with our quiet neighborhood character and are not good for our quality of life.

- Include a maximum square foot limit for new and reconstructed docks. Not every landowner needs a 6-foot wide dock, so the rule should minimize the footprint as much as possible to reduce the impact.

Please make these changes to the draft rule. Our marshes are precious and must be protected for the next generation.

Sincerely,

A handwritten signature in black ink that reads "Margret Sovey". The script is cursive and fluid.

Margret Sovey

[REDACTED]t
[REDACTED]
[REDACTED]

AMANDA F. WILLIAMS
ATTORNEY AT LAW

TELEPHONE
(912) 289-2482

FACSIMILE
(912) 550-4477

April 6, 2026

Overnight Mail

Re: Adjacent Property Owner Notification
Notice of Intent to Construct A Private Recreational Dock

Dear Mrs. McKay:

I represent Mr. and Mrs. Sovey concerning the above-referenced matter. Please be advised that my clients are vehemently opposed to your Plans for the construction of the dock and boathouse as presented to them. The Notification and Plans as sent to us is attached hereto for all purposes as Exhibit A. The Plans do not properly reflect the project as it would be on the ground. Furthermore, your Plans obstruct my client's view of the marsh and waterfront and make it impossible to see anything from their view behind their home but your proposed construction project.

It is too close to their property line and their property line's "line of sight". Your project squeezes their unobstructed view, especially due to the hammock to the right of their property. Given the proximity and positioning of this Plan, the effect on their property is substantial, not minor. With this in mind, please consider reexamining your plans, especially the placement of the dock and boathouse. Further please remember the environment is altered due to the increased noise and lighting.

Please respond accordingly.


Amanda F. Williams
Attorney for Sovey

**ADJACENT PROPERTY OWNER NOTIFICATION
NOTICE OF INTENT TO CONSTRUCT A
PRIVATE RECREATIONAL DOCK**

To: Adjacent Landowner The Sorey Family
(name)

PO Box 31102 Sea Island GA 31561
(address) (city) (state) (zip)

This notification is to advise you that I/we have applied for a recreational dock facility. The Georgia Department of Natural Resources and U.S. Army Corps of Engineers require that you, as an adjacent property owner, be notified. The applicant or agent for the applicant has been instructed to provide you with a copy of the project drawings along with this document.

From: Applicant Elizabeth W McKay
(name)

[REDACTED]
(project location address) (city) (state) (zip)

[REDACTED]
(lot number) (subdivision)

☐ As an adjacent landowner, I have been notified of the proposed work, have reviewed the proposed plans, and **do NOT object** to the issuance of a permit for the project, as proposed.

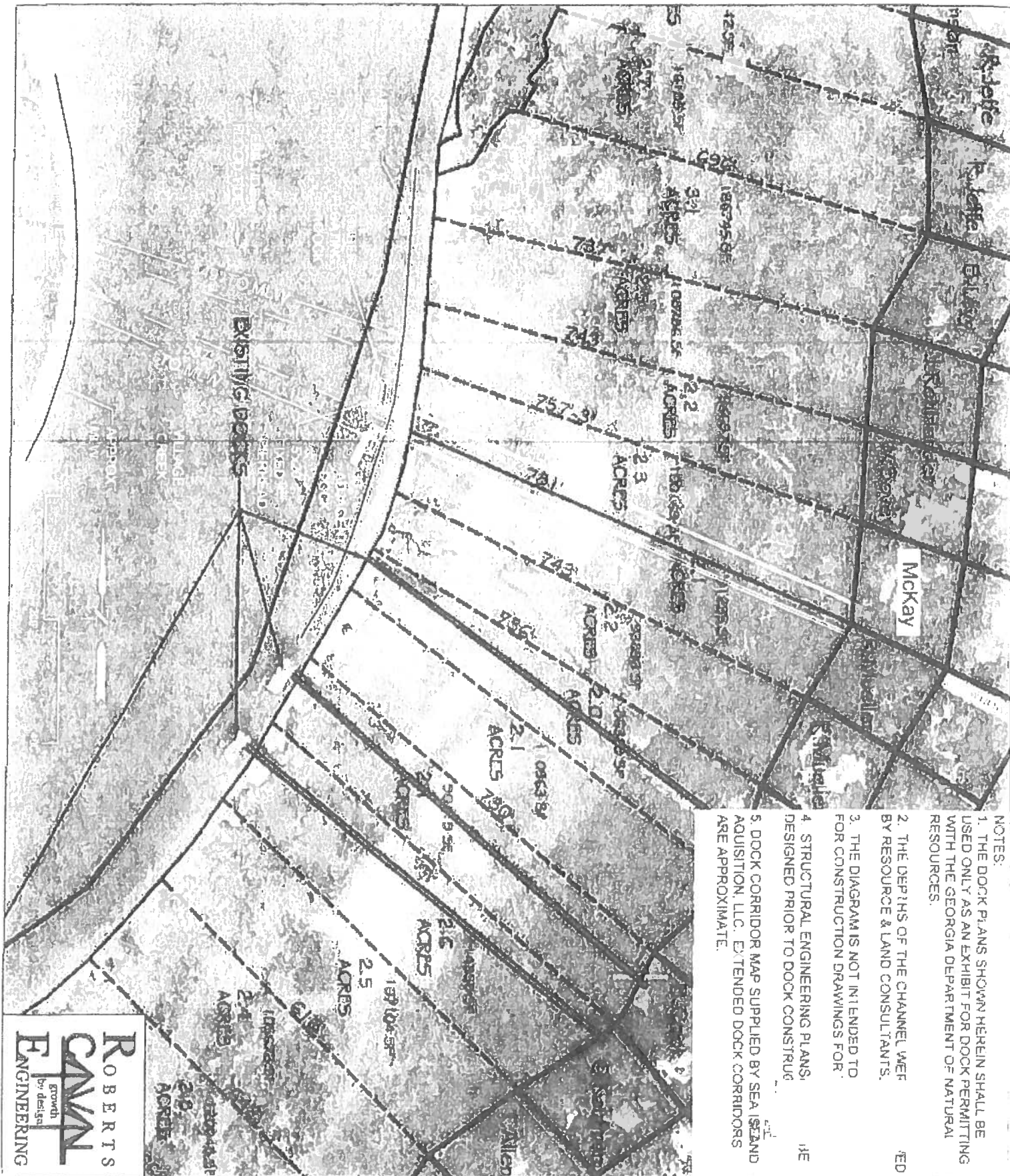
☒ As an adjacent landowner, I have been notified of the proposed work, have reviewed the proposed plans, and **object** to the issuance of a permit for the project, as proposed, for the following reasons.

* See letter from Amanda Williams

Bill + Margaret Sorey
Adjacent Landowner Signature

4-6-2026
Date

Exhibit A



- NOTES:**
1. THE DOCK PLANS SHOWN HEREIN SHALL BE USED ONLY AS AN EXHIBIT FOR DOCK PERMITTING WITH THE GEORGIA DEPARTMENT OF NATURAL RESOURCES.
 2. THE DEPTHS OF THE CHANNEL WERE BY RESOURCE & LAND CONSULTANTS.
 3. THE DIAGRAM IS NOT INTENDED TO FOR CONSTRUCTION DRAWINGS FOR
 4. STRUCTURAL ENGINEERING PLANS, DESIGNED PRIOR TO DOCK CONSTRUCT
 5. DOCK CORRIDOR MAP SUPPLIED BY SEA ISLAND ACQUISITION, LLC. EXTENDED DOCK CORRIDORS ARE APPROXIMATE.

ROBERTS CIVIL ENGINEERING

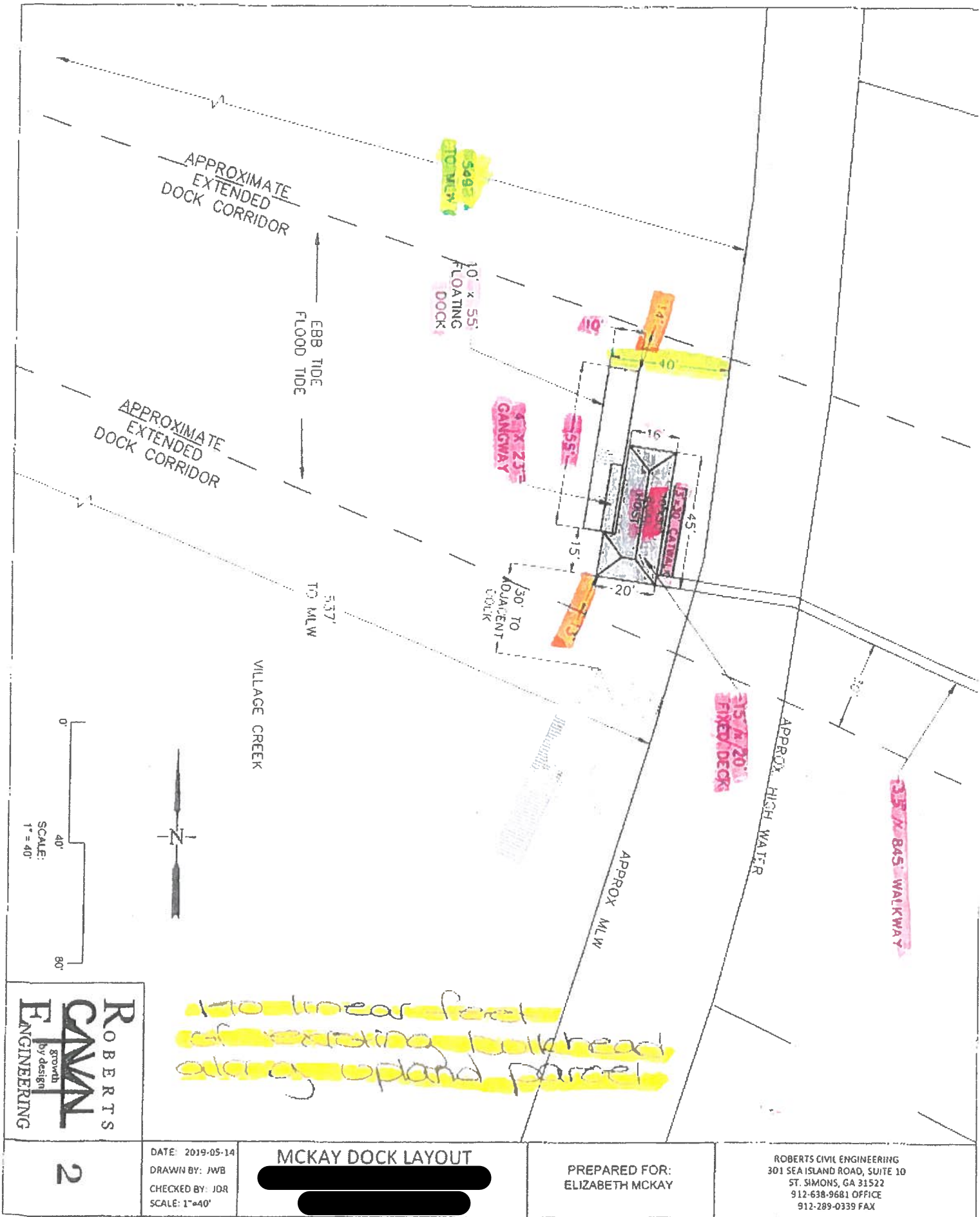
growth by design

DATE: 2019-05-15
DRAWN BY: JWB
CHECKED BY: JDR
SCALE: 1"=200'

MCKAY DOCK SITE PLAN

PREPARED FOR:
ELIZABETH MCKAY

ROBERTS CIVIL ENGINEERING
121 SEA ISLAND ROAD, SUITE 15
ST. SIMONS, GA 31522
912-638-9681 OFFICE
912-638-9681 CELL



DATE: 2019-03-26
DRAWN BY: JWB
CHECKED BY: JDR
SCALE: 1"=40'

MCKAY DOCK RIVER PROFILE
[REDACTED]
[REDACTED]

PREPARED FOR:
ELIZABETH MCKAY

ROBERTS CIVIL ENGINEERING
301 SEA ISLAND ROAD, SUITE 10
ST. SIMONS, GA 31522
912-638-9681
Attachment B

MATCHLINE

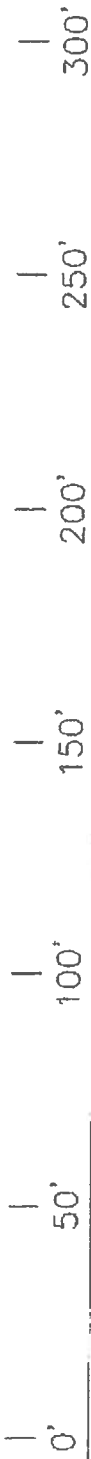


MLW

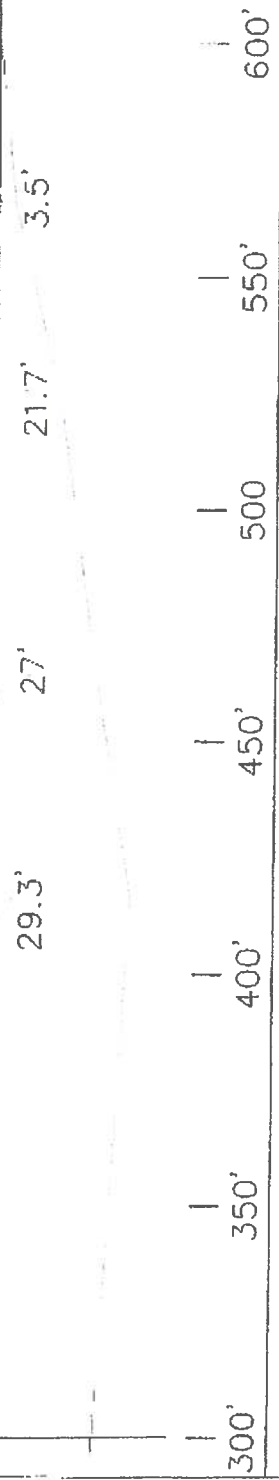
21.6'

17.7'

7.5'



MATCHLINE



29.3'

27'

21.7'

3.5'

July 21, 2026

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

Email: crd.comments@dnr.ga.gov

**Re: Notice of Proposed Regulation Change: Proposed
Amendments to Rules for Private Docks over State-Owned
Tidal Water Bottoms, Rules 391-2-1-.01 through 391-2-1-.08,
Creating Rule 391-2 -1.09.**

Dear Ms. Andrews:

Please accept these comments in response to the above-noted proposed rule. My name is Pat Farrell, and I serve as Chatham County Commissioner for District 4. I am also a resident of Skidaway Island and avid outdoorsman. In particular, I love to fish and boat along the Georgia coast. I was asked to serve on the Private Recreational Docks (PRD) Stakeholder Committee for these rules and attended numerous meetings through 2025 regarding regulation of private docks. I write in response to the maximum dock dimensions addressed in the proposed rules as well as the proposed variance process excerpted below.

391-2-1-.07 Variances

- (1) The department may grant a variance allowing the length of the fixed walkway on a new private dock to exceed 1000 feet for the sole purpose of accessing a waterway nearest to the upland. Such walkway exceedance shall not exceed ten percent of the standard allowable length (i.e., 1000 feet) and constitute the shortest route to the waterway, as determined by the department.**

It is my view that there should be no limit to the length or width of docks on the coast. I have studied this issue closely during the stakeholder process and asked CRD repeatedly for data which would support the need for these draconian dock specification limitations, in particular the length limits. I have reviewed the 2012 Report funded by the Army Corps of Engineers on the Cumulative Impacts of Private Recreational Docks in Coastal Georgia. The minor cumulative impacts noted in the Corps report certainly do not justify the proposed dock walkway limitations. For instance, the report projects marsh shading from docks and walkways of less than 1/10 of a percent by 2030. During the stakeholder process, I asked repeatedly for cumulative impacts data in addition to the Corps study which would help landowners and the public understand the science which would form the basis for such a limitation. Such information was never provided to the stakeholders.

The only data that we received related to marsh impacts from PRDs came in the form of a presentation of a 2006 study by Clark Alexander at Skidaway Institute stating that dock shading reduces the density of marsh under docks and anecdotal evidence around how marsh rack can be trapped by dock pilings. The study demonstrates that docks don't even block all growth, just a reduction in density of the marsh.

If a landowner on the Georgia Coast needs to build a walkway that is 1500 feet or longer in order to access deep water, he or she should be allowed to do so. CRD has produced no evidence showing that this will have any significant impact on the ecology of the coast. Given that fact, this agency should not arbitrarily restrict a riparian landowner's ability to access deep water and in turn the value of that upland parcel. Moreover, the cost of modern dock construction on the coast guarantees that few riparian landowners would even be able to afford the construction of such a longer dock. As I stated at the DNR Board meeting in June at FDR State Park, the length of docks is "self-regulating." There simply will not be that many long docks that landowners are willing to construct. Thus, when combined with the fact that no cumulative impacts data exist to suggest that PRDs are causing significant environmental impacts on the Georgia Coast, setting a maximum length limit for walkways is not justified or necessary.

I strongly recommend striking any maximum walkway length limitation from these proposed rules.

Sincerely,

/s/ Pat Farrell

Pat Farrell



Scott K. Steilen
President and CEO

July 23, 2026

crd.comments@dnr.ga.gov

Jill Andrews
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

Dear Jill:

As President and CEO of Sea Island Company, I write in support of the **“proposed amendment of Subject 391-2-1 of the Rules of the Department of Natural Resources to establish rules for private docks in state owned tidal waters”**.

Many Sea Island residents have taken full advantage of access to our coastal waterways. At present there are 38 docks constructed along the marshes and tributaries of the Black Banks River and Village Creek.

On the north end from 45th Street to 56th Street, there are 11 docks which extend several hundred feet to Village Creek. We estimate an additional 10 more deepwater dock opportunities. The current guidelines, which limit marsh coverage to 3,000 square feet, force unreasonably narrow walkways of 3' to 4.5' to meet the standard. Such narrow walkways fail to optimize safety and practicality, especially for seniors, and children. The proposed rule change allowing for a 6' walkway certainly provides for more practical transport of equipment and supplies; and, most importantly, enhancement of emergency rescue capability. In that regard, the 6' maximum width should not include handrailing or curbing, as required by Sea Island in place of visually prominent handrails. Without a revision to the existing 3,000 SF maximum policy, most of the future docks will be restricted to walkways of 4' or less width due to their distance to the deep water of Village Creek.

On a very positive note, this amendment imposes only a very small impact on our coastal marshes. We are told by consultants that Georgia marshes comprise approximately 368,000 acres in which an estimated 91.7 acres (0.025% of total marsh area) of private dock walkways have been constructed. In addition, we are told that the approval of the proposed amendment could add only approximately 601.5 acres of potential dock walkways bringing future potential impacts to 0.163% of the total marsh area, a very modest amount.

In closing, on behalf of Sea Island Company, I urge the adoption of this amendment that provides for much safer and practical access to our coastal waters at minimum harm to our marshes.

Sincerely,

Scott K. Steilen