Patrick, Diana

From: Hayden Mundy [redacted]
Sent: Wednesday, August 26, 2026 5:18 PM
To: Comments, CRD
Subject: Proposed dock construction licensing.

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,

My name is Hayden Mundy and I am a resident of coastal Liberty county. I'm in the process of starting my own dock repair and marine construction business.. I don't really have any comments on the matter, more so questions about licensing process and requirements..

Question one, will there be a regulatory agency that provides guidelines for education and licensing?

Questions two & three, Will it be a one time registration process with renewal? Will there be continuing education to keep the license active?

Question four, will it be an individuals license or a business license that blankets the whole company?

Question five, will this require a State of Georgia General contractors license?

I am neither currently for or opposed to the implementation of licensing for dock builders, but I would like to understand the facts so I can form my own opinion.

Thanks,

Hayden W. Mundy
[redacted]

Patrick, Diana

From: wimfl@aim.com
Sent: Friday, August 28, 2026 8:54 AM
To: Comments, CRD
Subject: 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.

Please DON'T allow the docks to be bigger. This is public land.

Sent from the all new AOL app for iOS

Patrick, Diana

From: [redacted]
Sent: Friday, August 28, 2026 9:00 AM
To: Comments, CRD
Subject: 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.

I am writing as a concerned citizen to strongly urge you to include electrical safety requirements and periodic electrical inspections in the proposed updates to regulations governing private docks.
I became aware of this issue following the tragic death of a recent high school graduate, who was electrocuted as a result of unsafe electrical conditions associated with a private dock in Glynn County. The investigation that followed reportedly identified numerous electrical violations, including the absence of proper grounding. His death brought attention to a very serious gap in the way electrical systems on private docks are regulated and inspected.

If private dock regulations are being reviewed and updated, electrical safety should not be left out of that conversation.

Water and electricity are an inherently dangerous combination. That risk is even greater along the Georgia coast, where electrical components are continuously exposed to saltwater, corrosion, high tides, flooding, tropical storms, and other harsh environmental conditions. Even a system that was properly installed initially can deteriorate and become dangerous over time.

I respectfully ask that the updated regulations include, at minimum:

• A requirement for dock permit applications to disclose whether electrical power will be installed or supplied to the dock.

• A requirement that electrical installations on docks be completed and/or inspected by a licensed electrician and comply with all applicable electrical codes.

• Periodic electrical safety inspections for any dock with electrical service, such as an inspection every five years.

• Additional inspections following substantial electrical modifications or significant storm or flood damage that could compromise the electrical system.

• A clearly designated authority responsible for ensuring these requirements are followed.

It is especially concerning that electrical oversight of private docks has previously been described as a regulatory "gray area," with uncertainty about which agency or jurisdiction bears responsibility. That should not be a reason to exclude electrical safety from these regulations. It should be a reason to address it.

Other areas in Georgia have already implemented periodic electrical inspection requirements for certain docks. There is no reason coastal communities, where environmental conditions can be particularly destructive to electrical equipment, should not have similar protections.

Regulations address dock construction, size, environmental impacts, boat hoists, and other aspects of private docks. Surely protecting human life from electrical hazards deserves equal consideration.

Kale's death demonstrated that this is not a hypothetical risk. A person has already lost his life. We should not wait for another tragedy before establishing clear responsibility and reasonable safety requirements.

Please use this opportunity to close this regulatory gap and include meaningful, enforceable electrical safety provisions in the updated private dock regulations. Requiring the owner of a powered dock to obtain a periodic inspection from a licensed electrician is a reasonable burden when the purpose is preventing electrocution and potentially saving a life.

Thank you for considering this issue and for working to make Georgia's waterways safer for everyone who enjoys them.

Sincerely,

Crystal Adams

Glynn Co. Resident

Patrick, Diana

From: Scott Revels <[redacted]>
Sent: Friday, August 28, 2026 9:16 AM
To: Comments, CRD
Subject: Dock 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 find it hard to believe that a dock over 5 football fields long could be allowed over our marshes. Think about how much debris could be scattered in the marsh and rivers after a storm just from one of those long docks. There are plenty of public docks along the Georgia coast that people have access to that are a very short walk to the water, much less a mile liong, Also allowing a dock to span a creek of 20ft could cut off access to fishing areas that even a jon boat couldn't get through. Please keep the common sense rules in place. Thanks

--
Scott Revels
[redacted]

This is a staff email account managed by Glynn County School District. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender.

Patrick, Diana

From: Jennifer Hufstetler <[redacted]>
Sent: Friday, August 28, 2026 9:18 AM
To: Comments, CRD
Subject: Dock revision comment.

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 Whom It May Concern,

I am writing as a concerned citizen to strongly urge you to include electrical safety requirements and periodic electrical inspections in the proposed updates to regulations governing private docks.

I became aware of this issue following the tragic death of a young man, who was electrocuted as a result of unsafe electrical conditions associated with a private dock in Glynn County. The investigation that followed reportedly identified numerous electrical violations, including the absence of proper grounding. His death brought attention to a very serious gap in the way electrical systems on private docks are regulated and inspected.

If private dock regulations are being reviewed and updated, electrical safety should not be left out of that conversation.

Water and electricity are an inherently dangerous combination. That risk is even greater along the Georgia coast, where electrical components are continuously exposed to saltwater, corrosion, high tides, flooding, tropical storms, and other harsh environmental conditions. Even a system that was properly installed initially can deteriorate and become dangerous over time.

I respectfully ask that the updated regulations include, at minimum:

• A requirement for dock permit applications to disclose whether electrical power will be installed or supplied to the dock.

• A requirement that electrical installations on docks be completed and/or inspected by a licensed electrician and comply with all applicable electrical codes.

• Periodic electrical safety inspections for any dock with electrical service, such as an inspection every five years.

• Additional inspections following substantial electrical modifications or significant storm or flood damage that could compromise the electrical system.

• A clearly designated authority responsible for ensuring these requirements are followed.

It is especially concerning that electrical oversight of private docks has previously been described as a regulatory "gray area," with uncertainty about which agency or jurisdiction bears responsibility. That

should not be a reason to exclude electrical safety from these regulations. It should be a reason to address it.

Other areas in Georgia have already implemented periodic electrical inspection requirements for certain docks. There is no reason coastal communities, where environmental conditions can be particularly destructive to electrical equipment, should not have similar protections.

Regulations address dock construction, size, environmental impacts, boat hoists, and other aspects of private docks. Surely protecting human life from electrical hazards deserves equal consideration.

Kale's death demonstrated that this is not a hypothetical risk. A person has already lost his life. We should not wait for another tragedy before establishing clear responsibility and reasonable safety requirements.

Please use this opportunity to close this regulatory gap and include meaningful, enforceable electrical safety provisions in the updated private dock regulations. Requiring the owner of a powered dock to obtain a periodic inspection from a licensed electrician is a reasonable burden when the purpose is preventing electrocution and potentially saving a life.

Thank you for considering this issue and for working to make Georgia's waterways safer for everyone who enjoys them.

Sincerely,

Jennifer Hufstetler
Concerned Georgia Citizen

Patrick, Diana

From: Jeannine Moss <[redacted]>
Sent: Friday, August 28, 2026 9:23 AM
To: Comments, CRD
Subject: Private Docks and Electrical Inspections

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 Whom It May Concern,

I am writing as a concerned citizen to strongly urge you to include electrical safety requirements and periodic electrical inspections in the proposed updates to regulations governing private docks.

I became aware of this issue following the tragic death of a young man, who was electrocuted as a result of unsafe electrical conditions associated with a private dock in Glynn County. The investigation that followed reportedly identified numerous electrical violations, including the absence of proper grounding. His death brought attention to a very serious gap in the way electrical systems on private docks are regulated and inspected.

If private dock regulations are being reviewed and updated, electrical safety should not be left out of that conversation.

Water and electricity are an inherently dangerous combination. That risk is even greater along the Georgia coast, where electrical components are continuously exposed to saltwater, corrosion, high tides, flooding, tropical storms, and other harsh environmental conditions. Even a system that was properly installed initially can deteriorate and become dangerous over time.

I respectfully ask that the updated regulations include, at minimum:

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• A requirement that electrical installations on docks be completed and/or inspected by a licensed electrician and comply with all applicable electrical codes.

• Periodic electrical safety inspections for any dock with electrical service, such as an inspection every five years.

• Additional inspections following substantial electrical modifications or significant storm or flood damage that could compromise the electrical system.

• A clearly designated authority responsible for ensuring these requirements are followed.

It is especially concerning that electrical oversight of private docks has previously been described as a regulatory "gray area," with uncertainty about which agency or jurisdiction bears responsibility. That should not be a reason to exclude electrical safety from these regulations. It should be a reason to address it.

Other areas in Georgia have already implemented periodic electrical inspection requirements for certain docks. There is no reason coastal communities, where environmental conditions can be particularly destructive to electrical equipment, should not have similar protections.

Regulations address dock construction, size, environmental impacts, boat hoists, and other aspects of private docks. Surely protecting human life from electrical hazards deserves equal consideration.

Kale's death demonstrated that this is not a hypothetical risk. A person has already lost his life. We should not wait for another tragedy before establishing clear responsibility and reasonable safety requirements.

Please use this opportunity to close this regulatory gap and include meaningful, enforceable electrical safety provisions in the updated private dock regulations. Requiring the owner of a powered dock to obtain a periodic inspection from a licensed electrician is a reasonable burden when the purpose is preventing electrocution and potentially saving a life.

Thank you for considering this issue and for working to make Georgia's waterways safer for everyone who enjoys them.

Sincerely,

Jeannine Moss
Concerned Georgia Citizen

Patrick, Diana

From: Deborah Ferrell <[redacted]>
Sent: Friday, August 28, 2026 9:29 AM
To: Comments, CRD
Subject: 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.

To Whom It May Concern,

I am writing as a concerned citizen to strongly urge you to include electrical safety requirements and periodic electrical inspections in the proposed updates to regulations governing private docks.

This is personal for me as my nephew was electrocuted and died as a result of unsafe electrical conditions associated with a private dock in Glynn County. The investigation that followed reportedly identified numerous electrical violations, including the absence of proper grounding. His death brought attention to a very serious gap in the way electrical systems on private docks are regulated and inspected.

If private dock regulations are being reviewed and updated, electrical safety should not be left out of that conversation!

Water and electricity are an inherently dangerous combination. That risk is even greater along the Georgia coast, where electrical components are continuously exposed to saltwater, corrosion, high tides, flooding, tropical storms, and other harsh environmental conditions. Even a system that was properly installed initially can deteriorate and become dangerous over time.

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• A requirement that electrical installations on docks be completed and/or inspected by a licensed electrician and comply with all applicable electrical codes.

• Periodic electrical safety inspections for any dock with electrical service, such as an inspection every five years.

• Additional inspections following substantial electrical modifications or significant storm or flood damage that could compromise the electrical system.

• A clearly designated authority responsible for ensuring these requirements are followed.

It is especially concerning that electrical oversight of private docks has previously been described as a regulatory "gray area," with uncertainty about which agency or jurisdiction bears responsibility. That should not be a reason to exclude electrical safety from these regulations. It should be a reason to address it.

Other areas in Georgia have already implemented periodic electrical inspection requirements for certain docks. There is no reason coastal communities, where environmental conditions can be particularly destructive to electrical equipment, should not have similar protections.

Regulations address dock construction, size, environmental impacts, boat hoists, and other aspects of private docks. Surely protecting human life from electrical hazards deserves equal consideration.

This is not a hypothetical risk. A person has already lost his life. It could happen to anyone! We should not wait for another tragedy before establishing clear responsibility and reasonable safety requirements.

Thank you for considering this issue and for working to make Georgia's waterways safer for everyone who enjoys them.

Sincerely,

Deborah Ferrell
Concerned Georgia Citizen

Sent from my iPhone

Patrick, Diana

From: Taylor, Alicia <[redacted]>
Sent: Friday, August 28, 2026 10:11 AM
To: Comments, CRD
Subject: 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.

I am writing to request your attention to ongoing dock safety concerns, particularly regarding electrical systems and the need for consistent inspection and enforcement requirements.
Electrical equipment on docks can create serious safety hazards when installations are outdated, improperly maintained, or not inspected by qualified professionals. I respectfully request that DNR review and enforce applicable regulations requiring electrical inspections for docks and associated electrical systems.

Given the potential risks to property and personal safety, I believe consistent enforcement of electrical inspection requirements is important to ensure that docks remain safe and compliant with applicable regulations. A young man lost his life due to electrocution in which numerous violations were discovered during the investigation. His death was 100% avoidable!!!!

Dock owners should be responsible for ensuring that their docks comply with all applicable safety, electrical, and permitting requirements. This responsibility should include maintaining electrical installations in a safe condition, correcting identified hazards, and obtaining required inspections by qualified electrical professionals

Please let me know what steps DNR can take to address these concerns and whether there is a process for reporting docks that may not be in compliance.
Thank you for your attention to this matter. I would appreciate a written response regarding the applicable requirements and enforcement procedures.

Thank you,

Alicia Taylor
[redacted]

Patrick, Diana

From: Phillip Kidney <[redacted]>
Sent: Friday, August 28, 2026 11:28 AM
To: Comments, CRD
Subject: Kale Stephens

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.

Our children's safety is more important than the marsh grass. End of story.

Georgia has approximately 400,000 thousand acres of marshland that is protected is so many other ways. If docks are going to be allowed at all they should be built and inspected the right way.

Also most damage I see that is being done to the marsh grass is down by Glynn County itself. When they mow the shoulder of road 303 they are literally mowing 4 feet plus of marsh grass. Every single time Is it cut.

Sent from my iPhone

Patrick, Diana

From: Raymond Jones <[redacted]
Sent: Friday, August 28, 2026 12:56 PM
To: Comments, CRD
Subject: Docks with electricity should be inspected and have codes

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 grown up in Brunswick on the rivers and the coast all my life and I did not realize that there was not a code for electricity. I was very involved with my mother-in-law renovating a dock in River Ridge, and there was all kind of permitting and proposals that had to be sent in. I never once thought about electricity. It was on the dock. We didn't have any trouble with that. Putting electricity on the dock should have the same guidelines as the renovation or adding of any type of dock over the marsh, water.

Dow Jones

Patrick, Diana

From: Amy Bullard <[redacted]>
Sent: Friday, August 28, 2026 1:19 PM
To: Comments, CRD
Subject: Coastal Ga 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.

There needs to be INSPECTIONS!! The docks electricity should be inspected yearly. If this was regulated, Kale Stephens may still be here today. Instead, his mother, father, sister, brother and family are living a life without him. There are so many concerns with the length/ width of docks, damage to the marsh, sea life and debris in the rivers. When did all of this become more import than human life? Shelia Stephens (Kale's mother) has been to county meetings, has written Brunswick News and reached out to so many more try to make a change. Everyone just views her as a broken mother and this is not a common problem. She has a LIST of how many times someone has been electrocuted and was injured or died due to faulty wiring on docks. Does it take a county official or their family member being injured or worse, killed? If you have enough money to build the dock... You have enough to maintain it!

Amy Bullard
Glynn County resident

Patrick, Diana

From: Jennifer Anderson <[redacted]>
Sent: Friday, August 28, 2026 1:29 PM
To: Comments, CRD
Subject: Comments on Revised 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.

To Whom this May Concern:

Regarding the current discussion on the requirements for electrical inspections of docks and dock areas, I'm at a loss as to why this is even a discussion? When you are combining two volatile entities like WATER AND ELECTRICITY wouldn't it be prudent to make sure that safety is of the utmost concern?
I understand that there is an environmental concern about too much shade on the marsh and the length and breadth of the dock is also an environmental concern. Having said that, isn't electrocution a concern as well? Wildlife can suffer electrocution, because of improperly grounded electrical work, just as easy as the elderly. Which, both of these groups were advocated for at the last meeting.
I would like to advocate for the young man and his family that have already suffered a tremendous loss due to the inconsistency of requirements for electricity use on docks across Glynn County. Kale Stephens lost his life due to the inappropriate wiring on these docks and failures to inspect on these docks. This was a very young man, fresh from high school graduation, with his whole life ahead of him just doing his job. Within seconds, his life was ended due to an ungrounded electrical system on a neighboring dock. A senseless loss of life just to cut corners on construction.
If Northern Georgia (I.e. Lake Lanier) has guidelines and rules regarding electricity for their dock owners, why don't we? We are a COASTAL community; it should be even that much more regulated.
Please consider this terrible oversight at your next meeting. Invite Tony and Shelia Stephens to speak on their deceased son's behalf and STOP this from happening to anyone else.

Thank you for your consideration.

Patrick, Diana

From: William Juraschek <[redacted]>
Sent: Friday, August 28, 2026 3:25 PM
To: Comments, CRD
Subject: Revised Regulations Private 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.

As a citizen of Glynn county I feel it is unconscionable for this subject to arise.
Particularly since it is for the benefit of a very limited number of well to do individuals.
Not the general public at large.
I can accept the widening to 4 foot in order to allow wheelchair access but not any further width or length.

This is an opinion of course but I'm certain many would be more amendable to something more "Sensible" as related above.
Thank you for your time.

Sincerely,
William L. Juraschek
St. Simons Island

Patrick, Diana

From: Patricia Varnadore <[redacted]>
Sent: Friday, August 28, 2026 4:13 PM
To: Comments, CRD
Subject: Disabled and Handicapped

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.

If we deny these folks access then we are in violation of federal law folks. Every property owner should have the right to access and use there property. Maybe the folks that are resource envious should as some have worked two or three jobs to enjoy there property. Thank you Sent from my iPhone

There are regulations for pools and there should be regulations for docks especially if they have electricity running on them. If a dock is on the river it should be required that a licensed electrician run a service check annually and it must be posted in a specific place on the dock just as if the building inspector signs off on a building/home under construction. If there are any problems it must be taped off completely around the entire dock as "keep out electrical shock" until such repairs are made. (Public and Private)

Patrick, Diana

From: 9122665386@vzwpix.com
Sent: Saturday, August 29, 2026 6:05 AM
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.

Patrick, Diana

From: Kimberly Bryant <[redacted]>
Sent: Saturday, August 29, 2026 6:44 AM
To: Comments, CRD
Subject: Electrical inspections for 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.

Hello,

Please make changes to see that all docks with electricity are safe!

A young man lost his life due to working on a dock that wasn't grounded. This could/should have been avoided if someone was regulating the use of electricity on docks!

Kim Bryant
Brunswick, GA
Sent from my iPhone

Patrick, Diana

From: james finklea <[redacted]>
Sent: Saturday, August 29, 2026 3:01 PM
To: Comments, CRD
Subject: 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.

Nature to be protected and seen, and I am very happy for those who can afford a boat and are able to go further up stream and injoy it. Yet it discourges me see it littered and damaged with partial shading by those who can afford to go up stream. The marshes are what make GA. so picturesque and helpfull to making better days when viewed by residence and tourist. Twenty years or less from now either to crwoded or docks falling a part or getting in the way of other boats due to climate change; a thousand feet further is a long way, will become a tax burden, also I have noted that many of the docks have no boat at all perhaps at liest there should be additional Tax at liest for using public space unnecessarily(I am old too, to bad). Extending and widening docks bad idea, especially for those who do not own a boat worthy of such monsterous space. if indeed it is for property value make them pay deeply to ruin our MARSH be for or after sale of property make no differince. If you have a boat go up stream and injoy what many of us do not get to see often.

Patrick, Diana

From: Carla Hall <[redacted]>
Sent: Saturday, August 29, 2026 5:54 PM
To: Comments, CRD
Subject: 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.

Dear Sir and/or Madam:

I am writing to you as a citizen of Glynn County where there are many, many docks over the water. A couple of years ago, there was a terrible accident which was highly preventable in my subdivision at a home with a dock. A young man, my step-daughter's son, who had a twin brother was electrocuted while walking off of the dock due to faulty wiring. It was devastating to our entire family and the community. What is even more devastating is that there are no regulations regarding electricity on docks in our county. It is unthinkable to me that there are regulations for size, length, height, and how it affects the environment but no regulations or schedule for regular inspections are in place. Often there are hoists which require electricity still with no regulations. During a local meeting regarding dock regulations, the question of responsibility of oversight and regulations were not addressed and barely acknowledged. This oversight in regulating and monitoring electricity and electrical components of a dock must be included in the Dock Regulations. A young man's life was ended shortly after graduation from high school. This would NOT be a huge undertaking to include this in updated Dock Regulations and could save others from the horrifying incident that my family experienced.

Please seriously consider and address this issue and add that any dock permit application should include a requirement to disclose whether power will be run to a dock. Also add that persons be required to install any and all electric components properly. Finally all electrical components should be should be subject to regular inspections.

Sincerely,

Carla K Hall

Patrick, Diana

From: Robert Stewart <[redacted]>
Sent: Saturday, August 29, 2026 6:44 PM
To: Comments, CRD
Subject: Corridor Deviation

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 there,

My home in Savannah has an existing dock that only reaches a tidal creek, not deep water, and I'm exploring whether a new dock could instead reach deep water by angling across the marsh — which would mean crossing outside my own extended property line into my neighbor's riparian corridor. This would turn the 70' dock into a ~500' dock while a direct line from my property to deep water is well over 1000'. Before pursuing surveys or engineering, I'd like to understand how likely CRD would be to approve a variance for that kind of corridor deviation, and whether the private dock rules currently under revision (final board action expected Oct. 27) could affect that process. Is this something you can help me better understand?

All the best,

-Robert Stewart

Patrick, Diana

From: Amethea Keyser <[redacted]>
Sent: Tuesday, September 1, 2026 9:37 AM
To: Comments, CRD
Cc: Sheila Stephens
Subject: 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.

Dear Georgia Department of Natural Resources,

I am writing to respectfully ask that the Department of Natural Resources consider strengthening the regulations and safety requirements surrounding private docks, specifically by requiring annual electrical inspections and certification.

This issue is deeply personal to me. In June 2023, our community experienced the devastating loss of Anthony "Kale" Stephens, who lost his life on Oak Grove Island. Kale was working a summer construction job when a board fell into the water. He jumped in to retrieve it, and the current carried him to the neighboring dock. After climbing out, he walked down the dock and was tragically electrocuted by faulty electrical wiring. His death left behind a family and community forever changed.

I work beside Kale's mother every day, and I witness firsthand the grief and devastation she continues to carry. The loss of her son is not something that simply goes away with time. I see the pain of a mother who has had to learn how to live with an unimaginable loss, and it is heartbreaking.

While nothing can bring Kale back, I believe something positive can come from his story. We have an opportunity to learn from this tragedy and take steps to prevent another family from experiencing the same kind of loss.

I respectfully ask the DNR to consider requiring private docks with electrical service to undergo annual electrical inspections by a qualified, licensed professional, with documentation confirming that the electrical system is safe and compliant. Clear requirements for inspection, maintenance, grounding, wiring, and GFCI protection could help identify dangerous conditions before they result in another tragedy.

This is not about placing blame. It is about protecting lives.

I hope the circumstances surrounding Kale's death will encourage meaningful discussion and stronger safety standards for Georgia's private docks. One day, we hope these efforts can become known as "Kale's Law"—a lasting reminder that his life mattered and that his loss helped make Georgia's waterways safer for others.

Thank you for taking the time to hear our concerns and for considering changes that could save lives.

With sincere respect,

Amethea Davis



Patrick, Diana

From: Jon Stevenson <[redacted]>
Sent: Thursday, September 3, 2026 10:07 AM
To: Comments, CRD
Subject: Private dock revisions

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 whom it may concern

I am staunchly opposed to the revisions proposed for private docks along the coast of Georgia. I see few benefits except for wealthy coastal property owners and deem them unnecessary for access to coastal waterways. Who needs a 6 ft wide dock so you can drive a golf cart up to your vessel. Handicap access is still possible as the current width will accommodate a wheelchair. In addition the possible damage to our fragile marshes is too risky to make these changes.

Jon Stevenson
Jekyll Island, GA

Patrick, Diana

From: Catherine Lovett <civicinput@newmode.io>
Sent: Tuesday, September 8, 2026 5:08 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few. Personally, I find the surprising considering how hard it was for me after our doc broke a storm and I had to go through every hoop with the DNR, the US Army core, and even a county permit for just putting back what I had and had to make it even smaller than the

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely, Catherine Lovett Savannah, Georgia

[redacted]

Patrick, Diana

From: Catherine Lovett <[redacted]>
Sent: Tuesday, September 8, 2026 5:11 PM
To: Comments, CRD
Subject: Protect protecting OUR Marsh

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 Members of the Georgia Department of Natural Resources Board and Coastal Resources Division:

Thank you for the opportunity to comment on the proposed rules governing private docks in Georgia's state-owned tidal waters. I sincerely appreciate everything you do to keep George and all of our natural resources so valuable and special. I was disheartened to hear about this new possible change in the law. Honestly, we had the hardest time after a storm broke our own dock that had been built in 1980 and I had to go through every hoop, which I did took me a year to get a permit to put back less of what I lost, get a federal permit, and also a county permit. I really value y'all trying to keep things special and safe so I really am confused how this all flipped, our marsh is so unique and so valuable and unlike anyone else's in the world that this would be devastating to the impact on so many levels. Please really look in your heart of hearts and think is this really what is in the best interest of our special place.

As a resident of coastal Georgia, I appreciate DNR's effort to establish clear and consistent rules for private docks. Property owners should have reasonable access to our waterways. At the same time, that access must be balanced with our responsibility to protect Georgia's salt marshes and tidal waters, which belong to all Georgians and are held in trust for future generations.

I am concerned that the proposed rules allow private dock walkways to be as much as six feet wide and 1,500 feet long without establishing an overall limit on the amount of public marsh that an individual dock may cover.

The issue is not whether Georgians should be allowed to have private docks. The question is how much of a public natural resource should be occupied by a private structure and what safeguards should be in place.

I respectfully ask DNR to strengthen the proposed rules in several important ways:

- **Establish a meaningful maximum size for private docks.** To comply with the standard established in the Coastal Marshlands Protection Act, the total impact of a private dock over state-owned tidal water bottoms should not exceed 0.10 acre to be considered minor. This would continue to provide flexibility for property owners while limiting the amount of public marsh affected by an individual private dock.
- **Require larger docks or exceptions to be justified by need and science.** Exceptions should not be granted simply because a larger structure is desired. Any departure from established standards should consider impacts such as marsh shading, habitat fragmentation, navigation, water quality, wildlife, viewsheds, and neighboring properties.

- **Clarify the rules for rebuilding and modifying existing docks.** The regulations should not unintentionally create a pathway for older, smaller docks to be expanded to the larger new standards simply because they require repair or reconstruction.
- **Provide meaningful notice and public review when exceptions are requested.** Adjacent property owners and the public should have sufficient information and an opportunity to comment when a proposed dock could have greater impacts on shared waterways and marshlands.
- **Improve oversight and accountability.** Georgia should maintain an accurate database of private docks, consider reasonable application fees to support DNR review and enforcement, and establish professional standards for dock construction.

Georgia's salt marsh is one of our state's greatest natural assets. It protects our communities, supports wildlife and fisheries, and is central to the character and economy of our coast. Once these public marshlands are fragmented or impaired, the consequences can extend well beyond an individual property.

I urge DNR to adopt clear, science-based standards that provide reasonable private water access while keeping protection of Georgia's publicly owned marshes and tidal waterways at the center of these regulations.

Thank you for your consideration and for your stewardship of Georgia's coastal resources.

Sincerely,

Catherine Lovett
Savannah, Georgia

—Catherine

Patrick, Diana

From: CATHERINE GUSSLER <civicinput@newmode.io>
Sent: Wednesday, September 9, 2026 10:19 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
CATHERINE GUSSLER
[redacted]

Patrick, Diana

From: Lucy Crosswell <civicinput@newmode.io>
Sent: Wednesday, September 9, 2026 11:10 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Lucy Crosswell
[redacted]

Patrick, Diana

From: Atkinson <[redacted]>
Sent: Wednesday, September 9, 2026 11:36 AM
To: Comments, CRD
Subject: Comment Private Docks from Cort Atkinson
Attachments: Comment Letter on Docks From Cort Atkinson.docx

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Attached for your consideration are my comments regarding proposed changes to Georgia Dock Regulations.

Thank you for considering my views on this important issue,

Cort Atkinson

Dear Members of the Georgia Department of Natural Resources Board and Coastal Resources Division:

Thank you for the opportunity to comment on the proposed rules governing private docks in Georgia's state-owned tidal waters.

As a resident of coastal Georgia, I appreciate DNR's effort to establish clear and consistent rules for private docks. Property owners should have reasonable access to our waterways. At the same time, that access must be balanced with our responsibility to protect Georgia's salt marshes and tidal waters, which belong to all Georgians and are held in trust for future generations.

I am concerned that the proposed rules allow private dock walkways to be as much as six feet wide and 1,500 feet long without establishing an overall limit on the amount of public marsh that an individual dock may cover.

The issue is not whether Georgians should be allowed to have private docks. The question is how much of a public natural resource should be occupied by a private structure and what safeguards should be in place.

I respectfully ask DNR to strengthen the proposed rules in several important ways:

- **Establish a meaningful maximum size for private docks.** To comply with the standard established in the Coastal Marshlands Protection Act, the total impact of a private dock over state-owned tidal water bottoms should not exceed 0.10 acre to be considered minor. This would continue to provide flexibility for property owners while limiting the amount of public marsh affected by an individual private dock.
- **Require larger docks or exceptions to be justified by need and science.** Exceptions should not be granted simply because a larger structure is desired. Any departure from established standards should consider impacts such as marsh shading, habitat fragmentation, navigation, water quality, wildlife, viewsheds, and neighboring properties.
- **Clarify the rules for rebuilding and modifying existing docks.** The regulations should not unintentionally create a pathway for older, smaller docks to be expanded to the larger new standards simply because they require repair or reconstruction.
- **Provide meaningful notice and public review when exceptions are requested.** Adjacent property owners and the public should have sufficient information and an opportunity to comment when a proposed dock could have greater impacts on shared waterways and marshlands.
- **Improve oversight and accountability.** Georgia should maintain an accurate database of private docks, consider reasonable application fees to support DNR review and enforcement, and establish professional standards for dock construction.

Georgia's salt marsh is one of our state's greatest natural assets. It protects our communities, supports wildlife and fisheries, and is central to the character and economy of our coast. Once these public marshlands are fragmented or impaired, the consequences can extend well beyond an individual property.

I urge DNR to adopt clear, science-based standards that provide reasonable private water access while keeping protection of Georgia's publicly owned marshes and tidal waterways at the center of these regulations.

Thank you for your consideration and for your stewardship of Georgia's coastal resources.

Sincerely,

Cort Atkinson
Savannah, Georgia

Patrick, Diana

From: Cort Atkinson <civicinput@newmode.io>
Sent: Wednesday, September 9, 2026 11:59 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Cort Atkinson
[redacted]

Patrick, Diana

From: Sheila Stephens <[redacted]>
Sent: Wednesday, September 9, 2026 2:12 PM
To: Comments, CRD
Subject: FW: 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

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Can someone please respond and let me know who I need to contact? This is an important matter that needs to be addressed instead of getting golf carts on docks!!!!! I do plan to attend the next meeting and the next and the next and THE NEXT.

Thank you for your help

From: Sheila Stephens
Sent: Monday, July 13, 2026 4:16 PM
To: crd.comments@dnr.ga.gov
Subject: Private dock fatality - Letter from parents

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.

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

Sincerely, Shelia and Tony Stephens

attachment: refrences.

~~James D. Shafer~~
Capt. David E. Rifkin
Quality Marine Services, LLC
2418 Fallen Tree Drive West
Jacksonville, FL 32246
904-382-7868
qualitymarinesvcs@comcast.net

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

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.

Capt. David Rifkin
USN, Ret.

Quality Marine Services, LLC
qualitymarinesvcs@comcast.net

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 gounding 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 (L5-30) 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	Parr 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.	July18, 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 mfgr. had deliberately **not** installed the AC grounding wire to the boats 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 gounding 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 unkown) 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 treatement 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 chafled 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 zincs 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	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.

Inspection Summary – [redacted], September 1, 2023

1. The accident occurred at approximately 4:45pm on 6/12/23, in brackish water.

2. [redacted] was performing work at the dock for [redacted] was a contract worker for [redacted]

3. After the accident, [redacted] disconnected dock power from the service entrance to [redacted] 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.



Lab Exam Summary – [redacted], 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.

[redacted]

Patrick, Diana

From: Beth Remmes <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 5:26 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Beth Remmes
[redacted]

Patrick, Diana

From: Barbara Stahnke <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 7:06 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Barbara Stahnke
[redacted]

Patrick, Diana

From: Christina Williams <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 7:26 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Christina Williams
[redacted]

Patrick, Diana

From: Whitney Edenfield <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 7:29 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Whitney Edenfield
[redacted]

Patrick, Diana

From: JANICE MEIER <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 7:40 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
JANICE MEIER
[redacted]

Patrick, Diana

From: Rebecca Lang <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 7:41 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Rebecca Lang
[redacted]

Patrick, Diana

From: Nancy Maier <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 7:52 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Nancy Maier
[redacted]

Patrick, Diana

From: Ruth Wilson <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 7:53 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 resident of Tybee Island, I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Ruth Wilson
[redacted]

Patrick, Diana

From: William Kehoe <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 7:53 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
William Kehoe
[redacted]

Patrick, Diana

From: Duressa Pujat <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 8:03 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross. I live on Saint Simons Island and therefore very concerned about the damage to the marsh and marine life that this expansion will promote. Real Estate interest and the wealthy have too much influence on these decisions.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Duressa Pujat
[redacted]

Patrick, Diana

From: Jennifer Taylor <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 10:17 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jennifer Taylor
[redacted]

Patrick, Diana

From: Julie Sutton <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 10:50 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Julie Sutton
[redacted]

Patrick, Diana

From: Kirk Whalen <civicinput@newmode.io>
Sent: Thursday, September 10, 2026 11:14 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to accept the current draft rule for private docks.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users.

Sincerely,
Kirk Whalen
[redacted]

Patrick, Diana

From: joyce cotter <civicinput@newmode.io>
Sent: Friday, September 11, 2026 12:25 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
joyce cotter
[redacted]

Patrick, Diana

From: Victoria Weeks <civicinput@newmode.io>
Sent: Friday, September 11, 2026 12:34 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Sincerely,
Victoria Weeks
[redacted]

Patrick, Diana

From: Margaret Kelly <civicinput@newmode.io>
Sent: Friday, September 11, 2026 5:45 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Margaret Kelly
[redacted]

Patrick, Diana

From: Lucy Crosswell <civicinput@newmode.io>
Sent: Friday, September 11, 2026 6:46 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am a life-long Georgian who has grown up with and currently own a private dock. I'm so alarmed by the proposol of the CRD to lengthen docks to a maximum of 1500 feet (thats five football fields) without any bases? We kept our dock as short in length as possible to lessen the impact on our salt marsh and are currently building a living shoreline, but I see the abuse and visual pollution of long docks all around us that stretch out over the salt marsh so long that they rarely are used like docks built closer to homes.

I am also concerned about the use and safety of golf carts on docks, especially by young and elderly people. There is little to no room for error on a dock for a misjudgement or turn, and hope the CRD will responsibility make rules to discourage this dangerous trend of golf carts on docks.

So I'm writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Lucy Crosswell
[redacted]

Patrick, Diana

From: Jenny Watkins <civicinput@newmode.io>
Sent: Friday, September 11, 2026 6:50 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jenny Watkins
[redacted]

Patrick, Diana

From: Lori Norden <civicinput@newmode.io>
Sent: Friday, September 11, 2026 7:12 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Lori Norden
[redacted]

Patrick, Diana

From: Lori Norden <civicinput@newmode.io>
Sent: Friday, September 11, 2026 7:12 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Lori Norden
[redacted]

Patrick, Diana

From: Dale Thorpe <civicinput@newmode.io>
Sent: Friday, September 11, 2026 7:21 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

OVER FIFTY YEARS AGO SCIENCE EDUCATED US ON THE VALUE OF THE SALT MARSH FOR NUTURING THE VALUABLE FOOD RESOURCES OF THE RIVERS. PLEASE DO NOT ALLOW THE PERMITTING OF BIGGER PRIVATE DOCKS. DOCKS ARE DETRIMENTAL TO THE HEALTH OF THE MARSH WHICH IS A VALUABLE ASSET TO HEALTH OF OUR COMMUNITY.

DALE THORPE

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Dale Thorpe
[redacted]

Patrick, Diana

From: Alex Dileo <civicinput@newmode.io>
Sent: Friday, September 11, 2026 9:12 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to **reject** the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules to prioritize common sense conservation while still allowing for private enjoyment (as is already the case). As a daughter of the Georgia coast with many family members still living in homes on the water (on the Ogeechee River, Richardson Creek on Whitmarsh Island, etc.), I am no stranger to the enjoyment of a private dock. But even those of us with the luxury of regular use know well enough to know that our private interests don't outweigh the public good, now and for future generations. We can't get back the marsh we damage through reckless rules like those in this proposal.

The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Alex Dileo
[redacted]

Patrick, Diana

From: David Weitnauer <civicinput@newmode.io>
Sent: Friday, September 11, 2026 9:45 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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,

Georgia's salt marsh is a public resource. We already have rules in place that allow private land owners to build extremely long walkways to access docks, **triple** what is allowed now. Be clear: the proposed change is being driven by homeowners on Sea Island. Please reject the draft rules.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
David Weitnauer
[redacted]

Patrick, Diana

From: Charon Sharp <civicinput@newmode.io>
Sent: Friday, September 11, 2026 10:49 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Charon Sharp
[redacted]

Patrick, Diana

From: Ann Bullock <civicinput@newmode.io>
Sent: Friday, September 11, 2026 11:39 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Ann Bullock
[redacted]

Patrick, Diana

From: Gerald Haram <civicinput@newmode.io>
Sent: Friday, September 11, 2026 1:02 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 live on Edisto Island, SC. I do not believe that dock length and volume should be expanded as this is an impediment to the free movement of wildlife. The marsh is the most important resource that we have. It should not be compromised by unreasonable dock expansion.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Gerald Haram
[redacted]

Patrick, Diana

From: Linda Mahoney <civicinput@newmode.io>
Sent: Friday, September 11, 2026 1:06 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Linda Mahoney
[redacted]

Patrick, Diana

From: Donna Haram <civicinput@newmode.io>
Sent: Friday, September 11, 2026 1:21 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Donna Haram
[redacted]

Patrick, Diana

From: John Schacke <civicinput@newmode.io>
Sent: Friday, September 11, 2026 2:03 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
John Schacke
[redacted]

Patrick, Diana

From: Tina Wilkinson <civicinput@newmode.io>
Sent: Friday, September 11, 2026 2:21 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Tina Wilkinson
[redacted]

Patrick, Diana

From: Susan Lamb <civicinput@newmode.io>
Sent: Friday, September 11, 2026 4:12 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. I have seen the effect on the marsh when long walkways and docks are allowed. The wrack accumlation is death to the nearby marsh.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Susan Lamb
[redacted]

Patrick, Diana

From: Teresa Ashman <civicinput@newmode.io>
Sent: Friday, September 11, 2026 4:15 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Teresa Ashman
[redacted]

Patrick, Diana

From: Jill Helton <civicinput@newmode.io>
Sent: Friday, September 11, 2026 4:19 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

Please help preserve and protect our marshes by making sound and responsible decisions. I want my children and grandchildren to be able to enjoy our coast as much as we do today.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jill Helton
[redacted]

Patrick, Diana

From: Mickey Youmans <civicinput@newmode.io>
Sent: Friday, September 11, 2026 5:56 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Mickey Youmans
[redacted]

Patrick, Diana

From: Nina Dutton <civicinput@newmode.io>
Sent: Friday, September 11, 2026 6:18 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross. The loss we all, as the public, will experience is not worth the extra luxury that a laughably small number of people would receive in the form of slightly more convenient water access.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Nina Dutton
[redacted]

Patrick, Diana

From: Jennifer Fletcher <civicinput@newmode.io>
Sent: Friday, September 11, 2026 11:07 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jennifer Fletcher
[redacted]

Patrick, Diana

From: Melanie Fenley <civicinput@newmode.io>
Sent: Saturday, September 12, 2026 6:55 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Melanie Fenley
[redacted]

Patrick, Diana

From: Keren Giovengo <civicinput@newmode.io>
Sent: Saturday, September 12, 2026 9:28 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

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Sincerely,
Keren Giovengo
[redacted]

Patrick, Diana

From: Elvira & Douglas Rivalsi <civicinput@newmode.io>
Sent: Saturday, September 12, 2026 10:42 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Elvira & Douglas Rivalsi
[redacted]

Patrick, Diana

From: David Hobbs <civicinput@newmode.io>
Sent: Saturday, September 12, 2026 1:05 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Sincerely,
David Hobbs
[redacted]

Patrick, Diana

From: Melanie Fenley <civicinput@newmode.io>
Sent: Saturday, September 12, 2026 2:39 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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Sincerely,
Melanie Fenley
[redacted]

Patrick, Diana

From: Nancy Webb <civicinput@newmode.io>
Sent: Saturday, September 12, 2026 9:05 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Nancy Webb
[redacted]

Patrick, Diana

From: Beth DiGiovanni <civicinput@newmode.io>
Sent: Saturday, September 12, 2026 10:48 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Beth DiGiovanni
[redacted]

Patrick, Diana

From: Ann Fuller <[redacted]>
Sent: Sunday, September 13, 2026 7:09 AM
To: Comments, CRD
Subject: Opposition to August draft rules - Use CMPC 1000' limit!

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.

Board of Natural Resources:

I urge the Board of Natural Resources to reject the August draft rules for private docks and ask Coastal Resources Division to revise the draft rules.

I urge you to bring the maximum dock walkway length into agreement with what the CMPC wisely limited many years ago for community and commercial docks. The CMPC did a great deal of work and consideration in landing on this 1000' maximum length.

To allow private docks to be longer is indefensible and leads the public to believe the monied interests and pressures are what drive the decisions of this Board and the GA Department of Natural Resources.

Furthermore the rules from August have tripled the previous and current square footage allowance of fixed walkways for private docks. This absurdly long walkway length, as well as the variance process should be scrapped in consideration of the Public Interest in our marshlands and the health of our environment.

I would like to state that I am.very much in favor of protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

Thank you for allowing the public to share our concerns.

Ann Fuller

Patrick, Diana

From: Norman Jacobs <civicinput@newmode.io>
Sent: Sunday, September 13, 2026 9:46 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

The draft rule for private docks is unacceptable and should be rejected and revised.

Tripling the square footage and extending the length of docks to 1,500 feet will adversely impact wildlife and marsh viability.

I refer you to published research, some by the scientists at the Skidaway Institute of Oceanography, that documents the risks and degradation of the marsh that these rules would lead to. We need to do better than this in Georgia to protect our coast, our environment and the wildlife that depend on these areas.

Therefore, I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

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Sincerely,
Norman Jacobs
[redacted]

Patrick, Diana

From: Gretchen Bowden <[redacted]>
Sent: Sunday, September 13, 2026 1:47 PM
To: Comments, CRD
Subject: Rule 391-2 Private 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.

Members of the Georgia Coastal Resource Division:

We do not understand why the desires of a few Georgia homeowners are being allowed to outweigh the negative environmental impact on taxpayer owned tidal water bottoms/marshland. We believe the Coastal Resources Division of the Georgia DNR should not allow this increase in dock length and width and should support a return to the previous 3,000 square foot maximum for dock-ways.

Sincerely,
Gretchen & Drew Bowden
[redacted]

Patrick, Diana

From: Amilda Cole <civicinput@newmode.io>
Sent: Sunday, September 13, 2026 3:16 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Amilda Cole
[redacted]

Patrick, Diana

From: Rachel Tandy <civicinput@newmode.io>
Sent: Sunday, September 13, 2026 6:16 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Rachel Tandy
[redacted]

Patrick, Diana

From: Cassandre Miller <[redacted]>
Sent: Monday, September 14, 2026 10:40 AM
To: Comments, CRD
Subject: Public comment: 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.

Coastal Resources Division,

My name is Cassandre Miller and I live at [redacted].

I recommend CRD do the following:
Return to the 3,000 square foot maximum for recreational dockway regulations.

The proposal of 9,000 square feet with unlimited variance is unnecessary—and detrimental. The maximum that has been put forward by the board is larger than any private dock regulation in the Southeast. Our neighbor South Carolina's limit is 1,000 square feet.

Has our vulnerable marshland and marine life given due consideration? Or at minimum, what about the navigability of our waters?

Just imaging the square footage imprint of the equivalent to a 6-8 bedroom home, or two Savannah squares, or 60 cars, or LONGER than the Savannah River Bridge, repeated however many times, just boggles common sense and ecological integrity.

Thank you,
Cassandre

Patrick, Diana

From: Jacquelyn Clark <civicinput@newmode.io>
Sent: Monday, September 14, 2026 2:31 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

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Sincerely,
Jacquelyn Clark
[redacted]

Patrick, Diana

From: Jacquelyn Clark <civicinput@newmode.io>
Sent: Monday, September 14, 2026 2:39 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely,
Jacquelyn Clark
[redacted]

Patrick, Diana

From: Kelly Brewer <civicinput@newmode.io>
Sent: Monday, September 14, 2026 10:13 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Kelly Brewer
[redacted]

Patrick, Diana

From: Joyce Murlless <civicinput@newmode.io>
Sent: Tuesday, September 15, 2026 1:12 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

Salt marsh is the major natural resource of Coastal Georgia. It is the basis for both recreation and seafood industries. And the marsh nourishes the fish that become the base for chicken feed, so salt marsh health extends to industries important to the whole state. The health of Georgia's salt marshes must be maintained!

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

As someone old enough to have worked in the 1960's to help pass our Marshland Protection Act, I continue to hope that Georgians will understand the importance, significance, and fragility of his engine

Sincerely,
Joyce Murlless
[redacted]

Patrick, Diana

From: KD West <kwest899@gmail.com>
Sent: Wednesday, September 16, 2026 9:10 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.

In response to Commissioner Poole's comments that the cost of building a long dock would impact people's decision on whether to build a dock, please consider that only a wealthy person would contemplate building a dock to accommodate their golf cart. Presumably so they wouldn't have to walk to get to their boat.

Please do not allow further damage to coastal resources to satisfy the rich.

Kathryn D West
[redacted]
SSI

Patrick, Diana

From: Katherine Warden <civicinput@newmode.io>
Sent: Wednesday, September 16, 2026 9:42 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am stunned at the actions of the CRD to expand the allowable dock footprints. There is nothing to support this measure and plenty of science and public sentiment against it. I hope that you will reconsider and temper this draft.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Katherine Warden
[redacted]

Patrick, Diana

From: Heather Werner <[redacted]>
Sent: Wednesday, September 16, 2026 4:37 PM
To: Comments, CRD
Subject: Dock Length

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.

Attn: Jill Andrews

This email is regarding the proposed dock length policy change. I do not support allowing docks to be up to 1,500 ft long and I hope that you do not either. This is opening up our fragile wetlands to too much habit destruction and human impact.

I sincerely hope you change your mind and go back to the old regulations.

I look forward to hearing from you.

Heather Werner

Patrick, Diana

From: [redacted]
Sent: Wednesday, September 16, 2026 6:16 PM
To: Comments, CRD
Subject: Regarding Wider/Longer 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.

Please accept this email as an OBJECTION to your proposal regarding longer & wider docks along the GA coast. You are the Department of Natural Resources. Have you no regard for our natural resources?

I was born, raised and still live in this great state. I own property in McIntosh County and am strongly opposed to these proposed regulations. Have you even thought about the ridiculousness of the dock size you are considering?

Listen to the citizens of this state. VOTE NO!

Sincerely
Lynn Copeland

Sent from my iPhone

Patrick, Diana

From: Eleanor Rhangos <civicinput@newmode.io>
Sent: Wednesday, September 16, 2026 8:09 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Eleanor Rhangos
[redacted]

Patrick, Diana

From: Jordan Henderson <[redacted]>
Sent: Wednesday, September 16, 2026 8:54 PM
To: Comments, CRD
Subject: No private docs

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.

No private docs on Cumberland Island! Leave the island alone. Jordan Henderson resident of coastal ga.

Patrick, Diana

From: Heather Werner <civicinput@newmode.io>
Sent: Wednesday, September 16, 2026 9:18 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Heather Werner
[redacted]

Patrick, Diana

From: Anne Quaile <civicinput@newmode.io>
Sent: Wednesday, September 16, 2026 11:27 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Anne Quaile
[redacted]

Patrick, Diana

From: Amanda Thompson <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 1:36 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Amanda Thompson
[redacted]

Patrick, Diana

From: Jill Morehouse Lum <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 2:43 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

Please hear our plea. We are counting on you. I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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I appreciate you!

Sincerely,
Jill Morehouse Lum
[redacted]

Patrick, Diana

From: Ann Marie Ellis <[redacted]>
Sent: Thursday, September 17, 2026 6:38 AM
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.

Patrick, Diana

From: Ann Marie Ellis <[redacted]>
Sent: Thursday, September 17, 2026 6:41 AM
To: Comments, CRD
Subject: Public Lands-Cumberland Island

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.

The purpose of this email is to vehemently oppose the development of Cumberland Island and the sale of our Public Lands. The natural beauty of this Island must be preserved for future generations to enjoy.

Ann Marie Ellis

Patrick, Diana

From: Bobmixson <[redacted]>
Sent: Thursday, September 17, 2026 7:24 AM
To: Comments, CRD
Subject: Dock size increase

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 morning,

I oppose increasing dock size!
I request DNR keep current dock size limits.
Marshlands are natural resources. They are fish and bird homes.
Marsh protect against hurricane flooding.

Sincerely,
Robert Mixson

Patrick, Diana

From: Cliff Courtenay <[redacted]>
Sent: Thursday, September 17, 2026 8:38 AM
To: Comments, CRD
Subject: Cumberland Island

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.

This rare island resource should not be butchered. Leave Cumberland Island alone.

Cliff Courtenay
Coast of Georgia

Patrick, Diana

From: Amy Callaway <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:58 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Amy Callaway
[redacted]

Patrick, Diana

From: Mary Pat Kelley <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:52 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

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Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Mary Pat Kelley
[redacted]

Patrick, Diana

From: Charlie <[redacted]>
Sent: Thursday, September 17, 2026 12:56 PM
To: Comments, CRD
Subject: 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.

Please do NOT increase allowances for length or width or height of docks in Georgia. This is an environmental, aesthetic, safety and public use issue.

Furthermore, we need to cut down on the number of docks being permitted to begin with, and we need stricter enforcement for the rules we already have.

I understand the appeal of a dock, but it is in the public good to further restrict them, NOT be more lenient.

Sincerely,
Charles Muise

Patrick, Diana

From: Molly Keyes <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:02 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

Sincerely,
Molly Keyes
[redacted]

Patrick, Diana

From: Daniel Hutto <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:05 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

We chased Sheffield island development out of town. Keep trying.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Daniel Hutto
[redacted]

Patrick, Diana

From: LaVaughn Smith <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:07 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
LaVaughn Smith
[redacted]

Patrick, Diana

From: Lindsey Marcec <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:09 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Lindsey Marcec
[redacted]

Patrick, Diana

From: Marc Hanson <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:09 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Marc Hanson
[redacted]

Patrick, Diana

From: Christina Williams <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:09 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Christina Williams
[redacted]

Patrick, Diana

From: Hilary Wilson <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:09 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Hilary Wilson
[redacted]

Patrick, Diana

From: Jamie Shultz <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:12 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jamie Shultz
[redacted]

Patrick, Diana

From: Robert Meyers <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:12 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I implore the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Robert Meyers
[redacted]

Patrick, Diana

From: Deb Luginbuhl <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:15 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Please consider the impact this will have on future generations. If the proposed change is made now and future changes are made as well, our salt marsh will bear the brunt of the human decisions.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Deb Luginbuhl
[redacted]

Patrick, Diana

From: Anna Rincon <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:17 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Anna Rincon
[redacted]

Patrick, Diana

From: Susan Khan <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:20 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Large docks will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few!

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Susan Khan
[redacted]

Patrick, Diana

From: Antonia Martin <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:22 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

Cumberland is a beautiful place and the land and marsh are habitats that need preserving. Please do not allow these docks and do a land swap.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,

Antonia Martin

Patrick, Diana

From: Norris Wootton <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:22 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

The current draft rule for private docks will be very harmful to the coastal environment. Please do NOT alow this draft to become law.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for “minor maintenance” and “major maintenance.” Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Norris Wootton
[redacted]

Patrick, Diana

From: Susan Emery <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:22 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Thank you for your consideration.

Sincerely,
Susan Emery
[redacted]

Patrick, Diana

From: Margaret Sapp <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:23 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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I am writing to urge the Board of Natural Resources to reject the current draft rules for private docks and ask the Coastal Resources Division to revise the proposed regulations.

The rules presented to the DNR Board in August would triple the current square-footage allowance for fixed walkways associated with private docks. Allowing private docks up to 1,500 feet in length to be constructed by-right, while also providing a variance process, could make extensive private access to public waters available primarily to those with the financial resources to construct and maintain such structures, regardless of the amount of public marshland they must cross.

Clear and well-defined regulations should be implemented to protect Georgia's marshes as well as the people and wildlife who depend on these natural resources. Specifically, I respectfully request the following changes to the proposed rules:

- Section 391-2-1-.04(2): Limit the maximum length of a fixed walkway to 1,000 feet or 4,000 square feet total.
- Section 391-2-1-.02(13)(a & b): Add specific definitions for "minor maintenance" and "major maintenance" so that these terms can be applied consistently.
- Section 391-2-1-.02(16 & 21): Clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap between the two terms.

New regulations governing activities in Georgia's public marshlands should protect public resources and wildlife while being grounded in sound research and data. I respectfully ask the Board of Natural Resources and CRD to revisit the proposed rules for private recreational docks and maintain reasonable limits that honor Georgia's longstanding responsibility to protect our shared public resources.

Thank you for your consideration.

Sincerely,

Margaret Sapp

[redacted]

Watkinsville, GA

Patrick, Diana

From: Joe Costyn <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:23 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

Please! No long docks on the marsh. Why do rich people have no sense of place??? Leave the natural beauty alone!

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Joe Costyn
[redacted]

Patrick, Diana

From: Brendon Parks <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:27 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

To Whom It May Concern,
I am writing to express my strong opposition to the proposed land swaps and any future private development on Cumberland Island National Seashore. This remarkable barrier island is one of the largest and wildest left on the Atlantic coast, and it must be left exactly as it is.
Allowing the construction of massive private estates and exclusive beach infrastructure directly undermines the purpose of our National Park system and the explicit intent of Congress to protect this area as a primitive wilderness. Cumberland Island provides an increasingly rare, untouched sanctuary for vital wildlife habitat. Its ancient live oak maritime forests, fragile saltwater marshes, and pristine shores serve as critical nesting beaches for endangered loggerhead sea turtles and countless shorebirds.
Industrializing or developing even a portion of this public treasure for private benefit risks a permanent downward spiral for the ecosystem. Once this pristine coastal habitat is fragmented by large estates, roads, and private facilities, the destruction to wildlife and natural landscapes cannot be undone.
Public lands belong in public hands. I urge you to reject these land exchanges, prioritize science-driven conservation, and keep Cumberland Island wild, undeveloped, and protected for generations to come.
Sincerely
Brendon Parks
[redacted]
Clermont Ga[redacted]

Patrick, Diana

From: Dayana Avila <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:27 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

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Sincerely,
Dayana Avila
[redacted]

Patrick, Diana

From: Robert Gantt <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:27 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Robert Gantt
[redacted]

Patrick, Diana

From: Delina Malinoff <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:29 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Delina Malinoff
[redacted]

Patrick, Diana

From: Elizabeth Sutton <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:29 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Elizabeth Sutton
[redacted]

Patrick, Diana

From: Adina Hilton <civicinput@newmode.io>

Sent: Thursday, September 17, 2026 4:39 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules.

The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Thank you,
Adina Hilton
[redacted]

Patrick, Diana

From: Amy Moran <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:43 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Amy Moran
[redacted]

Patrick, Diana

From: Kevin Lang <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:43 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Kevin Lang
[redacted]

Patrick, Diana

From: Kellan Monroe <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:51 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data, not on the whims of the wealthiest people who use the water. Recreation must be balanced with respect for the land itself so that future generations may enjoy it.

I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,

Kellan Monroe

Patrick, Diana

From: Walter & Kimberly Lee <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:51 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Many, many of us love our coast for what it is and has been. The integrity of the environment, and it's enjoyment and appreciation, requires firm guardrails in the face of a growing population which comes with increased desires for personal utilization. Our coast simply cannot be all things to all people. I hope that you will pursue the rule-making process from the standpoint of preservation for all rather than appeasement of a relative few.

Sincerely,
Walter & Kimberly Lee
[redacted]

Patrick, Diana

From: Robert Delano <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:54 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Robert Delano
[redacted]

Patrick, Diana

From: Bryan Roux <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:54 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Bryan Roux
[redacted]

Patrick, Diana

From: Douglas Kallman <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:55 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Douglas Kallman
[redacted]

Patrick, Diana

From: William Kehoe <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 4:56 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
William Kehoe
[redacted]

Patrick, Diana

From: Barbara Else <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 5:04 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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.

Sept. 17, 2026

Attn: Ms. Andrews,

I am writing to strongly urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board dramatically increase the current square footage allowance of fixed walkways for private docks. Very large docks harm marsh habitat and erode a vital ecosytem and national treasure. The proposed rules also contribute to reduced public access to this shared and treasured resource held in trust by DNR for the public —not a few.

I respectfully request clearer regulations with strong management practices to protect our marsh and continue to encourage public access. I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Barbara A Else, MPA
[redacted]

Patrick, Diana

From: Michael Cook <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 5:09 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource. Please reconsider this destructive idea that only benefits the rich.

Sincerely,
Michael Cook
[redacted]

Patrick, Diana

From: Pablo Mancheno <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 5:13 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,

Pablo Mancheno



Patrick, Diana

From: Nancy Jenkins <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 5:21 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 agree with all below- we must preserve our wildlife and ocean critters.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Nancy Jenkins
[redacted]

Patrick, Diana

From: Raleigh Koritz <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 5:24 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask the Coastal Resources Division to revise the draft rule. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring proof of electrical permitting.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Raleigh Koritz
[redacted]

Patrick, Diana

From: Elaine Sears <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 5:29 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Elaine Sears
[redacted]

Patrick, Diana

From: Patrick Maurice <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 5:30 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Patrick Maurice
[redacted]

Patrick, Diana

From: Matt Herrman <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 5:45 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

The docks are too damn long already!

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Matt Herrman
[redacted]

Patrick, Diana

From: Lewis Lay <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:01 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely

Lewis Lay

[redacted]

Patrick, Diana

From: Mike Peale <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:04 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Mike Peale
[redacted]

Patrick, Diana

From: Tracy Cramer <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:06 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Tracy Cramer
[redacted]

Patrick, Diana

From: Maggie Wharton <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:13 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Maggie Wharton
[redacted]

Patrick, Diana

From: Lawrence Kloet <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:15 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Lawrence Kloet
[redacted]

Patrick, Diana

From: Donald Privett <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:16 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Donald Privett
[redacted]

Patrick, Diana

From: Dr. Bonnie Springer <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:24 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask the Coastal Resources Division to revisit the draft rules. New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request that the Board of Natural Resources and CRD reject the current draft rules and then revisit the draft rule for private, recreational docks. Please uphold reasonable regulations that honor the legacy of protecting this shared and precious public resource.

One key consideration is that our marshes and wetlands - these unique and essential natural resources are shared - not reserved for the wealthiest citizens, but are available to everyone. This is a central way the Board of Natural Resources and the CRD protect the dream of democracy - that all are equally valued in our dear country. Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

However, the rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply with standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by

1) limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). I

2) adding specific definitions for "minor maintenance" and "major maintenance in Section 391-2-1-.02(13)(a&b),

3) Clarifying the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

I look forward to hearing news of your plans to revisit the draft proposal with the eyes of stewardship. equity and justice - for all of the inhabitants of our precious Georgia coast, - human, plant, and animal.

Sincerely,
Dr. Bonnie Springer

[redacted]

Patrick, Diana

From: Christa Hayes <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:35 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 urge the Board of Natural Resources to keep in mind that Georgia's salt marsh system is facing multiple manmade stressors to the ecological systems supporting those marshes from large scale deforestation and water issues caused by construction of huge transportation related complexes and potential AI Data Centers. To allow for the combined effects of adding direct damage to salt marshes during initial construction phases, year after year, and then to be followed by long term disruption of that ecosystem's ability to sustain the salt marshes natural resources is irresponsible. It poses a burden too great to carry.

These saltmarshes absorb the worst of the hurricanes wrath, nourish our bodies with food and our souls with beauty. Who could possibly support the meager benefits to be enjoyed by developers compared to the loss of the Saltmarsh Wren sining at high tide, the calls of Clapper Rails at the turn of tides, or the gleaming arc of a dolphins back at sunrise? Please embrace the well presented points below made by One Hundred Miles.

...reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Christa Hayes
[redacted]

Patrick, Diana

From: Jamie Klem <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:49 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Jamie Klem

[redacted]

Patrick, Diana

From: Cheryl H Helton <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 6:56 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely,
Cheryl H Helton
[redacted]

Patrick, Diana

From: Melanie Furr <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 7:11 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

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Sincerely,
Melanie Furr
[redacted]

Patrick, Diana

From: Christina Cotter <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 7:36 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Christina Cotter
[redacted]

Patrick, Diana

From: Rena Patton <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:08 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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,

Because I live on the beautiful Georgia coast, I have a very special urgency in doing my part to protect the marshes and the tidal creeks that distinguish our native ecosystem. That is why I am urging you to stop the expansion of dock sizes here. Please, do your part, too.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Sincerely,
Rena Patton
[redacted]

Patrick, Diana

From: Derin Parker <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:09 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely,
Derin Parker
[redacted]

Patrick, Diana

From: Sheryl Roberts <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:20 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely,
Sheryl Roberts
[redacted]

Patrick, Diana

From: Maggie Miller <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:20 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Maggie Miller

Patrick, Diana

From: Mary Mowry <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:26 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

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Sincerely,
Mary Mowry
[redacted]

Patrick, Diana

From: Peter Brodhead <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:30 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Peter H Brodhead [redacted]

Patrick, Diana

From: Ruth McMullin <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:39 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

My husband and I have been residents of Chatham County since 1997. I have volunteered for all those years at the UGA aquarium, where I can help residents and children learn about our precious marshes. There is no need to change the current restrictions on docks, and I hartily hope that they will not be changed.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

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Sincerely,
Ruth McMullin
[redacted]

Patrick, Diana

From: Kyle Gray <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:41 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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this is important.

Sincerely,
Kyle Gray
[redacted]

Patrick, Diana

From: Daniel SCHLAGMAN <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:43 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Daniel SCHLAGMAN
[redacted]

Patrick, Diana

From: Ric Felker <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 8:46 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely,
Ric Felker
[redacted]

Patrick, Diana

From: Amy Edgy <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 9:09 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Amy Edgy
[redacted]

Patrick, Diana

From: Christa Kerby <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 9:33 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

5 football fields???

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Sincerely,
Christa Kerby
[redacted]

Patrick, Diana

From: Kathy Hodges <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 9:46 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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As boaters we are dismayed to see longer and longer docks being built through the marshes. Among other things old marsh grass gets clogged which threatens to suffocate the marsh

Sincerely,
Kathy Hodges
[redacted]

Patrick, Diana

From: M Rebecca Carr <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 9:51 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
M Rebecca Carr
[redacted]

Patrick, Diana

From: Pamela Brown <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 9:54 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely

Pamela Brown

[redacted]

Patrick, Diana

From: Kathleen Wolfe <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 9:54 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Kathleen Wolfe
[redacted]

Patrick, Diana

From: Julie Sutton <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:07 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Julie Sutton
[redacted]

Patrick, Diana

From: Leuveda Garner <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:11 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Leuveda Garner
[redacted]

Patrick, Diana

From: Terri Keller <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:24 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Terri Keller
[redacted]

Patrick, Diana

From: Miranda O'shields <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:26 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely,
Miranda O'shields
[redacted]

Patrick, Diana

From: Michelle Jamison <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:30 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Michelle Jamison
[redacted]

Patrick, Diana

From: Mary Morrison <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:35 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks. I am NOT in favor of increasing dock size to benefit select people. The marshes here are beautiful. I bike or walk almost everyday and I usually do so where I can see the marsh. Please do not harm something that is so special to me.

Sincerely,

Mary Morrison

[redacted]

Patrick, Diana

From: Michael Fleetwood <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:47 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Michael Fleetwood
[redacted]

Patrick, Diana

From: jaime Campora <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 10:59 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
jaime Campora
[redacted]

Patrick, Diana

From: joyce cotter <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 11:01 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
joyce cotter
[redacted]

Patrick, Diana

From: Val Farrelly <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 11:10 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Val Farrelly
[redacted]

Patrick, Diana

From: Lacey Irizarry <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 11:15 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Lacey Irizarry
[redacted]

Patrick, Diana

From: Peter Followill <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 11:18 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

As a regular visitor to Georgia's coast, I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. Georgia's salt marshes provide critical habitat to birds and other wildlife, but the current draft rule will do irreparable harm to this important ecosystem.

The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Peter Followill
[redacted]

Patrick, Diana

From: Michelle Henry <civicinput@newmode.io>
Sent: Thursday, September 17, 2026 11:27 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Michelle Henry
[redacted]

Patrick, Diana

From: Eric Bumgartner <civicinput@newmode.io>
Sent: Friday, September 18, 2026 12:47 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Eric Bumgartner
[redacted]

Patrick, Diana

From: Heidi Germano <civicinput@newmode.io>
Sent: Friday, September 18, 2026 2:22 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Heidi Germano
[redacted]

Patrick, Diana

From: Alexandra McNeal <civicinput@newmode.io>
Sent: Friday, September 18, 2026 7:25 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Alexandra McNeal
[redacted]

Patrick, Diana

From: Connie Boole <civicinput@newmode.io>
Sent: Friday, September 18, 2026 7:48 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,

Connie Boole

[redacted]

Savannah, GA

Patrick, Diana

From: Holly Roy <civicinput@newmode.io>
Sent: Friday, September 18, 2026 8:16 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely.

Holly Roy

[redacted]

Patrick, Diana

From: sarah schenkman <civicinput@newmode.io>
Sent: Friday, September 18, 2026 8:46 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
sarah schenkman
[redacted]

Patrick, Diana

From: Robert Szychowski <civicinput@newmode.io>
Sent: Friday, September 18, 2026 8:52 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Robert Szychowski
[redacted]

Patrick, Diana

From: E Hodges <civicinput@newmode.io>
Sent: Friday, September 18, 2026 8:55 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely,
E Hodges
[redacted]

Patrick, Diana

From: MaryBeth Deiters <civicinput@newmode.io>
Sent: Friday, September 18, 2026 9:36 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules as introduced would triple the square footage allowance of fixed walkways for private docks - and allow for exceptions. Docks this large will compromise public access and harm marsh habitat. A thriving marsh ecosystem is one of the jewels of Georgia.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

Sincerely,
MaryBeth Deiters
[redacted]

Patrick, Diana

From: MaryBeth Deiters <civicinput@newmode.io>
Sent: Friday, September 18, 2026 9:42 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules as introduced would triple the square footage allowance of fixed walkways for private docks - and allow for exceptions. Docks this large will compromise public access and harm marsh habitat. A thriving marsh ecosystem is one of the jewels of Georgia.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

Sincerely,
MaryBeth Deiters
[redacted]

Patrick, Diana

From: MaryBeth Deiters <civicinput@newmode.io>
Sent: Friday, September 18, 2026 10:01 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules as introduced would triple the square footage allowance of fixed walkways for private docks - and allow for exceptions. Docks this large will compromise public access and harm marsh habitat. A thriving marsh ecosystem is one of the jewels of Georgia.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

Sincerely,
MaryBeth Deiters
[redacted]

Patrick, Diana

From: MaryBeth Deiters <civicinput@newmode.io>
Sent: Friday, September 18, 2026 10:19 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules as introduced would triple the square footage allowance of fixed walkways for private docks - and allow for exceptions. Docks this large will compromise public access and harm marsh habitat. A thriving marsh ecosystem is one of the jewels of Georgia.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

Sincerely,
MaryBeth Deiters
[redacted]

Patrick, Diana

From: Rebecca Rolfes <civicinput@newmode.io>
Sent: Friday, September 18, 2026 10:36 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Rebecca Rolfes
[redacted]

Patrick, Diana

From: Amilda Cole <civicinput@newmode.io>
Sent: Friday, September 18, 2026 10:44 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Amilda Cole
[redacted]

Patrick, Diana

From: Dottie Leatherwood <civicinput@newmode.io>
Sent: Friday, September 18, 2026 10:49 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Dottie Leatherwood
[redacted]

Patrick, Diana

From: Richard Peters <civicinput@newmode.io>
Sent: Friday, September 18, 2026 11:00 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need very clear regulations and very strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Richard Peters
[redacted]

Patrick, Diana

From: KATHRYN PROPST <civicinput@newmode.io>
Sent: Friday, September 18, 2026 11:42 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

Although I am currently a resident of Indiana, I am a former (and hopefully returning) resident of coastal Georgia; my husband still lives there. Therefore, we are greatly impacted by this issue. **I am writing to strongly urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules.** The rules introduced to the DNR Board in August triple the current square footage allowance of fixed walkways for private docks. Why?! Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
KATHRYN PROPST
[redacted]

Patrick, Diana

From: Janet Kaylo <civicinput@newmode.io>
Sent: Friday, September 18, 2026 1:06 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing concerned about the current draft rule for private docks. It is incomprehensible that the new proposed rules triple square footage allowances for walkways and docks! What happened? The previous regulations have been in place for a very long time and we need to continue to protect our marshes - not change rules so that they suffer more damage. The variance process is also problematic - it opens up abuse by those who can afford whatever they want, making access something 'for sale', which is well outside of how the DNR is meant to work. DNR isn't supposed to protect the wealthy so they can do whatever they like, it's meant to protect the environment, which does not have a price tag on it.

Furthermore, the wording is unclear about just what 'maintenance' is, major or minor, and, again, money talks and if you have the money you can of course say the dock needs maintenance, if that maintenance is about making the dock wider and longer to maintain your luxury access. Modification and reconstruction likewise are unclear and again just leave dollars in the place of marsh protection.

We must continue to protect wildlife and the marshes that sustain them.

Please uphold reasonable regulations on docks that impact the life of our ecosystem.

Patrick, Diana

From: Helen Haynes <civicinput@newmode.io>
Sent: Friday, September 18, 2026 1:17 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

Please protect our marsh habitat and all the marine life that depends upon it! I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Helen K. Haynes
[redacted]

Patrick, Diana

From: Kris Bisgard <[redacted]>
Sent: Friday, September 18, 2026 1:36 PM
To: Comments, CRD
Subject: Long docks over the Georgia coast marsh should not be allowed

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.

We need to keep the coast wild and protected. Please do not allow docks longer than 30 feet extend over the marsh. Thank you for protecting the Georgia Coast.
Kris Bisgard
[redacted]

Patrick, Diana

From: Tonnia Switzer <civicinput@newmode.io>
Sent: Friday, September 18, 2026 1:52 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask the Coastal Resources Division to revise the draft rules. As someone who lives on the coast in South Carolina but works on the Coast of Georgia, I know the rules introduced to the DNR Board in August **triple** the current square-footage allowance for fixed walkways on private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, benefits only the wealthiest Georgians, who can buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply with standards that protect our marshes and natural resource users. Specifically, please revise the proposed draft rules to limit the maximum walkway length to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring proof of electrical permitting.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Tonnia Switzer
[redacted]

Patrick, Diana

From: Tina Ridley <civicinput@newmode.io>
Sent: Friday, September 18, 2026 3:34 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat.

Leaders set aside so much of our money for "tourism", esp here in Darien, where we are getting a 2nd Chamber of Commerce visitors center & our town doesn't even have one single traffic light. Yet, some of these same are allowing so much unplanned development (most with tax credits), the reasons some of us moved here & why we do have so much tourism is being destroyed. I wish someone could explain it to me. With McIntosh Commissioner Davis Poole wanting unlimited dock lengths, he should be recusing himself as a CMPA decision maker as well.

Please share my comments with the Board. Thank you for your consideration.

As a reminder...

CRD's Mission:

> To balance coastal development and protection of the coast's natural assets, socio-cultural heritage and recreational resources for the benefit of present and future generations.

CRD's Vision:

> To be an agency of knowledgeable and compassionate professionals who are trusted, respected and empowered to help the public be stewards of Georgia's natural assets and socio-cultural heritage.

CRD's Goals:

- Effective constituent interaction
- Enhanced science-based decision making
- Organizational synergy

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

Sincerely,
Tina Ridley
[redacted]

Patrick, Diana

From: Whitney Edenfield <civicinput@newmode.io>
Sent: Friday, September 18, 2026 3:54 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Whitney Edenfield
[redacted]

Patrick, Diana

From: Joan Shinnick <civicinput@newmode.io>
Sent: Friday, September 18, 2026 5:28 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

Please reject the draft rule for private docks, so that the precious marshland is protected and not turned in to private property.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Joan Shinnick
[redacted]

Patrick, Diana

From: Bradley Wilkinson <civicinput@newmode.io>
Sent: Friday, September 18, 2026 5:53 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Bradley Wilkinson
[redacted]

Patrick, Diana

From: Terry Kelly <civicinput@newmode.io>
Sent: Friday, September 18, 2026 6:38 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am fortunate to live on Skidaway Island The irony of living on a barrier island and writing this letter does not escape me However, our development has covenants preventing docks except for the two docks at marinas This restriction has served us well We enjoy unrestricted vistas of the marsh We do not adversely impact the multiple creatures growing in this "nursery." I urge you to follow the wishes of conservationists and do not allow bigger private docks I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Terry Kelly
[redacted]

Patrick, Diana

From: Carol Wingo <[redacted]>
Sent: Friday, September 18, 2026 8:02 PM
To: Comments, CRD
Subject: Private docks on Cumberland Island

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.

Having lived near Cumberland Island for 27 years, NO TO PRIVATE DOCKS THAT ARE LONGER THSN THOSE CURRENTLY IN USE.

Carol Wingo
Former Brunswick, GA resident

Patrick, Diana

From: Paula Harwell <civicinput@newmode.io>
Sent: Friday, September 18, 2026 8:55 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Paula Harwell
[redacted]

Patrick, Diana

From: James LaPean Sr. <civicinput@newmode.io>
Sent: Friday, September 18, 2026 9:43 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
James LaPean, Sr.
[redacted]

Patrick, Diana

From: Joy Hamby <civicinput@newmode.io>
Sent: Friday, September 18, 2026 9:47 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Joy Hamby
[redacted]

Patrick, Diana

From: Jennifer Taylor <civicinput@newmode.io>
Sent: Friday, September 18, 2026 10:57 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Sincerely,
Jennifer Taylor
[redacted]

Patrick, Diana

From: Jerry Banks <civicinput@newmode.io>
Sent: Saturday, September 19, 2026 4:25 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jerry Banks
[redacted]

Patrick, Diana

From: María Dabrowski <civicinput@newmode.io>
Sent: Saturday, September 19, 2026 8:55 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
María Dabrowski
[redacted]

Patrick, Diana

From: Debra Power <civicinput@newmode.io>
Sent: Saturday, September 19, 2026 9:36 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am extremely disappointed in the constant reduction of environmental protections in Georgia, and am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Debra Power
[redacted]

Patrick, Diana

From: Andrew Thompson <civicinput@newmode.io>
Sent: Saturday, September 19, 2026 10:50 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 someone who cherishes our coastal marsh, I feel I MUST speak up for the many who will be negatively impacted by a proposed rule.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Andrew Thompson
[redacted]

Patrick, Diana

From: Rebecca Lang <civicinput@newmode.io>
Sent: Saturday, September 19, 2026 1:05 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Rebecca Lang
[redacted]

Patrick, Diana

From: Mark <[redacted]>
Sent: Saturday, September 19, 2026 3:24 PM
To: Comments, CRD
Subject: CMPA proposed changes 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 Madam/ Sir,
I have thoroughly read and understood the proposed rules changes regarding construction, monitoring, permitting, and maintenance of properties in the jurisdictions of the CMPA.

The number of permitted docks in Chatham County is extensive and requires a tremendous amount of staff and dedication. I personally commend you on your efforts.

There are a large number of docks that were permitted 75-80 years ago when the installation of a gravel or other allowed fill for a walkway/ causeway was allowed. There is nothing noted in the proposed guidelines for owners of these structures and permitted maintenance thereof.

Many of these structures adhere to the CMPA guidelines of Mean Water Level (MWL) 5.6 and are delineated from the tidal water bottoms of the State. However, no information regarding maintenance is included in the proposal. Also, there are Act Of God / Hurricane and tropical storms exemptions which allow immediate repairs by puridian owners.

The inclusion of this information should be considered as comments are being solicited. Thank you for your assistance.

Patrick, Diana

From: Suzan Satterfield <[redacted]>
Sent: Saturday, September 19, 2026 3:40 PM
To: Comments, CRD
Subject: Proposed Cumberland Island Dock Building

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 strongly oppose the proposed regulation change that would allow the construction of private recreational docks, larger than any other in the Southeast, to be built on Cumberland Island. Fifteen thousand feet long and six feet wide is a ridiculous, ostentatious size for a private dock and should never be allowed across our publicly-owned marshlands. It's thanks to Jimmy Carter's historic protection, along with other wise politicians and organizations that our Georgia coast has been kept safe from the devastating effects of overbuilding into sensitive environments. Our historic appreciation of the natural beauty and the importance of our marshlands have protected us from the kind of damage that's been down up and down Florida's once-beautiful and functional coast.

Why on earth would any private land owner need a dock longer than the Savannah River Bridge? One can only suspect that more development and a boat marina would follow. No! Georgia's natural coast needs to be respected and protected, especially during these times of increased flooding and other climate-caused degradation. I can only hope that the outcry will be overwhelming enough to stop the folks who want to take advantage of the NPS' casual attitude toward permanent damage of public lands for the sake of a few wealthy folks, (who may very well be donors to the politicians pushing for this travesty).

Sincerely,

A Committed Coast-Loving Georgian,

[redacted]

Patrick, Diana

From: connie Darbyshire <[redacted]>
Sent: Saturday, September 19, 2026 4:19 PM
To: Comments, CRD
Subject: proposed change in dock building 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.

Dear GA Department of Natural Resources Board and Coastal Resources Division:

I am a resident of coastal Georgia and lived [redacted] in Chatham County for 30 years. We had a private dock, as did most of our neighbors. We all appreciate the need for clear and consistent rules for private docks..

I am deeply worried about your proposed new rules that would allow private dock walkways to be as much as six feet wide and 1,500 feet long. That is just too much dock!

Our GA marsh should be protected and nourished. It is very important to our ecosystem. I strongly believe that someone who has marshfront property should not have the expectation of getting deep water by building a dock that hurts the existing marsh.

I am all for deep water access, but it should be restricted to the existing proscriptions on dock building. Anything else opens up a can of worms that will be very hard to change at a later date.

Georgia's salt marsh is one of our state's greatest natural assets. It protects our communities, supports wildlife and fisheries, and is central to the character and economy of our coast. Once these public marshlands are fragmented or impaired, the consequences can extend well beyond an individual property. Please do the right thing for future generations.

I urge the DNR to adopt clear, science-based standards that provide reasonable private water access while keeping protection of Georgia's publicly owned marshes and tidal waterways at the center of these regulations.

Thank you for your consideration and for your stewardship of Georgia's coastal resources. You are critical to the protection of our awesome natural resources.

Sincerely,

Connie Darbyshire

[redacted]

Patrick, Diana

From: Elizabeth Dupree <civicinput@newmode.io>
Sent: Saturday, September 19, 2026 5:18 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Elizabeth Dupree
[redacted]

Patrick, Diana

From: Andrea Chappelle <civicinput@newmode.io>
Sent: Saturday, September 19, 2026 7:35 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. I ask that the CRD to change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science, considering impacts to habitat and viewing points of natural environments.

New rules regulating activities in public marshlands must protect the public and wildlife. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Andrea Chappelle
[redacted]

Patrick, Diana

From: Donna Davis-Speakes <civicinput@newmode.io>
Sent: Sunday, September 20, 2026 8:39 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Donna Davis-Speakes
[redacted]

Patrick, Diana

From: John Schacke <civicinput@newmode.io>
Sent: Sunday, September 20, 2026 9:02 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
John Schacke
[redacted]

Patrick, Diana

From: Catherine Bradshaw <civicinput@newmode.io>
Sent: Sunday, September 20, 2026 9:15 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

PLEASE reject the draft rule for private docks on Cumberland Island.

Docks will harm marsh habitat. They will also compromise public access to this shared resource held in trust by DNR *for the public*.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. I ask that the CRD to limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands

Thank you for including protective measures.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Catherine Bradshaw

[redacted]

Patrick, Diana

From: William Corson <civicinput@newmode.io>
Sent: Sunday, September 20, 2026 11:22 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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Sincerely,
William D. Corson
[redacted]

Patrick, Diana

From: Dava OConnor <civicinput@newmode.io>
Sent: Sunday, September 20, 2026 12:50 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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Sincerely,
Dava OConnor
[redacted]

Patrick, Diana

From: Jack Brodhag <civicinput@newmode.io>
Sent: Sunday, September 20, 2026 2:25 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jack Brodhag
[redacted]

Patrick, Diana

From: Elvira & Douglas Rivalsi <civicinput@newmode.io>
Sent: Sunday, September 20, 2026 3:57 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource..... NO more loss of salt water marshes!!!!!!!!!!!!!!!!!!!!!!!!!!!

Sincerely,
Elvira & Douglas Rivalsi
[redacted]

Patrick, Diana

From: Suzanne Thomas <civicinput@newmode.io>
Sent: Monday, September 21, 2026 9:18 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to **reject** the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

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Sincerely,
Suzanne Thomas
[redacted]

Patrick, Diana

From: Vanessa Jozwiak <civicinput@newmode.io>
Sent: Monday, September 21, 2026 10:18 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Vanessa Jozwiak
[redacted]

Patrick, Diana

From: Lauren Brooks <civicinput@newmode.io>
Sent: Monday, September 21, 2026 11:07 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Lauren Brooks
[redacted]

Patrick, Diana

From: Jonathan Weller <civicinput@newmode.io>
Sent: Monday, September 21, 2026 12:09 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Jonathan Weller
[redacted]

Patrick, Diana

From: Fred Winckler <civicinput@newmode.io>
Sent: Monday, September 21, 2026 12:27 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Fred Winckler
[redacted]

Patrick, Diana

From: Jeffry White <civicinput@newmode.io>
Sent: Monday, September 21, 2026 12:51 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jeffry White
[redacted]

Patrick, Diana

From: Mary Herrington <civicinput@newmode.io>
Sent: Monday, September 21, 2026 4:40 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Mary Herrington
[redacted]

Patrick, Diana

From: Sallie Cooper <civicinput@newmode.io>
Sent: Monday, September 21, 2026 7:42 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing today to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. These rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. These larger docks will shade extensively, cause wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public. The marsh should be enjoyed by all, but be protected and safeguarded. Restraint is paramount.*

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

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Thank you for your time,

Sallie Cooper

[redacted]

Fortson Georgia

Patrick, Diana

From: Rachel Francois <civicinput@newmode.io>
Sent: Monday, September 21, 2026 8:54 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

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Sincerely,
Rachel Francois
[redacted]

Patrick, Diana

From: Beverly Miller <civicinput@newmode.io>
Sent: Tuesday, September 22, 2026 2:05 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Beverly Miller
[redacted]

Patrick, Diana

From: Virginia Zart <civicinput@newmode.io>
Sent: Tuesday, September 22, 2026 2:47 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Virginia Zart
[redacted]

Patrick, Diana

From: Rebecca Rowell <[redacted]>
Sent: Tuesday, September 22, 2026 3:10 PM
To: GDA.Communications@agr.georgia.gov; info@shrimpalliance.com; Anneallen.westbrook@house.ga.gov; James McKinzie; Comments, CRD; Carter.Casework@mail.house.gov
Subject: Re: Georgia Fuel cost for Shrimpers

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.

September 22, 2026

The Honorable Governor of Georgia
Office of the Governor
State of Georgia

Dear Governor Kemp, Georgia Senator, Buddy Carter, Ms. Westbrook, DNR, CDR,

I am writing to you as a member of Georgia's commercial shrimping community to ask for help with an issue that is putting one of our state's oldest working traditions in danger: the cost of diesel fuel.

Georgia's shrimping industry is already struggling to survive. Here in Savannah, we are down to only a small number of shrimp boats that are still actively working—roughly 12 to 18 boats. Every year it becomes harder for these family-owned operations to keep going.

Diesel is not optional for us. It is what gets our boats offshore, keeps our engines and equipment running, and allows us to bring fresh, wild-caught Georgia shrimp back to the dock. When diesel prices rise, the cost of making a single trip can become so high that a shrimper has to question whether it is financially possible to leave the dock at all.

When a shrimp boat stays tied to the dock because it cannot afford fuel, the effects go far beyond that one boat.

It affects the captains and deckhands who depend on shrimping for their income. It affects seafood markets, restaurants, docks, processors, suppliers, mechanics, and other local businesses. Most importantly, it affects whether Georgia families and visitors can continue putting fresh, locally caught Georgia shrimp on their tables.

We are competing in a market where consumers can buy imported shrimp at prices that local fishermen often cannot compete with. Georgia shrimpers have to pay for fuel, maintenance, insurance, equipment, nets, repairs, labor, permits, and all the other expenses required to safely operate a commercial vessel. Diesel prices add another major burden to an industry that is already fighting to stay alive.

Once these boats are gone, they will not be easy to replace. Neither will the generations of knowledge and experience that go with them.

Georgia should not have to depend entirely on imported seafood when we have hardworking fishermen right here on our own coast who are willing to do the work and provide fresh, wild-caught Georgia shrimp.

I respectfully ask your administration and state leaders to look at ways Georgia can provide meaningful fuel relief or other assistance to our remaining commercial shrimp boats. Whether through a diesel tax exemption or rebate, a commercial fishing fuel assistance program, grants, or another form of targeted relief, we need help that directly reduces the cost of getting our boats out on the water.

This is about more than diesel.

It is about keeping Georgia shrimpers working. It is about protecting coastal jobs and family businesses. It is about preserving a way of life that has been part of Georgia's coast for generations. And it is about making sure fresh, wild-caught Georgia shrimp can continue going from our boats to Georgia tables.

Please do not wait until the last shrimp boat leaves the dock to recognize what Georgia has lost.

I ask you to meet with and listen to the commercial shrimpers who are still working out of Savannah and along the Georgia coast. We can tell you firsthand what it costs to operate these boats and what assistance would make a real difference.

We want to work. We want to keep our boats running. We want to keep providing fresh Georgia shrimp to our communities. We are simply asking the State of Georgia to help give this dying industry a fighting chance.

Thank you for your time and consideration.

Respectfully,

Rebecca Rowell
Shrimpn' & Shenanigans LLC
Shrimp Boat Georgia Grace
Savannah, Georgia

912-704-7638

KEEP GEORGIA SHRIMPING. KEEP GEORGIA SHRIMP LOCAL.

On Tue, Sep 22, 2026 at 3:06 PM Rebecca Rowell <shrimplife83@gmail.com> wrote:

September 22, 2026

The Honorable Governor of Georgia
Office of the Governor
State of Georgia

Dear Governor Kemp, Senator Buddy Carter, Ms. Westbrook, DNR, CDR,

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Georgia's shrimping industry is already struggling to survive. Here in Savannah, we are down to only a small number of shrimp boats that are still actively working—roughly 12 to 18 boats. Every year it becomes harder for these family-owned operations to keep going.

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Respectfully,

Rebecca Rowell
Shrimpn' & Shenanigans LLC
Shrimp Boat Georgia Grace
Savannah, Georgia

912-704-7638

KEEP GEORGIA SHRIMPING. KEEP GEORGIA SHRIMP LOCAL.

Patrick, Diana

From: Janet Mitchell <[redacted]>
Sent: Tuesday, September 22, 2026 3:29 PM
To: Comments, CRD
Subject: Public and Private Dock Inspections

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 provide a comment in regards to the current attempt to gather public opinion on dock regulations. I firmly believe that every dock should be inspected annually to determine if the electrical wiring is safe. Many lives have been lost due to electrocution caused by faulty electrical wiring. I am aware of the Anthony Kale Stephens electrocution here in Glynn County. Even though it is a problem in our entire Country, we can't let it happen in our County again. Please consider this request to require mandatory annual dock inspections at the expense of the owners. No one would want to have an electrocution happen on their property if it can be prevented.

Best Regards,
Janet Mitchell
[redacted]
Sent from my iPhone

Patrick, Diana

From: Lauren Cook <[redacted]>
Sent: Wednesday, September 23, 2026 8:52 AM
To: Comments, CRD
Subject: Rules for private 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.

I recommend CRD do the following to strengthen the draft rule: Return to the 3,000 square foot maximum for the dockway employed during the previous regulatory process.

Patrick, Diana

From: Carol Yager <civicinput@newmode.io>
Sent: Wednesday, September 23, 2026 9:38 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 visit this beautiful area and hope the salt marshes that make it so special will be protected. I urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Carol Yager
[redacted]

Patrick, Diana

From: Mallorie Davis <civicinput@newmode.io>
Sent: Wednesday, September 23, 2026 10:10 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Mallorie Davis
[redacted]

Patrick, Diana

From: Ramsey Nix <[redacted]>
Sent: Wednesday, September 23, 2026 1:03 PM
To: Comments, CRD
Subject: Opposition to Proposed Rule 391-2-1 Allowing Excessive Private 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 Coastal Resources Division and Members of the Board of Natural Resources:

I am writing to **strongly oppose** the proposed revisions to the private dock rules. This proposal would allow walkways up to 1,500 feet long and 6 feet wide—9,000 total square feet, triple the current limit—with a variance process permitting docks an additional 10% larger. This change directly contradicts the intent of Georgia's Marshland Protection Act of 1970, which was designed to protect tidal marshes as a public trust resource.

First, this proposal blatantly ignores prior public input. During stakeholder committee meetings and public town halls convened earlier this year, community members and conservation organizations explicitly called for stronger, more protective rules, pointing to scientific evidence showing cumulative habitat impacts and impacts on marsh-dependent birds, and recommended **against expanding allowable dock sizes** or creating a variance process. Yet the current draft does the opposite—escalating the walkway area limit from 3,000 square feet to 6,600 square feet (and even more with variances). This is a disregard for the public's voice.

Second, excessively long docks will cause irreversible fragmentation of our marshes. A 1,500-foot private walkway means a single dock could cross **nearly one-third of a mile of public marsh**. Scientific evidence demonstrates that even large-scale docks cause shading of marsh grass, habitat fragmentation, and wrack accumulation. CRD's own commissioned studies have confirmed that shading negatively impacts marsh grass growth. When DNR admits it can "barely quantify" the actual impacts of docks, doubling or tripling the size limit is an irresponsible regulatory rollback.

Third, private structures of this scale amount to privatization of public views and resources. Georgia's tidal marshes belong to **all citizens**, not just waterfront property owners. Private docks stretching thousands of feet across public waters severely compromise the public's right to enjoy natural marsh views. Furthermore, the variance process allowing an additional 10% expansion opens the door to even more extreme encroachment.

I respectfully urge CRD and the Board of Natural Resources to:

1. **Withdraw** the current proposal allowing 1,500-foot-long, 6-foot-wide walkways.
2. **Maintain or tighten** existing total area limits (e.g., 3,000 square feet) to minimize any single dock's footprint on public marsh.

3. **Eliminate** the variance provision that permits an additional 10% beyond already-relaxed standards.
4. **Honor** the spirit of the 1970 Marshland Protection Act by treating tidal marshes as a public trust resource to be protected for present and future generations.

Georgia's marsh coastline is an irreplaceable natural heritage. Please do not sacrifice the ecological integrity that belongs to all of us for the private convenience of a few.

Sincerely,

Ramsey Nix

Patrick, Diana

From: Cindy Stevens <[redacted]>
Sent: Wednesday, September 23, 2026 1:19 PM
To: Comments, CRD
Cc: Mark Stevens
Subject: Private Coastal 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.

Good afternoon,
We are writing to comment as Georgia coastal residents on Tybee Island to urge and request the state of Georgia and DNR not to allow the size of private docks to increase in dock sizes, and also not to allow any docks of any size to be constructed with no permitting or work done by a licensed contractor.

We have boated and observed the docks already built in our waters and seen how shoddy many of them are constructed, how many of them are not maintained, and how many of them cover marsh blocking the sun and changing the ecology for plants, crabs, wading birds, and more.

We are also volunteers with Clean Coast out of Savannah and have seen firsthand how much debris from docks washes up on the barrier islands, hammocks, and sand banks of coastal Georgia. These include planks, styrofoam, plastic, lightbulbs and recreational items people store on these docks. They do not decompose, are usually large in size and broken, and are hard to carry and remove by boat.

When we kayak up coastal estuaries and creeks, we already have to struggle through rows of varied length docks, again of varied construction and deterioration, especially in waters that become narrower and shallower with the tide. If a kayak has trouble, I'd expect motorboats to struggle as well.

And for those of us who still swim in our coastal waters, the docks make it difficult to swim and be seen by boaters.

Thank you for listening and hope you decide to maintain current dock sizes or even decrease them, insist on permits that check for safe and stable construction, and insist on professionals to do any engineering and electrical work.

Sincerely,
Cindy and Mark Stevens

Patrick, Diana

From: Helen Rogers <[redacted]>
Sent: Wednesday, September 23, 2026 2:05 PM
To: Comments, CRD
Subject: Comments on proposed 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.

Dear Department of Natural Resources:

I am deeply disturbed to hear that these new rules are being proposed that will erode protections for the state of Georgia' coastal marshlands. These rules seem to greatly increase the length and marsh coverage for docks and boardwalks and substantially diverge from prior guidance on marsh protection and public access. Furthermore, these new proposed rules are not based on any discernible scientific foundation, unlike in the prior rule making where the DNR did its own scientific research. As a Georgia Taxpayer, I am alarmed that my marshlands are being giving away to private individuals for their personal use. I am further concerned that this is happening without any scientific study of what the impact on the flora and fauna will be or the long term erosion this could cause.

I think these next paragraphs from the GA Conservancy (underlined) also express my concerns:

Now that we stand on the precipice of another housing boom, these Rules would significantly weaken private recreational dock regulations, allowing dock boardwalks of up to 1,500 feet (1,650 with a 10% variance). This is more than 50% longer than currently allowed by GA DNR policy, and, with no limit on square footage, would allow docks to directly cover 9,900 sq feet or 0.2 acres of coastal marshlands for private development. *This amount of marsh coverage substantially exceeds the definition of a minor impact* (0.1 acres or 4,356 sq ft) in the Coastal Marshland Protection Act and would be allowed without any requirements for property owners to mitigate the negative impacts on public resources. Furthermore, this significant increase in direct marsh shading impacts doesn't even consider the additional impacts to the habitat in the buffer areas surrounding the dock, which studies have shown are also degraded by dock construction.

While we understand the need for a limited 10% variance process that considers hardship cases, the process as proposed has no standards by which the variance should be judged or an objective and science-based process to consider how variances would be granted. The proposed process is highly subjective and could place an undue burden on DNR staff, potentially subjecting the agency to lawsuits if variance requests are rejected. We suggest that these Rules be updated to provide more clarity on what situation qualifies for a variance, and under what conditions a variance should be granted.

The Board should also consider that current policy allows private property owners to receive a revocable license from the State to impact public resources for free. There is no acknowledgment of the cost

to taxpayers for the permitting services provided by GA DNR staff, nor of the impacts on public resources for which the citizens of Georgia are not currently compensated. It costs more to get a license to fish in Georgia than it does to get a license to build a dock over coastal marshlands. This lack of revenue limits the ability of GA DNR staff to administer this program including review, inspections, and enforcement. The lack of resources also affects waiting times for revocable license applicants, making them unnecessarily long.

Georgia Conservancy is also concerned that significant changes are being made despite the fact that there is no complete inventory of existing docks either at the State or Federal level. Furthermore, these rules do not appear to be based on any scientific report that has been accepted and made public by GA DNR, nor were these rules based on any clear legal premise for private water access beyond State-owned marsh. Without knowledge of what currently exists, and what the impacts of additional docks will be, how can the Board reasonably be expected to make a judgement about dock regulations and how changes to that framework will impact the resources it is charged with protecting?

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. GA DNR has long worked to provide access to these resources held in public trust for all of us by the State of Georgia. However, 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. If the Board adopts regulations that apply statewide to satisfy the request of a few individual marsh front property owners, then what stops the next request for a significant alteration to GA DNR policy that benefits only a few individuals?

We Must Protect What We Love: Our marshes are vast, healthy, and beautiful because of the adoption of the Coastal Marshlands Protection Act in 1970, not because they were left to chance. GA DNR has been a dedicated steward of our coastal marshlands since that time, and we ask that the Board remain vigilant in its protection of our public marshes now and in the future. 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.

Again, as a taxpayer and citizen of Georgia, I am greatly disturbed by these actions by the DNR, whose primary purpose should be to preserve and protect these marshlands for all of Georgia and not to give them away to a few individuals.

Sincerely,

Helen Rogers

Patrick, Diana

From: Brooke Michael <brooke.michael@birdsgeorgia.org>
Sent: Wednesday, September 23, 2026 2:14 PM
To: Comments, CRD
Cc: Adam Betuel
Subject: Notice of Proposed Rules for Private Docks in State Owned Tidal Waters Comment
Attachments: Birds Georgia_Dock Rules 2026 Updated Comment 91726.docx.pdf

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Hello,

On behalf of Birds Georgia, I'd like to formally submit our comment on the proposed rules for private docks in state owned tidal waters. The letter is attached here as a PDF, and pasted below.

We appreciate the opportunity to comment on these proposed rules.

Thank you,
Brooke Michael

--
Brooke Michael | Director of Communications and Outreach

Birds Georgia
825 Warner Street, SW, Ste. B, Atlanta, GA 30310
678-973-2437 | brooke.michael@birdsgeorgia.org
Pronouns: *She, her, hers*
Birds Georgia is building places where birds and people thrive. Help us by becoming a member.

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

Subject: Notice of Proposed Rules for Private Docks in State Owned Tidal Waters Comment

Dear Ms. Andrews:

Thank you for the opportunity to comment on the Proposed Rules for Private Docks in State Owned Tidal Waters issued by the Georgia Department of Natural Resources Coastal Resources Division (CRD) on August 26, 2026.

Birds Georgia's mission is to build places where birds and people thrive. We fulfill this mission through conservation, education, and outreach. With more than 2,500 members across the state, Birds Georgia

represents a broad constituency united by a desire to protect birds, other wildlife, and the places they need to survive. Our constituents include coastal residents, frequent visitors, and people throughout Georgia who recognize the ecological, recreational, and cultural importance of our coastal marshlands.

Birds Georgia opposes the proposed rules in their current form and urges the CRD and Board of Natural Resources to revise them before adoption. We also support the recommendations presented by One Hundred Miles and submit these additional comments to emphasize the potential effects on birds and their habitats.

Georgia's tidal marshes are among the state's most productive and fragile ecosystems. The extensive stands of smooth cordgrass (*Spartina alterniflora*) that characterize these marshes help maintain their physical structure and support the food webs and natural cycles on which coastal wildlife depends. These coastal wildlife species include marsh-nesting specialists, wading birds, shorebirds, raptors, and gulls who rely on tidal marshes for essential nesting, foraging, and roosting habitat.

Private docks alter these ecosystems by shading marsh vegetation, physically disturbing habitat, creating new edges, and fragmenting otherwise continuous marsh. As a result, the ecological footprint of a dock can be substantially greater than the area physically occupied by the structure.

The proposed rules would allow a fixed walkway to measure up to 1,500 feet long and six feet wide, creating a potential walkway footprint of 9,000 square feet. Section 391-2-1-.07 would allow the walkway to extend an additional 150 feet through a variance. These dimensions greatly exceed the previous 3,000-square-foot walkway standard and the one-tenth-acre benchmark associated with minor alterations under the Coastal Marshlands Protection Act. They also exceed South Carolina's standards, which limit private dock walkways to 1,000 feet in length and four feet in width.

To protect Georgia's marshes while preserving responsible access to public tidal waters, Birds Georgia requests that CRD make the following changes:

-
-
- Limit single family dock walkway
- length to 1,000 linear feet or 3,000 square feet. 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.
-

These changes are supported by the following ecological concerns for many different groups of birds including marsh-nesting specialists, wading birds, shorebirds, raptors, and gulls.

Habitat Loss and Degradation

Spartina alterniflora provides shelter for many breeding birds as well as seasonal migrants and visitors. Research along the Atlantic coast, including here in Georgia, consistently shows that fixed dock structures reduce light to the marsh vegetation and substantially change the integrity of the marsh (Logan et al., 2018; Alexander and Robinson, 2004; Sanger et al., 2004).

Shadows cast by docks can reduce sunlight in these important habitats, causing a reduction of up to 56% in marsh grass stem density (Alexander and Robinson, 2004, 2006). The reduction of such grasses can mean a decline in available breeding habitat for marsh-nesting specialists including Worthington's, Marsh Wrens,

Seaside Sparrows, King Rails, and Clapper Rails, all of which rely on continuity of dense marsh vegetation to hide their nests from predators.

Research on these tidal marsh birds consistently identifies habitat loss as one of the major threats to population declines. The change in grass density because of shading also has dire consequences on the food resources that these birds require. The shading actively lowers overall marsh productivity, changes carbon availability, and alters nutrient cycling, which ultimately leads to diminished shellfish and marine fish nurseries, essential prey for wading birds such as the aforementioned rail species along with other wading birds and shorebirds (Pasco and Baltz, 2011; Valiela, Rutecki, and Fox, 2004).

This includes marsh foraging birds listed as "Highest Conservation Concern" on the State Wildlife Action Plan such as Whimbrel, Saltmarsh Sparrow, and MacGillivray's Seaside Sparrow (Schneider and Keyes, 2025).

Predation Concerns

Predation is the primary cause of nest failure for many coastal marsh bird species and lengthening docks would increase the amount of edge habitat, potentially increasing nest predation. Recent research in coastal Georgia supported this and found that Seaside Sparrow nests have increased predator activity near edges and narrow landscape features, such as docks (Newsome and Hunter, 2022).

Additionally, docks provide perches for avian predators such as gulls and raptors. The presence of such predators can directly influence where marsh birds choose to nest and therefore reduce suitable breeding area and local bird populations (Wallander et al. 2006). Extending docks into marsh habitat can indirectly increase predation on marsh birds.

Conclusion

The scientific evidence shows that docks can shade and reduce marsh vegetation, fragment habitat, alter food webs, affect predator activity, and diminish the overall ecological health of tidal marshes. These impacts increase with the length, width, density, and cumulative footprint of dock structures.

Georgia's coastal marshes are a defining natural resource and provide essential habitat for birds of significant conservation concern. Clear regulations and strong management practices are necessary to protect these marshes while allowing responsible access to public tidal waters.

Birds Georgia respectfully asks the Board of Natural Resources not to adopt the proposed rules as currently written. At a minimum, CRD should:

-
-
- Limit single family dock walkway
- length to 1,000 linear feet or 3,000 square feet, whichever limit is reached first;
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-
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- Establish clear, science-based
- eligibility requirements and review criteria for variances;
-
-
-
- Prevent the expansion of existing,
- serviceable docks merely to take advantage of larger standards;
-

- Require consideration of cumulative
- habitat impacts; and
- Maintain strong construction,
- inspection, maintenance, and debris-removal requirements.

These protections are necessary to preserve the ecological integrity of Georgia's coastal marshlands for birds, other wildlife, and current and future generations of Georgians.

Thank you for considering our comments.

Sincerely,

Executive Director
Birds Georgia

Literature Cited:

Alexander, C. R., & Robinson, M. H. (2004). GIS and field-based analysis of the impacts of recreational docks on the saltmarshes of Georgia [Final report]. Georgia Coastal Zone Management Program, Georgia Department of Natural Resources, Coastal Resources Division.

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BIRDS GEORGIA

825 Warner St. SW, Ste. B, Atlanta, GA 30310
www.BirdsGeorgia.org
678-973-2437

Submitted electronically on September 24 to crd.comments@dnr.ga.gov

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

Subject: Notice of Proposed Rules for Private Docks in State Owned Tidal Waters Comment

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They also exceed South Carolina's standards, which limit private dock walkways to 1,000 feet in length and four feet in width.

To protect Georgia's marshes while preserving responsible access to public tidal waters, Birds Georgia requests that CRD make the following changes:

- Limit single family dock walkway length to 1,000 linear feet or 3,000 square feet. 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.

These changes are supported by the following ecological concerns for many different groups of birds including marsh-nesting specialists, wading birds, shorebirds, raptors, and gulls.

Habitat Loss and Degradation

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Shadows cast by docks can reduce sunlight in these important habitats, causing a reduction of up to 56% in marsh grass stem density (Alexander and Robinson, 2004, 2006). The reduction of such grasses can mean a decline in available breeding habitat for marsh-nesting specialists including Worthington's, Marsh Wrens, Seaside Sparrows, King Rails, and Clapper Rails, all of which rely on continuity of dense marsh vegetation to hide their nests from predators.

Research on these tidal marsh birds consistently identifies habitat loss as one of the major threats to population declines. The change in grass density because of shading also has dire consequences on the food resources that these birds require. The shading actively lowers overall marsh productivity, changes carbon availability, and alters nutrient cycling, which ultimately leads to diminished shellfish and marine fish nurseries, essential prey for wading birds such as the aforementioned rail species along with other wading birds and shorebirds (Pasco and Baltz, 2011; Valiela, Rutecki, and Fox, 2004).

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Additionally, docks provide perches for avian predators such as gulls and raptors. The presence of such predators can directly influence where marsh birds choose to nest and therefore reduce suitable breeding area and local bird populations (Wallander et al. 2006). Extending docks into marsh habitat can indirectly increase predation on marsh birds.

Conclusion

The scientific evidence shows that docks can shade and reduce marsh vegetation, fragment habitat, alter food webs, affect predator activity, and diminish the overall ecological health of tidal marshes. These impacts increase with the length, width, density, and cumulative footprint of dock structures.

Georgia's coastal marshes are a defining natural resource and provide essential habitat for birds of significant conservation concern. Clear regulations and strong management practices are necessary to protect these marshes while allowing responsible access to public tidal waters.

Birds Georgia respectfully asks the Board of Natural Resources not to adopt the proposed rules as currently written. At a minimum, CRD should:

- Limit single family dock walkway length to 1,000 linear feet or 3,000 square feet, whichever limit is reached first;
- Establish clear, science-based eligibility requirements and review criteria for variances;
- Prevent the expansion of existing, serviceable docks merely to take advantage of larger standards;
- Require consideration of cumulative habitat impacts; and
- Maintain strong construction, inspection, maintenance, and debris-removal requirements.

These protections are necessary to preserve the ecological integrity of Georgia's coastal marshlands for birds, other wildlife, and current and future generations of Georgians.

Thank you for considering our comments.

Sincerely,



Executive Director
Birds Georgia

Literature Cited:

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Patrick, Diana

From: John Brandon <civicinput@newmode.io>
Sent: Wednesday, September 23, 2026 4:10 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
John Brandon
[redacted]

Patrick, Diana

From: Amanda Deitsch <civicinput@newmode.io>
Sent: Wednesday, September 23, 2026 4:47 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Amanda Deitsch
[redacted]

Patrick, Diana

From: Andrews, Jill
Sent: Wednesday, September 23, 2026 5:09 PM
To: Haymans, Doug; Fisher, Taylor
Cc: Comments, CRD
Subject: RE: Dock Fatality

We have. It's been logged but I haven't reviewed the comments yet.
I'll also send this to the CRD Comments email in case there's something new for the comment record. I will also preparing a response as part of the board package going up.
Thanks!

From: Haymans, Doug <Doug.Haymans@dnr.ga.gov>
Sent: Wednesday, September 23, 2026 1:39 PM
To: Fisher, Taylor <Taylor.Fisher@dnr.ga.gov>; Andrews, Jill <Jill.Andrews@dnr.ga.gov>
Subject: Re: Dock Fatality

Will do. Thank you.

From: Fisher, Taylor <Taylor.Fisher@dnr.ga.gov>
Sent: Wednesday, September 23, 2026 1:23 PM
To: Haymans, Doug <Doug.Haymans@dnr.ga.gov>; Andrews, Jill <Jill.Andrews@dnr.ga.gov>
Subject: Fw: Dock Fatality

Good afternoon!

Have you received public comment from Ms. Stephens and if not, can this please be included.

Thank you!
Taylor

From: Sheila Stephens <[redacted]>
Sent: Monday, September 21, 2026 1:55 PM
To: Fisher, Taylor <Taylor.Fisher@dnr.ga.gov>
Subject: FW: Dock Fatality

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Good Afternoon,

I am trying to send this message to board members for the DNR. Can you please help me?

Thank you

From: Sheila Stephens
Sent: Wednesday, September 9, 2026 3:01 PM
To: boclark@glynncounty-ga.gov; stostensen@glynncounty-ga.gov; wneal@glynncounty-ga.gov; bduncan@glynncounty-ga.gov; dsweat@glynncounty-ga.gov; abooker@glynncounty-ga.gov; wrafolski@glynncounty-ga.gov
Subject: Dock Fatality

To whom it may concern, this is Kale Stephens---He tragically lost his life on June 12, 2023 due to a hazardous dock. Please continue reading his story:



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
[redacted]

Patrick, Diana

From: Courtney Reich <creich@georgiaconservancy.org>
Sent: Wednesday, September 23, 2026 5:43 PM
To: Comments, CRD; Andrews, Jill
Cc: Katherine Moore
Subject: GA Conservancy Comments on DNR Rules for private docks located over state-owned tidal water bottoms
Attachments: CRD PRD Rule 092126.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, please find Georgia Conservancy's official comments on 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, dated August 26, 2026.

Georgia Conservancy continues to be troubled by the erosion of protections for our coastal marshlands in this updated version of the Rules. These Rules, as proposed, significantly increase the allowable length and marsh coverage for dock boardwalks, diverging from DNR's previous focus on marsh protection and public access. We ask that the DNR 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. Thank you for the opportunity to provide comments and for considering our input on this matter.

Sincerely,
Courtney

Georgia CONSERVANCY

Courtney Reich
Coastal Director
Georgia's land. Georgia's future. Since 1967.

georgiaconservancy.org
creich@georgiaconservancy.org
912-656-1316

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*Executive Committee Member

Georgia CONSERVANCY

September 23, 2026

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

RE: Proposed amendments to Section 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, dated August 26, 2026

Dear Ms. Andrews:

On behalf of the Georgia Conservancy, we are submitting the following comments on the proposed Rules for Private Recreational Docks (Rules), issued by the Georgia Department of Natural Resources (DNR) Coastal Resources Division (CRD) on August 26, 2026. We appreciate the opportunity to provide comments and recognize the challenge that DNR faces regarding the development and adoption of the Rules. Furthermore, Georgia Conservancy continues to support DNR's efforts to adopt Rules to regulate private recreational docks constructed over public trust tidal waters to ensure safety and consistency for the public and to protect our coastal marshlands.

We are truly appreciative of the Board of Natural Resources' decision on August 25, 2026, to prohibit spanning creeks wider than 20 ft, and limiting variances in deck length to 10%. This is a dramatic improvement that will prevent significant impacts to our coastal marshlands. However, Georgia Conservancy continues to be troubled by the erosion of protections for our coastal marshlands in this updated version of the Rules. Considering the numerous questions asked by Board Members at the August 25th meeting regarding the impacts of what they were being asked to adopt, we are offering the comments below in an effort to be clear regarding our concerns.

These Rules, as proposed, significantly increase the allowable length and marsh coverage for dock boardwalks, diverging from DNR's previous focus on marsh protection and public access. Based on the numerous comments received by the GA DNR during the last public comment period supporting protections for our marshlands, and the lack of scientific foundation upon which this version of the Rules is based, we find it difficult to understand why the Board of Natural Resources would consider approving the Rules as written.

The current framework for dock regulations came through GA DNR's own robust stakeholder process in the late 2000s that was initiated because of the concerning proliferation of docks during the housing boom. At that time, GA DNR commissioned its own scientific research and convened stakeholders to develop a regulatory framework that was protective of the coastal marshlands, based on sound science, and consistent with neighboring states.

Georgia CONSERVANCY

Now that we stand on the precipice of another housing boom, these Rules would significantly weaken private recreational dock regulations, allowing dock boardwalks of up to 1,500 feet (1,650 with a 10% variance). This is more than 50% longer than currently allowed by GA DNR policy, and, with no limit on square footage, would allow docks to directly cover 9,900 sq feet or 0.2 acres of coastal marshlands for private development. *This amount of marsh coverage substantially exceeds the definition of a minor impact (0.1 acres or 4,356 sq ft) in the Coastal Marshlands Protection Act* and would be allowed without any requirements for property owners to mitigate the negative impacts on public resources. Furthermore, this significant increase in direct marsh shading impacts doesn't even consider the additional impacts to the habitat in the buffer areas surrounding the dock, which studies have shown are also degraded by dock construction.

While we understand the need for a limited 10% variance process that considers hardship cases, the process as proposed has no standards by which the variance should be judged or an objective and science-based process to consider how variances would be granted. The proposed process is highly subjective and could place an undue burden on DNR staff, potentially subjecting the agency to lawsuits if variance requests are rejected. We suggest that these Rules be updated to provide more clarity on what situation qualifies for a variance, and under what conditions a variance should be granted.

The Board should also consider that current policy allows private property owners to receive a revocable license from the State to impact public resources for free. There is no acknowledgement of the cost to taxpayers for the permitting services provided by GA DNR staff, nor of the impacts on public resources for which the citizens of Georgia are not currently compensated. It costs more to get a license to fish in Georgia than it does to get a license to build a dock over coastal marshlands. This lack of revenue limits the ability of GA DNR staff to administer this program including review, inspections, and enforcement. The lack of resources also affects waiting times for revocable license applicants, making them unnecessarily long.

Georgia Conservancy is also concerned that significant changes are being made despite the fact that there is no complete inventory of existing docks either at the State or Federal level. Furthermore, these rules do not appear to be based on any scientific report that has been accepted and made public by GA DNR, nor were these rules based on any clear legal premise for private water access beyond State-owned marsh. Without knowledge of what currently exists, and what the impacts of additional docks will be, how can the Board reasonably be expected to make a judgement about dock regulations and how changes to that framework will impact the resources it is charged with protecting?

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. GA DNR has long worked to provide access to these resources held in public trust for all of us by the State of Georgia. However, 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. If the Board adopts regulations that apply statewide to satisfy the request of a few

individual marsh front property owners, then what stops the next request for a significant alteration to GA DNR policy that benefits only a few individuals?

We Must Protect What We Love: Our marshes are vast, healthy, and beautiful because of the adoption of the Coastal Marshlands Protection Act in 1970, not because they were left to chance. GA DNR has been a dedicated steward of our coastal marshlands since that time, and we ask that the Board remain vigilant in its protection of our public marshes now and in the future. If we relax the standards now, we risk undermining the very thing that makes our coast so special.

We ask that the DNR 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 the GA DNR-CRD to seek input on this important topic, allow Georgia Conservancy to participate in the Private Recreational Dock Stakeholder Committee, and consider our comments and concerns on the proposed Rules.

Sincerely,

Courtney Reich
Coastal Director

Katherine Moore
President

Georgia CONSERVANCY

Patrick, Diana

From: Lara Sims <civicinput@newmode.io>
Sent: Thursday, September 24, 2026 8:23 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Lara Sims
[redacted]

Patrick, Diana

From: Elise Drake <civicinput@newmode.io>
Sent: Thursday, September 24, 2026 9:16 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Elise Drake
[redacted]

Patrick, Diana

From: Beth Kempe <civicinput@newmode.io>
Sent: Thursday, September 24, 2026 10:17 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Beth Kempe
[redacted]

Patrick, Diana

From: John Grainger <civicinput@newmode.io>
Sent: Thursday, September 24, 2026 10:55 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I recently attended a community meeting in Brunswick that included a briefing by Alice Keyes concerning the proposed rule changes to private docks. PLEASE REJECT THE DRAFT RULE concerning a substantial increase to private dock area and/or length in coastal Georgia. Persons who purchase "marsh-front" properties should not be allowed to overide existing dock restrictions becuase they decide they want (and can afford) "water-front" (dockable) properties. The argument recalls the stories of folks who move near an airport only to complain about the noise. The further encroachment into our marshes is NOT in the interest of most Georgians, and is *seemingly* to accomodate a select few. The CRD was chartered to PROTECT the coastal environment, and not to bow to self-centered, well-financed development interests.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
John Grainger

[redacted]

Patrick, Diana

From: Patty Ragland <civicinput@newmode.io>
Sent: Thursday, September 24, 2026 2:26 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Patty Ragland
[redacted]

Patrick, Diana

From: Lynda Beam <civicinput@newmode.io>
Sent: Thursday, September 24, 2026 3:05 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Lynda Beam
[redacted]

Patrick, Diana

From: John Robinson <civicinput@newmode.io>
Sent: Thursday, September 24, 2026 4:36 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

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Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
John Robinson
[redacted]

Patrick, Diana

From: sally coenen <[redacted]>
Sent: Thursday, September 24, 2026 7:15 PM
To: Comments, CRD
Subject: long 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.

Please protect our marshes for all the public to enjoy, as Georgia's Marshland Protection Act of 1970 intended.

Long docks, especially those impacting more than 1/10 of an acre of marsh, will lead to more fragmented habitat, shaded marsh, and wrack accumulation.

Long private docks that could cross nearly ⅓ mile of public marshes affect marsh views and increase the likelihood of damage and debris from storms.

I urge you to deny this request.

Thank you,
Sally Coenen
[redacted]

Patrick, Diana

From: Roxann Drew <civicinput@newmode.io>
Sent: Friday, September 25, 2026 6:25 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few. As a local resident in Townsend, I cherish my marsh view as well as my private dock AND I know the direct impacts that expanding these rules will have on this rich ecosystem. The current regulations are more than fair with their allowance of private dock size.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Roxann Drew
[redacted]

Patrick, Diana

From: Kathleen Wannemuehler <civicinput@newmode.io>
Sent: Friday, September 25, 2026 6:52 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I ask the Board to reconsider. The Board should focus on protecting our shared resources and public lands, not allow a few wealthy landowners to damage & destroy. Consider future generations not just short term gains for a few individuals.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Kathleen Wannemuehler
[redacted]

Patrick, Diana

From: Nichole Dandrea <civicinput@newmode.io>
Sent: Friday, September 25, 2026 6:54 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Nichole Dandrea
[redacted]

Patrick, Diana

From: Jennifer Weil <civicinput@newmode.io>
Sent: Friday, September 25, 2026 7:42 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jennifer Weil
[redacted]

Patrick, Diana

From: Elaine Johnson <civicinput@newmode.io>
Sent: Friday, September 25, 2026 8:19 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Elaine Johnson
[redacted]

Patrick, Diana

From: Meg Kettlitz <civicinput@newmode.io>
Sent: Friday, September 25, 2026 8:33 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Meg Kettlitz
[redacted]

Patrick, Diana

From: Emily Culling <civicinput@newmode.io>
Sent: Friday, September 25, 2026 10:05 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Emily Culling
[redacted]

Patrick, Diana

From: MARILYN ODELL <civicinput@newmode.io>
Sent: Friday, September 25, 2026 10:21 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

I and my family are often on the coast to enjoy the wildlife and various benefits of living in the beautiful state of GA that has such a valuable resource in its coastal and marsh properties. Please take care about how we manage these precious areas. I want my grandchildren to have the benefit of being Georgians who love the coast as much as I do.

Sincerely,
MARILYN ODELL
[redacted]

Patrick, Diana

From: Summer Deason <civicinput@newmode.io>
Sent: Friday, September 25, 2026 10:34 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Summer Deason
[redacted]

Patrick, Diana

From: Michelle Moyer <civicinput@newmode.io>
Sent: Friday, September 25, 2026 10:47 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Sincerely,
Michelle Moyer
[redacted]

Patrick, Diana

From: Debra Combs <civicinput@newmode.io>

Sent: Friday, September 25, 2026 12:00 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Sincerely,
Debra Combs
[redacted]

Patrick, Diana

From: Kathryn Kyker <civicinput@newmode.io>
Sent: Friday, September 25, 2026 12:22 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I take pride in our state's historical protection of marshes. There is no justification for ending that protection now just when that delicate resource needs our continuing protection more than ever!

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

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Sincerely,
Kathryn Kyker

[redacted]

Patrick, Diana

From: Jacquelyn Lickness <civicinput@newmode.io>
Sent: Friday, September 25, 2026 12:52 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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I don't see a clear benefit to the state to do a change like this. Economically it'll have an insignificant impact but ecologically it will have an outsized one. George's Coast are one of the most beloved in the the country and we should keep it that way. I for one love visiting the coast. I originally hail from California and I do love the Pacific coastline, but moving to Georgia. I've come to appreciate the gorgeous marshland and how different it is from other coasts I've been to. It really is a point to boast about compared to other states and we should maintain that comparative advantage and not limit who or how we access it.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jacquelyn Lickness
[redacted]

Patrick, Diana

From: Debbie McKevitt <civicinput@newmode.io>
Sent: Friday, September 25, 2026 12:54 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Sincerely,
Debbie McKevitt
[redacted]

Patrick, Diana

From: Cydney Wells <civicinput@newmode.io>
Sent: Friday, September 25, 2026 1:54 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

As a shareholder in a neighboring coastal island, I have seen the damage that these oversized projects wreak on sensitive marshlands. The objective must be minimal obstruction to the resource (wetland), not to contort it for personal convenience.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Cydney Wells
[redacted]

Patrick, Diana

From: Winkler Weinberg <civicinput@newmode.io>
Sent: Friday, September 25, 2026 3:36 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Winkler Weinberg
[redacted]

Patrick, Diana

From: Esther Stokes <civicinput@newmode.io>
Sent: Friday, September 25, 2026 5:47 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I live in Atlanta, and one might think Atlantans aren't too concerned about the coast. That would be wrong! We LOVE going to the Georgia coast, exploring the Georgia marshes, enjoying nature in all its glory. I am writing today to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few. These marshes are special, and Atlantans and indeed all Georgians treasure them. Covering the marsh with docks that can be 1,000 feet long is a stunning downer.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Esther Stokes
[redacted]

Patrick, Diana

From: Kendall Crosby <civicinput@newmode.io>
Sent: Friday, September 25, 2026 6:00 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Kendall Crosby
[redacted]

Patrick, Diana

From: Dawn Able <civicinput@newmode.io>
Sent: Friday, September 25, 2026 8:16 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. We need new rules regulating activities in public marshlands which protect the public **AND** wildlife and be based on research and data, and not be placed to benefit the wealthy. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by by prohibiting the free flow of tidal waters, and encourage shading, wrack accumulation, and fragmentation, which threatens the welfare of manatees and other marsh-dwelling creatures.. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Dawn Able
[redacted]

Patrick, Diana

From: Jamie Klem <civicinput@newmode.io>
Sent: Saturday, September 26, 2026 8:05 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jamie Klem
[redacted]

Patrick, Diana

From: Nancy Grove <civicinput@newmode.io>
Sent: Saturday, September 26, 2026 3:10 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

I am a tax paying, voting Georgia fulltime resident and am proud of Georgia's unique coast much of which is natural. Please consider the risk to this beautiful coast before allowing more human intrusuon.

Sincerely,
Nancy Grove
[redacted]

Patrick, Diana

From: Jonathan Mittleider <civicinput@newmode.io>
Sent: Saturday, September 26, 2026 3:54 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Thank you,
Jonathan Mittleider
[redacted]

Patrick, Diana

From: Laura Mora <civicinput@newmode.io>
Sent: Saturday, September 26, 2026 6:10 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Laura Mora
[redacted]

Patrick, Diana

From: Beth Reed <[redacted]>
Sent: Saturday, September 26, 2026 6:41 PM
To: Comments, CRD
Subject: Proposed Dock Rules change

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 morning,
My name is Elizabeth Reed and I live on Tybee Island. I am vehemently opposed to changing the Dock Rules. The current guidelines are adequate and I do not believe the interests of a few should dictate new regulations. Please do not make these changes.
Sincerely,
Elizabeth Reed

Patrick, Diana

From: Teresa Mayes <civicinput@newmode.io>
Sent: Sunday, September 27, 2026 10:37 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Teresa Mayes
[redacted]

Patrick, Diana

From: Cynthia Patterson <[redacted]>
Sent: Sunday, September 27, 2026 12:50 PM
To: Comments, CRD
Subject: protect Georgia's salt marshes

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 oppose allowing private recreational, 1,500 long and six feet wide docks across publicly-owned marshlands.

Georgia's State Wildlife Action Plan identifies salt marsh as critical habitat. Docks destroy intact coastal habitats, reducing the number and diversity of threatened and endangered species.

I urge you to:
Limit single family docks to 1,000 linear feet or 3,000 square feet.

Update the Georgia dock database

Align Georgia dock regulations with those of our neighboring states.

Thank you for protecting Georgia's publicly-owned salt marsh.

Cynthia Purchase

Atlanta, GA

Patrick, Diana

From: t b <civicinput@newmode.io>
Sent: Sunday, September 27, 2026 2:08 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

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TB St Simons,

Patrick, Diana

From: Sara Micklos <civicinput@newmode.io>
Sent: Sunday, September 27, 2026 5:36 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Sincerely,
Sara Micklos
[redacted]

Patrick, Diana

From: Sharon Hindery <civicinput@newmode.io>
Sent: Sunday, September 27, 2026 6:20 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Current docks can be rediculously long already. The are visually unsightly. Wider and longer docks will create more shade which would impact the ecosystem of area in the marsh below it. Private docs are rarely used enough to justify their existance and the impact on neighbors, and those who wish to enjoy the use the water ways.

Sincerely,
Sharon Hindery
[redacted]

Patrick, Diana

From: Danielle Kraemer <civicinput@newmode.io>
Sent: Sunday, September 27, 2026 6:26 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. Marshes are one of the most effective carbon sinks in the world, as well as providing an incredible amount of biodiversity. For the sake of both humans and our environment, it is our duty to keep these areas as untouched and natural as possible.

The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Danielle Kraemer
[redacted]

Patrick, Diana

From: Alice Vaughan <civicinput@newmode.io>
Sent: Sunday, September 27, 2026 9:41 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

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Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Enough catering to the ultra-wealthy. The marsh needs and deserves protection. Tripling the size of docks into the marsh in irresponsible. Sincerely,
Alice Vaughan
[redacted]

Patrick, Diana

From: Jerry Lamb <civicinput@newmode.io>
Sent: Monday, September 28, 2026 10:00 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Sincerely,
Jerry Lamb
[redacted]

Patrick, Diana

From: John and Nancy Crosby <civicinput@newmode.io>
Sent: Monday, September 28, 2026 11:48 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
John and Nancy Crosby
[redacted]

Patrick, Diana

From: Elizabeth Sutton <civicinput@newmode.io>
Sent: Monday, September 28, 2026 11:55 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

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Sincerely,
Elizabeth Sutton
[redacted]

Patrick, Diana

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Sincerely,
John and Nancy Crosby
[redacted]

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Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
John and Nancy Crosby
[redacted]

Patrick, Diana

From: Carolyn Griffin <civicinput@newmode.io>
Sent: Monday, September 28, 2026 2:43 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Carolyn Griffin
[redacted]

Patrick, Diana

From: Nancy Maier <civicinput@newmode.io>
Sent: Monday, September 28, 2026 3:49 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Nancy Maier
[redacted]

Patrick, Diana

From: Michael Colston <civicinput@newmode.io>
Sent: Monday, September 28, 2026 4:27 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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,

My name is Michael Colston and my wife and I have only recently moved to the Georgia coast for it's beauty and her college opportunities in Coastal Ecology. I have been a Georgia resident since I was an infant and I have seen what over development and a lack of regulations has done to the counties South of Atlanta.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource. Please weigh the public's outcry when making your final decision.

Sincerely,
Michael Colston



Patrick, Diana

From: Mary Meade Sipple <[redacted]>
Sent: Tuesday, September 29, 2026 6:37 AM
To: Comments, CRD
Subject: Private Dock 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.

Dear Members of the Georgia Department of Natural Resources Board and Coastal Resources Division:

Thank you for the opportunity to comment on the proposed rules governing private docks in Georgia's state-owned tidal waters.

As a resident of coastal Georgia, I appreciate DNR's effort to establish clear and consistent rules for private docks. Property owners should have reasonable access to our waterways. At the same time that access must be balanced with our responsibility to protect Georgia's salt marshes and tidal waters, which belong to all Georgians and are held in trust for future generations.

I am concerned that the proposed rules allow private dock walkways to be as much as six feet wide and 1,500 feet long without establishing an overall limit on the amount of public marsh that an individual dock may cover.

The issue is not whether Georgians should be allowed to have private docks. The question is how much of a public natural resource should be occupied by a private structure and what safeguards should be in place.

I respectfully ask DNR to strengthen the proposed rules in several important ways:

- Establish a meaningful maximum size for private docks. To comply with the standard established in the Coastal Marshlands Protection Act, the total impact of a private dock over state-owned tidal water bottoms should not exceed 0.10 acre to be considered minor. This would continue to provide flexibility for property owners while limiting the amount of public marsh affected by an individual private dock.
- Require larger docks or exceptions to be justified by need and science. Exceptions should not be granted simply because a larger structure is desired. Any departure from established standards should consider impacts such as marsh shading, habitat fragmentation, navigation, water quality, wildlife, viewsheds, and neighboring properties.
- Clarify the rules for rebuilding and modifying existing docks. The regulations should not unintentionally create a pathway for older, smaller docks to be expanded to the larger new standards simply because they require repair or reconstruction.
- Provide meaningful notice and public review when exceptions are requested. Adjacent property owners and the public should have sufficient information and an opportunity to comment when a proposed dock could have greater impacts on shared waterways and marshlands.
- Improve oversight and accountability. Georgia should maintain an accurate database of private docks, consider reasonable application fees to support DNR review and enforcement, and establish professional standards for dock construction.

Georgia's salt marsh is one of our state's greatest natural assets. It protects our communities, supports wildlife and fisheries, and is central to the character and economy of our coast. Once

these public marshlands are fragmented or impaired, the consequences can extend well beyond an individual property.

I urge DNR to adopt clear, science-based standards that provide reasonable private water access while keeping protection of Georgia's publicly owned marshes and tidal waterways at the center of these regulations.
Thank you for protecting our coast!

Mary Meade Sipple
Trustees' Garden Club
Savannah, GA

Patrick, Diana

From: Charles Wilsdorf <civicinput@newmode.io>
Sent: Tuesday, September 29, 2026 10:50 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger dock rules

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Dear Ms. Andrews,

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Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Charles Wilsdorf
[redacted]

Patrick, Diana

From: Betsy Cain <civicinput@newmode.io>
Sent: Tuesday, September 29, 2026 11:52 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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September 29, 2026

Dear Ms. Andrews,
Thank you for the opportunity to speak to the current draft rules for private docks being considered by Coastal Resources Division on behalf of the citizens of Georgia.
Our house [redacted], Chatham County sits in the shadow of a 980' dock built in 2007. The dock was fast tracked with notice to only adjacent property owners whose lots are approximately 100' in width. This marsh is located in a shallow tidal basin off Tom Creek and Half Moon River with no history of long docks until this dock was permitted.
The subsequent damage from annual wrack accumulation collected by this dock over 19 years has led to the continued, slow degradation of healthy marsh along a long stretch of marsh front property far beyond the lots adjacent to the dock site. I would estimate the impact zone to be as great or greater than the length of this long dock, easily 1,000 feet plus. Both sides of the dock have been impacted.
Wrack impacts documented over the years include upland marsh being stripped of healthy marsh from suffocation, turning into mud flats and dead pan flats. Tidal creeks lose their definition as the creek beds collapse with the loss of the powerful root system from the Spartina Alterniflora marsh grass. We lose access to our creek from its inability to hold water as the tides recede.
These upland zones are crucial for bank stabilization and reduction of damage from tidal forces and waves with high tides and storms, an important consideration if your home is located on the marsh. These zones are also biodiversity hotspots and crucial to all organisms living in the marsh.
Docks place these critical areas in jeopardy, long docks even more so by interrupting the natural movement of wrack flushing up and down the coast, into eddies and on beaches, out into the ocean, offering valuable nutrients to marine and wild life. Trapped wrack destabilizes everything.
How do we balance the critical health of our salt marsh and property owners' ability to access the tidal waterways? (Not to mention a more broad public access for those not privileged to own marsh/waterfront front property?) We do it by sound conservation, science and careful consideration of rules being considered that do determine significant outcomes.
The current proposal/rules for docks seems to go in the wrong direction, allowing for longer docks, broader walkways, larger expanses over the marsh, interrupted view sheds, all to benefit the few that can afford such luxury. The majority consensus is clear, please amend the draft rules to reflect the overwhelmingly strong response from our citizens as well as significant environmental groups and stakeholders to reinstate/review existing standards.
Let's put our energy and money into keeping our valuable salt marsh protected from these overreaches, into community docks for a larger number of citizens..and in public access areas so more citizens can participate in what our salt marsh offers: recreation and livelihood for many, not to mention a profound beauty and one of the greatest ecosystems in the world.

Thank you,

Betsy Cain

[redacted]

Patrick, Diana

From: ETHELYN SIMPSON <[redacted]>
Sent: Tuesday, September 29, 2026 1:58 PM
To: Comments, CRD
Subject: proposed 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.

Good afternoon,

I am writing to express my opposition to the proposed changes to current dock regulations that would significantly increase the length and size allowed for private docks in Georgia.

Our shorelines and marshes are one of the most beautiful things about Georgia's coastal areas and waterways, and larger docks will only serve to diminish the beauty of those shorelines and marshes.

Please keep the status quo. We don't need bigger/longer docks.

Thank you very much for your consideration of my comments.

Ethelyn Simpson
[redacted]

Patrick, Diana

From: Andrews, Jill
Sent: Wednesday, September 30, 2026 7:09 AM
To: Comments, CRD
Subject: FW: comment on PRD Rules
Attachments: Shipman private dock comments.doc

From: Susan Shipman [redacted]
Sent: Tuesday, September 29, 2026 11:16 PM
To: Andrews, Jill <Jill.Andrews@dnr.ga.gov>; Haymans, Doug <Doug.Haymans@dnr.ga.gov>
Subject: comment on PRD 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 am submitting my comment on the Proposed Rules for Private Docks in State Owned Tidal Waters.
I appreciate the opportunity to comment.

All best,
Susan

Susan Shipman

[redacted]

September 30, 2026

Georgia Board of Natural Resources
Coastal Committee
2 Martin Luther King Drive
Suite 1252
Atlanta, GA 30334

Dear Board Members:

Georgia's nearly 400,000 acres of coastal marshlands are not only one of our coast's most defining natural treasures—but one held in trust for *all* Georgians, underpinned by the public trust doctrine. This principle holds that seas, the shores of those seas, and the resources living within these waters are common to all mankind and are not the property of any man, but are instead public property for the use of any person. The Public Trust Doctrine is a core principle underpinning natural resource conservation . It establishes a trustee relationship of government to hold and manage wildlife, fish, and waterways for the benefit of those resources and the public. And while an individual may have a valid crown or state grant to marshlands, their ownership is of the subservient title. The sovereign --- in Georgia's case, the State, retains ownership of the dominant title and cannot relinquish it. The entities with valid crown or state grants must still obtain revocable licenses from the State to construct private docks in the marsh.

As the nation celebrates our semiquincentennial, a review of the public trust's history is pertinent. The Doctrine has its origins in Roman civil law under Emperor Justinian in the early 500's. The Justinian Institutes required that the seas and tidal land remain open for fishing and navigation for all. The Justinian Institutes were reaffirmed by the Magna Carta in 1215 and redefined by English Common Law in 1641 which assigned ownership of common property to the King as the trustee of these properties for the benefit of the people. English common law applied to the original 13 colonies and was assigned to the states following American independence. In Georgia the General Assembly in 1778 adopted all statutory and common law of England existing at the time of the Revolution which was not in conflict with U.S. or Georgia Law. At the time of our statehood, Georgia assumed ownership of the King's property, which included the lands subject to the ebb and flood of the tides, and in turn, Georgia's thousands upon thousands of acres of magnificent saltmarsh.

Today this public resource is facing new pressures from private interests, as the DNR Board considers a proposed new rule that would significantly expand the size of private recreational docks to allow structures up to 1,650 feet long and six feet wide to cross tidal saltmarsh. Such a

dock would have a "footprint" just shy of 10,000 square feet in the public marshes of the state. This current proposal far exceeds our neighboring states' standards, putting our common property resources and public access at risk.

As a former Director of DNR's Coastal Resources Division, I appreciate the Division's need for clear, consistent standards for dock review that ensure public access and safety while also protecting our marshlands. In response to the population growth on Georgia's coast in the early 2010's and the resulting increase in development pressures, the Division prioritized marsh protection standards and green growth initiatives to support sustainable growth without compromising our coastal ecosystems for future generations to enjoy.

I urge you to enact strong, science-based standards to allow for realistic, minor alterations of our public marshlands *without* fragmenting habitat, damaging marsh ecology, marring natural vistas, and disrupting wildlife for the benefit of a few. The proposed allowance for exceptionally large private docks risks doing just that. The Georgia coast we want for our grandchildren's enjoyment is too valuable to be carved up by larger private docks without stronger safeguards. DNR must accept its Trustee role and adopt dock rules that protect habitat, wildlife, and reasonable public access

Respectfully,

Susan Shipman

Susan Shipman
St. Simons Island

Patrick, Diana

From: Virginia McKenna <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 7:10 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger dock rules!

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We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Virginia McKenna
[redacted]

Patrick, Diana

From: Alice M. Keyes <alice@onehundredmiles.org>
Sent: Wednesday, September 30, 2026 7:09 AM
To: Comments, CRD
Cc: Nancy Addison; Rabon, Walter; billjonesiii@seaisland.com
Subject: Comments on Draft Rule 391-2-1
Attachments: OHM Comments - Sept 2026 FINAL.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 letter regarding the posted draft rule 391-2-1 regarding private docks. These comments and recommendations are submitted on behalf of the members and board of One Hundred Miles.

Contact me at any time if you have any questions or need additional information.

Thank you for your service,
-- Alice

Alice M. Keyes
One Hundred Miles
912-230-6494
www.OneHundredMiles.org

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

September 30, 2026

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

MILES
PROTECTING GEORGIA'S COAST FOREVER
7 Glynn Avenue
Brunswick, GA 31520
www.OneHundredMiles.org
912.264.4111

RE: Comments on proposed 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 contributed substantial staff time and resources to the stakeholder committee convened in July 2024 and continue to support the consensus recommendations submitted to the Coastal Resources Division (CRD) in March 2025.[1] **We therefore regret that we cannot support the draft rules released in August 2026.** As written, the proposed rules depart from long-standing, science-based standards, create significant ambiguity in the management of public marshlands and tidal waters, and authorize private structures at a scale that exceeds what has historically been permitted under Georgia's coastal management framework.

On behalf of the more than 1,700 members across the Georgia coast and beyond and our dedicated Board of Directors, OHM urges the Georgia CRD to revise the proposed rules in four fundamental ways:

1. **Restore meaningful limits on the dimensions and marsh alteration of new private docks;**
2. **Clarify the standards governing modification, reconstruction, and maintenance of existing docks so these activities do not become pathways for expansion;**
3. **Remove the proposed variance process until CRD develops objective, science-based criteria through further technical and public review; and**
4. **Strengthen notice, documentation, administrative, and enforcement provisions to protect neighboring property owners and public resources.**

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

[1] Process Summary Report on the Private Recreational Docks Rulemaking Stakeholder Committee, March 12, 2025: https://coastalgadnr.org/sites/default/files/crd/pdf/ProjectandProcessReport.pdf

coastal marshlands for succeeding generations."[2] 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 impact marsh habitat, water quality, navigation, and neighboring property owners.

Accordingly, the rules governing private dock licenses should provide predictable access for marsh front property owners while ensuring that private use of public resources remains limited and causes minimal marshland impact. Unfortunately, the proposed rules do not strike that balance. If adopted without revision, the draft rules would allow substantially larger structures and greater marsh impacts than existing standards while weakening important safeguards intended to protect Georgia's coastal resources.

Most concerning, **the draft rules allow private recreational docks to far exceed the baseline maximum dimensions currently allowed for commercial docks, community docks, and marinas** outlined under Georgia's CMPA and associated regulations.[3] 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 rules will allow a private dock to include a 1,500 linear foot walkway (or 1,650 feet if a variance is granted). This length exceeds the allowable length of private docks in surrounding states (South Carolina and Florida prohibit walkways that exceed 1,000 feet in length).[4] The draft rules will result in diminished productivity and quality of habitat in our public marshes and will affect the public's ability to enjoy undeveloped marshlands and waterways. Specifically, if passed, the draft rules will:

- Impact boating and sailing experiences. Allowing 1,500 linear foot walkways will enable the construction of docks in areas of the coast that have been enjoyed as spaces for unencumbered boating and sailing. Georgia law limits anchoring within near a marine structure, defined to include private docks.[5] Georgia law referred to as "Rules of the road for boat traffic," also prohibits all vessels, including jet skis, from operating at a speed greater than idle speed when within 100 feet of a dock.[6]

- Fragment critical wildlife habitat for threatened and protected marsh species. Docks fragment estuarine habitats necessary for species listed as those of greatest conservation need in the State Wildlife Action Plan (SWAP).[7] Long structures, like docks, introduce pathways for predators to access habitat used by marsh birds for nesting,

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[2] 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).

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

[4] Andrews, J. (2023) "Private Recreational Dock Management in Georgia – Historical Overview" https://coastalgadnr.org/sites/default/files/crd/pdf/240123_PrivateRecreationalDockSummary.pdf

[5] O.C.G.A. 52-7-8.4(a)(1) "Anchorage restriction area" means areas within the estuarine areas of this state in any location that lies within 300 feet of a marina, 150 feet from a marine structure other than a marina..." and O.C.G.A. 52-7-8.4(a)(6) "Marine structure" means a public or private dock, pier, bridge, or wharf. Marine structures include, but are not limited to, marinas, boat ramps, boatyards, or other vessel launching or loading facilities."

[6] O.C.G.A 52-7-18(f) "No person shall operate any vessel or tow a person or persons on water skis, an aquaplane, a surfboard, or any similar device on the waters of this state at a speed greater than idle speed within 100 feet of any vessel which is moored, anchored, or adrift outside normal traffic channels, or any wharf, dock, pier, piling, bridge structure or abutment, person in the water, or shoreline adjacent to a full-time or part-time residence, public park, public beach, public swimming area, marina, restaurant, or other public use area..."

[7] State Wildlife Action Plan 2025 - https://georgiawildlife.com/WildGeorgiaSWAP

foraging, and protection.[8] Researchers also found that obligate marsh birds were twice as abundant in marshes without docks than in marshes with docks.[9]

- Alter healthy marshlands. Studies by respected Georgia scientists have documented dock construction and expansion alters marsh vegetation,[10] accumulates wrack that negatively affects the health of marsh grass surrounding docks,[11] and impacts water quality and water flow.[12]

A private dock with 1,500 linear foot walkway (or 1,650 feet if a variance is granted) at six (6) feet wide, implies a total of 9,000-9,900 square feet. Targeted research conducted by Dr. Clark Alexander at the Skidaway Institute of Oceanography documents that the footprint of a dock shades out the marsh grass underneath affecting saltmarsh productivity.[13] Additionally, Dr. Alexander documented that wrack accumulated in/around docks can have a significant negative impact on marsh productivity,[14] thereby altering the marshlands. **9,000+ square foot structures within Georgia's estuarine system will alter marshlands beyond the legal definition of "minor alteration" of marshlands, incongruous with the spirit, intent, and history of the CMPA.** (See recommended change for Section 391-2-1-.04(2) below on page 6 of this letter.)

New statewide 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, the draft rules as currently proposed risk establishing a precedent that could erode the stronger protective standards currently applicable to commercial docks, community docks, and marinas.

To mitigate these and other negative consequences of the draft rules, we offer the following recommended changes.

SECTION 391-2-1-.02: Definitions

- Add a definition of multi-family dock, as introduced in the draft 2024 rule.[15] This addition will clarify the use of the term in the draft rule, such as 391-2-1-.03(2), (2)(h); .04(1), and .04(8)(b).

  Recommended change: ADD ""Multi-family dock" means a private dock shared by the owners of up to four adjoining riparian lots meeting the exemption in O.C.G.A. 12-5-295(7.1)."

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[8] Schwarzer et al. (2020) "Factors influencing occupancy and density of salt marsh songbirds in northeast Florida. Journal of Field Ornithology 91(2):156-169.
[9] Banning et al. (2009) "Effects of Long Piers on Birds in Tidal Wetlands. Journal of Wildlife Management. 73(8). https://wildlife.onlinelibrary.wiley.com/doi/abs/10.2193/2007-571
[10] "Quantifying the Ecological Significance of Marsh Shading: the impact of private recreational docks in Coastal Georgia." (2006) Submitted to GA CRD by C. Alexander and M. Robinson; and "GIS and Field-Based Analysis of the Impacts of Recreational Docks on the Saltmarshes of Georgia" (2004) Prepared for Georgia Coastal Zone Management Program by C. Alexander and M. Robinson.
[11] "Wrack Assessment Using Aerial Photography in Coastal Georgia" (2008) by C. Alexander, Skidaway Institute of Oceanography.
[12] "Environmental Effects of Docks and Marinas" (2005) Prepared for the Georgia Coastal Research Council stakeholder workgroup by M. Alber and J. Flory.
[13] "Quantifying the Ecological Significance of Marsh Shading: The impact of Private Recreational Docks in Coastal Georgia." (2006) by C. Alexander and M. Robinson. https://www.skio.uga.edu/wp-content/uploads/2025/06/dockshading_on_biomass2006.pdf
[14] "Wrack Assessment using Aerial Photography in Coastal Georgia" (2008) by C. Alesander. https://www.tomscreek.info/Wrack%20Assessment%20Using%20Aerial%20Photography%202008.pdf
[15] https://coastalgadnr.org/sites/default/files/crd/pdf/CRDItemAPrivateDockBriefingJan2024.pdf

- Clarify the definition of (16) "modification" and (21) "reconstruction."

    - The draft rules 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.

    - 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 inconsistent 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.

      Recommended change: 391-2-1-.02(16) "Modification" means any addition or change to the footprint of, or reconfiguration of an existing or licensed private dock, that requires issuance of a new revocable license."

      Additional change: See recommendation below in Section 391-2-1-.05 (page 7 of this letter).

- 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." 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 golf cart.

    - "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."

Recommended change: 391-2-1-.02 (25) "Serviceable" means usable as is or with only minor maintenance but not so degraded as to cause safety concerns and essentially require reconstruction, as determined by the department."

- 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.

  Recommended change: 391-2-1-.02 (24) "Scaled drawing" means a representation of a real object or space prepared by a qualified professional where all dimensions are proportionally reduced or enlarged by a specific ratio, called the scale, ensuring the drawing maintains the exact shape and relationships of the original."

- Eliminate the definition of variance, based on the validation presented below in Section 391-2-1-.07.

  Recommended change: DELETE 391-2-1-.02(29)

  Additional change: See recommendation below in Section 391-2-1-..07 (page 8 of this letter).

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." We recommend that the department 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.

  Recommended change: 391-2-1-.03(1) "..evidence that adjacent property owners were appropriately notified of the application and provided accurate drawings, dock specifications, and demarcation of dock corridors..."

- It is good to see that Subsection (2)(h) requires applicants for multi-family docks to include a covenant that prohibits future private docks. We recommend the agency 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.

  Recommended change: 391-2-1-.03(2)(h) "Applicants for a multi-family dock have entered into a binding covenant that runs with the land, in favor of the state, which covenant prohibits the building of any future private docks on their lots unless the mutti-family dock is removed or is approved by the department to be converted to a single-family private dock. In the case that a multi-family dock is proposed to be converted to a single-family private dock, applicant must provide documentation of subdivision or unification of lots to the department."

- 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.

Recommended change: ADD 391-2-1-.03(k) "Applicants 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

- Section 391-2-1-.04(2) of the draft rules allows 1,500 linear feet at 6 feet wide, which totals 9,000 square feet, equating to 0.21 acres. If a full variance is granted, that footprint increases to 9,900 square feet or 0.23 acres.

- 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."[16] 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."[17]

- **9,000+ square foot structures within Georgia's estuarine system will alter marshlands beyond the legal definition of "minor alteration," incongruous with the spirit, intent, and history of the CMPA.**

- Amending the draft rule to include a maximum square footage or maximum marshland alteration will align with South Carolina and Florida's dock standards. Both surrounding states prohibit private dock walkway length to exceed 1,000 feet, and Florida limits private docks to 2,000 square feet.[18]

  Recommended change: Section 391-2-1-.04(2) "One fixed walkway, up to 1,000 feet long and six feet wide, but not altering more than 0.10 acres of marshlands per Rule 391-2-3-.03(2)(q), 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."

- Including in the final rules an allowable square footage that does not alter more than 0.10 acres of marshlands grants flexibility to the property owner to construct a dock that is compliant with American Disabilities Act (ADA) standard for walkways (which is 36 inches.)[19] Providing an extra foot of width beyond ADA design standards would allow for a dock that is could accommodate people in wheelchairs, while not exceeding the 0.10 acres alteration of the marsh.

- It is our understanding that a key motivation for the proposed rule changes is to allow dock walkways wide enough to accommodate golf carts.[20] 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.

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[16] O.C.G.A. §12-5-282(9)
[17] Rules and Regulations of the State of Georgia 391-2-3-.03(2)(q)
[18] https://coastalgadnr.org/sites/default/files/crd/pdf/240123_PrivateDockStateComparison.pdf
[19] Chapter 4: Accessible Routes, American Disabilities Act (ADA) - https://www.access-board.gov/ada/guides/chapter-4-accessible-routes/#clearances
[20] DNR Board Coastal Committee Meeting, May 2026: https://dnr.box.com/s/cerige2sbsx5h4j4jtt47b39ixt6eiqu

- Subsection (8) should be amended to add that floating docks shall not lie less than two feet above the water bottom at MLW or cradles must be used to support the floating dock at least two feet above the water bottom. This standard was discussed by the stakeholder committee, and it was agreed to maintain the standard as it was proposed in the draft 2024 rules.[21]

  Recommended change: 391-2-1-.04(8) "Floating docks should be pile supported; they shall not lie less than two feet above the water bottom at MLW or must be cradled to support the floating dock at least two feet above water bottom; and they must not be located over vegetation..."

- 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.

  Recommended change: 391-2-1-.04(12) "... Applicants must provide proof of application for a local electrical permit and all other requisite local and state building permits before a revocable license is issued."

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 (page 4 of this letter).

  Recommended change: 391-2-1-.05(2) "Reconstruction of existing, serviceable dock components is permissible in the original footprint and configuration. Reconstruction of dock components deemed not serviceable by the department must also adhere to original licensed footprint and configuration."

  Recommended change: 391-2-1-.05(3) "Modifications to existing or licensed private docks that exceed the original footprint and configuration must apply for a new revokable license through the department."

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

- As expressed in this letter, the draft rules grant the applicant the ability to rebuild a fully functional dock beyond the existing footprint but in compliance with the new standards that far exceed what has previously been permitted and exceeding the definition of a "minor alteration" to the marshlands.[22]

  Recommended change: 391-2-1-.06(3) "Before beginning major maintenance activities, the licensee must notify the department which will determine the serviceability of the existing dock. If the department finds the private dock or parts are unserviceable, it cannot be maintained (except when the dock was rendered not serviceable due to forces of nature or other events described in

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[21] Briefing on proposed amendment of Subject 391-2-1 of the Rules of the Department of Natural Resources to establish rules for private docks January 23, 2024.
https://coastalgadnr.org/sites/default/files/crd/pdf/CRDItemAPrivateDockBriefingJan2024.pdf

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

391-2-1-.06 (5), below); however, it may be reconstructed in its original footprint and configuration, according to Rule 391-2-1-.05."

SECTION 391-2-1-.07: Variances

- Variances to standards and conditions only add confusion to the already complicated process, so this section should be struck from the draft rule and only revisited after more research is conducted by the CRD in coordination with other divisions and agencies.

- As was recommended by the private recreational dock stakeholder committee, CRD should not codify 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.)."[23]

  Recommended change: DELETE section 391-2-1-.07 in its entirety.

- Only after investigating a possible model with scientists, biologists, and experts in the field, as recommended by the stakeholder committee, the department could pursue a variance process considering conditions of "hardship" which would qualify an applicant to request exceedance of the private dock standards The following conditions should be included to any variance process pursued by the department:

  - Include a requirement that a variance 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 9,900 square feet long (0.23 acres) exceeding the 0.10 acres threshold Georgia's CMPA identifies as a "minor alteration" of marshlands and, as applicable in some cases, the U.S. Army Corps of Engineers requirement for compensatory mitigation of wetland impacts.

  - Remove the possibility for additional boat hoists. Imposing such structures has a major and lasting impact on the surrounding property owners outdoor experience 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.

- As discussed in Section 391-2-1-.04, if the intent of a six (6) foot wide walkway 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

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

sufficient space for a golf cart 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.

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

- Add a section instituting a fee-based system for application to be processed and fines for non-compliance with any of the standards and conditions set forth in the new rules. We recommend that the rules dictate that both fees and fines be dedicated to supporting CRD for staff review and evaluation of applications, requisite staff site visits, and clean-up efforts as needed after storm events.

  Recommended change: ADD 391-2-1-.09(4) "The department is authorized to charge a reasonable fee for each application submitted for review by the department. Fees will be dedicated to supporting departmental application review, consultation with applicants, site visits, and removal of coastal marine debris caused by forces of nature."

  Recommended change: ADD 391-2-1-.09(5) "In the case of violation of provisions of this rule, the department may fine a licensee found to be out of compliance with the standards and conditions set forth in Rule 391-2-1. Such fees shall be used by the department to support staff in application review, inspections, and removal of coastal marine debris caused by forces of nature."

Additional Recommendations:

This draft rules should be amended to also accommodate the following:

- Invest in an updated and accurate dock database. Common sense dictates that we should not increase activities that result in alterations 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.

- Develop a Georgia Coastal Dock Builder Certification program. South Carolina has a robust program that Georgia could use as a model.

To conclude, OHM appreciates CRD's effort to establish clear and transparent standards governing revocable licenses for private docks. Codifying these standards presents an important opportunity to provide greater certainty for waterfront property owners, neighboring landowners, agency staff, and the public while ensuring that Georgia's coastal marshlands and tidal waters remain protected.

Codification, however, should not become a vehicle for weakening long-standing protections. Any final rule should be grounded in science, consistent with the protective purposes of the CMPA and informed by research documenting marsh alteration associated with dock construction and expansion, wrack accumulation, and water quality and flow. Investigations

must also incorporate new data from recent research that indicates Georgia's marsh ecosystems, underground biomass in particular, are experiencing stress and decline.[24]

We therefore urge CRD and the DNR Board to revise the proposed rules before adoption by:

1. restoring meaningful limits on dock dimensions and marsh impacts,
2. ensuring that modification, reconstruction, and maintenance do not become pathways for expansion of existing docks,
3. removing the proposed variance process until objective, science-based criteria have been developed through appropriate technical and public review, and
4. strengthening notice, documentation, and oversight provisions.

Georgia's coastal marshlands and tidal waters are a public resource held in trust for present and future generations. Private access to those resources can and should be responsibly accommodated, but that access must remain consistent with DNR's responsibility to protect ecological functions and public values that make Georgia's coast extraordinary.

Thank you for your service to the State and for your careful consideration of these comments. Please contact me if OHM can provide additional information or clarification regarding any of these recommendations.

Sincerely,



Alice M. Keyes
Senior Conservation Strategist

One Hundred Miles, Inc.
912-230-6494
alice@onehundredmiles.org

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

[24] "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

Patrick, Diana

From: Nicolas Zart <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 7:37 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I hope that you will read this entire email as I took the time and energy to draft it representing what so many people think and feel is best for our unique coast.

I am writing to urge the Board of Natural Resources to see the results of eyesore sprawling boardwalks on our unique coastline and reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few. Lobbyism has no place in our already aggravated environment. OPur children will pay a higher price than what we're already paying for.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for representing all of our greater interests keeping our unique environment as damage-free as possibke. Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Nicolas Zart
[redacted]

Patrick, Diana

From: Ansley Carve <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 7:59 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Ansley Carve
[redacted]

Patrick, Diana

From: Alice Dunick <[redacted]>
Sent: Wednesday, September 30, 2026 8:05 AM
To: Comments, CRD
Subject: Long docks

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To Whom It May Concern:

I am opposed to allowing the construction of long docks because of the damage these docks present to our salt marshes. Please do not change present rules.

Thank you for your attention.

- Alice Dunick

Sent from my iPad

Patrick, Diana

From: Parkman, Henry <[redacted]>
Sent: Wednesday, September 30, 2026 8:43 AM
To: Comments, CRD
Subject: Comments in opposition to proposed Rules 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.

Attention: Jill Andrews, Coastal Resources Division

I have been a Georgia resident and property owner since 1986. My wife and I bought property on Tybee Island in 2003. The Georgia salt marsh is a rare and valuable resource worthy of careful protection. I oppose the proposed rule on private docks in the State-owned marsh on two principal grounds.

First, the Coastal Resources Division has ignored the process intended for rulemaking, including the consensus report prepared by the stakeholder group and other input of stakeholders and the public. Second, the substance of the proposed rules will result in harm to Georgia's unique marsh resource for the benefit of only a few people.

I ask CRD not to adopt the proposed rules but to modify them to accommodate the interests and concerns highlighted in the stakeholder consensus report.

Respectfully submitted,
Henry Parkman

[redacted]

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Patrick, Diana

From: Libby Miller <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 8:48 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Libby Miller
[redacted]

Patrick, Diana

From: V. Kevin Lang <[redacted]>
Sent: Wednesday, September 30, 2026 8:51 AM
To: Comments, CRD
Subject: Private Dock Regulations | 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.

Jill:
I read with interest Mary Lander's September 29,2025 story regarding DNR's new proposed rules for the establishment of private docks. The story paints a pretty clear picture of rule making being shaped by the interests of particular private land owners. Judd Turner's emails clearly indicate that the contours of the new regulations are being shaped to meet the needs of particular private landowners and the engineers and dock builders that stand to profit from the loosening of existing regulations. DNR has received pages and pages of well developed comments pointing out that longer and wider docks increase the negative impacts on salt marsh. DNR's job is to protect the resource for the benefit of the public. The State of Georgia owns almost of all our coastal marshlands, and our State acted decisively to protect and conserve this resource by passing the Coastal Marshlands Protections Act. The new proposed dock regulations will increase the known negative impacts of shading and fragmentation of this important habitat for birds, fiddler crabs, fish, shrimp and other creatures that depend on our saltmarshes. DNR needs to extend its consideration of these new regulations, particularly in light of the disclosure of Judd Turner's emails with DNR staff members. DNR's failure to consider comments from the conservation community coupled with this evidence of special interests shaping the new regulations presents a problem for CRD. I would encourage CRD to extend its consideration of the comments offered and delay putting the new regulations in from the DNR Board in October.

FBG | FORTSON, BENTLEY & GRIFFIN, P.A.
ATTORNEYS AT LAW

V. Kevin Lang | Fortson, Bentley and Griffin, P.A.
[redacted]

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Patrick, Diana

From: Eliot Joanna Angell <[redacted]
Sent: Wednesday, September 30, 2026 9:00 AM
To: Comments, CRD
Subject: Private 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.

To whom it may concern:
Please protect our waterways and maintain current regulations or strengthen them regarding the length of private docks. I am a concerned citizen of our beautiful lowcountry in Chatham County.
It is simply unfair to wildlife and many people to allow the interests of a few to effect the health of the ecology and the beauty we all can enjoy.
Please maintain the permitted length and variance without extension, or tighten regulations.

Thank you for your consideration,
Joanna Angell, Chatham County

--

[redacted]

Patrick, Diana

From: Patsy Munden <[redacted]>
Sent: Wednesday, September 30, 2026 9:12 AM
To: Comments, CRD
Subject: Private dock extension proposals by GA DNR

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To whom it may concern,

As a Savannah resident and homeowner for nearly 40 years, I am strongly opposed to the proposed dock lengths for private recreational docks.

If a wealthy individual wants to live on a river and not be subject to launching watercraft dependent on tides and other natural conditions, please use common sense and move to the banks of open water. Don't bribe public officials so you can be a lazy destructive bad citizen.

Perhaps DNR now stands for Destruction of Natural Resources?

Do not think for a minute this behavior is going unnoticed and will not be punished at the ballot box. I'll be voting against any Republican running for office in the midterms.

Sincerely,

Patsy Munden
Savannah, GA

Patrick, Diana

From: Steve Crowder <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 9:35 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Steve Crowder
[redacted]

Patrick, Diana

From: Alice M. Keyes <alice@onehundredmiles.org>
Sent: Wednesday, September 30, 2026 9:33 AM
To: Comments, CRD
Subject: Supplemental comments regarding private dock rule
Attachments: Private interests overshadow stakeholders for new DNR dock rules - The Current.pdf; New rules could double size of private docks in Coastal Georgia - The Current.pdf; Proposed dock rule revisions expand marsh coverage and shading, irking environmentalists | Local News | thebrunswicknews.com.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 media articles as supporting documents to the comments submitted from One Hundred Miles earlier today regarding rules for private docks in Coastal Georgia.

Please contact me at any time if you have any questions,

-- Alice

Alice M. Keyes
One Hundred Miles
912-230-6494
www.OneHundredMiles.org

THE CURRENT
DONATE

ENVIRONMENT

Private interests overshadow stakeholders for new DNR dock rules

A former EPD commissioner, consulting group make end runs around public process.



by **Mary Landers**

September 29th, 2026

Why you can trust The Current



A 980-foot dock stretches across the salt marsh on Wilmington Island on Sept. 28, 2026. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

A 12-member stakeholder group representing homeowners, builders, local officials, environmental

organizations, and technical experts spent months meeting and crafting new rules for private recreational docks in Coastal Georgia.

But the recommendations from this public-facing group are not what's shaping the limits on dock size in draft regulations the public has until Wednesday to weigh in on.

Instead, a former EPD commissioner and consultants who represent clients seeking to build long docks across the publicly owned marsh have been working behind the scenes to push for relaxed limits on length, correspondence *The Current GA* obtained through an Open Records Request shows.

In an email dated June 11, 2026, former EPD commissioner Jud Turner – now a partner with Atlanta-based law firm Fortson, Blalock, Turner & Germany – wrote to Alton Brown and Dan Bucey of Resource + Land Consultants with the subject "Coastal Coalition CRD Mess." The email was later included in a string sent to the DNR.

"Rulemaking – sounds like the Board is headed in the right direction, but we need to pour gas on their fire," Turner wrote in part. He suggested highlighting to the DNR officials a minority report of the stakeholders' group that allowed for longer docks. Bucey, a member of the stakeholder group, supported the minority report.

Turner goes on to write that the proposed length of 1,000 feet with a possible variance for another 10% wouldn't be enough for the docks two individuals were planning.

"New issue for us is that a 10% variance won't help Jack (or Munger) – so let's make sure we discuss how to get that talking point to the board members – variance without paltry 10% limit."

"Jack" is Jack Robertson of Skidaway Island, who made public comments about the draft dock regulations at the last two DNR board meetings. The full identity of "Munger" is unclear.

Turner's efforts seem successful. While the June meeting of the DNR board saw the agency present regulations to allow docks up to 1,000 feet long and six feet wide, with a variance of up to 10% on the length, those numbers didn't stand long. **Despite scores of public comments denouncing the proposed docks as too big, the agency Coastal Resources Division in August suggested** extending the permitted length to 1,500 feet with no hard limit on length if a variance was requested. The DNR board pulled back only on the unlimited variance, instead approving a draft to allow docks of the same

width but 1,500 feet long with a 10% variance available.

Neither Turner nor Brown responded to a request for comment.

As a participant in the stakeholder process, Alice Miller Keyes of One Hundred Miles spent multiple days preparing for and attending meetings only to have that effort largely set aside.

"I was appointed by CRD to serve on the stakeholder committee designed to recommend a balanced rule that enables reasonable dock access for landowners and ensures only minor impacts to shared marshlands," she wrote in an email to *The Current GA*. "We did just that when we delivered a consensus report to CRD in March 2025. It is inexcusable that some individuals felt it was their right to bypass that transparent public process for their own advantage."

Stakeholder Courtney Reich of the Georgia Conservancy is worried the interests of a few powerful people have outweighed that of the public.

"The GA DNR has a long history of effectively convening stakeholders and inviting public comment to inform management decisions, particularly when it could impact public resources such as our coastal marshlands," she wrote in an email to *The Current*. "We are concerned that the current process surrounding the development of Rules for Private Recreational Docks has not adequately considered the input of stakeholders or the public and instead rested on the interests of a few individuals."

Living near a long dock

For Wilmington Island resident Betsy Cain, the damage a long dock can engender isn't a discussion, it's a lived experience. Her neighbor added 880 feet of walkway to his 100-foot dock in 2007. Since then, Cain has struggled with the periodic buildup of trapped wrack that smothers the marsh in front of her modest home.



A dock cuts through the marsh, separating living spartina grass from an area where accumulated wrack has smothered the vegetation and left exposed mud. On Wilmington Island on Sept. 28, 2026. Conservationists argue longer docks can trap wrack and contribute to larger areas of marsh degradation. Draft rules propose allowing docks more than 50% longer than this one. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

She sent in a public comment ahead of the August board meeting detailing her experience.

"After the dock was built it collected approximately 7 acres of wrack on its north side, and blocked all creeks including ours," she wrote. "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 witnessed 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."

She's doubtful her comment made a difference to the DNR board and decision makers at the agency.

WHAT'S NEXT

Read the **proposed rule here.**

"What's critical here is that they're not talking about the damage to upland marshes from these

- **September 30, 2026:** Public comment period closes. Want to comment? Written comments will be accepted through Sept. 30, 2026. Email comments must be received by 4:30 p.m. that day, and mailed comments must be postmarked by Sept. 30. Email: crd.comments@dnr.ga.gov Mail: Coastal Resources Division Attn: Jill Andrews One Conservation Way Brunswick, GA 31520
- **October 27, 2026:** CRD will request f nal action by the Board to adopt rules, anticipated
- **Late 2026:** Rules go into effect if approved by the board

docks," she said. "And the importance of the upland marsh for habitat and also for wave retention and protection of people's property up close."

Even if officials at DNR considered her comment before, they won't be reviewing it ahead of the October 27th DNR board meeting, when the panel is scheduled to vote on the latest draft regulations. In fact, the Coastal Resources Division will not be considering any of the previous 103 comments.

"To be clear, since we are starting from scratch, we do not need to consider and respond to the comments we received on this version of the rule in future meetings," DNR attorney Kate Iannuzzi, Deputy Executive Counsel at the DNR wrote to Chief of Coastal Management Jill Andrews.

Commenters have until the end of the day Wednesday to resubmit their previous comments or send in a new one.

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EXPLAINER: ENVIRONMENT

New rules could double size of private docks in Coastal Georgia

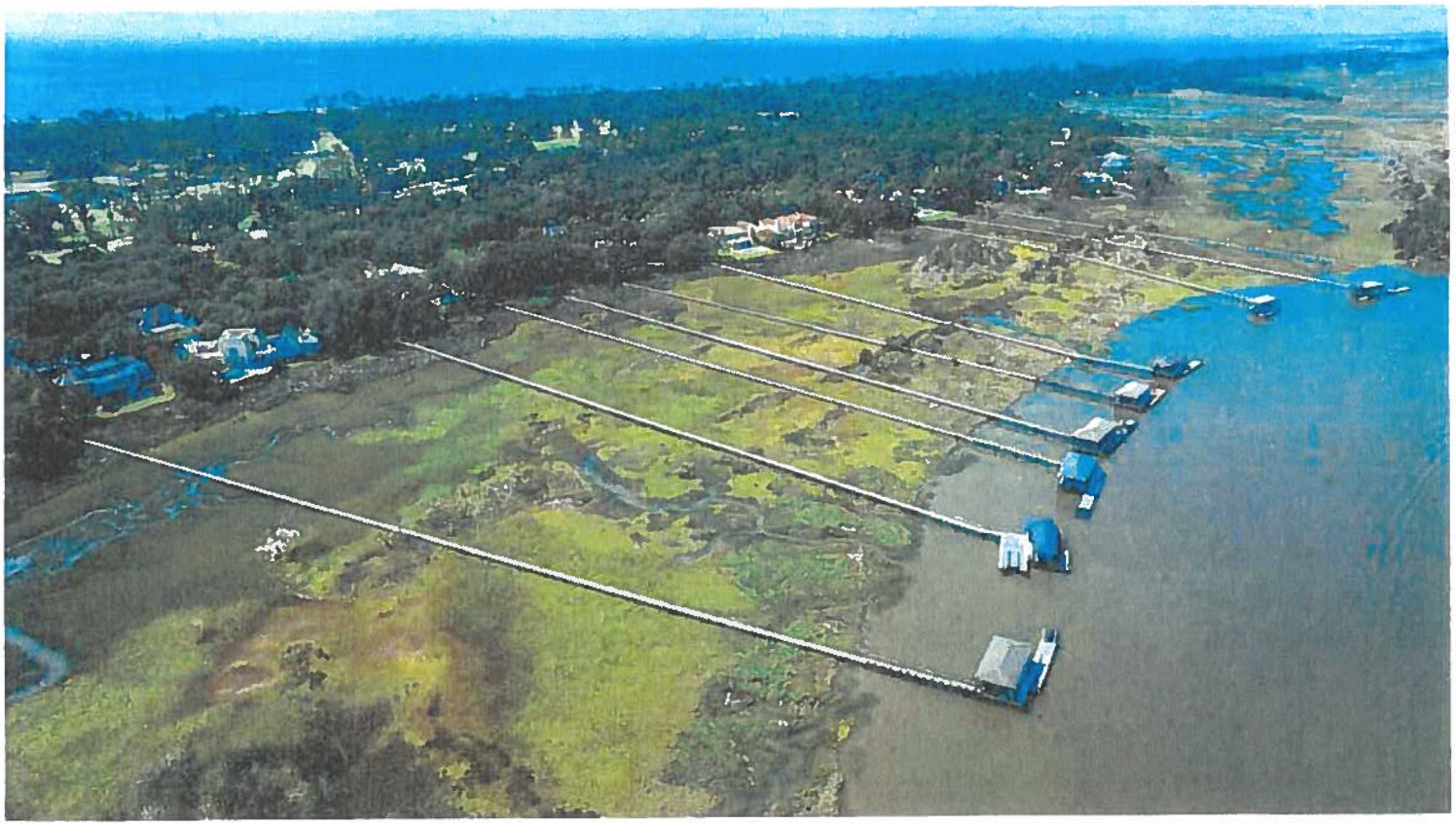
Environmental groups challenge Georgia's plan for larger private docks in the public saltmarsh.




by **Mary Landers** and **Maggie Lee**

July 21st, 2026

Why you can trust The Current



Docks extend across the marsh on Sea Island on June 17, 2026. Proposed changes to state dock regulations would allow private docks up to 6 feet wide and 1,100 feet long. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

Margaret and William Sovey bought their marshfront property on Sea Island more than a quarter

century ago, enthralled by its view of unspoiled saltmarsh.

These days, they have to crane their necks just so to preserve that vista. On a recent hot, sunny morning, Margaret Sovey, 84, stood near a bank of windows to demonstrate.

"I sit at the kitchen table, and I just look straight out. I don't look this way anymore," Margaret said, pointing south toward half a dozen over-700-foot-long dock walkways that slice through a raft of green marsh grass to Village Creek.

"And you know, my blood pressure goes up every morning when I look out that window, and I see these docks and boat houses. It just galls me to have to look at this, and have this little bit of waterway left," said the German-born Margaret, who along with her husband, a native of Hartwell and a Georgia Tech alumnus, moved into their custom-built house in 1996.

"And then these people contacted us and wanted to build a dock as well,' she said, referring to her next-door neighbors. "Now that would go right smack in the middle of that little bit of water that we can still look at and see little boats go by and all of that."



Margaret Sovey stands in her backyard on Sea Island on June 17, 2026. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

That next dock could be even more obtrusive than the existing ones. Georgia officials have proposed new regulations for private recreational docks in Coastal Georgia that, if approved, could double the size of dock walkways, by allowing them to be 6 feet wide and cover more than a tenth of an acre of marsh.

And that's just one of the changes the **new regulations** would allow. The public can comment on those regulations until July 24. The DNR Board of Directors is expected to vote on the regulations at its August 25 meeting.

How we got here

The Coastal Resources Division of DNR regulates **private recreational docks** via a revocable license for use of state-owned tidal water bottoms. Property owners with enough marsh-front property qualify

to apply.

Still, it's unclear exactly how many docks exist in Coastal Georgia, how big they are and how they affect the marsh and its plant and animal species.



The DNR's online dock permit database doesn't reflect actual structures, only relatively recent permits. Between the Isle of Hope and the mainland in Chatham County, gray pins mark known permits. Some properties may have multiple permits, some permits may exist but aren't in the database.

The DNR has tried to inventory coastal docks, but its list of about 4,100 dock permits is not a reliable

guide to where docks actually exist or how much of the marsh private docks cover. Records are patchy for docks permitted before 2013, the year the agency modernized its recordkeeping in a **new database**. Permits from before that year usually haven't made it into the new system unless an owner has since requested a modification that triggered updated record-keeping.

Even for post-2013 permits, the database doesn't reflect events on the ground, like docks swept away in storms and never replaced, or homeowners who got a permit but never actually built the dock. Homes old enough to have had several owners can have multiple dock permits in the system, one for each owner there who's ever gotten one.



Docks extend across the marsh on Sea Island on June 17, 2026. Proposed changes to state dock regulations would allow private recreational docks up to 6 feet wide and 1,100 feet long. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

And some of the records that do exist are incomplete or ambiguous: About 12% of the records don't list a maximum allowed dock length.

The agency itself cautions database users that due to the way records were kept in the past, land use and marsh impacts from docks are "**nearly impossible to quantify.**"

HOW TO COMMENT

Written public comments will be accepted through July 24, 2026. Mailed comments must be postmarked by July 24, and emailed comments will be accepted until 4:30 p.m. on that date.

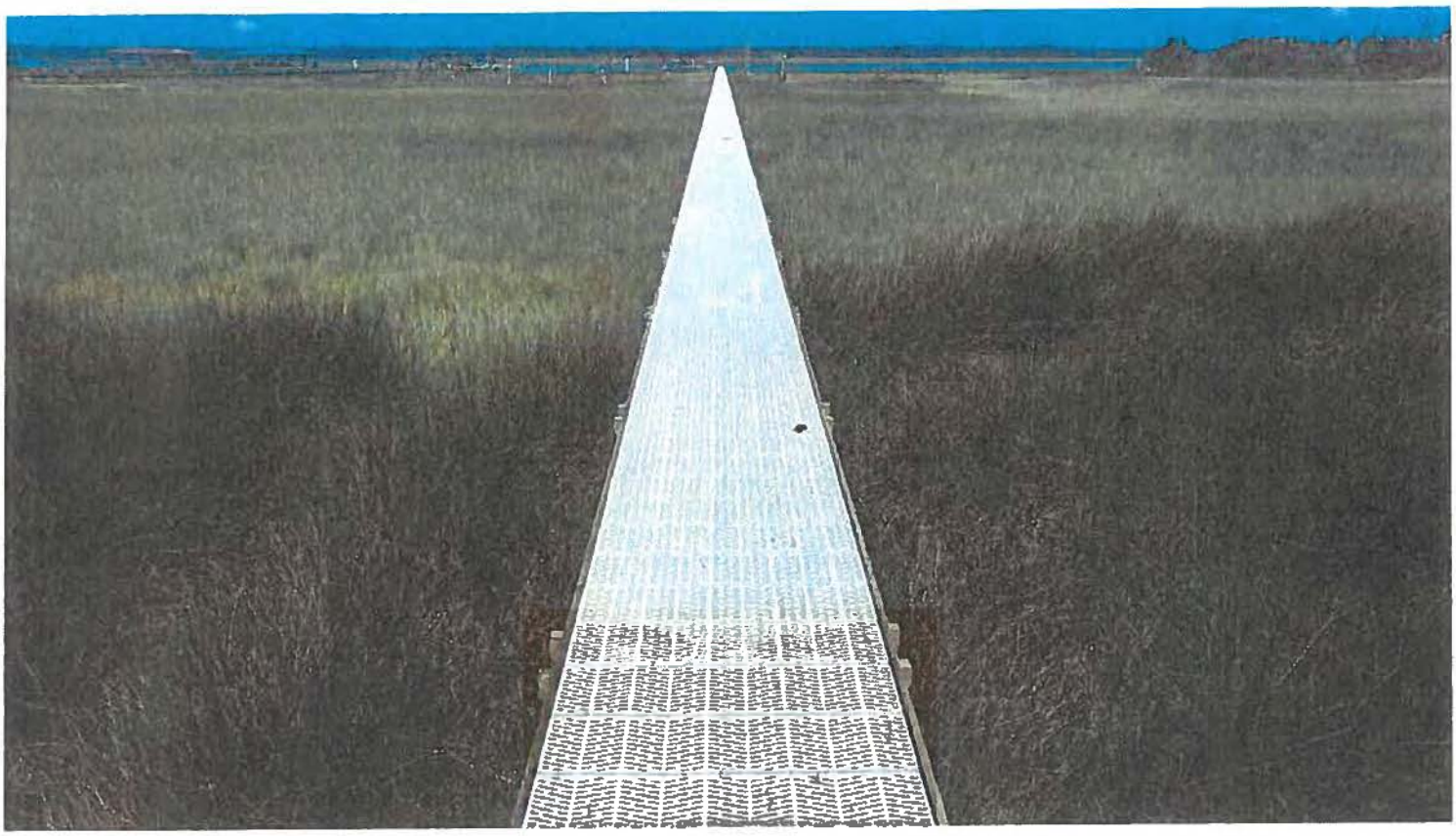
Comments may be submitted to: Jill Andrews, Coastal Resources Division, One Conservation Way, Brunswick, GA 31520. Email: **crd.comments@dnr.ga.gov**

The process of obtaining a license has evolved over time. The U.S. Army Corps of Engineers used to have size and location standards for these docks. As of 2022, however, the Corps requires only that these docks do not impede navigation. In the absence of specific standards from the Corps, the Coastal Resources Division adopted a written policy to guide how it would continue to issue or deny revocable licenses for private docks based on former Corps standards and a decades-long practice. If adopted, the proposed regulations will formalize these guidance policies about the size, placement, and approval of private recreational docks in the coastal marshland.

Golf cart access, bigger impacts

The draft regulations allow dock walkways to be up to 1,000 feet long, or up to 1,100 with a variance. That's in line with the current practice of 1,000 feet. But current practice also limits total area to 3,000 square feet, meaning longer docks have had to be narrower. With the draft proposal, the total area limit is gone and walkways can be up to 6 feet wide. That expands the allowable footprint of the walkway from 3,000 square feet to 6,600 square feet.

Some dock owners argue the added width is needed to provide access to golf carts. Conservation leaders, including two who participated in stakeholder meetings to hash out the regulations, oppose the wider docks as harmful to the local environment, and an unnecessary further privatization of the publicly owned saltmarsh.



A three-foot-wide dock extends across the marsh on Sea Island on June 17, 2026. Proposed changes to state dock regulations would allow private recreational docks up to 6 feet wide and 1,100 feet long. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

When the draft regulations were presented at the June DNR meeting, Mike McMillan, a coastal dock owner, told commissioners that the typical four-foot or less wide dock was not enough. His elderly parents couldn't walk the length of the dock and it's too narrow for a golf cart. Children and dogs have slipped off the walkway into the marsh.

"My parents were not able to get out to the boat," said McMillan, a member of the stakeholder committee that helped formulate the proposed regulations. "(They) were not able to enjoy the grandkids."

"So at the end of the day, I think being able to go six feet, being able to allow us to have a golf cart to get people out there, to get people off the bikes and crazy ways to get out there is helpful for everybody," he said.

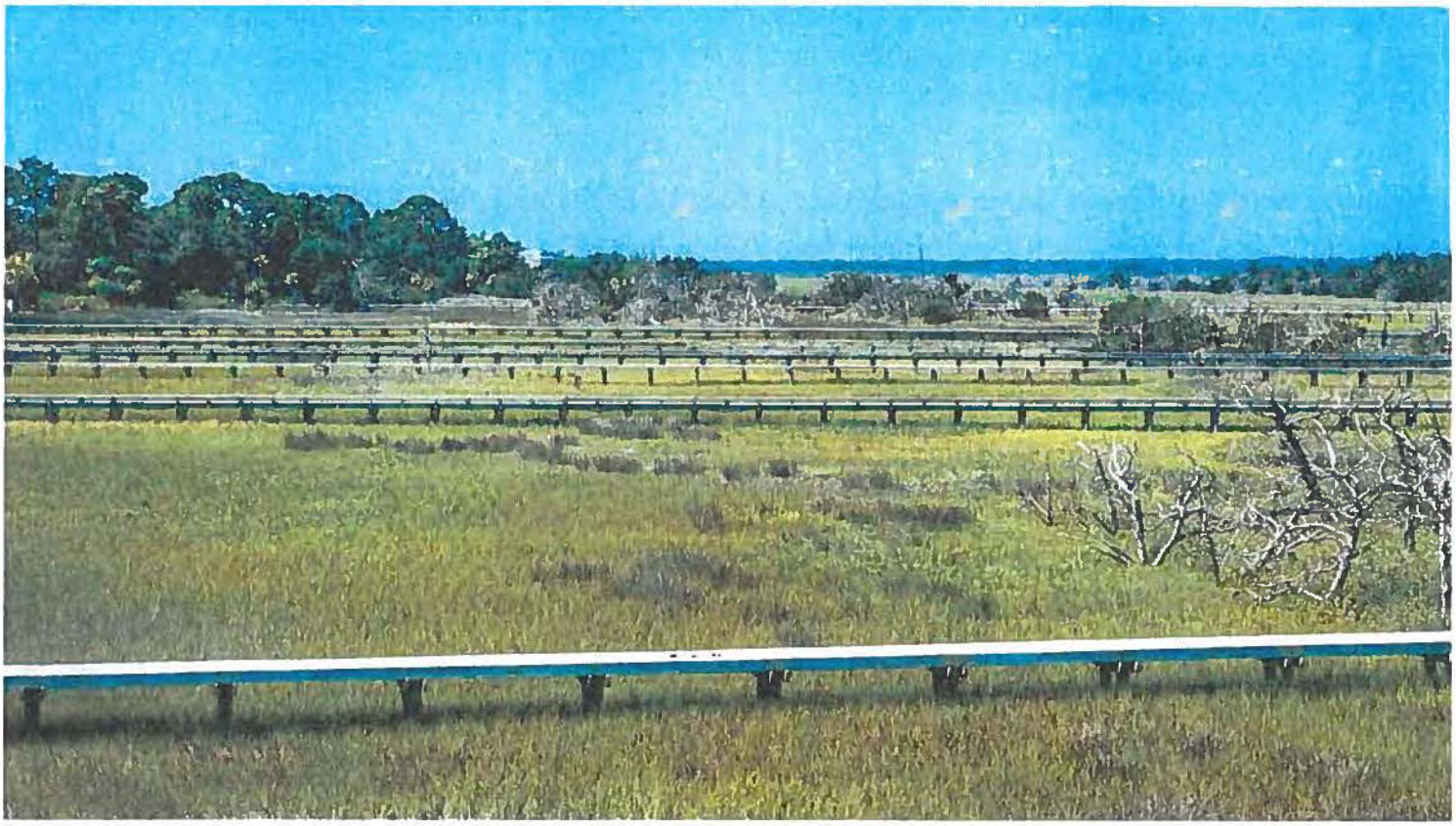
DNR Board Member Bill Jones, who lives on St. Simons, made a similar point at a DNR coastal committee meeting in May.

"If it's six feet wide, that allows a golf cart plus one foot on either side for safety, and that allows the mobility-impaired to access the end of the dock," he said.

Because the docks under consideration are private, only the mobility impaired who own the dock or are invited by the owners can access them. Public docks are more likely to be accessible by design. But even those aren't required to have walkways that accommodate golf carts. **Accessible boating standards of the Americans with Disabilities Act** specify walkways be at least 3 feet wide to accommodate wheelchairs.

Conservationists point to the negative effects of bigger docks over the state-owned marsh.

"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," Courtney Reich, Coastal Director of the Georgia Conservancy, wrote in a July 13 **comment letter** to the state.



Docks extend across the marsh on Sea Island on June 17, 2026. Proposed changes to state dock regulations would allow private docks up to 6 feet wide and 1,100 feet long. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

Reich was referring to **a series of studies** undertaken by Clark Alexander at the UGA Skidaway Institute of Oceanography beginning in 2004. His research, which he presented to the stakeholder group, included findings of 56% sparser vegetation under docks compared to adjacent areas. The researchers noted that this "density reduction represents a potentially important and previously unquantified term in the carbon budget of the marsh, which provides food and critical habitat for many commercially important species."

Alexander and his team also found that docks affect how dead marsh grass – wrack – accumulates in the marsh. "...(D)ock-associated wrack accumulation on the marsh may be equal to, if not more, significant than that of private recreational dock shading," they wrote in a 2008 report.

In June, Alton Brown, senior principal with Resource + Land Consultants, presented to the DNR board what he sees as the minimal impact of docks on the marsh as a whole. His company used GIS systems to estimate the number of docks on the coast and how much marsh they cover.

In total, he estimated the coastal counties' docks cover about 91 acres, or less than 0.02% of the state's 368,000 acres of coastal marshland.

"So then I looked at what would it be if every remaining parcel builds a private dock? Of course, we don't know the length that those docks will be, so I just arbitrarily picked an average of 500 feet, and it would be about 0.1%."

Brown, whose business helps guide land owners through the process with CRD, emphasized the positives. Docks aren't causeways, after all, he said.

"Underneath these elevated walkways, you know, you still have the functions," he said. "You have the semi-diurnal tides. You still have all of the fish and macro species occurring. You do have, as some science studies have shown, some loss of vegetation, but it's only about a small percentage."

Research f ndings

Alice Keyes, senior conservation strategist at the advocacy nonprofit One Hundred Miles and a member of the stakeholder committee, points to docks' impact on biodiversity and aesthetics, especially in localized areas.



One Hundred Miles Senior Conservation Strategist Alice Keyes in Brunswick on June 17, 2026. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

"What the Coastal Resources Division has incorporated is enabling ultimately a small group of people to have a major impact on our public marshlands at the public's expense for their own private benefit. So these big six-foot (wide) docks that could be 1,000 feet long are going to fragment our marsh," Keyes told *The Current GA*. "They're going to reduce the biodiversity in our marshlands. They're going to affect the health of the marsh, and they're going to affect the neighbors' viewshed and quality of the experience in the place, all for their own individual benefit, and so those are public assets that the CRD needs to consider."

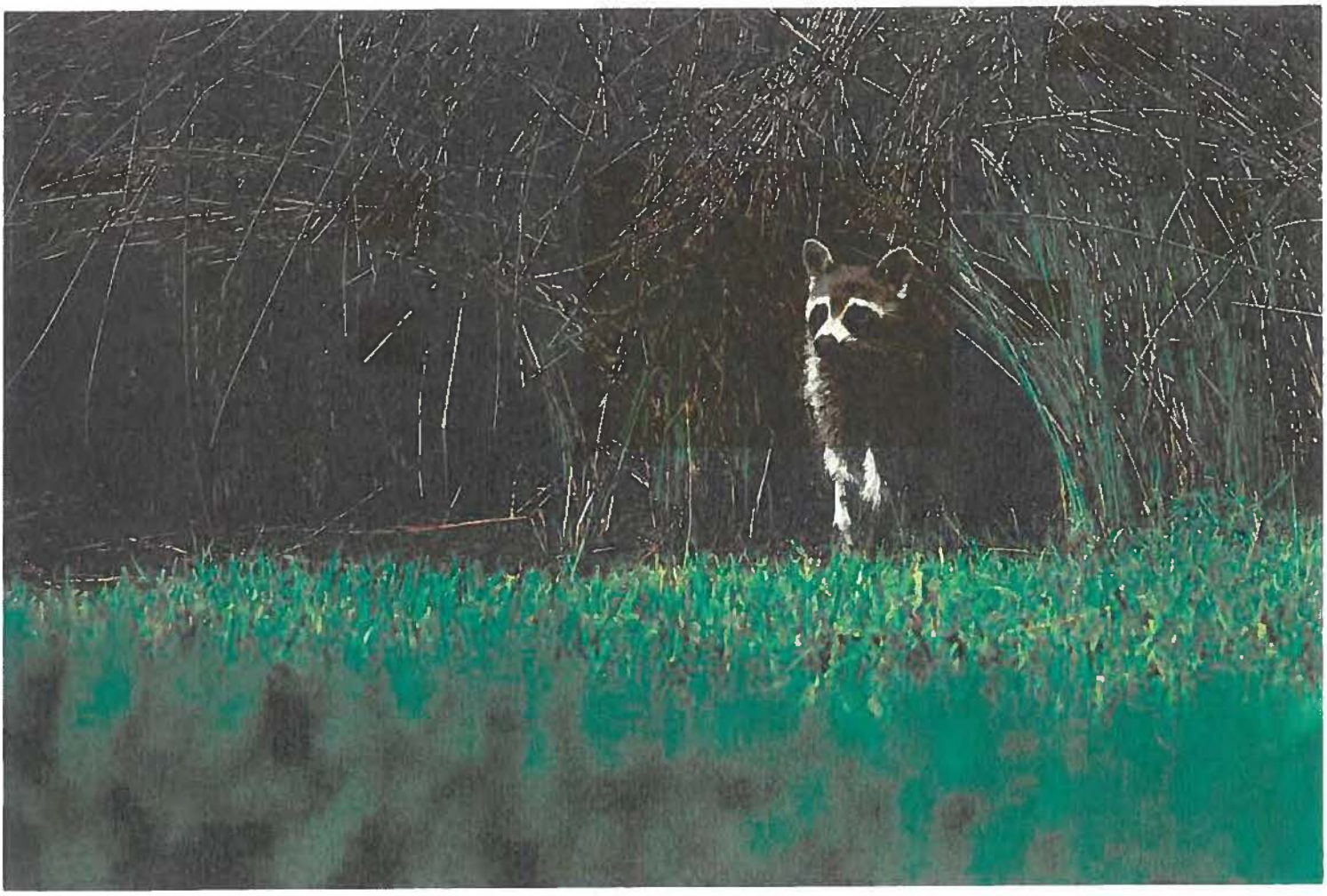
A 2009 study in Maryland looked at the effect of docks longer than about 100 feet on the abundance and diversity of marsh birds as a way to assess ecological integrity. They found a drop in both the abundance and diversity of bird species that rely exclusively on the saltmarsh.

"Reducing or eliminating long piers would reduce human disturbance and contribute to less

fragmented, more expansive marsh habitat," the authors wrote in *The Journal of Wildlife Management*.

Wildlife managers at DNR agreed that bird species in Georgia that depend on intact expanses of saltmarsh, including saltmarsh sparrows, clapper rails and whimbrels, are likely to be driven from an area with many docks.

"It is clear that beyond a certain limit of docks in a given saltmarsh area, the effects of fragmentation reduce habitat quality and likely extirpate species locally," then-program manager Jason Lee wrote to Keyes in 2024.



A raccoon emerges from the marsh on Sea Island on June 17, 2026. Credit: Justin Taylor/The Current GA/CatchLight/Report for America

Acreage limit surpassed

The Georgia Conservancy also notes as a major concern that the new standard will allow docks to

impact over 0.1 acres of marsh, a threshold that requires mitigation for other wetlands.

"This exceeds the 1/10th acre threshold that the U.S. Army Corps of Engineers uses to trigger compensatory mitigation requirements for jurisdictional wetland impacts," their comment letter reads. "If this level of impact is significant for freshwater wetlands, then why would the same not be true for salt marshes?"

That 0.1 acres of impact also exceeds the legal definition of "minor alteration" of marshlands written into Georgia's Coastal Marshlands Protection Act, setting up a conflict between the law and the regulations.

Jeff Beauvais, of One Hundred Miles, warns about possible loopholes in the regulation's use of the terms "serviceable" and "reconstruction." North Coast Advocate Beauvais is not an attorney, but found the regulation's language "sloppy."

The proposed regulations state: "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."

Beauvais worries about what will qualify as "unserviceable."

"If I want to drive a golf cart down my dock and I can't currently because it's too narrow, is that not usable?" he told *The Current*. "Is DNR going to argue that that counts as not usable and therefore not serviceable?"

Back on Sea Island, the possibility of even larger docks blocking her view disheartens Margaret Sovey.

"I'm almost glad I'm as old as I am because I don't have that much time left. But if I had another 20-30 years that I would want to be here, I don't know if I would stay," she said. "I'm so aggravated about what has happened and how this area has been changed, and certainly not for the better."

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https://thebrunswicknews.com/news/local_news/proposed-dock-rule-revisions-expand-marsh-coverage-and-shading-irking-environmentalists/article_daee0fc6-8e21-47cc-aa87-67cc89572e62.html

Proposed dock rule revisions expand marsh coverage and shading, irking environmentalists

By MICHAEL HALL mhall@thebrunswicknews.com
Aug 26, 2026



Docks cross over the marsh and into the Back River off of Riverside Drive in Brunswick.

Provided photo

Private docks along Georgia's coast could cover and shade more than 9,000 square feet of marsh if a revised version of a proposed rule is passed by the state Board of Natural Resources.

The new rules that allow for docks up to 6-feet wide and 1,500-feet long are a common sense approach that makes gangways across longer stretches of marsh accessible for disabled and elderly people, supporters of the revised rule said during a board meeting in Atlanta on Tuesday.

The rules also allow for larger multi-family docks, which may encourage people to share them instead of building individual docks on each property, supporters said.



But docks that cover 9,000 square feet of marsh or more with variances will degrade and fragment more sensitive marsh habitat, environmental advocates and opponents to the new rule said. The rules ignore sound science and favor a few wealthy property owners over what is best for the publicly owned marshes for which Georgia's coast is known, they said.

Jill Andrews, coastal management chief for DNR's Coastal Resources Division, presented the revised rules to the board, noting that this is the latest attempt to

codify private dock-building regulations in a process that began in 2024. Folks wanting to build new docks or renovate them have been required to obtain both federal permits and state-issued revocable licenses since the expiration of a Federal Programmatic General Permit in 2022, through which the U.S. Army Corps of Engineers used to enforce location and size standards.

The proposed rules would codify standards that have been used in an interim operating framework, the DNR has said.

The proposal presented Tuesday was revised after a July public comment period in which the DNR received 125 comments. Those comments almost all agreed that the rules were necessary to govern when, where and how people can build docks over coastal marshlands.

Commenters did not always agree on the other details, Andrews said.

The new revisions extend the potential length of a dock to 1,500-feet long and allow the gangways to get to the end of the dock to be 6-feet wide. In that span, as they were presented on Tuesday, the gangways could cross over creeks wider than 20 feet, which was formerly prohibited.

The new rules allow up to four families to share a private dock and allow such docks to be as large as 600 square feet where the dock hangs over the water after crossing marsh.

Minor maintenance under the proposed rule, such as replacing deck boards or screws, would not require notification or a new revocable license. Major maintenance, replacing pilings or structural components using cranes, would.

The new proposal also removes a 10% variance limit, among other things.

The removal of the variance limit and the extension to 1,500-feet for gangways will allow for excessively long docks that threaten the sensitive marshes protected by the state's Coastal Marshlands Protection Act, said Alice Keyes, chief conservation strategist for the advocacy group One Hundred Miles. At the maximum length and width, a dock would cover the same amount of space as an eight-bedroom home, two of Savannah's city squares and 60 parked cars, she said.

"Fifteen-hundred feet is also equivalent to the height of one and a half Eiffel Towers and is longer than the Sears or Willis Tower is tall," Keyes said during her public comments to the board.

The proposed rules double what the Marshlands Protection Act defines as a minor alteration to the marsh, she said.

She noted that of the 112 comments submitted about the proposal and posted online by CRD, 92 requested stronger limits to the allowable size of docks, 14 asked

for the elimination of long docks altogether and five supported the rules.



One Hundred Miles supports codifying rules to govern private docks along Georgia's coast, but it wants those rules to be based on what is best for the public marshes that are owned by all Georgians and not on what is best for wealthy people or people who stand to profit from the new rules, Keyes said.

The DNR also lacks reliable data on existing docks and their impacts, she said.

"Our state must get back to the practice of having data and science, not wealth, guiding our decision-making," Keyes said.

Courtney Reich of the Georgia Conservancy said the new revision strays far from the DNR's previous focus to protect marshes.

"In the lack of scientific foundation, we found it difficult to understand why these changes were actually made in the form you're looking at," she told the board.

Carolyn Rader of the Center for a Sustainable Coast reminded the board that the marshes are not privately owned. They are publicly owned and provide a valuable ecological and environmental resource that benefits everyone.

"We are known worldwide for our marshes," she said. "... You all are here to entrust the safety of the marsh. That's what your job is. You're not here to provide recreation."

Supporters of the revision include McIntosh County Commissioner Davis Poole, who serves on the Marsh and Shore Protection Committee. The new maintenance rules make sense to allow people to repair their docks within reason without having to get a new license, Poole said.

Docks that are 1,500 feet long will cost so much that very few people will follow through on it, he said.

"I think this will sort of self maintain itself," Poole said.

He also said new multiple family dock rules will encourage fewer docks to be built and that stronger lighting rules will be good for protected sea turtles.

After some discussion about enforcement, variances and creek crossings, Bill Jones of St. Simons Island, who serves on the DNR's coastal committee, made a motion to have a 10% variance limit on the 1,500-foot gangway length put back into the rule and to not allow gangways to cross creeks wider than 20 feet.

The motion passed.

Doug Haymans, director of the Coastal Resources Division, said his staff plans to come back in October with a final rule for private docks that is voted on and approved.

The proposed rule with revisions made after Tuesday's meeting will go back out for public comment prior to the October meeting.



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Michae

Patrick, Diana

From: Jenny Watkins <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 9:37 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Jenny Watkins
[redacted]

Patrick, Diana

From: KATHRYN PROPST <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 9:44 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

As a former (and hopefully returnting) resident of coastal Georgia, I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross. This is just wrong.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
KATHRYN PROPST
[redacted]

Patrick, Diana

From: Lesley Lochridge <[redacted]>
Sent: Wednesday, September 30, 2026 10:02 AM
To: Comments, CRD
Subject: RE: Proposed rules for private 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.

Attn: Jill Andrews

I urge the DNR to maintain the current practice limiting the size of private recreational docks that are located over state-owned tidal water bottoms, and to adopt stronger regulations governing their construction and maintenance. Georgia's new private recreational dock rule diverges greatly from what is now practiced: it proposes to triple the dock size stipulated in currently established state standards; the proposed allowable size also far exceeds the standards in neighboring states.

The State of Georgia owns the beds of navigable streams and tidal waters; in other words, the marsh belongs to the people - no private individual owns it. It is public land held in trust, and any encroachment on it must be carefully considered.
The long-standing Coastal Marshlands Protection Act is a significant piece of statewide conservation legislation, declaring marshlands a vital natural resource system. Docks can break up this otherwise intact vital system, a habitat for threatened and endangered species. Studies have shown a decline in diversity and numbers of bird species within a 50-foot buffer of a dock constructed in the marsh. In addition, as storms become more frequent and severe, poorly built or maintained docks are breaking apart, leaving marine debris in our marshes. Currently, dock owners bear no responsibility for cleaning up the debris; that burden rests on the State and Georgia taxpayers.
Georgia's recently updated State Wildlife Action Plan (SWAP), created by the Georgia DNR, identifies salt marsh as critical habitat and lists many marsh birds as threatened by habitat loss and sea level rise.
Our marshes are vast, healthy, and beautiful because of decades of protection, not because they were left to chance. Relaxing the standards now risks undermining the very thing that makes our coast special.
Again, please maintain the dock size limit currently in place, and adopt stronger protections governing dock building and maintenance, in order to preserve the ecological, scenic, and public value of our coastal marshlands now and for future generations.

Thank you.

Lesley Lochridge
Georgia Resident

Patrick, Diana

From: Shelley Renner <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 10:06 AM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Shelley Renner
[redacted]

Patrick, Diana

From: Katherine Brokaw <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 10:18 AM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am a resident of Atlanta who often visits the coast, with its unique and beautiful natural landscape. I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. Once spoiled, this special environment will be lost forever, and for what? Recreational private boats? I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Katherine Brokaw
[redacted]

Patrick, Diana

From: Mark Dickerson <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 10:35 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Mark Dickerson
[redacted]

Patrick, Diana

From: [redacted]
Sent: Wednesday, September 30, 2026 10:45 AM
To: Comments, CRD
Subject: Proposed 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.

Dear Ms. Andrews,

I am writing to ask for your leadership when handling the final steps of considering/recommending rules for long docks.

This is a moment when I hope you will choose integrity over special interests.

I hope you will recommend rules that reflect what we know scientifically about the danger long docks pose to the health of Georgia's iconic salt marsh.

I hope you will serve the public's interests by honoring the recommendations of the 12 member stakeholder group and reject the push by a wealthy few.

Anything less will reflect a broken system and a personal and professional failure on your part.

Please do what you know is right.

Sincerely,

David D. Weitnauer
[redacted]

Patrick, Diana

From: Johnnie Crosby <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 10:58 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Johnnie Crosby
[redacted]

Patrick, Diana

From: evora fan <[redacted]>
Sent: Wednesday, September 30, 2026 11:21 AM
To: Comments, CRD
Subject: Proposed 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.

To Whom it May Concern:

Regarding the proposed dock building regulations, it seems the concerns of many are being ignored to benefit a few wealthy landowners.

We are playing with environmental fire here. The health of the salt marshes and rivers is of monumental importance to the natural vitality and beauty of coastal Georgia.

I am sadly reminded of the response of one of the officials who secretly orchestrated the data center in Effingham County. When asked why the public wasn't given input, he answered that they would have been against it.

We can do better for the quality of life for the majority and for the essential natural world.

Sincerely,
Sharon Bordeaux

Patrick, Diana

From: SHARON STEELE <[redacted]>
Sent: Wednesday, September 30, 2026 11:23 AM
To: Comments, CRD
Subject: Cumberland Island

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.

This email is to voice my concerns about the Cumberland Island proposed changes. I strongly desire no changes to be made to this beautiful wildlife island.
Sharon Steele
Sent from my iPhone

Patrick, Diana

From: Sharon Kitchen <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 11:25 AM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Sharon Kitchen
[redacted]

Patrick, Diana

From: Joshua Soave <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 12:36 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks. Whenever we go to Tybee Island or Georgia's other barrier islands, the marshes are a shared resource for the community to fish, kayak, or for recreation. Also, there are wildlife and plants that live in the marsh. Larger docks could negatively impact these.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Joshua Soave
[redacted]

Patrick, Diana

From: Catherine Stortz <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 12:41 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Catherine Stortz
[redacted]

Patrick, Diana

From: Arlene Watson <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 12:59 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Arlene Watson
[redacted]

Patrick, Diana

From: Talia Levine <talia.levine@TNC.ORG>
Sent: Wednesday, September 30, 2026 1:00 PM
To: Comments, CRD
Cc: Jason Lee
Subject: TNC GA Comments on Subject 391-2-1
Attachments: The Nature Conservancy in Georgia Comments on Subject 391-2-1.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 find attached The Nature Conservancy in Georgia's comments on Subject 391-2-1.

Best,

Talia Levine
Freshwater Restoration Specialist
talia.levine@tnc.org
706.250.6439

nature.org

The Nature Conservancy

The Nature Conservancy

The Nature Conservancy in Georgia
270 Peachtree St NW, Ste 1040
Atlanta, GA 30303

404.873.6946
Nature.org/Georgia

September 30, 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). The Nature Conservancy of Georgia is a nonprofit science-based organization dedicated to conserving the lands and waters on which all life depends. Since 1969, TNC has worked alongside the Department of Natural Resources (DNR) and other partners—such as the Department of Defense, USFWS, NOAA, environmental organizations, and communities—to better manage Georgia's natural resources and has been instrumental in some of the Georgia coast's greatest conservation achievements, including the original passage of the Coastal Marsh Protection Act (CMPA) while Jane Hurt Yarn, TNC Board member, served as chairman of the Georgia Coastal Islands Committee. In addition, TNC assisted or led in the protection of many conservation areas in coastal Georgia including the islands of Little Tybee, Wassaw, Ossabaw, Egg, and Cumberland among others. TNC participated in the 2025 DNR State Wildlife Action Plan (SWAP) development that resulted in the designation of Georgia's saltmarsh and many of its species as SWAP priorities. TNC serves on the Georgia DNR's Coastal Advisory Council (DNR CAC) which provides technical guidance and policy recommendations on resource management, including advising the Coastal Management Program. TNC collaborates with DNR and other partners to develop and implement the Georgia Oyster Resiliency Initiative. TNC also partners with DNR on living shoreline policies and restoration efforts that support the long-term health of coastal ecosystems.

While TNC supports efforts to clarify and modernize dock regulations, we oppose adoption of the current proposal because it would significantly expand allowable impacts to Georgia's tidal marshes without adequate scientific analysis, assessment of cumulative impacts, or a clear and transparent public review process. To that effect, we reintroduce the joint comments for the June 2026 proposal, delivered by the One Hundred Miles, attached, as they are still pertinent to our concerns in this new proposal. Furthermore, we are concerned that the rule-drafting process has not provided a level of public engagement and transparency of process and information commensurate with the significance and potential impacts of the proposed changes. Underpinning these concerns, the Public Trust Doctrine is a foundational legal principle in Georgia under which the State holds title to tidal and navigable waters and the lands beneath them in trust for the public. The doctrine helps ensure public access to these critical resources and establishes the State's obligation to

protect and manage its coastal resources for the benefit of the citizens of Georgia and the United States.

Of utmost concern is the absence of analysis addressing a substantial body of scientific research demonstrating that increased dock density and shading can negatively affect salt marsh structure, function, and associated wildlife communities (Alexander 2006, Alexander 2012). The proposed allowable dock footprint appears to exceed by a substantial margin the scale of alteration that the CMPA characterizes as a minor alteration of the marsh. According to the CMPA, minor alterations are "not to exceed 1/10 acre," but the recently proposed allows for 9,000 square feet, which is more than twice the 1/10 acre. Additionally, a Variance Process allows up to 10% of the maximum lengths, or 1,650-foot walkways (totaling 9,900 square feet or 0.23 acres), raising important questions regarding consistency with both the intent and implementation of the Act. With these issues of concern, TNC requests a public process that is befitting this potential significant impact.

For the DNR Board to objectively proceed and fulfill its job of managing this critical coastal resource, several data points are necessary for understanding the impact of this regulatory decision affecting this SWAP priority.

- An inventory of existing private docks and their cumulative footprint within Georgia's salt marsh ecosystem.
- An analysis of the number of currently ineligible lots that would become eligible for docks under the proposed rules because they are located between 1000 and 1650 feet from a navigable creek, including the estimated acreage of the resulting development footprint, the footprint of associated ecological impacts, and the potential cumulative impacts of the proposed increases in allowable dock length and width proposed in the new rules.
- An assessment of the number and extent of large, intact marsh tracts that could become accessible to and bisected by docks under the proposed rules.
- The current and potential proportion of dock-related impacts to individual marsh islands, including the percentage of each island currently affected by docks and the additional percentage that could be affected if the proposed rules are fully implemented.
- An evaluation of the anticipated ecological impacts associated with the potential build out, including the extent of habitat loss or disturbance and potential displacement of priority wildlife species, such as marsh-dependent birds (Hunter 2016, Alexander 2008) identified in the 2025 SWAP.
- Input from DNR biologists with expertise in coastal species regarding the proposed changes and their potential implications for coastal wildlife and habitats.
- Consideration of how sea level rise may compound the ecological impacts of increased dock shading on tidal marshes, including potential effects on marsh health, resilience, and migration (Runion et al. 2024).

We believe these questions are best addressed by objective subject matter experts who do not stand to benefit from revising the current restrictions. Again, the public process of decision-making is critical to assure trust, and we ask that the DNR CAC, as well as the Coastal Marsh Protection Committee and the affected public, be provided with the scientific and management information used to develop the current proposal and be allowed reasonable time to review and contribute to discussions of management practices and to provide recommendations to the DNR.

TNC urges the DNR Board to abide by both the spirit and the letter of the CMPA. The management of Georgia's saltmarshes—among the state's most valuable and globally significant natural resources, recognized for their productivity, biodiversity, and ecological and cultural importance—warrants careful and thoughtful consideration. Although the 2003 CMPA exemption for private

docks was intended to facilitate public access to fishing and enjoyment of Georgia's coastal resources, that access should not come at the expense of the very resources the exemption was intended to help people enjoy. A proliferation of docks could significantly alter the ecological function, character, and appearance of the salt marshes so famously celebrated in Sidney Lanier's poetry. The CMPA definition of minor alteration, 1/10 of an acre, makes that abundantly clear. At a time when sea-level rise, shoreline development, and habitat fragmentation are placing increasing pressure on Georgia's coastal ecosystems, regulatory decisions should reinforce, rather than diminish, the conservation principles that have guided implementation of the CMPA for decades.

TNC respectfully requests that the Board reject the proposed rule, direct DNR staff to conduct a comprehensive science-based assessment of ecological and cumulative impacts, solicit input from agency scientists and advisory committees, and provide additional opportunities for public review before advancing any amendment. TNC looks forward to working together to continue the legacy of stewardship of our healthy and treasured Georgia Coast.

Sincerely,

Monica Thornton
State Director, Georgia

References

Alexander, C. and M. Robinson. 2006. Quantifying the Ecological Significance of Marsh Shading: The Impact of Private Recreational Docks in Coastal Georgia. Report to the Georgia Coastal Zone Management Program, Georgia Department of Natural Resources, Coastal Resources Division, Brunswick, GA. 47 p.

Alexander, C. 2012. Field Assessment and Simulation of shading from Alternative Dock Construction Materials. Final NOAA Report.

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Banning, A. E., J. L. Bowman and B.L. Bruce. 2009. Effects of Long Piers on Birds in Tidal Wetlands. Journal of Wildlife Management, 73(8) pp. 1362-1367.

Hunter, E. 2016. Vulnerability of salt marsh bird populations to sea level rise. Dissertation, UGA.

Runion. K. D., M. Alber, D. R. Mishra, and J. L. O'Connell. 2024. Early warning signs of salt marsh drowning indicated by widespread vulnerability from declining belowground plant biomass.

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

7 Glynn Avenue
Brunswick, GA 31520
www.OneHundredMiles.org
912.264.4111

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 inches[5]). 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.

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[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.

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[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.

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[9] DNR Board Coastal Committee Meeting, May 2026: https://dnr.box.com/s/ceriqe2sbsx5h4j4jtt47b39ixt6eiqu

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

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[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: Ann Pequigney <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 1:13 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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 do not allow this draft rule that triples the current allowance.

Georgia's salt marshes are pristine and healthy because our state has spent more than 55 years protecting them. All I'm asking is for common sense rules that will continue to hold this vital and iconic resource in trust for *all* our people—not parcel it up for private use by the wealthy.

I urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Ann Pequigney
[redacted]

Patrick, Diana

From: Jessica Howell-Edwards <[redacted]>
Sent: Wednesday, September 30, 2026 1:15 PM
To: Comments, CRD
Subject: Personal comment, CRD Proposed Dock Rule - Sept 2026

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,

The current proposed rule would allow private landowners to build docks that are larger than any private docks in the Southeast.

Implementation of the proposed rule will decimate our marshes, negatively impact countless species of flora and fauna, and imperil recreational use of a shared resource.

Currently, there is no complete inventory of existing private docks in Georgia.

There has been no study of what individual and cumulative impacts of such ridiculously long docks may be.

Without this information, I do not understand how the Board can adequately understand how changes to the private dock regulatory framework will impact the very public trust marsh resources it is charged with protecting.

I completely oppose the current proposed rule and urge the Board to listen to its constituents; please stop pandering to the interests of a few and instead look out for the resources you are authorized to protect.

Jessica Howell-Edwards
Decatur GA 30033

Patrick, Diana

From: Derek Brown <[redacted]>
Sent: Wednesday, September 30, 2026 1:16 PM
To: Comments, CRD
Subject: Proposed dock corridor

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 wish to submit in favor of the Dock length proposal. Docks make good habitat for organisms on the pilings, crabs and food chain. Birds like to roost and hang out on the docks. The argument against the wrack I feel that stuff washes away, rots and the grass returns. I have seen that after hurricane Helene killed a large section,but now it is fully grown back strong.
So if a property owner wants to build a very long dock, more power to them, they help the ecosystem. It may be unsightly to their neighbors, but that's just jealousy.

Kind Regards-Derek Brown

Patrick, Diana

From: Jessica Howell-Edwards <jessica@wildcumberland.org>

Sent: Wednesday, September 30, 2026 1:24 PM
To: Comments, CRD
Cc: Dani Purvis
Subject: GADNR/CRD Proposed Recreational Dock Rule

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.

Wild Cumberland is a volunteer-led nonprofit organization that strives to protect Cumberland Island and its Wilderness. We appreciate the opportunity to comment on this proposed rule.

As written, the proposed rules depart from long-standing, science-based standards, create significant ambiguity in the management of public marshlands and tidal waters, and authorize private structures at a scale that exceeds what has historically been permitted under Georgia's coastal management framework.

The current proposed rule would allow private landowners to build docks that are larger than any private docks in the Southeast.

Implementation of the proposed rule will decimate our marshes, negatively impact countless species of flora and fauna, and imperil recreational use of a shared resource.

Currently, there is no complete inventory of existing private docks in Georgia.

There has been no study of what individual and cumulative impacts of such ridiculously long docks may be.

Without this information, we do not understand how the Board can adequately understand how changes to the private dock regulatory framework will impact the very public trust marsh resources it is charged with protecting.

Wild Cumberland completely opposes the current proposed rule and urges the Board to listen to its constituents and also employ the scientific rigor necessary to ensure the appropriate protections for one of state's most valuable and important shared resources.

Jessica Howell-Edwards
Jessica@wildcumberland.org
DeKalb County, GA

Sent from a device featuring AutoCorrect.

*My odd work hours may not coincide with yours. Please do not feel obligated to reply outside of your typical work schedule.

Patrick, Diana

From: Daniel Jones <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 1:49 PM
To: Comments, CRD
Subject: Pass stronger dock rules to protect our marshes

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,

The proposal to more than tripling the walkable distance of private docks in coastal Georgia reflects a stunning amount of corruption in the process that came to this proposal. The state's own advisory committee proposed doubling the distance, but apparently that wasn't enough for wealthy landowners with political clout, because you are now proposing a nearly 50% percent increase in allowable dock length from even the advisory committee's giant expansion of the current permittable length. If this isn't outright corruption, it certainly is the public perception of this! Please re-consider this outrageous proposal, and at a minimum follow the advisory committee's recommendations, that is why it was formed.

Sincerely,
Daniel Jones
[redacted]

Patrick, Diana

From: Charles Schoen <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 1:52 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Charles Schoen
[redacted]

Patrick, Diana

From: Roderick Jude <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 1:58 PM
To: Comments, CRD
Subject: Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

This is Extremely Important to me and my family here in Georgia !!

Sincerely,
Roderick Jude
[redacted]

Patrick, Diana

From: Holly Panetta-Roy <[redacted]>
Sent: Wednesday, September 30, 2026 2:03 PM
To: Comments, CRD
Subject: Rules 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.

"A 12-member stakeholder group representing homeowners, builders, local officials, environmental organizations, and technical experts spent months meeting and crafting new rules for private recreational docks in Coastal Georgia."

After reading the proposed rules and the existing rules, the only reason I think the existing rules are being questioned is because builders and local officials have decided there is money to be made by extending the docking system. **I totally support limits on the size of docks built over the state-owned salt marsh**. If you give them an inch they'll want a mile. Those are state marshes that need to be protected at all costs. And to say, "Supporters of the unlimited length suggested the cost of building will curb dock size without regulations," is absolutely ridiculous.

"At $450 a foot, cost is going to impact people's decisions on whether they're going to build long docks," Poole told the board. "It gets super expensive super-fast, unless you build it yourself, which is still horribly expensive. So, I think this will sort of self-maintain itself, if you will." The sharks are already in the water. "At $450 a foot, cost is going to impact people's decisions on whether they're going to build long docks," Poole told the board. "It gets super expensive super-fast, unless you build it yourself, which is still horribly expensive. So, I think this will sort of self-maintain itself, if you will."

The above statement is naive at best. This person is speaking as if a little ole homeowner would be building the docks when we all know that will NOT be the case. People/businesses don't care what things cost if they have the money.

Rules and regulations need to stay in place, and the salt marshes need to be protected before they are ruined forever.

--

Holly Roy

[redacted]

Patrick, Diana

From: Erin Cay <[redacted]>
Sent: Wednesday, September 30, 2026 2:04 PM
To: Comments, CRD
Subject: Private Dock Proposed Changes
Attachments: Comment Letter on Docks From Individual.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.

Dear Members of the Georgia Department of Natural Resources Board and Coastal Resources Division:

Thank you for the opportunity to comment on the proposed rules governing private docks in Georgia's state-owned tidal waters.

As a resident of coastal Georgia, I appreciate DNR's effort to establish clear and consistent rules for private docks. Property owners should have reasonable access to our waterways. At the same time, that access must be balanced with our responsibility to protect Georgia's salt marshes and tidal waters, which belong to all Georgians and are held in trust for future generations.

I am concerned that the proposed rules allow private dock walkways to be as much as six feet wide and 1,500 feet long without establishing an overall limit on the amount of public marsh that an individual dock may cover.

The issue is not whether Georgians should be allowed to have private docks. The question is how much of a public natural resource should be occupied by a private structure and what safeguards should be in place.

I respectfully ask DNR to strengthen the proposed rules in several important ways:

- **Establish a meaningful maximum size for private docks.** To comply with the standard established in the Coastal Marshlands Protection Act, the total impact of a private dock over state-owned tidal water bottoms should not exceed 0.10 acre to be considered minor. This would continue to provide flexibility for property owners while limiting the amount of public marsh affected by an individual private dock.
- **Require larger docks or exceptions to be justified by need and science.** Exceptions should not be granted simply because a larger structure is desired. Any departure from established standards should consider impacts such as marsh shading, habitat fragmentation, navigation, water quality, wildlife, viewsheds, and neighboring properties.
- **Clarify the rules for rebuilding and modifying existing docks.** The regulations should not unintentionally create a pathway for older, smaller docks to be expanded to the larger new standards simply because they require repair or reconstruction.
- **Provide meaningful notice and public review when exceptions are requested.** Adjacent property owners and the public should have sufficient information and an opportunity to comment when a proposed dock could have greater impacts on shared waterways and marshlands.
- **Improve oversight and accountability.** Georgia should maintain an accurate database of private docks, consider reasonable application fees to support DNR review and enforcement, and establish professional standards for dock construction.

Georgia's salt marsh is one of our state's greatest natural assets. It protects our communities, supports wildlife and fisheries, and is central to the character and economy of our coast. Once these public marshlands are fragmented or impaired, the consequences can extend well beyond an individual property.

I urge DNR to adopt clear, science-based standards that provide reasonable private water access while keeping protection of Georgia's publicly owned marshes and tidal waterways at the center of these regulations.

Thank you for your consideration and for your stewardship of Georgia's coastal resources.

Sincerely,

Erin and Jack Cay

Savannah, Georgia

Patrick, Diana

From: Sharen Martin <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 2:14 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Sharen Martin
[redacted]

Patrick, Diana

From: Diane Klement <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 2:16 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Diane Klement
[redacted]

Patrick, Diana

From: Adlai Platt <[redacted]>
Sent: Wednesday, September 30, 2026 2:20 PM
To: Comments, CRD
Subject: Stop giving away state lands to benefit a few wealthy individuals

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.

Attention Jill Andrews,
GA DNR is supposed to be the entity protecting natural resources and state owned lands and waters in GA. The proposed give away of sensitive and delicate habitats to benefit a few landowners is wrong in every way.
Where lesser docks have already been allowed to punch through the marshlands to connect to creeks, major degradation occurs over time, including trapping wrack that smothers the marsh, blocked creeks, contested access over ownership of lands that belong to all Georgians, creek collapse over time, loss of habitat and breeding grounds, salt pans that form over time, and then more flooding as the marsh degrades. This is already easy to observe where the state has previously allowed shorter versions, and can be seen by anyone traveling I-95.
Our family urges you to vote down this giveaway of valuable and important public lands and waters, before more of Georgia's coastal wetlands are ruined.
Not private benefit of a few, but protection of public property to benefit all.

Thank you,
Ad Platt
Effingham County

Patrick, Diana

From: William Dopson <[redacted]>
Sent: Wednesday, September 30, 2026 2:24 PM
To: Comments, CRD
Subject: new private 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.

Dear Ms. Jill Andrews,

I was a co-chair of the "Ad Hoc Committee to Save Our Marshes" in 1970. The committee was composed of students, faculty and staff of The University of Georgia and was formed to support the legislation introduced by Representative
Reid W. Harris in 1970 to protect Georgia's salt marshlands. There was a number of groups such as ours in the state at that time supporting the legislation. Literally thousands of Georgia's citizens *actively* supported the legislation.

At the time the legislation was passed and signed into law by Governor Maddox we were all convinced that the Georgia Game and Fish Commission, now DNR, would protect the salt marshes of Georgia from harmful private interests. However, it now appears to many of us that DNR is acting in the best interest of marsh-side homeowners and developers and not in the best interest of the salt marsh.

I strongly urge DNR to deny the proposed rule that would allow docks up to 1500 feet to be constructed over Georgia's salt marshes.

William Dopson

C. William Dopson, Jr.
[redacted]

Patrick, Diana

From:	Teresa Ashman <civicinput@newmode.io>
Sent:	Wednesday, September 30, 2026 2:28 PM
To:	Comments, CRD
Subject:	Don't privatize our marshes: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Teresa Ashman
[redacted]

Patrick, Diana

From: Mustang Sallie <[redacted]>
Sent: Wednesday, September 30, 2026 2:34 PM
To: Comments, CRD
Subject: Personal Comment, CRD Proposed Dock Rule Sept 2026

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,

The current proposed rule will negatively impact many flora and fauna, as well as devastate our marshes and the numerous species who depend on this environment. It will also affect how we recreate this shared resource.

Implementation of the proposed rule would allow private landowners to build docks larger than any private docks in this eastern area of the U.S. There are no current studies on safety and overall aesthetic in many of the shared waterways. With such grandiose docks being built in large numbers how will this development impact marsh areas with construction consequence, chemical leaching, and imposing massive shaded areas blocking sunlight to much of the marsh vegetation?

I strongly oppose the current proposed rule and urge the Board to listen to the concerned constituents instead of private interest of just a few. Please protect our resources, the value it holds, and the ecosystems that depend on your authorized protection. Please lookout for our future valuable natural resources and assets they provide as well.

Sallie Cooper
Fortson, Georgia

Patrick, Diana

From: C. Tyson Edwards <[redacted]>
Sent: Wednesday, September 30, 2026 2:48 PM
To: Comments, CRD
Subject: Public comment opposing the proposed private dock rule — September 2026

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 oppose the proposed rule changes for private docks on Georgia's coast.

Georgia's marshes are a public trust resource, and the proposed rule would hand a few private landowners the right to build docks longer than anything else in the Southeast. That is a major change to make without a complete inventory of existing docks and without any study of the individual or cumulative impacts these structures would have on the marsh, the species that depend on it, and the people who use it for recreation.

I am a father, and I want my kids to experience Cumberland Island the way it was meant to be experienced: wild, quiet, and intact. Places like this are not destroyed all at once. They are lost through a thousand small concessions, each one defensible on its own, until one day the sacred thing is simply gone. This rule is one of those small concessions, and I do not want to explain to my children why we let it happen.

Until the state has real data on what these docks would do to the marshes it is charged with protecting, the responsible move is to reject the proposal. I urge you to vote no on the current proposed rule.

Tyson Edwards
Decatur, GA

Patrick, Diana

From: Rebecca Lang <[redacted]>
Sent: Wednesday, September 30, 2026 2:17 PM
To: Comments, CRD
Subject: Proposed New Rules for 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 DNR Coastal Resources Division,
The Coastal Marshlands Protection Act (CMPA) in 1970 placed salt marshes in Georgia in the public trust. Our marshes are owned by all Georgians and are protected by law. Allowing docks of 9,000 square feet over publicly owned salt marsh is a direct violation of the CMPA.
The mission of the Georgia DNR is to sustain, enhance, protect and conserve Georgia's natural, historic and cultural resources for present and future generations.
Increasing the dock square footage to larger than what any other bordering state allows is in conflict with that mission. Follow your mission and do your job to protect the salt marshes for the public, for future generations, and for the diverse ecological benefits they bring to our state. There is no need to increase dock sizes in Georgia.

Rebecca Lang
Athens, Georgia and Little Cumberland Island, Georgia

Patrick, Diana

From: Barbara Howerton <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 2:54 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

Our regulations must be clear and strong, balancing marsh protection with responsible shared access. Specifically, I ask that CRD limit the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)) and prohibit boat hoists on creeks less than 20 feet wide at mean high water (Section 391-2-1-.04(5)). I also request a new section be added (Section 391-2-1-.10) to enable the CRD to charge fees to support staff time and resources dedicated to permit review, applicant assistance, and final inspection after the permit is completed. This fee-based system can also support building a more accurate dock database to monitor the cumulative impacts of docks on our marshes.

Thank you for including protective measures for our wildlife that prohibit free-flowing water that threatens the welfare of manatees and require turtle-sensitive lighting on private docks.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Barbara Howerton
[redacted]

Patrick, Diana

From: Maggie Van Cantfort <maggie@altamahariverkeeper.org>
Sent: Wednesday, September 30, 2026 3:09 PM
To: Comments, CRD
Cc: Andrews, Jill; Haymans, Doug
Subject: Dock rule 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.

Resubmitting our comment letter submitted in the previous round and adding that we support the comments submitted by SELC, One Hundred Miles, The Nature Conservancy, and Georgia Conservancy.

We strongly encourage CRD/DNR to prioritize marsh health and protection of our natural resources over the interests of, relatively few, wealthy individuals whose private docks will adversely impact our public resources.

Respectfully,

--
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

ALTAMAHA RIVERKEEPER
OCMULGEE | OCONEE | OHOOPEE | GOLDEN ISLES

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

ALTAMAHA RIVERKEEPER
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> "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.

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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.

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(912) 223-6073
maggie@altamahariverkeeper.org

ALTAMAHA RIVERKEEPER
OCMULGEE OCONEE OHOOPEE GOLDEN ISLES

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: David Kyler <susdev@gate.net>

Sent: Wednesday, September 30, 2026 3:12 PM
To: Comments, CRD
Subject: ***PLEASE CONFIRM RECEIPT ***CENTER FOR A SUSTAINABLE COAST COMMENTS ON PROPOSED DNR DOCK RULES
Attachments: Comment Ltr to CRD (Rules for Private Docks), FINAL, 7-24-26.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.

Attention: Jill Andrews
Coastal Resources Division
Georgia DNR
One Conservation Way
Brunswick, GA 31520

Topic: Center for a Sustainable Coast comments on proposed rules for private docks, submitted on 9-30-26

Attachement: Previous comments on the proposed rules by the Center for a Sustainable Coast, submitted in July 2026

Additional references: Citations from other relevant sources are featured in hyperlinked entries below.

Ms. Andrews:

In addition to our previous letter submitted to CRD on July 24, please enter the following into the record of public comments on the proposed private dock rules for consideration by the DNR board.

Assessment of Public Interest:

According to detailed analysis of the proposed DNR dock rules, approximately 1500 properties could be affected by these regulations if they are adopted as proposed. If all such property owners built access boardwalks to the maximum allowable length of 1500 feet, the area of marshlands directly degraded by the measure would exceed 300 acres. In addition to the ongoing harm done by boardwalk shading caused by these rules, the consequences of coastal storm damage to boardwalks would be greatly multiplied, risking additional marsh contamination and public harm resulting from debris being spread across vast areas of surrounding marsh.

Moreover, reputable online sources estimate that the price of such properties would increase between 10 and 15% when new access to waterways is accommodated by these regulatory reforms. Thus, if adopted these new rules will cause a cumulative increase in the potential market value of the 1500 properties affected, which would be in the hundreds-of-millions of dollars.

Any benefits being used to justify an increase in the length of dock access structures from 600 to 1500 feet will be gained by only a select wealthy few who can afford such properties or by developers already owning such properties who will greatly profit from the projected increase in market value generated by this measure. Conversely, the vast majority of Georgians will suffer both degradation of

the tranquility and beauty of natural marsh vistas as well as a decline in the vital fish and wildlife habitat functions of tidal marshlands. Both of these uniquely valuable public benefits are meant to be protected under Georgia's Coastal Marshlands Protection Act of 1970.

Furthermore, the ecosystem services of Georgia's marsh habitat are essential to sustaining commercial fishing and tourism businesses which directly and indirectly support tens of thousands of Georgia households. Likewise, the value of these areas in their undisturbed state add immeasurably to the region's quality of life enjoyed by millions of Georgia citizens as residents and visitors.

Note that the CMPA declares that the marshes of the state are to be held and conserved as a public trust resource. The proposed private dock rules directly conflict with Georgia's public trust doctrine by favoring a few private individuals who will benefit as the expense of the Georgia citizens who will incur the degradation of, and added risks to, the state's vulnerable marshlands.

Conclusion:

Based on our well-reasoned, factual analysis, the Center for a Sustainable Coast finds that **the proposed dock rules are not in the interest of the state** because they violate the intent and purpose of Georgia's Coastal Marshlands Protection Act by benefiting a privileged few while the vast majority of Georgians would be harmed by jeopardizing the critical value of these natural areas as a public trust resource.

Submitted by:

David Kyler, Co-Founder & Director
Center for a Sustainable Coast
221 Mallery Street, Suite B
Saint Simons Island, Georgia 31522

CENTER FOR A SUSTAINABLE COAST

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

221 Mallery 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,



Center for a Sustainable Coast
www.sustainablecoast.org
Text & Voice: 912.689.4471

Patrick, Diana

From: Debbie Critz <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 3:18 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

Debbie Critz I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. We live on Grimball Creek in Isle of Hope and treasure our home and property. Not sure why you would go to all of the time and effort to convene an expert and diverse committee to study and make suggestions for new dock construction and then ignore their proposal. It's a real shame and an embarrassment that influence and behind the scene machinations can trump the welfare and beauty of our coast. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Allowing private 1,500-foot docks to be built by-right, *and* including a variance process, only benefits the wealthiest Georgians, who would be able to buy access to the water regardless of how much public land they must cross.

Clear regulations help dock builders and homeowners comply to standards that protect our marshes and natural resource users. Specifically, please change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). In Section 391-2-1-.02(13)(a&b), please add specific definitions for "minor maintenance" and "major maintenance." Also clarify the definitions of "modification" and "reconstruction" to eliminate confusion and overlap (Section 391-2-1-.02(16&21)).

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Debbie Critz
[redacted]

Patrick, Diana

From: Danielle Louise <[redacted]>
Sent: Wednesday, September 30, 2026 3:33 PM
To: Comments, CRD
Subject: Personal comment, CRD Proposed Dock Rule - Sept 2026

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 state my strong opposition to the proposed private dock rule.

As written, this rule would allow private landowners to build docks larger than any private docks in the Southeast. That is not a modest adjustment to the existing framework. It is an unprecedented giveaway of a shared public resource.

Implementing this rule will devastate our marshes, harm countless species of flora and fauna, and jeopardize public recreational use of waters that belong to all Georgians.

The Board is moving forward without the most basic information it needs:

- There is no complete inventory of existing private docks in Georgia.
- There has been no study of the individual or cumulative impacts of docks this excessively long.

Without this data, I do not see how the Board can possibly understand how these changes will affect the very public trust marsh resources it is charged with protecting. Adopting a rule in the absence of that knowledge is negligent.

I completely oppose the proposed rule. I urge the Board to listen to the constituents it serves, stop catering to the interests of a few, and fulfill its duty to protect the resources it has been authorized to safeguard. I expect the Board to reject this proposal.

Sincerely,

Danielle Ramos
Decatur, Georgia

Patrick, Diana

From: Mary Ziegler-Martin <[redacted]>
Sent: Wednesday, September 30, 2026 3:54 PM
To: Comments, CRD
Subject: NO to the proposed SE dock building rule!

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 the Coastal Resource Division:

Wow, it's been a busy year for trying to undermine environmental protections!
I am in vehement oppose to the Sept 2026 proposed dock rule.

We have no idea just how many private docks there are in the state of GA, and you want to open it up so that private landowners can build docks that are larger than any private docks in the Southeast?

That will decimate our marshes, negatively impact species native (and probably endangered) to those areas, and increase recreational use in those waters, intended to be a shared resource for all in the ecosystem.

There has been no study of what individual and cumulative impacts of such ridiculously long docks may be.

Exactly how does the Division adequately understand how changes to the private dock regulatory framework will impact the very public trust marsh resources it is charged with protecting? That is your JOB.

I completely oppose this proposed rule and urge the Board to listen to its constituents; please stop bowing to the interests of a few, mostly wealthy landowners and instead look out for the resources you are authorized to protect.

Mary Martin
[redacted]

Patrick, Diana

From: Dale Critz Jr. <[redacted]>
Sent: Wednesday, September 30, 2026 3:59 PM
To: Comments, CRD
Subject: Proposed Dock Size 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.

To: Coastal Resources Division
Georgia Dept of Natural Resources

From: Dale Critz Jr
[redacted]

Re: Draft Dock Regulations

I am writing in opposition to the proposed regulations that will increase the allowed walkway to 1,500 feet long and 6 feet wide, or 9,000 total square feet. I believe that a limit of 1,000 feet or 4,000 square feet total is more than adequate to balance property rights and shared access with marsh protection. I have spent most of my 68 years on the tidal waters of coastal Georgia and the low country of South Carolina and I can testify to the marsh damage and visual pollution that will result from opening up our marshes to multiple docks of the proposed size and length. These regulations if implemented would be a perfect example of the "Tragedy of the Commons"; where individuals with access to a shared, unowned resource act in their own self-interest and unintentionally deplete or ruin it for everyone. When weighing the property rights of the landowners that would now be able to build docks, the state would be giving a tremendous "free gift" at the expense of us all. These property owners purchased or inherited these properties knowing full well that a dock was not allowed under the current rules.

I reiterate that I am firmly opposed to the draft regulations as proposed!

Dale Critz Jr



Dale C. Critz, Jr.
President

[redacted]

[redacted]

www.critz.com

Patrick, Diana

From: Benjamin Carswell <benjaminlanecarswell@gmail.com>
Sent: Wednesday, September 30, 2026 4:01 PM
To: Comments, CRD
Subject: Comments on amendment of Subject 391-2-1
Attachments: CGAS_Dock Comment letter to DNR_9.30.2026.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.

Good afternoon, please consider the attached comment letter submitted on behalf of the Coastal Georgia Audubon Society.

Kind regards,

Ben Carswell
President, Coastal Georgia Audubon Society

COASTAL GEORGIA AUDUBON

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, as presented to the GADNR Board in August 2026

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 emphatically oppose the revised draft rules released in August 2026 which 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.** We previously submitted our concerns in response to the earlier iteration of the draft rules released in June. The purpose of this letter is to convey that these concerns are only further amplified by the new draft rules released in August. If adopted, **the proposed rules would allow for unacceptably harmful effects on marsh-dwelling bird populations**.

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 macgillivraii*), 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

COASTAL GEORGIA AUDUBON

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 1,500 linear foot walkway (or 1,650 feet if a 10% variance is granted) at six (6) feet wide, implying a total of 9,000-9,900 square feet, **tripling the current limit.** This footprint vastly 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, an affect that can be compounded the accumulation of mark wrack commonly trapped around docks.

We appreciate CRD's intent 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 conservative limits on dock size more in line with policies established for coastal zones in neighboring states, 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 gratuitously large private recreational docks. Doing so would fail to honor the State's responsibility as stewards of the public trust for all Georgians, not just the few with the means and desire to build extremely large docks that will harm an already strained coastal marshlands ecosystem, or to profit from that activity. Our marshlands are a vital public resource held in trust for present and future generations, and the rules governing their use must uphold 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

Ben L. Carswell, President
Coastal Georgia Audubon Society

COASTAL GEORGIA AUDUBON

Citations:

[1] GA State Wildlife Action Plan: https://ga-state-wildlife-action-plan-gadnrwrd.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

[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: Paget Hines <[redacted]>
Sent: Wednesday, September 30, 2026 4:07 PM
To: Comments, CRD
Subject: 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.

To the Coastal Resources Division:

I am writing to comment on the proposed rules for private docks in Georgia's state-owned tidal waters. The marshes along Georgia's coast are a real treasure. They are a spiritual and sublime place that I have enjoyed visiting since my childhood with my parents and grandparents.

I am concerned that the current draft would allow dock walkways up to 1,500 feet long and 6 feet wide, 9,000 square feet total, with a variance process permitting an additional 10 percent. This is triple the size CRD proposed earlier this year, despite most public comments at that time asking for stronger protections, not weaker ones.

Docks of this scale fragment marsh habitat, shade marsh grass, and collect wrack, and the longest proposed docks could cross nearly a third of a mile of public marsh, limiting shared use and raising the risk of storm damage. I ask CRD to significantly reduce the maximum length and width allowed, tighten the variance process, and adopt a final rule that reflects the public's clearly stated preference for stronger protections, consistent with the intent of Georgia's Marshland Protection Act of 1970.

For my entire lifetime Georgians of all stripes have taken pride in protecting our wild places and coastline. Whether the Okfenokee, Cumberland Island, or tidal marshes, these natuaral wonders deserve or continued and steadfast protection.

Thank you for considering my comments.

Kind Regards,
Paget Hines
Atlanta, GA

Patrick, Diana

From: Robert Del Bueno <civicinput@newmode.io>
Sent: Wednesday, September 30, 2026 4:19 PM
To: Comments, CRD
Subject: Keep our marshes healthy and beautiful: pass stronger 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.

Dear Ms. Andrews,

The recent updates that defy the transparent process is absolute bullshit.

Is the current plan to just allow a handful of well connected wealthy people rewrite the standards to thier liking?

Why bother with the BS act.

I am writing to urge the Board of Natural Resources to reject the current draft rule for private docks and ask Coastal Resources Division to revise the draft rules. The rules introduced to the DNR Board in August **triple** the current square footage allowance of fixed walkways for private docks. Docks this big will harm marsh habitat by shading, wrack accumulation, and fragmentation. They will also compromise public access to this shared resource held in trust by DNR *for the public*—not a select few.

We need clear regulations and strong management practices to protect our marsh and continue to encourage public access. Specifically, I ask that the CRD change the proposed draft rules by limiting the maximum length of the walkway to 1,000 feet or 4,000 square feet total (Section 391-2-1-.04(2)). This complies with South Carolina's standards and will allow private docks to only cause "minor alteration" to our marshlands, as defined in the Coastal Marshlands Protection Act. CRD must also specify what makes an applicant eligible to be considered for a variance (Section 391-2-1-.07), and codify the variance process to ensure it is based on science and considers impacts to habitat and viewshed.

Thank you for including protective measures like prohibiting bridging or spanning waterways measuring 20 feet wide or greater and requiring electrical permitting proof.

New rules regulating activities in public marshlands must protect the public and wildlife and be based on research and data. I respectfully request the Board of Natural Resources and CRD revisit the draft rule for private, recreational docks and uphold reasonable regulations that honor the legacy of protecting this shared public resource.

Sincerely,
Robert Del Bueno
[redacted]

Patrick, Diana

From: Jordan Caverzasi <[redacted]>

Sent: Wednesday, September 30, 2026 4:21 PM
To: Comments, CRD
Cc: Shelia Stephens
Subject: Attn: Jill Andrews - Dock Regulation

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 Chief Andrews, Commissioner Rabon, Chairwoman Addison, and Mr. Jones,

As the Department of Natural Resources formalizes Subject 391-2-1 to govern private recreational docks in state-owned tidal waters, your primary focus has been on structural footprints. Following Mr. Jones' recent motion regarding the 1,500-foot gangway limitations, it is clear the Board is deeply engaged in regulating how these structures occupy public trust lands. However, the proposed rules contain a critical loophole regarding utility infrastructure that poses an immediate, catastrophic threat to human life.

The recent electrocution fatality on a private tidal dock in Glynn County, which claimed the life of my 19 year old brother, underscores that structural enforcement without ongoing electrical oversight completely fails to protect the public utilizing our state's waterways. This was a preventable accident and it is vital that regulation is put into place to ensure that it does not happen again.

The DNR's current draft wisely recognizes its authority by requiring an initial electrical permit compliance check. However, because harsh marine elements, storm surges, and tidal friction cause unpredictable wear to grounding systems and subpanels over time, a one-time check at construction is legally and operationally insufficient to guarantee long-term safety.

Because these structures sit entirely on public land, the DNR regulates them by issuing a Revocable License. This means having a dock over state water bottoms is a temporary privilege, not a permanent property right. The DNR has the explicit statutory authority under O.C.G.A. § 50-16-61 to attach strict safety conditions to these licenses—and revoke them if those conditions are breached.

To bridge this safety gap, we request a direct, fact-based amendment to the final draft of Rule 391-2-1:

"Any Revocable License issued for a private recreational dock utilizing utility-provided electrical service shall be strictly conditioned upon the property owner maintaining a valid electrical safety certification. Property owners must submit a safety compliance report, signed by a licensed third-party electrical contractor, on a recurring cycle of every three (3) to five (5) years based on the age and type of the structure. Failure to maintain this safety certification shall be grounds for immediate license revocation and utility disconnection."

This amendment requires zero capital expenditure or operational expansion from the DNR:

No Field Work for DNR Staff: The technical field testing, diagnostic verification, and legal liability are handled entirely by private, licensed third-party marine electricians hired and paid for directly by the

dock owner.

Simple Administrative Execution: The Coastal Resources Division simply acts as a digital repository, holding the electronic safety compliance affidavits right alongside the existing revocable license paperwork.

Existing Precedent: Tying safety checks to public land use is standard practice. If the DNR has the administrative framework to tightly police dock lengths, walkway widths, and environmental footprints over public marshlands, it possesses the exact same capacity to require a digital safety certificate to prevent direct electrocution in those same waters.

If the state is going to grant elite property owners the extraordinary privilege of building massive structures across public marshlands, it must ensure those structures are not leaking lethal voltage into public water. We look forward to this necessary safety adjustment being integrated before the rules are submitted for a final vote on October 27, 2026.

Sincerely,

Jordan Caverzasi

[redacted]

Patrick, Diana

From: Will Harlan <[redacted]>
Sent: Wednesday, September 30, 2026 4:26 PM
To: Comments, CRD
Subject: Georgia dock rule comments
Attachments: Georgia dock rule comments.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 Georgia Department of Natural Resources Coastal Resources Division:

Attached are comments from the Center for Biological Diversity on the proposed dock rule. Thank you for considering these comments.

Sincerely,
Will Harlan

Will Harlan
Southeast Director and Senior Scientist
Center for Biological Diversity
Asheville, N.C.
828-230-6818

CENTER for BIOLOGICAL DIVERSITY

September 30, 2026

Georgia Department of Natural Resources
Coastal Resources Division
Attn: Jill Andrews
One Conservation Way
Brunswick, GA 31520
crd.comments@dnr.ga.gov

Dear Ms. Andrews,

On behalf of our 1.8 million members and supporters, the Center for Biological Diversity submits the following comments regarding the proposed rules for private docks located over state-owned tidal water bottoms.

We have serious concerns about the proposed rules. They could damage marsh ecosystems, encourage development on currently undeveloped uplands, and spur the construction of numerous oversized private docks and subdivisions along Georgia's coast. They also appear to place the convenience of affluent private property owners ahead of the public's right to access and enjoy the marsh. If adopted, the rules would leave Georgia with substantially weaker protections than neighboring Southeastern states.

Research has documented the harmful effects that large docks can have on salt-marsh plants and wildlife, including vegetation loss, habitat fragmentation, and reduced biodiversity.

A major source of harm is the loss of vegetation beneath and near docks. Shade from dock structures, changes in water movement caused by pilings, and possible contamination from building materials can all contribute to this damage.

One study estimated that docks shaded an area equal to about half their own footprint. It also found that cordgrass stem density declined by an average of 56%, while biomass fell by 21–37% compared with nearby areas. Those losses can affect commercially valuable species because cordgrass supports the food web and provides habitat for

ecologically and economically important coastal wildlife. It also helps limit erosion and filters nutrients and contaminants from the water.

Research has also linked shade-related vegetation loss to the development of salt pannes beneath docks, where salt accumulates on exposed, mostly bare mud. These conditions can encourage pickleweed to grow and increase the amount of light cordgrass needs, making it more vulnerable to further shading.

Dock pilings can compound these effects by slowing water flow and allowing marsh vegetation debris, known as "wrack," to build up around the structure.[16] The accumulated debris may smother marsh plants, causing further vegetation loss, erosion, and harm to marine life. Wrack can also obstruct tidal creeks, interfere with navigation, and increase flood risk for nearby properties. One property owner reported that a neighbor's newly built 880-foot walkway extension led to seven acres of wrack accumulating on one side of the dock. She described the result as a "creek collapse," with healthy marsh becoming "dead pan salt flats," as well as increased flooding on her property.

Docks also create more edge habitat within marshes. This can harm species that rely on marshes for nesting, feeding, and shelter. Many grassland birds, for example, have lower nesting success near habitat edges, where predators are often more common. More edge habitat can give predators greater access to prey and nesting birds, including marsh-dependent species such as the saltmarsh sparrow. These species are not only exposed to greater danger; they also have less safe habitat in which to nest.

The proposed rules would magnify these harms by allowing private docks to be considerably longer and wider than current standards permit. Larger structures would predictably increase both the direct and cumulative effects of dock construction.

Under the proposal, private docks could exceed 10,000 square feet, more than three times the current 3,000-square-foot limit. This is well above the Coastal Marshland Protection Act's definition of a minor impact—0.1 acres, or 4,356 square feet—and could result in substantially more vegetation loss from shading and wrack accumulation.

The proposed rules would also permit walkways as long as 1,650 feet: a 1,500-foot baseline limit plus a 10% variance. That is more than 50% longer than the existing 1,000-foot limit. Longer docks would also allow predators to travel farther into marsh habitat, increasing the risks faced by vulnerable marsh birds and other prey species.

The proposal could also lead to many more docks crossing Georgia's marshes, multiplying their combined effects. Raising the walkway limit from 1,000 feet to 1,500 feet—or as much as 1,650 feet with a variance—would give many more upland properties access to deep water when they cannot obtain it under the current rules.

As a result, more exceptionally long docks are likely to be built across the state's marshes. The accompanying comparison shows how currently undeveloped, pristine marsh could be affected if longer docks are permitted.

DNR should not spend public resources developing rules that primarily benefit a small, privileged group. Recent reporting has troublingly indicated that the agency proposed easing the 1,000-foot walkway limit after two individuals seeking longer docks advocated for a change behind the scenes. The Board should consider this account when deciding whether the proposal serves the interests of all Georgians.

The proposed rules could also accelerate upland development. They may encourage development on undeveloped marsh-front properties that currently lack deep-water access. Developers could be incentivized to buy these properties, divide them into small lots with only the minimum required marsh frontage, build luxury homes, and advertise them as having deep-water access. Georgia's coastal counties already face substantial development pressure; the proposed rules could add to it.

The proposal also conflicts with DNR's responsibility to protect the public interest in Georgia's marshes. Existing limits were intended to keep private docks from exceeding the size of community docks. Yet the proposed rules would allow private docks to be more than 50% longer and several times larger than the largest community dock permitted under Georgia regulations.

As described above, these oversized structures could also have much greater effects on marsh ecosystems. Giving private property owners greater convenience at the expense of public access to healthy, unobstructed marshlands would turn DNR's public-trust responsibility on its head. The agency should manage and protect these resources for everyone, not only wealthy landowners.

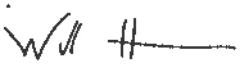
The proposed standards would also make Georgia an outlier in the Southeast. They would more than triple the size of private docks allowed under current rules and exceed restrictions in neighboring states. South Carolina, for example, limits private docks to 1,000 feet in length, including all structures, and restricts walkways to four feet wide. In Florida, the total area of a private dock—including its walkway and end platform—is generally capped at 2,000 square feet.

Under Georgia's proposed rules, a single-family private dock could occupy more than five times Florida's generally applicable area limit, while its walkway could be 50% longer than South Carolina's maximum. These limits would set Georgia apart from its neighbors. Georgia has historically led the Southeast in marsh protection, but this proposal would mark a significant step backward.

The Center urges Georgia DNR not to adopt the proposed rules or increase the allowable length of private docks. As a steward of the public's interest in the marshlands, DNR

should put the public first in any decision affecting this resource.

Thank you for considering these comments.



Will Harlan
Southeast Director
Center for Biological Diversity

Patrick, Diana

From: Tory Adams <[redacted]>
Sent: Wednesday, September 30, 2026 4:29 PM
To: Comments, CRD
Subject: Proposed 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.

Dear Ms. Andrews,

Thank you for the opportunity to comment on the proposed rules for private docks in state owned tidal waters. St. Marys Riverkeeper submits the following comments on behalf of the St. Marys River and St. Marys Riverkeeper Members and Supporters

St. Marys Riverkeeper (Riverkeeper) is a 501(c)3 private environmental advocacy organization that was formed in 2016 with the charge to protect the St. Marys River from harm and engage the community that calls the watershed home in that protection. Our work as an independent voice for the St. Marys River is made possible by the financial support of donations and memberships of concerned citizens within the watershed and surrounding region. Our work focuses on improving water quality in areas that are designated as swimmable and/or fishable, ensuring the river thrives for future generations through resilience projects and community partnerships, promoting low impact development in a fast-growing area, and advocating against industrial threats in our underserved communities.

As a border river, the St. Marys River watershed comprises four counties – two in Georgia and two in Florida – with roughly 200,000 residents who depend on the health of the river for tourism, recreation, commercial fishing, and safe drinking water. Arising from the Okefenokee Swamp, the St. Marys River flows 130 miles to the Atlantic Ocean at Cumberland Island National Seashore. The watershed is over 2,200 square miles, is comprised of 40% wetlands, and is home to several endangered, threatened, and rare species such as the Atlantic Sturgeon.

Because of the extensive tidal and wetland systems that are part of the St. Marys River watershed, Riverkeeper is particularly interested in the proposed rules for private docks and potential impacts within our watershed. Riverkeeper commends Georgia Department of Natural Resources (GA DNR) for seeking to update Subject 391-2-1 in regards to private dock standards and taking into account some of the environmental effects in their proposed rules. While many more impacts could be addressed, Riverkeeper encourages GA DNR to give particular consideration to three issues:

1. Shading Effect on Marshes

The proposed rule states that new private docks would be allowed one fixed walkway up to 1,500 feet long and 6 feet wide with proposed variance provisions for an additional 10 percent, or up to 150 feet, in some circumstances.

Given the increase in permitted length of these structures, from 1,000 feet to 1,500 feet, we believe GA DNR should more explicitly consider the effects of prolonged shading on coastal marsh vegetation.

Coastal marshes are foundational components of the St. Marys River's ecological system and most other coastal waterways in Georgia, as Georgia contains one of most extensive and productive marshland systems in the United States[1]. Coastal marshes provide critical nursery habitat for many species, protect shorelines from storm surges, and act as a natural filtration system to improve water quality and retain sediment. Their health dictates the stability of food webs and the overall function of the watershed.

Therefore, we urge GA DNR to consider the ecological effects of a longer walkway beyond the physical structure. A study on dock shading done in New England found that Spartina alterniflora aboveground biomass was reduced by as much as 87% after three years depending on the height of the dock[2]. Shading can affect the growth and persistence of marsh vegetation, and changes in vegetation can consequently affect marsh stability and erosion. Increasing the amount of shade permitted can create a ripple effect that endangers the health of our waterways.

Riverkeeper requests that GA DNR consider the amount of marsh that would be shaded by proposed walkways as well as existing structures and shaded areas in their review. It should also be considered whether variant walkways longer than the maximum need additional documentation regarding potential impacts to marsh vegetation.

2. Endangered and Other Protected Species

Georgia's marshes provide habitat and movement corridors for a variety of wildlife, including species protected under state and federal law. The proposed rules include provisions addressing protected species and require adherence to applicable best management practices, however, we urge GA DNR to provide greater clarity regarding species considerations within individual private dock licenses.

There is no information about how proposed dock locations will be screened for federally or state-protected species nor how potential impacts to protected species will be considered in the application process. If a sensitive habitat is present, what additional conditions or protective measures must be met before construction?

It is also important to consider the waterway as an interconnected system, with potential impacts to protected species going beyond the individual project. We encourage GA DNR to consider protected species impacts within the broader ecological context of the entire tidal system especially as some protected species, such as the federally endangered Atlantic Sturgeon, are still being studied to better understand their habitat use and potential spawning areas.

3. Cumulative Effects

Riverkeeper's greatest concern is that the proposed rules appear mostly structured around individual dock licenses and whether those licenses meet the dimensional and siting standards. The compliance of a single dock does not, however, mean that the cumulative effects of numerous structures will be insignificant. A South Carolina study calculated the cumulative salt-marsh loss from approximately 7,000 dock permits to be equivalent to about 148 acres[1]. This indicates that multiple long walkways, docks, boat lifts, and other structures concentrated along the same tidal creek or river could result in substantially greater effects on marsh vegetation and, in turn, the habitat, wildlife movement, and waterway function. Because tidal marshes and tributaries form an interwoven system, ecological impacts can quickly accumulate across property boundaries.

For this reason, we recommend that GA DNR include a step for evaluating cumulative dock impacts at the waterway or tidal-creek level in the licensing process. Including data for existing dock density, existing shading, and even environmental impact assessments can help ensure that individually compliant docks do not collectively result in impacts that the licensing process fails to recognize.

We strongly encourage GA DNR to consider the following impacts when reviewing private dock applications:

- The density of existing and proposed docks within a tidal creek or river reach;
- Existing and proposed marsh shading;
- Cumulative effects on marsh vegetation and habitat;
- Cumulative impacts to protected species and wildlife movement;
- Potential effects on tidal flow and marsh function

We also urge GA DNR to maintain publicly accessible records of private dock licenses, modifications, variances, and as-built surveys so that cumulative development within individual waterways can be understood and monitored over time.

Conclusion

Riverkeeper supports the establishment of clear and consistent regulations for private recreational docks. However, the framework should ensure that individual licensing decisions protect the ecological integrity of the larger tidal system in which these structures exist. We believe particular consideration should be given to the effects of long fixed walkways on marsh vegetation, protection of endangered and other protected species, and the cumulative effects of multiple dock structures within tidal waterways. Research has already been conducted by the Skidaway Institute of Oceanography that demonstrates significant vegetation impacts associated with private recreational docks in coastal Georgia and modeled for cumulative effects. They found an average 50% reduction in salt-marsh stem density beneath docks compared to nearby undocked marsh[1]. These results should be taken into account before increasing the longstanding 1,000-foot standard to 1,500 feet.

While private-dock rules are exempt from other coastal wetland permitting laws like the Coastal Marsh Protection Act, Riverkeeper believes they should still use the same protective principles when evaluating projects that do fall under those laws. Whether they increase erosion, channeling, or stagnant water, or have unreasonable interference with conservation efforts should be taken into account no matter the project.

We respectfully urge GA DNR to revisit and strengthen the proposed rules to ensure these considerations are incorporated into licensing, variance, monitoring, and enforcement processes. With appropriate safeguards and consideration of cumulative impacts, GA DNR can establish standards that provide reasonable access while maintaining the health and ecological function of Georgia's tidal waterways.

Thank you for considering these comments.

Sincerely,



Emily Floore
Executive Director
St. Marys Riverkeeper

Prepared and submitted by Tory Adams, Conservation Programs Specialist

[1]Georgia Department of Natural Resources, Coastal Resources Division. Salt marsh. https://coastalgadnr.org/salt-marsh

[2]Logan, J. M., Voss, S., Davis, A., & Ford, K. H. (2018). An experimental evaluation of dock shading impacts on salt marsh vegetation in a New England estuary. Estuaries and Coasts, 41(1), 13–24. https://doi.org/10.1007/s12237-017-0268-4

[3]Sanger, D. M., Holland, A. F., & Hernandez, D. L. (2004). Evaluation of the impacts of dock structures and land use on tidal creek ecosystems in South Carolina estuarine environments. Environmental Management, 33(3), 385–400. https://doi.org/10.1007/s00267-003-0019-0

[4]Alexander, C. R., & Robinson, M. (2006). Quantifying the ecological significance of marsh shading: The impact of private recreational docks in coastal Georgia. Coastal Resources Division, Georgia Department of Natural Resources.

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Tory Adams
St. Marys Riverkeeper
Conservation Programs Specialist
(405)519-1046

Patrick, Diana

From: Steven Luxenberg <[redacted]>
Sent: Wednesday, September 30, 2026 4:30 PM
To: Comments, CRD
Subject: New DNR Dock Rules Comment

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,

I'm writing about the new proposal for dock lengths to be considered in October by the DNR Board. I'm very disappointed that the recommendations of the appointed stakeholders' group was ignored by the Coastal Resources Division. Instead of the 1000' dock length with a 10% variance that was recommended by the majority of the group, the Division recommended 1500' dock lengths, plus a potential additional variance. That certainly doesn't serve the best interests of our coastlines, especially on marshes, since these docks inhibit the flow of materials floating on the water. It appears that this proposal was pushed through at the behest of a few specific property owners who would like longer docks off their property, and found lobbyists who curried favor in the CRD. This is NOT how DNR policies should be set. Please respect the input of the stakeholders' group and the many letter writers whose submissions were ignored. Thank you for your attention to this request.

Steven Luxenberg

Tybee Island, GA

Georgia Department of Natural Resources
Coastal Resources Division
Attn: Private Recreational Dock Rulemaking
One Conservation Way
Brunswick, GA 31520

RE: Comments in Opposition to Proposed Revised Rules for Private Recreational Docks (Ga. Comp. R. & Regs. Subject 391-2-1)

To the Board of Natural Resources and the Coastal Resources Division:

Please accept these comments regarding the Georgia Department of Natural Resources (DNR) Coastal Resources Division's (CRD) revised draft rules governing private recreational dock construction on state-owned tidal water bottoms. While I appreciate CRD's goal of establishing formal regulatory standards following the expiration of the U.S. Army Corps of Engineers Programmatic General Permit, I write to express my strong opposition to the draft rules as currently revised.

Rather than protecting Georgia's salt marsh ecosystems held in trust for the public, the revised proposed standards significantly expand allowable private dock dimensions, remove crucial square-footage caps, and risk cumulative environmental harm to our coastal resources.

I urge CRD and the Board of Natural Resources to revise the draft rules to incorporate the following protections:

My Areas of Concern

1. Excessive Increase in Dock Length and Footprint

The revised draft allows fixed dock walkways up to 1,500 linear feet in length (1,650 feet with a variance) and up to 6 feet in width.

- **Unprecedented Scale:** Expanding allowable walkway length to 1,500 feet—more than 50% beyond standard historical practices and neighboring states—and with a possible width of 6 feet allows single-family docks to cover up to 9,000 to 9,900 square feet (nearly a quarter of an acre) of coastal marsh per structure.
- **Removal of Square-Footage Limits:** Under prior guidance, walkway coverage was functionally constrained by a 3,000-square-foot maximum footprint. Eliminating total square-footage limits for private walkways grants disproportionate private coverage over public trust waters.

2. Ecological and Shading Impacts on Salt Marsh Health

Georgia's salt marshes are among the most ecologically productive ecosystems in North America, providing vital nurseries for fisheries, storm surge mitigation, and carbon sequestration.

- **Shading Damage:** Docks—particularly wide walkways (6 feet)—block essential sunlight, causing severe shading that degrades underlying *Spartina alterniflora* (marsh grass).
- **Wetland Degradation:** Allowing individual private dock structures to impact over 0.1 acres of tidal marsh without requiring mitigation undermines established state wetland conservation goals and creates severe cumulative impacts across coastal tidal creeks.

3. Encroachment on the Public Trust Doctrine

Outside of historic King's Grants, Georgia's coastal marshlands belong to the public, held in trust by the State. While marshfront landowners have reasonable rights to water access, marsh frontage does not equate to an

absolute entitlement to build massive structures across public property. Allowing single-family private walkways of up to 1,500+ feet prioritizes expanded private convenience over public interest and scenic coastal heritage.

4. Need for Subjective Variance Safeguards

The variance provisions allowing up to an additional 10% length (or up to 1650 feet) lack clear, objective, science-based criteria. Without rigorous standards, hardship evaluations risk becoming subjective, creating unnecessary burdens on DNR staff and potential regulatory inconsistency.

Requested Revisions

To ensure private dock rules balance access with natural resource protection, I respectfully request that the Board and CRD amend the draft rules to:

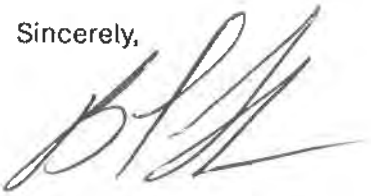
1. **Reimpose a Total Footprint Limit:** Restore a maximum shading footprint limit of **3,000 square feet** for private walkways and structures.
2. **Cap Walkway Lengths:** Cap walkway lengths at reasonable historical limits (e.g., 1,000 feet) with requirement for written, science-based environmental justification for any exceptions.
3. **Define Strict Variance Standards:** Establish objective, science-based hardship criteria for any proposed variance, requiring evaluation of cumulative impacts and alternative access options.

Conclusion

Georgia's salt marshes are a finite public asset. Codifying rules that double or triple the allowable footprint of private docks over state-owned marshland sets a dangerous precedent for future coastal development. I ask CRD and the Board of Natural Resources to uphold their statutory duty to safeguard our coastal environment by adopting stronger, conservation-minded limits on private dock dimensions.

Thank you for considering these comments.

Sincerely,



Bryan L Riemann, PhD
Homeowner and Georgia Resident
[redacted]

September 20, 2026

Dear Members of the Georgia Department of Natural Resources Board and Coastal Resources Division:

Thank you for the opportunity to comment on the proposed rules governing private docks in Georgia's state-owned tidal waters.

As a resident of coastal Georgia, I appreciate DNR's effort to establish clear and consistent rules for private docks. Property owners should have reasonable access to our waterways. At the same time, that access must be balanced with our responsibility to protect Georgia's salt marshes and tidal waters, which belong to all Georgians and are held in trust for future generations.

I am concerned that the proposed rules allow private dock walkways to be as much as six feet wide and 1,500 feet long without establishing an overall limit on the amount of public marsh that an individual dock may cover.

The issue is not whether Georgians should be allowed to have private docks. The question is how much of a public natural resource should be occupied by a private structure and what safeguards should be in place.

I respectfully ask DNR to strengthen the proposed rules in several important ways:

- **Establish a meaningful maximum size for private docks.** To comply with the standard established in the Coastal Marshlands Protection Act, the total impact of a private dock over state-owned tidal water bottoms should not exceed 0.10 acre to be considered minor. This would continue to provide flexibility for property owners while limiting the amount of public marsh affected by an individual private dock.
- **Require larger docks or exceptions to be justified by need and science.** Exceptions should not be granted simply because a larger structure is desired. Any departure from established standards should consider impacts such as marsh shading, habitat fragmentation, navigation, water quality, wildlife, viewsheds, and neighboring properties.
- **Clarify the rules for rebuilding and modifying existing docks.** The regulations should not unintentionally create a pathway for older, smaller docks to be expanded to the larger new standards simply because they require repair or reconstruction.
- **Provide meaningful notice and public review when exceptions are requested.** Adjacent property owners and the public should have sufficient information and an opportunity to comment when a proposed dock could have greater impacts on shared waterways and marshlands.
- **Improve oversight and accountability.** Georgia should maintain an accurate database of private docks, consider reasonable application fees to support DNR review and enforcement, and establish professional standards for dock construction.

Georgia's salt marsh is one of our state's greatest natural assets. It protects our communities, supports wildlife and fisheries, and is central to the character and economy of our coast. Once these public marshlands are fragmented or impaired, the consequences can extend well beyond an individual property.

I urge DNR to adopt clear, science-based standards that provide reasonable private water access while keeping protection of Georgia's publicly owned marshes and tidal waterways at the center of these regulations.

Thank you for your consideration and for your stewardship of Georgia's coastal resources.

Sincerely,

Suzanne Pruitt
Savannah, Georgia