

**Summary of Public Comments Opposing Proposed Rules
for Private Docks
October 15, 2026**

Topic of Concern	CRD Response
Size of fixed walkway increased from current practice: Length is 50% larger, overall allowable area is tripled, length exceeds other states; width of 6ft. exceeds needs for mobility impaired and facilitates golf carts.	CRD originally proposed fixed walkway limits that mirrored its current Standard Operating Procedures (SOP), which does not carry the authority of a rule, and existing CMPA rules for community and commercial docks and marinas. During the dock rulemaking process, CRD provided a briefing to the DNR Board, at which time the Board recommended all walkways be up to six feet wide, regardless of length, in order to ensure accessibility by homeowners. For this reason, CRD no longer recommends a standard based on square footage. Regarding walkway length, CRD originally proposed a maximum length of 1,000ft. but offered a 10% variance for unique circumstances. Following CRD's initial briefing to the Board in June 2026, the agency received new guidance on walkway length which resulted in CRD restarting the rulemaking process with a revised proposal. The Board was briefed on the new proposal on August 25, 2026, that included a walkway limit of 1,500ft. with a variance option that was not limited. However, the Board's Coastal Committee voted to limit the walkway variance to 10% and that recommendation was included in the public notice. The walkway length is an important consideration as it is a primary determinate of whether a waterfront property is riparian and able to have a dock, or marshfront and, therefore, "undockable."

Longer walkways will increase shading impacts, wrack accumulation and habitat fragmentation. Habitat for marsh obligate species is at risk, especially for those listed in the State Wildlife Action Plan as species of greatest conservation need (e.g., MacGillivray's seaside sparrow). Longer piers will penetrate deeper into new acres used for foraging and nesting, provide perch for predators.	Fixed walkways have the potential to trap and accumulate marsh wrack shade vegetation/reduce biomass by up to 56%, and/or fragment habitat for marsh obligate bird species. CRD funded studies have found impacts of docks on shading and marsh wrack accumulation that were not solely affected by dock length. Additional research found that docks longer than 30m negatively affect marsh obligate bird species; several are listed as species of greatest conservation need in Georgia's State Wildlife Action Plan. CRD has previously summarized these research findings for the Board's consideration.
Size of fixed walkway is not aligned with Coastal Marshlands Protection Act or Regulations for Community Docks, Commercial Docks and Marinas which limit fixed walkways in Community Docks to 3,000sq.ft. Size also exceeds the CMPA definition of "minor alteration" which are projects that impact less than one-tenth acre. Large projects should have public notification and/or input.	Private docks are specifically not regulated under the CMPA and, while the intention is to manage impacts to state-owned tidal water bottoms using many of the concepts provided in the Act, there are no matching requirements under O.C.G.A. 50-16-61 that projects must be minimized, must be in the public interest or must provide public notice of a proposed project. Nor is there a threshold of a "minor alteration," as there is under the CMPA, that defines projects with impacts under one-tenth of an acre.
Variance for walkway length is unnecessary or should have more specific criteria for demonstration of need or hardship, or be eliminated until more resource and assessment is completed. Variances for waterway extension and boat hoists should have more specific criteria.	CRD's current practice is to approve requests for additional boat hoists upon receipt of multiple boat registrations or other proof that there is more than one vessel at the dock. Similarly, CRD requires justification for extensions into the waterway and limits any dock from occupying more than one-third of the waterway. The variance for walkway length is new, but CRD anticipates requiring surveys, aerial measurements and other proof that additional walkway length is needed to reach the first waterway by following the shortest route from the riparian property.

Increase requirements for disclosure of electrical services to docks, permitting and frequent inspections. Rules should prioritize life and safety as much as standards for size of structure.	CRD proposes that applicants both disclose if electrical service will be extended on a dock and provide proof they have applied for such electrical service to their local jurisdiction. CRD staff do not have expertise to either review plans for or inspect electrical services. However, during compliance inspections, if a dock subject to these rules is found to have electrical service, CRD staff will be able to verify if it was properly permitted in accordance with local requirements.
Modify definitions: major and minor maintenance; modification and reconstruction - as written existing docks can be modified to a larger footprint.	Several comments suggested changes to definitions within the proposed rule. At this time, CRD believes the definitions to be well thought out and provide clear directions for staff and applicants. Specific public concern revolves around the footprint of existing docks being able to be enlarged during modification and reconstruction. It is CRDs recommendation that the standards proposed in the rule be applicable to all private docks subject to the rules.
Charge fee to support dock permitting and administration, compliance and debris removal and/or restoration.	Existing law does not allow CRD to charge a fee for dock applications as a way to support permitting and compliance staff, manage potential debris or restore marshlands.
Rules for private docks are not consistent with DNR's role as steward of public trust resources or public access to or enjoyment of resources	CRD's role as steward of state-owned tidal waters is to manage uses of public resources. The proposed rules seek to balance riparian homeowner access with preservation of the resource. Continued access to the marsh and navigation by the public has been considered. The rules require that spans, or bridges, across small tributaries be elevated to allow vessel passage underneath and docks may not block navigation. Larger creeks may not be spanned thereby preserving access to those waterways by the public.

Rules must protect public and wildlife and be based on research and data; CRD should have a complete inventory of docks; assess cumulative impacts.	Existing research and data have been discussed with stakeholders and provided to the Board for consideration. CRD currently maintains a database of issued dock permits but it does not represent a complete inventory. Many docks existed prior to CRD's role in permitting, and many have been illegally built without a permit and are not known. CRD is currently examining the feasibility of inventorying all docks for future assessments of cumulative impacts.