

**Shore Protection Act Application
Gould St., LLC
96 Gould Street
St. Simons Island, Georgia**

1.0 Introduction:

Gould St., LLC (applicant) proposes to undertake activities within the Shore Protection Act (SPA) jurisdiction at 96 Gould Street, on St. Simons Island, Glynn County, Georgia (latitude 31.136305°, longitude -81.402836°). The activities proposed within SPA jurisdiction, depicted on the proposed site plan produced by The Vine, titled *96 Gould Street, St. Simons, GA*, dated July 2, 2018 (Attachment G) include the following:

- Construction of retaining walls and privacy walls
- Construction of fire pit
- Construction of elevated non-native yard
- Installation of native landscaping
- Construction of a portion of residential dwelling

2.0 Existing Conditions:

The subject property is located on the Atlantic Ocean on the east side of Gould Street (Attachment F, Vicinity Map). The SPA jurisdiction line was verified by the Coastal Resources Division (CRD) staff via letter of November 30, 2017 and is depicted on the survey produced by Jackson Surveying, Inc. titled *Survey For: Lots 146 & 147 King City, G.M.D. 25, St. Simons Island, Georgia* dated July 12, 2017 (Attachment H).

The 26,413.85 ft² subject lot is cleared with scattered palm and live oaks, 8,089.96 ft² of which is defined as dynamic dune field under the jurisdiction of the SPA at O.C.G.A. § 12-5-232(8). An existing rock revetment is located at the upland limits at the seaward portion of the lot, 1,343.41 ft² of which is located within the dynamic dune field. An existing 286.96 ft² wood deck/gazebo was located near the revetment, which has been removed by the applicant.

3.0 Project Description

The applicant proposes to conduct land alteration in jurisdiction to construct a portion of a residential dwelling, retaining walls with an elevated astro-turf yard, privacy walls along the property lines, a fire pit with sitting area, and install native landscaping. Two (2) sets of stairs located in jurisdiction will provide access from the raised astro-turf yard to the native yard and landscaped areas. The fire pit area will be constructed with loose oyster shell gravel with brick paver edging and will extend along the west side of the house. A dune will be created in the southwest corner of the lot and will be constructed using beach quality sand from an upland source to a height of 6'. The dune, as well as other portions of the jurisdictional area, will be planted with native vegetation in accordance with the final landscape plan that will be provided to CRD staff for approval. Along the revetment on the landward side, a small beach area will be constructed with beach quality sand, surrounded by native plantings. Portions of the retaining walls will be located in jurisdiction and will contain the elevated yard and building pad from extending further into jurisdiction. Portions of the privacy walls along the side yard property lines will extend down to the revetment. A small portion of the house (1.08 ft²) will be located in jurisdiction at the southwest corner of the structure.

As proposed, 5,947.76 ft² (74%) of the jurisdictional area would remain in a natural or improved topographic and vegetative condition. The amount of alteration within jurisdiction for each component of the project is summarized in Table 1.

Table 1: SPA Activity Summary Table

PROPOSED ACTIVITY	AREA (SQUARE FEET)
Revetment (existing)	(1,343.41)
Fire pit	57.88
Retaining Walls	88.06
Privacy walls	56.42
Raised non-native yard	595.35
Dwelling	1.08
Beach creation	1,294.38
Dune creation	256.93
Native lawn	1,261.66
Native plantings	3,134.79
Total Activities existing & proposed	8,089.96
Total Area to remain in natural or improved state	5,947.76
Total Natural Area / Total JD Area	74%

4.0 Landfill / Hazardous Waste

According to the Hazardous Site Index for Georgia, the subject property is not located over a landfill or hazardous waste site and is otherwise suitable for the proposed project.

5.0 Requirements and Restrictions Regarding Issuance of Permit

As discussed below, the proposed project meets the requirements under which a permit should be granted:

O.C.G.A. § 12-5-239(c) states:

(c) No permit shall be issued except in accordance with the following provisions:

(1) A permit for a structure or land alteration, including, but not limited to, private residences, motels, hotels, condominiums, and other commercial structures, in the dynamic dune field may be issued only when:

(A) The proposed project shall occupy the landward area of the subject parcel and, if feasible, the area landward of the sand dunes;

There are no dunes located on the subject property. An existing rock revetment separates the property from the wet-sand beach area along this portion of St. Simons Island. All activities are located within previously cleared and undeveloped areas.

(B) At least a reasonable percentage, not less than one-third, of the subject parcel shall be retained in its naturally vegetated and topographical condition;

74% of the SPA jurisdictional area will be maintained in an existing or improved topographic and vegetative condition.

(C) The proposed project is designed according to applicable hurricane resistant standards;

The project will comply with the most current applicable hurricane standards. A letter from Mr. Brock Tobaben, dated February 7, 2018 certifying the design is included in Attachment E.

(D) The activities associated with the construction of the proposed project are kept to a minimum, are temporary in nature, and, upon project completion, restore the natural topography and vegetation to at least its former condition, using the best available technology;

Any impacts associated with construction of the proposed project will be restored to at least their former condition. Seventy-four percent (74%) of the SPA jurisdictional area will be maintained in an existing or improved vegetative and topographic condition post-construction.

(E) The proposed project will maintain the normal functions of the sand-sharing mechanisms in minimizing storm-wave damage and erosion, both to the unaltered section of the subject parcel and at other shoreline locations.

The proposed activities are located within previously developed areas landward of an existing rock revetment. These activities are not located in dunes or submerged areas and will not affect the normal functions of the sand-sharing system at the project area or other shoreline locations.

(2) No permits shall be issued for a structure on beaches, eroding sand dune areas, and submerged lands; provided, however, that a permit for a pier, boardwalk, or crosswalk in such an area may be issued, provided that:

(A) The activities associated with the construction of the proposed land alterations are kept to a minimum, are temporary in nature, and, upon project completion, the natural topography and vegetation shall be restored to at least their former condition, using the best available technology,

No activities are proposed on beaches, eroding sand dune areas, or submerged lands.

(B) The proposed project maintains the normal functions of the sand-sharing mechanisms in minimizing storm-wave damage and erosion, both to the unaltered section of the subject parcel and at other shoreline locations.

No activities are proposed on beaches, eroding sand dune areas, or submerged lands.

(3) A permit for shoreline engineering activity or for a land alteration on beaches, sand dunes, and submerged lands may be issued only when:

(A) The activities associated with the construction of the proposed project are to be temporary in nature, and the completed project will result in complete restoration of any beaches, dunes, or shoreline areas altered as a result of that activity;

No shoreline engineering activities or land alterations are proposed for this project on beaches, sand dunes, or submerged lands.

(B) The proposed project will insofar as possible minimize effects to the sand sharing mechanisms from storm-wave damage and erosion both to the subject parcel and at other shoreline locations;

No shoreline engineering activities or land alterations are proposed for this project on beaches, sand dunes, or submerged lands.

(C) In the event that shoreline stabilization is necessary, either low-sloping porous rock structures or other techniques which maximize the dissipation of wave energy and minimize shoreline erosion shall be used. Permits may be granted for shoreline stabilization activities when the applicant has demonstrated that no reasonable or viable alternatives exist; provided, however, that beach restoration and renourishment techniques are preferable to the construction of shoreline stabilization activities;

No shoreline engineering activities or land alterations are proposed for this project on beaches, sand dunes, or submerged lands.

6.0 Public Interest Statement

O.C.G.A. § 12-5-239(i) states:

(i) In passing upon the application for a permit, the permit-issuing authority shall consider the public interest which for the purposes of this part shall be deemed to be the following considerations:

(1) Whether or not unreasonably harmful, increased alteration of the dynamic dune field or submerged lands, or function of the sand-sharing system will be created;

The proposed activities are located within previously developed areas landward of an existing rock revetment. These activities are not located in dunes or submerged areas and will not affect the normal functions of the sand-sharing system at the project area or other shoreline locations. Proposed activities include creation of beach and dune habitats with native plantings.

(2) Whether or not the granting of a permit and the completion of the applicant's proposal will unreasonably interfere with the conservation of marine life, wildlife, or other resources;

The applicant's proposed project is located within an existing residential yard and will not unreasonably interfere with the conservation of marine life, wildlife, or other resources. All lighting associated with the project will be conducted in accordance with DNR Wildlife Resources Division's sea turtle nesting guidelines as well as Glynn County lighting regulations. The created beach and dune areas will be located landward of the existing rock revetment and will not be accessible by nesting sea turtles.

(3) Whether or not the granting of a permit and the completion of the applicant's proposal will unreasonably interfere with reasonable access by and recreational use and enjoyment of public properties impacted by the project.

The project will not interfere with access to or use and enjoyment of public properties. The proposed project will be conducted on private property.

7.0 Warranty Deed

The project area consists of the combination of Lots 146 and 147, King City. The warranty deeds and deeds of gifts conveying the subject properties to Gould St., LLC are included at Attachment B. Also attached are the Certificate of Organization and Operating Agreement for Gould St., LLC.

8.0 Vicinity Map

A location map of the subject property is included as Attachment F.

9.0 Adjoining Property Owners

The adjoining property owners are depicted in Attachment C.

10.0 Zoning Certification

Zoning certification from Glynn County Planning & Development certified via letter of March 7, 2018 (Attachment D).

11.0 Hurricane Certification

The project will comply with the most current applicable hurricane standards. A certification letter from Mr. Brock Tobaben February 7, 2018 is included in Attachment E.

12.0 Permit Drawings

The proposed activities within jurisdiction are depicted on the drawings produced by The Vine titled *96 Gould St., St. Simons Island, GA* dated July 2, 2018 (Attachment G)

13.0 Application Fee

A check for the application fee of \$100.00 was submitted upon delivery of the application.