

**Georgia Coast Holdings I, LLC
2795 Peachtree Rd. Unit 2405
Atlanta, GA 30305**

July 31, 2017

Karl Burgess
Georgia Department of Natural Resources
Coastal Resources Division
One Conservation Way
Brunswick, GA 31520

Re: Holiday Inn Resort, Georgia Coast Holdings I, LLC, (aka Parcel 108 & 110 Jekyll Island State Park, Glynn County, GA) located at 701 Beachview Drive N, Jekyll Island, GA 31527

Dear Mr. Burgess,

As you may be aware we have had initial discussions with Skye regarding this application and as a result we are seeking a Shore Protection Act Permit from the Georgia Department of Natural Resources Coastal Resources Division for the rear of the resort property to replace existing struggling common Bermuda turf (*cynodon sp.*) with Platinum TE™ Paspalum (*Paspalum vaginatum*), install a drainage system to treat seaward facing hotel building roof runoff, as well as the low-lying turf areas where ponding regularly occurs, and two bioswales planted as natural grassland habitats.

This proposed project is detailed in the attached plan, which has been submitted to the Jekyll Island Authority, and we are attaching a copy of the email from Jim Broadwell dated July 14, 2017 approving the plan for construction.

In an effort to continue improving the resort facility and grounds, we have consulted with many experts to improve the state of the landscape to the level that is both on or above par with local preservation and conservation efforts, as well as what visitors to the island expect to see. It is our goal to dramatically increase our resort hotel patrons' experience as well as the passersby's experience on this busy bike path juncture. For your information, the other two options considered were:

1. Replacing the existing Bermuda turf in the hope of it succeeding. However, an in-depth site analysis has shown that the current topography has little to no slope and that replacing like with like, would in all certainty, yield the same results.
2. Installing catch basins to collect surface runoff: After having our surveyor shoot the entire rear of the resort property at 1' contour intervals and providing us with numerous hardscape spot elevations, we realized this would not be a practical solution. It also left us with the problem of having nowhere to daylight the storm water to.

Given the site conditions and the sensitive coastal environmental ecosystem, we came up with our current proposed solution that beautifies the resort property, solves our drainage problems, and

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benefits the environment. For three of the buildings, runoff from the roof of the rear of the resort will be treated by being directing into 4" solid PVC conduits at each existing downspout.

This solution will not work for the hotel building located furthest south due to existing downspouts which discharge directly onto sidewalks. For this one building, roof water and surface runoff will be directed into 6" French drainage system adjacent to sidewalk. From there, the storm water will be directed into a modified french drainage system that will act both as a storm water infiltration system for roof water runoff and as a drainage system, in conjunction with 4" lateral french drainage lines, for the lower lying areas of the turf grass. If or when the system reaches full storage capacity, storm water runoff will be directed into one of two bioswales, planted as native grassland habitats, via one of five 6" perforated drain lines. Note: Currently, all but a small amount (quantity plagues us) of runoff drains towards the dunes with no treatment.

Existing struggling common Bermuda turf areas will be upgraded to Platinum TE™ Paspalum (*Paspalum vaginatum*). In consulting with local turf experts, including Lucas Walters (Superintendent at Sea Island Club) and Michael Hardin with Seaside Turf Solutions of Sea Island, GA, we propose to follow their recommendation of Platinum Paspalum as the best sustainable option for our turf renovation project based on its high salt tolerance, tolerance of a wide range of mowing heights, superior high and low light intensity tolerance, and for its ability to crowd out weeds.

The total approximate area of the proposed paspalum sodding, including landward of the Shore Protection Line, is 53,574 sq. ft.

The total approximate area of the proposed paspalum sodding seaward of the Shore Protection Line 17,226 sq. ft.

The total approximate area of the proposed north native grassland bioswale, including landward of the Shore Protection Line, is 2,628 sq. ft.

The total approximate area of the proposed north native grassland bioswale seaward of the Shore Protection Line is 2,628 sq. ft.

The total approximate area of the proposed south native grassland bioswale, including landward of the Shore Protection Line, is 7,539 sq. ft.

The total approximate area of the proposed south native grassland bioswale seaward of the Shore Protection Line is 4,598 sq. ft.

The proposed project access point is through Captain Wyllly Road Path.

The firm we have chosen to perform the work, Seaside Turf Solutions of Sea Island, has deep roots in the golf industry, so installation methods would be similar to those you would expect to see on a golf course, sports field, or similar installation sites where best practices are expected.

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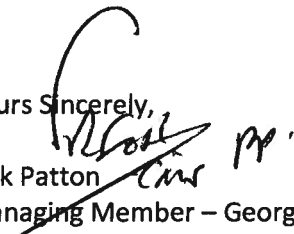
Proposed construction method will be as follows:

1. Critical root zones (CRZ) of all trees to be marked by an ISA Certified Arborist before construction. Any work in the CRZ will be performed by hand.
2. Installation of drainage system in open areas will be performed by walk behind or ride on trencher. Mechanical trenching within the CRZ's of existing protected trees is prohibited. If any pipes or other equipment is necessary within the CRZ, this work shall be performed by hand by tunneling under protected areas with an air spade under supervision of ISA Certified Arborist.
3. Small Kubota tractor and roto-tiller will till up the existing turf.
4. A John Deere Sand Pro and T Series bobcat 300 will smooth and clean up left over debris from the tilling for transport to disposal container.
5. Either a box blade or a T series bobcat with laser level system will be used to smooth the grade to its original contour.
6. Paspalum sod will be installed in rolls with track sod roller machines.
7. Bioswale will be created by using a rubber track skid steer machine.
8. Native grassland habitat will be installed by hand.
9. Sod will be rolled and irrigated
10. Site will be cleaned of debris from all activities

Once commenced and weather permitting, we anticipate that the proposed work will take 30 days to complete.

Georgia Coast Holdings II, LLC has engaged CMS and Associates to provide Owners' Representative services, and we previously submitted a letter to you, dated March 28th, 2017 authorizing CMS to make this application on our behalf. We again attach a copy of this letter for your convenience.

Yours Sincerely,


Rick Patton
Managing Member – Georgia Coast Holdings I, LLC

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Simon Foster

From: Jim Broadwell <jbroadwell@jekyllisland.com>
Sent: Friday, July 14, 2017 8:37 AM
To: Simon Foster
Cc: timwolfedesign@gmail.com
Subject: RE: HIR Drainage and Turf Plan 7.11.2017

Simon ... looks good ... you are approved to move forward.

Have a great weekend.

Jim

Jim Broadwell, Project Manager
The Jekyll Island Authority

Phone: 912.635.4418 | **Cell:** 912.571.6779
Email: jbroadwell@jekyllisland.com



From: Simon Foster [mailto:sfoster@cms-a.net]
Sent: Tuesday, July 11, 2017 4:56 PM
To: Jim Broadwell <jbroadwell@jekyllisland.com>
Cc: timwolfedesign@gmail.com
Subject: FW: HIR Drainage and Turf Plan 7.11.2017
Importance: High

Jim – please see attached our proposed scope of work to introduce bioswales that will substantially improve the drainage on the Holiday Inn Resort site.

Tim, our landscape consultant, has met Cliff, Ben and Skye, from DNR, on site and explained what we planned to do, and all were supportive.

Before we submit to DNR for SPA permit we need to be able to show that JIA has approved the plan.

Hopefully this can be handled expeditiously so that we can get our application to DNR soonest.

Should you have any questions please do not hesitate to contact me

Kind Regards

Simon

Simon Foster

CMS and Associates, LLC
Tel: 404-261-9004
Cell: 678.362.0006
Fax: 404.261.9005

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From: Tim Wolfe [<mailto:timwolfedesign@gmail.com>]
Sent: Tuesday, July 11, 2017 4:17 PM
To: Simon Foster <sfoster@cms-a.net>
Subject: HIR Drainage and Turf Plan 7.11.2017

Simon,

Please see attached drainage and turf plan 7.11.2017 for HIR.

Thanks,

Tim

--
Tim Wolfe



ISA Certified Arborist
SO-7299A

(404) 569-4455
www.timwolfedesign.com

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**Georgia Coast Holdings II, LLC
2795 Peachtree Rd. Unit 2405
Atlanta, GA 30305**

September 19, 2017

Georgia Department of Natural Resources
Coastal Resources Division
Jordan Dodson
One Conservation Way
Brunswick, GA 31520-8686

Re: Application for a Shore Protection Act Permit for Georgia Coast Holdings, LLC

Dear Jordan.

Thank you for your letter dated September 6th – please see below our replies to your questions:

1. Adjoining property owner's names and addresses:
 - a. To North of property
 - a. Georgia Coats Holdings, I, LLV – see attached
 - b. To south of property
 - a. Tortuga Jacks – see attached
2. Having consulted with qualified entities the property does not sit over a landfill or hazardous waste site.
3. Public interest:
 - 3.1 There will be no creation of harm to the dynamic dune field, submerged lands or function of the sand sharing system.
 - 3.2 The granting of a permit and the completion of our project will not unreasonably interfere with the conservation of marine life, wildlife or nay other resources.
 - 3.3 The granting of a permit and the completion of our project will not unreasonably interfere with reasonable access by and recreational use and enjoyment of public properties impacted
4. Hurricane Standards Statement - please see attached letter from Roberts Civil Engineering, dated September 19, 2017.
5. Lease with JIA – I will forward this by separate email as the file is too large to copy and attach to this letter.
6. Not sure what this means – the DNR line is marked and shown on the plan
7. Scaled Drawings:
 - a. See attached three copies, 11" by 17" of project plan – I will email you the file as well
 - b. Total square footage of leased property is 348,881.01

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c. Total square footage of the jurisdictional area on the leased property is
77,906.19

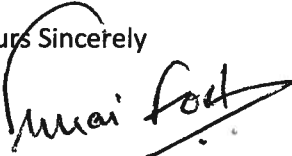
8. No Irrigation will be installed

9. and 10. See attached letters from JIA, dated August 30th, 2017

Having read in detail the Shore Protection Act that you sent to me I believe you now have all that you need to process our application – we would appreciate some idea of when the process will be completed so we can go ahead and line up the necessary resources to carry out the work.

We look forward to hearing from you,

Yours Sincerely

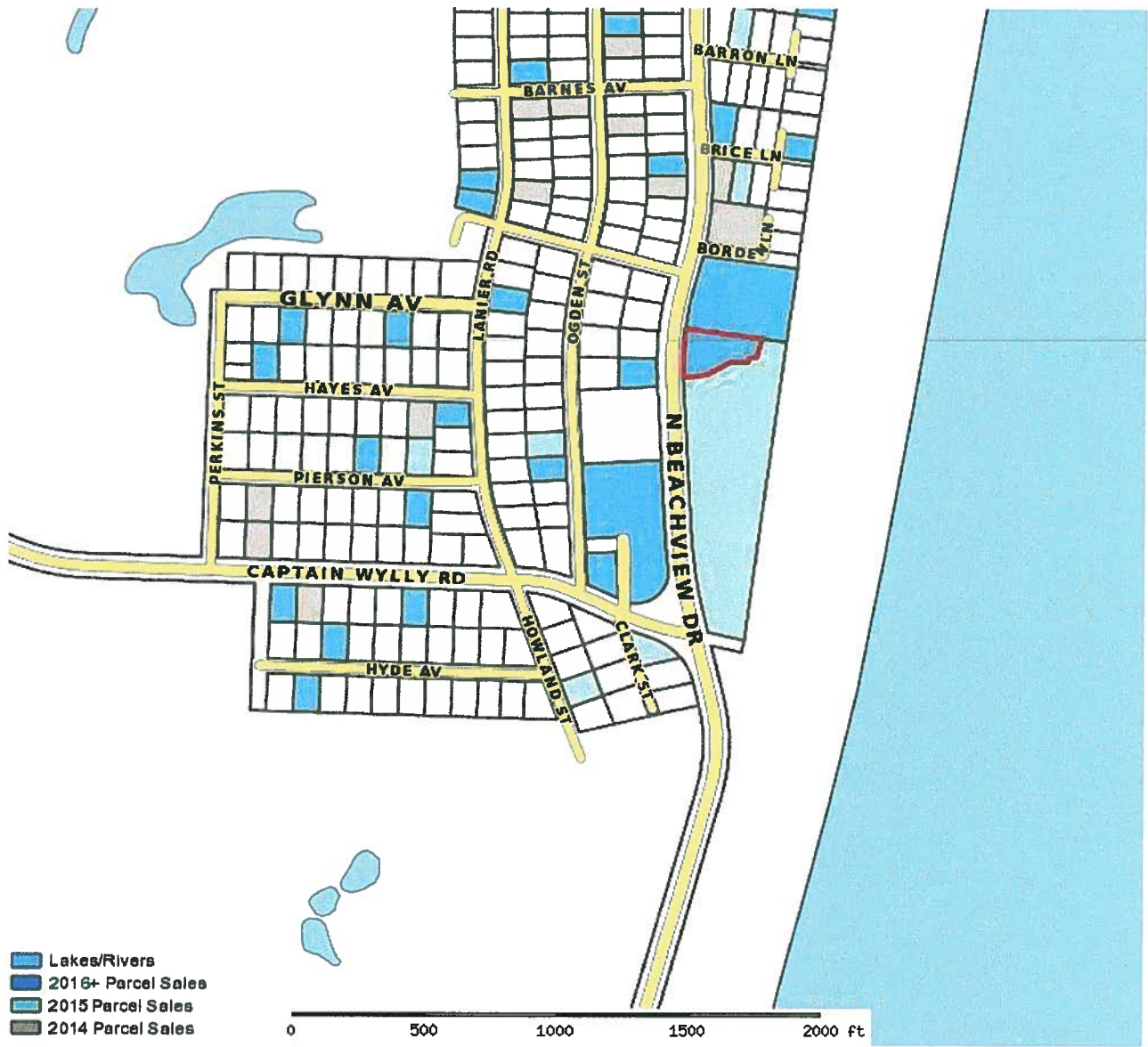
A handwritten signature in black ink, appearing to read "Rick Patton", written over a horizontal line.

Rick Patton
Managing Member, Georgia Coast Holdings II, LLC

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Beachview Restaurant			
Parcel: 06-01056 Acres: 0.92			
Name:	GEORGIA COAST HOLDINGS I LLC	Land Value	\$228,800.00
Site:	15 N BEACHVIEW DR JEKYLL ISLAND 3152	Building Value	\$1,028,400.00
Sale:	\$0 on 03-2016 Reason= Qual=	Misc Value	\$0.00
Mail:	GEORGIA COAST HOLDINGS I LLC 2660 PEACHTREE RD 24H ATLANTA, GA 30305	Total Value:	\$1,257,200.00



The Glynn County Assessor's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. PLEASE NOTE THAT THE PROPERTY APPRAISER MAPS ARE FOR ASSESSMENT PURPOSES ONLY NEITHER GLYNN COUNTY NOR ITS EMPLOYEES ASSUME RESPONSIBILITY FOR ERRORS OR OMISSIONS ---THIS IS NOT A SURVEY---

Date printed: 08/02/17 : 2015
SEP 27 2017



Tortuga Jacks			
Parcel: 06-00433 Acres: 5259.38			
Name:	STATE OF GEORGIA	Land Value	\$99,000,000.0
Site:	2 CLAM CREEK RD JEKYLL ISLAND 31527	Building Value	\$53,384,800.0
Sale:	\$0 on 11-2006 Reason= Qual=	Misc Value	\$0.00
Mail:	STATE OF GEORGIA	Total Value:	\$152,384,800.
	2 MARTIN LUTHER KING JR DR SE		
	1454E		
	ATLANTA, GA 30334		



The Glynn County Assessor's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The assessment information is from the last certified taxroll. All data is subject to change before the next certified taxroll. PLEASE NOTE THAT THE PROPERTY APPRAISER MAPS ARE FOR ASSESSMENT PURPOSES ONLY NEITHER GLYNN COUNTY NOR THE EMPLOYEES ASSUME RESPONSIBILITY FOR ERRORS OR OMISSIONS —THIS IS NOT A SURVEY—

Date printed: 08/22/17 : 16:45:31

SEP 21 2017



301 Sea Island Road Suite 10, St. Simons, GA 31522
912-638-9681 Office 912-289-0339 Fax

September 19, 2017

Simon Foster
CMS and Associates, LLC
30 Lenox Pointe NE Ste B
Atlanta, GA 30324

Mr. Foster:

I have reviewed the landscape plan for the Holiday Inn Resort Hotel prepared by Tim Wolfe Design dated 7/11/17 and it appears to meet hurricane standards because it does not propose any structures.

Sincerely,

Johnathan Roberts, P.E.
Professional Engineer

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VIA ELECTRONIC MAIL ONLY

August 30, 2017

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

RE: Application for a Shore Protection Act (SPA) Permit for Georgia Coast Holdings, LLC, Replacement of Turf; Repair and Replacement of the Turf Irrigation System; Construction of a Bioswale at the Holiday Inn Resort located at 701 Beachview Drive N, Jekyll Island, Atlantic Ocean, Glynn County

To Whom It May Concern:

The purpose of this letter is to address applicable zoning and/or land use requirements of the Jekyll Island-State Park Authority ("JIA") relating to the above-captioned application for a Shore Protection Act Permit by Georgia Coast Holdings, LLC for project at the Holiday Inn Resort on Jekyll Island. The authorizations and permissions set forth herein are hereby granted to Georgia Coast Holdings, LLC, as Lessee under that certain Revised and Restated Hotel Ground Lease, dated April 26, 2013, as amended.

The specific authorizations and permissions, set forth in two parts, are as follows:

**PART I-JEKYLL ISLAND IS PUBLIC PROPERTY
OF THE STATE OF GEORGIA ADMINISTERED BY JIA**

JIA is the statutory lessee of the whole of Jekyll Island, Georgia, and has the requisite statutory authority to act for the State pursuant to O.C.G.A. § 12-3-241, which sets forth the terms of the lease of Jekyll Island, its adjacent marshes and marsh islands, rights of way, and rights and privileges of every kind to the JIA. Specifically, O.C.G.A. § 12-3-241 provides as follows:

- a) To the authority is granted, for and on the part of the State of Georgia, a lease for a term of 99 years, beginning on February 13, 1950, which term shall be automatically extended an additional 40 years upon the ending of the initial term. The lease, shall be for all of that island of the State of Georgia, County of Glynn, being known as Jekyll Island and the marshes and marsh islands adjacent and adjoining the same owned by the State of Georgia; being that island of 11,000 acres, more or less, lying east of the mainland coast of Georgia, County of Glynn, bounded on its easterly shore by the Atlantic Ocean; bounded upon its northerly shore by Brunswick River, bounded on its westerly shore by Brunswick River, Jekyll Creek, Jekyll River, and Jekyll Sound; and bounded on its southerly shore by Jekyll

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Sound, together with the adjacent and adjoining marshes and marsh islands; which properties may also be described as all of the lands acquired by the State of Georgia in a certain condemnation proceeding, State of Georgia vs. Jekyll Island Club, Inc., et al., filed June 6, 1947, in Glynn County Superior Court; which properties may also be described in all conveyances, conveying any and all parts of Jekyll Island and the adjacent and adjoining marshes and marsh islands to the State of Georgia, recorded upon the official deed books of Glynn County as of February 13, 1950, all and each one of said conveyances being, by reference, expressly incorporated into this Code section and made in their entireties a part hereof.

- b) Also included in the lease granted by this Code section are all rights, rights of ways, water rights, immunities, easements, profits, appurtenances, and privileges thereof or relating thereto of every kind; all improvements, permanent or temporary, located thereon or dedicated to the use or service thereof; and in additional personal property or property of any kind of the State of Georgia located thereon or dedicated to the use or service thereof.

JIA has reviewed the plans for the project, and notes that certain elements of the project will be constructed on or near State property administered by JIA that is adjacent and abutting Lessee's leasehold interest. JIA has determined that those elements are appropriate for the location and are reasonably designed to enhance public access to and enjoyment of the public beaches of Jekyll Island with minimal impact upon protected areas.

PART II- PROPOSED ACTIVITIES TO BE CONDUCTED ON THE LEASEHOLD ESTATE

JIA has reviewed the plans for the project, and notes that the remaining elements of the project will be constructed within the bounds of the real property leased to Lessee (the "Leasehold Estate"), under Georgia law as an estate for years and not a usufruct. JIA has determined that those elements (i) are consistent with the designated purposes of the Lease, (ii) are appropriate for the location and (iii) are reasonably designed to enhance the public's experience and enjoyment of the public beaches and amenities of Jekyll Island, within the statutory purposes of JIA, and with minimal impact upon protected areas.

As a matter of further information, zoning on Jekyll Island is governed, in part, by the Jekyll Island Master Plan. This plan specifies areas that can be developed. These areas include:

- Any subdivided or platted parcel (even if not built upon);
- The Historic District, except for marsh edge vegetation; and
- Any of the following, on non-subdivided lands:
 - Built facilities or structures
 - Paved roads, including cleared rights of way Paved bike trails
 - Cleared golf course areas (fairways, greens, tees) Historic sites, if maintained
 - Cleared areas in active use (picnic and parking)

GA DNR

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August 30, 2017

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- Campgrounds with utilities
- Lakes or ponds used for active recreation.

Specific zoning requirements for residential homes on the island are listed in the Jekyll Island-State Park Authority Code of Ordinances and the Jekyll Island State Park Authority Design Guidelines. Zoning for Jekyll Island hotels, such as the Holiday Inn Resort, and other island businesses is specified in their individual leases with the Jekyll Island State-Park Authority. JIA finds that this project does not violate the terms of Holiday Inn Resort's lease or any applicable zoning ordinance or law.

I hope this is helpful. Should you have any additional questions, please do not hesitate to contact me.

Sincerely,



DANIEL J. STROWE
Legal Associate

DJS/

GA DNR

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VIA ELECTRONIC MAIL ONLY

August 30, 2017

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

RE: Application for a Shore Protection Act (SPA) Permit for Georgia Coast Holdings, LLC, Replacement of Turf; Repair and Replacement of the Turf Irrigation System; Construction of a Bioswale at the Holiday Inn Resort located at 701 Beachview Drive N, Jekyll Island, Atlantic Ocean, Glynn County

To Whom It May Concern:

The purpose of this letter is to address applicable zoning and/or land use requirements of the Jekyll Island-State Park Authority ("JIA") relating to the above-captioned application for a Shore Protection Act Permit by Georgia Coast Holdings, LLC for a project at the Holiday Inn Resort on Jekyll Island. The proposed project will be constructed in and around the real property leased to Georgia Coast Holdings, LLC as set forth in that certain Revised and Restated Hotel Ground Lease, dated April 26, 2013, as amended ("Lease Agreement"). JIA has reviewed the plans for the project, attached hereto as Exhibit A, and finds that the proposed project is in compliance with all terms and conditions set forth in the Lease Agreement, and further does not violate any applicable zoning or land use requirements under the JIA Code of Ordinances or Georgia law.

I trust that this letter is responsive to the request of the Georgia Department of Natural Resources. Should you have any questions or need further clarification, please do not hesitate to contact me.

Sincerely,

DANIEL J. STROWE
Legal Associate

DJS/

GA DNR

SEP 21 2017

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Dodson, Jordan

From: Simon Foster <sfoster@cms-a.net>
Sent: Thursday, January 18, 2018 3:03 PM
To: Dodson, Jordan
Cc: Burgess, Karl; Noble, Josh; Tim Wolfe; Rick Patton; Robert Symonds
Subject: FW: Beachview Club Hotel and Holiday Inn Resort SPA Application
Attachments: Calculations 01.12.2018.pdf; CMS - Jekyll - Beachview - Area Calculations - Revised for DNR 1.16.2018.pdf

Importance: High

CAUTION: This email 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 Jordan – thanks for your time last Friday – our landscape architect has double checked and see his revised calculations which now do tie up with yours – thanks for pointing this out.

See our statement regarding irrigation below – hopefully this clarifies our position and gives you what you need.

Finally see our statement below for the Holiday Inn Resort that does confirm that this application modifies our existing permit.

Let me know if you have any questions – as I understand it the next step will be the Public Advertisement and if this all goes well, as we hope it will, we should have both of these on the agenda for the March 30th meeting – please confirm – we will have representation at that meeting

Kind Regards

Simon

Simon Foster

CMS and Associates

Tel: 404-261-9004

Fax: 404-261-9005

Cell: 678-362-0006

From: Dodson, Jordan [mailto:jordan.dodson@dnr.ga.gov]
Sent: Friday, January 12, 2018 4:22 PM
To: Simon Foster <sfoster@cms-a.net>
Cc: Burgess, Karl <Karl.Burgess@dnr.ga.gov>; Noble, Josh <Josh.Noble@dnr.ga.gov>
Subject: Beachview Club Hotel and Holiday Inn Resort SPA Application

Hi Simon,

As discussed over the phone this afternoon, I just wanted to touch base on the status of the two pending applications you have with us. We are trying to streamline these projects for our upcoming meeting, which is tentatively set for March 30, 2018. If we were to put these two projects on Public Notice this month, more than likely these projects will hit that agenda. There are just a few things that need to be clarified with each application in order to move forward with the Public Notices (see below).

Beachview Club Hotel (Georgia Coast Holdings II, LLC)

1. Is there any existing irrigation within the SPA jurisdiction?
 - a. If there is, will this irrigation be replaced?

b. If there is not, will irrigation be installed?

There is an existing irrigation system in the existing SPA jurisdiction. It is operational and is in need of some minor adjustments and routine maintenance to service the proposed St Augustine turf areas.

2. The totaled amounts for the project components for ON and OFF leased property are not matching the numbers provided for the "Total of SPA Jurisdictional Area of Proposed Project ON Leased Property" and "Total of SPA Jurisdictional Area of Proposed Project OFF Leased Property." Please revise.

a. I have attached our calculations to demonstrate.

See attachment above

Holiday Inn Resort (Georgia Coast Holdings, LLC)

1. There is currently an active permit for this site, SPA#425. The activities as proposed constitute as a modification to the existing active permit (SPA#425), please provide a statement that the existing proposal is a modification to permit SPA#425. This is simply to best document our files for this site.

We would confirm that the existing proposal is a modification of SPA#425

If you have any questions or concerns, please let me know.

Have a great weekend,

Jordan Dodson

Coastal Permit Coordinator

Coastal Resources Division

(912) 262-3109 | M: (912) 266-0642

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GEORGIA DEPARTMENT OF NATURAL RESOURCES

File: SPA20170015 and SPA20170016