

**IN THE SUPERIOR COURT OF GLYNN COUNTY  
STATE OF GEORGIA**

CENTER FOR A SUSTAINABLE  
COAST and JEFF KILGORE,

Plaintiffs,

v.

GLYNN COUNTY, GEORGIA, a  
political subdivision of the State of  
Georgia and COMMISSIONERS,  
SAMMY TOSTENSEN, CAP  
FENDIG, WAYNE NEAL, BILL  
BRUNSON, ALLEN BOOKER,  
DAVID O'QUINN, WALTER  
RAFOLKSI, Individually, in their  
official capacities, and CHURCH  
WARDENS AND VESTRYMEN OF  
THE EPISCOPAL CHURCH OF THE  
TOWN OF FEDERICA, CALLED  
CHRIST CHURCH.

Defendants.

CASE NO.  
CE21-01136

**Amended Complaint for Injunctive Relief and Nominal Damages**

Plaintiffs Center for a Sustainable Coast ("CSC") and Jeff Kilgore hereby file this amended complaint challenging Glynn County's financial assistance to a church, and expenditures of taxpayer funds in order to advance a church's religious mission, in violation of the Establishment Clause of the First Amendment to the U.S. Constitution.

## **Parties, Jurisdiction, and Venue**

1.

Plaintiff Center for a Sustainable Coast (“CSC”) is a Georgia domestic non-profit 501(c)(3) corporation dedicated to ensuring the responsible use, protection, and conservation of coastal Georgia's natural, scenic, historic, and economic resources.

2.

Jeff Kilgore is a member of CSC and a Glynn County resident and taxpayer who has an interest in the faithful execution of the law in Glynn County and who objects to the use of his tax payments to support a religious institution.

3.

Glynn County, Georgia is a political subdivision of the State that has at all relevant times acted under color of state law. As relevant to this complaint, Glynn County has primarily operated through its Board of Commissioners.

4.

The individually named County Commissioners are members of the Glynn County Board of Commissioners, which is the County's governing authority. The Commissioners have at all relevant times acted on behalf of Glynn County, with final decision-making authority under state law.

5.

The County and its Board of Commissioners have the authority to stop work on the road realignment project complained of herein, to cease expending taxpayer funds in furtherance of the project, and to halt the use of County resources and employee time in furtherance of the project.

6.

Church Wardens and Vestrymen of the Episcopal Church of the Town of Federica, Called Christ Church, ("Christ Church") is a Georgia domestic non-profit corporation.

7.

Plaintiffs bring this action under 42 U.S.C. §1983 to preserve the constitutional rights of the individual plaintiff and the organizational plaintiff's members, whose rights are being deprived under the color of state law by the Defendants. This Court has jurisdiction under 42 U.S.C. § 1983. Defendants are subject to the venue of this Court under GA CONST, Art. 6, § 2 ¶ III; and O.C.G.A. §§ 9-10-30.

**Count 1 - Violation of the United States Constitution**

8.

Financial assistance from the government to a religious organization violates the Establishment Clause of the First Amendment to the U.S. Constitution when such assistance is made in order to further

the organization's religious mission. (U.S. Const. amend. I; U.S. Const. amend. XIV).

9.

Defendant Christ Church has undertaken a master planning process to ensure that the Church is "properly situated to capitalize on opportunities for increased mission and ministry." (CCF Master Plan Field Guide, Exhibit A at 6 ("Campaign Components")).

10.

Christ Church explained that its governing board "began considering how Christ Church could best respond to God's call to serve our community and make room for a growing congregation and its mission." (CCF Frequently Asked Questions, Exhibit B).

11.

As one component of its "Master Plan," Christ Church concluded that shifting Frederica Road will allow for parking that doesn't require crossing the road, and allow for space to expand its facilities and capacity for ministry, which will advance its religious mission. (CCF Frequently Asked Questions, Exhibit B).

12.

Christ Church's Master Plan calls for an expanded space that will include a new sanctuary that "allows service sizes to expand substantially" and "more parishioners and worshipers to come together



and celebrate the Word.” (2017 Executive Summary Conceptual Plan, Exhibit C).

13.

In order to advance its Master Plan, Christ Church has requested that Glynn County shift a portion of Frederica Road on St. Simons Island away from the Church.

14.

Christ Church owned property on the other side of Frederica Road and proposed that it exchange parcels with Glynn County.

15.

Christ Church acknowledged the land exchange “was required for the road to be shifted.”

16.

Glynn County agreed to this land exchange in order to assist Christ Church in carrying out the church’s Master Plan.

17.

Glynn County agreed to this land exchange in order to assist Christ Church in advancing its religious mission.

### **The Land Exchange**

18.

On July 6, 2021, Christ Church and Glynn County exchanged tracts of real property.

19.

Christ Church conveyed 3.043 acres to Glynn County. (Deed Book 4493, pages 273-277, Exhibit D).

20.

Glynn County conveyed 2.98 acres to Christ Church. (Deed Book 4493, pages 273-277, Exhibit E).

21.

Glynn County conveyed approximately 2.95 acres of uplands to Christ Church.

22.

Christ Church conveyed approximately 1.25 acres of uplands to Glynn County.

23.

Glynn County and Christ Church claimed that the tracts exchanged were of equal value, but Glynn County conveyed property of greater value than it acquired.

24.

To justify their claim that the two exchanged tracts were of equal value, Glynn County and Christ Church relied on an appraisal that calculated the same value per acre for uplands and wetlands.

25.

The appraisal's calculations were based on a math error.

26.

Usable land is more valuable than non-usable land and uplands are more valuable than wetlands.

27.

The appraisal relied on five “comparable sales.”

28.

The gross acreage for Comparable Sales # 1-3 ranged from 35.44 acres – 38.2 acres.

29.

Comparable Sales # 1-3 each had 8.41 acres of uplands – which the appraisal referred to as the “Usable Land Size.”

30.

But for each of these sales, the appraisal used 8.41 acres as the “Usable Land Size” *and* the “Gross Land Size.”

31.

Because of this error, the sale price per usable acre and sale price per gross acre were mistakenly identified as the same values (\$65,398 per acre (#1), \$63,258 per acre (# 2), and \$68,965 per acre (# 3)).

32.

Comparable Sale # 4 — calculated at \$915,625 per usable acre — was not comparable.

33.

Comparable Sale # 5 was calculated correctly.

34.

Comparable Sale # 5 was 39.09 acres.

35.

Comparable Sale # 5 included 8.41 acres of uplands – which the appraisal refers to as “Usable Land Size.”

36.

For Comparable Sale # 5, the appraisal calculated the sale price per usable acre as \$63,258 and the sale price per gross acre as \$13,610.

37.

By relying on objectively wrong calculations for Comparable Sales # 1-3, the appraisal failed to distinguish between the value of uplands and the value of wetlands.

38.

The appraisal then applied those errors to the subject properties.

39.

In applying those errors to the subject properties, the appraisal calculated a market value of \$225,000 for the 2.98-acre tract conveyed to Christ Church (with approximately 2.95 acres of uplands) and calculated a market value of \$225,000 for the 3.043-acre tract conveyed to Glynn County (with approximately 1.25 acres of uplands).

40.

Valuing these tracts without distinguishing between uplands and wetlands was objectively unreasonable.

41.

Glynn County provided Christ Church with a financial benefit by conveying property containing approximately 2.98 acres of uplands to Christ Church in exchange for property containing only 1.25 acres of uplands.

42.

Glynn County conveyed property that expanded Christ Church's contiguous land on the southwest side of Frederica Road. Glynn County has a temporary easement for traffic across the parcel conveyed to Christ Church until the realigned road is open to the public.

43.

Glynn County acquired property for the new portion of Frederica Road.

44.

Before the land exchange, the parcel where the new road is to be built was deed restricted requiring its use "for church purposes or otherwise left undeveloped." In the Church's Frequently Asked Questions, the Church stated that "the nature of the exchange ensures that the land is being used for the benefit of Christ Church to...allow for

program and ministry growth...” (CCF Frequently Asked Questions, Exhibit B).

45.

The land exchange has the effect of aiding and advancing religion.

46.

By exchanging these tracts of property, Glynn County provides financial aid to Christ Church in violation of the First Amendment’s Establishment Clause. (U.S. Const. amend. I).

**Additional Expenditures and Benefits Provided to Christ Church through the Road Realignment Project**

47.

Glynn County is providing other financial aid and unique benefits to Christ Church by using the time and resources of County personnel in furtherance of Christ Church’s Master Plan.

48.

Glynn County is using the time and resources of County officials to shift Frederica Road away from the Church (the “Road Realignment Project”). The project has taken, and continues to take, the time and attention of the County’s Board of Commissioners, a County Attorney, the Director of the County’s Public Works Department, (*see* County PCN Application, App’x F, Exhibit G), a County engineer, a grant writer for the County’s Federal Land Access Program application, and other County administrative personnel.

49.

Glynn County's use of County personnel to advance the Road Realignment Project has involved the expenditure of taxpayer funds.

50.

Glynn County decided to pursue the Road Realignment Project for the primary purpose of aiding Christ Church in its Master Plan.

51.

Glynn County decided to pursue the Road Realignment Project without first performing a traffic study or associated accident analysis to determine whether there was a safety problem with Frederica Road as it existed prior to the project. Over a recent five-year period, from January 2014 to September 2019, there was only one reported accident in the project area, and that accident did not result from a deficiency that this project would fix. (*See* Buckholz Aff. ¶¶ 5–7, Exhibit F).

52.

The Road Realignment Project does not help to preserve the historical assets in and around the project site. Rather, the portion of Frederica Road that will be removed has been recognized for its historic significance.

53.

In addition to the expenditure of County resources to complete the Road Realignment Project, Glynn County also provided Christ Church

with unique aid—the County’s identity as a government entity—so that the Church could circumvent the normal requirements for a private entity to get approval to fill wetlands. (See County PCN Application, App’x F, Exhibit G).

54.

The Clean Water Act requires a permit from the U.S. Army Corps of Engineers to fill wetlands.

55.

The Corps of Engineers allows up to one-half acre of wetlands to be filled for linear transportation projects under a streamlined general permit process that doesn’t require public notice and opportunity for comment, and that doesn’t require the Corps to determine whether the impacts are avoidable.

56.

The Frederica Road Realignment Project will fill more than one-half acre of wetlands.

57.

The Corps of Engineers allows up ten acres of wetlands to be filled under a similar streamlined general permit process for linear transportation projects funded by the government.



58.

Glynn County notified the Corps of Engineers that the Frederica Road Realignment Project is funded by the County government. (*See* County PCN Application, App'x F, Exhibit G).

59.

Based on Glynn County's representation that it was funding the project, the Corps of Engineers authorized the wetlands to be filled under the streamlined general permit for government-funded projects.

**Glynn County Has Violated Plaintiffs' First Amendment Rights**

60.

By undertaking the Frederica Road Realignment Project and the land exchange, Glynn County has provided, and continues to provide, financial aid to Christ Church in violation of the First Amendment's Establishment Clause. (U.S. Const. amend. I).

61.

By undertaking and advancing the Frederica Road Realignment Project, and through the land exchange, Glynn County conveys an impermissible message of government endorsement of religious belief and of Christ Church's religious mission.

The Frederica Road Realignment Project and the land exchange have the primary effect of aiding and advancing Christ Church's religious mission.

**WHEREFORE**, Plaintiffs request that:

- (a) This Court grant injunctive relief to prevent the Defendants from performing further work on the Frederica Road Realignment Project.
- (b) This Court grant equitable relief invalidating and voiding the land exchange between Defendant Glynn County and Defendant Christ Church (Deed Book 4493, pages 268-272 and Deed Book 4493, pages 273-277).
- (c) This Court grant judgment against Defendant Glynn County awarding each plaintiff nominal damages for the violation of their constitutional rights.
- (d) This Court award attorneys' fees and litigation expenses to Plaintiffs under 42 U.S.C. § 1988.
- (e) This Court award such other equitable relief as it deems just.

Respectfully submitted this January 31, 2022.

/s/ Jon Schwartz

Jon Schwartz

Georgia Bar No. 631038

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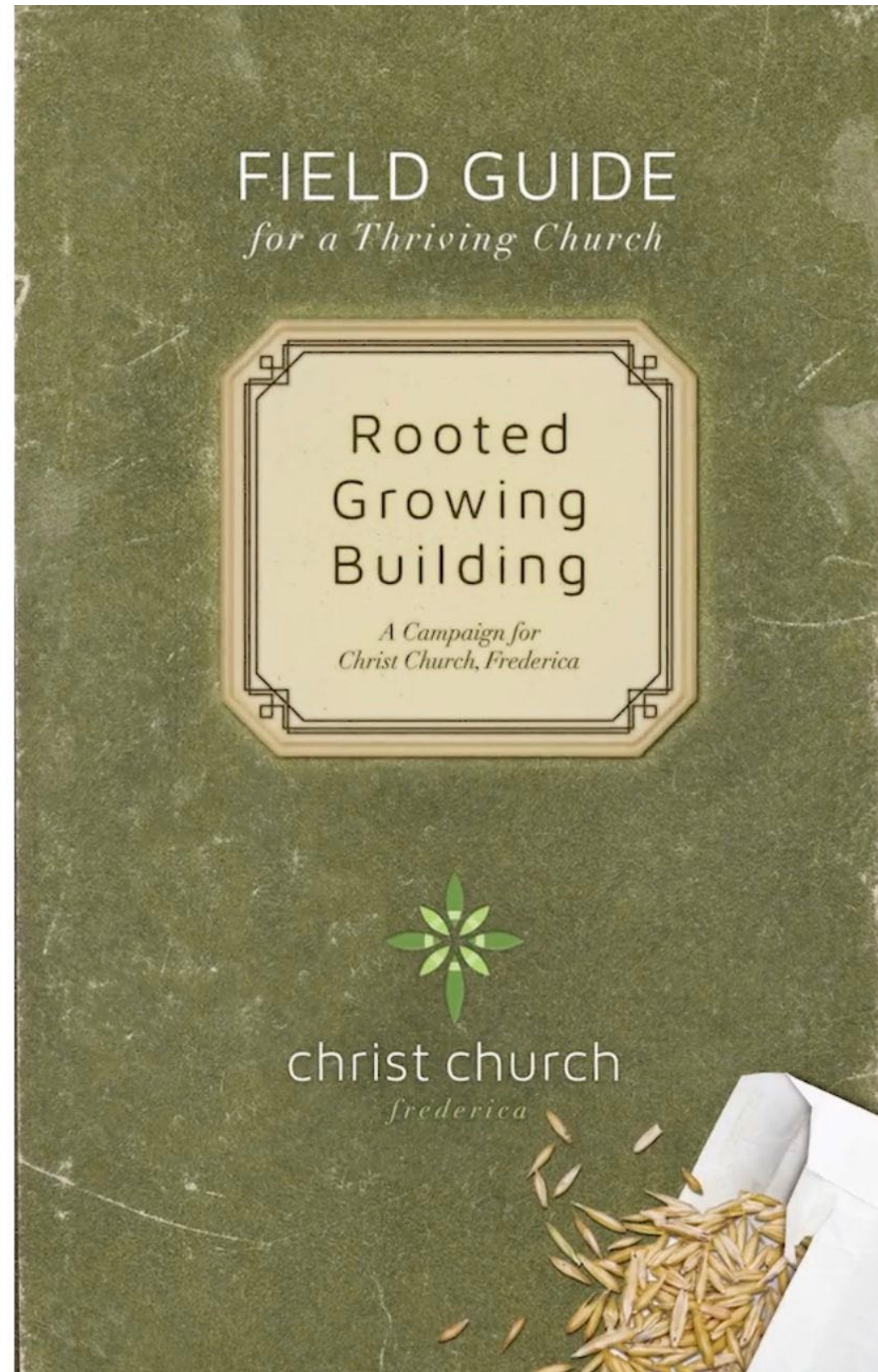
Samuel T. Grover

FREEDOM FROM RELIGION FOUNDATION, INC.

P. O. Box 750, Madison, WI 53701

Telephone: 608-256-8900

*Attorneys for Plaintiffs Center for a Sustainable Coast and Jeffrey Kilgore*





## Greetings from the Rector

*A growing church, rooted in  
faith, building for the future.*

*Christ Church, Frederica, with its roots more than 280 years deep on St. Simons Island, is an Episcopal Church with an unwavering mission. As a parish church, Christ Church is a symbol of faithfulness and commitment to the Gospel of Jesus Christ. Our history demonstrates that generational effort and witness over time can shape a community and a people through love, service, worship, and outreach.*

Dear Friends,

All who come to Christ Church walk in the footsteps of saints and stewards who came before us. From our colonial period when new trails were literally being blazed through this island's wilderness to our 21st Century ministry broadcast to all corners of this world, all of our collective effort has been directed to spreading the Good News of God in Christ Jesus. Those who answered God's call, shared God's vision, and worked to bring it to fruition in previous eras, blessed us with a holy place, a sacred trust, and commission to continue the work begun. We are *rooted* in faith.

Each subsequent generation at Christ Church has had to listen faithfully for God's call to further the mission of this place and its people and ours is no different. We are a *growing* church. This campaign is the first step in what the Vestry and the congregation has heard as today's calling to expand our capacity for ministry and accommodate that growth.

I hope that through this campaign you will treasure what we have been given and be inspired to take part in this generation's bold and faithful efforts as we set the stage for another century of holy work by *building* for tomorrow.

Yours in Christ,

*Tom*  
Rev. Tom Purdy





# Rooted in Faith: *Our History*



*Stained glass depicting Rev. Charles Wesley preaching under the oaks at Fort Frederica, cir. 1736.*

When The Rev. Charles Wesley stepped onto St. Simons in 1736, none of the party that came ashore to establish Fort Frederica had an awareness of how their efforts would shape the future. It's quite certain none of them knew that their Anglican chaplain and his brother would go on to shape the Christian Church itself. Although Charles Wesley's preaching under the oaks at Frederica didn't endure for long, his ministry planted seeds that still bear fruit today.

Ministry on St. Simons continued as others picked up the mantle for themselves, making sure that Word and Sacrament was available to the people who lived here. Various challenges and wars prevented the construction of a church for nearly 100 years, but after its

1808 Founding, Christ Church's first building was constructed in 1820. The decades and generations of effort by the small Anglican population on St. Simons had birthed a congregation that continues its ministry over 200 years later.

Christ Church endured the challenges of the 19th Century, most notably its near destruction during the Civil War, as a result of the faithful vision and effort of her people. Clergy and lay leaders alike made sure the Anglican message of God's love was shared. That meant that when Anson G.P. Dodge, II arrived on St. Simons in 1879 he found the congregation meeting in a home once again. Anson began his training for the priesthood that year with a vision to return and rebuild Christ

Church, which he did, completing the construction in 1886, one year after his ordination. He also built St. Ignatius Church that same year, which would later become a chapel of Christ Church.

In the years since, The Rev. Anson Dodge's vision has been affirmed over and over again as the congregation steadily grew along with the Island's population. Much has transpired in those years. The Island's people have endured a Depression, wars, hurricanes, and so much more, yet were always comforted and inspired by the ministry of Christ Church and her people. Physical growth has come in stages through various Parish House facilities and expansions. No one knows how today's vision will shape the future, yet we still faithfully plant seeds and continue the work set in motion so many years ago.



*Ruins of the original church following the Civil War.*



*View from the West of the newly rebuilt Christ Church Frederica, cir. 1885.*



## A Growing Church: *Our Ministry*



*The Blessing of the Backpacks  
in the historic Church.*

*I will send  
you rain in its  
season, and the  
ground will  
yield its crops  
and the trees  
their fruit.  
-Leviticus 26:4*



Christ Church's historic sanctuary hasn't changed much since 1886, yet little else has remained so static. St. Simons is a very different community as tourism and development reshape our quiet island. Thousands of persons now call this island "home." From the days when Christ Church met in private residences, numbering its members in the dozens, we now have over 900 members with more than a third of those in attendance at services each week.

As Christ Church has grown in number and mission over the decades, the core of our ministry has always been centered on worship, particularly Anglican liturgical worship, and formation. It is from this steady stream of Word and Sacrament that we inspire worshipers to put their faith into action out in the world. The spiritual sustenance of Islanders in this regard has had a palpable effect.

In recent decades alone Christ Church parishioners have played leading roles in efforts like the creation of Glynn County's Court Appointed Special Advocate (CASA)



services, The International Seafarer's Center in Brunswick, the creation of the St. Simons Land Trust, the Communities of Coastal Georgia Foundation, and many more. The impact Christ Church continues to have in the world is directly related to our ability to gather people for worship and formation. We help kids and adults deepen their faith to carry on our sacred mission.



*Members of our congregation are deeply committed to sowing  
the seeds of their faith through our many programs focused on  
community outreach.*

*The seed that  
fall among  
thorns stands  
for those who  
hear, but as  
they go on  
their way they  
are choked by  
life's worries,  
riches and  
pleasures,  
and they do  
not mature  
-Luke 8:14*



## Building for the Future:

### *Why We Need to Build*



*The crowded Parish Hall at Christmas time.*

Christ Church's leaders have done all they could to balance the preservation of the historic beauty of our spaces and grounds

with the modern needs of a growing congregation. As far back as 1933 we added more space to the church building itself, and there have been three different configurations of program space, each

one getting successively larger with the most recent Parish Hall building expansion completed in 2000. Once again, space has become a constraining factor in our mission.



*As our Christ Church family grows, so, too, does our need for additional program space.*

## One Campaign in Three Parts

Our **Rooted. Growing. Building.** campaign will provide for Christ Church today and in the future.

There are three components to the campaign: the 2020 Annual Campaign, a Capital Campaign, and the launch of the Dodge Society for Legacy gifts. All three enable the health and vitality of Christ Church and the fulfillment of our mission now, and for future generations. Each is a component of whole-life stewardship that responds faithfully to God's call.

**ANNUAL GIVING** Annual giving invites gifts to fund the day-to-day mission and ministry of Christ Church. Funds support parish life, from administrative costs to Sunday School. We have history of increasing our annual giving as our ministry has expanded. It is vital that we do so again during this capital expansion so that our ministries continue to thrive.

**CAPITAL GIVING** When parish churches must expand their facilities to meet current needs and plan for the future, funding such projects is not done through annual giving. Capital campaigns invite additional gifts to help make such occasional expansions possible. Capital campaigns can also be used to grow endowments, buy property, or renovate older spaces. If we think of annual campaigns as the giving that helps churches "go," capital giving is what lets us "grow." Capital campaign giving is extraordinary giving and typically involves accessing funds beyond a person's normal cash flow.

**LEGACY GIVING** Legacy giving is often our final act of stewardship. Such gifts are often conveyed through estate planning, wills, or other instruments at the end of our lives. Legacy gifts are the most selfless form of giving as we will not be around to enjoy the fruits of such gifts. Instead we are helping ensure that the churches and institutions we love can fulfill their missions long after we are gone. Legacy gifts can be unrestricted or designated for specific purposes. The Dodge Society has been created to receive and recognize legacy gifts at Christ Church.



# Campaign Components

The capital portion of this campaign is Phase One of a larger Master Plan to address campus needs as our congregation grows so that we are properly situated to capitalize on opportunities for increased mission and ministry.

There are three main components of the campaign, each of which addresses strategic needs that Christ Church has identified.

## Frederica Road Shift \$450,000

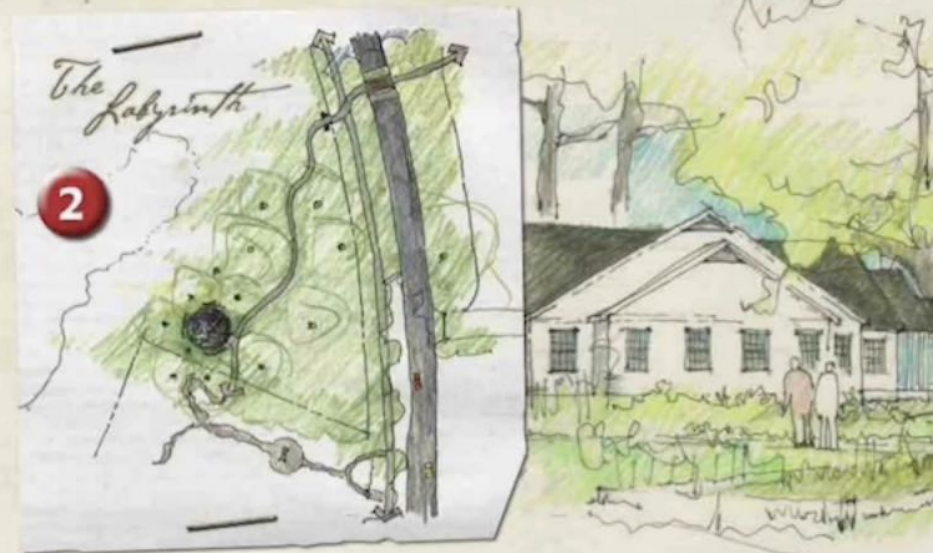
Frederica Road will shift to the east/northeast between Stevens Rd. and the Wesley Memorial Garden. This will be accomplished through a land swap with Glynn County using land we own to the north of Frederica Road. Glynn County has received federal funding to cover 59% of the total cost of the project through a partnership with Christ Church and Fort Frederica. Christ Church is making up approximately \$450,000 of the remaining cost. Shifting the road will give us the room we need to create a safe parking area, eliminating the need to park alongside or cross Frederica Road.

1

## New Construction and Renovation \$4,270,000

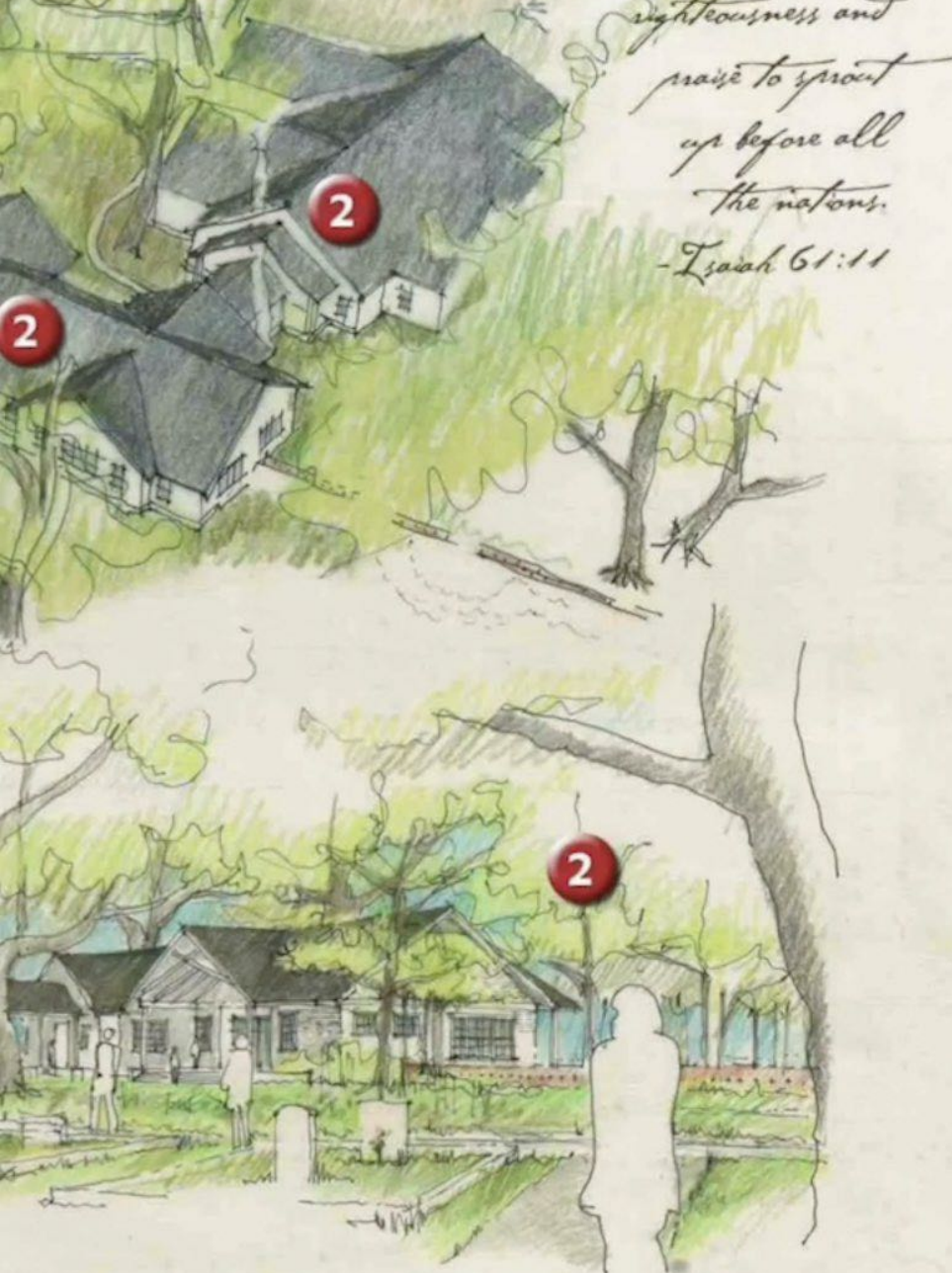
We will create program and parish life space in Phase One through new construction in front of the existing Parish House. This space will house our Welcome Center, public restrooms, and staff offices. The space in the existing Parish House, unused after moving the offices, will be renovated, creating new space for youth and children's programming and adult formation. Other rooms in the Parish House will be re-designated, giving each grade level a larger classroom and making additional space for adult formation and program storage. This figure also includes all the sitework for construction and parking as well as new furnishings. A small part of this component includes an outdoor prayer labyrinth to the north of Frederica Road, already gifted by parishioners.

2

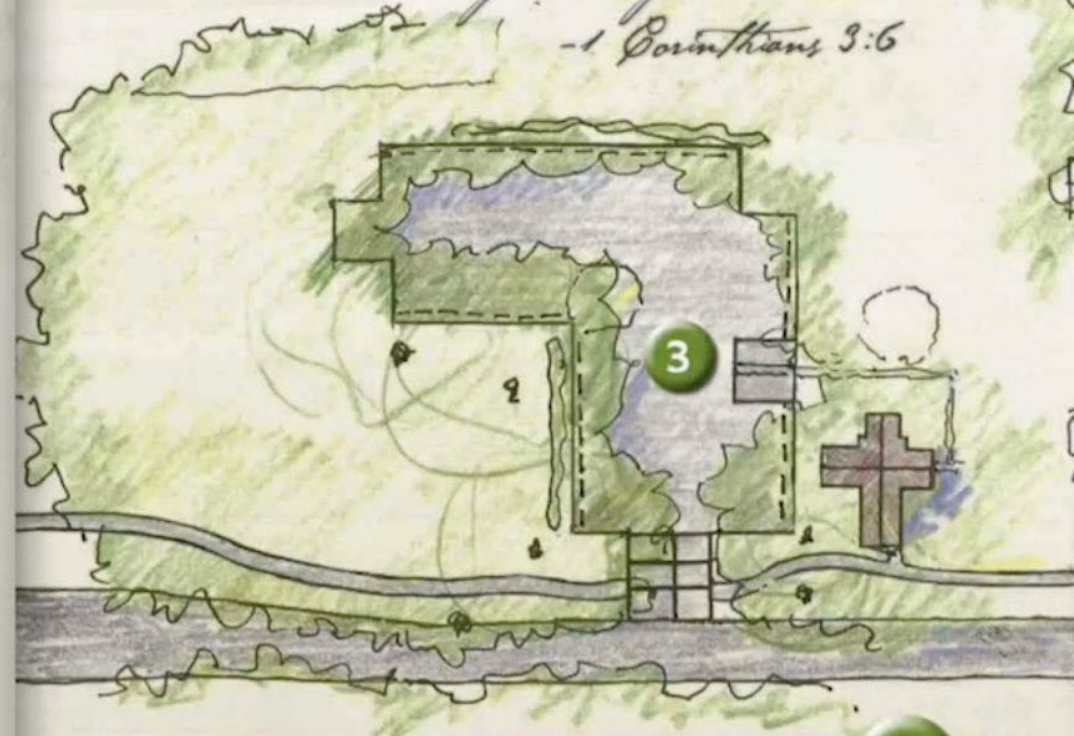




*For as the earth brings forth its  
sprouts, and as a garden causes  
what is sown in it to sprout up,  
so the Lord GOD will cause  
righteousness and  
peace to sprout  
up before all  
the nations.  
- Isaiah 61:11*



*I slanted, & propped watered, but God  
gave the growth.  
- 1 Corinthians 3:6*



### **Parking Lot Repairs at St. Ignatius \$80,000**

While much of the Master Plan's ideas for St. Ignatius have been deferred to a later phase, the parking lot requires immediate attention. The parking area will be re-graded to address drainage issues. Additional sitework will be done as needed to keep the areas around the parking lot looking presentable.

There are other costs associated with these projects, totaling \$1,500,000, which covers professional fees for architecture, engineering, construction and project management, and fundraising consulting. In addition we estimate the cost to borrow money for this project at \$900,000 over the course of the project.





## Campaign Financial Summary

**ANNUAL GIVING** – The goal of the 2020 annual financial stewardship effort is to raise approximately \$1,000,000 in pledged and non-pledged income toward our total 2020 budget of \$1.32 million (which represents an approximate 2.5% increase over 2019). We have a history of increasing our annual giving as our ministry has grown.

**CAPITAL GIVING** – The purpose of the capital campaign is to raise an additional \$6 million, total over five years, to make Vestry-recommended \$7.2 million-worth of physical improvements to the church campus. The Vestry has identified a number of options to retire the \$1.2 million remaining after a successful capital campaign.

**\$ 450,000 Frederica Road Shift**

**\$ 4,270,000 Construction and Renovation**

- Parish House Renovation and New Admin Building
- Sitework at CCF including Parking
- Labyrinth
- Furnishings, Fixtures, Equipment
- Owner's Contingency and Builder Risk

**\$ 80,000 St Ignatius Parking**

**\$ 1,500,000 Professional Fees**

- Design and Construction (\$1.4m)
- Fundraising Counsel

**\$ 900,000 Cost to Borrow**

**\$ 7,200,000 TOTAL**

**LEGACY GIVING** – The purpose of the Legacy Gift component is to identify and raise money for Christ Church, Frederica's endowment.

*It is like a mustard seed, which a man took and planted in his garden. It grew and became a tree, and the birds perched in its branches.*  
- Luke 13:9



## Faithful Leadership

### RECTOR

The Reverend Tom Purdy

### VESTRY

Wallace Harrell - 2020

Senior Warden

Alice Barlow - 2020

Junior Warden

David Blatchford - 2022

Kelly Galland - 2020

Rip Graham - 2021

Chris Jordan - 2022

John Killgallon - 2020

Ellen Kuehm - 2021

Bascom Murrah - 2022

Tisa O'Cain - 2021

Christine Plank - 2022

Julianne Temple - 2021

Bonney Shuman

Treasurer

Mary Helen Moses

Secretary



### CAMPAIGN CHAIRS

Beryl Blatchford

Susan Shipman

Bonney Shuman

### STEERING COMMITTEE

Alice Barlow

Greer Brown

Skip Hilsman

Steve Holt

Susan Imhoff

John Killgallon

Ellen Kuehm

Tony Kreimborg

Beth Smith

Rees Sumerford

Julianne Temple

### BUILDING COMMITTEE

Rip Graham, Chair

Alice Barlow

Beryl Blatchford

Wallace Harrell

Tony Kreimborg

Sandy Rice

Susan Shipman

Nancy Stoddard

Rees Sumerford

### PROJECT MANAGER

Marquis Latimer +Halback,

St. Augustine, FL

### ARCHITECT

Houser Walker Architecture,

Atlanta, GA

### FUNDRAISING COUNSEL

Sinclair, Townes & Company

Atlanta, Georgia

### CONSTRUCTION MANAGER

Batson Cook, Atlanta, GA





## The Dodge Society

### A SACRED DEPOSIT

We are inaugurating a legacy giving program at Christ Church named the Dodge Society. The Rev. Anson Dodge shared a vision with his first wife, Ellen Dodge, and a mission with his second wife, Anna Gould Dodge. Together, their shared vision for a church and its mission has provided a lasting legacy. Building and endowing churches like ours serves as a fitting example that all of us can strive to follow.

Anson likely learned about such stewardship through the example of his great-grandfather, Anson Green Phelps. The elder Anson left a sum of money to his grandchildren so that they could, "spread the gospel, and...promote the Redeemer's kingdom on earth," in the hope that his descendants would receive the gift as a "sacred deposit" with which they could be "faithful stewards...devoted to the same object." Each of us is given the same opportunity to convey our blessings to future generations for the spread of God's kingdom.

Anyone who communicates that he or she has made a legacy gift to Christ Church will become a member of the Dodge Society. Legacy gift pledges recorded before the end of 2021 will constitute founding members of the society and will always be recognized as such. The Dodge Society will offer periodic special events for members and recognition of members in perpetuity.

*"...That each of my said grand-children shall consider the said bequest as a sacred deposit, committed to their trust, to be invested by each grand-child, and the income derived therefrom to be devoted to spread the gospel, and to promote the Redeemer's kingdom on earth, hoping and trusting that the God of Heaven will give to each of that wisdom which is from above, and incline them to be faithful stewards, and transmit the same to their descendants, to be sacredly devoted to the same object."*

*—Anson Green Phelps, in his Last Will and Testament to his descendants.*

## Annual Budget Summary

In 2020 we anticipate an operating budget of \$1.32 million. The summary below shows how we expect those monies to be spent on each area of ministry.

Administration:	<b>\$265,000</b> (20%)
Worship:	<b>\$263,000</b> (20%)
Buildings and Grounds:	<b>\$254,000</b> (19%)
Education and Youth:	<b>\$169,000</b> (13%)
Pastoral Care and Fellowship	<b>\$141,000</b> (11%)
Diocesan Pledge:	<b>\$124,000</b> (9%)
Mission and Outreach:	<b>\$109,000</b> (8%)*

\*Does not include ECW or special appeals

*Honor the Lord with  
your wealth and with  
the first fruits of  
all your produce.  
—Proverbs 3:9*



*Then he took of the seed  
of the land and  
planted it in  
fertile soil.  
He placed it  
beside abundant waters. He  
set it like a willow twig.  
—Ezekiel 17:5*



## Campaign Q&A



### 1. WHO INITIATED AND PLANNED THIS CAMPAIGN?

Christ Church's Vestry planned and organized this campaign after utilizing a consultant to gather information on the desirability and funding feasibility of the larger Master Plan. After careful deliberation, the Vestry unanimously agreed to launch a capital campaign to finance Phase One of the Master Plan.

### 2. WHAT ARE THE OBJECTIVES OF THE CAMPAIGN?

Christ Church will raise \$6 million total over five years, over and above what is raised for the annual operating budget to fund the campaign components in Phase One listed on the previous two pages. We will also use the campaign to identify and secure legacy gifts that will bless the parish for many years.

### 3. WHO WILL BE ASKED TO SUPPORT THE CAMPAIGN?

Christ Church's Vestry, Staff, Campaign Steering Committee, and parishioners will be asked to participate in this campaign.

### 4. HOW LONG IS THE PLEDGE PERIOD?

A pledge period of five years (2020, '21, '22, '23, and '24) has been established to facilitate the generous levels of giving necessary for the success of the campaign.

### 5. MAY I MAKE A CONTRIBUTION OTHER THAN CASH?

Yes. Gifts of appreciated stocks and bonds, real estate, life insurance, and charitable trusts will be gratefully received. A planned giving expert will be made available upon request to help you understand the benefits of different methods of giving.

### 6. HOW MUCH SHOULD I PLEDGE TO THE CAMPAIGN?

Only you can prayerfully decide how much to give. Your pledge should be based on your ability to give, your understanding of the need, and your belief in the mission of Christ Church.

### 7. MAY I MAKE A GIFT TO HONOR SOMEONE?

Yes. A gift may be made to honor or memorialize someone. A special packet will be prepared for the honoree referencing the fact that a gift has been made in his or her name.

### 8. WILL CHRIST CHURCH CONTINUE TO SOLICIT ANNUAL GIFTS TO SUPPORT THE OPERATIONS OF THE PARISH?

Yes. Our annual campaigns must continue to seek pledges to cover the regular operations and ministry of Christ Church.

### 9. WILL I BE NOTIFIED WHEN THE PAYMENTS ON MY PLEDGE ARE DUE?

Yes. Regular reminders will be sent to you based on the pledge fulfillment plan you indicated.

*He put another parable before them, saying, "The kingdom of heaven is like a grain of mustard seed that a man took and sowed in his field. It is the smallest of all seeds, but when it has grown it is larger than all the garden plants and becomes a tree, so that the birds of the air come and make nests in its branches."*  
-Matthew 13:31-32

*But the seed on good soil stands for those with a noble and good heart, who hear the word, retain it, and by preserving produce a crop.*  
-Luke 8:15







Dear Brothers and Sisters,

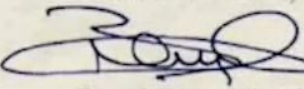
This is an exciting time in the life of Christ Church, Frederica, and we are very pleased and honored to serve as the campaign co-chairs for Rooted. Growing. Building.

Our campaign includes a three-fold request. First, to support the 2020 Annual Campaign by raising approximately \$1 million in pledged and non-pledged income to help fund our total operating budget of \$1.32 million. Second, we seek an additional \$6 million, total over five years, towards \$7.2 million worth of Vestry-approved physical improvements to the church campus. Finally, we ask that you consider joining the Dodge Society by making a legacy gift and remembering this special parish in your estate planning.

Many hard-working members of this congregation have devoted untold hours to define the components of this campaign. Please welcome our Steering Committee members who will be communicating the need for these components and inviting your faithful, financial response.

We ask you to prayerfully consider joining us in generously supporting this campaign as we write the next exciting chapter in Christ Church's legacy.

Yours in Christ,

 Bonney Susan

Beryl Blatchford, Bonney Shuman, and Susan Shipman  
*Campaign Chairs*



christ church

*frederica*

Rooted. Growing. Building.

6329 Frederica Road  
St. Simons Island, Georgia 31522  
ccfssi.org

## **Frederica Road Realignment: Frequently Asked Questions**

### **Why does Christ Church support shifting the path of Frederica Road?**

Christ Church has been an active and thriving congregation serving the surrounding region for 285 years. Our historic campus is the center of our church's ministry. The project to move Frederica Road will allow our parish to offer welcome and hospitality to parishioners, community members, and visitors for years to come without the safety risks created by lack of parking. It will also make it possible to increase our program and ministry space, and improve the accessibility of those spaces, so that we can adequately gather, educate, and inspire generations of the faithful in the work of the Gospel in this community.

### **What are the safety concerns with Frederica Road as it is?**

Without adequate parking, whenever someone comes to Christ Church's campus for worship, to participate in ministry, or to visit the grounds, they must park along Frederica Road. Pedestrians exiting their cars and crossing Frederica Road regularly have close calls with speeding vehicles. Christ Church has worked to address these concerns for more than a decade. Most recently, Christ Church worked to have flashing lights installed, yet drivers continue to ignore the warning. Some tourists unfamiliar with the area do not see and use the crosswalk, making their crossing even more dangerous. Buses – sometimes as many as six at the same time during peak tourist season – regularly unload into the street because of a lack of adequate parking.

Out of concern for the safety of worshippers, Christ Church has hired off-duty police officers to manage traffic on Sunday mornings and special occasions. Shifting the path of Frederica Road will allow residents and visitors alike to access Christ Church's campus without risk to their personal safety no matter the day or time. It will also make the road safer for drivers as it passes through the church grounds and continues north to Fort Frederica National Monument, Wesley United Methodist Church, Christian Renewal Church, Fort Frederica Presbyterian Church, and our neighbors. In addition to reducing the number of pedestrians crossing the road, the project will improve the curve at Old Monument Road and the intersection at Stevens Road.

### **Is the road impacting the marsh and/or wetlands?**

This project does not impact the salt marsh. It will impact 0.73 acres of freshwater wetlands, and compensatory mitigation credits to satisfy the requirements of the U.S. Army Corps of Engineers have been obtained. The project will not negatively impact water flow into the wetlands and the marsh following storms.



**Will the road project require cutting down live oaks?**

Yes. As plans were being drawn up, Christ Church and our planners walked the entire project site with a group of ISA Certified arborists, including the Glynn County arborist. Planners worked to avoid the largest oaks and to aim for dead or previously impacted trees whenever possible. Ultimately, engineering requirements did require the removal of ten large trees, including five live oaks, many of which were in decline. The plan also includes removing associated understory plantings. The road realignment project calls for planting 21 new live oak trees, which will mature over the next century and provide the next generation of tree canopy along the road. In addition, Christ Church will plant many more live oaks as part of the remaining church project that will follow on its property. After all projects are complete, the Christ Church area will have five to six new live oak trees for every large live oak that has been removed during construction. Christ Church is committed to care for these trees so that they thrive for centuries to come. We are installing a well to provide irrigation that will make it possible to keep the trees watered.

We advocated for the project to include extra measures to prevent the construction project from harming the roots of the trees that remain wherever possible. At the church's insistence, the County agreed to include special processes to trim roots where necessary and is also using special materials in the roadbed that will help tree roots stay healthier over the long term.

**Is the road project destroying historical sites or artifacts?**

No. A regional environmental and cultural resource firm has done a formal survey of historical impact and found that the road is not going to destroy any known or suspected valuable historical sites. A question from a local citizen led to a review of one particular portion of a ditch that is impacted by the road, but both the US Army Corps of Engineers and the Georgia State Historic Preservation Office determined that there was "no adverse impact" to that area.

**How is the Frederica Road project being funded?**

Christ Church has contributed \$1.62 million of the total project cost of \$1.67 million and will cover any cost overruns. Glynn County is paying. \$56,000 for improvements to the intersection of Stevens Road and Frederica Road that county leaders chose to add to the project.

The master plan for the Christ Church campus developed in 2017 by Marquis Latimer + Halback suggested that the parish work with Fort Frederica National Monument to help Glynn County seek Federal Land Access Program (FLAP) funds to help pay for shifting the path of Frederica Road. In the spring of 2018, Glynn County, with our help, successfully obtained the federal funding, accepting those funds about a year later.



It quickly became apparent that the timetable associated with use of the FLAP funds would lead to a years-long delay in realizing the safety improvements that the project will provide and would also result in much higher costs for the road shift and subsequent associated projects. In the spring of 2020, Christ Church and Glynn County agreed that Christ Church could provide the bulk of the funds, which would allow Glynn County to complete the project sooner. Despite this change in the funding source, the project still included thorough engineering, environmental and cultural surveying and permitting. Glynn County solicited bids for the project and selected a contractor in early 2021. The land swap between Glynn County and Christ Church that was required for the road to be shifted was completed this summer.

### **What is the Christ Church master plan?**

In 2016, the vestry, which is our church's governing board, began considering how Christ Church could best respond to God's call to serve our community and make room for a growing congregation and its mission. After initially considering the building a parking lot across Frederica Road, we stepped back in 2017 and engaged in a "100 year" master planning project with Marquis Latimer + Halback, a planning and design firm based in St. Augustine, to try to understand the future needs of the church and how we could plan for improvements to our ministry facilities and grounds in a comprehensive way.

As part of the planning process, we gathered data through workshops, surveys and interviews and analyzed our current, short, and long-term needs. Based on the research and feedback from our parishioners, we learned two important things:

- Christ Church does not have adequate space for its many ministries that serve the people of Glynn County.
- We have significant problems with lack of parking and with traffic safety.

Addressing our parking and safety issues was the first priority of a majority of the people who participated in the planning process. As a result, the subsequent master plan helped us determine that we could provide for safer parking, eliminate two blind curves, and better protect our historic assets if the path of Frederica Road, which runs in front of the church, was shifted. The road's new route was envisioned carefully to avoid significant trees.

Shifting Frederica Road will allow Christ Church to create the safe parking we need, eliminate the need for people coming to Christ Church to cross the road between two blind curves, and allow for space to expand our facilities and our mission as we look ahead to the next century.

### **How did the idea to shift Frederica Road originate?**

The idea to move Frederica Road has been floating around the congregation for well over a decade, but no one is quite sure where it originated. Interestingly, when the vestry of Christ Church sought proposals for a firm to conduct the master planning process, all three finalists recommended shifting the road in their final interviews.

### **When has the public had input into this process?**

In August 2017 Christ Church invited our neighbors on Stevens Road and in neighborhoods north of Christ Church along Frederica Road to a town hall meeting during which we explained the master plan and asked for feedback. We passed along the feedback to Glynn County, particularly a concern about increased speeds through the area. We have advocated for signage that monitors speeds and encourages drivers to slow down.

The plan to move Frederica Road was presented by Christ Church leaders and our representatives during public Glynn County meetings in 2017, 2018, and 2020. The final details of the land swap between the county and Christ Church required for the road realignment came before a County Commission meeting on June 3, 2021. In addition to public meetings, the project has been covered by local news outlets, including *The Brunswick News* and *The Islander*.

### **When did Christ Church acquire the land on which the new road is being built?**

Christ Church received nine acres from the Sea Island Company in 1986. At the same time, the Sea Island Company made nine acres available to the United Methodist Church and two three-acre parcels available for a Presbyterian congregation and the Christian Renewal Church, respectively. There was also a two-acre parcel given to Christ Church and the United Methodist Church for the creation of a memorial garden to John and Charles Wesley. The Wesley Garden, as it is known, was dedicated in 1988 and continues to be jointly maintained by Christ Church and Wesley United Methodist Church.

Christ Church is the last of these congregations to develop its parcel. The land we were given in 1986 was to be used for church purposes or otherwise left undeveloped. To accommodate the road project, we swapped a portion of the land with Glynn County in an even exchange. The nature of the exchange ensures that the land is being used for the benefit of Christ Church to make getting to the church safer and more accessible and allow for program and ministry growth in addition to the public safety benefits. The realignment project has full support of the entities that have an interest in the original transfer of the land to Christ Church.

**Is the road project impacting the Wesley Memorial Garden?**

The road project will encroach eight feet into the southeast corner of Wesley Garden. Based on an agreement made in 2019, the Wesley Garden received an equivalent parcel of land from Christ Church to offset the loss. The crepe myrtle trees within the right of way on that corner are being relocated to the grounds of Wesley United Methodist Church and Christ Church. There are also a few azaleas on that corner that are being replanted elsewhere within the Wesley Garden

**What will happen to the wooded path that leads from Christ Church to the Wesley Memorial Garden?**

Although shorter, the path will still connect from the sidewalk along the new stretch of road to the Memorial Garden. The markers that Christ Church installed at the entrance to the path will be moved to the new entrance to the path.





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## Christ Church, Frederica Campus Master Plan

# Phase 2: Executive Summary

Conceptual Master Plan

May 23, 2017



Marquis Latimer + Halback  
LANDSCAPE ARCHITECTURE · PLANNING







Christ Church Frederica  
Phase 2: Conceptual Master Plan  
EXECUTIVE SUMMARY

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May 23, 2017

Fr. Tom Purdy, **Rector**  
Susan Shipman, Sr. **Warden**

Prepared by the Marquis Latimer + Halback, Inc. Team



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# Introduction

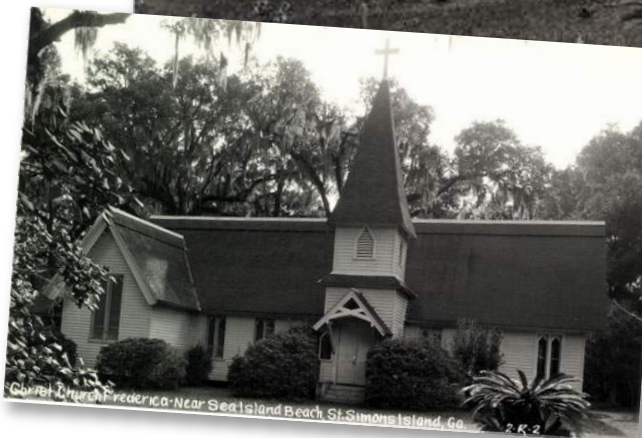
As noted in the Phase I “Inventory + Direction Setting” Executive Summary, Christ Church Frederica stands as both an **historic icon** and a **functional space of worship and celebration**. After completing an extensive parish participation program, with both a workshop and webinar in Spring 2017, the ML+H Team developed draft concepts (enclosed), creating spaces that are both welcoming to all, and comfortable for those that call the parish home.

The following pages present the conceptual master plan concepts for the main campus at Christ Church Frederica and the campus at St. Ignatius (for some concepts, both a mid-term (2-5 year) and long term (5-10 year)). Each concept seeks to create a unified campus, both through programmatic elements and pedestrian connections. A more cohesive campus will allow the Church to grow and expand, but also celebrate its rich history.



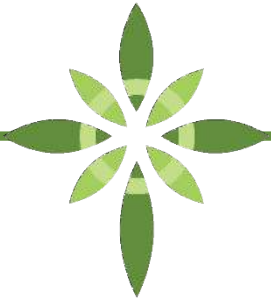
TOP  
LEFT  
RIGHT

Christ Church – late 1800s  
Christ Church – early 1900s  
Wesley Oak + Oglethorpe Road at Christ Church – early 1900s









## Parish Participation

Numerous workshops and webinars were held to field ideas, questions, and concerns pertaining to the campus and its programming. Numerous topics were discussed, including accessibility, existing structures, programming, safety (both pedestrian and vehicular), and visitor interaction. Findings included:

### *Short Term Needs at Christ Church Frederica:*

- **Parking (in proximity)**...2 services make parking even more of an issue
- **Safer parking** (+ security)
- **Better signage (directional + Frederica Rd...tasteful / historic)**
- ADA / accessibility (brick pathways, as an example...from Oglethorpe Hotel)
- Worship space (stage + storage of worship furniture)...175-200 in dual service
- Office space + Classroom space **including adult education**
- Bad infrastructure...MEP in Parish House (see energy audit)
- More programming space / gathering space (hall needs to be bigger)
- Outdoor rec field / indoor recreation area
- Group children's room / playground
- Kitchen (storage, usability)
- Church...HVAC; some foundation work (middle of church bounce); tie into water
- Tree canopy / arboriculture / canopy management / stormwater management
- Improved connection between church + parish house
- Gift / bookstore / welcome space for tourism...**nearly 75,000 to 100,000 visitors per year**
- Expansion of choir facilities
- Restrooms needed for tourists...note VBS conflicts

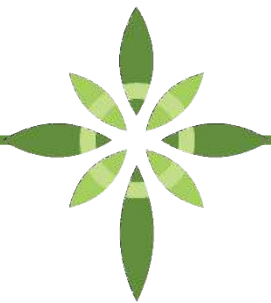




*Short Term Needs at St. Ignatius:*

- **Drainage**
- **Parking (needs security lighting as well)**
- **Bathroom**
- Lighting (exterior + interior)
- Storage/sacristy
- Signage...especially for vehicular
- Sound
- Seating...potentially move / get rid of organ (will be moving)  
~60 for Saturday service; less than 2x per week use now
- HVAC
- Need to tie in water
- Wedding / areas in the garden
- ADA / accessibility





# Reprogramming the Parish Hall

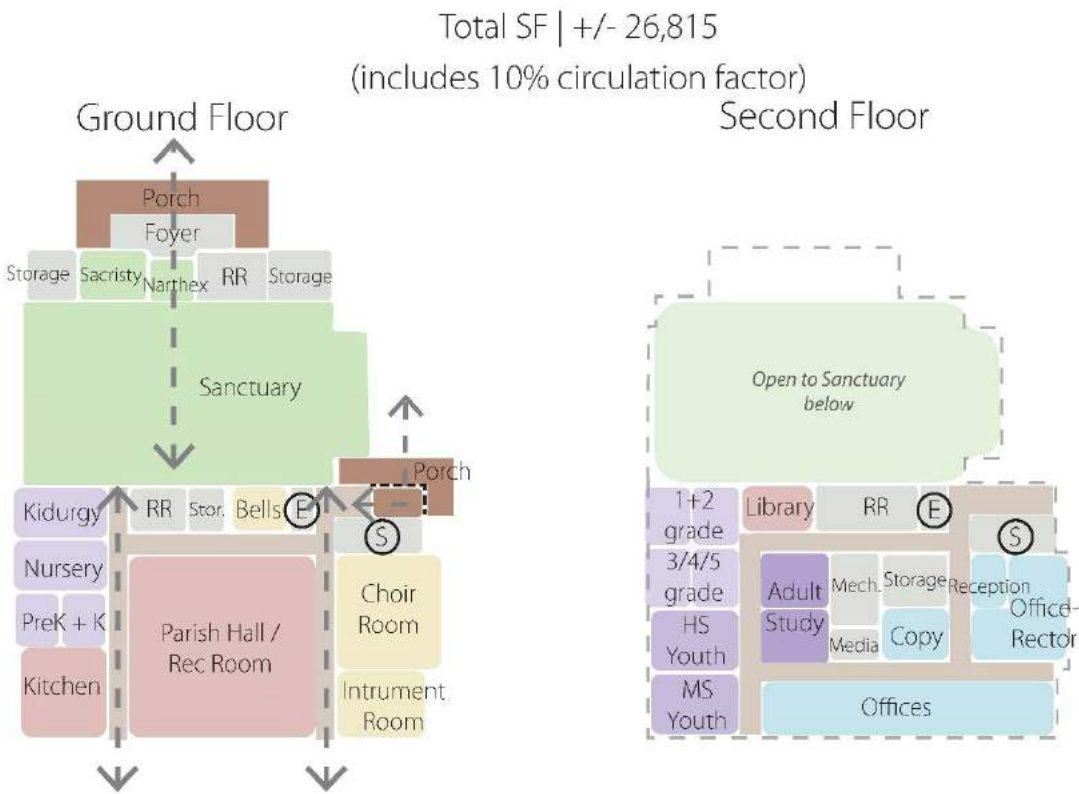
## Repurposed Parish Hall

The repurposed Parish Hall seeks to balance numerous programming requirements, while remaining a dynamic, and important attraction on the historic campus.

The most impactful change is the addition of a fully-functional, permanent sanctuary within the central structure. Here, additional services could be held to diminish any programmatic strain on the original Church on the campus.

The first floor also houses an expanded welcome center and foyer, allowing visitors access to the building, without interrupting services or parishioners. In addition, numerous classrooms and music rooms have been proposed, drastically expanding the square footage of the existing spaces, complemented by a central parish hall/recreation room for larger parish events.

The second floor is home to additional classrooms for older children and adults, ample storage, a library, and a new office block that will house all administrative affairs for the Christ Church Frederica campus.



Square Footage Breakdown

<div></div>	<b>Parish Facilities</b>	ACTUAL	DELTA	<div></div>	<b>Classrooms</b>	ACTUAL	DELTA
	Parish Hall + Rec Room	3600sf	(1287)		Kidurgy	330sf	(484)
	Kitchen	823sf	(480)		Nursery	500sf	(161)
	Library	320sf	(494)		Children's Rooms	1560sf	(588)
<div></div>	<b>Worship + Church</b>			<div></div>	Adult Study Room	775sf	(1016)
	Sanctuary	6750sf	(+1431)		Youth	1085sf	(137)
	Narthex + Foyer	740sf	(889)	<div></div>	<b>Offices</b>		
<div></div>	Sacristy	323sf	(+23)		Offices	2575sf	(430)
	<b>Music</b>				Reception	190sf	(+40)
	Choir Room	1275sf	(354)		Copy	365sf	(+60)
	Instrument Room	185sf	(15)	<div></div>	<b>Facilities + Storage</b>		
<div></div>	Handbells	250sf	(141)		Restrooms	1113sf	(+423)
					Storage	1093sf	(1000)
					Utility	525sf	(68)

Uses not included: Bride's Room + Parlor; Vesting Restroom; Choir Robing; Nursery Restroom; Showers; Welcome Center; Additional 1st + 2nd Grade Classroom; Additional 3rd-5th Grade Classroom; Additional Adult Study Classroom; Needed Storage

christ church

master plan

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1"=60'



Concept A  
Mid Term


Concept A (Mid-Term) focuses on four initial changes to the campus of Christ Church Frederica:

- 1) Construction of a **roundabout**
- 2) **Repurposing of the Parish Hall** as both a sanctuary/hall and an office space
- 3) Creation of a **recreation field** on the western limits of the property
- 4) Addition of a colonnade connecting the repurposed sanctuary/hall to the original Church.

The roundabout both slows traffic and serves as a focal point in the landscape. Towering oaks mark the entrance to the newly repurposed parish hall and visitor complex. In addition, a fully delineated parking lot reduces the need for gravel parking lots directly off of Frederica Road.


In addition, a secondary road connecting Old Monument Road with Stevens Road is proposed, both facilitating for additional parking and for future growth into the western extents of the property.










christ church  
master plan  
*deep roots, seeds for the future*


**CONCEPT A MID-TERM**  
Christ Church Frederica  
ML+H Project No. 17.11.0 | 05.23.17




0 60' 120'

**Legend**

-  Pedestrian Paths
-  Drop Off
-  Proposed Parking  
252 Parking Spaces on Property  
75 Parking Spaces on Roads  
327 Total Parking Spaces
-  Proposed Building/Renovation  
Narthex  
Sanctuary/Hall  
Office/Expansion  
Welcome Center
-  Green Connection



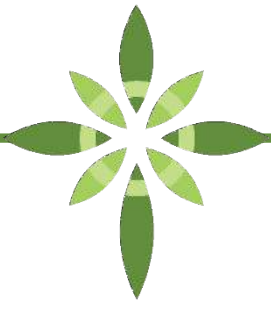
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# A New Parish Hall

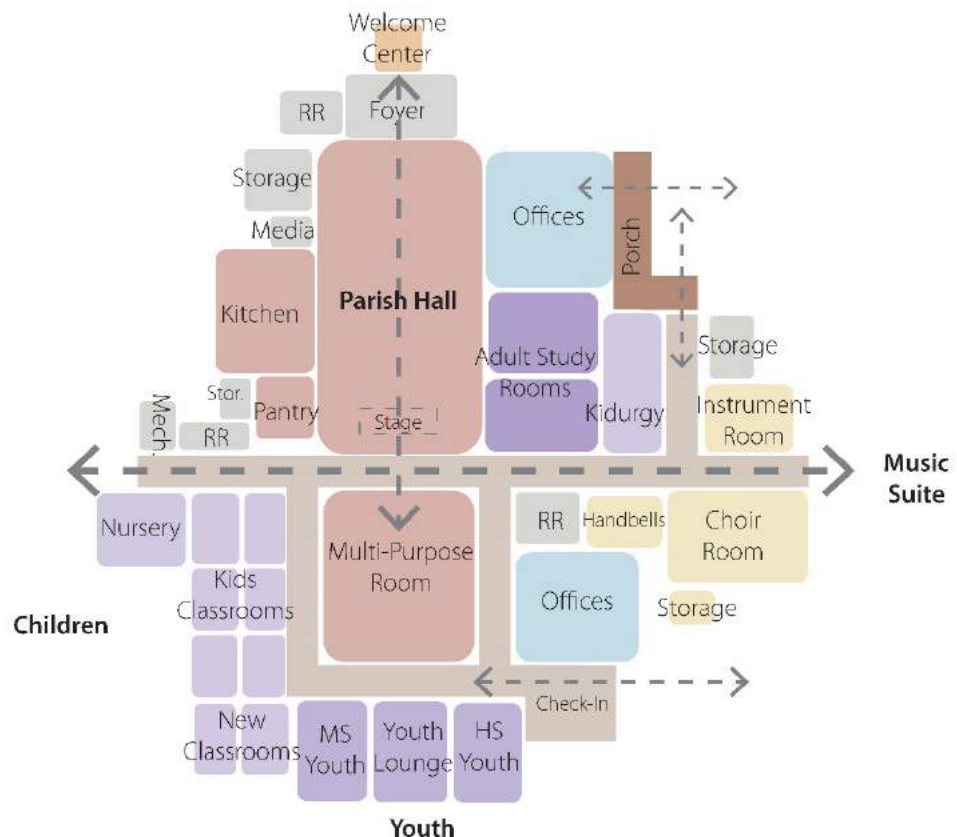
## New Parish Hall

A newly constructed parish hall also poses a number of opportunities for growth. While repurposing the entirety of the existing building allows for a second floor within the same relative footprint, a completely new building on a new site allows for all uses and spaces to remain on the ground floor, creating a Hall that is easily accessible to all, no matter their mobility.

One first enters through the Welcome Center, meant to be a space for visitors to learn about the history and culture of Christ Church. An expansive parish hall lies beyond, readily available for larger church functions. A complementary multi-purpose room lies just outside the hall, allowing meetings and other large functions to take place simultaneously.

Finally, the building has been laid out by use, allowing those children in class or the expanded music rooms to stay in one, secure area, while those church administrators are positioned in a space that will decrease any distractions.

Total SF | +/- 26,410  
(includes 10% circulation factor)



## Square Footage Breakdown

Parish Facilities		SF PER PROGRAMMING MATRIX	Offices		SF PER PROGRAMMING MATRIX
Parish Hall		4887sf	Main Office		1762sf
Kitchen		1596sf	Back Office		1272sf
Multi-Purpose Room		2250sf <small>based on 100 users</small>	Facilities + Storage		
Classrooms			Restrooms		572sf
Kidurgy		813sf	Storage		800sf
Nursery		661sf	Foyer		775sf
Children's Rooms		1660sf <small>partitioned or separate</small>	Utility		243sf
Adult Study Rooms		1791sf	Music		
New Classrooms		488sf	Choir Room		931sf
Youth		2210sf <small>includes additional 1000sf for lounge space</small>	Handbells		391sf
Visitor Facilities			Storage		161sf
Welcome Center		225sf	Instrument Room		326sf

Uses not included: Library/ Medium Meeting Room

1"=60'



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# A Concept Long Term

Concept A (Long Term) focuses on two major shifts from the mid-term concept, mainly focused on the programming of buildings on site.

- 1) Conversion of the sanctuary/hall to solely a **sanctuary and office space**.
- 2) Construction of a **separate parish hall (or pavilion space)** in the western portion of the site.

An expanded pedestrian circulation system would be created to help visitors and parishioners traverse the campus, especially in the western section of the site. In addition, all pedestrian crosswalks will be treated as "green connections," or walking spaces accented by lush plantings, helping to both slow traffic (through "side friction") and to create a comfortable and welcoming experience for parishioners.

The future hall and surrounding grounds would be buffered by tree plantings to screen any unsightly views from the National Park Service to the north.



## CONCEPT A LONG TERM Christ Church Frederica ML+H Project No. 17.11.0 | 05.23.17



0 60' 120'

Legend



Pedestrian  
Paths



Drop  
Off

Proposed Parking  
252 Parking Spaces on Property  
75 Parking Spaces on Roads  
327 Total Parking Spaces



Proposed Building/  
Renovation

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Green  
Connection












**B** Concept  
Mid Term

Concept B (Mid-Term) also focuses on a split use parish hall, both serving as a hall and temporary sanctuary. Frederica Road is also reconfigured. Major changes include:

- 1.) **Frederica Road shifts east**, freeing up ample parking space east of the existing parish hall.
- 2.) **Welcome Center** placed in front of Lych Gate.
- 3.) New **parking lot** proposed in front of existing parish hall.
- 4.) **Recreation field** proposed west of cemetery.
- 5.) **Additional trails** proposed along marsh extents.

Concept B seeks to both increase the number of opportunities for growth on the main campus, as well as define smaller spaces within the concept itself. Parking is kept predominantly to the east of the main campus structures, while still allowing easy access. Recreation and overflow is also pushed to the western section of the site.

Visitors are kept to the center of the site, allowing tourists to enjoy exploring the main campus and the original Church without infringing upon the goings-on within the parish hall.



**CONCEPT B MID-TERM**  
Christ Church Frederica  
ML+H Project No. 17.11.0 | 05.23.17

**Legend**

- Pedestrian Paths
- Drop Off
- Proposed Parking  
87 Parking Spaces on Property  
93 Parking Spaces on Roads  
180 Total Parking Spaces
- Proposed Building/Renovation  
Hall, Classroom, Office, Sanctuary, Chapel, Lych Gate
- Green Connection

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LANDSCAPE ARCHITECTURE + PLANNING

**ENB**  
ARCHITECTS







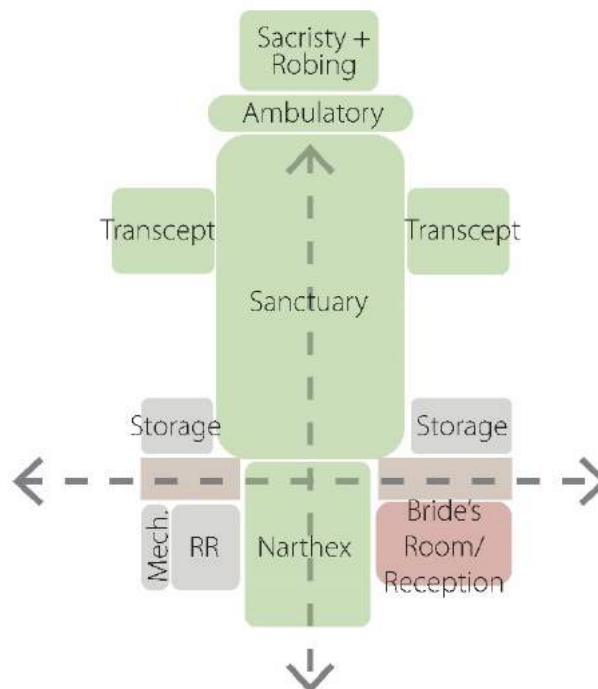
# A New Sanctuary

## Sanctuary

The new sanctuary allows service sizes to expand substantially, allowing more parishioners and worshipers to come together and celebrate the Word. Large spaces are also planned for the sacristy and robing areas, allowing ample space for acolytes and Celebrants to prepare before services.

Restrooms and storage opportunities are also expanded to increase the functionality of the space. Finally, a large reception room directly adjacent to the narthex will be used as both a gathering space as well as a bridal suite for any weddings taking place in the new sanctuary.

Total SF | +/- 11,000  
(includes 5% circulation factor)



## Square Footage Breakdown

<span style="color: #C0504D;">■</span>	<b>Parish Facilities</b>	SF PER PROGRAMMING MATRIX
	Bride's Room/Reception	814sf
<span style="color: #808000;">■</span>	<b>Worship + Church</b>	
	Sanctuary	4635sf
	Narthex	1629sf
	Sacristy+ Robing	880sf
	Transcept	1382sf <small>includes additional square footage for parish seating</small>
<span style="color: #A9A9A9;">■</span>	<b>Facilities + Storage</b>	
	Restrooms	360sf
	Storage	600sf
	Mechanical	163sf



Concept  
Long Term


Concept B (Long Term) focuses on activating the western portion of the site.

- 1.) Creation of a **separate sanctuary** to alleviate service requirements from the original church.
- 2.) Construction of a **road to connect Old Monument and Stevens Roads** (with adjacent parking).
- 3.) Two **additional parking lots** to serve the western portion of the site.
- 4.) Regulation size **recreation field** for sports of larger church events and gatherings.
- 5.) **Covered walkway** connecting the western portion of the site with the original core campus.

Concept B (Long Term) shifts the master planning focus to capital improvements in the undeveloped land to the west.

With a new designated sanctuary, the parish hall remains solely as a space for gathering and fellowship. The Hall becomes the unifying element between the two extents of the site, connecting the original church with the new sanctuary. In addition, by focusing development in the northwest quadrant, we both maintain and celebrate the history present on the site.





christ church master plan  
*Drop down... needs for the future.*

**CONCEPT B LONG TERM**  
Christ Church Frederica  
ML+H Project No. 17.11.0 | 05.23.17

**Legend**

- Pedestrian Paths
- Drop Off
- Proposed Parking  
223 Parking Spaces on Property  
93 Parking Spaces on Roads  
316 Total Parking Spaces
- Proposed Building/Renovation
- Green Connection

Marquis Latimer + Halback  
LANDSCAPE ARCHITECTURE · PLANNING

ENB  
ARCHITECTS





# St. Ignatius Chapel

The St. Ignatius campus poses several drastically different obstacles from the main campus at Christ Church Frederica. Here noise, a condensed site, and nearby conflicting uses pose an interesting design exercise.

The following pages detail possible solutions to both solve those problems and create a space that can grow and evolve over time to further serve the needs of the clergy that worship at St. Ignatius Chapel. The first concept focuses on development within the existing parcel, while the two following it aim to expand the Church's landholdings outside of the existing parcel.



## A Concept Mid Term

The **St. Ignatius Chapel** is first **rotated** so that the entry space and front door is interior to the site, not opening out onto Demere Road. The **southern transept** is then **extended** for **additional space for restroom facilities**.

**Permeable pavers** are to be used as the surface for the majority of the new parking lot, allowing stormwater drainage, while clearly delineating parking stalls. Finally, a possible connection between the site and the residences to the north should also be explored.

## Concept B Long Term

The **St. Ignatius Chapel** is again **rotated** for ease of access and comfort. A narthex would also be added to the northwest access point of the church, creating a more formal entry space. In addition, the **parcel to the north** of the site would be purchased to **create additional space** for a **new parish hall** to serve the St. Ignatius campus.

**Wooded green spaces** serve as a means of connecting the two buildings, providing both shade as well as inviting pedestrian pathways throughout the site.



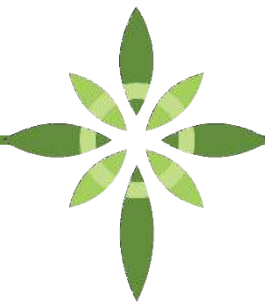
## Concept C Long Term

The **St. Ignatius Chapel** is **moved entirely** from the front portion of the site to the back parcel. In addition, a **second parcel is purchased**, creating additional developable land to the west.

This new space serves as a location for an that will serve as a gathering space **elongated parish hall** for the clergy. Again, **permeable pavers** help better delineate parking spaces, while **wooded green corridors**, help link the two structures and unify the site. These wooded corridors also help highlight the strong axis emanating from the front door of the church, guiding all worshippers into the Chapel.







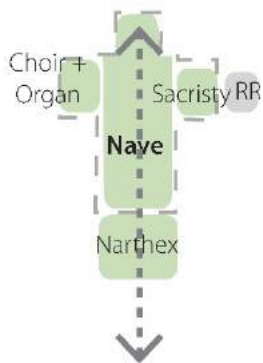
# A Re-envisioned St. Ignatius Church

## Sanctuary

St. Ignatius Church has been re-envisioned to include an expanded narthex to serve as a welcoming foyer space for parishioners and visitors. This narthex will allow such items as coats, church bulletins, and other items to be placed just outside the nave, so that the sacred space within is not interrupted.

In addition, the transept will be extended to provide additional square footage for a needed extension to the existing restroom facilities.

Total SF | +/- 1,440



## Square Footage Breakdown

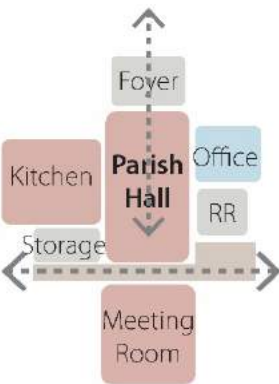
	SF PER PROGRAMMING MATRIX
<b>Worship + Church</b>	
Nave	783sf
Narthex	319sf
Sacristy	120sf
Choir + Organ	132sf
<b>Facilities + Storage</b>	
Restrooms	85sf

Parish Hall

A parish hall is also proposed to alleviate any programming needs currently placed on the Church itself. Here, ample space is provided for offices, a fully-equipped kitchen, a large meeting room, ample storage space and restrooms.

The heart of the building, the parish hall itself, lies in the center, surrounded by other ancillary rooms, allowing numerous programs and activities to take place at the same time.

Total SF | +/- 3,875  
(includes 5% circulation factor)



Square Footage Breakdown

	SF PER PROGRAMMING MATRIX
<div></div> <b>Parish Facilities</b>	
Parish Hall	1056sf
Kitchen + Pantry	765sf
Meeting Room	825sf
<div></div> <b>Offices</b>	
Office	330sf
<div></div> <b>Facilities + Storage</b>	
Restrooms	168sf
Storage	210sf
Foyer	336sf





## Next Steps

Looking toward the future, we will delve into creating a final master plan for both the main campus at Christ Church Frederica and the St. Ignatius Church. The final master plan will focus on a more complete layout of parking, pedestrian circulation, structural programming, tree mitigation,, landscape spaces, visitor spaces, and clergy spaces.

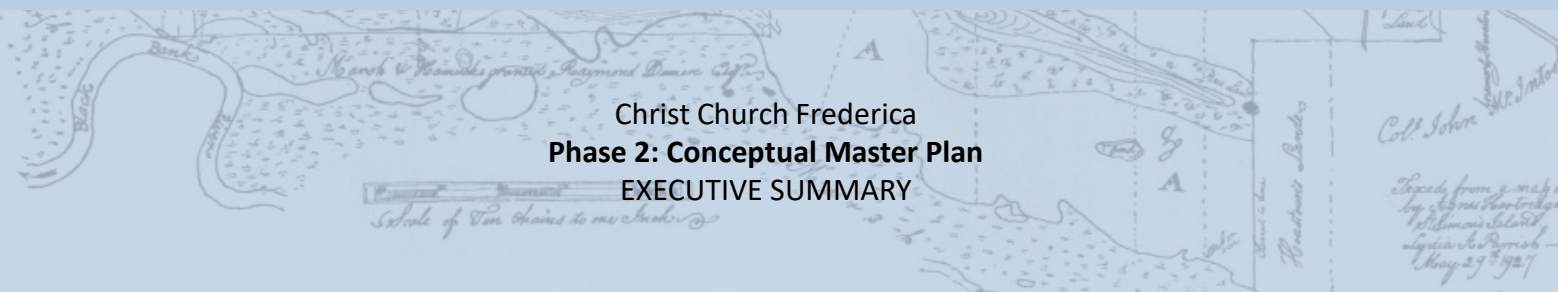
Each of these elements will help create an image of the church in the future.

A **growing** church, a **sustainable** church, a church **rooted in its past**, yet embracing the **possibilities of tomorrow**.



*deep roots. seeds for the future.*

Christ Church Frederica  
**Phase 2: Conceptual Master Plan**  
EXECUTIVE SUMMARY





D: DEED B: 4493 P: 268

07/07/2021 12:47 PM

0632021011161 Pages: 5 Recording Fee: \$25.00

Transfer Tax: \$0.00

Ronald M. Adams

Clerk of Superior Court, Glynn County, GA

PREPARED BY OR AT THE DIRECTION OF:  
GILBERT, HARRELL, SUMERFORD & MARTIN, P.C.  
777 GLOUCESTER STREET, SUITE 200  
BRUNSWICK, GEORGIA 31520

A PORTION OF TAX PARCEL ID NUMBER: 04-08229

GEORGIA, GLYNN COUNTY.

A CONVEYANCE, made this 6th day of July, 2021, from CHURCH  
WARDENS AND VESTRYMEN OF THE EPISCOPAL CHURCH OF THE TOWN OF  
FREDERICA, CALLED CHRIST CHURCH (sometimes also referred to and called THE WARDENS  
AND VESTRYMEN OF THE EPISCOPAL CHURCH OF THE TOWN OF FREDERICA CALLED  
CHRIST CHURCH), a Georgia corporation, to GLYNN COUNTY, GEORGIA, a political  
subdivision of the State of Georgia, as the Second Party;

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of Ten Dollars (\$10.00), cash to First Party in  
hand paid by the Second Party, at or before the sealing and delivery of these presents, the receipt of  
which is confessed, and of other good and valuable consideration unto it moving, and in accordance  
with the provisions of the Memorandum of Understanding and Real Property Exchange Agreement  
between the parties hereto dated July 16, 2020, the First Party hereby grants, bargains, sells and  
conveys unto the Second Party, its successors and assigns, in the manner hereinafter set out, the  
following described real property, to-wit (the "Property"):

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0632021011161 Page 2 of 5

All that certain lot, tract or parcel of land situate, lying and being on the Island of St. Simons, in Glynn County, Georgia, and being located within a tract of land owned by the First Party, located just to the north of the present location of the public right-of-way known as Frederica Road, the tract of land being hereby conveyed containing 3.043 acres, more or less, and being described and identified according to Exhibit "A", attached hereto and made a part hereof, said 3.043-acre tract being labelled in said Exhibit "A" as "Area to be conveyed to Glynn County".

TOGETHER WITH a public access easement over and across that portion of the area lying within the boundaries of other property owned by First Party labeled "PROPOSED 30' ACCESS EASEMENT #2", containing 0.055 acres, as shown on the plat referred to in the descriptive paragraph above, which runs from the south boundary of the "Area to be conveyed to Glynn County" by deed of even date herewith, through other property of First Party not being conveyed hereby, said 30-foot easement running from the new location of Frederica Road which is to be located in the property on this date being conveyed by Christ Church to Glynn County, the purpose of said easement being to provide public access between the property of Fort Frederica National Monument to the new Frederica Road location to be situated in the property this date conveyed to Glynn County by Christ Church.

BE IT UNDERSTOOD that a portion of Frederica Road shall be relocated from its present location to the "area to be conveyed to Glynn County" as shown on the plat which is referred to in the said Exhibit "A", with the new location for the paved portion of Frederica Road being set out generally on the "PRELIMINARY ROAD STAKING PLAN", which is attached to the Memorandum of Understanding and Real Property Exchange Agreement dated July 16, 2020 as Exhibit "B", along with relocated sidewalks and crosswalks, and other matters set out on said Preliminary Road Staking Plan.

BE IT FURTHER UNDERSTOOD as follows:

(a) that subsequent to the acquisition of the Property, the County will be responsible for the performance of the matters set out in Item (d)iii on page 3 of the Memorandum of Understanding and Real Property Exchange Agreement between the parties hereto dated July 16, 2020, to include the provision that the County shall be responsible for the oversight, supervision and construction of the public roadway to be located in the property herein described, as well as sidewalks, drainage ditches, crosswalks, grates, culverts, drain pipes and other associated improvements shown on Exhibit "B" of said Real Property Exchange Agreement, and shall assume all liabilities for the construction of the said roadway and other associated improvements on the property herein acquired and described; and

(b) that the County will not use the Property for any purpose other than the construction, use, and maintenance of a public right-of-way and associated uses, including, but not necessarily limited to the construction, use, and maintenance of the property for the relocation and use of the portion of Frederica Road being relocated under the terms hereof, together with the usual and necessary sidewalks, paths, drainage ditches, crosswalks, grates, culverts, drain pipes, roadbed, and other improvements and utilities as customarily may be associated therewith.



[Next Page](#)

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TO HAVE AND TO HOLD the Property, together with the improvements thereon, and all and singular the rights, members and appurtenances thereunto belonging or in any manner appertaining unto the Second Party, its successors and assigns, forever in fee simple, subject, however, to the matters set out herein-below.

AND THE FIRST PARY HEREBY WARRANTS and will forever defend unto the Second Party, its successors and assigns, the right and title hereby conveyed in and to the Property above described as against the lawful claims and demands of all persons whomsoever, except as to any claims or demands arising from: (i) the permitted exceptions to which reference has hereinabove been made; (ii) zoning; (iii) general utility, sewer and drainage easements of record; and (iv) title to any portion of the captioned property which now lies or formerly lay below the high water mark of a tidal watercourse or body of water or tidally influenced fresh water river or stream, or which is comprised of lands which are now or were formerly comprised of salt marsh (as said salt marshes are defined under the terms of the Georgia Coastal Marshlands Protection Act of 1970), or which is within the jurisdictional area of the United States Army Corps of Engineers, said portions of said tracts are subject to the terms and provisions of the laws, regulations and ordinances of the State of Georgia, to include but not be limited to said Marshlands Protection Act, as well as to the terms and provisions of the laws and regulations of the United States of America (to include but not be limited to such regulations as are promulgated by said Corps of Engineers) governing the use and regulation of tidal watercourses, salt marshlands and other wetlands, and to such claims as the State of Georgia may exert to the title to said marshlands and the beds of tidal watercourses as well as set backs imposed from said areas by the State of Georgia or the United States of America or any agency of said government.

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SIGNATURE PAGE FOLLOWS

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0632021011161 Page 4 of 5

IN WITNESS WHEREOF, the First Party has hereunto set its corporate hand, affixed its corporate seal, and delivered these presents on this the day and year first above written.

CHURCH WARDENS AND VESTRYMEN OF THE  
EPISCOPAL CHURCH OF THE TOWN OF  
FREDERICA, CALLED CHRIST CHURCH

By: Bonney Shuman  
Its: Treasurer

ATTEST:

By: Gordon R. Zeese  
Its: Secretary

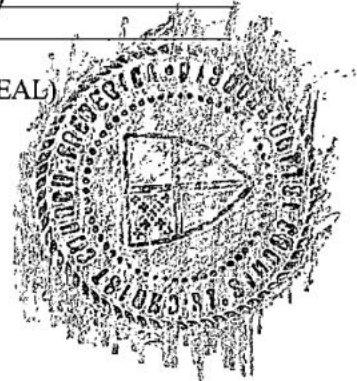
(CORPORATE SEAL)

Signed, sealed and delivered  
in the presence of:

[Signature]  
Unofficial Witness

Jordan Forrest  
Notary Public.

My Commission Expires: 4/13/23  
(NOTARIAL SEAL)





D: DEED B: 4493 P: 272 07/07/2021 12:47 PM  
0632021011161 Page 5 of 5

EXHIBIT "A"

*Legal Description of the Property*

All that certain lot, tract or parcel of land situate, lying and being on the Island of St. Simons, in Glynn County, Georgia, which is described and identified according to a plat of survey entitled "Land Swap Survey for a Portion of : Christ Church Property & Frederica Road R/W", as "AREA TO BE CONVEYED TO GLYNN COUNTY" which tract of land contains 3.043 acres according to said plat, and is described according to said plat of survey as follows: beginning at the point of beginning of said tract which point is labelled "P.O.B." and is marked with a ½ inch capped iron rebar set (hereinafter "CIRS"), at the intersection of lines C9, C14 and L5, on the existing location of the northeasterly right-of-way line of Frederica Road, and from said point running thence North 26 degrees 52 minutes 54 seconds West for a distance of 455.27 feet to a ½ inch CIRS; thence running along arc of curve C15, concave to the east and having curve data as set out on said plat, for a distance of 200.68 feet to a ½ inch CIRS which is found by following the chord of said curve North 12 degrees 59 minutes 41 seconds West for a distance of 198.72 feet, and which CRIS is located on the southeasterly line of the existing public road leading to West Point Subdivision; thence running along said right-of-way line North 36 degrees 26 minutes 23 seconds East for a distance of 95.12 feet to a ½ inch capped iron rebar found (hereinafter "CIRF"); thence running along line L7 along the boundary between the line herein described and the tract known as Tract II, Wesley Memorial, South 11 degrees 38 minutes 09 seconds West for a 39.93 feet to a ½ inch CIRS; thence continuing along said boundary between the land herein described and Tract II, Wesley Memorial, along line L8 South 68 degrees 05 minutes 05 seconds East for a distance of 35.48 feet to a ½ inch CIRS; thence running along line L9 South 26 degrees 52 minutes 46 seconds East for a distance of 56.65 feet to a ½ inch CIRS; thence running along the arc of curve C11, concave to the southwest and having curve data as set out on said plat, for a distance of 87.76 feet to a ½ inch CIRS which is found by following the chord of said curve South 21 degrees 46 minutes 12 seconds East for a distance of 87.65 feet; thence continuing along said boundary along the arc of curve C12, concave to the northeast and having curve data as set out on said plat, for a distance of 344.74 feet to a ½ inch CIRS which is found by following the chord of said curve South 31 degrees 11 minutes 04 seconds East for a distance of 341.06 feet; thence running along the arc of curve C13, concave to the northeast and having curve data as set out on said plat, for a distance 335.77 feet to a ½ inch CIRS which is found by following the chord of said curve South 57 degrees 20 minutes 46 seconds East for a distance of 333.46 feet; thence running South 23 degrees 15 minutes 13 seconds West along the easterly boundary of the tract herein described and conveyed for a distance of 174.36 feet to a ½ inch iron rebar found (hereinafter "IRF") located on the northeasterly existing right-of-way line of Frederica Road; thence running along said northeasterly right-of-way North 70 degrees 52 minutes 53 seconds West for a distance 140.00 feet to a ½ inch IRF; thence continuing along said right-of-way along the arc of Curve C14, concave to the northeast and having curve data as set out on said plat, for a distance of 174.70 feet to the ½ inch CIRS marking the point of beginning of the tract herein described, which point is found by following the chord of said curve North 57 degrees 02 minutes 57 seconds West for a distance of 173.01 feet.

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07/07/2021 12:47 PM

0632021011162 Pages: 5 Recording Fee: \$25.00

Transfer Tax: \$0.00

Ronald M. Adams

Clerk of Superior Court, Glynn County, GA

PREPARED BY OR AT THE DIRECTION OF:  
GILBERT, HARRELL, SUMERFORD & MARTIN, P.C.  
777 GLOUCESTER STREET, SUITE 200  
BRUNSWICK, GEORGIA 31520

NO TAX PARCEL ID NUMBER; COUNTY ROAD RIGHT-OF-WAY

GEORGIA, GLYNN COUNTY.

A CONVEYANCE, made this 6th day of July, 2021, from GLYNN COUNTY, GEORGIA, a political subdivision of the State of Georgia, as the First Party, to the CHURCH WARDENS AND VESTRYMEN OF THE EPISCOPAL CHURCH OF THE TOWN OF FREDERICA, CALLED CHRIST CHURCH, as the Second Party;

WITNESSETH:

FOR AND IN CONSIDERATION of the sum of Ten Dollars (\$10.00), cash to First Party in hand paid by the Second Party, at or before the sealing and delivery of these presents, the receipt of which is confessed, and of other good and valuable consideration unto it moving, and in accordance with the provisions of the Memorandum of Understanding and Real Property Exchange Agreement between the parties hereto dated July 16, 2020, the First Party hereby grants, bargains, sells and conveys by quitclaim unto the Second Party, its successors and assigns, in the manner hereinafter set out, the following described real property, to-wit (the "Property"):

All that certain lot, tract or parcel of land situate, lying and being on the Island of St. Simons, in Glynn County, Georgia, and being a portion of a tract of land owned by the First Party, presently constituting the public right-of-way known as Frederica Road, the portion of said right-of-way being hereby conveyed containing 2.98 acres, more or less, and being described and identified according to Exhibit "A", attached



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hereto and made a part hereof; said 2.98-acre tract being labelled in said Exhibit "A" as "Area to be conveyed to Christ Church".

BE IT UNDERSTOOD that the Property is conveyed subject to the reservation and retention in Glynn County of a public access easement over and across that portion of the area lying within the boundaries of the Property labeled "PROPOSED 30' ACCESS EASEMENT #1", containing 0.368 acres, as shown on the plat referred to in the descriptive paragraph above, which runs from the south boundary of the "Area to be conveyed to Glynn County" by deed of even date herewith, through the property herein conveyed and described in detail, said 30-foot easement running from the new location of Frederica Road which is to be located in the property on this date being conveyed by Christ Church to Glynn County, the purpose of said easement being to provide public access between the property of Fort Frederica National Monument to the new Frederica Road location to be situated in the property this date conveyed to Glynn County by Christ Church.

BE IT FURTHER UNDERSTOOD that any pavement or sidewalk shown on the plat referenced in the attached Exhibit "A" as being located within the area being described herein and being hereby conveyed to Christ Church by Glynn County is strictly informative, and only serves to show the present location of the sidewalks and pavements; the pavement of Frederica Road will in due course be relocated into the property being conveyed by even date herewith by Christ Church to Glynn County, and any and all sidewalks, paths, roadbed, and paving areas located within the property this date being conveyed to Christ Church shall be located or re-located at the sole discretion of Christ Church, with the following exceptions:

(a) The County reserves the right to use, operate, and maintain, on behalf of the public, the existing portion of the Frederica Road right-of-way, including paths, which is being relocated under the terms hereof, for public right-of-way purposes, until said new and relocated portion of said Frederica Road right-of-way has been constructed and marked by the County according to the usual and normal standards, and completed, accepted, and opened by the County for public right-of-way use; provided, that, upon such completion, acceptance and opening of the new relocated portion of the Frederica Road right-of-way to the public, the rights of the County and public to the use of the existing portion of Frederica Road shall cease. Additionally, the County further reserves to itself a temporary construction easement over the other parts of the property being conveyed to Christ Church hereunder as may be reasonably necessary to assist in the relocation and construction of the subject portion of Frederica Road, including, but not limited to, the storage, staging, and assembly of vehicles, equipment, and materials needed for the project; provided, that, upon such completion, acceptance and opening of the relocated portion of the Frederica Road right-of-way to the public, the rights of the County to use such property as a temporary construction easement shall cease.

(b) The new roadway to be located in the "proposed 30' access easement" running from the new location of Frederica Road down to the Park Service housing area will be constructed and provided in accordance with the aforesaid Memorandum of Understanding and Real Property Exchange Agreement; further, the property herein described and conveyed is subject to the reservation and retention in Glynn County of such rights in the said area for continued use of the property for public utility purposes, including but not limited to electric power and water and sewer uses, all as set out in

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Item 7(b) of said Memorandum of Understanding and Real Property Exchange Agreement.

TO HAVE AND TO HOLD the real property above described and hereby conveyed, together with the improvements thereon, and all and singular the rights, members and appurtenances thereunto belonging or in any manner appertaining unto the Second Party, its successors and assigns, forever in fee simple; subject, however, to the matters hereinabove set out.

IN WITNESS WHEREOF, the First Party, acting by and through its duly authorized officers, has hereunto set its hand, affixed its seal, and delivered these presents on this the day and year first above written.

GLYNN COUNTY

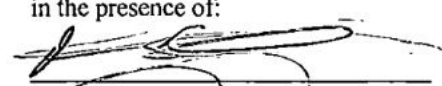
By:   
Its: Chairman

ATTEST:

By:   
Its: Acting County Clerk

(COUNTY SEAL)

Signed, sealed and delivered  
in the presence of:

  
Unofficial Witness

  
Notary Public.

My Commission Expires: 4.25.15  
(NOTARIAL SEAL)





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0632021011162 Page 4 of 5

## EXHIBIT "A"

*Legal Description of Property*

All that certain lot, tract or parcel of land situate, lying and being on the Island of St. Simons, in Glynn County, Georgia, which is described and identified according to a plat of survey entitled "Land Swap Survey for a Portion of: Christ Church Property & Frederica Road R/W", as "AREA TO BE CONVEYED TO CHRIST CHURCH", which tract of land contains 2.980 acres, according to said plat, and is described according to said plat as follows: beginning at the point of beginning on said plat, labeled "P.O.B.", which point is marked with a ½ inch capped iron rebar found (hereinafter "CIRF"), located on the existing southerly right-of-way of Frederica Road, at its intersection with Stevens Road, and from said point of beginning running thence along said right-of-way along the following lines and curves: along the arc of curve C1, concave to the northeast and having curve data as set out on said plat, for an arc length of 75.00 feet to a ½ inch CIRF which is found by following the chord of said curve North 68 degrees 41 minutes 21 seconds West for a distance of 74.95 feet; thence running North 65 degrees 22 minutes 24 seconds West for a distance of 95.30 feet to a ½ inch CIRF; thence running along the arc of curve C2, concave to the northeast and having curve data as set out on said plat, for a distance of 104.24 feet to a ½ inch capped iron rebar set (hereinafter "CIRS") which is located by following the chord of said curve North 54 degrees 44 minutes 03 seconds West for a distance of 103.64 feet; thence running along the arc of curve C3, concave to the northeast and having curve data as set out on said plat, for a distance of 128.85 feet to a drill hole found (hereinafter "DHF") which is located by following the chord of said curve North 39 degrees 13 minutes 59 seconds West for a distance of 128.69 feet; thence running North 34 degrees 22 minutes 15 seconds West for a distance of 122.30 feet to a ½ inch CIRF; thence running along the arc of curve C4, concave to the southwest and having curve data as set out on said plat, for a distance of 185.89 feet to a ½ inch CIRF which is located by following the chord of said curve North 38 degrees 35 minutes 29 seconds West for a distance of 185.72 feet; thence running North 42 degrees 48 minutes 44 seconds West for a distance of 148.38 feet to a drill hole found in wall ("DHF in wall"); thence running along the arc of curve C5, concave to the southwest and having curve data as set out on said plat, for a distance of 166.35 feet to a ½ inch CIRF which is found by following the chord of said curve North 50 degrees 47 minutes 33 seconds West for a distance of 165.81 feet; thence running North 58 degrees 44 minutes 48 seconds West for a distance of 319.68 feet to a ½ inch CIRF located on the southerly property line of the Fort Frederica National Monument; thence running along line L1 along the southeasterly boundary of Fort Frederica National Monument North 35 degrees 31 minutes 28 seconds East for a distance of 51.72 feet to a concrete monument found (hereinafter "CMF"); thence continuing along the boundary of said National Monument South 61 degrees 31 minutes 11 seconds East for a distance of 372.33 feet to a CMF; thence continuing along said boundary of said National Monument North 42 degrees 54 minutes 58 seconds East for a distance of 251.66 feet to a ½ inch CIRS; thence running across the old right-of-way of the road leading to West Point Subdivision along line L2 South 47 degrees 05 minutes 02 seconds East for a distance of 33.27 feet to a ½ inch CIRS; thence continuing across said right-of-way along line L3 South 70 degrees 25 minutes 00 seconds East for a distance of 21.96 feet to a ½ inch CIRS; thence continuing across said right-of-way along the arc of curve C6, concave to the east and having curve data as set out on said plat, for a distance of 53.34 feet to a ½ inch CIRS which is located by following the chord of said curve South 04 degrees 35 minutes 00 seconds West for a distance of 53.31 feet; thence running along the line between the area being hereby described and an area to be retained by Christ Church (a portion of Tract I, Wesley Memorial) along line L4 South 36 degrees 26 minutes 23 seconds West for a distance of 23.03 feet

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to a ½ inch CIRF; thence running along the arc of curve C7, concave to the southeast and having curve data as set out on said plat, for a distance of 181.14 feet to a DHF (Drill Hole Found) which is found by following the chord of said curve South 19 degrees 15 minutes 20 seconds West for a distance of 178.43 feet; thence running along the arc of curve C8, concave to the southwest and having curve data as set out on said plat, for a distance of 290.77 feet to a ½ inch CIRF (RLS 1927) which is found by following the chord of said curve South 40 degrees 21 minutes 47 seconds East for a distance of 290.18 feet; thence running South 34 degrees 03 minutes 59 seconds East for a distance of 176.89 feet to a ½ inch CIRF (RLS 1927); thence running along the arc of curve C9, concave to the northeast and having curve data as set out on said plat, for a distance of 57.78 feet to a ½ inch CIRS which is found by following the chord of said curve South 38 degrees 38 minutes 31 seconds East for a distance of 57.72 feet; thence running across the existing right-of-way of Frederica Road along line L5 South 26 degrees 52 minutes 54 seconds East for a distance of 36.01 feet to a point; thence continuing across said existing right-of-way of Frederica Road along the arc of curve C10, concave to the northeast and having curve data as set out on said plat, for a distance of 256.21 feet to a point which is found by following the chord of said curve South 44 degrees 36 minutes 38 seconds East for a distance of 252.14 feet; thence continuing across said existing right-of-way of Frederica Road along line L6 South 27 degrees 39 minutes 37 seconds West for a distance of 7.31 feet to the ½ inch CIRF which marks the point and place of beginning of the tract herein described and conveyed.



**IN THE SUPERIOR COURT OF GLYNN COUNTY  
STATE OF GEORGIA**

CENTER FOR A SUSTAINABLE	)	
COAST and JEFF KILGORE,	)	
	)	
Plaintiffs,	)	CIVIL ACTION FILE NO.
	)	<u>CE21-01136</u>
v.	)	
	)	
GLYNN COUNTY, GEORGIA, a political	)	
subdivision of the State of Georgia and	)	
COMMISSIONERS, SAMMY	)	
TOSTENSEN, CAP FENDIG, WAYNE	)	
NEAL, BILL BRUNSON, ALLEN	)	
BOOKER, DAVID O'QUINN, WALTER	)	
RAFOLKSI, Individually, in their official	)	
capacities, and CHURCH WARDENS AND	)	
VESTRYMEN OF THE EPISCOPAL	)	
CHURCH OF THE TOWN OF	)	
FREDERICA, CALLED CHRIST	)	
CHURCH.	)	
	)	
Defendants.	)	

**AFFIDAVIT OF JEFFREY W. BUCKHOLZ IN SUPPORT OF MOTION FOR  
TEMPORARY RESTRAINING ORDER**

**STATE OF GEORGIA  
COUNTY OF GLYNN**

**COMES NOW** the Affiant, **JEFFREY W. BUCKHOLZ**, who first being duly sworn,  
does on oath, depose and say the following is true and correct under penalty of perjury:

1.

My name Jeffrey W. Buckholz. I voluntarily and freely make this affidavit on my own personal knowledge in support of Plaintiffs' Center for a Sustainable Coast and Jeff Kilgore's Motion for Temporary Restraining Order. I am over the age of eighteen (18) years. I am suffering

from no legal disability, and I am competent and authorized to make this affidavit and to testify to the statements contained herein.

2.

I am a senior level traffic engineer with over 40 years of wide ranging experience in the transportation profession, including serving as the technical and administrative head of my own consulting and engineering firm for over 30 years. I have a PhD in Civil Engineering with a Transportation major and Statistics minor.

3.

I have reviewed the site plan for the Frederica Road Relocation Project. I have also reviewed traffic and accident reports for Glynn County and St. Simons, Island, Georgia.

4.

Despite the fact that Defendants Glynn County and Christ Church use “traffic” and “safety” issues as a justification for the Project, in my professional opinion, there is currently no identified problem with traffic or safety issues in and around the Project Site.

5.

In my opinion, if such issues were valid, Defendants Glynn County and Christ Church would have performed a traffic study with an associated accident analysis or conflict analysis. No such traffic study was performed related to this Project.

6.

Relocating a road is a major decision and the record does not include the type of information that a government would review before deciding to move an existing road. There is no traffic study, no traffic engineering analysis, and no substantiated evidence of a safety problem.

7.



Accident reports from January 2014 through September 2019 identified only one accident in the project area. This left turn accident did not involve a pedestrian and it is not the type of accident that would be avoided by realigning the roadway. One accident over a period greater than five-years does not support Defendants' claim that the road has "unsafe intersections and alignments."

8.

In my professional opinion, if the road was dangerous Defendant Glynn County presumably would have identified it as needing safety improvements. And even if needed, safety improvements such as the installation of roundabouts, the addition of additional turn lanes, and the provision of enhanced pedestrian facilities could be accomplished without moving the road. Defendant Christ Church's master planning process identified other access alternatives that involved significantly less impact, if any, on the surrounding natural and historic environment.

9.

In my professional opinion, there are currently no identified "traffic" or "safety" issues with the current alignment of Frederica Road and any minor benefit of the proposed Road Relocation Project come nowhere near justifying the substantial costs and negative impacts of relocating the road.

Affiant further sayeth not.

This the 17th day of November, 2021.



Digitally signed by  
Jeffrey W. Buckholz  
DN: cn=Jeffrey W.  
Buckholz,  
o=BUCKHOLZ  
TRAFFIC  
ENGINEERING, ou,  
email=jwbuckholz  
@aol.com, c=US  
Date: 2021.11.17  
11:03:19 -05'00'

Jeffrey Buckholz  
Affiant

Sworn and subscribed before me,  
this the 17 day of November, 2021

Kendall Zawodny (SEAL)  
Notary Public exp. 10/24/2024



**US ARMY CORPS OF ENGINEERS, SAVANNAH DISTRICT  
PRE-CONSTRUCTION NOTIFICATION (PCN) CHECK-LIST  
2018 REGIONAL PERMITS 30, 31, 32, 33, 34 AND 35**

APPLICANT Dave Austin, Glynn County Public Works Director Date 30 November 2020

Phone(hm/bus) 912-554-7746 E-Mail daustin@glynncounty-ga.gov

Address 4145 Norwich Street Ext. City Brunswick State GA Zip Code 31520

AGENT/CONSULTANT Kristen Deason - Environmental Services Inc.

Phone(hm/bus) 912-236-4711 E-Mail kdeason@esinc.cc

Address 2201 Rowland Ave City Savannah State GA Zip Code 31404

PROJECT LOCATION Section of Frederica Road adjacent to Christ Church between  
Stevens Road and Old Monument Road.

City St. Simons County Glynn Latitude 31.421239 Longitude -81.612076

Nearest Named Stream, River or Other Waterbody Frederica River

Project Funding: Federal \_\_\_\_\_ State \_\_\_\_\_ County X City \_\_\_\_\_

PROJECT DESCRIPTION (III 3.B) The proposed project will consist of relocating a section  
of Frederica Road and additionally re-purposing the existing section as an extended  
entry to the Christ Church Episcopal in St. Simons Georgia. In order to relocate the  
roadway to the east, freshwater wetlands will be impacted during construction.

PROJECT AREA AND JURISDCITIONAL WATERS IMPACT/LOSS INFORAMTION						
	PROJECT AREA		TEMPORARY IMPACTS		PERMANENT LOSSES	
	Acres	Linear Feet	Acres	Linear Feet	Acres	Linear Feet
Project Area	XX	N/A	N/A	N/A	N/A	N/A
Upland	XX	N/A	N/A	N/A	N/A	N/A
Wetlands	0.73	N/A	0	N/A	0.73	N/A
Open Waters		N/A		N/A		N/A
Perennial Streams						
Intermittent Streams						
Ephemeral Streams						
Man-Made Ditches						



SUPPLEMENTAL INFORMATION. The questions below concern regulations, terms, and/or special conditions (SC) that may be applicable to a project proposed for authorization by these RPs. For each YES answer, the PCN must include information necessary to document that applicable regulations, terms, and/or SCs will be met.

1. Is the project funded by local, state or federal government? (SC 1) Yes X No
2. Does the project involve construction of a bridge over navigable waters? (SC 7) Yes        No X
3. Does the project require 408 authorization? (SC 10) Yes        No X
4. Will the project impact anadromous fish waters? (SC 11) Yes        No X
5. Is the project located in a designated floodplain or floodway? (SC 12) Yes X No
6. Is a Georgia Stream Buffer Variance required for the project? (SC 14) Yes        No X
7. Does the project involve construction or replacement of a culvert? (SC 16) Yes X No
8. Is compensatory mitigation required for the project? (SC 18) Yes X No
9. Are federally protected species present in the project area? (SC 19) Yes        No X
10. Has the Corps or FHWA made a Section 7 affect determination? Yes        No X
11. Are cultural resources located in or near the project area? (SC 20) Yes X No
12. Has the Corps or FHWA made a Section 106 affect determination? Yes        No X
13. Is the project located in tidal wetlands? (SC VI) Yes        No X
14. Has a copy of the PCN been submitted to the Georgia CRD? (SC VII) Yes X No
15. Has a copy of the PCN been submitted to the Georgia EPD? (SC VII) Yes X No
16. Will EFH be impacted by the project? (Magnuson Stephenson Act) Yes X No
17. Have proposed project related impacts to aquatic resources been avoided to the maximum extent practicable? (Section 404(b)(1)) Yes X No

IMPORTANT NOTES: All maps and drawings that are attached to this PCN must be submitted on 8 ½ X 11-inch paper. Supplemental maps and drawings larger than 8 ½ X 11 may also be submitted for clarity.

### **Certificate of Service**

I certify that I served this *Amended Complaint for Injunctive Relief and Damages* with accompanying Exhibits A - G by emailing counsel of record a copy in portable document format (PDF) and showing in the subject line of the email message the words "STATUTORY ELECTRONIC SERVICE" in capital letters.

/s/ Jon Schwartz

Jon Schwartz  
Ga. Bar. No. 631038  
*Attorney for Plaintiffs*  
*Center for a Sustainable Coast and Jeffrey Kilgore*