



COASTAL RESOURCES DIVISION
ONE CONSERVATION WAY · BRUNSWICK, GA 31520 · 912-264-7218

WALTER RABON
COMMISSIONER

DOUG HAYMANS
DIRECTOR

April 24, 2026

MEMORANDUM

TO: Board of Natural Resources

FROM: Doug Haymans

SUBJECT: Public Comment Summary - proposed amendments to the Saltwater Fishing Regulations, Chapter 391-2-4 - **UPDATE**

On March 24, 2026, a public notice announcing written comment period for shellfish regulation changes was posted on CoastalGaDNR.org's Public Notice section and submitted through Coastal Resources Division's "GovDelivery" email service which includes print, television and radio outlets. In total, notices were delivered to 28,303 self-nominated subscribers of the News Releases, Public Notices, Public Meetings and Recreational Fishing categories with 8,665 subscribers opening the e-mail and 207 people clicking the link to review the public notice package. A written comment period was open through April 23, 2026.

Eight comments were received, seven were relevant to the proposed amended board rule. All seven were in support. Of the seven, three were from the public and four were industry related.

The eighth comment did not relate to extended hours for summer harvest but to historical industrial contaminants in the nearby estuary. CRD will contact the Environmental Protection Division regarding this comment.

All comments are summarized and full text included in the attachment to this memo.

Name	Date received	Letter	Support/Oppose	Date Replied and Addressed Questions	Comment
Julian Heyman	3/24/2026	n	Support with Recommendations	3/25/2026	A longer hours for mariculture harvesting oysters should be beneficial in helping Georgia commercial oyster market businesses. However, there must be penalties if restriction are not maintained. Water temperatures need to be monitored and water tested for any Vibrio bacteria during the new extended commercial hours for harvesting. This is a wonderful opportunity for Georgia business providing strict cooling and handling practices are followed.
Mitzi Michelson	3/25/2026	n	Support	3/26/2026	I am writing to convey my support of extending the hours during which shellfish - such as oysters - can be harvested so that this segment can grow and prosper. I hope this helps secure success.
David H Hobbs	3/28/2026	n	Support	3/30/2026	Hi. If the new rule change proposal for oyster harvesting hours is implemented, will incidents of illness due to Vibrio bacterial illnesses traceable to Georgia oysters be published? Are such statistics presently available? It seems reasonable to track any possible results related to public health associated with the change.
Patrick Stubbers	4/3/2026	n	Support	4/6/2026	I would like to show my support to the rule change regarding morning harvest of oysters. I have been to a few southern states that already have this style in place, and it has worked, if they are not thrown directly into an ice bath causing cold death. I believe this is a great step to getting GA closer to being current with other states in producing a great and safe oysters! Thanks for your time in this matter. Seabear Oyster Bar, Athens,GA 706-372-6101
Perry and Laura Solomon/Tybee Oyster Company	4/14/2026	yes-letter	Support	4/15/2026	Perry and I are sending this because we want to be on the record in support of this amendment to the regulation, and more importantly, that we are proud of the collaboration between the growers association, our regulators, and the team at UGA Marine Extension. Please share this with the DNR Board as well. Thank you, Laura Solomon Tybee Oyster Company / ECO Georgia Phone: 757.971.2434
Noah Brendel/Patrick Stubbers - Seabear Oyster Bar	4/16/2026	yes-letter	Support	4/16/2026	Thanks for taking the time to consider. Noah Brendel
Tyler Leslie - Shell to Shore	4/16/2026	yes-letter	Support	4/16/2026	Please see the attached letter on behalf of Shell to Shore regarding the amendments to Rule 391-2-4. Thank you for the opportunity to provide our input on this matter!
Alice Keyes - One Hundred Miles	4/23/2026	yes-letter	Support with Recommendations	4/24/2026	Please accept the attached comments regarding CRDs proposed saltwater fishing regulations. Thank you for the opportunity to review and offer this feedback.



April 13, 2026

Dear Mr. Guadagnoli and Members of the Board of Natural Resources,

On behalf of Tybee Oyster Company, I am writing to express our strong support for the proposed amendment to Rule 391-2-4 to expand allowable summer harvest hours for maricultured oysters. As a family-owned oyster farm operating in coastal Georgia, we have experienced firsthand the careful balance required between protecting public health, maintaining product quality, and sustaining a viable working waterfront. The proposed adjustment to allow harvest beginning 30 minutes before sunrise until 10:00 a.m. reflects a thoughtful, science-based approach to that balance.

We are especially proud of the collaborative process that led to this proposed rule. The partnership between Georgia's shellfish growers, the University of Georgia Marine Extension and Georgia Sea Grant, and the Department of Natural Resources reflects the very best of how policy should be developed—through science, shared learning, and open communication. This level of coordination builds trust and ensures that both public health and industry realities are fully considered. Research demonstrates that, when proper handling and cooling protocols are followed, oysters harvested can be safely brought to market while minimizing *Vibrio* risk. This is consistent with best practices already used successfully in other shellfish-producing states.

From an operational perspective, the current two-hour window presents significant logistical challenges. Expanding the harvest window will allow growers to operate more safely and efficiently on the water, improve working conditions for crews, and better align harvest practices with the realities of tides, weather, and farm management. These are not minor adjustments; they directly impact the ability of small farms to operate responsibly and sustainably.

From an economic standpoint, this rule change represents an important step in supporting Georgia's emerging shellfish aquaculture industry. Since the passage of enabling legislation in 2019, growers have made meaningful investments in infrastructure, workforce development, and coastal stewardship. Providing reasonable access to harvest during the summer months strengthens the viability of these businesses without compromising consumer safety.

It is also important to recognize that maricultured oysters are distinct from wild harvest. Farmed oysters are handled individually, subject to strict oversight, and produced under controlled conditions that allow for consistent application of time-to-temperature protocols. This level of accountability supports the safe expansion of harvest opportunities under the proposed rule.

Georgia has the opportunity to continue building a responsible, science-driven aquaculture sector that contributes to local economies, supports working waterfronts, and enhances coastal ecosystems. This proposed amendment is a meaningful step in that direction.

We appreciate the leadership of the Coastal Resources Division in advancing research, engaging stakeholders, and developing policies that reflect both rigor and practicality. We respectfully encourage the Board to adopt the proposed amendment.

Thank you for your consideration and for your continued support of Georgia's coastal communities.

Sincerely,

Two handwritten signatures in blue ink. The first signature is a cursive 'L' followed by a horizontal line. The second signature is a more complex cursive script, possibly 'Perry Solomon', with a long horizontal line extending to the right.

Laura and Perry Solomon, Owners Tybee Oyster Company

laura@tybeeoyster.com 757 971 2434



RE: Proposed Amendment to Rule 391-2-4, Public Input on Proposed Shellfish Harvest Rule Change

Dear Mr. Dominic Guadagnoli,

We would like to show my support for the rule change to Rule 391-2-4. It is the opinion of Seabear Oyster Bar that harvesting oysters in the summer is not only beneficial for the ecology of our coastlines but furthermore the sustainability of an industry that needs our help. We have purchased over 2 million oysters in the 12 years we have been operating here in Athens, GA and out of that 2 million oysters only a tiny fraction have been GA oysters. We want this to change dramatically, as much as we like to support oyster farmers all over the U.S, we would really like to support our own farmers here in the peach state. We see no reason why our neighboring states can harvest successfully in the summer while our farmers sit with idle hands and empty checking accounts. Why not support an industry that was once the lynchpin of the state, why not provide more jobs for counties like McIntosh county (one of the poorest on the eastern seaboard), why not promote a fishery that is not only highly sustainable, but also profitable for farmers, distributors, restaurants, and ultimately the state. I doubt the folks in the capital building in ATL would rather us spend our money in FL, AL, SC, NC as opposed to GA. Everything about this change of the rule is positive, I honestly can't see one downside to this rule changing. Thanks for your time in the matter and I look forward to watching this closely as I have an obvious vested interest in this rule changing.

With Hope for Change,

Noah Brendel & Patrick Stubbers



Tyler Leslie

Executive Director
director@shelltoshore.com
2032060137

RE: Proposed Amendment to Rule 391-2-4, Public Input on Proposed Shellfish Harvest Rule Change

Dear Mr. Dominic Guadagnoli,

We would like to show our support for the rule change to Rule 391-2-4. An amendment to this rule would provide positive economic benefits to the growing Georgia shellfish aquaculture industry and the adjacent restaurant industry, while still ensuring the healthy and safe consumption of oysters. Additionally, we believe that this rule change will yield significant ecological benefits to the Georgia coastline via a larger number of opportunities to recycle oyster shells. With a larger window of harvesting, we expect that more oysters will be grown, harvested, sold, consumed, and thus produce a larger available resource of recycled oyster shells that Shell to Shore can then deploy to increase our state's coastal resiliency. Increased economic opportunity within Georgia's shellfish aquacultural practices will have a direct ecological benefit on our coasts through our recycling and restoration work. Thank you very much for the opportunity to provide a comment on the proposed amendment to Rule 391-2-4.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tyler Leslie', written in a cursive style.

Tyler Leslie
Executive Director

April 23, 2026

Sent via electronic mail to: dom.guadagnoli@dnr.ga.gov

Mr. Dominic Guadagnoli
Coastal Resources Division
Department of Natural Resources
Coastal Resources Division
One Conservation Way
Brunswick, Georgia 31520



*RE: Comments on proposed amendments to Georgia's Saltwater Fishing Regulations,
Rule 391-2-4-.19*

Dear Mr. Guadagnoli,

Thank you for the opportunity to submit comments to the Coastal Resources Division (CRD) regarding updates to the saltwater fishing regulations, rule 391-2-4-.19. Please accept these comments on behalf of the members of One Hundred Miles (OHM), a non-profit organization dedicated to protecting and preserving Georgia's 100-mile coast through education, advocacy, and community engagement.

CRD's efforts to restore oyster habitat and expand mariculture in coastal Georgia can be beneficial to the State, local businesses, and residents. However, because of the legacy of contamination in Glynn County marshlands, **OHM encourages CRD to implement extra precautions and test any seafood harvested in estuaries with tidal connectivity to Brunswick's superfund sites because of the known presence of dangerous toxicants in our marshlands.**

Glynn County is home to lush marshes, accessible barrier islands, and culturally rich communities. But many of the chemical and paper industries that once bolstered economic growth have left a legacy of pollution in the environment and in residents of Glynn County. Many industries that have closed are now listed by the U.S. Environmental Protection Agency (U.S. EPA) as superfund sites, contaminated locations that pose significant risks to human health and the environment due to hazardous waste. Two of the superfund sites in Glynn County include hundreds of acres of contaminated marshlands. The former Hercules plant is now a superfund site composed of over 200 acres of contaminated public marshlands,¹ and the former Honeywell/LCP chloro-alkali processing plant is a superfund site with over 600 acres of contaminated public marshlands.²

In 2025, Emory University published a peer-reviewed journal article documenting that contaminants left-over from Glynn County's closed industrial sites are not only in the environment, but also in residents' blood.³ The study revealed of the 100 volunteers tested,

¹ U.S. EPA Superfund Site Home Page for Terry Creek Dredge Spoil Areas/Hercules Outfall Brunswick, GA
<https://cumulis.epa.gov/supercpad/cursites/csinfo.cfm?id=0404439>

² U.S. EPA Superfund Site Home Page for LCP Chemicals Georgia Brunswick, GA
<https://cumulis.epa.gov/supercpad/cursites/csinfo.cfm?id=0401634>

³ Scovronick, Noah, B. Lappe, M. Pearson, et al. "Assessment of human exposure to uncommon industrial toxicants in Glynn County, Georgia, Environmental Pollution, Volume 375, 2025, -

40% of the study participants have higher concentrations than 95% of Americans of a polychlorinated biphenyl (PCB) known as Aroclor 1268, that is associated with the former Honeywell/LCP plant. Twenty percent of study participants had higher concentrations than 95% of Americans of a now-banned insecticide known as toxaphene created at the former Hercules facility in Brunswick.

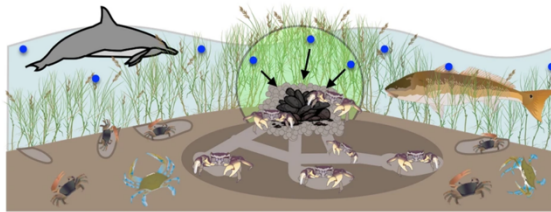
In 2021, a study conducted by the Department of Environmental Engineering Sciences at the University of Florida investigated the role that mussels play in distributing sediment-bound PCBs to surrounding marsh animals and into the local food chain on Blythe Island in Glynn County.⁴ One of the significant findings from this study was that the presence of mussels in marshlands polluted with PCBs increased PCB concentrations in nearby marsh crabs and into the surrounding environment:

“The pronounced difference in sediment PCB between mussel and non-mussel enclosures supports our hypothesis that mussels rapidly elevate PCB concentrations via their filtration of PCB-enriched particulates from the tidewater and deposition of this material to the marsh surface (Fig. 4a,b). These findings... highlight that suspension-feeding bivalves may generate ‘hotspots’ of PCB bioavailability in coastal sediments where tidal flow velocities are low enough to enable the settling of their PCB-enriched biodeposits.”⁵ (See figure 4 excerpt from the University of Florida study).

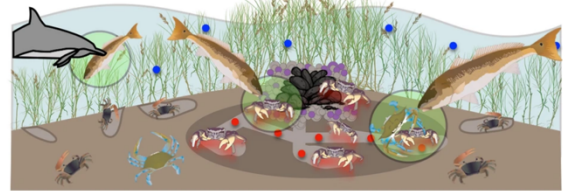
Figure 4

From: [Mussels drive polychlorinated biphenyl \(PCB\) biomagnification in a coastal food web](#)

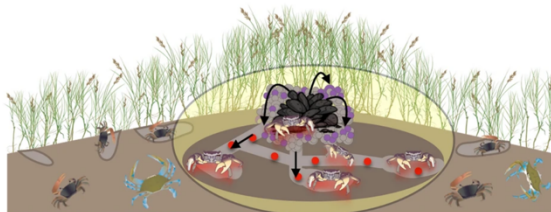
a. Mussels filter feed on PCB-laced particulates from tide waters, a trophic interaction.



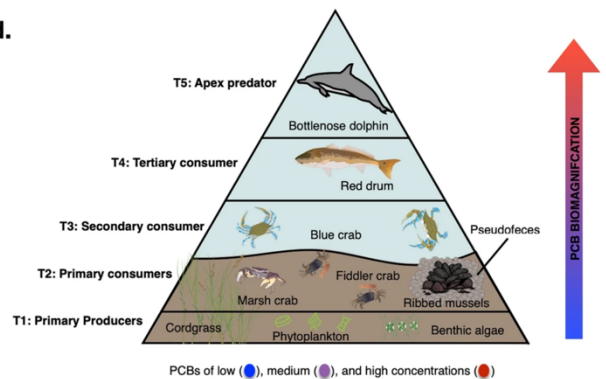
c. Marsh predators consume PCB-enriched marsh crabs, a trophic interaction, thereby driving PCB biomagnification in this coastal food web.



b. Mussels deposit PCB-laced pseudofeces on the marsh surface and burrowing marsh crabs mix them downward, accumulating PCBs from sediments via epidermal/gill absorption, a non-trophic interaction.



d.



<https://doi.org/10.1016/j.envpol.2025.126240>

⁴ Prince, K.D., Crotty, S.M., Cetta, A. *et al.* "Mussels drive polychlorinated biphenyl (PCB) biomagnification in a coastal food web." *Sci Rep* **11**, 9180 (2021). <https://doi.org/10.1038/s41598-021-88684-9> or <https://www.nature.com/articles/s41598-021-88684-9>

⁵ *Ibid.* (page 6)

While the University of Florida research did not measure PCB concentrations in the tissue of the studied mussels, other investigations have. Tissue samples collected by the U.S. EPA have demonstrated elevated levels of PCBs and other contaminants in fish and shellfish in Glynn County estuaries.⁶ Currently, the Georgia Environmental Protection Division (EPD) has a DO NOT EAT consumption advisory for clams, mussels, and oysters throughout the Turtle River estuary and the St. Simons Sound⁷ due to the presence of these toxicants, which may be easily spread to other estuaries and tidal creeks in the vicinity.

Please accept this information as evidence that dangerous toxicants in Georgia marshes and waterways remain long after the plants discharging polluted wastewater have closed. **As CRD invests in restoration of oyster habitat and enhances opportunities for oyster harvest, we encourage the State to also invest in expanding monitoring and sampling of seafood tissue and surrounding sediments to ensure all harvested animals are safe for consumption.** Specifically, we recommend that CRD work closely with the Georgia EPD and DNR-affiliated toxicologists to test Glynn County fish and shellfish for PCBs, mercury, and lead.

Thank you for your consideration. Contact me at any time if I can be of assistance or if you have any questions – 912.230.6494 or alice@onehundredmiles.org.

Sincerely,

Alice M. Keyes

Alice M. Keyes
Senior Conservation Strategist
One Hundred Miles

⁶ Total Maximum Daily Load (TMDL) Development for Fish Consumption Guidelines due to PCBs in Gibson Creek, Terry Creek, Purvis Creek, and the Turtle River System, Georgia and Commercial Fishing Ban due to PCBs in Purvis Creek (HUC 03070203) U.S. EPA Region 4 (2001)
https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://epd.georgia.gov/document/publication/epa-turtle-river-pcbs-fcg-and-cfb-tmdl-report-2001/download&ved=2ahUKewjUlvKS1YSUAxWL_8kDHRnfMoAQFnoECBqQAQ&usq=AOvVaw1FAD86SynULYBcua8royUj

⁷ Georgia DNR Guidelines for Eating Fish in Georgia Waters (2023)
<https://epd.georgia.gov/https%3A/epd.georgia.gov/assessment/fish-consumption-guidelines>