

**AGENDA**  
**PLANNING COMMISSION**  
**REGULAR MEETING**  
**3:30 p.m. Tuesday, March 3, 2020**  
**City Council Chambers, 2nd Floor of City Hall**  
**823 Rosenberg, Galveston, Texas**

1. Call Meeting To Order
2. Attendance
3. Conflict Of Interest
4. Approval Of Minutes: February 18, 2020

Documents:

[2020-02-18 PC MINUTES.PDF](#)

5. Request To Address Commission On Agenda Items Without Public Hearings And Non-Agenda Items (Three-Minute Maximum Per Speaker. If Speaking Through A Translator, Six-Minute Maximum Per Speaker)
6. New Business And Associated Public Hearings
  - A. 20P-005 (4914 Avenue K) Request For A Replat In Order To Increase The Number Of Lots From One (1) To Two (2). Property Is Legally Described As Menard Survey Lot 17 And West 14.4 Feet Of Lot 16, And The East 3.6 Feet Of Lot 18, Block 8, Denver Resurvey, In The City And County Of Galveston, Texas. Applicant: Melinda Medellin-Quiroga Property Owners: Joey C. Quiroga And Melinda Medellin-Quiroga

Documents:

[20P-005 PKT.PDF](#)

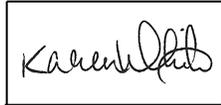
7. Discussion And Action Items
  - Comments from the Texas General Land Office regarding Beach Maintenance (Staff)
  - Consider and provide a recommendation to City Council the Beach Access Ad Hoc Committee's recommendations regarding Beach Maintenance (Staff)

Documents:

[3-3-20 BEACH MAINTENANCE DISCUSSION.PDF](#)  
[2020-01-23 - MEMO TO COUNCIL RE BEACH MAINTENANCE RECOMMENDATIONS.PDF](#)  
[2020-01-23 - STAFF FINDINGS OF BEACH MAINTENANCE BEST PRACTICES.PDF](#)

8. Adjournment

I certify that the above Notice of Meeting was posted in a place convenient to the public in compliance with Chapter 551 of the Texas Government Code on February 27, 2020 at 4:00 P.M.

A rectangular box containing a handwritten signature in black ink that reads "Karen White".

Prepared by: Karen White, Planning Technician

IN ACCORDANCE WITH THE PROVISIONS OF THE AMERICANS WITH DISABILITIES ACT (ADA), PERSONS IN NEED OF A SPECIAL ACCOMMODATION TO PARTICIPATE IN THIS PROCEEDING SHALL, WITHIN THREE (3) DAYS PRIOR TO ANY PROCEEDING, CONTACT THE CITY SECRETARY'S OFFICE, SUITE 201, 823 ROSENBERG, GALVESTON, TX 77550 (409-797-3510)

**MEMBERS OF CITY COUNCIL MAY BE ATTENDING AND PARTICIPATING IN THIS MEETING**



# City of Galveston

MINUTES OF THE PLANNING COMMISSION OF THE CITY OF GALVESTON  
REGULAR MEETING – February 18, 2020

## CALL MEETING TO ORDER

The meeting was called to order at 3:30 p.m.

## ATTENDANCE

Members Present: Jeff Antonelli, Cate Black, Lisa Blair, Bob Brown, Jeffrey Hill, Carol Hollaway, CM John Paul Listowski

Members Absent: Eugene Cook

Staff Present: Catherine Gorman, AICP, Assistant Director/HPO; Virginia Greb, Assistant Coastal Resource Manager; Karen White, Planning Technician; Donna Fairweather, Assistant City Attorney

## APPROVAL OF MINUTES

The February 3, 2020 minutes were approved with the following change:

- Specify that Chairperson Cate Black left rather than recused herself.

Council Member John Paul Listowski arrived at 3:31 p.m.

## CONFLICT OF INTEREST

None

## REQUEST TO ADDRESS COMMISSION ON AGENDA ITEMS AND NON-AGENDA ITEMS (THREE MINUTE MAXIMUM PER SPEAKER)

None

## NEW BUSINESS AND ASSOCIATED PUBLIC HEARINGS

**19BF-097 (Beachside Village)** Request for a Beachfront Construction Certificate/Dune Protection Permit in order to perform annual beach maintenance. Property is legally described as follows: Beach (0-16) Beachside Village (2004), Beachside Village Section 4 (2016), Open Space and Beach Access (0-3), Beachside Village Section 5 (2019) Beach Reserve and Open Space Access, a subdivision in the City and County of Galveston, Texas.

Applicant: Debbie Reinhart

Property Owner: Beachside Village, HOA, Inc.

Staff presented the staff report.

Chairperson Cate Black opened the public hearing on case 19BF-097. Representative of the applicant Bruce Reinhart presented to the Commission. The public hearing was closed and the Chairperson called for questions or comments from the Commission.

Jeff Antonelli made a motion to approve case 19BF-097 with staff's recommendations. Vice-Chairperson Jeffrey Hill seconded, and the following votes were cast:

In favor: Antonelli, Black, Blair, Brown, Hill, Hollaway

Opposed: None

Absent: Cook

Non-voting participant: CM Listowski (Ex-Officio)

**The motion passed.**

**20P-003 (4824 Austin Drive)** Request for designation as a Galveston Landmark. Property is legally described Lot 8, Palm Gardens, a Subdivision, in the City and County of Galveston, Texas.  
Applicant and Property Owner: Dr. Calvin E. Buckley

Staff presented the staff report.

Chairperson Cate Black opened the public hearing on case 20P-003. The public hearing was closed and the Chairperson called for questions or comments from the Commission.

Bob Brown made a motion to recommend approval of case 20P-003 with staff's recommendations. Carol Hollaway seconded, and the following votes were cast:

In favor:	Antonelli, Black, Blair, Brown, Hill, Hollaway
Opposed:	None
Absent:	Cook
Non-voting participant:	CM Listowski (Ex-Officio)

**The motion passed.**

**20P-004 (Adjacent to 1827 Avenue M)** Request for a License to Use in order to relocate an existing entry staircase, landing, awning and railing in the right of way. Adjacent property is legally described as the North 54-feet of Lot 1 (1-3) in the Northwest Block 20, Galveston Outlots, in the City and County of Galveston, Texas.  
Applicant: Brax Easterwood, AIA  
Adjacent Property Owners: Mary Elizabeth Pennington  
Easement Holder: City of Galveston

Staff presented the staff report and noted that of thirty-four (34) notices of public hearing sent, two (2) had been returned in favor.

Chairperson Cate Black opened the public hearing on case 20P-004. Applicant Brax Easterwood, AIA, presented to the Commission. The public hearing was closed and the Chairperson called for questions or comments from the Commission.

Bob Brown made a motion to approve case 20P-004 with staff's recommendations. Jeff Antonelli seconded, and the following votes were cast:

In favor:	Antonelli, Black, Blair, Brown, Hill, Hollaway
Opposed:	None
Absent:	Cook
Non-voting participant:	CM Listowski (Ex-Officio)

**The motion passed.**

**THE MEETING ADJOURNED AT 4:18 PM**



# 20P-005

# STAFF REPORT

**ADDRESS:**

4914 Avenue K

**LEGAL DESCRIPTION:**

Property is legally described as M.B. Menard Survey, Lot 17 and West 14.4 Feet of Lot 16, and the East 3.6 feet of Lot 18, Block 8, Denver Resurvey, in the City and County of Galveston, Texas.

**APPLICANT/REPRESENTATIVE:**

Melinda Medellin-Quiroga

**PROPERTY OWNER:**

Joey Quiroga and Melinda Medellin-Quiroga

**ZONING:**

Residential, Single Family ( R-1)

**REQUEST:**

Request for a replat from one (1) lot to two (2).

**STAFF RECOMMENDATION:**

Approval based on findings and conditions.

**EXHIBITS:**

- A – GIS Map and Current Survey
- B – Replat Survey

**STAFF:**

Daniel Lunsford, Planner  
 409-797-3659  
 dlunsford@galvestontx.gov

**Public Notice and Comment:**

Sent	Returned	In Favor	Opposed	No Comment
20				

Per Section 13.808 of the Land Development Regulations and state law, written public notice of this request is required. Public notices are sent to all property owners within 200 feet of the subject site and are sent to the address on file with the Galveston Central Appraisal District.

**City Department Notification Responses:**

No Objections



**Executive Summary**

The applicant is requesting a replat to increase the number of lots from one (1) to two (2), in order to construct new single-family residential structures.

The Texas Local Government Code, Chapter 212.015, requires a public hearing for replats increasing lot density in a single-family zoning district. If the plat meets the requirements of the Galveston Land Development Regulations, the review of the plat by Planning Commission is a ministerial act.

Zoning and Land Use	Location	Zoning	Land Use
	Subject Site	Residential, Single Family- Modified ( R-1)	Residential
	North	Commercial (C)	Retail
	South	Residential, Single Family- Modified ( R-1)	Residential
	East	Residential, Single Family - Modified ( R-1)	Residential
	West	Residential, Single Family- Modified ( R-1)	Residential

**Site and Surrounding Area** This property and the properties to the east, south, and west are Residential, Single Family (R-1) properties. The property to the north is Commercial (C) zoning fronting Broadway / Avenue J.

**Drainage/Public Infrastructure and Easements** There were no objections from any Public or Private Utilities. Angelo Grasso in Public Works states that the easements shown are sufficient for the front lot to receive utilities from the alley. Future water and sanitary sewer connections will be located in the 5' drainage easement on the west side of the properties.

**Minimum Lot Standards** The Residential, Single Family (R-1) zoning district lot requirements were modified for properties located, West of 25<sup>th</sup> Street, east of 61<sup>st</sup> Street, South of Broadway Boulevard, north of Seawall Boulevard. The properties in this area have no lot width or depth requirements but do require a minimum of 2,500 square feet per lot.

The replat meets the minimum standards for lots in the Residential, Single Family Modified (R-1) zoning district. Article 3, Addendum for the Residential, Single Family (R-1). This includes a 12' wide platted access for the rear lot to connect to Avenue K as required by city ordinance.

**Plat Approval Criteria** According to Section 13.502 of the Land Development Regulations, the following are the approval criteria for plats:

A. **Generally.** Preliminary plats, final plats, and development plats shall be approved if, following review by City staff, it is determined that the plat meets all applicable regulations. The staff report may include "standard conditions" that serve as a checklist of ordinary regulatory requirements, but which are not corrections or changes necessary to conform to applicable regulations.

1. If a plat is submitted to the Planning Commission with only the "standard conditions" in the staff report and no other conditions are required, then the plat will be considered to meet all applicable regulations, approval will be recommended, and the item may be placed on a consent agenda of the Planning Commission.
2. If a plat does not meet all applicable regulations, the plat will be denied, except that readily verifiable conditions may be attached to preliminary approval, the satisfaction of which becomes a prerequisite for final approval.

**Staff Recommendation**

Staff recommends approval of the request with the following conditions:

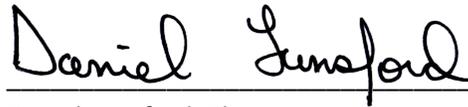
*Specific conditions to Case 20P-005:*

1. The applicant shall accommodate the filing of the plat by September 2, 2020;

*Standard conditions:*

2. The applicant shall adhere to all comments/conditions received from City Departments. Should conformance with the comments/conditions require alterations to the project, as approved, the case must be returned to the Planning Commission for consideration;
3. Planning Commission for additional review and approval. Failure to comply with all comments/conditions may result in penalties and/or revocation of this plat; and
4. The applicant shall comply with all recordation requirements; and, shall provide the Development Services Department and with all Galveston County filing fees by certified check or money order.

Respectfully Submitted,



Daniel Lunsford, Planner

02/24/2020

Date



Catherine Gorman, Assistant Director, AICP, HPO  
Development Services

02/24/2020

Date

# Zoning District Map



February 11, 2020

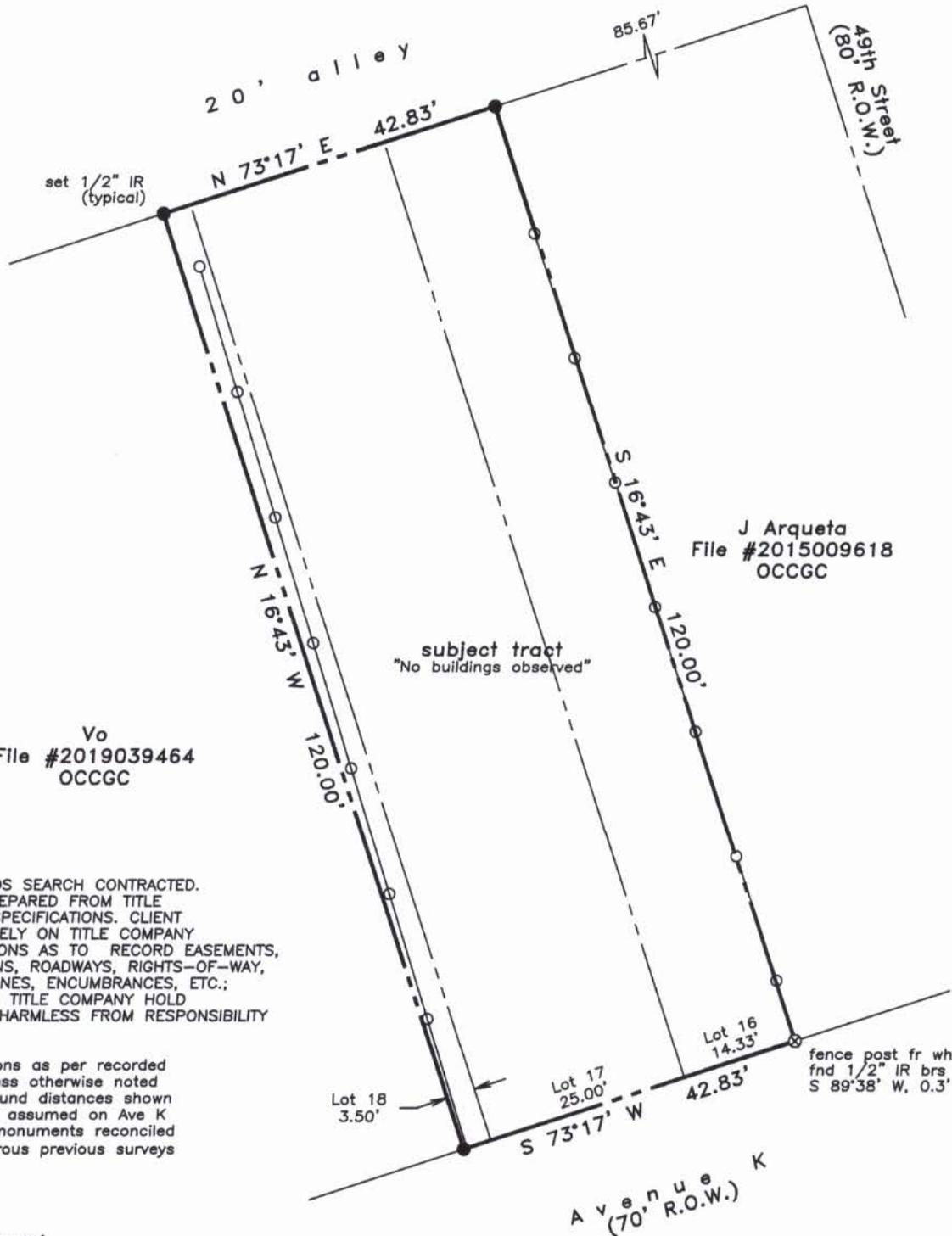
1:240

- |              |                    |                      |   |
|--------------|--------------------|----------------------|---|
| Parcels      | Water Plant        | <b>Water Main</b>    | 0 0.002 0.004 0.008 mi<br>0 10 20 40 Feet |
| Water Valve  | Fire Lead          | Existing Water Main  |   |
| Fire Hydrant | Water Service Line | Abandoned Water Main |   |
| Water Meter  |                    | Sanitary Manhole     |   |

Galveston Central Appraisal District & Pictometry  
 Galveston Central Appraisal District  
 City of Galveston - Public Works Department  
 City of Galveston Development Services: Planning & Development Division

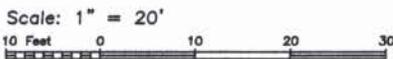
This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries. The data presented on these pages is not legally binding on the City of Galveston or any of its departments. These maps and the associated data are representations ONLY and may contain errors in the databases. Therefore, the information presented on this map is for informational purposes only and should not be construed to be legally binding.

NATIONAL FLOOD INSURANCE PROGRAM  
 FIRM Zone AE  
 Community #485469  
 Map 48167C0437G  
 August 15, 2019



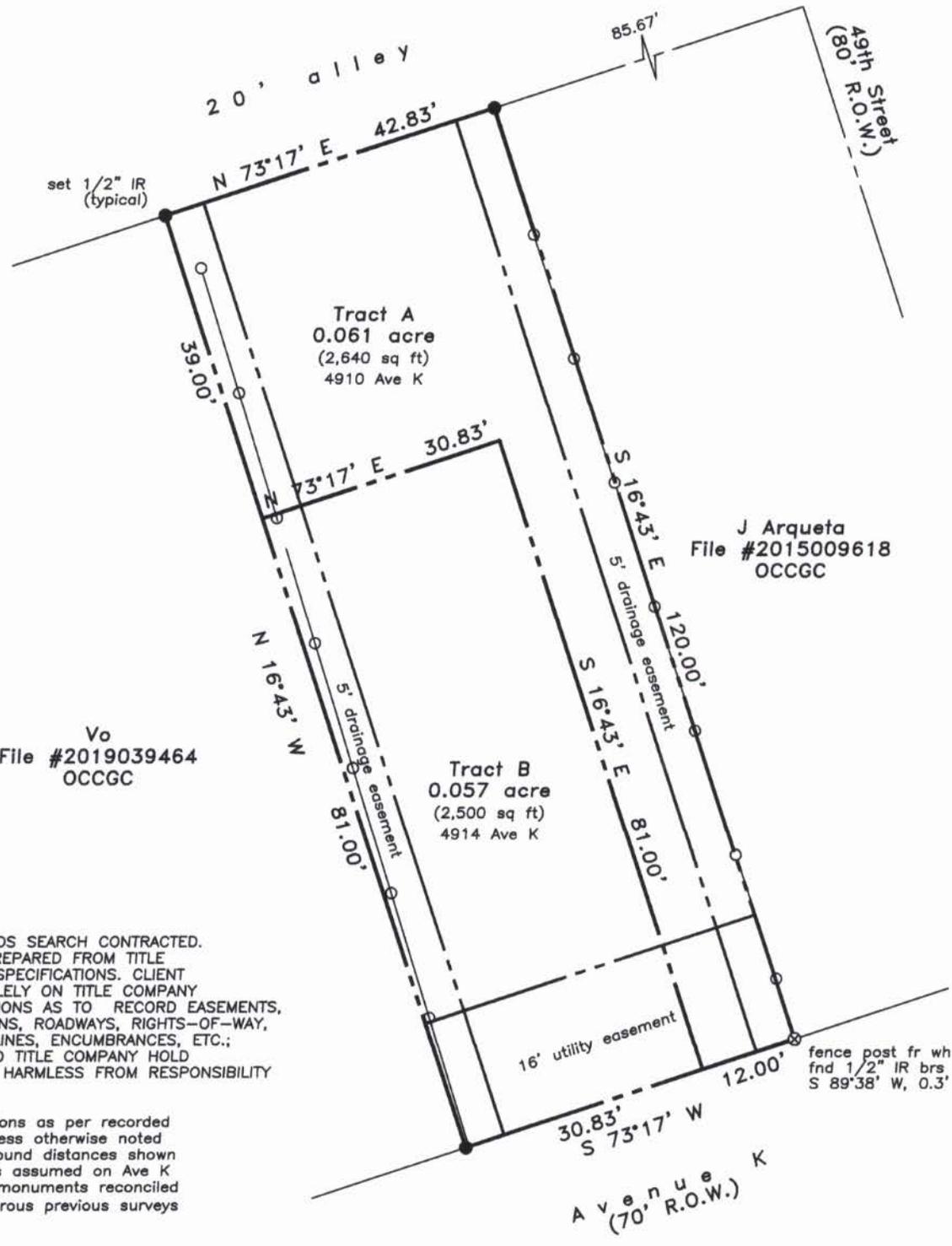
NOTES:  
 NO RECORDS SEARCH CONTRACTED.  
 SURVEY PREPARED FROM TITLE COMPANY SPECIFICATIONS. CLIENT RELIES SOLELY ON TITLE COMPANY SPECIFICATIONS AS TO RECORD EASEMENTS, RESTRICTIONS, ROADWAYS, RIGHTS-OF-WAY, BUILDING LINES, ENCUMBRANCES, ETC.; CLIENT AND TITLE COMPANY HOLD TLTS, INC. HARMLESS FROM RESPONSIBILITY FOR SAME

- Restrictions as per recorded plat unless otherwise noted
- True ground distances shown
- Bearings assumed on Ave K
- Survey monuments reconciled w/numerous previous surveys



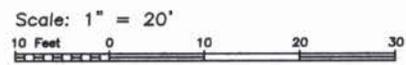
SURVEY of a tract of land being Lot 17, the West 14'-4" (14.33', call 14.00') of Lot 16 and the East 3'-6" (3.50', call 3.60') of Lot 18, in Block 8, of Denver Resurvey, a subdivision in Galveston County, Texas, according to the map or plat thereof recorded in Volume 91, Page 196, in the Office of the County Clerk of Galveston County, Texas.

NATIONAL FLOOD INSURANCE PROGRAM  
 FIRM Zone AE  
 Community #485469  
 Map 48167C0437G  
 August 15, 2019



NOTES:  
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- Restrictions as per recorded plat unless otherwise noted
- True ground distances shown
- Bearings assumed on Ave K
- Survey monuments reconciled w/numerous previous surveys



SITE PLAN of Tracts A & B of "4910 - 4914 Avenue K", a proposed replat of Lot 17 and parts of Lots 16 & 18, in Block 8, of Denver Resurvey, a subdivision in Galveston County, Texas, recorded in Volume 91, Page 196, in the Office of the County Clerk of Galveston County, Texas.



## MEMORANDUM

**TO:** Cate Black, Chair and Commissioners  
Planning Commission

**FROM:** Catherine Gorman, AICP, Assistant Director/HPO  
Development Services Department

**DATE:** February 27, 2020

**RE:** **Beach Maintenance Permits – Recommendation to City Council**

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The City Council will be discussing changes to Beach Maintenance Permits on March 24, 2020 and has requested input from the Planning Commission. Please note that the meeting has been moved from their standard meeting date.

The City Council will be discussing the changes to Beach Maintenance Permits recommended by the Beach Access and Dune Protection Plan Review Ad Hoc Committee with the understanding that any changes will not be incorporated until 2021. All permits submitted until any changes are adopted will be reviewed under the current regulations.

Attached please find a summary of the Ad Hoc Committee's recommendations that was provided to City Council in January and Staff's findings.



# City of Galveston

## DEVELOPMENT SERVICES

Coastal Resources Division

CoastalResources@GalvestonTX.Gov | 409-797-3660 | [www.galvestontx.gov](http://www.galvestontx.gov)

**To:** Honorable Jim Yarbrough, Mayor, and City Council Members

**From:** Dustin Henry, AICP  
Coastal Resources Manager  
Development Services Department

**Date:** January 23, 2020

**RE:** Item 3.D. - Beach Maintenance Permits/Beach Ad Hoc Committee Report and Update

The Beach Access and Dune Protection Plan Review Ad Hoc Committee's final report to City Council is available at this link:

[https://www.galvestontx.gov/DocumentCenter/View/10340/CompleteFinalReport toCityCouncil 07242019 Redacted](https://www.galvestontx.gov/DocumentCenter/View/10340/CompleteFinalReport%20toCityCouncil%2007242019%20Redacted)

Pages 32-45 of that report are the Ad Hoc Committee's recommendations for best practices for beach maintenance activities.

The Coastal Resources Division has reviewed the committee's recommendations, and has prepared the attached table of findings and recommendations from staff.

Staff finds that most of the Ad Hoc Committee's recommendations are reflected in existing requirements of the City's Dune Protection and Beach Access Plan and Erosion Response Plan or other municipal codes, and can therefore be incorporated in into staff reports to Planning Commission as conditions of approval of applications (those noted in green in the attached table).

There are other recommendations from the Ad Hoc Committee that staff has found to fall outside the purpose/intent of the Dune Protection Act and the Open Beaches Act (those noted in red in the attached table), and are not currently addressed in the City's Dune Protection and Beach Access Plan or Erosion Response Plan. These recommendations from the Ad Hoc Committee may require additional review by staff and discussion with Council.

Please feel free to contact me at [dhenry@galvestontx.gov](mailto:dhenry@galvestontx.gov) or (409) 797-3621 should you have any questions or require any additional information.

Sincerely,

Dustin Henry, AICP

Coastal Resources Manager  
City of Galveston

**Enclosures:** City Staff Review of Ad Hoc Committee Recommendations for Beach Maintenance (3 pages)

**xc:** Brian Maxwell, City Manager  
Don Glywasky, City Attorney  
Tim Tietjens, Director of Development Services



Ad Hoc Committee Recommendations for Beach Maintenance

Best Practice Recommendation (from Ad Hoc Committee)	Staff Finding	Applicable Ordinances/Rules	Staff Recommendation	New Ordinance / Plan Amendment Needed
A Raked seaweed will be relocated to the wrack line or to the south toe of the dune.	This is already covered under existing requirements of §(o)(6) 'Beach Maintenance Activities' in the Dune Protection and Beach Access Plan.	<b>City of Galveston BAP §(o)(6)(d)(1)</b> "...stockpiles or windrows of raked debris may be placed at the seaward toe of the primary dune seaward of the vegetation line and within 20-feet of the vegetation line."	This could be incorporated into staff reports to Planning Commission as a recommended condition of approval of permits.	No
B Parties will coordinate with ongoing sea turtle nest detection and protection programs from March 15th-Oct 1st to ensure the beaches have been patrolled prior to any beach maintenance activity.	This recommendation appears to fall outside the purpose/intent of the Dune Protection Act and the Open Beaches Act.  Not required by Ch. 63 of the Texas Natural Resources Code. Comparable policy is not found in the GLO's beach/dune rules in the Texas Administrative Code.		Additional review by staff, discussion with Council.	Yes
C A trained Wildlife Monitor, who is assigned by the Party, must walk the area to be mechanically raked immediately prior to commencement of the action and monitor the area during the entire beach maintenance activity. Any activity by Endangered Species encountered by the Monitor will constitute grounds for postponement of mechanical raking.	This recommendation appears to fall outside the purpose/intent of the Dune Protection Act and the Open Beaches Act.  Not required by Ch. 63 of the Texas Natural Resources Code. Comparable policy is not found in the GLO's beach/dune rules in the Texas Administrative Code.		Additional review by staff, discussion with Council.	Yes
D The following seaweed distribution and density thresholds must be met before beach maintenance by mechanical means can be initiated in the designated area of allowed beach maintenance: a. Area covered by USACE and City of Galveston permit: stipulated by permit Terms and Conditions of the USACE permit.	This appears to be a reference to USACE permit requirements.  GLO rules do not stipulate distribution or density thresholds.  <b>31 TAC §15.7(l)</b> says "local governments shall prohibit beach maintenance activities which will result in the significant redistribution of sand or which will significantly alter the beach profile or the line of vegetation."		The following statement could be incorporated into staff reports to Planning Commission as the following statement as a recommended condition of approval of permits:  "Beach maintenance activities may be subject to regulatory requirements of other local, state, or federal agencies. The applicant must conduct activities in accordance with other local, state, or federal permits, such as permits issued by the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers."	No

Ad Hoc Committee Recommendations for Beach Maintenance

Best Practice Recommendation (from Ad Hoc Committee)	Staff Finding	Applicable Ordinances/Rules	Staff Recommendation	New Ordinance / Plan Amendment Needed	
<b>The following are also best practices of the City of Galveston (from the Ad Hoc Committee Recommendations) :</b>					
A	Handpicking and hand raking of litter is always allowed and preferred. No permit is required.	This is written as a recommendation and not a requirement.  The GLO already encourages this type of practice.	<b>31 TAC 15 Rule § 15.7(l)</b> "The General Land Office encourages the removal of litter and other debris by handpicking or raking and strongly discourages the use of machines (except during peak visitation periods which disturb the natural balance of gains and losses in the sand budget and the natural cycle of nutrients."	Staff reports to Planning Commission could cite the GLO's rule in the TAC that also encourages this type of practice.	No
B	Relocate seaweed; do not remove seaweed.	This is covered under existing requirements of §(o)(6) 'Beach Maintenance Activities' in the Dune Protection and Beach Access Plan.	<b>City of Galveston BAP §(o)(6)(d)(1)</b> "All sand/debris collected with debris as part of this maintenance process shall remain in the stockpile or windrow."	This could be incorporated into staff reports to Planning Commission as a recommended condition of approval of permits.	No
C	No working in the wet beach.	This topic is not addressed by GLO or City beach/dune rules.		The following statement could be incorporated into staff reports to Planning Commission the following statement as a recommended condition of approval of permits:  "Beach maintenance activities may be subject to regulatory requirements of other local, state, or federal agencies. The applicant must conduct activities in accordance with other local, state, or federal permits, such as permits issued by the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers."	No
D	No driving on or disturbing dunes. No working in the dune field.	This is covered under Section 8-4 of Municipal Code, and also §(C) 'Vegetation and Topography Seaward of the Dune Protection Line' of the Dune Protection and Beach Access Plan.	Sec. 8-3(f) "No vehicle may travel or park within ten (10) feet of the dune line."  Sec. 8-4 "unlawful for any person to drive, operate or park any motor vehicle upon, over, or across any sand dune."  §(C) "...unless otherwise unavoidable during construction, removal or destruction of vegetation within the area seaward of the Dune Protection Line is prohibited."	These existing ordinances can be referenced in staff reports to Planning Commission as a recommended condition of approval of permits.  Place emphasis on no work is authorized in the dune field.	No
E	No gouging or scouring of sand.	This topic is already addressed under existing rules in the plan.	<b>City of Galveston BAP §(J)(4)(a)</b> 'Prohibited Activities' - Removal, relocation, or movement of sand, dunes or dune vegetation" is a prohibited activity.  <b>§(O)(6)(a)</b> 'Beach Maintenance Activities' - beach maintenance activities that significantly redistribute sand or alter the beach profile are prohibited.	These existing ordinances can be referenced in staff reports to Planning Commission as a recommended condition of approval of permits.	No
F	No removal of sand from beach area.	same as above	same as above	same as above	No
G	Allow dune formation by allowing for natural creep seaward of line of vegetation and growth of foredune elevation. Do not interfere with natural beach and dune processes by artificially controlling the line of vegetation or dune elevation.	This is currently addressed under existing rules in the plan.  This is also covered by 31 TAC §15.7(l) 'Maintaining the public beach'	<b>City of Galveston BAP §(J)(4)(a) and §(J)(4)(c)</b> 'Prohibited Activities' - Removal, relocation, or movement of sand, dunes or dune vegetation" is a prohibited activity.  <b>31 TAC §15.7(l)</b> 'Maintaining the public beach' - local governments shall prohibit beach maintenance activities which will significantly alter the beach profile or the line of vegetation.	These existing ordinances can be referenced in staff reports to Planning Commission as a recommended condition of approval of permits.	No

Ad Hoc Committee Recommendations for Beach Maintenance

Best Practice Recommendation (from Ad Hoc Committee)	Staff Finding	Applicable Ordinances/Rules	Staff Recommendation	New Ordinance / Plan Amendment Needed	
H	Encourage a continuous line of vegetation so that a continuous dune system can be established.	This statement is more of a policy goal than a regulation.	This aligns with Goal 7.3 of the Erosion Response Plan: "Promoting the formation of a continuous dune system is the City's long-term goal for beachfront areas beyond the limits of the Seawall."	A reference to Goal 7.3 of the ERP could be incorporated into staff reports to Planning Commission.	No
I	No disturbing wildlife.	This is not required by the existing Dune Protection and Beach Access Plan, or the Texas Administrative Code.  Appears to fall outside the purpose/intent of the Dune Protection Act and Open Beaches Act, and could be difficult for staff to enforce.		Additional review by staff, discussion with Council.	Yes
J	Beach maintenance may be undertaken when threshold criteria are met.	This appears to be a reference to USACE permit requirements.  GLO rules do not stipulate distribution or density thresholds. <b>31 TAC §15.7(I)</b> says "local governments shall prohibit beach maintenance activities which will result in the significant redistribution of sand or which will significantly alter the beach profile or the line of vegetation."		The following statement could be incorporated into staff reports to Planning Commission the following statement as a recommended condition of approval of permits:  "The applicant must conduct activities in accordance with other local, state, or federal permits, such as permits issued by the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers."	No
K	The City encourages leaving organic material in place for the benefit of the beach and wildlife.	This is written as a recommendation and not a requirement.		This could be referenced in staff reports to Planning Commission as a suggested practice.	No