

MAYOR:
Bradley D. Belt

TOWN ADMINISTRATOR:
Stephanie Tillerson

TOWN ATTORNEY:
Stafford J. McQuillin III



MAYOR PRO TEMPORE:
Russell A. Berner

COUNCIL MEMBERS:
E. Luke Farrell
Madeleine Kaye
Lance Spencer

TOWN COUNCIL
Municipal Center Council Chambers
January 6, 2026, 2025, 1:00 pm

AGENDA

- I. **Call to Order:**
- II. **Pledge of Allegiance**
- III. **Roll Call:**
- IV. **Approval of Minutes:**
 - A. Minutes of the Town Council Meeting of December 2, 2025 [Tab 1]
- V. **Citizens' Comments (Agenda Items Only):**
- VI. **Presentation:**
 - A. Internal Controls Assessment – Mauldin & Jenkins [Tab 2]
- VII. **Updates:**
 - A. Mayor
 - B. Council Members
 - C. Administrator
- VIII. **Old Business:**
 - A. To Consider Approval of **Ordinance 2025-15** – An Ordinance to Amend The Noise Standards Within the Town of Kiawah Island and to Repeal Chapter 8, Sections 15-801 Through 15-807 of the Town Municipal Code – **Second and Final Reading** [Tab 3]
- IX. **New Business:**
 - A. Appointment of the Mayor Pro Tempore [Tab 4]
 - B. Appointment of Haynsworth Sinkler Boyd as Town Attorney [Tab 5]
 - C. Appointment of the Town Treasurer/Finance Director [Tab 6]
 - D. Appointment of the Town Clerk [Tab 7]
 - E. To Consider Approval of **Ordinance 2026-01** - An Ordinance to Amend Chapter 12 – Land Use Planning and Zoning Ordinance Article II. Zoning, Division 2. Zoning Map/Districts. Sec. 12-62. Zoning Map to amend the Key Locations Map to modify the fixed dock designation to allow a floating dock at the subject property, 245 Eagle Point Road, Kiawah Island, SC. (TMS# 265-02-00-167) – **Public Hearing and First Reading** [Tab 8]
 - F. To Consider Approval of **Ordinance 2026-02** - An Ordinance to Amend Chapter 12 – Land Use Planning and Zoning Ordinance Article II. Zoning, Division 2. Zoning Map/Districts. Section 12-78. Dock Key Locations to modify the fixed dock designation to allow a floating dock at the subject property, 245 Eagle Point Road, Kiawah Island, SC. (TMS# 265-02-00-167) – **Public Hearing and First Reading** [Tab 9]

*Each speaker shall be limited to five minutes. No more than 30 minutes shall be allowed for citizen presentations, comments, and/or questions, and the time shall be divided equally among those requesting to speak.

FOIA: Notice of this meeting has been published and posted in accordance with the Freedom of Information Act and the requirements of the Town of Kiawah Island.

- G. To Consider Approval of the Appointments to the Arts & Cultural Events Council [Tab 10]
- H. To Consider Approval of the Civic and Cultural Center Addition Construction Committee Charter [Tab 11]
- I. To Consider Approval of the Amendment to the Audit Committee Charter [Tab 12]
- J. To Consider Approval of the Amendment to the Public Safety Committee Charter [Tab 13]
- K. To Consider Approval of the Design Review Board Charter [Tab 14]
- L. To Consider Approval of **Resolution 2026-01** - A Resolution to Amend the Town of Kiawah Island Planning Department Fee Schedule for the Design Review Board [Tab 15]

- 5
- X. **Executive Session:**
 - A. Executive Session to receive legal advice protected by the Attorney-Client Privilege (*S.C. Code Ann. 34-4-70-(a)(2)*) regarding pending legal matters, contract arrangements, and possible purchase of property.

Upon Returning to Open Session, the Council May Take Action on Matters Discussed in Executive Session.

- XI. **Citizens' Comments:**
- XII. **Council Member Comments:**
- XIII. **Adjournment:**

*Each speaker shall be limited to five minutes. No more than 30 minutes shall be allowed for citizen presentations, comments, and/or questions, and the time shall be divided equally among those requesting to speak.



TAB 1

TOWN COUNCIL

Agenda Item

TOWN COUNCIL
Municipal Center Council Chambers
December 2, 2025, 1:00 pm

Minutes

I. Call to Order: Mayor Belt called the meeting to order at 1:00 pm.

II. Pledge of Allegiance

III. Roll Call:

Present at the Meeting: Bradley Belt, *Mayor*
Russell Berner, *Mayor Pro Tem*
Luke Farrell, *Council Member*
Madeleine Kaye, *Council Member*
Lance Spencer, *Council Member*

Also Present: Stephanie Monroe Tillerson, *Town Administrator*
Dorota Szubert, *Finance Director*
Mac McQuillin, *Town Attorney*
John Taylor, Jr., *Planning Director*

IV. Approval of Minutes:

A. Minutes of the Town Council Meeting of November 4, 2025

B. Minutes of the Special Call Town Council Meeting of November 14, 2025

Mayor Belt stated that the minutes for the Town Council Meeting of November 4, 2025, and the Special Call Town Council Meeting of November 14, 2025, were circulated prior to the meeting. No Council Members had significant comments or edits, except for one minor administrative correction noted by Council Member Spencer.

When none were offered beyond an administrative correction, he stated that the minutes were deemed approved.

V. Citizens' Comments (Agenda Items Only):

Jennifer Hayes, Kiawah ARB (Architectural Review Board)

Ms. Hays expressed concerns about the proposed noise ordinance provision that would ban landscape equipment with two-cycle engines. She requested more information about this proposal, particularly regarding stakeholder involvement, the six-month implementation timeframe, potential impacts on landscape maintenance quality, cost implications for residents, and whether the ban would apply to tree removal work. Hayes emphasized that landscape maintenance is key to maintaining Kiawah's beautiful environment.

VI. Presentations:

A. MUSC Update - Tom Crawford, MUSC Health System Chief Operating Officer

Mr. Crawford stated that MUSC Health is firmly committed to providing 24/7, 365 emergency services to the Sea Islands community and has been working diligently over the last couple of years to put up a building which would include that freestanding emergency department, but also include a medical office building that would provide services today but actually grow additional services in the future based on the demand.

Mr. Crawford provided an update on MUSC Health's new facility, stating that the grand opening, scheduled for December 12th from 1-3 pm, is open to the public and that services will commence on December 18, 2025, at 8 am.

Mr. Crawford indicated that emergency services, as you would have at any emergency room, will be available. He explained that emergency services are largely about treating you in the event of a specific event, such as a cardiac or neurological event, a fall, or trauma, where timing is of the essence. He stated that the facility would be supported logistically with ambulances and would also have a helipad if transport to a higher level of care is required.

Mr. Crawford outlines that the facility would start with primary care, cardiology, orthopedics, and rotating subspecialties, with telehealth support, with plans to "continue to grow that based on the demand." Other services include "physical therapy in the building, non-chemo infusion, basic lab services" as well as "radiology, including CT, MRI, and X-ray, which people have to travel for now."

During questioning, Mr. Crawford confirmed that staffing would include an on-site phlebotomist, and primary care, cardiology, and orthopedics services would be available when the facility opens. He indicated that doctors would accept new patients and that transfers from other MUSC facilities would be seamless due to shared medical records. He confirmed that ambulance response on Kiawah would utilize the new facility, explaining that, along with Charleston County EMS, a partnership with Lifeguard, acclimated to providing critical care transport to hospitals, was in place as a backup provider. Also addressed were questions about the facility's trauma capabilities and staffing, as well as how residents could investigate moving their providers to the new facility.

Chairman Farrell thanked MUSC for siting the facility on Kiawah, which was greatly appreciated by the community. Mayor Belt noted that the Town provided financial support for the facility, which will include a healing garden overlooking the lake.

2025 Survey Results – Meredith Blair, Communications & Public Affairs Director

The Town conducted the 2025 customer satisfaction survey to gather community feedback. Ms. Blair presented the survey results, noting that 451 community members participated, of which 98% were full or part-time property owners.

Key findings included:

- 73% of respondents were satisfied or very satisfied with Town services (up from 69%)
- 74% were satisfied or very satisfied with Town Staff interactions (similar to last year's 73%)

Areas the Town performs well:

- Emergency preparedness (69%, down from last year's 77%)
- Environmental and wildlife support (67%, up from last year's 50%)
- Beach patrol (58%, up from last year's 55%)
- Communication (57%, slightly improved from last year's 56%)

Areas needing improvement:

- Code enforcement (44%, up from last year's 35%)
- Permitting process (40%, unchanged)
- Planning and development projects (35%, improved from last year's 56%)
- Short-term rental compliance (28%, up from last year's 24%)

Key priorities identified through resident comments included:

- Resiliency (flood mitigation, infrastructure, natural habitat preservation)
- Wildlife protection, specifically bobcats
- Traffic and main gate congestion
- Construction/development management
- Speed limit enforcement

Additional comments submitted:

- “What happened to the traffic enforcement we saw for a moment there in August? Contractors are not complying with speed limits despite claims otherwise.”
- “Limit any high-density housing or development that overtaxes the infrastructure.
- “On island access is a floodgate open to everyone and anyone who wants access. Fix the 35-minute backup at the gate for the homeowners.”
- “Development of the island must be stopped. Kiawah is a special place because of its pristine and natural beauty. If people don't want to come here to enjoy the paradise that it is, let them go somewhere else.”

When Council Member Spencer asked about the drop in emergency preparedness ratings despite improvements like the CERT team reactivation, Ms. Blair explained that she did not have any additional insight into the drop but that it kind of correlates with the participation this year, noting that the 451 community members who participated were down from the 773 respondents last year.

Mayor Belt suggested that a fresh look at how questions are composed and what is being evaluated may be needed in the future. Since the survey asked people to identify the top things they think the Town does well, the better question may be satisfaction with each service. Ms. Blair added that the presentation only provided highlights of the survey and that viewing the full survey on the Town's website or eBlast would provide a breakdown and more specific information on different services.

Council Members' discussion included that several of the comments are outside of the Town's purview, but that KICA (Kiawah Island Community Association) would be made aware that the comments were made, and if the drop in participants was linked to the time of survey release, despite extensive advertising or fewer issues are animating the community than two years ago when the survey was last done.

Council Member Kaye expressed being very encouraged by a couple of things, noting "the community seems to have become increasingly aware of resiliency issues" and that "from the wildlife perspective, the work that Mr. Jordan and his team are doing, and all of the emphasis on Bobcat Pledge, Bobcats and Bluegrass, and SGA reduction," the positive results were "a public recognition, a community wide recognition of Mr. Jordan's team and the hard work that they put forward.

VII. Updates:

A. Mayor

Mayor Belt provided several updates. First, he announced that the Town will be conducting additional tree maintenance and aesthetic improvements, along with tree health work on Kiawah Island Parkway, over the next 2 to 3 weeks, which may impact traffic. He explained this was an extension of ongoing work the Town has been doing to improve its right-of-way areas along public roads and would essentially cover the 2-mile stretch of Kiawah Island Parkway from the roundabout to the main gate.

The Mayor stated that at the last meeting, the Town approved the conveyance of a third of a mile of Betsy Kerrison Parkway from the roundabout to Resurrection Road, which includes the causeway and culvert. He noted that accepting conveyance was conditional upon obtaining a satisfactory inspection report. The state inspection confirmed all components are in good condition, with an expected lifespan of 75 years (constructed in 2005). Initial work will include re-striping to improve the turn lane at the Municipal Center, with a possible complete remilling and repaving in conjunction with the Civic and Cultural Center project.

Regarding some of the issues related to the Planning Commission's proposed recommendations on a new Beachfront Overlay, Mayor Belt noted that a public workshop will be held tomorrow afternoon at 1 o'clock and encouraged anyone interested to attend. He emphasized that "contrary to what may have been conveyed or represented by some," this had been a year-long process that began with discussions at Council's Strategic Planning Retreat last January addressing development issues along the beachfront in order to protect the maritime forest, wildlife habitat, vegetative characteristics, protect

against storm surge, and to preserve the aesthetics and character of Kiawah Island. Since the January discussions, the Planning Commission has held numerous public meetings and workshops.

Mayor Belt stated that the Council approved the first reading of the ordinance, with the understanding that additional views and perspectives would be offered. Without acting on a second reading, there was an additional public hearing at the last Council meeting, so this remains an ongoing process, emphasizing a fairly public process.

The Mayor also reported on a recent meeting with construction general contractors, noting there continues to be an extraordinary and unfortunate amount of confusion about the relative roles of the Town, KICA, and the ARB in the zoning and building permitting process. He referenced a survey that incorrectly stated "the required setbacks may be designated and or varied by the Kiawah Island Architectural Review Board. The Architectural Review Board reserves the right to grant variances respecting setback guidelines and or to expand the buildable area," and wanted to "make crystal clear for the record that the Town's Board of Zoning Appeals is the only entity which can grant variances from municipal zoning standards." He emphasized that the ARB has no authority to modify Municipal Zoning Standards. He also clarified that there is no requirement to obtain ARB approval before obtaining Town zoning and building permits.

B. Council Members

Mayor Pro Tem Burner reported on the following:

- His extensive work reviewing the architect's contract for the Civic and Cultural Facility to provide greater control over timing, scheduling, and costs, and expressed satisfaction with the final contract.
- After a meeting with the new EMS Chief, he stated that he was pleased with response times on the island, particularly when factoring in faster first response from the St. Johns fire District and Beach Patrol.
- Preparations were underway for the upcoming marathon on December 13th, with a bomb meeting scheduled for the following day. He encouraged residents to check the website for road closure information, emphasizing that "when they're closed, you're not getting through."

Mayor Belt added important information about EMS staffing changes, explaining that Charleston County EMS has moved Station 10 to a "station-based" model, meaning there would be a 24/7 presence at the station.

Council Member Kaye reported on the following:

- The Go Green Subcommittee's work with the Resort on a major composting initiative for the marathon.
- A new "Kiawah Conversations" program will launch in January as a town initiative focusing on wildlife, environment, resiliency, and sustainability topics.

Regarding marsh initiatives, Council Member Kaye emphasized that the *Beach Overlay District* should not be conflated with the marsh overlay initiative, which is more complex and involves multiple ongoing studies and projects from various organizations.

Council Member Farrell agreed with Council Member Kaye's point about distinguishing between beach and marsh overlay initiatives, explaining, "the challenges in the marsh are very different from what happens in the beach, much more dynamic and much more complicated." Given its complexity, a science-based approach is being taken, along with measures outlined in the Town's Comprehensive Plan to protect the marsh, beachfront, and river, and ultimately the island's quality of life and environment. He also shared his experience volunteering to build wire reefs and encouraged others to do the same.

Council Member Farrell reported on the following:

- The Town's budget is performing well, with revenue 37% ahead of budget (about \$700,000) and expenses up 28%, allowing an additional \$2 million to be added to reserves.

- Business license fees are being adjusted to maintain revenue neutrality despite classification changes.
- The financial processes assessment is nearly complete and will be presented in January.

Council Member Spencer thanked staff for the successful Veterans Day event, noting "we had really positive comments from the people who showed up, both veterans and people who support veterans." He also announced that the next Infrastructure and Public Works Committee (I&PWC) meeting would be on December 11th from 10 to 11 am instead of the usual first Thursday.

Council Member Spencer discussed the Kiawah Island Utility (KIU) rate increase proposal, explaining that after a Special Call I&PWC meeting with KIU and a thorough review, the Committee had no issue with the proposed rate increase. He noted the extensive state oversight and that KIU shared it would cost approximately \$750,000 to go through the process.

Regarding first readings, Council Member Spencer emphasized an important point: "First reading doesn't mean that the Council is about to approve something. Just helps us progress the process as much as anything for something that we think is directionally on target and needs more actions to come." He used the beach overlay as an example where "Lots of things are happening after that first reading to get it right."

Council Member Spencer reported that progress on cell tower upgrades is moving forward: Crown Castle, which has four sites on the island, has conducted site surveys to determine next steps, and the Planning Department is working through the approval process. He noted that Crown Castle confirmed they have support from at least one carrier for the new sites and increased coverage capacity and range. He estimated it will probably take 18 months to 2 years before we see results. When asked whether all four locations would be completed at the same time or separately, he explained that the Ocean Core site would be fast-tracked because it is the biggest issue right now, and that the others with the fewest constraints would be able to go forward.

C. Administrator

Ms. Tillerson encouraged attendance and community participation at the Planning Commission's Beach Overlay Workshop tomorrow at 1:00 pm.

Ms. Tillerson reported on the following:

- The Town is working with GoGov to improve the Kiawah Island mobile app and is also working on a website redesign, both targeted for roll-out in the first quarter of next year.
- The Citizens' Serve dashboard has been enhanced.
- Upcoming Arts and Cultural holiday special events include the "Sound of Charleston" on December 9th at 7:30 at Seabrook Island Clubhouse.
- The Town insurance has closed out the water damage claim, and the Town will receive a reimbursement of \$228,357 minus our \$3000 deductible.

When Council Member Farrell asked about changes to prevent future incidents, Ms. Tillerson confirmed that the problematic piping had been addressed, and Mayor Pro Tem Berner stated that an inspection indicated no additional dissimilar materials that caused the leak and flood.

Mr. Spicher explained that they had investigated water sensors but encountered challenges with commercial-grade equipment and accommodating the 4-inch requirement. However, Mayor Pro Tem Berner discussed a monitoring system that would electronically transmit water-use data and trigger an alarm for excessive water use.

Ms. Tillerson then indicated that she had been notified that Public Works staff was working with Coastal Burglary Alarm to install water alarms under the sink for less than \$1700 that would notify staff if water is detected.

VIII. Old Business:

A. To Consider Approval of Ordinance 2025-15 – An Ordinance to Establish Noise Standards Within the Town of Kiawah Island and to Repeal Chapter 8, Sections 15-801 Through 15-807 of the Town Municipal Code – First Reading

Mayor Belt provided background on the revised noise ordinance, noting that there had been extensive discussion of decibel levels and measurement distances, as well as a presentation on 2-cycle gas-powered engines, their environmental impacts, and cost-related issues. Council Members were then asked to make any additional suggestions or changes.

Council Member Spencer requested the inclusion of a proposed prohibition on landscaping equipment powered by 2-cycle gas engines to be phased in over a 6-month period. Also received was a request from the Resort for a minor modification to the timing of the golf course landscaping.

Ms. Tillerson explained the current ordinance allows "routine golf maintenance" to start at 6 am, "blowing of parking lots and paths" to start at 6:30 am, and "nonroutine work" to start at 7 am. The Resort has requested that the current golf course maintenance hours be maintained rather than the proposed uniform start time of 6:30 am. Also noted that an email was received from Arbor Care requesting clarification on complying with the 2-cycle engine requirement and if tree companies fall into the landscape maintenance category.

Council Member Spencer made a motion to approve the first reading of Ordinance 2025-15 to revise the noise ordinance standards with the Town of Kiawah Island, and to repeal Chapter 8, Sections 15-801 through 15-807 of the Town Municipal Code. Mayor Pro Tem Berner seconded the motion.

Mayor Pro Tem Berner identified an error in Section 15-805(e)(3), noting that golf course maintenance was prohibited only Monday through Saturday, meaning it would not be prohibited at any time on Sunday. This needed to be corrected to include all seven days.

The discussion then turned to the prohibition on two-cycle engines, with Mayor Pro Tem Berner asking about tree cutting with electric chainsaws. Council Member Spencer responded that they do make 4-cycle chainsaws that are actually a better product, having a more consistent chain speed. When asked about noise levels, Council Member Spencer confirmed they were significantly quieter than those with two-cycle engines.

Council Member Kaye questioned whether the proposed decibel levels were consistent with neighboring communities. Council Member Spencer explained that he had researched California standards and, after comparing them with the Mayor's research, agreed with the Mayor's recommendation that they were appropriate. Mayor Belt clarified that, with a couple of minor exceptions, the 70- and 60-decibel levels are consistent with the current ordinance, noting that some communities, particularly large cities, have slightly higher decibel limits.

Council Member Kaye also raised concerns about whether penalties were "sufficient to deter" violations. Mayor Belt explained that the Town's fine limit is set by state law at \$500 per violation. Council Member Spencer added that the real deterrent is the ability to revoke a business license or issue a stop-work order.

Council Member Farrell posed a philosophical question: "Are we trying to minimize noise, eliminate 2-cycle machines, or both?" Council Member Spencer responded that it was both. Mayor Belt added that 2-cycle engines not only pollute but also produce low-frequency noise that tends to penetrate walls and windows more than high-frequency noise.

Ms. Tillerson then read an email from Mr. Sammy Miller with Arbor Care seeking clarification about whether the two-cycle prohibition would apply to tree care companies. Mayor Belt invited Mr. Miller to speak.

Mr. Miller explained his concerns about electric equipment for tree work: "If you have someone 90 feet up in a tree and the battery goes out while you're in the middle of a cut, that becomes a major safety issue." He also raised concerns about the delineation between landscape and tree care companies that use wood chippers, which operate at over 80 decibels.

When asked about four-cycle chainsaws, Mr. Miller stated that everything on the market right now used in a commercial setting is 2-cycle. New products are being introduced, but the durability technology is not quite there on a commercial level.

Council Members engaged in an in-depth discussion about the delineation between landscape and other service companies, how the two-cycle engine prohibition would affect tree care companies, clarifying that wood chippers with diesel engines would not be affected by the two-cycle prohibition, and whether Council Member Farrell's suggestion to extend the phase-in period from 6 months to 1 year, allowing more time to find new equipment, would be beneficial.

Roger Warren from the Resort expressed concern about the effect of the prohibition on the many contractors who come to the island to work with 2-cycle engine tools. He encouraged looking into an unintended consequence: the contractors may decide not to come out to Kiawah if the change isn't worth it. He noted that if the change from 2-cycle to 4-cycle can be achieved with no loss of time or efficiency and with quality work done in the same amount of time, there's no reason not to do it, but he felt that some supporting data would help him better understand. Mayor Belt responded that the examination focused on how other communities had implemented the transition, also citing the recent Landscape RFP in which all but one company indicated they could be all-electric at the outset or in a phased period.

Discussion then turned to the classification of KICA maintenance operations. Ms. Tillerson stated that KICA has a full maintenance crew by 7:00 am and sometimes as early as 6:00 or 6:30 am. KICA, currently defined as a commercial landscape, cannot start until 8:00 am and would lose an hour of work; therefore, Ms. White is asking to be considered under the same conditions as the Resort. Council Member Farrell agreed to give KICA the same hours as the golf courses. Mayor Belt indicated he was not opposed, but questioned whether the golf course maintenance category would apply to KICA.

Mr. DeStefano, a former KICA board member, stated that the reason they want to be able to start early is to blow the main roads before 7:00 am, when all the commercial traffic comes onto the island.

After extensive discussion, the Council agreed to approve the ordinance on first reading with the following changes: extending the two-cycle engine prohibition phase-in from 6 months to 12 months, adding the Resort's requested golf course maintenance schedule variations, correcting the days of the week error, planning to provide some accommodation for KICA's maintenance needs, and further examination of tree work and the full array of issues between 2 and 4 cycle equipment between first and second reading.

Following the discussion, the motion to approve Ordinance 2025-15 on first reading with the discussed amendments was unanimously approved.

B. To Consider Approval of Ordinance 2025-17 - An Ordinance to Amend Article 4, Finance and Taxation, Chapter 3, Municipal Business Licenses, Section 4-321. – Classification and Rates, Appendix A - Business License Rate Schedule and Appendix B - Business License Class Schedule - Second and Final Reading

Ms. Szubert began her presentation by stating that this was the second reading of the ordinance and explained that it contained two key items. First, she detailed the classification changes that require approval of the updated class schedule, which is required by South Carolina law. Every couple of years, the IRS evaluates the business license classes and may make changes to the classes. She specifically

noted that the current change, about 1800 businesses, will change classes. The majority are short-term rental and management companies that will go from class 7 to class 8.

Ms. Szubert stated that the revenue implications of the classification changes would be a drop in business license revenues of approximately \$65,000. At the first reading, the staff recommended not changing the rates, but the staff now recommends slightly increasing business license fees to offset potential revenue losses from these classification changes. The proposal would leave the base rate unchanged while increasing the rate per \$1,000 by \$0.10. She noted that assuming businesses report the same revenue as the previous year, this adjustment should allow the Town to break even despite the classification changes.

Chairman Farrell provided additional context, explaining that the state drives this, that classification changes can only be made every two years, and that the Town has not changed the rates in four years despite inflation. The rate adjustment was calculated very close to the break-even point, keeping the increase as low as possible while still covering all costs without generating additional revenue. He emphasized the changes would be "revenue neutral" to the Town.

Mayor Pro Tem Bernerr made a motion to approve the second and final reading of Ordinance 2025-17, with the updated class schedule and a \$0.10 increase in the rate after \$1,000 in gross receipts. Council Member Kaye seconded the motion.

Mayor Belt clarified that what they were approving on second reading differed from first reading, as the chair of the Ways and Means Committee had been absent at the previous meeting and had since had further conversations with Ms. Szubert," leading to the recommendation for the revenue-neutral approach rather than not making any adjustment and having a potential \$65,000 shortfall.

Following the discussion, the motion was unanimously approved.

C. To Consider Approval of Ordinance 2025-22 - An Ordinance to Establish a Town of Kiawah Island Design Review Board and Process for Architectural Design Review.- Second and Final Reading

Council Member Berner made a motion to approve the second and final reading of Ordinance 2025-22 to establish a Town of Kiawah Island Design Review Board and process for Architectural Design Review. Council Member Kaye seconded the motion.

Mr. Taylor presented the proposed ordinance, explaining that it establishes a Design Review Board (DRB) for the Town of Kiawah Island, independent of any existing architectural review controls. He noted that at the Planning Commission's November meeting, they recommended approval and made "very minor changes" to ensure consistency in the language across sections 12-130 – Design Standards and 12-24(2), which establishes the Design Review Board.

Mr. Taylor emphasized that the ordinance would apply "only to commercial multifamily development" and would not include "single-family residential outside those particular properties which are not governed or administered by an existing architectural review board," such as certain properties on Eugenia Avenue.

Mr. Taylor stated that there continued to be community concern about the timing of this effort relative to ongoing discussions regarding the transition of the existing Kiawah Island Architectural Review Board to the Kiawah Island Community Association. He indicated that staff supports this ordinance moving forward and highlighted that any transition of the existing Architectural Review Board to the Community Association would not include any properties outside the Community Association's jurisdiction.

Mayor Belt provided an extensive background, explaining that the process began about 2 years ago, following a Council strategic planning session, at which he proposed establishing a joint Town/KICA task force to review issues related to architectural control. Participants invested significant time and effort to facilitate the transfer of architectural control from the developer to the homeowners' association for single-family properties. He expressed his belief that "architectural control, the set of

considerations, should be primarily reviewed within an HOA by the HOA itself and a subordinate body thereof."

Mayor Belt noted his frustration that despite a commitment made "a year and a half ago or maybe more" by one of the Kiawah Partners to transfer control, "That hasn't happened." He explained that the ordinance was "an outgrowth of the lack of any kind of progress" and that recent statements suggested the developer might only transfer single-family review, not commercial or multifamily.

Mr. Taylor added that the Planning Commission had preliminary conversations on potentially combining the Landscape and Tree Preservation Board with the future Design Review Board. He also provided clarification on compliance issues in Section 12-130.

Mr. Roger Warren from the Resort expressed significant concerns about the dual review process that would result, stating "what this forces us to do is go through an ARB process with the Community Association or whomever is going to have that body for the private, because we're part of that we're we're resident there, we will have to go through 2 processes."

The Council Members engaged in an in-depth discussion of Mr. Warren's comments on a dual ARB commercial review process, issues with the current ARB, and Mayor Pro Tem Berner's suggestion to include a trigger that would make this ordinance effective when KICA agrees not to be responsible for providing the ARB for commercial properties.

Mr. Warren stated: "I've been here 23 years, and we've built multiple projects, commercial projects, renovated multiple commercial projects. They are well constituted to handle that process. The ARB is well constituted. " They have done a great job," he asked the Council to consider whether this is the right thing to do right now.

Council Member Kaye proposed a compromise, suggesting the ordinance could allow the existing (the Partner's) ARB to go ahead and have authority for projects behind the gate. At the same time, the Town's board would handle anything that's happening outside the gate.

Mayor Pro Tem Berner suggested tabling the ordinance to discuss with KICA, separating single-family from commercial review. However, Mayor Belt responded that while he had some of those bilateral conversations, the reality was "promises have been made for literally years, and nothing's happened with regard to this."

Ms. Carol Mendendorp asked that Council consider whether the process for multifamily already includes the regine HOA and the ARB, and whether adding an additional layer to the currently established process would be necessary.

Ms. Beverly Farrell, a former ARB panel member, spoke to clarify that during the two-year task force process, asking "did we ever talk about separating multifamily home, patty home, single family home, commercial? It was one ARB. We never spoke about separating it out." She noted that according to the general covenants, "all owners, property owners, are subject to the ARB." She referenced the community presentation, which covered all properties. She also noted that, over the last year, there have been further discussions between KICA and the Partners regarding the transition plan, so it has not been tabled or ignored. In response to Council Member Farrell's question, she clarifies that the KICA general covenants do not specify a transfer date but state only that the Partners make the decision.

Mr. David DeStefano, another former task force member, provided additional context about the transition timeline: "Even if they said today, we're going to transition, KICA's plan for the transition, at a minimum, was going to take 2 to 3 years to complete the transition." He explained that KICA would have to "start hiring staff with nothing to do" at a cost of "close to half to 3 quarter of a million dollars to get to the end without the revenue coming in to offset that."

Council Member Spencer strongly supported moving forward, stating that we are hearing all these protracted timelines: 2 years, 4 years, 3 years... and it's not getting done. In the meantime, the Town has a duty to do something in the absence of something getting done.

Mr. Mark Permar from Kiawah Partners confirmed there had been "no discussion about separation of land use type. It's always been considered a whole." He explained that new KICA staff would learn through a phased approach, beginning with maintenance, then modification of existing buildings, then substantial improvements, and finally new construction. When pressed by Mayor Belt to commit to a specific transition date, Mr. Permar could not provide one, stating only that discussions about "the sequence and exact calendar date of where it would start to activate for each phase" were ongoing.

Mayor Belt asked whether the ARB would hold public meetings, conduct a transparent review and appeal process, and allow all impacted stakeholders to be involved. To which Mr. Permar responded that he "could see no reason to change the pattern that has been existing since inception."

After extensive debate, Council Member Kaye proposed going ahead with the ordinance as it stands, including an addendum that, if architectural control is transferred to KICA by June 30, 2026, at that point, the Town will revisit this particular ordinance."

The Council agreed to include this provision, with Mayor Belt stating the specific language: "that it is the sense of the Council to the extent that transfer of architectural control is affected from Kiawah Partners to the Kiawah Island Community Association on or before June 30, 2026, that the Council will revisit this ordinance and consider an appropriate carve out or a waiver from the application of these provisions to properties subject to those KICA covenants." He also clarified that the ordinance's effective date is today.

Council Member Kaye made a motion to amend Ordinance 2025-22 to include the June 30, 2026, provision. Council Member Spencer seconded the motion, and it was unanimously approved.

Following the discussion, the motion to approve the second and final reading of Ordinance 2025-22 as amended was unanimously approved.

IX. New Business:

A. To Consider Approval of the 2026 Town Meeting Schedules

The proposed 2026 meeting schedule was presented. Council Member Kaye requested two deletions: "for Environmental Committee, delete July 15" and "For Resiliency, delete July 22."

Council Member Kaye made a motion to approve the 2026 Town Meeting Schedule with the requested deletions, and it was unanimously approved.

B. Discussion of the Charitable Grants Guidelines and Applications

Ms. Tillerson led a discussion about adding a fourth category, Education, to the Town's charitable giving program. She explained that historically, the Town had focused on "Hunger, Health, and Housing" as the three primary categories, which were "memorialized back 2 years ago."

Reviewing recent giving patterns, Ms. Tillerson noted that in 2023, grants were distributed evenly among the three categories. In 2024, it shifted to "51 percent" for Hunger, "38 percent" for Health, and "11 percent" for Housing. The current year showed another shift with "50 percent" for Hunger, "27 percent" for Health, and "20 percent" for Housing.

Staff recommended creating a fourth category called "youth enrichment" to encompass programs like Camp High Hope, Charleston Area Therapeutic Riding, and the First Serve Foundation that really didn't fit the Health, Hunger, or Housing categories but had been funded in the past.

Regarding administrative expense guidelines, Ms. Tillerson presented research showing "7 out of 10 charities" rated by Charity Navigator "spend at least 70 percent of expenses directly on programs." She also noted that organizations with higher admin costs could still be funded if they provided an

explanation. Council Member Farrell suggested "a bare minimum of 70 percent, with an effort to target institutions at 85 percent non-administrative fees."

Council Members engaged in extensive discussion about the nature of this fourth category. Ms. Tillerson explained that "Youth Programs" would include educational support, therapeutic recreation, structured summer and after-school activities, or sports-based development. Mayor Pro Tem Berner stated that he would rather focus on academics rather than broader enrichment programs. Council Member Kaye countered that she would have a looser definition of education.

After the discussion, the Council agreed to change the category name from "Youth Enrichment" to simply "Education." Ms. Tillerson confirmed the definition would include "educational support, tutoring, literacy programs, workforce readiness, or STEM education for underserved students."

Ms. Tillerson reviewed the agreed-upon changes:

- Add "Education" as a fourth category to the existing "Hunger, Health, and Housing" categories
- Establish a 70% minimum program expense threshold with preference for organizations at 85%
- Implementation of a mid-year progress report from grant recipients

The Council also agreed to increase the charitable giving cap from \$200,000 to \$250,000, with several members noting it had not been adjusted in several years.

C. Discussion of the Ad-Hoc Civic and Cultural Center Addition Construction Committee Charter

Mayor Belt introduced the draft charter for the Ad-Hoc Civic and Cultural Center Addition Construction Committee, noting that there was no need to formally appoint a committee at this time, but that the need would arise in the near future, so he was requesting Council input.

Mayor Pro Tem Berner suggested reducing the membership from seven to five. Mayor Belt indicated that he was inclined to start with five, but to allow for adding someone who you find has a particular construction or commercial construction background, not identified at the outset.

Council Member Farrell expressed concern about having Council involvement focused solely on finances, to which Mayor Belt suggested establishing a separate ad hoc committee to address financial issues and asked Council Member Farrell to take on the task of establishing it.

Council Member Spencer questioned the Council's role in making key design and construction decisions before they are made. Also discussed were what decisions should require full Council approval.

Mayor Pro Tem Berner indicated that, customarily, there will be reviews at the 50 percent schematic and 50 percent conceptual phases and asked whether the Council would receive regular updates or reports at every Council meeting. Mayor Belt confirmed that there would be a brief discussion on "what's happening" along with questions and comments.

Council Members expressed interest in regular updates at council meetings and identified milestone decision points. Ms. Tillerson offered to consult with Steve Coe, the architect, to identify key decision points to incorporate into the charter.

The discussion touched on various aspects of the project, including the challenge of fitting the project within the \$9,500,000 building cost and \$12,000,00 for soft costs and contingencies specified in the architect's contract. Mayor Belt discussed some specific design challenges already noted in the current design.

Council Members also discussed whether the Town would need to purchase a grand piano, with suggestions that it could be a fundraising opportunity.

X. Citizens' Comments:

No citizens came forward for comments.

XI. Council Member Comments:

Council Member Farrell reiterated his encouragement for residents to "Sign up to do manufactured wire reefs."

XII. Adjournment:

With no further business, Mayor Belt adjourned the meeting at 4:48 pm.

Submitted by,

Petra S. Reynolds, Town Clerk

Date

DRAFT



TAB 2

TOWN COUNCIL

Agenda Item

**Operational and Performance Assessment:
*Finance Department***

Executive Summary



Prepared for:

Town of Kiawah Island, SC

December 2025



Executive Summary

Introduction, Scope, and Approach

The Town of Kiawah Island (“Town,” “Kiawah Island,” or “ToKI”) engaged Mauldin & Jenkins (“M&J”) to conduct an Operational and Performance Assessment of the Town’s Finance Department, including both qualitative assessments of Finance Department operations and structured sample testing of Finance Department performance and adherence to internal control policies and procedures. The objectives of the Operational and Performance Assessment include developing an understanding of the Town’s current financial operational environment, identifying both areas of strength and potential risks, comparing ToKI operations to leading practices, and developing meaningful recommendations for enhancing Kiawah Island’s financial operations.

M&J structured its assessment of Town operations and performance based on M&J’s proprietary COMPASS methodology. M&J began by requesting and reviewing significant amounts of data and documentation from the Town and using the collected data and documentation to conduct a high-level Inherent Risk Assessment of Kiawah Island’s finance-related functions. M&J used the Inherent Risk Assessment to guide and prioritize the remainder of its fieldwork and analysis. M&J then performed its primary evaluation, which included a qualitative evaluation of the Town’s operations, informed by M&J’s review of relevant governing and operational documents, interviews with relevant Town management and staff, and “job shadowing” of staff as they conducted key financial processes, and through sample testing performed on ToKI financial records to assess performance and adherence with financial controls across risk areas identified in the Inherent Risk Assessment.

M&J’s testing identified no significant gaps in the Town’s internal control procedures. M&J’s report does contain findings, observations, and associated recommendations for further enhancing financial operations and controls.

Findings

M&J’s report on its Operational and Performance Assessment of the Town’s Finance Department contains two findings. The findings included in the report do not represent a material impact on the Town’s current financial position.

In its first finding, M&J identified that the Town’s current credit card policies do not prohibit cardholders from lending out Town-issued credit cards to other Kiawah Island officials or staff or regulate how cardholders that do elect to lend out their cards are to do so. While M&J did not identify any instances of unauthorized or fraudulent credit card use during its credit card sample testing, M&J determined that this lack of guiding regulations does rise to the level of a finding. M&J recommends that the Town develops a thorough policy regulating credit card custody and lending.

In its second finding, M&J identified that the Town was not able to consistently provide sufficient documentation to support thorough sample testing of all sampled procurement activity, including one sampled purchase for which the Town was unable to provide any relevant documentation and at least four other samples for which the Town was only able to provide partial documentation. While M&J’s evaluation of the provided documentation did not contain any indications of fraud, waste, or abuse within the purchasing process, the absence of certain documentation prevented a complete review and rises to the level of a finding. M&J recommends that the Town refines its policies and procedures related to the creation, collection, and retention of procurement-related documentation.

Observations and Recommendations

In addition to the two findings and their associated recommendations, M&J’s report contains 17 observations and associated recommendations. Figure 1 summarizes M&J’s 19 total recommendations, broken down by the “theme” of the recommendation, while Figure 2 summarizes the 19 recommendations, broken down by subject area.

Figure 1: Compiled Recommendations by Theme

Theme	Associated Recommendation(s)
Documentation/Standardization	2, 3, 13(a+b), 15, 16, 17, 18(a+b), 19
Controls/Security	1, 4, 5(a+b), 6, 9, 10, 11, 12
Process Optimization	7, 8, 14(a+b+c)

Figure 2: Compiled Recommendations by Subject Area

Subject Area	Associated Recommendation(s)
Finance-wide or Multiple	3, 4, 5(a+b), 6, 7
Accounts Payable	8, 9, 10, 11, 12, 18(a+b), 19
Credit Card	1, 13(a+b), 14(a+b+c), 15
Purchasing and Procurement	2, 16
Debt Management	17

M&J’s recommendations represent options for how observations can be addressed, but do not represent all viable options. The Town has the ultimate responsibility to determine which, if any of the recommendations to implement, and the timing of such implementation. The Town may make strategic decisions that warrant recommendations not being implemented exactly as stated in the report, such as determining solutions that address the situation in a different manner while still achieving a positive outcome.

Conclusion

M&J commends the Town of Kiawah Island’s leadership for commencing this Operational and Performance Assessment. Overall, M&J found that the Town’s internal controls:

- Are adequately designed to achieve their intended purpose,
- Have actually and consistently been implemented, and
- Generally function as designed.

The Finance Department is a mature department, currently operating efficiently in certain ways and has a number of effective controls in place. The Town now better understands the Finance Department’s current state and has a roadmap for continual improvement into the future.

Operational and Performance Assessment: *Finance Department*



Prepared for:
Town of Kiawah Island, SC
December 2025



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2. Overview and Background

Kiawah Island is a barrier island roughly 25 miles southwest of Charleston, SC, located between the Atlantic Ocean and Johns Island. The Town of Kiawah Island (“Town,” “Kiawah Island,” or “ToKI”), incorporated in 1988, contains the entirety of the island as well as small areas of nearby Johns Island and Seabrook Island. The Town is primarily composed of residential areas, resort amenities (including hotels, golf courses, and conference centers), and natural lands, along with one retail development. The Town operates as a Mayor-Council government, led by an elected Mayor and four elected members of the Town Council. The Town’s stated mission is “to protect and preserve the community’s residential character and the Island’s unique natural environment while supporting the economic vitality of the resort and other commercial enterprises.”

“The secret of change is to focus all your energy, not on fighting the old, but on building the new.” – Socrates

The Town sought to conduct an Operational and Performance Assessment of the Town’s Finance Department in order to evaluate the effectiveness of the Town’s financial controls and identify process improvements that may improve administrative efficiency. The Town engaged Mauldin & Jenkins (“M&J”) to conduct the Operational and Performance Assessment. This report contains the results of M&J’s Operational and Performance Assessment (“Assessment”) of the Town’s Finance Department.

M&J commends the Town’s leadership for proactively deciding to conduct the Operational and Performance Assessment of the Finance Department’s operations. The Finance Department plays an essential role in the Town’s ability to provide effective, efficient, transparent, and equitable service to other Town departments as well as the Town’s residents, visitors, and businesses. As an internal service department, the Finance Department is integral to all aspects of the Town’s operations and is responsible for helping prevent fraud, waste, and/or abuse of taxpayer funds. By conducting this Operational and Performance Assessment, which goes above and beyond the evaluation completed as part of the Town’s annual Financial Audit, the Town’s leadership and administration is demonstrating its commitment to providing the Town’s citizens and stakeholders with efficient and leading services.

M&J would like to thank the Town employees and leaders who gave their time coordinating logistics, participating in interviews, and providing requested information. The Town’s financial personnel were appreciative of the opportunity to update processes and controls in order to improve service delivery and were invaluable in the execution of this Assessment.

This report contains M&J’s findings and observations from its Operational and Performance Assessment of the Town’s Finance Department, including both strengths and opportunities for improvement. This report also provides numerous recommendations for how the Town can optimize service delivery going forward, including both high-level organizational and management changes as well as specific process optimizations. Town management has the ultimate responsibility to determine which, if any, of the included recommendations are to be implemented and the timing of such implementation. Implementing positive change is never easy, but by recognizing certain environmental impacts and clearly articulating the rationale and benefits of the desired change, the Finance Department can further enhance its operations while helping ensure that public funds are appropriately safeguarded.

3. Scope and Approach

This section details the scope and approach performed by M&J to conduct the Operational and Performance Assessment of Kiawah Island’s Finance Department.

Scope

The Operational and Performance Assessment is focused on the Town’s Finance Department, although conducting a full evaluation of the Finance Department’s functions entailed working with ToKI leadership and other Town departments as relevant.

Objectives and Goals

The goals of the Operational and Performance Assessment are to assist the Town in optimizing finance operations and service delivery models for efficiency and effectiveness; best leverage current systems and resources; reduce risk and maintain compliance; increase transparency and accountability; and help ensure that internal controls, compliance measures, and the use of leading practices are established and consistently implemented.

Assessment objectives include:

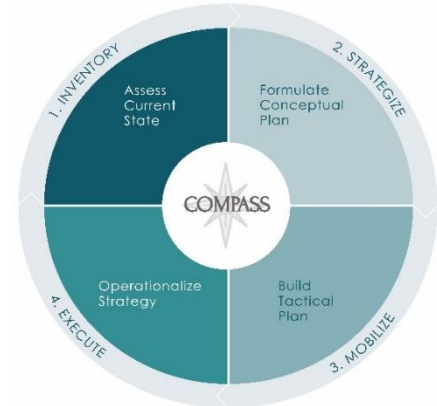
- Understanding and documenting a high-level picture of the current environment
 - Governance
 - Operating environment
 - Controls/Control gaps (if applicable)
 - Financial activities and management
 - Organizational structures
 - Key workflow and business practices
- Identifying “what is working well,” “what needs improvement,” and “areas for potential risk or concern”
- Comparing operations to leading practices
- Identifying areas that are performing well to replicate throughout the Town
- Identifying areas for improvement
- Developing meaningful recommendations to improve/enhance department operations
- Developing a Strategic Roadmap for implementation of recommendations

Approach

The approach for the Operational and Performance Assessment was based on M&J’s proprietary transformation methodology – COMPASS. The COMPASS methodology was developed based on best practices, client input, and proven project and change management activities; and served as the framework for the Assessment.

M&J developed a workplan for the Operational and Performance Assessment which consisted of the following four phases:

1. Initiation and Planning
2. Information Gathering
3. Fieldwork and Data Analysis
4. Validation and Reporting



As part of the Operational and Performance Assessment, M&J performed the following key tasks to assist in formulating our findings, observations, and recommendations:

- Requested and reviewed significant amounts of data and information such as:
 - Organizational charts and staffing information
 - Job descriptions
 - Policies and procedures, workflow documents, and other job aids
 - Governing documents
 - Meeting minutes
 - Purchasing records
 - General ledger reports
 - Budget documents
 - Credit card statements and supporting documentation
 - Accounts Payable (“AP”) records
 - Accounts Receivable (“AR”) records
 - Bank and investment account statements
 - Vendor files
 - Capital asset and technology inventories
 - Strategic plans
- Developed a high-level Inherent Risk Assessment of ToKI’s finance-related functions to assist M&J in prioritizing evaluation, analysis, and sample testing
- Conducted interviews with Town leadership, key management, and finance service delivery personnel

- Performed “job shadowing” of Finance Department staff as they executed key financial processes
- Identified and tested samples of Town financial activity from the past three fiscal years (Fiscal Year 2023 [“FY23”], FY24, and FY25) related to AP, credit card usage, AR, procurement, payroll, treasury management, debt management, and grants administration and management

This report represents the culmination of M&J’s work and presents recommendations for implementation. Town management has the ultimate responsibility to determine which, if any, of the included recommendations are to be implemented and the timing of such implementation. This report details M&J’s analysis and fieldwork completed between July and October of 2025.

4. Current State

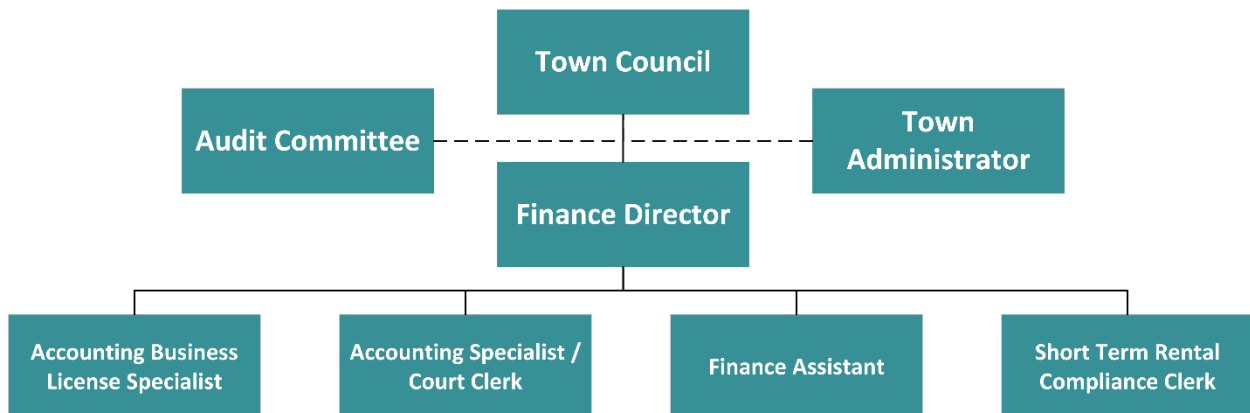
Introduction/Overview

The Finance Department plays an essential role in the Town’s ability to provide effective, efficient, transparent, and equitable service to internal departments, as well as residents, visitors, and local businesses. As an internal service department, the Finance Department is crucial to all aspects of ToKI’s operations, including budgeting and financial planning; purchasing, vendor management, and AP; payroll processing; revenue collection, billing, and AR; and financial reporting and oversight. Other Town departments regularly interface with the Finance Department. Town residents and businesses also regularly conduct business directly with the Finance Department through its involvement in the billing and collection of several different Town revenue sources, including building permit fees, business license fees, and solid waste service charges.

Organization and Staffing

The Finance Department is led by the Finance Director, who also serves as the Town’s Treasurer. The Finance Department houses four other positions, each of which report directly to the Finance Director. The Finance Department’s four positions reporting to the Finance Director include an Accounting Business License Specialist, an Accounting Specialist/Court Clerk, a Finance Assistant, and a Short Term Rental (“STR”) Compliance Clerk. Figure 3 shows the Finance Department’s organization.

Figure 3: Finance Department Organizational Chart



While not organizationally housed within the Finance Department, a Permit Technician (based in the ToKI’s Development Services Department) is included within M&J’s review due to their close involvement with various financial processes, including the billing and collection of building permit payments.

Finance Director

The Finance Director is responsible for overseeing Finance Department operations and assisting Town leadership with developing and implementing the financial aspects of the Town's planning and strategy. The Finance Director's involvement with day-to-day financial operations primarily consists of reviewing and approving work performed by other Finance Department staff, including the Accounting Business License Specialist and Accounting Specialist/Court Clerk. Work reviewed by the Finance Director includes payroll, weekly check runs, and monthly deposit summaries. The Finance Director also performs a certain finance-related processes directly themselves, including performing the monthly bank reconciliation. The Finance Director also manages the Town's participation in its annual financial audit.

Accounting Business License Specialist

The Accounting Business License Specialist performs a variety of roles within the Finance Department. As indicated by their title, one of the Accounting Business License Specialist's primary functions is the processing of business license applications, including new applications and annual renewals. The Accounting Business License Specialist also performs a variety of other tasks related to general financial processing and administration, including processing payroll, depositing cash receipts and processing AR, and processing monthly credit card reconciliations. The Accounting Business License Specialist is also the only Finance Department employee that is issued a Town credit card.

Accounting Specialist/Court Clerk

The Accounting Specialist/Court Clerk is responsible for conducting a number of Kiawah Island's financial processes. Many of the Accounting Specialist/Court Clerk's financial responsibilities are related to processing payments to the Town's various vendors, including processing invoices, preparing the weekly check run, performing monthly reconciliations of the credit accounts that the Town hold with several select vendors, and managing vendor profiles in Incode – the Town's enterprise resource planning ("ERP") software suite. The Accounting Specialist/Court Clerk also performs several other financial processes, including managing the billing and receiving of solid waste service charges as well as financial processes related to Kiawah Island's Municipal Court, such as collecting Court-imposed payments and preparing monthly fine schedule reports for the State of South Carolina Treasurer. The Accounting Specialist/Court Clerk also performs several non-financial processes for the Court Clerk portion of their role, including tracking case statuses, which are not included within the scope of this report.

Finance Assistant

The Finance Assistant's duties have recently shifted to include more financial duties. The Finance Assistant processes mail addressed to the Town, which regularly includes mailed check payments. The Finance Assistant identifies any checks when processing mail, records the checks in a mail log, and delivers the checks to other Finance Department staff for depositing and AR processing. The Finance Assistant receives calls about waste service issues and works with the Town's contracted vendor to resolve. The Finance Assistant is also cross-trained in receiving payments and serves to back up various other Finance Department staff in receiving certain types of revenues. The Finance Assistant has also recently taken on several other duties related to processing and researching business license applications, reviewing for businesses operating in the Town without an active business license, and assisting in bringing these businesses into compliance. The Finance Assistant also has capacity to assist with additional review or special projects, such as an upcoming project to review franchise fee payment accuracy.

Short Term Rental (“STR”) Compliance Clerk

The STR Compliance Clerk (also referred to as the STR Compliance Specialist in certain Town documents) manages the administration of the Town’s STR licenses, which are required to operate a STR property in the Town. The STR Compliance Clerk processes applications for new STR licenses as well as STR license renewals, including billing and receiving STR license fees. The STR Compliance Clerk also works with the Town’s code compliance and enforcement staff, within the Development Services Department, to help verify that Kiawah Island properties are operating in compliance with the Town’s STR licensing requirements. The Town’s code compliance and enforcement staff perform all in-field operations and issue citations to properties violating Town ordinances, while the STR Compliance Clerk identifies properties for further investigation, both by evaluating Town records (*e.g.*, reviewing STR renewal records to identify properties that may be operating under an expired license) and conducting external research (*e.g.*, reviewing property listing websites to identify properties listed for rental that do not have licenses). The STR Compliance Clerk manages the town’s communications with STR license holders and applicants.

Permit Technician

While not included within the Finance Department in the Town’s organizational structure, many of the key functions performed by the Permit Technician are financial in nature. The Permit Technician manages non-technical aspects of the Town’s zoning and building permitting systems, including receiving applications, billing permitting fees and receiving zoning/building permit fee payments, and issuing zoning/building permits once approved by the appropriate technical staff within the Development Services Department.

Governance

As part of the Finance Department assessment, M&J evaluated the governance of the Town’s financial processes and procedures, including Finance-related policies, procedures, and other forms of documentation; the Town’s ethics policy; and the Town’s security and accounts management policies.

Policies and Procedures

M&J reviewed a variety of Finance Department policy, procedure, and workflow documents. The Town maintains an Accounting Policies and Procedures guide that documents most internal Finance Department policies and procedures, including sections detailing the preparation of financial reports, treasury management, cash management, receiving payments, processing check runs, processing payroll, and managing debt. The Accounting Policies and Procedures guide also contains a number of useful references, including brief introductions to various aspects of the Town’s financial management systems, a chart of accounts, and a Town organizational chart. The Town periodically updates the Accounting Policies and Procedures guide, with the most current version having been revised and adopted by the Town Council in December 2024.

The Accounting Policies and Procedures guide contains a mix of high-level policies (e.g., general financial management principles, basis of accounting, internal control frameworks) as well as low-level processes (e.g., step-by-step check receiving processes, details regarding the preparation of financial reports). While it makes sense for the Town to contain many high-level processes in a document issued by the Town Council, requiring revisions to low-level processes to also go through the Town Council's approval process may prevent the Town from modifying policies at short notice, and represent a level of oversight too detailed for the role of the Town Council.

The Finance Department also maintains a variety of informal, internal references and process guides that provide step-by-step details on how Finance Department staff perform their key functions, with several staff taking recent initiative to create or update existing documentation. While not all Finance processes are captured in either the Accounting Policies and Procedures guide or the Finance Department's internal references and process guides, the existing documents cover most major processes to a reasonable level of detail and the Finance Department is in the process of documenting additional processes and procedures. Per M&J's review, the Finance Department's internal reference guides are generally thorough and up-to-date.

Ethics

As part of the review of the Town's Finance Department and general financial operations, M&J reviewed the Town's ethics policies, including §8.01 (Gifts and Gratuities) and §8.11 (Ethical Conduct and Conflict of Interest) of the Town's employee handbook, Resolution 2024-04 (which establishes the Town's official Gift Policy, referenced in §8.01 of the Town's employee handbook), and §4-406 (Conflicts of Interest) of the *Kiawah Island Code of Ordinances*. The Town's gift policy is robust and well-defined. The Town's ethical conduct and conflict of interest policy is similarly robust and places an affirmative duty on employees to promptly disclose any potential conflicts of interests to their supervisors, who must further report the potential conflict of interest to the Mayor and Town Administrator. If the Mayor and Town Administrator determine that a conflict of interest exists, the Town's ethics policy states that the matter shall be reassigned to a different employee.

ToKI's ethics policies reiterate State ethics laws that prohibit public employees from using their positions for personal gain or to benefit family members or business associates. Section 4-406, *Kiawah Island Code of Ordinances*, prohibits Town employees and officers from having financial interests in organizations that the Town contracts with for land, material, services, or supplies but does not address potential conflicts of interest relating to other organizations that may receive Town support, such as grant recipients. The Town requires employees to periodically review and sign documents confirming that they have reviewed both the Town's gift policy and the Town's employee handbook, which contains its ethical conduct and conflict of interest policy.

Section 3.09 (Whistleblower) of the Town's employee handbook details the Town's extensive policies for receiving whistleblower complaints regarding suspected violations of laws, regulations, or policies, including allowing complaints to be submitted anonymously and allowing complaints to be submitted to individuals outside of their direct organizational reporting chain, including the Town's HR Consultant and members of the Audit Committee. The Town provides guarantees of whistleblower confidentiality (to the degree permitted by law) and non-retaliation and specifically does not prohibit reporting violations to external organizations, such as other government agencies or law enforcement departments.

In interviews, Town staff indicated that several aspects of the Town's ethics policies, including portions of the Town's gift policy requiring the disclosure of certain types of gifts and portions of the Town's whistleblower policy providing designated reporting options outside of organizational reporting chains, are not consistently practiced.

Security

The Town uses a variety of software platforms to perform its various financial processes, including Incode, Wells Fargo's online platform, CitizenServe, and ADP's online platform. Relevant finance-related staff must maintain access to each of these software platforms in order to perform their assigned duties. At the same time, maintaining the security of each of Kiawah Island's software services is critical to preserving the integrity of the Town's financial operations. During M&J's job shadowing sessions and interviews, M&J identified several areas where the Town may be able to improve its security and account management practices.

Various Finance Department staff use Wells Fargo's online platform to perform a number of critical processes, including the Accounting Specialist/Court Clerk, who uses the website to process the weekly check run. The Accounting Specialist/Court Clerk accesses the Wells Fargo online platform using an account originally created for (and still associated with the name of) a previous occupant of their position. The password for the account under the former employee's name has been reset since that employee left the Town. When asked why they were using a prior employee's login, the Accounting Specialist/Court Clerk reported that Town staff encountered difficulties creating a new account at the time of their hiring and that they settled on using the prior employee's login.

The Accounting Specialist/Court Clerk stores their password for the Wells Fargo online platform on a piece of paper in their office. Only a standard login is needed to access the main areas of the Wells Fargo online platform, but an additional security step (entering a code generated by a hardware two factor authentication ["2FA"] key) is required in order to access sensitive functions, such as processing the check run. The Accounting Specialist/Court Clerk stores the hardware 2FA key in their office.

The Town has encountered instances where employees have lost access to accounts for various finance-related services due to inactivity; the Town does not currently require authorized users to periodically log in to assigned accounts in order to verify that the accounts are active and functioning properly.

Key Functions

The Town's Finance Department is involved in eight key functional areas:

- Accounts Payable ("AP")
- Credit Cards
- Accounts Receivable ("AR")
- Purchasing and Procurement
- Payroll
- Treasury Management
- Debt Management
- Grants Administration and Management

The Key Control Matrix, located in Appendix A, summarizes the key internal controls currently implemented by the Town related to each of the Finance Department's functional areas.

Accounts Payable (“AP”)

The AP function involves processing and accounting for payments made by the Town. The primary type of payments processed as part of the Town’s AP function are payments to ToKI vendors for goods and services received, but the AP function also includes the processing of certain other payment types, such as payments to recipients of Kiawah Island grants, payments reimbursing Town employees for authorized expenses incurred on official Kiawah Island business, and payments reimbursing Town residents for solid waste fee overpayments. The Town does not use purchase orders to account for funds that have been obligated but have not yet been spent.

The Town makes payments using physical checks, printed on the Town’s behalf by a vendor. The Town prepares most checks in a weekly check run, although the Finance Department does occasionally process individual payments as single checks as needed. The Accounting Specialist/Court Clerk performs all initial AP processing, typically taking place each Wednesday.

For payments for goods and services, the Accounting Specialist/Court Clerk begins by collecting invoices from a variety of sources. Some invoices are delivered directly to the Accounting Specialist/Court Clerk’s email address, while other invoices are sent to the Town through the mail or are sent to staff within the Town department purchasing the goods or services contained on the invoice (which are both forwarded to the Accounting Specialist/Court Clerk by the staff that receive the invoice). The Accounting Specialist/Court Clerk then confirms that the invoice is ready for payment with management staff in the Town department making the purchase, either through email or by asking the manager to sign and date the invoice. The Accounting Specialist/Court Clerk does not obtain specific approval prior to processing invoices for regular or recurring payments (*e.g.*, utilities payments or recurring payments for contracted services, such as Town Hall custodial service). The Accounting Specialist/Court Clerk then identifies the appropriate General Ledger expense account code for each invoice, discussing the account selection with other Finance Department staff or staff in the relevant Town department as necessary.

For other payments which are not based on invoices, such as payments to grant recipients or employee or resident reimbursements, the employee or elected official requesting the payment must submit a check request, using a standardized ToKI form. The check request form lists the individual making the request, the recipient of the requested payment, the reason for the payment, and the General Ledger expense account code to be used to make the payment. The individual preparing the check request also must obtain the signature of the relevant Town department head or committee chair as well as an additional approver, typically the Town Administrator. The check request must be accompanied with supporting documentation, such as Town Council minutes approving a grant request, receipts confirming employee expenses, or billing records illustrating any overpayment in need of reimbursement.

The Accounting Specialist/Court Clerk then enters the accumulated invoices and check requests into Incode's AP module in Incode as a single batch. All invoices and check requests are processed as direct payments, not as payments on purchase orders. While entering invoices into Incode's AP module, the Accounting Specialist/Court Clerk confirms that the contact information shown in the Incode vendor profile matches the contact information shown on the invoice and may revise the vendor profile with any updates. Recipients of payments processed through the check request process also must have vendor profiles in Incode, even though they often are not traditional "vendors" providing goods or services to the town. If the check recipient does not already have an Incode vendor profile, the Accounting Specialist/Court Clerk creates a new vendor profile, entering the payee's information as available on the invoice or check request. While the Town does attempt to collect W-9 documents from all relevant vendors (*i.e.*, "true" vendors providing the Town with goods and services, not grant recipients or employees/residents receiving reimbursements), neither the Town's policies nor the configuration of the Incode AP module requires the Town to collect W-9s prior to issuing payment to a new vendor. All new vendors are marked as "1099 not required;" the Finance Director and Accounting Specialist/Court Clerk perform a review of payments at the end of each calendar year to identify vendors for whom the Town needs to prepare Internal Revenue Service ("IRS") Form 1099s.

The Accounting Specialist/Court Clerk then prints the payable register for the batch in Incode and presents the payable register and collected invoices/check requests to the Town Administrator for their approval and signature. Once the Town Administrator has reviewed, approved, and signed the payable register and invoices/check requests, they deliver the documents to the Finance Director, who reviews to verify that each payment is being applied to the appropriate General Ledger expense account. The Finance Director then delivers the signed and reviewed documents back to the Accounting Specialist/Court Clerk for further processing.

The Accounting Specialist/Court Clerk then makes any indicated General Ledger expense account updates and begins the process of approving the payment batch in Incode, starting with reviewing to confirm that the payment totals are correct and printing an (unsigned) copy of the checks for the Town's records. The Accounting Specialist/Court Clerk then exports the payment batch from Incode to a plaintext file (.csv) that is formatted for upload to the website of the Town's bank, Wells Fargo. The Accounting Specialist/Court Clerk uses a text editing software to modify the exported file to indicate whether each check should be sent directly to the payee or to Town Hall so that the Town can distribute the check. All employee reimbursement checks are delivered to Town Hall, as are certain checks for vendors or grant recipients, as indicated by management of the relevant Town department.

The Accounting Specialist/Court Clerk then logs into the Wells Fargo website and uploads the check run .csv file into the Wells Fargo batch check upload tool, ensuring that they receive emails from both Wells Fargo and the Town's check printing vendor confirming that the upload was successful. After receiving both confirmation emails, the Accounting Specialist/Court Clerk prints copies of the Wells Fargo check listing (downloaded from the Wells Fargo website) and the check register (exported from Incode) and delivers them to the Finance Director for reconciliation. The Finance Director then approves the check listing on the Wells Fargo online portal, which is the final authorization required for Kiawah Island's check printing vendor to begin printing and distributing the checks included in the check run.

The Town’s check printing vendor either sends checks directly to the payee or, for checks that the Town wishes to distribute itself, to the Town’s office. Check runs are typically processed on Wednesdays, which usually results in printed checks being delivered to Town Hall on Fridays. The Accounting Specialist/Court Clerk delivers employee reimbursement checks directly to employees and other checks to managers of the relevant department. The Town does not maintain logs recording check distribution, either tracking the distribution of checks by the Accounting Specialist/Court Clerk to other Town employees or tracking the distribution of checks by other Town employees to the Town’s vendors or grant recipients.

The Accounting Business License Specialist is cross-trained on the Accounting Specialist/Court Clerk’s AP duties and serves as backup in case the Accounting Specialist/Court Clerk is unable to process a check run.

Credit Cards

The Town issues credit cards to certain employees for use during travel, for purchases that only allow for credit card payments, and for other minor purchases. The Town has a total credit line of \$99,100 with Wells Fargo, its credit card issuer, divided among its seven cardholders as shown in Figure 4.

Figure 4: Credit Cardholder Summary

Cardholder	Credit Limit
Mayor	\$50,000
Mayor Pro Tem	\$36,000
Town Administrator	\$5,000
Town Biologist	\$3,000
Communications Director	\$2,600
Accounting Business License Specialist	\$1,500
Public Works Manager	\$1,000
TOTAL	\$99,100

Cardholders are required to make purchases in accordance with the Town’s purchasing regulations. The Town does not have a cardholder guide or other specific document detailing credit card rules and regulations and does not have a defined disciplinary policy for violations of cardholder requirements, such as using the card for impermissible purchases, failing to retain and provide receipts, or exceeding credit limits.

Cardholders are required to retain receipts for all credit card purchases. The Accounting Business License Specialist receives credit card statements for each of the Town’s credit cards at the end of each monthly billing cycle and provides each cardholder with a copy of their statement, asking each cardholder to provide a receipt for each transaction and indicate the General Ledger expense account to which each expense should be allocated. At this point in the process, the Town Administrator presents their credit card statement and compiled receipts to the Mayor for their review and approval before delivering them to the Accounting Business License Specialist.

The Town does not consistently require cardholders to provide receipts for certain recurring purchases, such as monthly software subscription charges. If a cardholder is not able to provide a receipt for a non-recurring charge, they are asked to reach out to the vendor to obtain a new copy of the receipt, if possible. The Town does not have an established, written policy for how to handle purchases for which the cardholder is unable to obtain and provide a receipt. In interviews, Town staff indicated that there has been discussion about a policy requiring cardholders to reimburse the Town for any payments not supported by receipts, but this policy has not been formally adopted and documented.

The Accounting Business License Specialist submits the credit card statements and compiled supporting receipts to the Town Administrator for their review and approval (other than the Town Administrator's own credit card statements and receipts, which has already been reviewed and approved by the Mayor). Once the statements and supporting receipts have been approved by the Town Administrator (or Mayor), the Accounting Business License Specialist submits the statements and supporting receipts to the Finance Director for their review, including a review to confirm that the designated General Ledger expense account codes are correct for each transaction. The Accounting Business License Specialist then makes an automated clearing house ("ACH") payment by telephone to pay the credit card bill, records the payment in Incode, and prepares journal entries to allocate the expenses to the designated General Ledger expense accounts.

The Town Administrator allows certain Town administrative staff to use their credit card to make purchases on the Town's behalf, as the Town has limited the number of credit cards it holds. The Town Administrator does not require these staff to sign a register acknowledging that they have physical control of the card or record the purchase that they intend to make, only asking that the staff borrowing the card bring a receipt for the purchase back with them when they return the card. There is not currently a ToKI policy prohibiting cardholders from lending their cards to other Town employees or officials, nor providing guidance to cardholders that do lend their cards to other Town employees or officials, or describing the liability that cardholders may assume by lending their cards to other town employees or officials.

Accounts Receivable ("AR")

The Town receives payments from a variety of sources, including directly received revenues (*i.e.*, court fees, STR license fees, business license fees, building and zoning permit fees, solid waste service charges), remitted revenues (*i.e.*, revenues remitted by the State of South Carolina Treasurer or Charleston County), and interest revenues.

Directly Received Revenues

A variety of Town staff manage the billing and collection of revenues collected directly by the Town. This sub-section of the report first describes the methods that the Town uses to process and receive on each different revenue source and then details the processes that the Town uses to collect payments, broken down by payment method.

Directly Received Revenue Sources:

The Town collects directly received revenues from five primary sources:

- Court fees
- STR license fees
- Business license fees
- Building and zoning permit fees
- Solid waste service charges

Court Fees

The Accounting Specialist/Court Clerk administers the tracking and collection of court fees. The Town's court currently only hears cases related to violations of local ordinances, with all enforcement carried out by the Town's code enforcement officers. After issuing tickets for alleged code violations, code enforcement staff provide the tickets to the Accounting Specialist/Court Clerk, who creates a new case in Incode's court module, using the ticket information.

If the ticketed party does not wish to contest the ticket, they can pay the ticket at any time before their scheduled court date. The Accounting Specialist/Court Clerk receives pre-court payments via check (mailed or delivered in-person), credit card (over the phone, swiped in-person, or online), or cash (paid in-person). The Accounting Specialist/Court Clerk does not provide receipts for mailed check payments, but does provide receipts for over the phone credit card payments (via email) and for all in-person payments (using a specific court receipt form). The Accounting Specialist/Court Clerk records the payment against the ticket number in the Incode court module, which will also record the payment in the accounting module of Incode, and updates the case's outcome to show that the case has been resolved. Other Finance Department staff, including the Finance Director, Accounting Business License Specialist, and Finance Assistant, are cross-trained in receiving all three in-person payment methods for court payments and serve to back up the Accounting Specialist/Court Clerk in receiving these payments.

If the ticketed party does wish to contest the ticket, they must attend their assigned court date. The Accounting Specialist/Court Clerk attends all court sessions and administers the outcome of cases, recording the disposition and judgement in the Incode court module. Because the Accounting Specialist/Court Clerk is administering courtroom proceedings on court days, other Finance Department staff that are cross-trained in receiving in-person court payments receive payments from individuals whose tickets are upheld after their cases are heard in court.

STR License Fees

The STR Compliance Clerk administers the billing and collection of STR license fees through the CitizenServe application. When Town property owners submit an application for a new STR license, the STR Compliance Clerk reviews the application for completeness, confirms that the applicant possesses the proper business licenses, and then sends the application through the STR license workflow to have the property reviewed for code compliance by the Town's code enforcement staff. Once the inspection is complete, the STR Compliance Clerk calculates the appropriate charge (based on estimated gross receipts for the property and the Town's rate and fee schedules), and opens the application for payment. The STR Compliance Clerk receives payment for STR licenses (both new applications and renewals) by check (in-person or mailed) and credit card (in-person, by phone, and online). CitizenServe automatically records payments made through the online payment platform, while the STR Compliance Clerk records payments made using other payment methods. Once the full payment has been received, the STR Compliance Clerk issues STR licenses. The Accounting Business License Specialist downloads reports from CitizenServe and then records the payments received in Incode, verifying that all STR payments have been recorded to the Town's General Ledger.

The Accounting Business License Specialist is cross-trained to perform the STR Compliance Clerk's duties to process STR license applications and serves as their backup.

Business License Fees

The Accounting Business License Specialist administers the billing and collection of business license fees through the CitizenServe application, using a similar process to that used by the STR Compliance Clerk to process STR license applications. The Accounting Business License Specialist reviews applications to confirm that the applicant has submitted all required information and meets all relevant qualifications, calculates the appropriate charge (based on estimated gross receipts, business type/class, and the Town's rate and fee schedule), and processes the application for payment. The Accounting Business License Specialist receives payment for business licenses (both new applications and renewals) by check (in-person or mailed) and credit card (in-person, by phone, and online). CitizenServe automatically records payments made through the online payment platform, while the Accounting Business License Specialist records payments on CitizenServe made using other payment methods. Once the full payment has been received, the Accounting Business License Specialist issues business licenses. The Accounting Business License Specialist downloads reports from CitizenServe and uploads them into Incode to receive payments and record them to the Town's General Ledger.

The Accounting Specialist/Court Clerk is cross-trained to perform the Accounting Business License Specialist's duties regarding processing business license applications and serves as their backup for those duties. Additionally, the STR Compliance Clerk is cross-trained to perform a portion of the Accounting Business License Specialist's duties regarding processing business license applications and serves as their backup for that portion of their duties. The STR Compliance Clerk is due to receive additional training on the remainder of the Accounting Business License Specialist's duties related to business license application processing so that they are able to back up those duties.

Building and Zoning Permit Fees

The Permit Technician administers the billing and collection of building and zoning permit fees through the CitizenServe application, using a similar process to that used by the STR Compliance Clerk to process STR license applications and by the Accounting Business License Specialist to process business license applications. The Permit Technician reviews applications to confirm that the applicant has submitted all required information and meets all relevant qualifications, calculates the appropriate charge (based off of the information included in the plan and the Town's rate and fee schedule), and processes the application for payment. The Permit Technician receives payment for building and zoning permit applications by check (in-person or mailed), cash (in-person only), or credit card (in-person, by phone, and online). CitizenServe automatically records payments made through the online payment platform, while the Permit Technician records payments on CitizenServe for applications made using other payment methods. The Accounting Business License Specialist downloads reports from CitizenServe and records the payments received in Incode to verify that all building and zoning permit fee payments have been recorded to the Town's general ledger.

For applications where no technical plan review is required (such as applications for zoning permits or for certain sub-contractor building permits), the Permit Technician issues permits once payment has been received. For applications where technical plan review is required (such as applications for general building permits), the Permit Technician sends the application to the Town's plan reviewers once payment has been received and issues the permits once the plan reviewers have approved the submitted plans.

The Accounting Specialist/Court Clerk and the Building Official (in the Town's Development Services Department) are both cross-trained to perform the Permit Technician's duties related to processing building and zoning permit applications and serve as their backup for that portion of their duties.

Solid Waste Service Charges

The Accounting Specialist/Court Clerk manages the billing of solid waste service charges using Incode's utility billing module. For new service applications, the Accounting Specialist/Court Clerk receives service applications, creates a new service account, and calculates the appropriate pro-rated bill based off of the annual rate for the selected service and the time left in the billing year (July through June, the same as the Town's fiscal year). For annual renewals, the Accounting Specialist/Court Clerk applies the appropriate annual rate for the selected service. The Accounting Specialist/Court Clerk receives payments for solid waste service charges in cash (in-person only), check (in-person or by mail, through the Town's lockbox service), and by credit card (in-person, by phone, or online). The Accounting Specialist/Court Clerk records the payments to each service account in Incode's utility billing module, which automatically applies the charge to the appropriate General Ledger account.

The Finance Director, Accounting Business License Specialist, and Finance Assistant are cross-trained to perform the Accounting Specialist/Court Clerk's duties related to processing solid waste service charges and serve as their backup in these duties.

Direct Receiving Payment Methods

The Town accepts payment for directly received revenues using three primary payment methods:

- Cash payments
- Check payments
- Credit card payments

Cash Payments

The Accounting Specialist/Court Clerk and Permit Technician each are authorized to receive cash payments and maintain a cash drawer containing a fund for making change. The Town's Accounting Policies and Procedures state that each of the two change funds are to contain \$170, but the Town's current practice is for the Accounting Specialist/Court Clerk's drawer to contain \$169.32 and for the Permit Technician's fund to contain \$169.00. On the rare occasions that individuals make in-person cash payments, the staff receive the funds from the individual (using the cash drawer to make change as necessary), place the funds in a deposit bag, prepare a deposit slip and attach it to the secured deposit bag, and provide the deposit bag to the Accounting Business License Specialist. The staff that receives the payment from the payer records the payment against the applicable account in the software used to manage the revenue type (*e.g.*, CitizenServe, Incode's court module, Incode's utility billing module) and prepare a written receipt using a designated form, retaining a carbon copy of the receipt for the Town's records. The Accounting Business License Specialist delivers the deposit bag to Wells Fargo, deposits the enclosed funds, and creates a journal entry to record the deposit to the appropriate General Ledger revenue account in Incode.

The cash drawers are stored in locking boxes, kept in or around the Accounting Specialist/Court Clerk and Permit Technician's desks. The Accounting Business License Specialist conducts monthly counts of each cash drawer to ensure that the funds stored in the drawer always total the designated amount, recording the results of the counts on a tracking form.

Check Payments

When staff receive in-person check payments, staff prepare a receipt for the payer using a dedicated form, retaining a carbon copy of the receipt for the Town's records, and deliver the checks to the Accounting Business License Specialist. The Accounting Business License Specialist deposits received checks in a batch at the end of each day using the Wells Fargo virtual deposit machine. After all checks have been deposited, the Accounting Business License Specialist enters the deposits into a batch in Incode and posts the batch to the general ledger. The Finance Director reviews check deposits as part of their monthly bank account reconciliation.

The Finance Assistant receives the Town's mail and logs any checks received in each day's mail delivery in the Town's mail log, stamping them with "For Deposit Only." After processing each day's mail delivery, the Finance Assistant delivers all received checks to the Accounting Business License Specialist, who signs for receipt of the checks in the Town's mail log and processes the check deposits in the same manner as in-person checks. The Accounting Business License Specialist then provides each Town employee that processes billing and payments (Accounting Specialist/Court Clerk, STR Compliance Clerk, and Permit Technician) with a copy of the deposit slips for the checks, which they then use to identify checks applicable to the types of payments that they process and apply the payments to the applicable account in the software used to manage the revenue type (e.g., CitizenServe, Incode's court module, Incode's utility billing module).

For solid waste services, Kiawah Island directs individuals and businesses making check payments by mail to send checks (noting the relevant account number in the check's memo line) directly to a "lockbox" monitored by a check processing service contracted by the Town. The check processing service receives the checks, reviews each check's memo line and/or accompanying documentation to identify account to which the deposit is being made, and deposits checks to the Town's bank account. The Accounting Business License Specialist downloads a report from the Wells Fargo website daily showing payments received through the lockbox, which they upload into the Incode AR module to automatically apply the payments to the customer accounts. If the check processing service cannot identify the account to which a check is to be applied, they do not apply any further processing and forward the check to the Town for processing with the rest of the Town's mailed checks.

In the event of a deposited check being returned for non-sufficient funds ("bouncing"), the Accounting Policies and Procedures guide states that the Accounting Business License Specialist will attempt to redeposit the check. If the check bounces again, the Accounting Business License Specialist notifies the staff that originally collected the payment, who is responsible for obtaining payment from the payee through other means. The Town does not have policies or procedures related to how staff are to go about attempting to obtain payment on a bounced check or regarding whether the Town can impose fees on individuals or businesses that write checks to the Town that later bounce in order to recoup any costs that the Town may incur related to a check bouncing.

Credit Card Payments

Town staff use Clover credit card reader machines for receiving credit card payments. Finance Department staff share two Clover card readers, with one machine kept in the Accounting Business License Specialist's office and the other shared by the remaining Finance Department staff, while the Permit Technician has a dedicated Clover card reader. When individuals come into the Town office to make payments by credit card, the staff process a payment for the appropriate amount as an in-person payment in the Clover reader and ask the individual to swipe, insert, or tap their credit card. The Clover machine gives payers the option to receive printed and/or emailed receipts.

The Town maintains two different systems for processing online payments. For payments for court fees and solid waste service charges, the Town has a dedicated online portal that payers can use to make online payments. Payers can identify their charges by entering their citation number (for court fees) and account number (for solid waste service charges) The Accounting Specialist/Court Clerk receives an email notification when payments are received and then downloads a payment file from the portal and uploads the payment into Incode to record the payment to the Town's General Ledger.

For payments of business license fees, STR license fees, and planning and zoning permit fees, ToKI collects online payments through CitizenServe, the platform that the Town uses to manage these licensing and permitting applications. CitizenServe automatically notifies the relevant Kiawah Island staff when payments are made. The Accounting Business License Specialist exports the payments from CitizenServe and uploads them into Incode on a regular basis to record them to the Town's General Ledger.

When in-office, Town staff use the Clover credit card readers to process credit card payments by phone. When staff are on their designated work-from-home days (or when staff are out of office for other reasons, such as when the recent water damage incident at the Town Hall prevented staff from working in the office), Town staff use the online portals to process credit card payments. For all phone payments, the Town staff initiate a payment for the appropriate amount and key in the credit card information provided by the payer over the phone. The Clover machine and online portals both give payers the option to receive emailed receipts. The Town's credit card processing vendors charge fees to the Town to process the Town's credit card payments, with the fees charged varying by payment method (*i.e.*, in-person payments processed on Clover readers, phone payments processed on the Clover readers, payments processed through the online portals). The Town does not currently pass credit card fees on to the payers.

As of M&J's fieldwork, the Town is working with its credit card processing vendor to implement a new credit card processing system that, among other new functionality, will provide greater capability to process credit card payments remotely and allow the Town to more fully capture credit card processing costs.

Remitted Revenues

The Town receives tax revenues (including State and County accommodations tax revenues and local option sales tax revenues) remitted by the State of South Carolina Treasurer and Charleston County. The State of South Carolina Treasurer remits tax revenues using ACH transfers directly to the Town's bank account. ACH transfers from the State of South Carolina Treasurer are accompanied by a memo noting the contents of the payment. The Accounting Business License Specialist records ACH payments received in Incode as journal entries, ensuring that they are assigned to the appropriate General Ledger revenue accounts. The Finance Director reviews the journal entries prepared by the Accounting Business License Specialist to record ACH payments prior to posting.

Charleston County remits tax revenues using checks. The Accounting Business License Specialist deposits Charleston County tax remittance checks using the Town's standard check depositing process and records the payments in Incode to ensure that they are assigned to the appropriate General Ledger revenue accounts.

Interest Income

The Town receives monthly statements for its Wells Fargo bank account and its account in the South Carolina Local Government Investment Pool ("LGIP"), which show the interest earned by each account. The Finance Director prepares and posts journal entries allocating the interest revenues from each account to the proper General Ledger revenue accounts.

Purchasing and Procurement

The Town divides purchases into two primary categories, based on estimated purchase value. Purchases with an estimated value of \$20,000 or less are classified as “small purchases,” while purchases with an estimated value greater than \$20,000 are classified as “formal purchases.” Specified types of purchases are exempt from certain purchasing requirements, and the Mayor may also authorize the use of certain non-competitive purchasing methods. The Town requires purchases of \$20,000 or more to be approved by the Town’s Ways & Means Committee, and purchases of \$100,000 or more to additionally be approved by the Town Council.

Small Purchases

Small purchases are divided into two sub-categories based on value. Purchases of no more than \$5,000 must be approved by either the Town Administrator or the Finance Director prior to purchase. The Town does not issue purchase orders following purchase approval or use another system to track purchase approvals. Departments requesting purchases do not need to provide any specific supporting documentation for these purchases.

Purchases of at least \$5,000 but no more than \$20,000, departments requesting purchases are required to obtain at least three written quotations. Purchases are awarded to the lowest quote, although the Mayor may authorize award of purchases to quotes other than the lowest quote by providing a written determination that purchasing from the alternate vendor would be in the Town’s best interest. Approval requirements for these purchases vary based on purchase size. Purchases of at least \$5,000 but no more than \$10,000 must be approved by both the Town Administrator and the Finance Director, while purchases of at least \$10,000 but no more than \$20,000 must be approved by the Mayor and any one member of the Town Council.

Formal Purchases

The Town’s procurement code authorizes four competitive procurement methods for formal purchases. All formal purchases begin with issuing a solicitation that details the bidding method selected and the specifications of the goods or services being procured. The Town then provides adequate public notice of the bid opportunity. Figure 5 details the four authorized competitive procurement methods, including whether the Town can restrict bidding to pre-qualified vendors and information on what type of response the Town asks of bidders, how the selection committee evaluates responses, what rules are used to determine the purchase award, and how the resulting contract is reached.

Figure 5: Formal Solicitation Method Comparison

	Invitation for Bid (“IFB”)	Request for Proposals (“RFP”)	Qualifications Based Selection (“RFQ”)	Reverse Auction
Pre-qualification Allowed?	No	No	No	Yes (Mayor makes qualification determinations)
Response	Qualifications, price bid	Proposal, price bid	Qualifications	Price bid
Evaluation Method	Selection committee reviews qualifications to identify responsive and responsible bidders	Selection committee reviews proposals and price bids using criteria specified in solicitation, which may include price, to determine the most qualified proposer, selection committee may hold interviews if desired	Selection committee reviews qualifications to identify qualified bidders, holds interviews with qualified bidders, and ranks interviewed bidders based on qualifications	Mayor reviews bidders to identify responsive and responsible bidders
Award Method	Awarded to lowest priced bidder	Awarded to the most qualified proposer	Awarded to the most qualified bidder	Awarded to lowest priced bidder
Contracting Process	Contract based on provided scope and price bid, no negotiations	Selection committee negotiates contract with most qualified proposer; if acceptable contract cannot be reached, negotiates with next most qualified proposer	Mayor negotiates contract with most qualified bidder (as determined by the selection committee); if acceptable contract cannot be reached, negotiates with next most qualified bidder	Contract based on provided scope and price bid, no negotiations

The Town does not have any procedure or provide any official guidance around determining which formal procurement method should be used in any given situation, leaving the decision to the judgement of Town leadership (including the Mayor, Town Administrator, and Finance Director).

The Town’s procurement code specifies the approval required to finalize formal purchases once the selection committee or Mayor has determined the award. Per the procurement code, formal purchases of at least \$20,000 are approved by the Town’s Ways & Means Committee, while purchases of at least \$100,000 are also approved by the Town Council.

Non-competitive Purchases

The Mayor may authorize the use of non-competitive procurement for one of two reasons. In emergency situations, the Mayor may authorize non-competitive procurement for emergency purchases. Emergency purchases of no more than \$150,000 may be made at the Mayor's sole discretion, while emergency purchases of greater than \$150,000 additionally require the approval of a quorum of the Town Council. Emergency purchases are exempt from the Town's standard approval requirements (*i.e.*, Ways & Means Committee approval for purchases of \$20,000 or more and Town Council approval for purchases of \$100,000 or more). The Mayor may also authorize sole-source procurement for purchases where there is only one available source for the good or service, as determined by the Mayor in writing.

Exempt Purchases

The Town Council may exempt individual purchases from the Town's standard competitive procurement requirements if they determine that the exemption is in the Town's best interest. Additionally, certain purchases are specifically exempted from the Town's competitive procurement requirement:

- Certain specified professional services
- Real property
- Purchases made through purchasing cooperatives
- Purchases made off of existing contracts or approved vendor lists of other public procurement units, provided that such contracts or vendor lists were developed pursuant to appropriately competitive procedures

Exempt purchases must go through the Town's standard approval process, which requires approval of the Ways & Means Committee for all purchases of at least \$20,000 and additional approval of the Town Council for all purchases of at least \$100,000.

Payroll

The Town utilizes a third-party vendor, ADP, to process payroll. Access to the administrative side of the Town's payroll system is limited to the Finance Director and Accounting Business License Specialist for processing, and the Mayor and Town Administrator for reporting. The Town processes payroll for Fair Labor Standards Act ("FLSA") exempt employees monthly, with payday falling on the first of the month. The Town processes payroll for FLSA non-exempt staff bi-weekly, with pay periods ending every other Friday.

The Town uses timesheets to capture employee time through an ADP-integrated timeclock system. Management in each Town department is responsible for managing employee time off requests and approving timesheets for staff within their department. When beginning payroll processing, the Accounting Business License Specialist prepares a report showing time entries for employees in each department during the prior pay period and asks department managers to verify and approve the entries. The Accounting Business License Specialist runs a preliminary report that identifies any missing timeclock punches and any overtime, and works with the employees and, as applicable, their departmental leadership to resolve any exceptions or discrepancies.

After they are signed off by department management, the Accounting Business License Specialist runs the preview payroll register, verifying that all hourly employees have the correct number of hours, and that overtime has the appropriate approvals and detail as required. Once all corrections have been made, the Accounting Business License Specialist forwards the timesheets to the Finance Director for their review and approval. Once approved, the Accounting Business License Specialist notifies ADP that the payroll register can be finalized. Once finalized, the Accounting Business License Specialist downloads and confirms that all details are accurate, including benefit deductions, that any retirement benefits eligible for match by the Town are matched up the allowable amount, and reported hours for hourly employees. Once all of these details have been verified complete and accurate, the Accounting Business License Specialist then submits the payroll register to the Finance Director for review and approval. Once The Finance Director approves the payroll register, the Accounting Business License Specialist finalizes the payroll submission in the ADP software.

The Town requires all employees to utilize direct deposit. ADP processes the direct deposit payments to employees. The Accounting Business License Specialist exports payroll records from ADP software and uploads them into Incode, which creates the related journal entries. The Finance Director verifies the uploaded journal entry register's completeness and accuracy for posting.

Compensation Adjustments

The Town typically reviews and adjusts employee compensation annually, usually around the same time as the fiscal year change. The Town prepares a letter for each impacted employee, which is dated and then signed and dated by the Mayor and the Town Administrator. The letter contains the employee's new pay rate, the effective date, and in which pay statement the pay rate will be reflected. Employees also sign and date to acknowledge receipt of the information.

The original letter is maintained in a physical personnel file, with a copy provided to the impacted employee.

The Accounting Business License Specialist and the Finance Director are responsible for entering the compensation adjustments into ADP, and calculating and processing any back pay associated with the new rate.

Treasury Management

The Town holds funds in a Wells Fargo checking account and in an investment account in the LGIP, administered by the State of South Carolina Treasurer. The Town maintains an investment policy that details allowed investments as well as the considerations that the Finance Director should make in making investment decisions. In practice, the Finance Director works with the chair of the Ways & Means Committee and the Mayor to make investment decisions, while the Finance Director performs transfers between the Town's Wells Fargo and LGIP accounts. The Finance Director prepares and presents to the Town Council an annual report showing the status of the fund balance and investment performance. The Finance Director also prepares quarterly reports for the Ways & Means Committee and the Town Administrator detailing the Town's investment holdings, performance over the prior quarter, and overall risk profile.

The Finance Director performs a monthly reconciliation of the Town's Wells Fargo checking account, verifying that the deposits and withdrawals from/to the account agree with the entries in Incode. The Finance Director submits the bank reconciliation to the Town Administrator for their review and approval.

Debt Management

The Town has not had any outstanding long-term debt since at least the start of this Assessment review period (FY23). The Town does not currently have established policies related to issuing and servicing long-term debt other than a general statement in the Town's Accounting Policies and Procedures manual that states that "the function of the debt service repayment is the responsibility of the [Finance Director] who should monitor cash flows to ensure funds are available for payment of outstanding debt." The Town's Accounting Policies and Procedures manual, developed by the Finance Director, provides limited guidance regarding debt issuance, payment, and management.

Grants Administration and Management

The Town administers two main types of grants:

- Charitable Grants
- State Accommodations Tax ("SATAX") Grants

Charitable Grants

The Town offers charitable grants to 501(c)(3) non-profit and/ tax-exempt organizations serving the Johns Island and Wadmalaw Island communities, with particular focuses on addressing issues of hunger, housing, and health. The Town typically budgets \$200,000 per year for charitable grant distributions, although the budgeted amount increased to \$220,000 for FY26. The Town requires applications to be submitted by January 1 of each year, with the Town Council determining awards in April or May. The application packet requests grantees to provide a detailed description of how the funds are to be used and the benefit that the funds will provide. Kiawah Island's charitable grant application packet does not require the applicant to disclose relationships, including volunteer or board member relationships with Town employees or officials (including Town Council members) and does not require applicants to sign a non-collusion pledge.

Kiawah Island disburses charitable grants as lump-sum payments, not based on reimbursement of actual expenses. Many grant recipients have received awards for multiple years, and existing charitable grant recipients are required to provide documentation showing that they have used previously awarded funds for the specified purposes (or, if funds were not fully expended on the intended uses, explaining why funds were not used as intended) in subsequent grant applications. The Town does not require applicants to provide any evidence of fund usage other than grant reapplications, however, and therefore is not able to evaluate the performance of non-repeating grantees.

SATAX Grants

In accordance with relevant State law, the Town uses a portion of its SATAX funding to award grants to organizations for putting on projects and activities that promote tourism within the Kiawah area. The Town's website identifies the following as the types of projects and activities eligible for funding through Kiawah Island SATAX grants:

- Promotion of arts and cultural events
- Construction, operation, and maintenance of cultural facilities
- Tourism-related public services and facilities
- Beach renourishment and waterfront erosion control
- Activities that attract and serve visitors to Kiawah Island

The Town accepts SATAX grant applications from for-profit and non-profit organizations and disburses awards as reimbursements for actual eligible expenses. Kiawah Island SATAX grant awards are determined by the Town's SATAX Committee. ToKI does not require applicants for SATAX grants to disclose relationships with Town employees or officials (including members of the SATAX Committee) and does not require applicants to sign a non-collusion pledge. The Town requires applicants to submit an application describing the proposed tourism-promoting project or activity, specifying the anticipated tourist impact of the project or activity, and detailing the project or activity's budget. For repeat applicants, the Town requires applicants to complete and attach to the application an additional form reporting on how funds were used in the prior year and what the project's impacts were. Due to the fact that funds are disbursed for reimbursements for actual eligible expenses, the Town receives significant information on fund usage throughout the fiscal year for all grantees, not only on reapplications.

As currently designed, the Town's SATAX grant application form appears to be primarily designed for applicants intending to host festivals, concerts, or other short-term events, with fields asking about anticipated attendance, specific project dates, and questions regarding use of specific resources (*e.g.*, Sheriff's deputies). As a result, applicants for non-event programming, such as ongoing marketing campaigns or conservation efforts, are not able to adequately respond to all fields on the form. Additionally, certain other performance measures (*e.g.*, total overnight visitors drawn by the project or activity) are much more difficult to assess for more broad-based marketing and conservation efforts, as opposed to festivals or other time-limited events.

Risk Assessment

M&J conducted a high-level inherent risk assessment of the Finance Department's key processes in order to guide sample identification and testing. M&J's assessment evaluated the *inherent risk* (*i.e.*, the risk faced without considering any controls that the Town may have implemented) of fraud, waste, and abuse of the Finance Department's key processes across three aspects:

- **Inherent Risk Likelihood:** The likelihood of the process resulting in fraud, waste, or abuse, regardless of the severity of the incident
- **Inherent Risk Impact:** The likely severity of a fraud, waste, or abuse incident related to the process, regardless of how likely the incident is to occur
- **Fraud Risk:** The likelihood that the Town will be the target of attempted fraud related to the process

For each process, M&J assigned a score of “High,” “Medium,” or “Low” for each risk aspect. M&J’s risk scores are subjective evaluations based on M&J’s professional experience and a variety of quantitative and qualitative features of each process. Features evaluated by M&J related to Inherent Risk Likelihood include the number of transactions that the Town processed related to each process, the risks posed by various process details (e.g., mode of payment), and overall industry trends and risk profiles. Features evaluated by M&J related to Inherent Risk Impact include the value of the transactions that the Town processed related to each process (including total value, average per-transaction value, and maximum per-transaction value) and overall industry trends and risk profiles. Features evaluated by M&J related to Fraud Risk include the Town’s history, the risks posed by various process details, and overall industry trends and risk profiles.

M&J used the risk assignments for each of the three risk aspects to determine each process’s overall Inherent Risk Score. The Risk Assessment Detail (located in Appendix B) provides additional detail regarding M&J’s determination of the Town’s Inherent Risk Scores. Figure 6 shows the Inherent Risk Score assigned to each of the assessed processes. The risk ratings provided by M&J are not intended to replace the risk assessments of Town management and the Audit Committee. The Town should not substitute these ratings for its own judgement.

Figure 6: Risk Assessment Summary

Category	Process	Inherent Risk Score
AP	Invoice Processing	Medium
	Check Processing	High
	Vendor Management	High
Credit Cards	Credit Card Management	High
AR	Payment Receiving	Medium
Purchasing and Procurement	Solicitations	High
	Contract Management	Medium
Payroll and Personnel	Payroll and Personnel Management	Medium
Treasury Management	Cash/Bank Management	Medium
	Investment Management	Low
Debt Management	Debt Service	Low
	Debt Issuance	Low

Sample Testing

M&J identified six areas for detailed sample testing to review the consistency and appropriateness of the Town's existing internal controls as well as general Finance Department performance. M&J selected the areas for sample testing based on both the Inherent Risk Scores as assigned in the risk assessment as well as a preliminary assessment of relevant internal controls; all six sampled areas were assigned Inherent Risk Scores of "Medium" or higher for at least one associated process. The sampled areas are:

- AP
- Vendor Management
- Credit Cards
- AR
- Purchasing and Procurement
- Payroll
- Treasury Management

AP

To test the Town's AP function, M&J used convenience sampling¹ to sample 21 payments made by the Town across FY23, FY24, and FY25 and requested all documents that ToKI had on file related to those payments. The payments include a mix of payments to vendors based on invoices (including payments on contracts and individual purchases), payments to vendors on credit accounts, reimbursements paid to individuals (*e.g.*, solid waste service charge reimbursements), and employee reimbursement payments. Payment values range from \$28.35 to \$48,666.66, with a total value of \$143,358.67. The Town was able to provide supporting documentation for all 21 payments.

M&J reviewed the provided supporting documentation to verify the following:

- That the value on the supporting documentation matches the paid value recorded in Incode
- That the nature of the purchase matches the description recorded in Incode
- That the supporting documentation indicates that required signoffs had been received
- That the charge was assigned in Incode to the approved General Ledger expense account

All 21 payments contained matching value, description, and General Ledger expense account information. 20 of the 21 payments had supporting documentation that also include signatures from authorized signers. The one purchase that did not include a signature from an authorized approver was part of a "special" check run conducted outside of the standard weekly check run process. The payment made without an authorized approver's signature was for \$2,164.20. M&J did not identify this lack of documented approval as being part of a larger trend. The payment was also processed and reviewed by the Accounting Specialist/Court Clerk and the Finance Director, which serves as a compensating control with two levels of review.

¹ Convenience sampling, also known as haphazard sampling or accidental sampling, is not based on a formal, structured process for selecting the sample population, but is left largely to the discretion of the person performing the sampling.

For one purchase (a check request to purchase tickets for an employee appreciation event), the check request/reimbursement form was both prepared and approved by the Town Administrator. The payment for which the Town Administrator served as both preparer and approver was for \$1,500.00. M&J has not identified this separation of duties violation as being part of a larger trend, although it is noted that the Town Administrator has a relationship with the vendor. Additionally, the payment was processed and reviewed by the Accounting Specialist/Court Clerk and the Finance Director, which serves as a compensating control.

Figure 7 summarizes our review of the adequacy of the supporting documentation, by documentation type:

Figure 7: AP Sample Testing Results

Payment Support Type	Total Tested	Complete & Accurate
Vendor invoice	14	13
Travel Reimbursement	2	2
Check Request Form	5	3

M&J reviewed 14 payments made using vendor invoices. The provided invoices were sufficient to justify the payment for 13 of the 14 invoice-based payments. The one invoice-based payment for which sufficient documentation was not provided was instead based on a hand-written invoice that did not list the amount owed by the Town. The payment evidenced by the hand-written invoice was for \$1,000.00. Per interviews, the vendor that provided the hand-written invoice is a long-time Town contractor that works for a flat monthly fee cleaning up around the Town’s dumpster site, although this arrangement is not memorialized in a contract or similar document. M&J reviewed the Town’s general ledger detail and observed that the sampled Town contractor has received monthly payments from the Town since at least FY23, with the standard payment value increasing from \$833.33 per month to \$1,000.00 per month partway through FY24, as indicated by Town staff in interviews. The contractor has periodically received payments slightly greater than the “standard” amount for specific months, with accompanying notes indicating that extra hauling was performed in these months.

M&J reviewed two payments supported by travel reimbursement forms, which require applicants to attach receipts or other supporting documents justifying the reimbursement. Both of the reviewed travel reimbursement requests were accompanied by receipts supporting the entirety of the reimbursement requests.

M&J reviewed five payments supported by check request/reimbursement forms, which require applicants to attach receipts or other supporting documents justifying the payment. Sufficient supporting documentation was provided for three of the five reviewed check request/reimbursement forms, while no accompanying documentation was provided for the other two check request/reimbursement forms. The two check request/reimbursement forms not accompanied by supporting documentation include the aforementioned check request to purchase tickets for an employee appreciation event (\$1,500) as well as a reimbursement request for a Town official’s monthly cell phone reimbursement. Per interviews, the Town does not require staff and officials to submit receipts or other documentation to support monthly cell phone reimbursements and the cell phone reimbursement payment (\$100.00) is in line with typical cell phone reimbursement amounts as described by Town staff.

AP Sample Testing Summary: The Town’s internal controls related to AP are generally adequate and well-implemented, although M&J did notice some minor areas of non-adherence to documented procedure. M&J identified one separation of duties violation, although this does not appear to be part of a larger pattern and was adequately addressed by other compensating controls. Similarly, the one instance of documentation not showing a signature from an authorized signer was not part of a larger pattern of control violations and was addressed by other compensating controls. M&J additionally noted three instances where the Town did not collect and retain all supporting documentation required by the Town’s written policies and procedures, although two of these instances were due to the Town’s written policies and procedures differing from longstanding practice. None of the four payments identified by M&J as not being in full compliance with the Town’s established AP policies and procedures have a material impact on the Town’s financial state, either independently or collectively.

Vendor Management

To test the Town’s vendor management function, M&J sampled 15 entities that received payments from the Town across FY23, FY24, and FY25. M&J sampled payees using convenience sampling,² selecting a mix of payees that appear to be currently active (*i.e.*, payees that received payments during FY25) and payees that appear to be inactive (*i.e.*, payees that were active in FY23 but did not receive payments during FY25). The payees sampled by M&J include vendors that provide the Town with goods or services and Town grant recipients; M&J did not sample employees or residents that received Town reimbursement checks. M&J requested that the Town provide all records that the Town held in the relevant file for the sampled payees. The Town informed M&J that it does not maintain files for grant recipients and instead provided the Town with grant applications for grant recipients, which contained similar supporting documentation for the grantees. The Town provided M&J with at least some documentation related to 12 of the 15 sampled payees, including nine vendors, two SATAX grant recipients, and one charitable grant recipient, but did not provide M&J with any documentation related to the remaining three sampled payees.

For the vendors, M&J reviewed to confirm that the Town held a W-9 for each vendor and reviewed the W-9s date to determine if the W-9 is current. For SATAX grant recipients, M&J reviewed the most recent SATAX application packet to determine that the awards were made appropriately. For charitable grant recipients, M&J reviewed the most recent charitable grant application to confirm that the awards were made appropriately and confirm that the Town retained a copy of documentation supporting the organization’s non-profit and/or charitable status. Figure 8 details the results of M&J’s evaluation of the Town’s payees.

Figure 8: Vendor Management Sample Testing Results

Payee Type	Total Tested	Complete & Accurate	Paperwork Current
Vendor	12	6	1
SATAX Grant Recipient	2	2	2
Charitable Grant Recipient	1	1	1

² Convenience sampling, also known as haphazard sampling or accidental sampling, is not based on a formal, structured process for selecting the sample population, but is left largely to the discretion of the person performing the sampling.

M&J received documentation for nine of the twelve sampled vendors, but the provided documentation only included W-9s for six vendors. Of the six W-9s provided for review, only one W-9 was dated within the past two calendar years (measured from the date of the Town's most recent payment to the vendor), with four W-9s being two or more years old and the remaining one W-9 being undated.

Both SATAX grant awards appear to have been made appropriately and included the required prior year SATAX performance reports for the one applicant which received SATAX funding in the prior fiscal year.

The Town's one charitable grant award appears to have been made appropriately and included all required documentation.

Vendor Management Sample Testing Summary: The Town's internal controls related to vendor management are effective as they relate to the Town's SATAX and charitable grant recipients but could be improved significantly as they relate to vendors. The Town does not currently have policies or processes in place that require staff to verify that the Town maintains recent W-9s for vendors before issuing payment to those vendors. While the IRS does not generally require organizations to periodically update W-9s on file, doing so is generally considered to be leading practice as it helps keep the Town's vendor information updated and accurate, and helps ensure that, if applicable, the Town is tracking and reporting on information reporting to the IRS.

Credit Cards

To test the Town's credit card administration and processing function, M&J used convenience sampling³ to sample nine individual monthly credit card statements from FY23, FY24, and FY25, containing a total of 90 charges. Total charges on each of the the sampled statements range from \$71.40 to \$4,200.00, with an overall total value of \$15,711.03, while the total number of charges during the sampled month ranged from one to 30. For each credit card sample, M&J asked the Town to provide the statement issued by the Town's credit card provider, the relevant credit card journal entry register, and all supporting documents (*e.g.*, receipts).

M&J reviewed the provided documents for each charge to verify the following:

- That each charge has the required supporting documentation
- That the details of each charge match the information on the associated supporting documentation
- That the credit card reconciliation has the proper approvals and signatures
- That the reconciling journal entry is for the correct value and is applied to the correct General Ledger expense account.

At least some amount of documentation was provided for all nine sampled statements. Figure 9 details additional results of M&J's credit card sample testing.

³ Convenience sampling, also known as haphazard sampling or accidental sampling, is not based on a formal, structured process for selecting the sample population, but is left largely to the discretion of the person performing the sampling.

Figure 9: Credit Card Sample Testing Results

Total number of charges	90
All required supporting documentation present⁴	80
Charge details match provided supporting documentation (as applicable)	84
Reconciliation approved and signed	90
Reconciling journal entry proper	90

The documents provided to M&J contained documentation verifying that all 90 charges received the proper approvals and signatures and documenting that the reconciling journal entries were proper.

M&J received all required supporting documentation for 80 of the 90 charges included in the nine sampled monthly credit card statements, including 68 charges for which M&J received documentation and 12 charges which M&J deemed to be recurring and therefore determined that no supporting documents were required. The 10 charges for which M&J did not receive all required supporting documentation include six non-recurring charges (totaling \$979.40) for which M&J were not provided any supporting documentation and four non-recurring charges (totaling \$408.26) for which the provided supporting documentation was not adequate (*i.e.*, the provided supporting documents were unitemized receipts, billing statements, or other summary documents that do not provide an itemized list of goods/services purchased). M&J verified that the charge details matched the provided supporting documentation (as applicable) for 84 charges, including the 68 non-recurring charges for which M&J received all required supporting documentation, the four non-recurring charges for which M&J only received partial supporting documentation, and the 12 recurring charges for which supporting documents were not provided. M&J did not identify any charges where the charge details disagreed with the supporting documentation, but was unable to evaluate the agreement between charge details and supporting documentation of the six non-recurring charges for which no supporting documentation was provided.

During its review, M&J additionally identified two instances where a cardholder exceeded their card's approval limit. In the identified instances, cardholders exceeded their credit limits by \$224.69 and \$52.16. In both cases, Finance Department staff applied a mid-cycle payment on the same or following day to bring the card's balance below the approval limit and allow for continued card use. For one of these statements, the cardholder required two mid-cycle payments within the same cycle to reduce the card's balance and allow for continued card use. The statement which required two mid-cycle payments in order to support continued card use was for the card held by the Accounting Business License Specialist, who uses their card for purchases supporting a number of other Town staff, including other Finance Department staff and staff in other Town departments that do not have their own cardholders. The charges made by the Accounting Business License Specialist include a mix of recurring charges (primarily for software subscriptions, many for other users) and one-time charges (including trainings for other staff and purchases for other departments that do not have their own cardholders).

⁴ The Town does not require that cardholders provide supporting documents for recurring charges (other than the initial charge).

M&J identified that the Town Administrator allows certain Town staff to borrow the Town Administrator's credit card to make purchases for Kiawah Island business without requiring those staff to sign a register or otherwise follow some procedure to track and/or manage the borrower's usage of the card. M&J's sample of credit card statements includes two Town Administrator statements, although the lack of documentation prevents M&J from determining whether any of the purchases on the sampled Town Administrator statements were made by Town staff other than the cardholder. The sampled Town Administrator credit card statements include total charges of \$1,330.83 and \$2,159.21, which do not materially impact the Town's financial position.

Credit Card Sample Testing Summary: The Town's internal controls related to credit card processing and management are largely effective in practice and M&J did not identify any instances of fraud, waste or abuse related to credit card transactions. The Town's lack of a written, centralized set of policies and procedures related to credit card usage means that the credit card procedures executed by Town staff may vary over time and allow for more flexibility in implementation than intended. M&J identified several instances where cardholders did not provide required supporting documentation (or provided insufficient supporting documentation) for charges, but these omissions do not appear to be part of a larger ongoing trend and do not materially impact the Town's financial position.

AR

To test the Town's AR function, M&J used convenience sampling⁵ to sample 15 individual payments received by the Town across FY23, FY24, and FY25. The sampled payments, which range in value from \$62.11 to \$505,182.08, include a mix of court fee payments, building and zoning permit fee payments, solid waste service charges, business license fee payments, STR license fee payments, interest revenues, and tax remittances. The sampled payments total \$909,617.78, with an average (mean) value of \$60,641.19 and median value of \$7,015.95. Payment methods included check, credit card, ACH, and interest recognition. To evaluate the sampled payments, M&J asked the Town to provide all relevant supporting documents available. M&J received supporting documentation for all 15 sampled payments.

M&J reviewed the provided documents to verify the following:

- That the supporting documents are sufficient to evidence the deposit
- That the deposit value recorded in Incode matches the value on the supporting documentation
- That deposit documents contain all required signatures and approvals.

The documents received and reviewed by M&J include documents showing evidence of the deposit, confirming that the deposit was recorded properly in Incode, and showing all required signatures and approvals for all 15 samples.

AR Sample Testing Summary: M&J's evaluation of AR samples showed that the Town's existing controls are effective and implemented consistently.

⁵ Convenience sampling, also known as haphazard sampling or accidental sampling, is not based on a formal, structured process for selecting the sample population, but is left largely to the discretion of the person performing the sampling.

Purchasing and Procurement

To test the Town’s purchasing and procurement function, M&J used convenience sampling⁶ to sample 10 purchases evaluated by the Town’s Ways and Means committee in FY23, FY24, and FY25. Figure 10 details the fiscal year and finalized value of the sampled purchases.

Figure 10: Sampled Purchase Summary

Fiscal Year	Purchase	Value
FY23	Comprehensive Plan Update	\$140,000.00
FY23	Code Enforcement Services	\$389,376.00
FY23	Landscape Architecture Services	\$29,500.00
FY23	Kiawah Island Parkway Traffic Counts	\$27,300.00
FY24	Beachwalker Drive Survey	\$18,700.00
FY24	Emergency Call Boxes	N/A ⁷
FY24	Recycling and Solid Waste Educational Cart Stickers	\$7,619.10
FY25	Traffic Monitoring Equipment	\$37,422.43
FY25	On-call Engineering Services	N/A ⁸
FY25	Town Vehicle	\$52,000.00

To evaluate the sampled purchases, M&J asked the Town to provide all procurement records associated with the sampled purchases, including vendor-submitted documents (e.g., bids and proposals) as well as documents prepared by the Town (e.g., solicitations, specifications, evaluation worksheets, contracts). The Town provided M&J with documentation for nine of the 10 sampled purchases. M&J additionally obtained additional Town Ways & Means Committee and Town Council documents as needed from the Town’s website.

M&J reviewed the provided documents to verify the following:

- That that all relevant documents were retained, including solicitation documents, vendor responses, evaluation worksheets, and other relevant documents
- That the award was made properly
- That the purchase was approved properly.

In reviewing for complete document retention, M&J was able to identify the original solicitation and/or specification documents for only four of the nine purchases for which documents were available. M&J reviewed the four solicitation and/or specification documents and confirmed that they provide sufficient detail about the goods/services being sought and adequately describe the Town’s purchasing process.

⁶ Convenience sampling, also known as haphazard sampling or accidental sampling, is not based on a formal, structured process for selecting the sample population, but is left largely to the discretion of the person performing the sampling.

⁷ The Town Council declined to finalize the recommended award for the Emergency Call Box procurement, so a final value is not available.

⁸ Awards for the On-call Engineering Services procurement are on-call contracts, not a single project, so a final value is not available.

M&J was able to identify vendor responses (*e.g.*, bids, quotes, proposals) for eight of the nine documents for which documents were available. M&J reviewed the eight vendor responses received and confirmed that the responses were generally complete and in compliance with response requirements (either actual requirements stated in the received solicitation and/or specification documents or, for purchases for which solicitation and/or specification documents were not present, expected requirements based on professional experience).

M&J did not identify Town-created evaluation documents for any sampled purchases. M&J did identify at least some written justification in meeting documents supporting the purchase for all nine purchases for which M&J was provided documents, but the justifications were of an inconsistent depth and occasionally referred to other evaluation documents which M&J has not been provided. Per Town Council meeting minutes, all nine purchases for which M&J was provided documents were properly approved by the Town Council. In interviews, Town staff indicated that selection committees conducted formal bid/proposal evaluations for at least two of the sampled purchases; for both purchases, staff stated that bid evaluation records were not available because the members of the selection committee did not return the evaluation forms to the Town Clerk for retention.

The Town adopted a new procurement code on April 1, 2025. Eight of the sampled purchases (including all FY23 and FY24 purchases and the FY25 traffic monitoring equipment purchase) were conducted under the Town's old procurement code, while only two of the sampled purchases (the FY25 On-call Engineering Services and Vehicle purchases) were conducted under the Town's current procurement code.

Purchasing and Procurement Sample Testing Summary: While M&J's review of Kiawah Island purchasing and procurement samples does not suggest any instances of fraud, waste, or abuse, the Town's procurement-related controls do not retain sufficient documentation to allow for a complete review of all sampled purchases and confirmation of compliance with local procurement regulations. While the Town's actual procurement practices do not allow for M&J to fully assess the Town's internal controls in practice, the Town's written purchasing and procurement policies are robust and the included internal controls would be generally sufficient if fully implemented.

Payroll

To test the Town's payroll function, M&J used convenience sampling⁹ to sample 12 pay periods across FY23, FY24, and FY25 and reviewed relevant supporting documentation, including payroll registers, timesheet reports, and leave approval documents. M&J sampled two pay periods each year for both the Town's biweekly/hourly payroll cycle and the Town's monthly/salary payroll cycle, including one mid-year pay period as well as the first pay period for which compensation adjustments were applied. The Town was able to provide supporting documentation for all 12 sampled pay periods.

⁹ Convenience sampling, also known as haphazard sampling or accidental sampling, is not based on a formal, structured process for selecting the sample population, but is left largely to the discretion of the person performing the sampling.

For all sampled pay periods, M&J reviewed the provided supporting documentation to confirm the following:

- That appropriate approvals during the payroll process were recorded, including approvals during payroll processing (*i.e.*, timeclock report and payroll register approvals)
- That granted leave was properly approved in advance by management
- That, for hourly staff, hours reported on the payroll register are supported by timesheet reports or other supporting documentation
- That payroll calculations were performed correctly
- That pay rates have not changed since the prior sampled pay period without documentation evidencing the change

M&J observed signatures or emails showing that all required approvals were received for the payroll process (*i.e.* approvals of the final timeclock report and payroll register) for all but one of the sampled payroll periods; the Town was not able to provide any documents showing the Town Administrator’s approval of the payroll register for the 1/2/2023 pay period.¹⁰

The Town tracks leave approvals (*e.g.* paid time off (“PTO”), in its ADP-integrated timeclock system. M&J reviewed reports from the timeclock system confirming that PTO and other leave reflected on the sampled payroll registers and timesheets for the Town’s hourly staff was properly approved by departmental management. M&J confirmed that all reported PTO was properly approved by management for two of the six sampled monthly/salary pay cycles. M&J confirmed that the hours reported by hourly staff on the payroll registers for the sampled pay periods were supported by timesheet reports or other supporting documentation.

M&J re-performed payroll calculations and confirmed that the pay totals (gross and net) shown on the sampled payroll registers are correct. M&J additionally confirmed that, with two exceptions, pay rates did not change outside of the “standard” compensation adjustment periods at the start of the new fiscal year (“standard” compensation adjustments are discussed in the following sub-section). The two instances where pay rates did change after the start of the fiscal year were for the Town’s contracted police officers, whose pay rate was increased due to a new contract between the Town and the Charleston County Sheriff’s Office, and the Town Administrator, whose pay rate was increased after signing a new contract with the Town in October 2023. The Town was able to provide the contracts supporting these pay increases.

Compensation Adjustments

M&J performed additional testing related to the compensation adjustment process for the six sampled pay periods which were the first pay periods of the fiscal year for which compensation adjustments were applied (three pay periods each for hourly and salaried employees). To test compensation adjustments effective in 2022 (FY23), 2023 (FY24), and 2024 (FY25), M&J requested a total of 71 compensation adjustment letters, covering all impacted employees from all sampled pay periods.

¹⁰ The Accounting Business License Specialist was on leave during the processing of the 1/2/2023 payroll cycle, so the Finance Director performed the Accounting Business License Specialist’s role in the payroll process. In order to preserve separation of duties, the Town Administrator had to perform the payroll register review and approval normally performed by the Finance Director for this pay cycle.

For the pay periods in which compensation adjustments were first applied, M&J reviewed the compensation adjustment letters and other supporting documentation to confirm the following:

- That compensation adjustment letters were dated prior to the pay period in which the new rate would be reflected
- That compensation adjustment letters were considered the “final” letter and were properly approved, including signatures by the Mayor, Town Administrator, and employee
- That rates shown on compensation adjustment letters matched the rate noted in payroll records (including recalculating and validating conversions between hourly, monthly, and annualized rates)
- That for any one-time compensation adjustments, such as bonuses, the amount listed in the relevant compensation adjustment letter matched the amount shown in the payroll register
- That, if the compensation adjustment was not applied in the payroll system in the first pay period after the adjustment became effective, any required “back pay” was calculated and paid out properly

Figure 11 details the results of M&J’s evaluation of the sampled compensation adjustments.

Figure 11: Compensation Adjustment Sample Testing Results

Adjustment Year	Requested Letters	Provided Letters	Complete & Accurate	Missing Employee Signature	“Back Pay” Proper
2022	21	21	21	0	N/A
2023	23	22	20	2	N/A
2024	27	27	20	7	27
TOTAL	71	70	61	9	27

The Town was able to provide 70 of the 71 requested letters. For the one sample with no available letter from 2023, M&J reviewed the compensation adjustment for that employee and found that it was generally aligned with the range of adjustments that other employees received in that period.

For 2023 and 2024, 10 “final” compensation letters (*i.e.*, compensation adjustment letters showing signatures from the Mayor, Town Administrator, and employee) were not available. The Town noted that the recent flooding in the Town Hall resulted in the loss of some original documents, which likely included these final, employee-signed compensation letters. As noted in Figure 11, the Town was able to provide the draft letter signed by both the Mayor and the Town Administrator for nine of the 10 samples missing “final” compensation letters. The Town noted that, starting with the compensation adjustments for 2025 (*i.e.*, FY26 compensation adjustments), electronic copies of the “final” compensation letters were being retained. For the 70 compensation letters reviewed, all of them were dated prior to the pay period in which the new rate would be reflected. For all 70 tested samples, M&J verified the match of the compensation rate in the letter to the compensation rate on the payroll register, including re-calculating any conversion between hourly rates, annualized salaries, and monthly salary rates.

There were 25 bonuses included on tested compensation adjustment letters; all bonuses on the sampled payroll registers were also documented in a compensation letter, and the bonus amounts matched between the compensation adjustment letter and relevant payroll register.

For the 2022 and 2023 compensation adjustments, the Town applied the new pay rates in the first pay periods after the effective date of the compensation adjustments. For the 2024 compensation adjustment, however, the Town did not apply the new pay rates until the second pay periods (for both the biweekly/hourly payroll cycle and the monthly/salary payroll cycle) after the compensation adjustments became effective. As a result, the Town had to include “back pay” in the second pay period of FY25 to account for the fact that the new pay rates were not applied in the prior pay period. M&J reviewed additional documentation, including payroll documents from the prior pay periods, and confirmed that “back pay” was calculated and awarded correctly.

Payroll Sample Testing Summary: M&J’s evaluation of the payroll and compensation adjustment samples show that the Town generally operates in accordance with its policies and procedures and that internal controls appear to be sufficient, although the Town does not consistently retain all documentation needed to verify complete compliance. The Town has indicated that it has already taken steps to improve the retention of at least some parts of its payroll documentation, by retaining digital copies of compensation adjustment letters.

Treasury Management

To test the Town’s treasury management function, M&J used convenience sampling¹¹ to sample nine months across FY23, FY24, and FY25 and reviewed the Town’s banking and investment account statements for the sampled months. To evaluate the sampled months, M&J asked the Town to provide all bank statements, investment account statements, bank reconciliations, and cash drawer reconciliations for the sampled months. The Town provided all requested documents for all nine sampled months.

M&J reviewed the provided documents to validate the bank reconciliations for the sampled months, which included performing independent calculations to verify that the ledgers reconcile properly and reviewing stale checks listed in the bank statements for reasonableness. M&J also reviewed supporting documentation to confirm that the reconciliations were properly approved. M&J confirmed that the Town performed proper and timely reconciliations on the bank and investment statements for each sampled month and that all sampled reconciliations contain the required signatures and approvals. M&J confirmed that the Town performed cash drawer reconciliations for all nine sampled months.

Treasury Management Sample Testing Summary: M&J’s evaluation of treasury management samples showed that the Town’s existing controls are effective and implemented consistently.

¹¹ Convenience sampling, also known as haphazard sampling or accidental sampling, is not based on a formal, structured process for selecting the sample population, but is left largely to the discretion of the person performing the sampling.

5. Findings, Observations, and Recommendations

Overall, the Town has a number of effective internal controls and leading practices designed to mitigate risk and position the Town for financial success. The Town is in an overall mature position, with well-designed processes and controls, and the Finance Department serves as a strategic collaborator with other Town departments as well as elected officials and governing committees.

There are still some opportunities for continuing improvement. During fieldwork, M&J made a number of findings and observations related to the Finance Department and the Town's general financial operations. This section of the report details M&J's findings and observations and provides M&J's associated recommendations. Findings represent issues observed by M&J that present an elevated risk level, but do not represent a material impact on the current financial position of the Town. Elevated risks, typically either likelihood or impact, determine if M&J utilizes the "finding" categorization. Town management has the ultimate responsibility to determine which, if any, of the included recommendations are to be implemented and the timing of such implementation.

M&J's recommendations represent options for how findings and observations can be remedied, but do not represent all viable options. The Town may make strategic decisions that may warrant recommendations not being implemented exactly as stated in the report such as determining different solutions that remedy the situation in a different manner while still achieving a positive outcome. M&J's recommendations are compiled into a "roadmap," including M&J's suggested prioritization and implementation time guidance, which is located in Appendix C: Compiled Recommendations. Town leadership has prepared a Management Response to M&J's findings, observations, and recommendations, which is included at the end of Appendix C: Compiled Recommendations.

Findings

Findings represent potential issues observed by M&J that present an elevated risk level. The findings in this report do not represent a material impact on the current financial position of the Town. Elevated risks, typically either likelihood or impact, determine if M&J utilizes the "finding" categorization.

Finding 1: The Town Administrator currently allows certain Town administrative staff to borrow their Town-issued credit card to make authorized purchases, without requiring the staff to check the card out/in when they borrow/return the card or record the intended purchase. The Town's current credit card policies do not prohibit cardholders lending their card to other Kiawah Island officials or staff or provide regulations regarding how cardholders are to lend out their cards. Additionally, the Town's policies do not inform cardholders of the fact that they may be taking on significant risk by lending out their Town-issued cards, due to the fact that the cardholder is the only authorized holder of the card. This is an inadequate control of a cash-like asset. M&J did not identify any instances of unauthorized or fraudulent credit card use during its credit card sample testing. M&J determined that this issue is a finding as the risk profile of this issue is categorized as high likelihood, although the materiality is still low financial impact.

Recommendation 1: The Town should determine whether it will allow cardholders to lend their physical card to other Town staff for presentation at local vendors. If the Town does decide to allow cardholders to lend their card to other Kiawah Island officials or staff, the Town should introduce a process that requires cardholders to document card lending, including requiring borrowers to identify their intended purchase before borrowing the card and sign the cards out/in when they borrow/return the card. The updated credit card policy and/or process should clarify who carries liability for purchases made with borrowed cards, including how misuse of borrowed cards interacts with any standardized disciplinary process established by the credit card policy.

Finding 2: While testing samples of the Town’s procurement activity, the Town was not able to consistently provide sufficient documentation to support thorough testing. The Town was unable to provide any records related to one of the sampled procurements. Of the nine purchases for which records were provided, the Town was only able to provide solicitation or specification documents for four of the purchases. The Town identified that the procurement process for two of the sampled purchases involved having members of a selection committee perform formal bid/proposal evaluations, but the Town was unable to provide completed bid evaluation worksheets for either purchase, stating that the members of the selection committees did not return the completed worksheets to the Town Clerk for recordkeeping and retention. Due to the lack of relevant procurement records, the Town cannot validate that all purchases were conducted in accordance with the Town’s procurement ordinance and relevant State purchasing regulations. M&J determined that this issue is a finding as the risk profile of this issue may have trust impact, in addition to the medium likelihood and medium financial impact.

Recommendation 2: The Town should refine its policies and procedures related to the creation, collection, and retention of documentation related to Town procurement activity. The revised procurement document management policies and procedures should require Town staff to prepare, collect, and retain all relevant procurement records, including solicitation and specification documents, records evidencing public notice of solicitations, all bids and proposals received, records of communications with interested vendors, completed bid evaluation documents, documents supporting non-competitive purchases (including sole source findings, emergency purchase authorizations, and copies of cooperative or other public entity contracts that the Town purchases off of), full bid evaluation documents, intent to award notices, and final contracts. ToKI should create a dedicated file for each purchase that the Town makes which it should use to store all relevant records.

Observations

Observations represent items that M&J noted during fieldwork where there may be an action available that either reduces risk, enhances efficiency, or otherwise improves observed business processes. M&J’s recommendations represent options for improvement, but do not represent all viable options. The Town may make strategic decisions that may warrant recommendations not being implemented exactly as stated in the report such as determining different solutions that remedy the situation in a different manner while still achieving a positive outcome.

Observation 3: The Town's primary governing document for finance-related functions is the Accounting Policies and Procedures guide. Updating the Accounting Policies and Procedures guide requires Town Council approval. The Accounting Policies and Procedures guide contains both high-level policies, guiding the overall direction of the Town's financial processes and establishing frameworks to support the Town's financial controls, and low-level processes, which contain step-by-step details of how the Town uses its various systems to carry out its key functions. While it makes sense for the Town to contain many high-level processes in a document issued by the Town Council, requiring revisions to low-level processes to also go through the Town Council's approval process prevents the Town from modifying policies at short notice. The Town may occasionally be faced with situations where accounting procedures must be adapted quickly, such as in response to regulatory changes, updates for changes in software functionality, or to address pressing concerns or otherwise adapt to current conditions in between Town Council meetings.

Recommendation 3: The Town should adapt the Accounting Policies and Procedures guide into two separate governing documents, including one document of finance-related policies and a separate document of finance-related processes and procedures. Updates to the finance-related policies and procedures guide should require the approval of the Town Council, while the Finance Director should be able to update the finance-related processes and procedures guide with the approval of the Mayor and/or Town Administrator, or to conform with updates to South Carolina law, code, or governing accounting principles.

Observation 4: When reviewing various work performed by Finance Department staff, the Finance Director often uses reports exported from the Town's various financial software platforms and printed by the staff performing the original work. For example, the Finance Director reconciles Wells Fargo's check run documentation against the Incode check register using versions of the reports that were downloaded from the Wells Fargo website and Incode and printed by the Accounting Specialist/Court Clerk. Some of the printed reports that the Finance Director reviews in this way are exported as easily editable formats, such as .csv or .xlsx files, which creates a risk that the reports being reviewed by the Finance Director do not agree with the actual entries in the Town's various software systems.

Recommendation 4: The Town should update its procedures to require that staff reviewing financial work performed by others utilize independently sourced reports and records to ensure that the reports are an accurate representation of the entries in the Town's various financial software systems.

Observation 5a: The Accounting Specialist/Court Clerk uses an ex-employee's user login to access the Wells Fargo online platform for processing the weekly check run. Using recycled accounts and accounts associated with past employees exposes the Town to a variety of security and internal control risks, including the fact that those ex-employees may maintain access to their former account (or could regain access to the accounts due to the fact that the accounts are still in their name) and the fact that the current employee is operating under a different person's name, making it difficult to attribute actions performed on the account to the correct individual.

Observation 5b: The Accounting Specialist/Court Clerk stores the password that they use to access the Wells Fargo online platform on a piece of paper stored in their office, nearby to the hardware two factor authentication (“2FA”) key that they use to access sensitive functions within the Wells Fargo online platform. Writing down passwords and storing them in the office is generally poor security practice, as this may allow malicious actors to access the passwords and obtain unauthorized access to accounts. If passwords are to be stored in unsecured or lightly secured areas, they should be stored separately from 2FA keys configured for the same account. 2FA is a leading security practice, but it relies on the two security factors (the password and the hardware key, in this case) being stored separately.

Observation 5c: the Town does not currently require authorized users to periodically log in to assigned accounts in order to verify that the accounts are functioning properly.

Observation 5d: ToKI uses access and permissions controls as part of its controls and security model, with access highly restricted for certain sensitive software platforms. For example, the Town restricts access to Incode’s AP module to Finance Department staff, restricts access to the ADP software platform used for processing payroll to the Finance Director and Accounting Business License Specialist for processing and to the Mayor and Town Administrator for reviewing, and the Town restricts access to the Wells Fargo online platform to specified Finance Department staff and Town leadership (with certain sensitive functions restricted even further). Because access and permissions management play a critical role in the Town’s control and security model, the Town must ensure that actual access and permissions configurations match the Town’s intended and designed access and permissions structure.

Recommendation 5a: The Town should begin conducting regular account audits of sensitive financial software platforms to identify and remove unauthorized accounts, ensure that all authorized accounts are active and accessible, and confirm that account permissions agree with the Town’s intended permissions control model. All accountholders should hold individual accounts (*i.e.*, account sharing should not be permitted) and accounts should be assigned to individual employees. The Town should require staff with accounts in the Town’s various sensitive financial systems to periodically log in to these accounts in order to maintain access and verify that the accounts are functioning properly.

Recommendation 5b: The Town should implement a cybersecurity policy that requires staff to adhere to cybersecurity best practices, such using complex passwords and refraining from storing passwords in unsecured locations. To support adoption of this cybersecurity initiative, the Town should consider providing staff with subscriptions to an enterprise-grade password manager.

Observation 6a: While the Town uses the mail log to track chain of custody for checks received through the mail, Kiawah Island does not consistently utilize logs to record checks delivered in-person by individuals or businesses to staff working in Town Hall. As a result, the Town does not have logs showing who is in possession of each check received by the Town at any given point in time.

Observation 6b: During the weekly check run, the Town often directs the Town’s check printing service to mail certain checks to Town Hall instead of directly to the payee, including checks for employee reimbursements as well as checks for certain vendors or grant recipients. Once these checks are received at Town Hall, the Town does not maintain any log recording the distribution of these checks and therefore has no way to confirm through records that checks were distributed to the intended recipient.

Recommendation 6: The Town should modify its processes for handling checks, including both checks made out to ToKI and checks made out by ToKI, to ensure that the Town maintains a consistent chain of custody for all checks from the time that they arrive at Town Hall to the time that they are deposited (for checks made out to ToKI) or are received by their final recipient (for checks made out by ToKI). The Town may use its various software systems which it uses to track payments (such as CitizenServe and Incode’s court and utility billing modules) to track checks that are recorded immediately after receipt and should use a dedicated check tracking log to track checks that are not immediately recorded in one of the Town’s software systems after receipt.

Observation 7: In interviews, certain Town staff indicated confusion over the implementation of aspects of the Town’s ethics policies, including the Town’s gift policy, with staff expressing uncertainty regarding perceived inconsistency in application of the policy and a lack of clarity regarding disclosure procedures. Additionally, certain Town staff reported that they were either not aware of or not comfortable using the Town’s options to report suspected misconduct either anonymously or through alternate reporting pathways under the Town’s whistleblower policy.

Recommendation 7: The Town should review the implementation of the Town’s existing ethics policies and update the policies as appropriate and/or develop supporting ethics procedures/documentation that goes beyond merely stating the policies and instead explains the usage of the policies in detail. The Town may wish to provide periodic training on its ethics policies to Town employees above and beyond the ethics acknowledgement form that the Town requires staff to sign annually in order to help ensure that Town staff have consistent understanding of the expectations and demands placed on them by the Town’s ethics policies.

Observation 8: The Town currently pays nearly all vendors and other payees by either mailing printed checks to the vendor address on file or hand-delivering printed checks. The Town does not currently offer alternate payment methods, such as automated clearing house (“ACH”) payments, to Town vendors or grant recipients. ACH and other alternate payment methods are often faster, easier to process, and have lower administrative fees than paying by check. Additionally, paying with physical checks introduces the risk of checks being lost, stolen, or damaged. Per interviews, the Town is in the process of introducing ACH for vendor payments.

Recommendation 8: The Finance Department should continue the process of implementing ACH payments for vendor payments. Once the Town has successfully implemented ACH payments for vendor payments, the Town should encourage vendors to transition to ACH payments and assist vendors through the transition process.

Once the Town has introduced ACH payments, it will also need to update its vendor management procedures, including creation of a vendor management form that requires the vendor to identify financial and operational contacts, include a voided check and/or banking relationship confirmation, and should introduce processes that require independent verification of any requested changes to vendor information, such as banking information, primary contacts, or other information that may increase risk of fraudulent payments.

Observation 9: The Town does not have a standardized receiving record form or have an established process detailing what department managers are required to confirm before authorizing payment on an invoice. The Accounting Specialist/Court Clerk does require management in the department making a purchase to approve payment on an invoice before the payment is processed, but that acknowledgement may take several forms (typically a signature on an invoice or an email). Additionally, the current approval process does not contain a specific confirmation that all goods and services included in the invoice have been fully received and accepted by the Town.

Recommendation 9: The Town should update its Accounts Payable (“AP”) process to require management within departments making a purchase to complete a consistent receiving record form (or provide a packing slip, bill of lading, or other documentation of receipt) prior to Finance issuing payment on an invoice, or at least document on the invoice that all goods have been received. The Town should ensure that the department managers understand that their signature on a request for payment represents their attestation that all goods and/or services have been received in compliance with the terms of the contract/order.

The Town should also consider introducing vendor performance forms, specifically for use in service contracts, or goods/materials contracts with multiple components or complex requirements. The vendor performance management forms should be several questions that allow the Town to evaluate vendor performance, with consideration for communication, timeliness, and whether the deliverable(s) met the terms of the contract or order. Vendor performance forms should be maintained as part of the contract file, and the Town may consider use of performance forms to determine whether a vendor would be recommended for future use by the Town, or if use of the contract’s cure and other remedies should be utilized to address documented performance concerns.

Observation 10: M&J sampled five AP payments made using the check request/reimbursement forms and associated process. While the Town’s check request/reimbursement form states that all forms must be accompanied by some form of supporting documentation, two of the five sampled payments were not supported by any additional documents or written statements identifying why supporting documentation was not included along with the form.

Recommendation 10: The Town should review its processes for processing check request/reimbursement forms and determine whether there are payments that should be exempted from the requirement to attach supporting documents. If the Town decides that certain payments can be exempted from the supporting document requirement, the Town should specify the types of exemptions allowed and update the check request/reimbursement form to provide applicants with a space to provide a written justification for the lack of supporting documents. If the Town determines that no exemptions should be given to the supporting document requirement, the Town should re-emphasize the supporting document requirement and require Finance Department staff to reject all check request/reimbursement forms that are not accompanied by adequate supporting documents.

Observation 11: The Town does not have a standardized policy or process for creating or updating vendor profiles. As a result, Town staff currently update vendor profiles as they feel is necessary, sometimes based on noticing updates to the information displayed on invoices, and without being required to conduct an independent verification of the changes with the vendor. The lack of independent review of vendor information increases the risk that the Town could be impacted by vendor impersonation fraud.

Recommendation 11: The Town should implement a policy and process for creating and updating vendor profiles that requires ToKI staff to verify all submitted information through a trusted, independent communications channel, such as having an in-person meeting or calling a trusted phone number. As certain alternate payment methods, such as ACH, may increase the damages of vendor impersonation fraud, the Town should ensure that it implements this policy or process before widely offering ACH payments to vendors and may wish to consider implementing stricter verification levels for vendors that make use of ACH payments. At a minimum, the Town should require staff to independently verify updates to vendor routing information through a trusted source before approving vendor profile changes.

Observation 12a: The Town states that it makes an effort to receive W-9s from each of its vendors, although the Town does not currently require staff to verify that the Town has a W-9 on file with the Town before issuing payment. Organizations are generally required by the Internal Revenue Service (“IRS”) to obtain W-9s from their vendors and retain those forms on file in order to file information returns if necessary.

Observation 12b: The Town does not currently have a process in place to periodically review the W-9s that it has on file for its vendors to ensure that they are up to date. While W-9s do not technically expire and the IRS does not generally require organizations to periodically obtain new W-9s from its vendors, it is generally considered best practice to periodically request updated W-9s from vendors in order to ensure that the information included in the form is up to date.

Recommendation 12: The Town should update its vendor management processes to require Finance Department staff to obtain signed and dated W-9s from all applicable vendors prior to issuing payment on invoices issued by those vendors. Additionally, the Town should begin conducting periodic vendor reviews to confirm that the W-9s that the Town has on file from active vendors are up to date by requesting new signed and dated W-9s from vendors whose W-9s on file are dated more than two years old or are undated.

Observation 13: The Town does not currently have a formal, comprehensive, written policy or process detailing all rules and regulations that govern use of the Town’s credit cards. Additionally, the Town does not have a standardized process for ensuring that cardholders are trained on the various written and unwritten credit card policies and processes that do currently exist. As a result, staff may be unsure of exactly how they should use and safeguard their cards and are not subject to standardized, well-understood disciplinary policies.

Recommendation 13a: The Town should develop and formally adopt a written, comprehensive credit card policy. The Town’s comprehensive credit card policy should explicitly lay out what constitutes permissible credit card usage and what type of credit card usage is not allowed. Additionally, the policy should include clear disciplinary procedures for credit card misuse, including a progressive disciplinary policy that provides for increasing consequences for repeated credit card misuse, up to and including revocation of credit card access. The credit card policy should detail the one-time (*e.g.*, repayment of a charge) and progressive disciplinary consequences of the specified credit card usage violations.

Recommendation 13b: The Town should develop a training program for cardholders, including training for new credit card holders, remedial training for cardholders that violate the Town’s credit card policy, and periodic retraining for all cardholders. As part of the training program, cardholders should be required to sign documents affirming that they understand the rules of the Town’s credit card program and agreeing to abide by the rules and any consequent discipline.

Observation 14a: The Town’s current credit card policy provides cardholders with a range of credit lines, from \$1,000 at the smallest to \$50,000 at the largest. The cards with the highest credit limits allow for the cardholders to make purchases far above and beyond their typical credit card usage patterns, which presents an increased risk if unauthorized parties were to obtain one of these high-limit cards.

Observation 14b: When reviewing credit card statement samples, M&J identified two instances where cardholder exceeded their established credit limits. In both instances, Finance Department staff made mid-cycle payments on the card balances to free up credit so that the cardholders could continue to use their cards. In one instance (for the Accounting Business License Specialist’s card), Finance Department staff had to make two total mid-cycle payments in order to keep the cardholder from exceeding their credit limit at an earlier point in the month. The Accounting Business License Specialist primarily uses their cards to pay for subscriptions and expenses for other Town staff or for general Town Hall operations. The Town does not currently have a process that allows cardholders to request one-time credit line increases for unusually large purchases.

Recommendation 14a: The Town should review the typical use patterns of cardholders to develop an understanding of each cardholder’s typical credit needs. The Town should then use the collected information on typical credit usage to adjust card limits based on anticipated card usage to ensure that credit limits match the need exhibited by each cardholder’s position. When modifying credit limits, the Town should balance cardholder needs and typical usage and the risk posed by cards having credit limits greatly in excess of standard card usage patterns.

Recommendation 14b: The Town should consider introducing the use of “ghost” cards (*i.e.*, virtual cards for dedicated virtual use cases) or create a new card dedicated for use for recurring subscriptions.

Recommendation 14c: The Town should introduce a process that allows cardholders to request one-time credit increases on their cards to allow for exceptional demands. The process should require the cardholder to list the intended use and provide a justification as to why this purchase cannot be completed using an alternate payment method.

Observation 15: When reviewing sampled credit card statements and supporting documentation, M&J did not identify any supporting documents (*e.g.*, receipts) for 16 of the 90 charges included in the sample, including a 12 recurring or subscription payments and four payments that appear to be one-off, non-recurring payments. While the Town does not have a comprehensive, written credit card policy detailing exactly which payments need to be supported by receipts, interviews with Town staff indicate that receipts are required for all non-recurring charges but are generally not required for recurring charges.

Recommendation 15: As part of developing a new, written credit card policy, the Town should clearly identify which types of credit card purchases are exempt from receipt retention/submission requirements and develop a standardized method for identifying exempt payments in the monthly reconciliation. If Kiawah Island leadership determines that recurring payments should be exempt from standard credit card receipt retention/submission requirements, they should specify what alternate reporting requirements are imposed instead, such as requiring a receipt for at least one payment per year, or a statement/receipt that defines the total annual charge and is reviewed and validated, and how the alternate reporting requirements are to be tracked.

Observation 16: The Town's recently updated procurement code provides for four methods of formal, competitive procurement. While each of the methods provide different benefits and drawbacks, the procurement code does not provide guidance regarding how the formal, competitive procurement method for any particular purchase is selected or what factors should be considered when selecting procurement methods, which may result in inconsistent treatment of similar or equitable purchase types.

Recommendation 16: The Town should develop and formally adopt procedures governing the selection of formal, competitive procurement methods. Additionally, the Town should develop guidance for the officials and staff tasked with selecting the formal, competitive procurement method for each purchase that they can use when making that selection. Among other relevant factors, the guidelines should consider the type of good or service being purchased and the expected purchase value.

Observation 17: The Town's current debt management policy delegates responsibility for developing processes related to issuing, paying, and accounting for long-term debt to the Finance Director. The Town does not currently hold any long-term debt but indicated that it could consider issuing long-term debt for capital projects in the foreseeable future. The written debt-related processes that the Finance Director currently has in place are of limited detail and would not be sufficient to manage any significant amount of debt that the Town may issue.

Recommendation 17: The Town should develop robust debt management procedures prior to any future Town issuances of long-term debt. The Town's debt management procedures should detail the responsibilities of Town management and Finance Department staff as they relate to the debt issuance (including strategic and financial planning), making debt service payments (including the use of sinking funds), and accounting for and reporting on debt.

Observation 18a: The Town awards charitable grants to 501(c)(3) non-profit and/or charitable organizations that support community services in the greater Johns Island and Wadmalaw Island communities. As part of the grant application, the Town does not require applicants to disclose any relationships that they may have with Town staff or officials, including the members of the Town Council that make the ultimate grant award decisions, or to sign a non-collusion pledge.

Observation 18b: Many of the recipients of Kiawah Island's charitable grants are repeat recipients and the Town evaluates the performance of repeat charitable grant awardees by requiring applicants that are existing grant recipients to provide details on how funds from the past year's grant award were used in their next grant application. The Town does not require awardees to provide any other performance reporting, which limits the Town's ability to evaluate the performance of one-time charitable grant recipients.

Recommendation 18a: The Town should require charitable grant applicants to disclose any relationships that they have with Town staff and officials and sign a non-collusion pledge.

Recommendation 18b: In order to better assess the performance of new charitable grantees, the Town should introduce additional performance reporting requirements for first-year grant recipients, such as requiring grantees to provide a mid-year performance and expense report in their first year of receiving funds.

Observation 19: The Town accepts applications for SATAX grants from organizations, including for-profit and non-profit organizations, to provide programs or activities in the Kiawah area that will support local tourism. The Town's SATAX grant application form, as currently written, is primarily designed for applicants hosting concerts, festivals, or other short-term events. As a result, applicants for tourism-promoting projects and activities other than short-term events, such as marketing campaigns or conservation efforts, are not able to adequately complete a number of fields on the form. As a result, long-term project applicants are forced to either leave certain fields blank or provide inadequate responses in certain areas.

Recommendation 19: The Town should redesign the SATAX grant application form to better account for multiple common types of applicants. The Town may wish to consider introducing multiple sections to the form for different types of applications, such as one section for short-term events and another section for long-term programs or ongoing efforts, and ask applicants to only complete the sections that apply to their particular application. After implementing the redesigned forms, the Town should strictly enforce requirements that applicants fully complete all applicable sections of the application in order to be considered for funding.

6. Conclusion

M&J commends Kiawah Island's leadership for commencing this Operational and Performance Assessment, as this process has been in-depth and has brought to light both the Finance Department's accomplishments and the opportunities for improvement needed for it to achieve operational excellence. The Finance Department is fairly mature, currently operating efficiently in certain ways and has a number of effective controls in place, but also has opportunities to improve. The Town now better understands the Finance Department's current state and has a roadmap for continual improvement into the future.

Appendix A: Key Control Matrix

The Town’s current policies and procedures, both written and unwritten, include a number of internal controls. The following pages detail the internal controls currently in place related to the Finance Department’s major functional activities.

Category	Functional Activity	Key Control Step(s)
AP	Preparing and submitting invoices for payment	<ul style="list-style-type: none"> Management within department making purchase must approve invoice for payment (email or signature), other than regular/recurring payments (e.g., utility payments, Town Hall custodial service)
AP	Preparing and submitting check and reimbursement requests for payment	<ul style="list-style-type: none"> Preparer must attach relevant supporting documentation Request form must be signed by department head/committee chair and Town Administrator or Mayor
AP	Preparing check runs	<ul style="list-style-type: none"> The Accounting Specialist/Court Clerk reviews to ensure that all invoices and check/reimbursement requests are complete and have required approvals Both the Finance Director and Town Administrator must review and approve payable register before further processing of payment batch
AP	Issuing checks	<ul style="list-style-type: none"> The Finance Director reconciles and approves printouts of Incode check register and Wells Fargo check listing prior to finalizing check payment in Wells Fargo online portal Wells Fargo mails checks directly to the recipients or to the Town for further distribution
AP	Vendor Management	<ul style="list-style-type: none"> The Finance Director and Accounting Specialist/Court Clerk review all vendors with activity following the end of each calendar year in order to identify vendors for whom the Town must prepare Forms 1099 While processing invoices, the Accounting Specialist/Court Clerk reviews to confirm that the information shown on the vendor profile matches the information shown on the invoice, including vendor name and contact information
AP	Charitable grants administration	<ul style="list-style-type: none"> The Town awards charitable grants on an annual cycle, with all awards being made based on grant applications that detail the intended use of the requested funds. Current charitable grant awardees must include documentation showing that they have used the previously awarded funds for the specified purposes (or explaining why funds were not used as indicated) during subsequent grant applications

Category	Functional Activity	Key Control Step(s)
AP	SATAX grants administration	<ul style="list-style-type: none"> The Town awards SATAX grants on an annual cycle, with all awards being made based off of grant applications that detail the intended use of the requested funds and the expected impact of the project or activity that the grant would support. Current SATAX grant awardees must include documentation showing how grant funds were used during the prior year and detailing the impact of the grant-supported project or activity Awarded SATAX grant funds are distributed by check as reimbursement for actual eligible expenses incurred providing the awarded project or activity
Credit Cards	Card use	<ul style="list-style-type: none"> Cardholders are required to retain receipts for all purchases made with their Town credit card other than recurring payments (e.g., monthly software subscriptions) Cards are configured to have a set monthly credit limit, after which additional purchases with the card are declined (although the Finance Director or Accounting Business License Specialist can make mid-cycle payments in the event that a cardholder reaches their credit limit partway through a billing cycle)
Credit Cards	Monthly reconciliation	<ul style="list-style-type: none"> Cardholders submit receipts to the Accounting Business License Specialist, who reconciles the provided receipts against the card statement The Town Administrator must review and approve reconciled credit card statements and accompanying receipts (the Mayor performs this review/approval for the Town Administrator's credit card) The Finance Director must review and approve reconciled credit card statements and accompanying receipts
AR	Receiving cash payments	<ul style="list-style-type: none"> Staff receiving the payment make change as needed, prepare a receipt for the payer using a Town form (retaining a carbon copy), prepare a deposit slip and deliver the funds to the Accounting Business License Specialist in a locked deposit bag along with the deposit slip, and record payment in the relevant service management software system (i.e., Incode's Court module, Incode's utility billing module, or CitizenServe) The Accounting Business License Specialist performs deposit transactions and prepares journal entries in Incode to record payment to appropriate General Ledger revenue account The Finance Director reviews cash deposits as part of the monthly bank reconciliation process The Accounting Business License Specialist performs monthly counts of the cash drawers issued to the Accounting Specialist/Court Clerk and Permit Technician

Category	Functional Activity	Key Control Step(s)
AR	Receiving check payments	<ul style="list-style-type: none"> • Staff receiving in-person check payments prepare a receipt for the payer using a Town form (retaining a carbon copy) and deliver checks to Accounting Business License Specialist for deposit • The Finance Assistant identifies checks received in the mail, records the checks in the Town's mail log, stamps the checks as "For Deposit Only," and delivers them to the Accounting Business License Specialist for deposit (signing for receipt in the mail log) • The Accounting Business License Specialist deposits checks daily and prepares journal entries in Incode to record check payments to the appropriate General Ledger revenue accounts. • The Accounting Business License Specialist records checks received by the Town's "lockbox" check processing service by downloading a report from Wells Fargo and uploading the report to Incode to create appropriate journal entries • The Finance Director reviews check deposits as part of the monthly bank reconciliation process
AR	Receiving credit card payments	<ul style="list-style-type: none"> • The Town receives credit card payments using either Clover credit card readers or the Town's online payment portals, after which payers receive either physical or emailed receipts • Staff record payments made with Clover machines to the appropriate service management software system (<i>i.e.</i>, Incode's court module, Incode's utility billing module, or CitizenServe); payments made through the Town's online portals are automatically recorded • The Accounting Specialist/Court Clerk downloads payment records from the service management software system to verify the completeness and accuracy of statements provided by the payment processor prior to posting receipts to the General Ledger
AR	Receiving remitted revenues	<ul style="list-style-type: none"> • The Finance Director reviews journal entries prepared by the Accounting Business License specialist to record State remitted revenues prior to posting, confirming that the journal entry matches the actual revenue received and the revenue memo • The Finance Director reviews ACH payments and check deposits as part of the monthly bank reconciliation process
AR	Recording interest revenues	<ul style="list-style-type: none"> • The Finance Director submits a quarterly report to the Town Administrator and Ways & Means Committee detailing the Town's investments and their performance • The Finance Director submits an annual report to the Town Council summarizing the investments held by the Town and their performance

Category	Functional Activity	Key Control Step(s)
Purchasing and Procurement	Small purchases	<ul style="list-style-type: none"> All purchases must approved prior to making the purchase Purchases of at least \$5,000 but no more than \$20,000 must be supported by at least three written quotations and must receive special approval from the Mayor to be awarded to quotes other than the lowest quote Purchases of at least \$5,000 but no more than \$10,000 must be approved by both the Finance Director and the Town Administrator prior to purchase Purchases of at least \$10,000 but no more than \$20,000 must be approved by both the Mayor and any one member of the Town Council prior to purchase
Purchasing and Procurement	Formal purchases	<ul style="list-style-type: none"> Purchases of at least \$20,000 must be awarded using the Town's IFB, RFP, RFQ, or Reverse Auction procurement methods Purchases of at least \$20,000 must be approved by the Ways & Means Committee Purchases of at least \$100,000 must be approved by the Town Council
Purchasing and Procurement	Non-competitive purchases	<ul style="list-style-type: none"> Sole source purchases of at least \$20,000 must be approved by the Ways & Means Committee, while sole source purchases of at least \$100,000 must also be approved by the Town Council
Purchasing and Procurement	Exempt purchases	<ul style="list-style-type: none"> Exempt purchases of at least \$20,000 must be approved by the Ways & Means Committee, while exempt purchases of at least \$100,000 must also be approved by the Town Council
Payroll and Personnel	Timekeeping	<ul style="list-style-type: none"> Hourly employees record their time using an ADP-integrated timeclock system Management within each Town department is responsible for managing employee time off requests and approving leave requests for staff within their department
Payroll and Personnel	Payroll processing	<ul style="list-style-type: none"> Access to the Town's ADP payroll software is limited to the Finance Director and Accounting Business License Specialist (for processing) and the Town Administrator and Mayor (for reporting) Management of each department and the Finance Director both must review and the employee time reports before further payroll processing The Finance Director must review and approve the payroll register before the Accounting Business License Specialist can finalize the payroll submission in ADP All compensation adjustments (e.g., raises, bonuses) must be approved by the Town Administrator or Mayor prior to implementation

Category	Functional Activity	Key Control Step(s)
Treasury Management	Account management	<ul style="list-style-type: none"> • The Town limits access to its bank account to certain Finance Department staff and Town leadership, including the Finance Director, Accounting Business License Specialist, Accounting Specialist/Court Clerk, and Town Administrator • The Town's bank account logins are configured so that passwords periodically expire and must be replaced and so that logins become inactive if not used for an extended period of time • The Town's bank account website is configured so that users must use a physical 2FA security key to access certain sensitive functions, such as uploading check batches
Treasury Management	Bank reconciliations	<ul style="list-style-type: none"> • The Finance Director reconciles the Town's monthly bank statements against the General Ledger to confirm that the transactions recorded on the bank statement agree with the General Ledger • The Town Administrator reviews and approves the monthly bank reconciliation
Debt Management	Debt issuance	<ul style="list-style-type: none"> • The Town does not currently have any controls in place regarding debt issuance
Debt Management	Debt service	<ul style="list-style-type: none"> • The Town does not currently have any controls in place regarding debt service

Appendix B: Risk Assessment Detail

M&J conducted a high-level inherent risk assessment of the Finance Department's key processes to support its engagement planning efforts and help identify the processes for focused sample testing. M&J performed the risk assessment early in the engagement, prior to arriving on-site and conducting in-depth interviews with Town staff, using information gleaned from preliminary interviews with Town leadership and key Finance Department staff as well as select data, both provided by the Town in its initial document submissions and identified by M&J from publicly available sources (e.g., the Town's website). If significant variance was noted during the interview process, M&J would have updated the risk assessment to reflect new or materially different information. M&J's risk assessment was developed primarily to assist in planning and executing the Assessment and it may not be appropriate for use supporting projects or plans beyond the Assessment and any immediate follow-up work. Additionally, the risk ratings provided by M&J are not intended to replace the risk assessments of Town management and the Audit Committee. The Town should not substitute these ratings for its own judgement.

M&J's assessment evaluates the *inherent risk* of the identified processes, which is the risk of fraud, waste, or abuse posed to the Town by the process without considering any controls that the Town may have implemented. A process's inherent risk is determined by the fundamental nature of the Town's use of the process (e.g., the Town's basic needs and requirements, low-level functional details) and broader industry trends. The Town has limited influence over the inherent risk posed by its finance-related processes and must reduce risks to an acceptable level through the implementation of internal controls.

M&J's evaluation of the inherent risk of the Town's finance-related processes is based on three risk aspects

- **Inherent Risk Likelihood:** The likelihood of the process resulting in fraud, waste, or abuse, regardless of the severity of the incident
- **Inherent Risk Impact:** The likely severity of a fraud, waste, or abuse incident related to the process, regardless of how likely the incident is to occur
- **Fraud Risk:** The likelihood that the Town will be the target of attempted fraud related to the process

For each process, M&J assigned a score of "High," "Medium," or "Low" for each risk aspect. M&J's risk scores are subjective evaluations based on M&J's professional experience and a variety of quantitative and qualitative features of each process. M&J then used the assigned risk aspect scores to calculate each process's overall Inherent Risk Score. To calculate the Inherent Risk Score, M&J first converted the score assigned to each risk aspect into a number, with "Low" being assigned a value of one, "Medium" being assigned a value of two, and "High" being assigned a value of three, and then calculated a numeric Inherent Risk Score using the following formula:

$$\text{Inherent Risk Score} = (\text{Inherent Risk Likelihood} * \text{Inherent Risk Impact}) + \text{Fraud Risk}$$

The inherent risk formula produces values between two and 12. M&J then converted the values produced by the inherent risk formula into categorical Inherent Risk Scores using the thresholds shown in Figure 12.

Figure 12: Inherent Risk Score Classification Thresholds

Category	Values
Low	2 – 4
Medium	5 – 7
High	8 – 12

Figure 13 provides additional detail regarding M&J’s development of its risk assessment, including the scores assigned to each risk aspect and key factor(s) used by M&J in making its risk aspect score assignments.

Figure 13: Risk Assessment Calculation Detail

Category	Process	Inherent Risk Likelihood	Key Factor(s)	Inherent Risk Impact	Key Factor(s)	Fraud Risk	Key Factor(s)	Inherent Risk Score
AP	Invoice Processing	Medium	Volume of invoices processed	High	Value of invoices processed (total, average, and distribution)	Low	Prevalence of invoice-based fraud, Town's relationships with vendors	Medium
AP	Check Processing	Medium	Volume of checks issued, use of physical checks	High	Value of checks issued (total, average, and distribution)	Medium	Use of physical checks, prevalence of check-based fraud	High
AP	Vendor Management	Medium	Number of vendors managed	High	Value of payments received by Town vendors (total, average, and distribution)	High	Prevalence of vendor profile management fraud	High
Credit Cards	Credit Card Management	Medium	Number of cardholders	High	Credit line (total and per card)	High	Prevalence of credit card-based fraud, ease of making purchases without prior authorization	High

Category	Process	Inherent Risk Likelihood	Key Factor(s)	Inherent Risk Impact	Key Factor(s)	Fraud Risk	Key Factor(s)	Inherent Risk Score
AR	Payment Receiving	Medium	Volume of payments received	Medium	Value of payments received (total, average, and distribution)	Medium	Types and relative prevalence of various media used to receive payment (i.e., ACH, credit card, check, cash), prevalence of receiving-based fraud	Medium
Purchasing and Procurement	Solicitations	Medium	Volume of solicitations issued	High	Value of purchases awarded through competitive solicitations (total, average, and distribution)	Medium	Prevalence of solicitation fraud	High
Purchasing and Procurement	Contract Management	Medium	Number of existing contractors	High	Value of existing contracts (total, average, and distribution)	Low	Prevalence of fraud related to contract management	Medium
Payroll and Personnel	Payroll and Personnel Management	Low	Number of employees, payroll frequency, use of third-party payroll processing service	Medium	Value of payroll	High	Prior occurrence of payroll fraud within the Town	Medium
Treasury Management	Cash/Bank Management	Medium	Use of a single Wells Fargo account, volume of bank transactions	High	Typical bank account balance	Low	Prevalence of bank management-related fraud	Medium

Category	Process	Inherent Risk Likelihood	Key Factor(s)	Inherent Risk Impact	Key Factor(s)	Fraud Risk	Key Factor(s)	Inherent Risk Score
Treasury Management	Investment Management	Low	Use of a single LGIP account, volume of transactions	High	Typical investment account balance	Low	Prevalence of investment management-related fraud	Low
Debt Management	Debt Service	Low	Lack of outstanding debt	Low	Lack of outstanding debt	Low	Lack of outstanding debt	Low
Debt Management	Debt Issuance	Low	Lack of recent prior debt issuance	Low	Lack of recent prior debt issuance	Low	Lack of recent prior debt issuance	Low

Appendix C: Compiled Recommendations

The following pages detail M&J's recommendations for the Town and the Finance Department. The recommendations are assigned a recommended prioritization level for implementation and include a typical timeframe for initiating implementation. The detailed report should be read in its entirety to better understand the context for the identified observations and recommendations. Recommendations are prioritized as "high", "medium", or "low" based on M&J's assessment of the risk associated with the issue, as well as the dependency of addressing certain recommendations before others can be resolved. "High" priority recommendations, thus, should be reviewed relatively soon after report issuance, and an action plan identified. The suggested timelines represent M&J's assessment of when implementation should start for each of the recommendations, and do not necessarily represent that resolution should be within the noted timeframe. Given the Town's resources and required governance processes, not all recommendations may be fully implemented within the suggested timeframe, but M&J believes that substantive progress should begin within the noted timeframe. Town management has the ultimate responsibility to determine which, if any, of the included recommendations are to be implemented and the timing of such implementation.

Town leadership has prepared a Management Response to M&J's findings, observations, and recommendations, which is included following the compiled recommendations.

The Town and the Finance Department should dedicate resources and engage external specialists where needed to assist with implementation.

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 1: The Town should determine whether it will allow cardholders to lend their physical card to other Town staff for presentation at local vendors. If the Town does decide to allow cardholders to lend their card to other Kiawah Island officials or staff, the Town should introduce a process that requires cardholders to document card lending, including requiring borrowers to identify their intended purchase before borrowing the card and sign the cards out/in when they borrow/return the card. The updated credit card policy and/or process should clarify who carries liability for purchases made with borrowed cards, including how misuse of borrowed cards interacts with any standardized disciplinary process established by the credit card policy.</p>	1	1
<p>Recommendation 2: The Town should refine its policies and procedures related to the creation, collection, and retention of documentation related to Town procurement activity. The revised procurement document management policies and procedures should require Town staff to prepare, collect, and retain all relevant procurement records, including solicitation and specification documents, records evidencing public notice of solicitations, all bids and proposals received, records of communications with interested vendors, completed bid evaluation documents, documents supporting non-competitive purchases (including sole source findings, emergency purchase authorizations, and copies of cooperative or other public entity contracts that the Town purchases off of), full bid evaluation documents, intent to award notices, and final contracts. ToKI should create a dedicated file for each purchase that the Town makes which it should use to store all relevant records.</p>	1	2

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 3: The Town should adapt the Accounting Policies and Procedures guide into two separate governing documents, including one document of finance-related policies and a separate document of finance-related processes and procedures. Updates to the finance-related policies and procedures guide should require the approval of the Town Council, while the Finance Director should be able to update the finance-related processes and procedures guide with the approval of the Mayor and/or Town Administrator, or to conform with updates to South Carolina law, code, or governing accounting principles.</p>	1	2
<p>Recommendation 4: The Town should update its procedures to require that staff reviewing financial work performed by others utilize independently sourced reports and records to ensure that the reports are an accurate representation of the entries in the Town’s various financial software systems.</p>	3	1
<p>Recommendation 5a: The Town should begin conducting regular account audits of sensitive financial software platforms to identify and remove unauthorized accounts, ensure that all authorized accounts are active and accessible, and confirm that account permissions agree with the Town’s intended permissions control model. All accountholders should hold individual accounts (<i>i.e.</i>, account sharing should not be permitted) and accounts should be assigned to individual employees. The Town should require staff with accounts in the Town’s various sensitive financial systems to periodically log in to these accounts in order to maintain access and verify that the accounts are functioning properly.</p>	2	3

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 5b: The Town should implement a cybersecurity policy that requires staff to adhere to cybersecurity best practices, such as using complex passwords and refraining from storing passwords in unsecured locations. To support adoption of this cybersecurity initiative, the Town should consider providing staff with subscriptions to an enterprise-grade password manager.</p>	<p>1</p>	<p>1</p>
<p>Recommendation 6: The Town should modify its processes for handling checks, including both checks made out to ToKI and checks made out by ToKI, to ensure that the Town maintains a consistent chain of custody for all checks from the time that they arrive at Town Hall to the time that they are deposited (for checks made out to ToKI) or are received by their final recipient (for checks made out by ToKI). The Town may use its various software systems which it uses to track payments (such as CitizenServe and Incode’s court and utility billing modules) to track checks that are recorded immediately after receipt and should use a dedicated check tracking log to track checks that are not immediately recorded in one of the Town’s software systems after receipt.</p>	<p>2</p>	<p>1</p>
<p>Recommendation 7: The Town should review the implementation of the Town’s existing ethics policies and update the policies as appropriate and/or developing supporting ethics procedures/documentation that goes beyond merely stating the policies and instead explains the usage of the policies in detail. The Town may wish to provide periodic training on its ethics policies to Town employees above and beyond the ethics acknowledgement form that the Town requires staff to sign annually in order to help ensure that Town staff have consistent understanding of the expectations and demands placed on them by the Town’s ethics policies.</p>	<p>1</p>	<p>2</p>

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 8: The Finance Department should continue the process of implementing ACH payments for vendor payments. Once the Town has successfully implemented ACH payments for vendor payments, the Town should encourage vendors to transition to ACH payments and assist vendors through the transition process.</p> <p>Once the Town has introduced ACH payments, it will also need to update its vendor management procedures, including creation of a vendor management form that requires the vendor to identify financial and operational contacts, include a voided check and/or banking relationship confirmation, and should introduce processes that require independent verification of any requested changes to vendor information, such as banking information, primary contacts, or other information that may increase risk of fraudulent payments.</p>	<p>3</p>	<p>3</p>

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 9: The Town should update its Accounts Payable (“AP”) process to require management within departments making a purchase to complete a consistent receiving record form (or provide a packing slip, bill of lading, or other documentation of receipt) prior to Finance issuing payment on an invoice, or at least document on the invoice that all goods have been received. The Town should ensure that the department managers understand that their signature on a request for payment represents their attestation that all goods and/or services have been received in compliance with the terms of the contract/order.</p> <p>The Town should also consider introducing vendor performance forms, specifically for use in service contracts, or goods/materials contracts with multiple components or complex requirements. The vendor performance management forms should be several questions that allow the Town to evaluate vendor performance, with consideration for communication, timeliness, and whether the deliverable(s) met the terms of the contract or order. Vendor performance forms should be maintained as part of the contract file, and the Town may consider use of performance forms to determine whether a vendor would be recommended for future use by the Town, or if use of the contract’s cure and other remedies should be utilized to address documented performance concerns.</p>	2	1

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 10: The Town should review its processes for processing check request/reimbursement forms and determine whether there are payments that should be exempted from the requirement to attach supporting documents. If the Town decides that certain payments can be exempted from the supporting document requirement, the Town should specify the types of exemptions allowed and update the check request/reimbursement form to provide applicants with a space to provide a written justification for the lack of supporting documents. If the Town determines that no exemptions should be given to the supporting document requirement, the Town should re-emphasize the supporting document requirement and require Finance Department staff to reject all check request/reimbursement forms that are not accompanied by adequate supporting documents.</p>	1	1
<p>Recommendation 11: The Town should implement a policy and process for creating and updating vendor profiles that requires ToKI staff to verify all submitted information through a trusted, independent communications channel, such as having an in-person meeting or calling a trusted phone number. As certain alternate payment methods, such as ACH, may increase the damages of vendor impersonation fraud, the Town should ensure that it implements this policy or process before widely offering ACH payments to vendors and may wish to consider implementing stricter verification levels for vendors that make use of ACH payments. At a minimum, the Town should require staff to independently verify updates to vendor routing information through a trusted source before approving vendor profile changes.</p>	2	2

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 12: The Town should update its vendor management processes to require Finance Department staff to obtain signed and dated W-9s from all applicable vendors prior to issuing payment on invoices issued by those vendors. Additionally, the Town should begin conducting periodic vendor reviews to confirm that the W-9s that the Town has on file from active vendors are up to date by requesting new signed and dated W-9s from vendors whose W-9s on file are dated more than two years old or are undated.</p>	2	2
<p>Recommendation 13a: The Town should develop and formally adopt a written, comprehensive credit card policy. The Town’s comprehensive credit card policy should explicitly lay out what constitutes permissible credit card usage and what type of credit card usage is not allowed. Additionally, the policy should include clear disciplinary procedures for credit card misuse, including a progressive disciplinary policy that provides for increasing consequences for repeated credit card misuse, up to and including revocation of credit card access. The credit card policy should detail the one-time (e.g., repayment of a charge) and progressive disciplinary consequences of the specified credit card usage violations.</p>	1	2
<p>Recommendation 13b: The Town should develop a training program for cardholders, including training for new credit card holders, remedial training for cardholders that violate the Town’s credit card policy, and periodic retraining for all cardholders. As part of the training program, cardholders should be required to sign documents affirming that they understand the rules of the Town’s credit card program and agreeing to abide by the rules and any consequent discipline.</p>	2	3

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 14a: The Town should review the typical use patterns of cardholders to develop an understanding of each cardholder’s typical credit needs. The Town should then use the collected information on typical credit usage to adjust card limits based on anticipated card usage to ensure that credit limits match the need exhibited by each cardholder’s position. When modifying credit limits, the Town should balance cardholder needs and typical usage and the risk posed by cards having credit limits greatly in excess of standard card usage patterns.</p>	2	2
<p>Recommendation 14b: The Town should consider introducing the use of “ghost” cards (<i>i.e.</i>, virtual cards for dedicated virtual use cases) or create a new card dedicated for use for recurring subscriptions.</p>	3	3
<p>Recommendation 14c: The Town should introduce a process that allows cardholders to request one-time credit increases on their cards to allow for exceptional demands. The process should require the cardholder to list the intended use and provide a justification as to why this purchase cannot be completed using an alternate payment method.</p>	2	1
<p>Recommendation 15: As part of developing a new, written credit card policy, the Town should clearly identify which types of credit card purchases are exempt from receipt retention/submission requirements and develop a standardized method for identifying exempt payments in the monthly reconciliation. If Kiawah Island leadership determines that recurring payments should be exempt from standard credit card receipt retention/submission requirements, they should specify what alternate reporting requirements are imposed instead, such as requiring a receipt for at least one payment per year, or a statement/receipt that defines the total annual charge and is reviewed and validated, and how the alternate reporting requirements are to be tracked.</p>	2	1

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 16: The Town should develop and formally adopt procedures governing the selection of formal, competitive procurement methods. Additionally, the Town should develop guidance for the officials and staff tasked with selecting the formal, competitive procurement method for each purchase that they can use when making that selection. Among other relevant factors, the guidelines should consider the type of good or service being purchased and the expected purchase value.</p>	1	1
<p>Recommendation 17: The Town should develop robust debt management procedures prior to any future Town issuances of long-term debt. The Town’s debt management procedures should detail the responsibilities of Town management and Finance Department staff as they relate to the debt issuance (including strategic and financial planning), making debt service payments (including the use of sinking funds), and accounting for and reporting on debt.</p>	3	3
<p>Recommendation 18a: The Town should require charitable grant applicants to disclose any relationships that they have with Town staff and officials and sign a non-collusion pledge.</p>	2	1
<p>Recommendation 18b: In order to better assess the performance of new charitable grantees, the Town should introduce additional performance reporting requirements for first-year grant recipients, such as requiring grantees to provide a mid-year performance and expense report in their first year of receiving funds.</p>	2	2

Recommendation	Priority/Sense of Urgency: 1 = High 2 = Medium 3 = Low	Suggested Time for Implementation: 1 = <90 days 2 = 91-180 days 3 = >180 days
<p>Recommendation 19: The Town should redesign the SATAX grant application form to better account for multiple common types of applicants. The Town may wish to consider introducing multiple sections to the form for different types of applications, such as one section for short-term events and another section for long-term programs or ongoing efforts, and ask applicants to only complete the sections that apply to their particular application. After implementing the redesigned forms, the Town should strictly enforce requirements that applicants fully complete all applicable sections of the application in order to be considered for funding.</p>	<p>3</p>	<p>3</p>

Management Response

Management Response

Mauldin and Jenkins, LLC has completed a comprehensive Finance Department Operational and Performance Assessment for the Town of Kiawah . The Town values this independent review as an important means of strengthening internal controls, enhancing transparency, and supporting sound stewardship of public resources.

Town staff have carefully considered each recommendation. In many cases, the Town agrees and is either already taking steps or will be initiating actions to address the suggested improvements. In other instances, the Town respectfully disagrees, based on existing controls and practices that it believes already meet the underlying objectives of the recommendations.

The following sections provide the Town’s responses to each recommendation, outlining current practices, planned enhancements, and, where applicable, the rationale for maintaining existing procedures.

RECOMMENDATION 1

The Town should determine whether it will allow cardholders to lend their physical card to other Town staff for presentation at local vendors. If the Town does decide to allow cardholders to lend their card to other Kiawah Island officials or staff, the Town should introduce a process that requires cardholders to document card lending, including requiring borrowers to identify their intended purchase before borrowing the card and sign the cards out/in when they borrow/return the card. The updated credit card policy and/or process should clarify who carries liability for purchases made with borrowed cards, including how misuse of borrowed cards interacts with any standardized disciplinary process established by the credit card policy.

Response

The Town issues credit cards to a limited number of authorized users—currently including the Mayor, Mayor Pro Tempore, and five designated employees—for approved Town-related expenditures, such as:

- Travel expenses
- Subscriptions and professional memberships
- Purchases of supplies, materials, and small equipment
- Emergency operational purchases

These cards may be lent to other employees, only when necessary, to facilitate approved Town business.

The Town’s established practice requires that any borrower identify the intended purchase prior to using a card. This practice will continue. However, the Town agrees with the recommendation

to formally update the written credit card policy, which will be included in the new Finance Procedures Manual, to document this procedure and strengthen accountability.

The updated procedures will clearly define:

- Cardholder responsibilities for safeguarding the card
- The requirement to ensure all charges comply with authorized and intended uses
- The obligation to return the card promptly with complete supporting documentation
- Specific consequences for improper or unauthorized use

Additionally, the Town will include disciplinary provisions for violations such as repeated failure to submit required receipts or other forms of misuse. Consequences may include requiring employees to reimburse the Town for any unauthorized charges.

The updated credit card section of the new Finance Procedures Manual will be finalized and adopted by the end of the current fiscal year. Once approved, it will be communicated to all staff, and all employees will be required to acknowledge their understanding of the procedures and responsibilities outlined in the Finance Procedures Manual.

RECOMMENDATION 2

The Town should refine its policies and procedures related to the creation, collection, and retention of documentation related to Town procurement activity. The revised procurement document management policies and procedures should require Town staff to prepare, collect, and retain all relevant procurement records, including solicitation and specification documents, records evidencing public notice of solicitations, all bids and proposals received, records of communications with interested vendors, completed bid evaluation documents, documents supporting non-competitive purchases (including sole source findings, emergency purchase authorizations, and copies of cooperative or other public entity contracts that the Town purchases off of), full bid evaluation documents, intent to award notices, and final contracts. ToKI should create a dedicated file for each purchase that the Town makes which it should use to store all relevant records.

Response

The Town adopted a new procurement ordinance in spring 2025, which has resulted in updated policies and procedures and reflects the Town's continued efforts to strengthen compliance with procurement standards.

The Town recognizes that further education and training among staff will enhance the consistency and quality of procurement documentation. As part of the Town's ongoing commitment to transparency and accountability, the Finance Department will work with department heads to ensure that all procurement-related activities are properly documented and filed in accordance with policy.

The Town agrees with the recommendation and will also refine its internal procedures to:

- Ensure that a dedicated file or binder is created for each procurement action
- Clearly identify required documentation for each stage of the process
- Reinforce staff understanding of documentation and retention standards

The updated procurement section of the new Finance Procedures Manual will be finalized and adopted by the end of the current fiscal year.

RECOMMENDATION 3

The Town should adapt the Accounting Policies and Procedures guide into two separate governing documents, including one document of finance-related policies and a separate document of finance-related processes and procedures. Updates to the finance-related policies and procedures guide should require the approval of the Town Council, while the Finance Director should be able to update the finance-related processes and procedures guide with the approval of the Mayor and/or Town Administrator, or to conform with updates to South Carolina law, code, or governing accounting principles.

Response

The Town agrees with this recommendation. The Finance Department is developing a Finance Procedures Manual to provide greater clarity, consistency, and accountability in financial operations.

This manual will define the roles and duties of finance staff and provide a foundation for staff training and continuity of operations. As part of this effort, the Town will distinguish between higher-level policy direction, which will be subject to Town Council approval, and detailed administrative procedures, which may be updated by staff to reflect changes in law, regulations, or best practices.

The Town staff anticipates completing the drafting of this manual by the end of the current fiscal year.

RECOMMENDATION 4

The Town should update its procedures to require that staff reviewing financial work performed by others utilize independently sourced reports and records to ensure that the reports are an accurate representation of the entries in the Town's various financial software systems.

Response

The Town's current procedures require that all financial documents reviewed and approved by the Town Administrator or Finance Director be generated directly in PDF format from the Town's financial systems, ensuring that the files cannot be altered or manipulated after creation. This practice helps ensure the integrity and accuracy of the information being reviewed.

The Town agrees that these procedures could be documented and clarified more explicitly in the Finance Procedures Manual. The Manual will further describe the use of system-generated reports and related controls to support independent verification of financial information. The Town staff expects to complete this Manual by the end of the current fiscal year.

The only exception is the CSV file transmitted to Wells Fargo, which is required by the bank's electronic processing system. Prior to the creation and transmission of the CSV file, the Finance Director reviews and verifies the corresponding PDF printout, confirming that the totals and the number of checks are accurate and consistent.

RECOMMENDATION 5a

The Town should begin conducting regular account audits of sensitive financial software platforms to identify and remove unauthorized accounts, ensure that all authorized accounts are active and accessible, and confirm that account permissions agree with the Town's intended permissions control model. All accountholders should hold individual accounts (i.e., account sharing should not be permitted) and accounts should be assigned to individual employees. The Town should require staff with accounts in the Town's various sensitive financial systems to periodically log in to these accounts in order to maintain access and verify that the accounts are functioning properly.

Response

The Town agrees with this recommendation and will make the necessary changes.

These practices will be incorporated into the Finance Procedures Manual by the end of the current fiscal year and coordinated with the Town's IT and cybersecurity efforts.

RECOMMENDATION 5b

The Town should implement a cybersecurity policy that requires staff to adhere to cybersecurity best practices, such as using complex passwords and refraining from storing passwords in unsecured locations. To support adoption of this cybersecurity initiative, the Town should consider providing staff with subscriptions to an enterprise-grade password manager.

Response

The Town agrees with this recommendation. The Town currently conducts cybersecurity exercises periodically but does not have a formal written cybersecurity policy.

The Operations Manager will work with IMS Solutions to develop a comprehensive cybersecurity policy outlining best practices, password management standards, and user responsibilities. This policy will be completed by the end of the current fiscal year.

RECOMMENDATION 6

The Town should modify its processes for handling checks, including both checks made out to ToKI and checks made out by ToKI, to ensure that the Town maintains a consistent chain of custody for all checks from the time that they arrive at Town Hall to the time that they are deposited (for checks made out to ToKI) or are received by their final recipient (for checks made out by ToKI). The Town may use its various software systems which it uses to track payments (such as CitizenServe and Incode's court and utility billing modules) to track checks that are recorded immediately after receipt and should use a dedicated check tracking log to track checks that are not immediately recorded in one of the Town's software systems after receipt.

Response

The Town disagrees with this recommendation, as it believes its current procedures already provide a clear, consistent, and well-documented chain of custody for all checks, both those received by the Town and those issued by the Town.

For incoming checks, the Town maintains strong controls and daily documentation. All checks are recorded in a dedicated check logbook by the Finance Assistant or, in her absence, by another Finance Department member. This log provides a continuous record of all checks received, including the date, amount, and individual responsible for handling the check.

Even during emergencies, such as recent flooding events when Town offices were closed, a designated employee was present at Town Hall daily to collect mail and secure any incoming checks for deposit. The staff member receiving and depositing the checks signs the check log to document the transfer of custody and completes deposits either through the desktop check scanner or by visiting Wells Fargo directly.

For outgoing checks, the majority are mailed directly by Wells Fargo, the Town's contracted check issuer. A small number of checks are returned to Town Hall when additional documentation must be included; these are mailed out by staff. As part of the monthly bank reconciliation process, the Town reviews all outstanding checks. Vendors with checks

outstanding for more than 30 days are contacted promptly to verify receipt and resolve any issues.

Based on these robust procedures, the Town believes it already maintains a reliable and consistent chain of custody for all checks and demonstrates strong internal control over both incoming and outgoing payments. Accordingly, the Town does not find additional modifications necessary at this time.

RECOMMENDATION 7

The Town should review the implementation of the Town's existing ethics policies and update the policies as appropriate and/or developing supporting ethics procedures/ documentation that goes beyond merely stating the policies and instead explains the usage of the policies in detail. The Town may wish to provide periodic training on its ethics policies to the Town employees above and beyond the ethics acknowledgment form that the Town requires staff to sign annually in order to help ensure that Town staff have consistent understanding of the expectations and demands placed on them by the Town's ethics policies.

Response

The Town agrees with this recommendation. In conjunction with the annual Employee Handbook acknowledgment process and as part of its ongoing policy review, the Town will periodically evaluate the implementation of its ethics-related policies to ensure that operational practices are consistent with the policies as adopted. Where gaps between policy and practice are identified, the Town will develop and implement additional procedures and supporting documentation to clarify expectations and ensure compliance, thereby reinforcing a culture of ethical conduct and accountability.

The Town's ethical standards are currently established in the Employee Handbook, including the Ethical Conduct and Conflict of Interest provisions, and are further supported by a stand-alone Gift Policy that defines acceptable conduct and related reporting obligations.

To further promote awareness and compliance, the Town will require all employees to annually acknowledge receipt of the Employee Handbook. This annual acknowledgment will help ensure that employees remain informed of ethical expectations, conflict-of-interest requirements, and reporting procedures, thereby supporting transparency and strengthening the Town's overall ethics framework.

RECOMMENDATION 8

The Finance Department should continue the process of implementing ACH payments for vendor payments. Once the Town has successfully implemented ACH payments for vendor payments, the Town should encourage vendors to transition to ACH payments and assist vendors through the transition process. Once the Town has introduced ACH payments, it will also need to update its vendor management procedures, including creation of a vendor management form that requires the vendor to identify financial and operational contacts, include a voided check and/or banking relationship confirmation, and should introduce processes that require independent verification of any requested changes to vendor information, such as banking information, primary contacts, or other information that may increase risk of fraudulent payments.

Response

The Town agrees with this recommendation and is currently in the process of implementing ACH payments for vendor disbursements using a measured approach. The primary challenge has been collecting verified email addresses from vendors, which is required by Wells Fargo as the first step in establishing ACH payment capability.

To address this, the Town plans to send notices to all vendors in conjunction with the distribution of Form 1099, inviting them to participate in the ACH payment program and providing instructions on how to securely submit their email and banking information for verification.

The Town acknowledges that it will not fully implement ACH payments until a majority of vendors have transitioned to the new system, as it is not practical to manage both paper check and ACH payment processes simultaneously. The goal is to achieve full implementation by the end of calendar year 2026.

Once a sufficient number of vendors are enrolled, the Town will proceed with full ACH implementation and update its vendor management procedures to include enhanced verification controls, documentation standards, and fraud-prevention measures, including the use of a vendor management form.

RECOMMENDATION 9

The Town should update its Accounts Payable (“AP”) process to require management within departments making a purchase to complete a consistent receiving record form prior to Finance issuing payment on an invoice, or at least document on the invoice that all goods have been received. The Town should ensure that the department managers understand that their signature represents their attestation that all goods and/or services have been received in compliance with the terms of the contract/order.

The Town should also consider introducing vendor performance forms, specifically for use in service contracts, or goods/materials contracts with multiple components or complex requirements. The vendor performance management forms should be several questions that allow the Town to evaluate vendor performance, with consideration for communication, timeliness, and whether the deliverable(s) met the terms of contract or order. Vendor performance forms should be maintained as part of the contract file, and the Town may consider use of performance forms to determine whether a vendor would be recommended for future use by the Town, or if use of the contractor's cure and other remedies should be utilized to address documented performance concerns.

Response

The Town agrees with this recommendation and will communicate and educate all check requestors and department heads on their responsibility to verify receipt of goods and services before payment is processed. The Finance Department will reinforce that approval signatures represent confirmation that all items have been received as ordered and that all services have been satisfactorily rendered in accordance with the terms of the contract or purchase order.

To strengthen internal controls, the Town will update its Accounts Payable process to require departments making purchases to provide a consistent receiving record form, or alternatively a packing slip, bill of lading, or other documentation demonstrating receipt. At a minimum, departments will be required to note on the invoice that all goods and/or services have been received prior to the Finance Department processing payment.

In addition, the Town will evaluate the introduction of vendor performance forms for major contracts, such as landscaping, waste management, and other high-value or complex service agreements. These forms would include a standardized set of questions addressing communication, timeliness, quality of deliverables, and compliance with contract terms. Completed performance evaluations would be maintained in the contract file and may be used to inform future vendor selection decisions or to support the use of contractual remedies when performance issues are documented.

The Town staff expects to complete the above actions by the end of the current fiscal year.

RECOMMENDATION 10

The Town should review its processes for processing check request/reimbursement forms and determine whether there are payments that should be exempted from the requirement to attach supporting documents. If the Town decides that certain payments can be exempted from the supporting document requirement, the Town should specify the types of exemptions allowed and update the check request/reimbursement form to provide applicants with a space to provide a written justification for the lack of supporting documents. If the Town determines that no exemptions should be given to the supporting document requirement, the Town should re-emphasize the supporting document requirement and require Finance Department staff to reject

all check request/reimbursement forms that are not accompanied by adequate supporting documents.

Response

Currently, the only check requests that are not required to include supporting documentation are those related to:

- A cell phone stipend for one employee
- Arts Council events
- Bird banding interns
- Occasionally, membership dues for professional organizations

However, the Town agrees with the recommendation that all check requests should include appropriate supporting documentation. The Finance Department will review and update internal procedures by the end of the current fiscal year to ensure this requirement is applied consistently.

The Town will also communicate and educate all employees on the updated policy and reinforce that no check request or reimbursement will be processed without complete supporting documentation.

RECOMMENDATION 11

The Town should implement a policy and process for creating and updating vendor profiles that requires ToKI staff to verify all submitted information through a trusted, independent communications channel, such as having an in-person meeting or calling a trusted phone number. As certain alternate payment methods, such as ACH, may increase the damages of vendor impersonation fraud, the Town should ensure that it implements this policy or process before widely offering ACH payments to vendors and may wish to consider implementing stricter verification levels for vendors that make use of ACH payments. At a minimum, the Town should require staff to independently verify updates to vendor routing information through a trusted source before approving vendor profile changes.

Response

The Town agrees with this recommendation. Protecting the integrity of the vendor onboarding and update process is essential to reducing the risk of vendor impersonation fraud, especially as the Town expands the use of ACH payments.

The Town will develop and implement a formal policy and procedure requiring independent verification of all new vendor profiles and any subsequent changes to vendor information, including banking details. This verification will occur through a trusted communication channel, such as a phone call to a previously validated number or an in-person meeting and will not rely on information provided solely in the update request itself. Staff will document the verification

process as part of the vendor file to ensure accountability and auditability. This policy will be memorialized in the Finance Procedures Manual by the end of the current fiscal year, and implementation will include staff training.

As part of the upcoming implementation of ACH payments, the Town will initially rely on Wells Fargo's verification processes to confirm the validity of vendor banking information. Wells Fargo requires independent verification of vendor details, which will further strengthen the Town's controls against fraudulent changes to payment information.

RECOMMENDATION 12

The Town should update its vendor management processes to require Finance Department staff to obtain signed and dated W-9s from all applicable vendors prior to issuing payment on invoices issued by those vendors. Additionally, the Town should begin conducting periodic vendor reviews to confirm that the W-9s that the Town has on file from active vendors are up to date by requesting new signed and dated W-9s from vendors whose W-9s on file are dated more than two years old or are undated.

Response

The Town agrees with this recommendation and will make every effort to ensure that W-9 forms are kept current for all vendors.

As part of this effort, the Town will incorporate a W-9 review step into the annual 1099 issuance process to confirm that all vendor records are up to date and to request updated W-9s as needed.

RECOMMENDATION 13a

The Town should develop and formally adopt a written, comprehensive credit card policy. The Town's comprehensive credit card policy should explicitly lay out what constitutes permissible credit card usage and what type of credit card usage is not allowed. Additionally, the policy should include clear disciplinary procedures for credit card misuse, including a progressive disciplinary policy that provides for increasing consequences for repeated credit card misuse, up to and including revocation of credit card access. The credit card policy should detail the one-time (e.g., repayment of a charge) and progressive disciplinary consequences of the specified credit card usage violations.

Response

The Town agrees with this recommendation and has addressed it in its response to Recommendation 1, which describes the development of updated written credit card policies and procedures, including defined responsibilities and consequences for misuse.

RECOMMENDATION 13b

The Town should develop a training program for cardholders, including training for new credit card holders, remedial training for cardholders that violate the Town's credit card policy, and periodic retraining for all cardholders. As part of the training program, cardholders should be required to sign documents affirming that they understand the rules of the Town's credit card program and agreeing to abide by the rules and any consequent discipline.

Response

The Town does not currently believe a periodic credit card training program is necessary. However, once the policy updates referenced in Recommendation 1 are finalized, Town staff will be educated on the new controls and procedures related to credit card use.

In addition, all new cardholders will receive a briefing on the Town's credit card policy before being issued a card, ensuring that they understand the responsibilities, authorized uses, and disciplinary measures associated with the program.

This approach will ensure consistent understanding and compliance without the need for a separate formal periodic training program.

RECOMMENDATION 14a

The Town should review the typical use patterns of cardholders to develop an understanding of each cardholder's typical credit needs. The Town should then use the collected information on typical credit usage to adjust card limits based on anticipated card usage to ensure that credit limits match the need exhibited by each cardholder's position. When modifying credit limits, the Town should balance cardholder needs and typical usage and the risk posed by cards having credit limits greatly in excess of standard card usage patterns.

Response

The Town believes that the current credit card limits are sufficient and appropriate for existing operational needs and therefore disagrees with the recommendation. Two cards currently carry higher limits of \$50,000 and \$36,000 for the Mayor and Mayor Pro Tempore, respectively, which are maintained for emergency purposes to ensure flexibility in urgent or unforeseen circumstances.

However, the Town is considering a modification to increase the credit limit on the Town Administrator's card to better accommodate recurring expenses such as monthly subscriptions, conference registrations, and membership fees.

RECOMMENDATION 14b

The Town should consider introducing the use of "ghost" cards (i.e., virtual cards for dedicated virtual use cases) or create a new card dedicated for use for recurring subscriptions.

Response

The Town disagrees with this recommendation. Currently, the Town does not believe that introducing virtual "ghost" cards or creating an additional dedicated subscription card is necessary. Existing credit card management practices, combined with planned adjustments such as the potential increase to the Town Administrator's card limit, are sufficient to meet operational needs and effectively manage recurring expenses.

The Town will continue to monitor its credit card usage and operational requirements and will reassess the need for such tools should circumstances change in the future.

RECOMMENDATION 14c

The Town should introduce a process that allows cardholders to request one-time credit increases on their cards to allow for exceptional demands. The process should require the cardholder to list the intended use and provide a justification as to why this purchase cannot be completed using an alternate payment method.

Response

The Town does not agree with this recommendation due to security and risk management considerations. Allowing one-time credit limit increases could increase exposure to potential misuse or unauthorized transactions. The Town believes that maintaining stable card limits, coupled with existing oversight and the availability of alternative payment methods, provides a more secure and controlled approach to managing credit card usage.

RECOMMENDATION 15

As part of developing a new, written credit card policy, the Town should clearly identify which types of credit card purchases are exempt from receipt retention/submission requirements and develop a standardized method for identifying exempt payments in the monthly reconciliation. If

Kiawah Island leadership determines that recurring payments should be exempt from standard credit card receipt retention/submission requirements, they should specify what alternate reporting requirements are imposed instead, such as requiring a receipt for at least one payment per year, or a statement/receipt that defines the total annual charge and is reviewed and validated, and how the alternate reporting requirements are to be tracked.

Response

The Town agrees with this recommendation and has addressed it in its response to Recommendation 1, which notes that the updated credit card policy will define responsibilities, documentation expectations, and consequences for non-compliance, including standards for receipt retention and any limited exemptions.

RECOMMENDATION 16

The Town should develop and formally adopt procedures governing the selection of formal, competitive procurement methods. Additionally, the Town should develop guidance for the officials and staff tasked with selecting the formal, competitive procurement method for each purchase that they can use when making that selection. Among other relevant factors, the guidelines should consider the type of good or service being purchased and the expected purchase value.

Response

The Town agrees with this recommendation. As noted previously, the Town updated its procurement ordinance in spring 2025. The revised ordinance includes clear thresholds and procedural requirements for determining when to use formal, competitive procurement methods such as sealed bids, requests for proposals (RFPs), and requests for qualifications (RFQs).

To further strengthen this process, the Town will endeavor to educate staff and provide additional guidance outlining step-by-step criteria for selecting the appropriate procurement method by the end of the current fiscal year. This effort will enhance staff understanding of, and compliance with, the Town's procurement policy.

RECOMMENDATION 17

The Town should develop robust debt management procedures prior to any future Town issuances of long-term debt. The Town's debt management procedures should detail the responsibilities of Town management and Finance Department staff as they relate to the debt issuance (including strategic and financial planning), making debt service payments (including the use of sinking funds), and accounting for and reporting on debt.

Response

The Town does not currently have a formal, stand-alone debt management policy but maintains a debt-related chapter within its Accounting Manual.

The Town rarely issues debt and, at present, has limited need for a comprehensive debt management framework. However, Finance Department staff are knowledgeable in debt issuance, payment processing, accounting, and reporting requirements.

If the Town anticipates issuing long-term debt in the future, the Finance Department will develop and formalize detailed debt management procedures to ensure continued compliance with applicable regulations and alignment with best financial practices.

RECOMMENDATION 18a

The Town should require charitable grant applicants to disclose any relationships that they have with Town staff and officials and sign a non-collusion pledge.

Response

The Town agrees with this recommendation and will incorporate a non-collusion pledge into the charitable grant application process. Applicants will be required to disclose any relationships with Town staff and officials as part of this enhanced transparency and accountability measure.

RECOMMENDATION 18b

In order to better assess the performance of new charitable grantees, the Town should introduce additional performance reporting requirements for first-year grant recipients, such as requiring grantees to provide a mid-year performance and expense report in their first year of receiving funds.

Response

The Town agrees with this recommendation. The Town will introduce enhanced reporting requirements for new charitable grant recipients, including the submission of a mid-year performance and expense report during their initial year of funding. This will help the Town better assess program effectiveness and ensure that grant funds are used as intended.

RECOMMENDATION 19

The Town should redesign the SATAX grant application form to better account for multiple common types of applicants. The Town may wish to consider introducing multiple sections to the form for different types of applications, such as one section for short-term events and another section for long-term programs or ongoing efforts, and ask applicants to only complete the sections that apply to their particular application. After implementing the redesigned forms, the Town should strictly enforce requirements that applicants fully complete all applicable sections of the application in order to be considered for funding.

Response

The Town agrees to evaluate the SATAX grant application form by the end of the 3rd quarter, not only to distinguish between different types of applicants and projects, but also to improve the overall clarity, consistency, and completeness of information provided by applicants. Any revisions will be designed to support more effective evaluation of applications and to ensure that all required information is provided for funding consideration.



TAB 3

TOWN COUNCIL

Agenda Item

TOWN OF KIAWAH ISLAND

ORDINANCE 2025-15

AN ORDINANCE TO AMEND THE NOISE STANDARDS WITHIN THE TOWN OF KIAWAH ISLAND AND TO REPEAL CHAPTER 8, SECTIONS 15-801 THROUGH 15-807 OF THE TOWN MUNICIPAL CODE

WHEREAS, the Town Council of the Town of Kiawah Island is charged with preserving the public peace and ensuring the health, safety, and general welfare of its residents and visitors; and

WHEREAS, the Town has determined that excessive, unnecessary, or unregulated noise can adversely impact the quality of life, disturb the peaceful enjoyment of property, interfere with the use of environmentally sensitive areas, and diminish the overall character of the community; and

WHEREAS, the Town Council finds it necessary and appropriate to adopt clear, enforceable, and balanced standards for permissible sound levels and noise-generating activities within the Town’s jurisdiction, including residential, commercial, resort, and public areas; and

WHEREAS, the Town Council further finds that Chapter 8, Sections 15-801 through 15-807 of the Town Code, enacted by Ordinance No. 2022-01, should be repealed and replaced with revised provisions that provide enhanced clarity, improve enforceability, and better reflect the Town’s commitment to protecting public peace, health, and welfare.

NOW, THEREFORE, BE IT ORDERED AND ORDAINED BY THE COUNCIL OF THE TOWN OF KIAWAH ISLAND, SOUTH CAROLINA, AND IT IS ORDAINED BY THE AUTHORITY OF SAID COUNCIL:

Section 1 Purpose

The purpose of this Ordinance is to promote the public peace, health, safety, and welfare of the residents and visitors of the Town of Kiawah Island by establishing clear and enforceable standards regulating noise. These standards are intended to prevent excessive, unnecessary, and disruptive sounds; preserve the quiet character of residential and environmentally sensitive areas; and provide appropriate guidance for permissible noise levels in commercial, resort, and public spaces.

Section 2 Ordinance

The Town of Kiawah Island hereby repeals Chapter 8, Sections 15-801 through 15-807 of the Town Code, as enacted by Ordinance No. 2022-01, and adopts the following provisions in **“Exhibit A”** as the new Chapter 8 – Prohibited Noise of the Code of Ordinances. These provisions shall be codified and enforced accordingly.

Section 3 **Severability**

If any part of this Ordinance is held to be unconstitutional, it shall be construed to have been the legislative intent to pass said Ordinance without such unconstitutional provision, and the remainder of said Ordinance shall be deemed to be valid as if such portion had not been included. If said Ordinance, or any provisions thereof, is held to be inapplicable to any person, group of persons, property, kind property, circumstances or set of circumstances, such holding shall not affect the circumstances or set of circumstances, such holding shall not affect the applicability thereof to any other persons, property, or circumstances.

Section 4 **Effective Date and Duration**

This Ordinance shall be effective upon its enactment by the Town Council of the Town of Kiawah Island.

PASSED, APPROVED, AND ADOPTED BY THE COUNCIL FOR THE TOWN OF KIAWAH ISLAND ON THIS 6TH DAY OF JANUARY 2026.

Bradley D. Belt, Mayor

ATTEST:

By: _____
Petra Reynolds, Town Clerk

1st Reading: December 2, 2025

2nd Reading: January 6, 2026.

CHAPTER 8. – NOISE CONTROL AND ABATEMENT

Sec. 15-801. – Purpose.

The purpose of this Chapter is to promote the public peace, health, safety, and welfare of the residents and visitors of the Town of Kiawah Island by establishing clear and enforceable standards regulating noise. These standards are intended to prevent excessive, unnecessary, and disruptive sounds, preserve the quiet character of residential and environmentally sensitive areas, and provide appropriate guidance for permissible noise levels in commercial, resort, and public spaces. Activities that violate this Chapter will constitute a public nuisance and are subject to enforcement in accordance with the Town’s Code of Ordinances and applicable law.

Sec. 15-802. – Definitions.

For purposes of this Chapter, the following terms shall have the meanings set forth below:

- (a) *Commercial and Resort Area* means any area primarily comprised of commercial or Resort buildings or facilities.
- (b) *Construction Activity* means any physical work related to building, constructing, altering, repairing, renovating, or demolishing structures, including site preparation, excavation, and utility installation.
- (c) *Commercial Landscaping Activity* means any outdoor maintenance, lawn care, or grounds keeping services performed by commercial entities or contractors, including the operation of any powered equipment for the care, maintenance, or improvement of outdoor property.
- (d) *Daytime Hours* means the period between 7:00 a.m. and 9:00 p.m. for Residential Areas, and 7:00 a.m. and 10:00 p.m. for Commercial and Resort Areas.
- (e) *Nighttime Hours* means the period between 9:00 p.m. and 7:00 a.m. for Residential Areas, and 10:00 p.m. and 7:00 a.m. for Commercial and Resort Areas.
- (f) *Residential Area* means any area primarily comprised of residential dwelling units, including areas occupied by Short-Term Rentals.
- (g) *Short-Term Rental* means a dwelling unit that is rented, leased, or otherwise assigned for occupancy or use by the public for a period of less than thirty (30) consecutive days.
- (h) *Sound Level Meter* means a device that meets standards established by the American National Standards Institute (ANSI) for measuring sound in decibels.
- (i) *Golf Course Maintenance* means the operation of equipment or tools used for regular turf care, landscaping, irrigation, or other routine upkeep of golf course grounds and facilities.
- (j) *Town-recognized Holiday* means any holiday officially recognized and published by the Town of Kiawah Island.
- (k) *Town Officials* means Code Enforcement Officers, Community Service Officers, Building Official, and other designated employees or agents of the Town authorized to enforce this Chapter.

Sec. 15-803. – General Prohibition.

No person shall make, cause, or permit any unreasonably loud, disturbing, or unnecessary noise that disrupts the peace, quiet, or comfort of any person within the Town, or that exceeds the maximum permissible sound levels established in Section 15-804.

Sec. 15-804. – Sound Limits and Activity Regulations.

(a) The following maximum sound levels shall apply. Sound shall be measured at a distance of ten (10) feet from the property line of the parcel where the sound originates or, where appropriate and practical, at a distance of fifty (50) feet from the noise source. The Town Official shall determine the measurement location based on site conditions and public accessibility.

(1) Residential Areas:

- a. Daytime Hours: 70 dBA
- b. Nighttime Hours: 60 dBA

(2) Commercial and Resort Areas:

- a. Daytime Hours: 75 dBA
- b. Nighttime Hours: 60 dBA

(b) Construction Activity shall not exceed 80 dBA. If the Town determines that construction activity exceeds 80 dBA, the Contractor shall reduce noise levels or obtain authorization from the Town to continue such activity for a specified duration.

(c) Commercial Landscaping Activity shall not exceed 80 dBA.

(d) All sound levels shall be measured by a Town Official using a properly calibrated Sound Level Meter.

Sec. 15-805. – Specific Prohibited Activities.

The following activities are deemed to be public nuisances and are prohibited under this Chapter:

(a) Operating two-cycle engine leaf blowers. This prohibition shall take effect twelve (12) months following the effective date of this Ordinance.

(b) Operating amplified music, radios, televisions, speakers, musical instruments, or similar devices in a manner that is plainly audible inside any other residence or business not associated with the sound source, unless permitted by the Town.

(c) Allowing an animal to make continuous or repetitive noise for more than ten (10) consecutive minutes that is plainly audible at or beyond the property line of the parcel where the animal is kept.

(d) Generating excessive noise from events, parties, or gatherings at Short-Term Rentals or other properties, where such noise disrupts adjacent or nearby properties, unless the event is approved or permitted by the Town through the Town's Special Event Application process.

(e) Operating a motor vehicle that emits sound in violation of Section 56-5-5020 of the South Carolina Code of Laws.

(f) Operating Construction Activity, Commercial Landscaping Activity, or Golf Course Maintenance during the following prohibited hours, regardless of sound level, unless prior written approval is obtained:

- (1) Construction Activity:
 - a. Between 7:00 p.m. and 7:00 a.m., Monday through Friday
 - b. Between 5:00 p.m. and 8:00 a.m., Saturday
 - c. At any time on Sundays and Town-Recognized Holidays
- (2) Commercial Landscaping Activity:
 - a. Between 6:00 p.m. and 8:00 a.m., Monday through Saturday
 - b. At any time on Sundays and Town-Recognized Holidays
- (3) Golf Course Maintenance:
 - a. Between 7:00 p.m. and 6:30 a.m., Monday through Saturday
- (4) Kiawah Island Community Association Activity on major arterial roads (Kiawah Island Parkway, Governor's Drive, and Ocean Course Drive) only:
 - a. Between 7:00 p.m. and 6:30 a.m., Monday through Saturday
 - b. At any time on Sundays and Town-Recognized Holidays

Construction Activity, Commercial Landscaping Activity, or Golf Course Maintenance occurring during the prohibited hours listed above, or exceeding the applicable sound limits established in Section 15-804, shall require prior written approval by the Town. Such approval shall only be granted in emergencies or for critical infrastructure work where no reasonable alternative schedule exists. Approvals shall be limited in scope and duration and shall specify the permitted hours of activity.

Sec. 15-806. – Exemptions.

The provisions of this Chapter shall not apply to:

- (a) Emergency vehicles and emergency work, including post-storm cleanup, debris removal, and restoration activities following hurricanes, tropical storms, or other significant weather events
- (b) Municipal or utility work performed for public safety
- (c) Town-approved community or special events, including those defined in Section 12-106(3) of the Town's Code of Ordinances
- (d) Beach or wildlife management activities conducted by the Town or its authorized agents
- (e) Other activities authorized by the Town

Sec. 15-807. – Enforcement.

This Chapter shall be enforced by the Town of Kiawah Island Code Enforcement Officers.

Town Officials are authorized to take enforcement action in response to violations of this Chapter, including, but not limited to, issuing verbal warnings, written citations, stop-work orders, or initiating penalties as provided in Section 15-808.

Property owners, property managers, contractors, and commercial operators are responsible for ensuring that their guests, tenants, employees, and invitees comply with this Chapter and

may be held jointly or individually liable for violations occurring on, or arising from, their property or operations.

Sec. 15-808. – Penalties.

Violations of this Chapter shall be subject to the following penalties:

(a) For a first offense, the violator may receive a written warning or be assessed a civil fine not to exceed one hundred dollars (\$100).

(b) For a second offense within any twelve (12) month period, the violator shall be assessed a civil fine not to exceed two hundred fifty dollars (\$250).

(c) For a third or subsequent offense within the same twelve (12) month period, the violator shall be assessed a civil fine not to exceed five hundred dollars (\$500).

In addition to the fines above, the Town may revoke any applicable short-term rental license in accordance with Section 14-509 of the Town's Code of Ordinances, or revoke or suspend a business license pursuant to the procedures set forth in Section 4-315 of the Town's Code of Ordinances. The Town may also issue stop-work orders or pursue other enforcement remedies as authorized by law.

Each day that a violation continues shall constitute a separate offense.

CHAPTER 8. – NOISE CONTROL AND ABATEMENT

Sec. 15-801. – Purpose.

The purpose of this Chapter is to promote the public peace, health, safety, and welfare of the residents and visitors of the Town of Kiawah Island by establishing clear and enforceable standards regulating noise. These standards are intended to prevent excessive, unnecessary, and disruptive sounds, preserve the quiet character of residential and environmentally sensitive areas, and provide appropriate guidance for permissible noise levels in commercial, resort, and public spaces. Activities that violate this Chapter will constitute a public nuisance and are subject to enforcement in accordance with the Town's Code of Ordinances and applicable law.

Sec. 15-802. – Definitions.

For purposes of this Chapter, the following terms shall have the meanings set forth below:

(a) *Commercial and Resort Area* means any area primarily comprised of commercial or Resort buildings or facilities.

(b) *Construction Activity* means any physical work related to building, constructing, altering, repairing, renovating, or demolishing structures, including site preparation, excavation, and utility installation.

(c) *Commercial Landscaping Activity* means any outdoor maintenance, lawn care, or grounds keeping services performed by commercial entities or contractors, including the operation of any powered equipment for the care, maintenance, or improvement of outdoor property.

(d) *Daytime Hours* means the period between 7:00 a.m. and 9:00 p.m. for Residential Areas, and 7:00 a.m. and 10:00 p.m. for Commercial and Resort Areas.

(e) *Nighttime Hours* means the period between 9:00 p.m. and 7:00 a.m. for Residential Areas, and 10:00 p.m. and 7:00 a.m. for Commercial and Resort Areas.

(f) *Residential Area* means any area primarily comprised of residential dwelling units, including areas occupied by Short-Term Rentals.

(g) *Short-Term Rental* means a dwelling unit that is rented, leased, or otherwise assigned for occupancy or use by the public for a period of less than thirty (30) consecutive days.

(h) *Sound Level Meter* means a device that meets standards established by the American National Standards Institute (ANSI) for measuring sound in decibels.

(i) *Golf Course Maintenance* means the operation of equipment or tools used for regular turf care, landscaping, irrigation, or other routine upkeep of golf course grounds and facilities.

(j) *Town-recognized Holiday* means any holiday officially recognized and published by the Town of Kiawah Island.

(k) *Town Officials* means Code Enforcement Officers, Community Service Officers, Building Official, and other designated employees or agents of the Town authorized to enforce this Chapter.

Sec. 15-803. – General Prohibition.

No person shall make, cause, or permit any unreasonably loud, disturbing, or unnecessary noise that disrupts the peace, quiet, or comfort of any person within the Town, or that exceeds the maximum permissible sound levels established in Section 15-804.

Sec. 15-804. – Sound Limits and Activity Regulations.

(a) The following maximum sound levels shall apply. Sound shall be measured at a distance of ten (10) feet from the property line of the parcel where the sound originates or, where appropriate and practical, at a distance of fifty (50) feet from the noise source. The Town Official shall determine the measurement location based on site conditions and public accessibility.

(1) Residential Areas:

- a. Daytime Hours: 70 dBA
- b. Nighttime Hours: 60 dBA

(2) Commercial and Resort Areas:

- a. Daytime Hours: 75 dBA
- b. Nighttime Hours: 60 dBA

(b) Construction Activity shall not exceed 80 dBA. If the Town determines that construction activity exceeds 80 dBA, the Contractor shall reduce noise levels or obtain authorization from the Town to continue such activity for a specified duration.

(c) Commercial Landscaping Activity shall not exceed 80 dBA.

(d) All sound levels shall be measured by a Town Official using a properly calibrated Sound Level Meter.

Sec. 15-805. – Specific Prohibited Activities.

The following activities are deemed to be public nuisances and are prohibited under this Chapter:

(a) Operating two-cycle engine leaf blowers. This prohibition shall take effect twelve (12) months following the effective date of this Ordinance.

(b) Operating amplified music, radios, televisions, speakers, musical instruments, or similar devices in a manner that is plainly audible inside any other residence or business not associated with the sound source, unless permitted by the Town.

(c) Allowing an animal to make continuous or repetitive noise for more than ten (10) consecutive minutes that is plainly audible at or beyond the property line of the parcel where the animal is kept.

(d) Generating excessive noise from events, parties, or gatherings at Short-Term Rentals or other properties, where such noise disrupts adjacent or nearby properties, unless the event is approved or permitted by the Town through the Town's Special Event Application process.

(e) Operating a motor vehicle that emits sound in violation of Section 56-5-5020 of the South Carolina Code of Laws.

(f) Operating Construction Activity, Commercial Landscaping Activity, or Golf Course Maintenance during the following prohibited hours, regardless of sound level, unless prior written approval is obtained:

- (1) Construction Activity:
 - a. Between 7:00 p.m. and 7:00 a.m., Monday through Friday
 - b. Between 5:00 p.m. and 8:00 a.m., Saturday
 - c. At any time on Sundays and Town-Recognized Holidays
- (2) Commercial Landscaping Activity:
 - a. Between 6:00 p.m. and 8:00 a.m., Monday through Saturday
 - b. At any time on Sundays and Town-Recognized Holidays
- (3) Golf Course Maintenance:
 - a. Between 7:00 p.m. and 6:30 a.m., Monday through Saturday
- (4) Kiawah Island Community Association Activity on major arterial roads (Kiawah Island Parkway, Governor's Drive, and Ocean Course Drive) only:
 - a. Between 7:00 p.m. and 6:30 a.m., Monday through Saturday
 - b. At any time on Sundays and Town-Recognized Holidays

Construction Activity, Commercial Landscaping Activity, or Golf Course Maintenance occurring during the prohibited hours listed above, or exceeding the applicable sound limits established in Section 15-804, shall require prior written approval by the Town. Such approval shall only be granted in emergencies or for critical infrastructure work where no reasonable alternative schedule exists. Approvals shall be limited in scope and duration and shall specify the permitted hours of activity.

Sec. 15-806. – Exemptions.

The provisions of this Chapter shall not apply to:

- (a) Emergency vehicles and emergency work, including post-storm cleanup, debris removal, and restoration activities following hurricanes, tropical storms, or other significant weather events
- (b) Municipal or utility work performed for public safety
- (c) Town-approved community or special events, including those defined in Section 12-106(3) of the Town's Code of Ordinances
- (d) Beach or wildlife management activities conducted by the Town or its authorized agents
- (e) Other activities authorized by the Town

Sec. 15-807. – Enforcement.

This Chapter shall be enforced by the Town of Kiawah Island Code Enforcement Officers.

Town Officials are authorized to take enforcement action in response to violations of this Chapter, including, but not limited to, issuing verbal warnings, written citations, stop-work orders, or initiating penalties as provided in Section 15-808.

Property owners, property managers, contractors, and commercial operators are responsible for ensuring that their guests, tenants, employees, and invitees comply with this Chapter and

may be held jointly or individually liable for violations occurring on, or arising from, their property or operations.

Sec. 15-808. – Penalties.

Violations of this Chapter shall be subject to the following penalties:

(a) For a first offense, the violator may receive a written warning or be assessed a civil fine not to exceed one hundred dollars (\$100).

(b) For a second offense within any twelve (12) month period, the violator shall be assessed a civil fine not to exceed two hundred fifty dollars (\$250).

(c) For a third or subsequent offense within the same twelve (12) month period, the violator shall be assessed a civil fine not to exceed five hundred dollars (\$500).

In addition to the fines above, the Town may revoke any applicable short-term rental license in accordance with Section 14-509 of the Town's Code of Ordinances, or revoke or suspend a business license pursuant to the procedures set forth in Section 4-315 of the Town's Code of Ordinances. The Town may also issue stop-work orders or pursue other enforcement remedies as authorized by law.

Each day that a violation continues shall constitute a separate offense.



TAB 4

TOWN COUNCIL

Agenda Item

Chapter 5; Section 2-205 - Mayor Pro Tempore

- a) After any general election for council, the council shall, at the first meeting of the newly constituted council, elect from its membership a mayor pro tempore to serve for a term of not more than two years.
- b) The mayor pro tempore shall act as mayor during the absence or disability of the mayor. If a vacancy occurs in the office of mayor, the mayor pro tempore shall serve until a successor is elected.
- c) In the event of the sickness or temporary absence of the mayor pro tempore, while acting as mayor, the councilmembers present shall elect a presiding officer. In the event of the resignation or permanent absence of the mayor pro tempore, the mayor and council shall elect a council member to serve as mayor pro tempore until the next council election.

(Code 1993, § 2-205)

State law reference - S.C. Code of Laws 1976, § 5-7-190



TAB 5

TOWN COUNCIL

Agenda Item

Chapter 5; Section 2-504 - Town Attorney

- a) At the first regular meeting of the council following the inauguration meeting, the council shall appoint an officer to be known as the town attorney, who shall hold office at the pleasure of council or until a successor is duly appointed and qualified.
- b) The town attorney must be a member of the South Carolina Bar and be admitted to practice law in
- c) It shall be the duty of the town attorney whenever called upon by council, or the necessity arises, to give his advice and direction to the council, or any member thereof, or to the town clerk on any and all legal questions which may arise in the course of the administration of the town government, or in the discharge of the duties of their respective offices; and whenever required to do so by the council, he shall give his legal opinion in writing. He shall draw or supervise the drawing or drafting of all ordinances, and other instruments of writing relative to the business of the town when required to do so by the council or any member thereof; and shall, whenever notified to do so, attend the meetings of the council and shall perform such other duties as required by the council. The town attorney shall receive such compensation for the discharge of his duties as fixed by the council.

(Code 1993, § 2-504)

State law reference - Municipal attorney, S.C. Code of Laws 1976, § 5-7-230



TAB 6

TOWN COUNCIL

Agenda Item

Chapter 5; Section 2-505 - Town Treasurer

- a) At the first regular meeting of the council following the inauguration meeting, the council shall appoint an officer to be known as the town treasurer, who shall hold office at the pleasure of council or until a successor is duly appointed and qualified.
- b) Before entering upon the duties of office, the town treasurer shall enter into a bond in such sum as shall be approved by the council for the faithful performance of the duties of the office.
- c) The town treasurer shall perform the following duties:
 - 1) Collect all claims and accounts that may be due and payable to the town;
 - 2) Receive all money belonging to the town;
 - 3) Issue all licenses and badges for which provision may be made and collect all fees for licenses that may be imposed;
 - 4) Pay all bills owed by the town when approved by council;
 - 5) Deposit funds in banks as designated by council;
 - 6) Make statements as to the financial condition of the town as ordered by the council;
 - 7) Keep account of all money and accounts and inventories of town property, real and personal, and report to council as requested;
 - 8) Maintain a record of all town capital assets;
 - 9) Prepare a town budget as requested by the town; and
 - 10) Perform such other duties as may be required by the council.

(Code 1993, § 2-505)

State law reference - Municipal treasurer, S.C. Code of Laws 1976, § 5-9-40



TAB 7

TOWN COUNCIL

Agenda Item

Chapter 5; Section 2-503 - Town Clerk

- a) At the first regular meeting of the council following the inauguration meeting, the council shall appoint an officer to be known as the town clerk, who shall hold office at the pleasure of the council or until a successor is duly appointed and qualified.
- b) The town clerk shall perform the following duties:
 - 1) Give notice to the members of the council of regular and special meetings of the council;
 - 2) Attend all meetings of the council, keep minutes of the proceedings of the council, and maintain the minutes in a book to be known as "The Minutes of the Meetings of the Town Council of the Town of Kiawah Island, South Carolina";
 - 3) Have custody of the seal of the town; and
 - 4) Schedule the use of public buildings.
- c) The town clerk shall act as secretary for the mayor and council. As such, the town clerk must have sound secretarial skills.
- d) The town clerk shall handle other clerical duties as required by the mayor or council.
- e) The town clerk shall perform such other duties as may be required by the council.

(Code 1993, § 2-503)

State law reference— Municipal clerk, S.C. Code of Laws 1976, § 5-7-220.



TAB 8

TOWN COUNCIL

Agenda Item

Ordinance 2026-01 and Ordinance 2026-02 Materials

Town of Kiawah Island Zoning Ordinance Amendment Request Case REZ25-000001 & AZO25-000014 Case History

Planning Commission Meeting: December 3, 2025
Public Hearing and First Reading: January 6, 2025
Second Reading: TBD

CASE INFORMATION

Applicant: Jonathan and Lisa Weitz

Representative: Mary Shahid

Location: 245 Eagle Point Road

Parcel Identification: 265-02-00-167

Property Size: 1.7 acres

Zoning District: R-1, Residential Zoning.

Key Location Designation: Fixed Dock Location Eagle Point, East – G, Eagle Point

Application: The Applicant is requesting to amend the *Town of Kiawah Island Land Use Planning and Zoning Ordinance* Sec. 12-78 - Dock Key Locations to allow a floating dock for property located at 245 Eagle Point Road. The property currently contains a fixed dock (Key Dock Designation G). The applicant/property owner is requesting this amendment to allow a floating dock (Key Dock Designation 37) for the property. (TMS# 265-02-00-167).

The proposed amendment would add to Table 2N. Town of Kiawah Island Key Locations Floating Docks a new Key Location Designation 37, Eagle Point North, with an authorized shoreline of 50 linear feet, and one authorized floating dock at Lot 245.

The proposed amendment would modify Table 20. Town of Kiawah Island Key Locations Fixed Docks removing a fixed dock for Lot 245 at Key Location Designation G, Eagle Point, East.

Land Use Information: The subject property is currently developed with a single-family residence. The subject property is owned by Jonathan and Lisa Weitz. According to Charleston County Records, the Weitz's purchased the subject property on May 3, 2024. The Town of Kiawah Island identified this property as part of Fixed Dock Key Location G, Eagle Point East, pursuant to Sec. 12-78 – Dock Key Locations in the *Town of Kiawah Island Land Use Planning and Zoning Ordinance*. The Ordinance allows for a fixed dock stretching across properties 245 & 243 Eagle Point of 600 linear feet. The subject property has an existing fixed dock.

The proposed map amendment would modify Sec. 12-62 Zoning Map, the Town of Kiawah Island Key Locations Map (Exhibit 12A-2), mapping the location of the proposed Key Location Designation 37, Eagle Point North, and modifying the existing Key Location Designation G.

The applicant has submitted preliminary permit drawings for a proposed modification of a recreational floating dock located at 245 Eagle Point Road. The proposed drawings include a Sea Pen floating boat lift to replace existing fixed pierhead, and a proposed floating ramp landing.

RECOMMENDATION BY THE PLANNING COMMISSION

Pursuant to §12-158(3) of the *Land Use Planning and Zoning Ordinance* “The Planning Commission shall review the proposed text amendment and/or zoning map amendment and take action, recommending that the Town Council approve or deny the proposed amendment. The Planning Commission may hold a public hearing in accordance with the procedures in section 12-156. The Planning Commission's recommendation shall be based on the approval criteria of subsection (6) of this section. The Planning Commission shall submit its recommendation to the Town Council within 30 working days of the Planning Commission meeting at which the amendment was introduced. A simple majority vote of Planning Commission members present, and voting shall be required to approve the amendment.”

DECISION ON AMENDMENT BY THE TOWN COUNCIL

Pursuant to §12-158(5) of the *Land Use Planning and Zoning Ordinance* “After receiving the recommendation of the Planning Commission, the Town Council shall hold one or more public hearings, and any time after the close of the public hearing, take action to approve, approve with modifications, or deny the proposed amendment based on the approval criteria of subsection (6) of this section. A simple majority vote of Town Council members present, and voting shall be required to approve the amendment. Zoning map amendments shall not be approved with conditions. Prior to action on a proposed code text amendment, the Town Council may, in the exercise of its legislative discretion, invoke the "pending ordinance doctrine" by ordinance so that no building permits shall be issued for structures which would be affected by the proposed amendment until the Town Council has rendered its decision on the proposed amendment.

APPROVAL CRITERIA & APPLICANT'S RESPONSE

Pursuant to §12-158(6) of the *Land Use Planning and Zoning Ordinance*, (6) Approval criteria. Text and zoning map amendments to the ordinance may be approved if the following approval criteria have been met:

a. The proposed amendment is consistent with the purposes and intent of the adopted Town of Kiawah Island Comprehensive Plan;

Applicant's Response: The proposed text and map amendment is consistent with the purpose of and intent of the adopted Town of Kiawah Island Comprehensive Plan. Specifically, page V-26 of the Sept. 3, 2019 Amended Comprehensive Plan provides that the purpose of Dock Key Locations Ordinance 2003-05 is to control the location and installation of docks to prevent their uncontrolled proliferation along the Island's river and stream frontage. This proposed amendment is consistent with this purpose because the request does not request any new docks but simply requests a change of designation to be consistent with the application of the Ordinance across the many rivers and creeks of the Island. No new docks will be added. A fixed dock is already in place and this amendment is simply to allow the addition of a floating dock. In addition, the proposed reduction of 636.26 feet of fixed dock entitlement in exchange for only 50 feet of floating dock designation also is consistent with controlling the proliferation of docks. The Ordinance also provides design criteria for docks which are met with a floating dock at the proposed location.

Lastly, SCDES regulations allow for up to 240 sq ft of pierhead to be built on the creek fronting 245 Eagle Point due to no potential access via dockage from the opposite side of the creek (See 30-1(D)(50). The applicant purposefully built less than entitled in order to minimize the impact on the environment and also minimize the impact on the view of the adjacent property owner. This is consistent with the intent of the Comprehensive Plan to minimize the impact on the Island's river and stream frontage.

b. The proposed amendment is consistent with the purposes and intent of this article;

Applicant's Response: *The proposed amendment is consistent with the purposes and intent of this article, specifically Section 12-78, Dock Key Locations and the Key Location Map. The proposed amendment seeks to reclassify a fixed dock for a floating dock in a location where all the design criteria within Section 12-78(b)(6) can be met while seeking to eliminate a portion of a Key Location where a dock would not meet the design criteria. Furthermore, a review of the Key Location Map makes clear the intent was to locate floating docks on larger creeks or waterways with sufficient width and depth to allow for suitable boat mooring without restricting navigation. The proposed amendment is consistent with that intent. The width of the creek on the northwest shoreline of the property is wider and deeper than many properties already entitled to floating docks. In addition, the Key Location Map makes it clear the intent was to locate fixed piers on creeks that are generally less than 50 feet and boat mooring was not reasonable. The creek on the northwest shoreline of 245 Eagle Point is sufficiently wide enough to meet all the requirements of both the Town and SCDES in terms of a floating dock and also wider than many creeks where floating docks are currently allowed.*

c. The purpose of the proposed amendment is to further the general health, safety and welfare of the Town of Kiawah Island;

Applicant's Response: *The proposed amendment satisfies the above requirement by complying with the goals of the Comprehensive Plan and the Land Use Planning and Zoning Ordinance of the Town of Kiawah Island.*

d. The proposed amendment corrects an error or inconsistency or meets the challenge of a changed condition.

Applicant's Response: *The proposed amendment both corrects an error or inconsistency and also meets the challenge of a changed condition. As shown by a review of the 2001 and 2025 Charleston County GIS maps, the creek on the northwest shoreline of the property has clearly widen since 2001. The creek has grown approximately 32% in width from 79.5 feet to 104.7 feet today. It is also significantly wider than what is depicted on the Key Locations Map from 2005. It also corrects an inconsistency in that there are many properties on Kiawah entitled to floating docks that are located on creeks much smaller than the creek here. In addition, a fixed dock location on this property is inconsistent with all other fixed docks in that all are located on creeks no greater than 50 feet in width. This amendment will both correct these inconsistencies and also meet the challenge of a changed geographic condition due to the 32% growth in the creek width. Lastly, the proposed amendment will also make the property consistent zoning amendment granted to the adjacent property at 248 Eagle Point. To not allow this amendment would be inconsistent.*

PLANNING STAFF REVIEW

#REZ25-000001 | Key Dock Location Map Amendment

Planning staff finds the proposed map amendment **satisfies** the approval criteria pursuant to §12-158(6) and **recommends approval**.

#AZO25-000014 | Key Dock Location Text Amendment

Planning staff finds the proposed text amendment **satisfies** the approval criteria pursuant to §12-158(6) and **recommends approval with the following condition:**

Key Location 37 (Floating Dock designation) is established with an authorized shoreline of 50 linear feet for the subject property and the existing Key Location G (Fixed Dock designation) is reduced from 600 linear feet to 200 linear feet of authorized shoreline.

The current Fixed Dock Key Location G authorizes 600 linear feet of fixed-dock shoreline shared across Lots 245 and 243 Eagle Point Road. This modification maintains the functional dock access historically granted to that parcel while still allowing the applicant at 245 Eagle Point Road to convert to Floating Dock Key Location 37 with an authorized 50 linear feet of shoreline.

PLANNING COMMISSION MEETING DECEMBER 3, 2025

Notifications: Notice of this meeting has been published and posted in accordance with the Freedom of Information Act and the requirements of the Town of Kiawah Island.

The property owner Mr. Weitz and the applicant's representative Mary Shahid responded to Commissioners questions regarding potential impacts, by explaining that the proposed plan involves completely removing the 100-foot pier head plus an additional 35 feet of elevated walkway, which would allow access to the water for boat storage or kayaking while also reducing the visual impact on neighbors. They also clarified that the change would actually be less impactful than the current dock, as it would remove multiple pilings, shorten the walkway, and the floating portion would never touch the bottom at low tide. The floating dock would also include a "sea pen" structure that would contain boats and prevent leaks from affecting the environment.

At its December 3, 2025 meeting, the Planning Commission voted 6-1 to recommend approval of both proposed amendments. The Commission recommended approval including conditions recommended by staff for case #AZO25-000014: Key Location 37 (Floating Dock designation) is established with an authorized shoreline of 50 linear feet for the subject property and the existing Key Location G (Fixed Dock designation) is reduced from 600 linear feet to 200 linear feet of authorized shoreline.

TOWN COUNCIL PUBLIC HEARING & MEETING JANUARY 6, 2026

Notifications: Notice of this meeting has been published and posted in accordance with the Freedom of Information Act and the requirements of the Town of Kiawah Island.



Zoning Map & Text Amendment:
#REZ25-000001 & #AZO25-000014

Planning Commission Meeting
December 3, 2025 | Kiawah Island Municipal Center

1



**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

APPLICATION REQUEST(S):

1) #REZ25-000001 | Key Dock Location Map Amendment

Request to amend Sec. 12-62. Zoning Map to amend the Key Locations Map to modify the fixed dock designation to allow a floating dock at the subject property.


2) #AZO25-000014 | Key Dock Location Text Amendment

Request to amend Section 12-78. Dock Key Locations to modify the fixed dock designation to allow a floating dock at the subject property.

APPLICANT / PROPERTY OWNER:	Jonathan and Lisa Weitz
REPRESENTATIVE:	Mary Shahid
SUBJECT PROPERTY:	245 Eagle Point Road
PARCEL IDENTIFICATION:	265-02-00-167
PROPERTY SIZE:	1.7 acres
ZONING DISTRICT:	R-1, Residential Zoning
KEY LOCATION DESIGNATION:	Fixed Dock Location Eagle Point East – G

2

2



**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

3

ZONING ORDINANCE:

Pursuant to **Sec. 12-78. - Dock key locations.**, “Key locations are specific shoreline and marsh sites where floating and fixed docks are permitted to be constructed. The purpose and intent of this key location zoning is to strictly control location and installation of all docks, floating and fixed, so as to prevent their uncontrolled proliferation along Kiawah Island’s river and stream frontage.”

Two dock types: **Fixed Docks:** Dock sites identified by letters and are generally **intended for fishing and crabbing and have no movable parts to them.** **Floating Docks:** Dock sites identified by numbers are predesignated to be floating docks. These have a **separate floating pontoon or platform attached to them, which rises and falls with the tides.** Floating docks are suitable for mooring small watercraft.


TOKI Key Terms:

Dock means a structure extending into or upon a waterway, marshland or other natural water feature that provides docking space for ten boats or less.

Fixed Dock means a structure that can either be a portion of a dock that does not float, but is fixed, e.g., the walkway and pierhead, or it is the fixed pierhead which is the deck area at the end of a walkway.

Floating Dock means a structure that is part of a pier or dock that floats and provides easy access to moored boats.

3



**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

4

CASE INFORMATION:

The applicant is requesting to amend the Town of Kiawah Island Land Use Planning and Zoning Ordinance, Article II - Zoning, Division 2. – Zoning Map/Districts, Sec. 12-62. Zoning Map – Key Location Map and Sec. 12-78 - Dock Key Locations **to allow a floating dock** for property located at 245 Eagle Point Road.

The subject property is currently developed with a single-family residence constructed in 2009. The **subject property currently contains a fixed dock** as allowed pursuant to Table 20. Town of Kiawah Island Key Locations Fixed Docks under Key Dock Designation G, Eagle Point, East. The existing dock is a fixed dock containing a 4’ x 221’ walkway and pierhead. The existing dock was permitted January 28, 2025.

The subject property was issued a violation on Sept. 19, 2025, regarding the installation of a Slide Moor system to the fixed dock. On Sept. 24th, the violation was corrected by the property owner.

The applicant has submitted preliminary permit drawings for a proposed modification of a recreational floating dock located at 245 Eagle Point Road. The proposed drawings include a Sea Pen floating boat lift to replace existing fixed pierhead, a proposed floating ramp landing.

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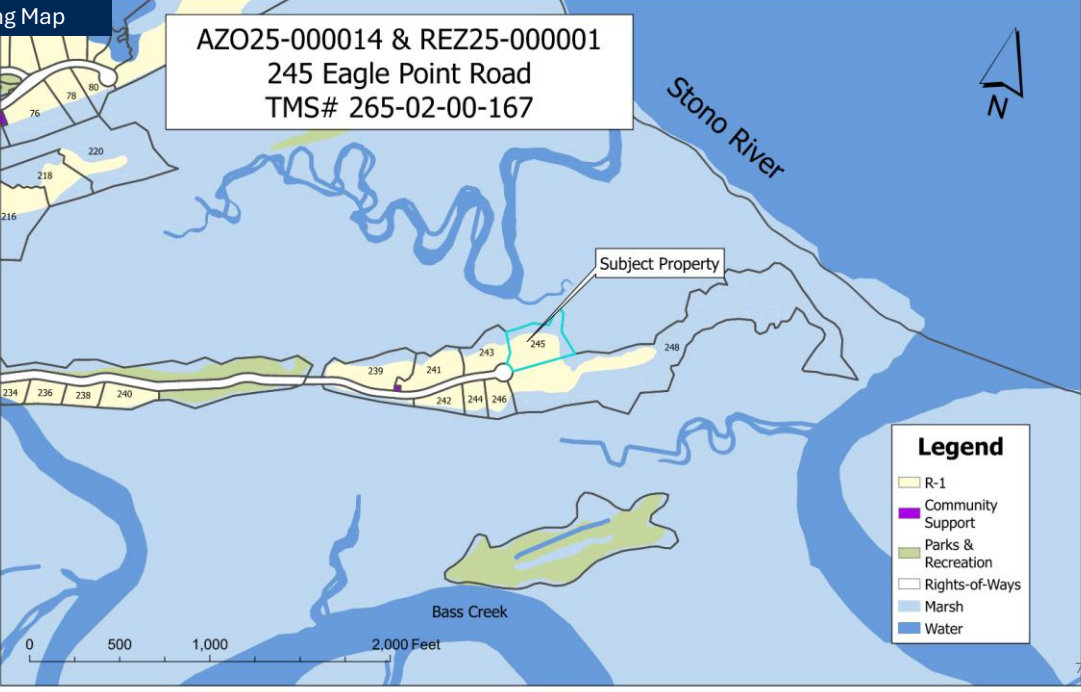
Aerial



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Zoning Map

AZO25-000014 & REZ25-000001
 245 Eagle Point Road
 TMS# 265-02-00-167



7

Site Photos



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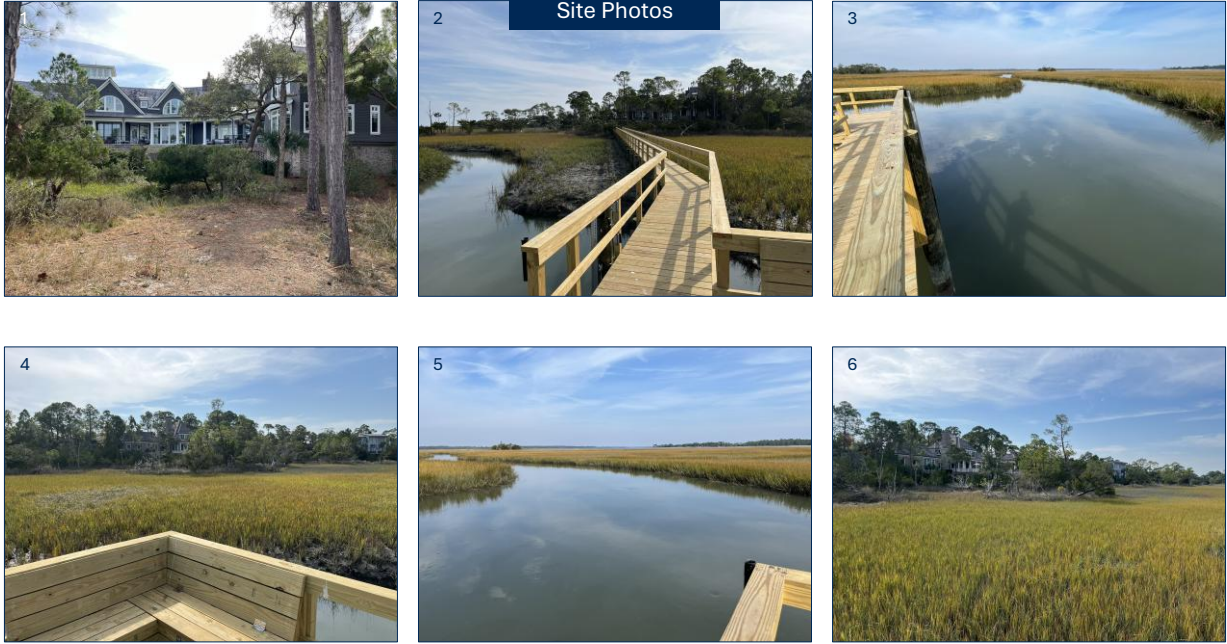
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Site Photos



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9



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10

Zoning Map & Text Amendment Request(s):
 #REZ25-000001 &
 #AZO25-000014

Subject Property:
 245 Eagle Point Road, Kiawah Island
 TMS# 265-02-00-167

APPLICATION REQUESTS:

The proposed amendment would add a new floating dock Key Location to Table 2N. Town of Kiawah Island Key Locations Floating Docks.

- Designation 37 - Eagle Point North (Lot 245)

The proposed amendment would eliminate the fixed dock designation for Lot 245. modify Table 2O. Town of Kiawah Island Key Locations Fixed Docks.

- Designation G – Eagle Point, East

Table 2N. Town of Kiawah Island Key Locations Floating Docks

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
36	Eagle Point East		1	Lot 248
37	Eagle Point North		1	Lot 245

Table 2O. Town of Kiawah Island Key Locations Fixed Docks

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
G	Eagle Point, East	600	1	Lot 245

11

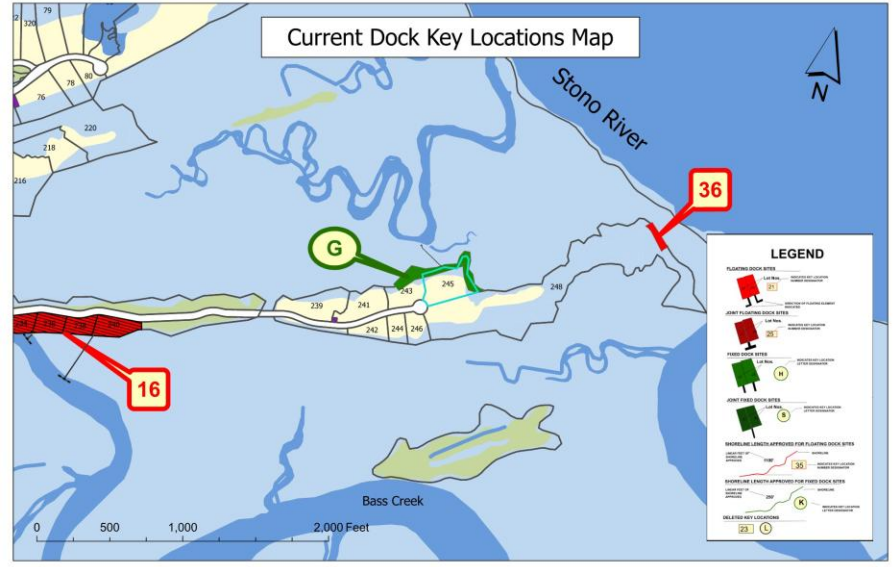
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Zoning Map & Text Amendment Request(s): #REZ25-000001 & #AZO25-000014

Subject Property: 245 Eagle Point Road, Kiawah Island TMS# 265-02-00-167

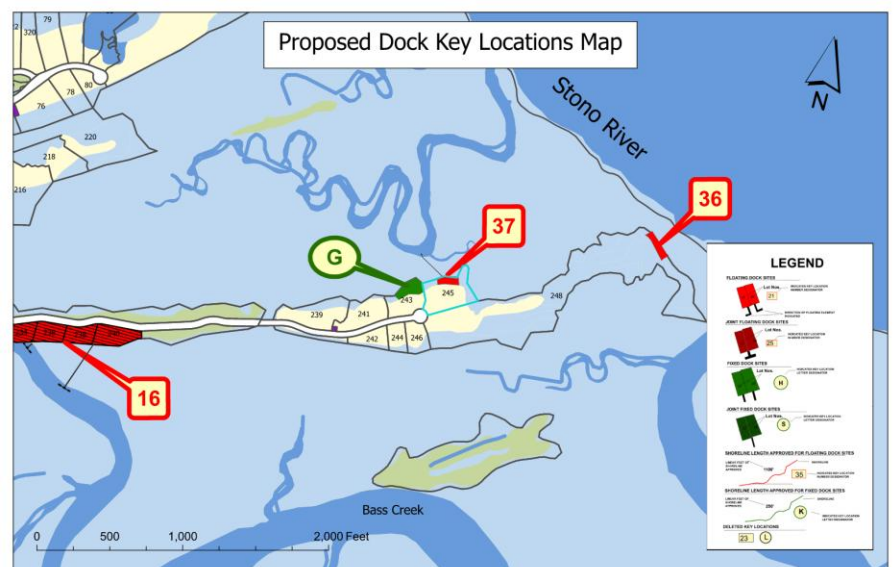
KEY LOCATION MAP EXHIBIT:



Zoning Map & Text Amendment Request(s): #REZ25-000001 & #AZO25-000014

Subject Property: 245 Eagle Point Road, Kiawah Island TMS# 265-02-00-167

KEY LOCATION MAP EXHIBIT:



Aerial



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RECOMMENDATION BY THE PLANNING COMMISSION:

Pursuant to §12-158(3) of the Land Use Planning and Zoning Ordinance “The Planning Commission shall review the proposed text amendment and/or zoning map amendment and take action, **recommending that the Town Council approve or deny the proposed amendment.** The Planning Commission may hold a public hearing in accordance with the procedures in section 12-156. The Planning Commission's recommendation shall be based on the approval criteria of subsection (6) of this section. The Planning Commission shall submit its recommendation to the Town Council within 30 working days of the Planning Commission meeting at which the amendment was introduced. A simple majority vote of Planning Commission members present, and voting shall be required to approve the amendment.”

15

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DECISION ON AMENDMENT BY THE TOWN COUNCIL:

Pursuant to §12-158(5) of the Land Use Planning and Zoning Ordinance “After receiving the recommendation of the Planning Commission, the Town Council shall hold one or more public hearings, and any time after the close of the public hearing, **take action to approve, approve with modifications, or deny the proposed amendment based on the approval criteria** of subsection (6) of this section. A simple majority vote of Town Council members present, and voting shall be required to approve the amendment. Zoning map amendments shall not be approved with conditions.

Prior to action on a proposed code text amendment, the Town Council may, in the exercise of its legislative discretion, invoke the "pending ordinance doctrine" by ordinance so that no building permits shall be issued for structures which would be affected by the proposed amendment until the Town Council has rendered its decision on the proposed amendment.

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APPROVAL CRITERIA:

Pursuant to §12-158(6) of the Land Use Planning and Zoning Ordinance “Text and zoning map amendments to the ordinance may be approved if the following approval criteria have been met:

- a. The proposed amendment is consistent with the purposes and intent of the adopted Town of Kiawah Island Comprehensive Plan;
- b. The proposed amendment is consistent with the purposes and intent of this article;
- c. The purpose of the proposed amendment is to further the general health, safety and welfare of the Town of Kiawah Island; and
- d. The proposed amendment corrects an error or inconsistency or meets the challenge of a changed condition.”

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**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

18

PLANNING STAFF REVIEW:

1) #REZ25-000001 | Key Dock Location Map Amendment
Request to amend Sec. 12-62. Zoning Map to amend the Key Locations Map to modify the fixed dock designation to allow a floating dock at the subject property.

Planning staff finds the proposed map amendment satisfies the approval criteria pursuant to §12-158(6) and recommends approval.

2) #AZO25-000014 | Key Dock Location Text Amendment
Request to amend Section 12-78. Dock Key Locations to modify the fixed dock designation to allow a floating dock at the subject property.

Planning staff finds the proposed text amendment satisfies the approval criteria pursuant to §12-158(6) and recommends approval with the following condition:

Key Location 37 (Floating Dock designation) is established with an authorized shoreline of 50 linear feet for the subject property and the existing Key Location G (Fixed Dock designation) is reduced from 600 linear feet to 200 linear feet of authorized shoreline.

18



**Planning
Commission
Recommendation**

**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

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Planning Commission Recommendation:

The Planning Commission voted 6-1 to recommend approval of both proposed amendments. The Commission recommended approval including conditions recommended by staff #AZO25-000014: Key Location 37 (Floating Dock designation) is established with an authorized shoreline of 50 linear feet for the subject property and the existing Key Location G (Fixed Dock designation) is reduced from 600 linear feet to 200 linear feet of authorized shoreline.

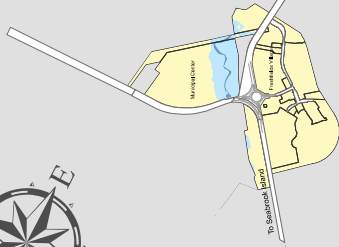
Table 2N. Town of Kiawah Island Key Locations Floating Docks

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
36	Eagle Point East		1	Lot 248
37	Eagle Point North	50	1	Lot 245

Table 2O. Town of Kiawah Island Key Locations Fixed Docks

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
G	Eagle Point, East	600-200	1	Lot 245

19



Key Locations

Floating Dock Locations

- Beachwalker Park - 1
- Inlet Cove - 2
- Kiawah River Commons - 3
- Little Rabbit - 4
- Mingo Point - 5
- Old Dock Road - 6

Fixed Dock Locations

- Summer Islands, West - 29
- Old Dock Rd / Ruddy Turnstone - A
- The Settlement, East - B
- Bass Pond, East - C
- Terrapin Island - D
- Blue Heron, North - E
- Eagle Point, East - G
- Falcon Point Rd., East - H

Fixed Dock Locations

- Blue Heron, West - J
- Cougar Island, West - K
- Ocean Course Drive - N
- Falcon Point, East - O
- Shell Creek Landing, East - R
- Shell Creek Landing, South - S
- Club Cottages - T
- Marsh Cottages - U

Fixed Dock Locations

- Summer Islands, Central - 21
- Salt Cedar, West - 22
- Cougar Island, West Tip - 24
- Cormorant Island, South - 25
- Cougar Island, West Tip - 26
- Older Island, East - 27
- Summer Islands, East - 28

Fixed Dock Locations

- Preserve, North East Tip - 14
- Cormorant Island, North - 15
- Eagle Point, Central - 16
- Eagle Point, West - 17
- Salt Cedar Lane, East Tip - 18
- Salt Cedar Lane, East - 19
- Preserve, South - 20

Fixed Dock Locations

- The Settlement, West - 7
- Rhett's Bluff, North - 8
- Capt. Maynard's, North - 9
- Capt. Maynard's, South - 10
- Rhett's Bluff, South - 11
- Vanderhorst House - 12
- Terrapin Island - 13



LEGEND

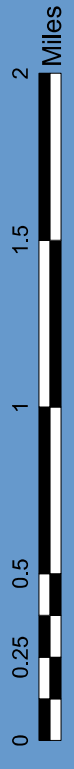
- FLOATING DOCK SITES**
Lot Nos. [Red Box with Number] INDICATES KEY LOCATION NUMBER DESIGNATOR
- JOINT FLOATING DOCK SITES**
Lot Nos. [Red Box with Number] INDICATES KEY LOCATION NUMBER DESIGNATOR
- FIXED DOCK SITES**
Lot Nos. [Green Box with Letter] INDICATES KEY LOCATION LETTER DESIGNATOR
- JOINT FIXED DOCK SITES**
Lot Nos. [Green Box with Letter] INDICATES KEY LOCATION LETTER DESIGNATOR
- SHORELINE LENGTH APPROVED FOR FLOATING DOCK SITES**
110' SHORELINE LENGTH APPROVED
- SHORELINE LENGTH APPROVED FOR FIXED DOCK SITES**
250' SHORELINE LENGTH APPROVED
- DELETED KEY LOCATIONS**
[Red Box with Number] INDICATES KEY LOCATION NUMBER DESIGNATOR
- [Green Box] INDICATES KEY LOCATION LETTER DESIGNATOR

- Kiawah Beach Access
- Constructed Docks
- Marsh
- Water

Town of Kiawah Island Key Location Map

ORDINANCE 2003-005 ADOPTED AUGUST 12, 2003
ORDINANCE 2005-008 ADOPTED OCTOBER 12, 2005

*AS AMENDED



SUBJECT TO ANY CURRENT DEVELOPMENT AGREEMENT
THIS MAP HAS BEEN PREPARED FROM DEEDS, PLATS AND OTHER PUBLIC RECORDS AND DATA RECORDED TO DATE. PROPERTY LINES DEPICTED DO NOT NECESSARILY REPRESENT ACTUAL LAND SURVEYS. THIS MAP IS NOT A LEGAL DOCUMENT. GMD IS A REGISTERED PROFESSIONAL SURVEYOR IN THE STATE OF SOUTH CAROLINA STATE PLATE COORDINATES.
Print Date: 07/03/2019
File: TOKI_GIS_KEYLOCATIONMASTER
Community Development Department
Zoning & Planning
Prepared By: JWTJ

Mary D. Shahid
Direct (843) 720-1788
Fax 8434148242
Email mshahid@maynardnexsen.com



October 31, 2025

John W. Taylor, Jr.
Town of Kiawah Island Planning Department
4475 Betsy Kerrison Parkway
Kiawah Island, South Carolina 29455

Re: 245 Eagle Point Road
Kiawah Island, South Carolina 29455
Request for Key Location Zoning Text and Map Amendment
Letter of Intent

Dear John:

This firm represents Jonathan and Lisa Weitz, owners of the above referenced property, in their efforts to seek a zoning text and map amendments to the Town's Zoning Ordinance requesting a change from Key Location G to a new Floating Dock location 37 in order to allow a floating dock and/or boat mooring on the approximately 104 feet wide creek adjacent to the property. If approved, the Weitz's would like to remove the existing fixed pier and approximately 25 feet of elevated walkway and replace it with a gangway to a floating dock.

As background for this request, the Weitz's purchased this property on May 3, 2024. The Town of Kiawah Island identified this property as part of Fixed Dock Key Location G pursuant to Ordinances 2003-005 and 2005-008. I am attaching a copy of the Key Locations Map from 2005 which shows 245 Eagle Point as part of Key Location G.

In 2018, the Town of Kiawah Island unanimously granted a zoning text and map amendment to 248 Eagle Point (immediately adjacent to 245 Eagle Point). This amendment removed 248 from Key Location G and created Floating Dock Location 36 based on a finding of a change in geographic conditions and the inability to permit a dock in the designated location under the Town's regulations. The factual basis for 245 Eagle Point's current request are nearly identical.

The northwestern property line of 245 Eagle Point fronts a large creek measuring between 90 and 104 feet wide at two different points adjacent to 245 Eagle Point. Upon review of the Charleston County GIS maps from 2001, this creek previously measured between 54 and 79 feet at the same locations adjacent to 245 Eagle Point. It is clear from comparing the 2001 and 2025 GIS maps, that this creek has become substantially wider than it was when the Key Location Map was adopted in 2005. It is also substantially wider than what is depicted on Key Location Map. Additionally, the water level in this creek at the existing fixed dock location ranges from 12 feet

(mean high water) to 6 feet (mean low water). This is significantly deeper than many other areas on Kiawah currently zoned for floating docks. Pictures at high and low tide attached.

The Eastern property line fronts a small tributary measuring between 12-15 feet wide and is therefore not a permissible dock location under SCDES regulations, nor the Town. SCDES requires a minimum creek width of 20 feet and the Town requires a minimum width of 25 feet.

Additionally, the Key Location Map currently allows floating docks on numerous creeks less than 104 feet (some significantly less). I have attached several examples based on a review of the 2025 Charleston County GIS Map. Furthermore, all fixed dock locations on creeks (not lagoons or ponds) appear to be on creeks that are 50 feet or less. Rezoning of 245 Eagle Point to a floating dock location would make it consistent with other Key Locations on Kiawah Island.

In December of 2024, the Weitz's began the process of designing a fixed pier dock significantly smaller than they are currently entitled to in an attempt to minimize the view impact on the adjacent property owner. SCDES regulations allow for a 240 sq ft pierhead (SCDES Regs 30-1(D)(50) in the permitted location given the special geographic conditions. The Weitz's only permitted and constructed a 100 sq ft pierhead in order to minimize any view impacts. In addition, the pierhead was designed such that it could be easily removed and replaced with a floating dock (as shown on the attached conceptual drawing) if future entitlement to boat mooring was granted by the Town. The conceptual drawing was specifically designed in order to eliminate a portion of the elevated walkway and the pierhead to least impact views from the western side of the property.

On January 21, 2025, the Weitz's received a zoning permit from the Town to construct the fixed dock to the large creek fronting the northwestern property line. This dock was approved by SCDES on April 9, 2025 and approved U.S. Army Corp of Engineers on June 11, 2025. (permits attached). The dock construction was completed in September 2025. (photos attached).

As outlined in the enclosed application forms, the Weitz's are seeking creation of Floating Dock Key Location 37 for a shoreline length of 50 feet along the northwestern shoreline of 245 Eagle Point Road adjacent to the 104 feet wide creek. Additionally, this request also includes the proposed 636.26 feet reduction of Key Location G according to the January 14, 2025 survey commissioned by the Weitz's. The proposed reduction of 636.26 feet is tied to the granting of the proposed Key Location 37.

In consideration of these requests, please consider that this property is already a designated Key Location and it is merely a requested change from fix dock to floating dock based on a changed geographic condition (similar to the basis for rezoning 248 Eagle Point in 2018). This is consistent with the Town's Comprehensive Plan statement that the Dock Key Locations Ordinance 2003-5 is to prevent the uncontrolled proliferation of docks. With this request, there will be no increase in the number of docks. In addition, similar to the rezoning of Eagle Point 248, a portion of the area designated Location G on the subject property is not allowed a dock under either Town or

SCDES regulations since that tributary is only 12-15 ft wide and a dock is not permissible by either the Town or SCDES.

This rezoning request is consistent with the Town's Comprehensive Plan in that there are no new docks. It also addresses a changed condition, and results in a substantial reduction of linear footage under the Dock Key Location Ordinance. Additionally, this rezoning request is essentially identical to the previously approved rezoning granted to the adjacent property at 248 Eagle Point. It is clear from a review of Key Location Map that the intent of the Ordinance was to allow floating docks on the larger creeks of Kiawah and permit fixed docks on smaller creeks that measured less than 50 ft and are not suitable for boat mooring. This request brings 245 Eagle Point in line with the intent of the Ordinance and consistent with the many other Kiawah properties that are entitled to floating docks and boat mooring on creeks smaller than the creek fronting the property.

Please let me know if you need any further information to evaluate this request. I look forward to discussing this with you soon.

s/Mary D. Shahid

Maynard Nexsen P. C.

205 King Street Fourth Floor

Charleston, SC 29401

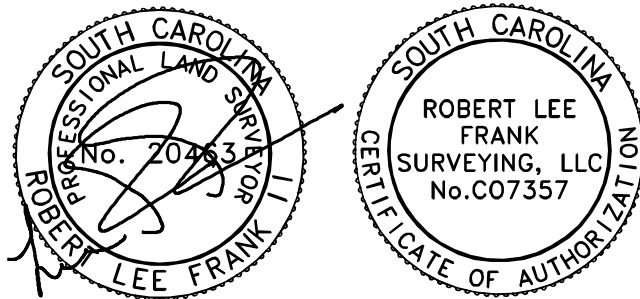
843.345.5838

mshahid@maynardnexsen.com

A PROPOSED
RECREATIONAL DOCK AT
245 EAGLE POINT ROAD
LOCATED ON KIAWAH ISLAND
CHARLESTON COUNTY
SOUTH CAROLINA

THESE DRAWINGS ARE FOR DOCK PERMITTING
ONLY AND DO NOT CONSTITUTE A BOUNDARY
SURVEY OF THIS PROPERTY.

TMS #265-02-00-167

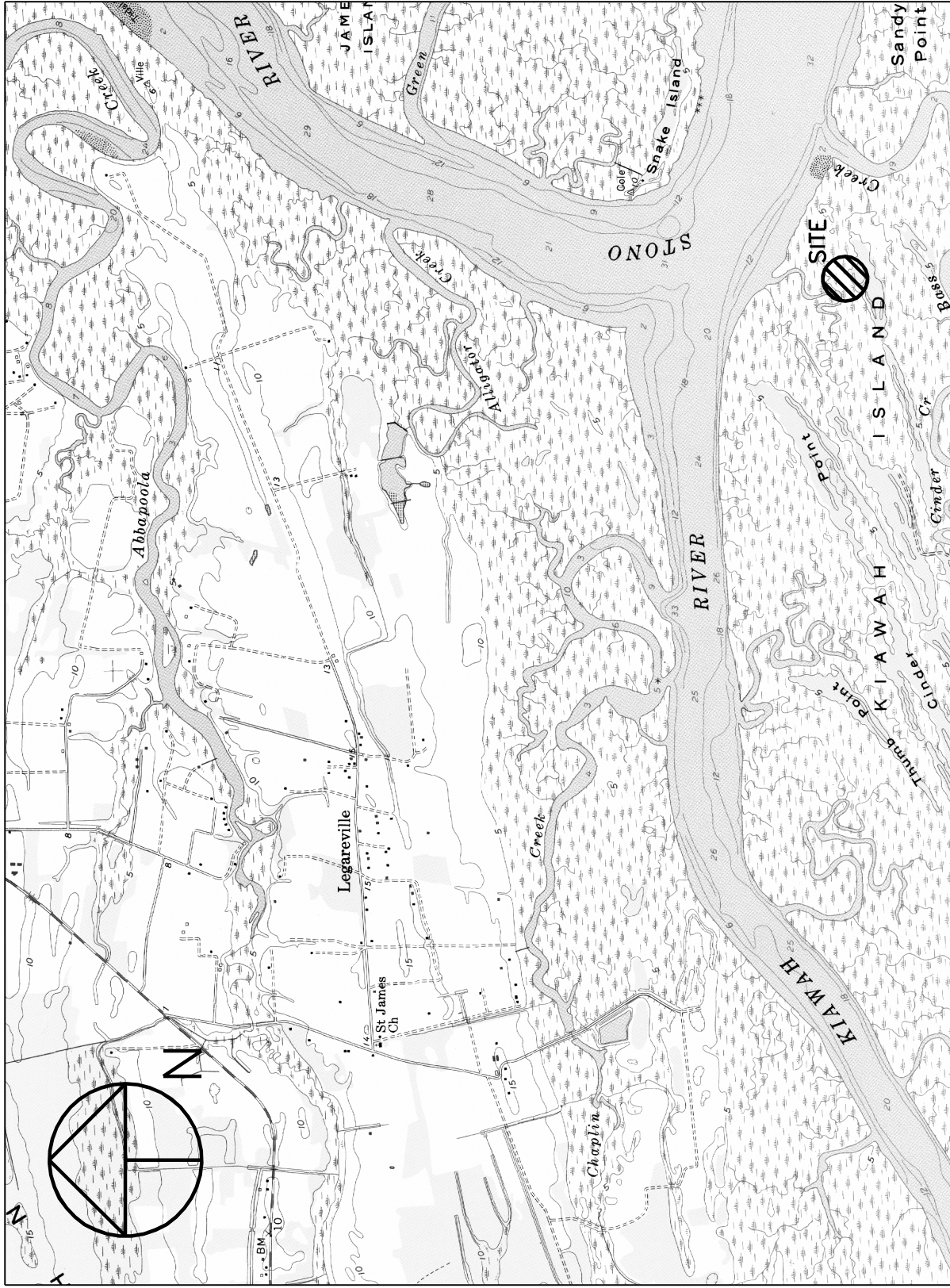


APPLICATION BY:
JONATHAN WEITZ
ADDRESS: 245 EAGLE POINT RD.
DATE: JANUARY 14, 2025
REVISED:

ROBERT LEE FRANK SURVEYING, LLC
5986 SAVANNAH HWY. - RAVENEL, S.C. 29470
Phone: 843-762-4608
E-mail - robertfranklandsurveying@comcast.net
WEB ADDRESS: www.robertfranksurveying.com

SHT. NO.

1 OF 6

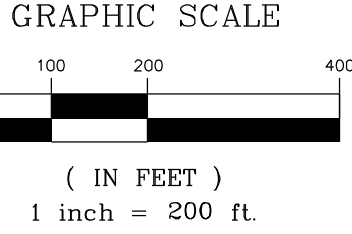
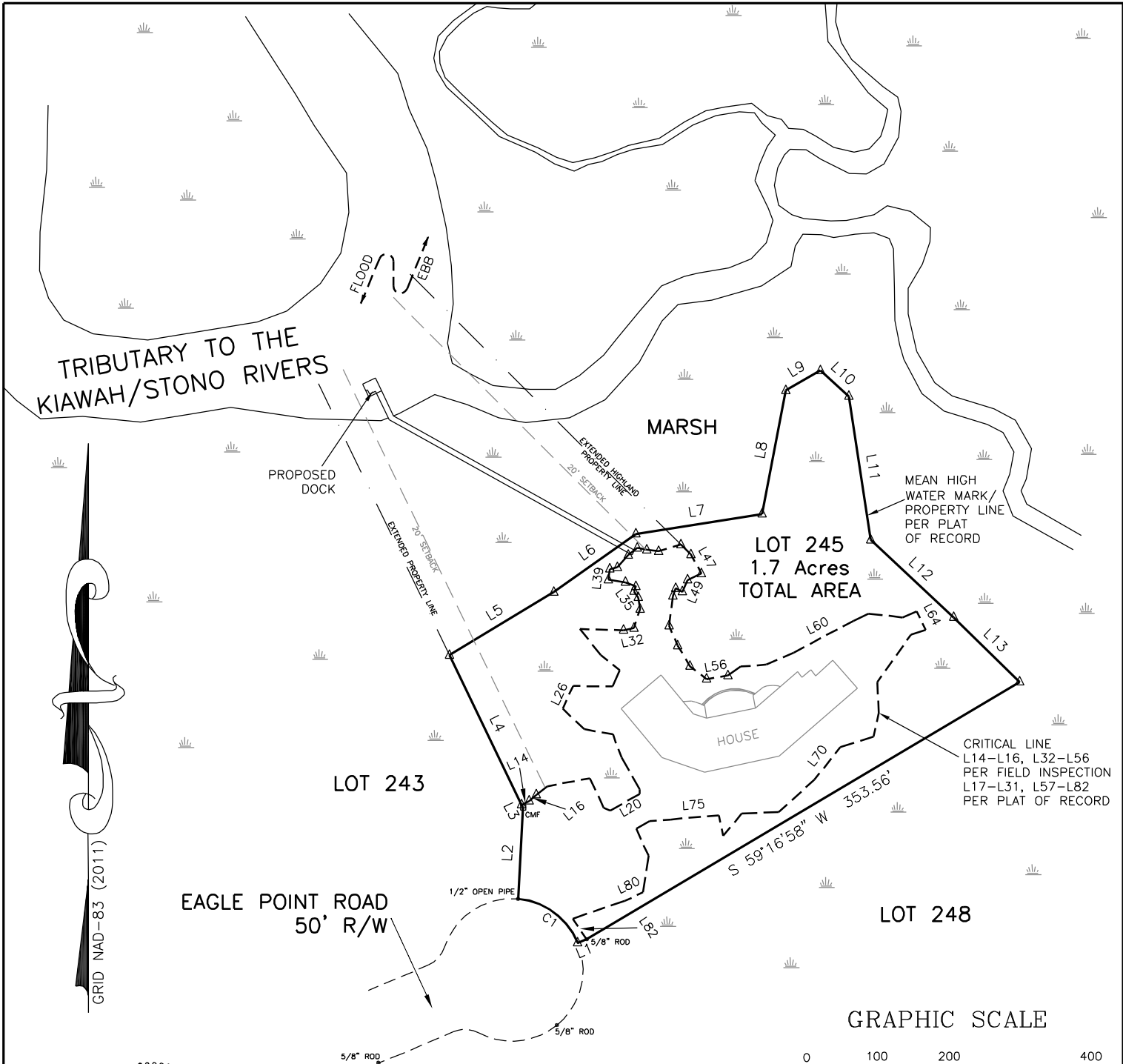


ADJOINING PROPERTY OWNERS:

1. STEPHEN AND JEAN KANA (LOT 243)
2. ROBERT AND SUZAN TILLOTSON (LOT 248)
3. KIAWAH RESORT ASSOCS., LP (MARSH)

TMS #265-02-00-167

APPLICATION BY: JONATHAN WEITZ	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME LEGAREVILLE QUADRANGLE MAP	SHT. NO. 3 OF 6
ADDRESS: 245 EAGLE POINT RD. DATE: JANUARY 14, 2025 REVISED:	PROJECT LATITUDE/LONGITUDE: LATITUDE - 32.630976° LONGITUDE - 80.019922°		



- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

APPLICATION BY: JONATHAN WEITZ <hr/> ADDRESS: 245 EAGLE POINT RD. <hr/> DATE: JANUARY 14, 2025 <hr/> REVISED:	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME FULL PLAN VIEW TMS #265-02-00-167	SHT. NO. 4 OF 6
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ADJOINING PROPERTY OWNERS:

1. STEPHEN AND JEAN KANA (LOT 243)
2. ROBERT AND SUZAN TILLOTSON (LOT 248)
3. KIAWAH RESORT ASSOCS., LP (MARSH)



LINE	BEARING	DISTANCE
L1	S 68°01'07" W	6.80'
L2	N 03°05'11" E	64.12'
L3	N 25°46'42" W	2.25'
L4	N 25°46'42" W	116.74'
L5	N 58°51'49" E	85.56'
L6	N 54°43'09" E	70.75'
L7	N 81°05'53" E	89.88'
L8	N 10°43'25" E	88.51'
L9	N 60°04'17" E	28.01'
L10	S 47°48'46" E	27.16'
L11	S 08°40'36" E	101.90'
L12	S 46°48'35" E	79.66'
L13	S 45°35'23" E	64.83'

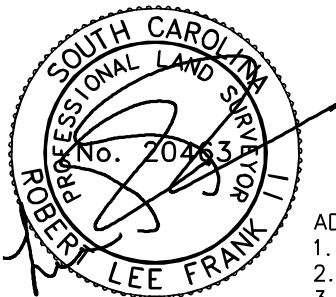
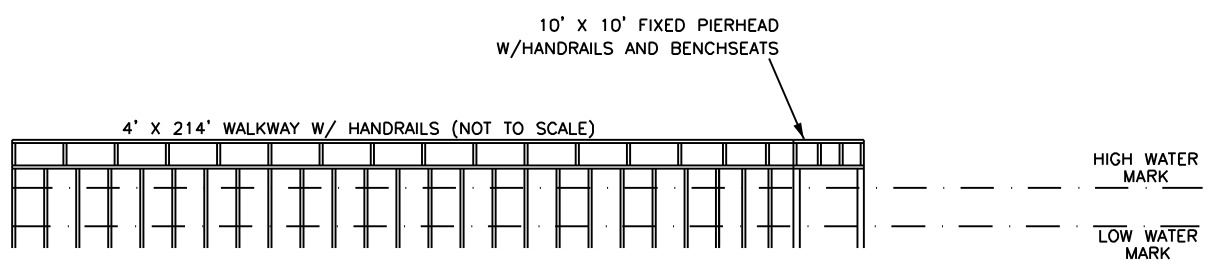
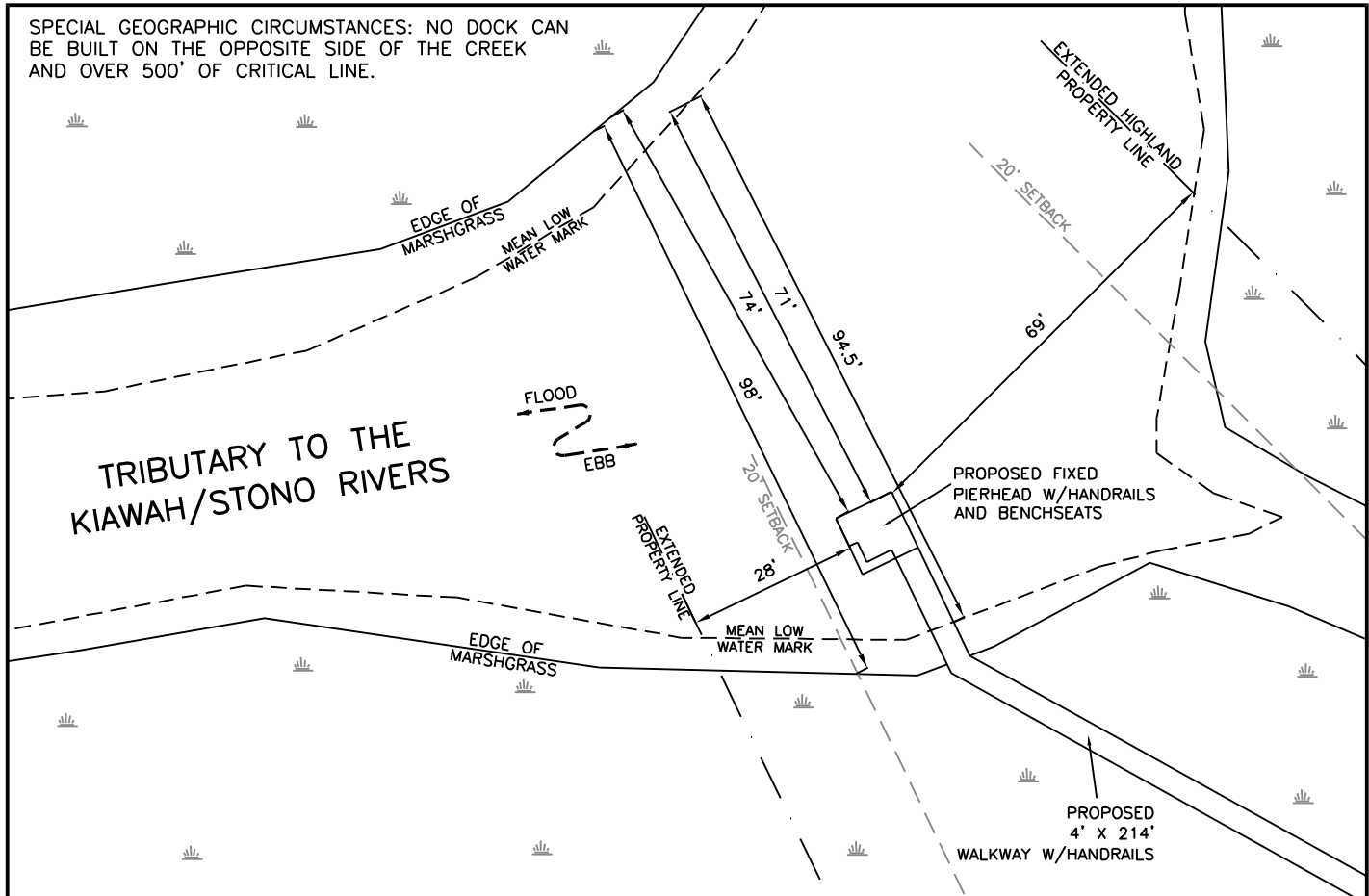
L14	N 64°23'34" E	5.92'
L15	N 47°29'44" E	6.47'
L16	N 52°12'01" E	9.96'
L17	N 79°19'28" E	30.59'
L18	S 24°42'24" E	23.08'
L19	S 66°34'26" E	4.86'
L20	N 60°08'31" E	23.73'
L21	N 03°07'12" E	3.42'
L22	N 29°51'29" W	25.54'
L23	N 20°40'13" W	17.36'
L24	N 79°45'48" W	20.60'
L25	N 46°04'10" W	20.91'
L26	N 24°52'48" E	17.43'
L27	S 89°38'04" E	27.98'
L28	N 23°43'30" E	12.35'
L29	N 51°46'21" W	17.32'
L30	N 38°33'25" W	23.36'
L31	S 88°12'21" E	30.87'
L32	N 77°59'33" E	7.28'
L33	N 18°06'12" E	14.05'
L34	N 09°40'32" W	8.24'
L35	N 34°52'48" W	5.28'
L36	N 23°52'36" E	3.80'
L37	N 68°57'49" W	7.86'
L38	N 80°47'34" W	12.21'
L39	N 08°22'27" E	7.48'
L40	N 77°03'42" E	5.43'
L41	N 41°31'26" E	11.57'
L42	N 50°53'07" E	7.94'
L43	S 78°42'53" E	6.72'
L44	S 82°53'06" E	8.55'
L45	N 73°07'14" E	16.40'
L46	S 45°03'15" E	9.99'
L47	S 28°54'04" E	15.20'

L48	S 64°38'53" W	10.67'
L49	S 24°04'03" W	9.09'
L50	N 62°58'04" W	5.53'
L51	S 19°25'38" W	5.89'
L52	S 07°14'29" W	20.92'
L53	S 23°30'14" E	15.30'
L54	S 31°02'58" E	16.86'
L55	S 51°59'14" E	14.65'
L56	N 80°40'55" E	15.21'
L57	N 54°33'00" E	11.10'
L58	N 85°58'17" E	18.16'
L59	N 65°51'35" E	20.95'
L60	N 62°09'32" E	47.43'
L61	N 64°42'46" E	11.71'
L62	S 84°01'32" E	23.93'
L63	N 68°14'31" E	10.88'
L64	S 26°26'25" E	14.21'
L65	S 71°53'02" W	10.80'
L66	S 35°22'47" W	40.91'
L67	S 02°09'15" E	21.83'
L68	S 11°31'06" W	16.92'
L69	S 73°00'34" W	24.58'
L70	S 38°10'47" W	29.40'
L71	S 47°42'19" W	33.85'
L72	S 87°55'53" W	25.96'
L73	S 40°00'14" W	20.59'
L74	N 10°55'19" W	14.84'
L75	S 85°03'37" W	34.24'
L76	S 85°45'38" W	14.73'
L77	S 60°08'31" W	10.88'
L78	S 24°39'50" E	21.02'
L79	S 08°29'36" W	25.76'
L80	S 64°34'44" W	14.00'
L81	S 71°09'39" W	38.87'
L82	S 34°03'31" E	17.45'

CURVE	RADIUS	ARC LENGTH	CHORD LENGTH	CHORD BEARING	DELTA ANGLE	TANGENT
C1	50.00'	54.71'	52.02'	N 53°35'31" W	62°41'33"	30.46'

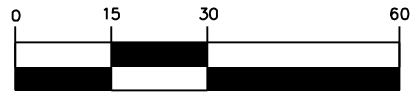
APPLICATION BY: JONATHAN WEITZ	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME LINE DATA TMS #265-02-00-167	SHT. NO. 5 OF 6
ADDRESS: 245 EAGLE POINT RD.			
DATE: JANUARY 14, 2025			
REVISED:			

SPECIAL GEOGRAPHIC CIRCUMSTANCES: NO DOCK CAN BE BUILT ON THE OPPOSITE SIDE OF THE CREEK AND OVER 500' OF CRITICAL LINE.



- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

GRAPHIC SCALE



(IN FEET)
1 inch = 30 ft.

<p>APPLICATION BY: JONATHAN WEITZ</p> <hr/> <p>ADDRESS: 245 EAGLE POINT RD.</p> <hr/> <p>DATE: JANUARY 14, 2025</p> <hr/> <p>REVISED:</p>	<p>LOCATION</p> <p>A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA</p>	<p>SHT. NAME</p> <p>PLAN VIEW</p> <p>TMS #265-02-00-167</p>	<p>SHT. NO.</p> <p>6 OF 6</p>
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EXHIBIT A

All that certain piece, parcel, or lot of land situate, lying and being in the Town of Kiawah Island, Charleston County, South Carolina, containing 1.700 acres, more or less, known and designated as Lot Number Two Hundred Forty-Five (245), Eagle Point, in The Preserve, Phase VII, Parcel 30, Subdivision 432 (a/k/a 245 Eagle Point Road) and shown on a plat by Southeastern Surveying of Charleston, Inc. entitled "A CONDITIONAL SUBDIVISION PLAT OF LOTS 239, 241 THRU 246 AND 248 THE PRESERVE PHASE VII PARCEL 30 SUBDIVISION 432 OWNED BY KIAWAH LAND DEVELOPMENT, LLC LOCATED IN THE TOWN OF KIAWAH ISLAND, CHARLESTON COUNTY, SOUTH CAROLINA" dated June 21, 2004, and recorded in Plat Book EH at pages 332 and 333, with most recent revision shown on a plat by Southeastern Surveying of Charleston, Inc. entitled "A FINAL SUBDIVISION PLAT OF LOTS 239, 241 THRU 246 AND 248 THE PRESERVE PHASE VII PARCEL 30 SUBDIVISION 432 OWNED BY KIAWAH LAND DEVELOPMENT, LLC LOCATED IN THE TOWN OF KIAWAH ISLAND, CHARLESTON COUNTY, SOUTH CAROLINA" dated July 14, 2005, and recorded in Plat Book EJ at pages 200 and 201 (the "Plat"), in the office of the Register of Mesne Conveyances for Charleston County, S.C., (hereinafter the "R.M.C. Office"), said lot having such location, butts and bounds, metes, courses, and distances as will by reference to said plat more fully appear (the "Property").

Said property is subject to all applicable covenants, conditions, restrictions, limitations, obligations and easements of record affecting subject property.

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

AFFIDAVIT FOR TAXABLE OR EXEMPT TRANSFERS

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this Affidavit and I understand such information.
2. The property being transferred is located at 245 Eagle Point Road, Kiawah Island, SC 29455 bearing Charleston County Tax Map Number 265-02-00-167, was transferred by **Susan M. Kearney, Trustee of the Susan M. Kearney Revocable Trust u/i/d January 31, 1997, as amended to Jonathan Pellett Weitz and Lisa D. Weitz** on May 3, 2024.
3. Check one of the following: The deed is
 - (a) X subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 - (b) _____ subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as distribution to a trust beneficiary.
 - (c) _____ exempt from the deed recording fee because (See Information section of affidavit): _____ (If exempt, please skip items 4-7, and go to item 8 of this affidavit.)

If exempt under exemption #14 as described in the Information section of this affidavit, did the agent and principal relationship exist at the time of the original sale and was the purpose of this relationship to purchase the realty? Check Yes _____ or No _____

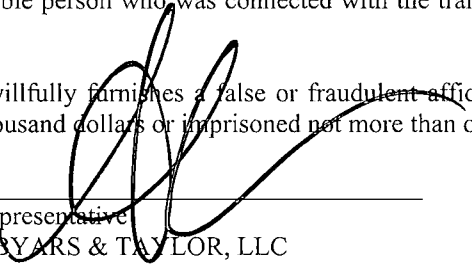
4. Check one of the following if either item 3(a) or item 3(b) above has been checked (See information section of this affidavit.):
 - (a) X The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \$11,500,000.00
 - (b) _____ The fee is computed on the fair market value of the realty which is \$ _____.
 - (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is \$ _____.

5. Check YES _____ or NO X to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. (This includes, pursuant to Code Section 12-59-140(E)(6), any lien or encumbrance on realty in possession of a forfeited land commission which may subsequently be waived or reduced after the transfer under a signed contract or agreement between the lien holder and the buyer existing before the transfer.) If "Yes," the amount of the outstanding balance of this lien or encumbrance is: _____.

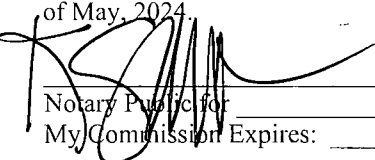
6. The deed recording fee is computed as follows:
 - (a) Place the amount listed in item 4 above here: 11,500,000.00
 - (b) Place the amount listed in item 5 above here: _____
(If no amount is listed, place zero here.)
 - (c) Subtract line 6(b) from Line 6(a) and place result here: 11,500,000.00

7. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as : Legal Representative

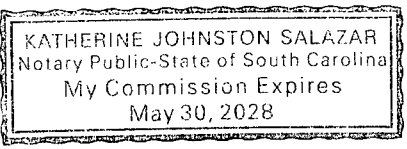
8. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.



Legal Representative
BUIST, BYARS & TAYLOR, LLC

Sworn to before me this 3rd day
of May, 2024.


Notary Public for _____
My Commission Expires: _____



RECORDER'S PAGE



NOTE: This page **MUST** remain with the original document

Filed By:

BUIST BYARS & TAYLOR, LLC
 FRESHFIELDS VILLAGE
 130 GARDNER'S CR PMB 138
 JOHNS ISLAND SC 29455 (COURIER)

RECORDED		
Date:	May 6, 2024	
Time:	12:05:48 PM	
<u>Book</u>	<u>Page</u>	<u>DocType</u>
1243	049	Deed
Karen Hollings, Register of Deeds Charleston County, SC		

MAKER:

KEARNEY SUSAN M TR AL

Note:

RECIPIENT:

WEITZ JONATHAN P AL

of Pages:

Recording Fee	\$ 15.00
State Fee	\$ 29,900.00
County Fee	\$ 12,650.00
Extra Pages	\$ -
Postage	\$ -
Chattel	\$ -
TOTAL	\$ 42,565.00

Original Book:

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AUDITOR STAMP HERE
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 May 08, 2024
 Peter J. Tecklenburg
 Charleston County Auditor

PID VERIFIED BY ASSESSOR
 LMC
 REP _____
 DATE 05/09/2024



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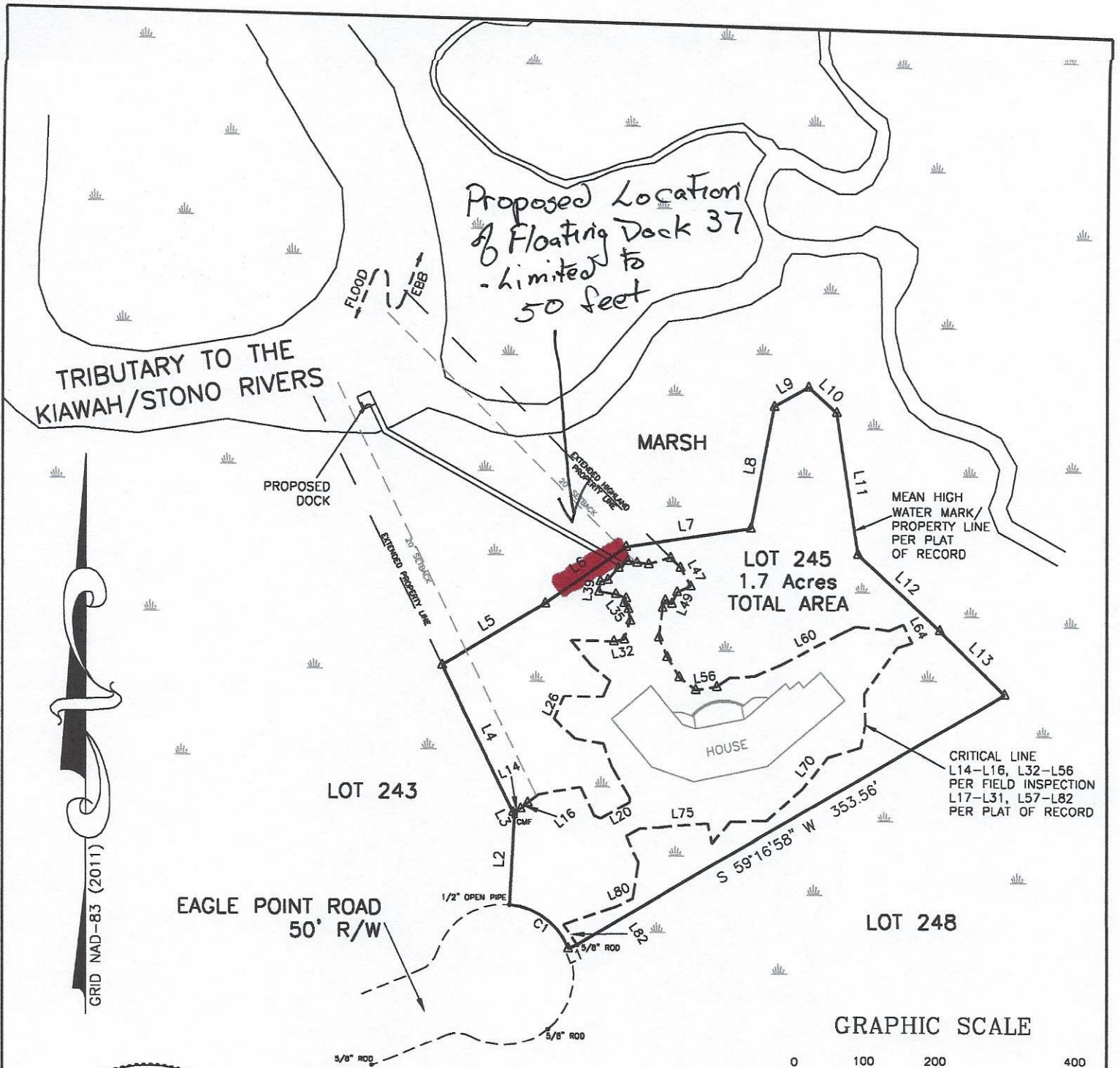
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- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

APPLICATION BY: JONATHAN WEITZ ADDRESS: 245 EAGLE POINT RD. DATE: JANUARY 14, 2025 REVISED:	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME FULL PLAN VIEW TMS #265-02-00-167	SHT. NO. 4 OF 6
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ADJOINING PROPERTY OWNERS:

1. STEPHEN AND JEAN KANA (LOT 243)
2. ROBERT AND SUZAN TILLOTSON (LOT 248)
3. KIAWAH RESORT ASSOCS., LP (MARSH)



LINE	BEARING	DISTANCE
L1	S 68°01'07" W	6.80'
L2	N 03°05'11" E	64.12'
L3	N 25°46'42" W	2.25'
L4	N 25°46'42" W	116.74'
L5	N 58°51'49" E	85.56'
L6	N 54°43'09" E	70.75'
L7	N 81°05'53" E	89.88'
L8	N 10°43'25" E	88.51'
L9	N 60°04'17" E	28.01'
L10	S 47°48'46" E	27.16'
L11	S 08°40'36" E	101.90'
L12	S 46°48'35" E	79.66'
L13	S 45°35'23" E	64.83'

L14	N 64°23'34" E	5.92'
L15	N 47°29'44" E	6.47'
L16	N 52°12'01" E	9.96'
L17	N 79°19'28" E	30.59'
L18	S 24°42'24" E	23.08'
L19	S 66°34'26" E	4.86'
L20	N 60°08'31" E	23.73'
L21	N 03°07'12" E	3.42'
L22	N 29°51'29" W	25.54'
L23	N 20°40'13" W	17.36'
L24	N 79°45'48" W	20.60'
L25	N 46°04'10" W	20.91'
L26	N 24°52'48" E	17.43'
L27	S 89°38'04" E	27.98'
L28	N 23°43'30" E	12.35'
L29	N 51°46'21" W	17.32'
L30	N 38°33'25" W	23.36'
L31	S 88°12'21" E	30.87'
L32	N 77°59'33" E	7.28'
L33	N 18°06'12" E	14.05'
L34	N 09°40'32" W	8.24'
L35	N 34°52'48" W	5.28'
L36	N 23°52'36" E	3.80'
L37	N 68°57'49" W	7.86'
L38	N 80°47'34" W	12.21'
L39	N 08°22'27" E	7.48'
L40	N 77°03'42" E	5.43'
L41	N 41°31'26" E	11.57'
L42	N 50°53'07" E	7.94'
L43	S 78°42'53" E	6.72'
L44	S 82°53'06" E	8.55'
L45	N 73°07'14" E	16.40'
L46	S 45°03'15" E	9.99'
L47	S 28°54'04" E	15.20'

L48	S 64°38'53" W	10.67'
L49	S 24°04'03" W	9.09'
L50	N 62°58'04" W	5.53'
L51	S 19°25'38" W	5.89'
L52	S 07°14'29" W	20.92'
L53	S 23°30'14" E	15.30'
L54	S 31°02'58" E	16.86'
L55	S 51°59'14" E	14.65'
L56	N 80°40'55" E	15.21'
L57	N 54°33'00" E	11.10'
L58	N 85°58'17" E	18.16'
L59	N 65°51'35" E	20.95'
L60	N 62°09'32" E	47.43'
L61	N 64°42'46" E	11.71'
L62	S 84°01'32" E	23.93'
L63	N 68°14'31" E	10.88'
L64	S 26°26'25" E	14.21'
L65	S 71°53'02" W	10.80'
L66	S 35°22'47" W	40.91'
L67	S 02°09'15" E	21.83'
L68	S 11°31'06" W	16.92'
L69	S 73°00'34" W	24.58'
L70	S 38°10'47" W	29.40'
L71	S 47°42'19" W	33.85'
L72	S 87°55'53" W	25.96'
L73	S 40°00'14" W	20.59'
L74	N 10°55'19" W	14.84'
L75	S 85°03'37" W	34.24'
L76	S 85°45'38" W	14.73'
L77	S 60°08'31" W	10.88'
L78	S 24°39'50" E	21.02'
L79	S 08°29'36" W	25.76'
L80	S 64°34'44" W	14.00'
L81	S 71°09'39" W	38.87'
L82	S 34°03'31" E	17.45'

CURVE	RADIUS	ARC LENGTH	CHORD LENGTH	CHORD BEARING	DELTA ANGLE	TANGENT
C1	50.00'	54.71'	52.02'	N 53°35'31" W	62°41'33"	30.46'

APPLICATION BY: JONATHAN WEITZ	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME LINE DATA TMS #265-02-00-167	SHT. NO. 5 OF 6
ADDRESS: 245 EAGLE POINT RD.			
DATE: JANUARY 14, 2025			
REVISED:			



Coastal Consulting

Agency Relations/Environmental Permits

Curtis Joyner, Owner

843-830-8858

PO Box 30937

Charleston, SC 29417

Joynercm@bridgeviewcc.com

October 29, 2025

Ms. Mary Shahid

Maynard Nexsen

205 King Street, Suite 400

Charleston, SC 29401

Re: Weitz dock modification, 245 Eagle Point Road, Kiawah Island, SC

Dear Ms. Shahid:

This letter provides information for your use with the Town of Kiawah Island, in anticipation of amending Agency authorizations (SCDES BCM - BCM05747 and the US Army Corps of Engineers - SAC-2025-00279).

As background, Mr. Weitz and I received Agency authorizations for a very basic dock to be located on Bass Creek at the above-mentioned property which consists of a 4' by 214' walkway with handrails leading to a 10' by 10' uncovered fixed pierhead. Mr. Weitz is planning to modify the authorizations to replace the pierhead with a 3' by 20' ramp to lead from the walkway to a 4' by 4' ramp landing and a 3' by 32' floating catwalk which would parallel a 12' by 32' floating boat storage device.

Upon reviewing the applicable Agency regulations, it appears they can approve this modification. The SCDES BCM definitions and regulations have a base size allowance, and due to special geographic circumstances (no dock form opposite shore), they can authorize a structure up to 240 sq. ft. Walkways, catwalks, and ramps do not factor into this calculation. The USACOE regulations do not possess size-based limitations.

Thank you and let me know if you have any questions.

Sincerely,

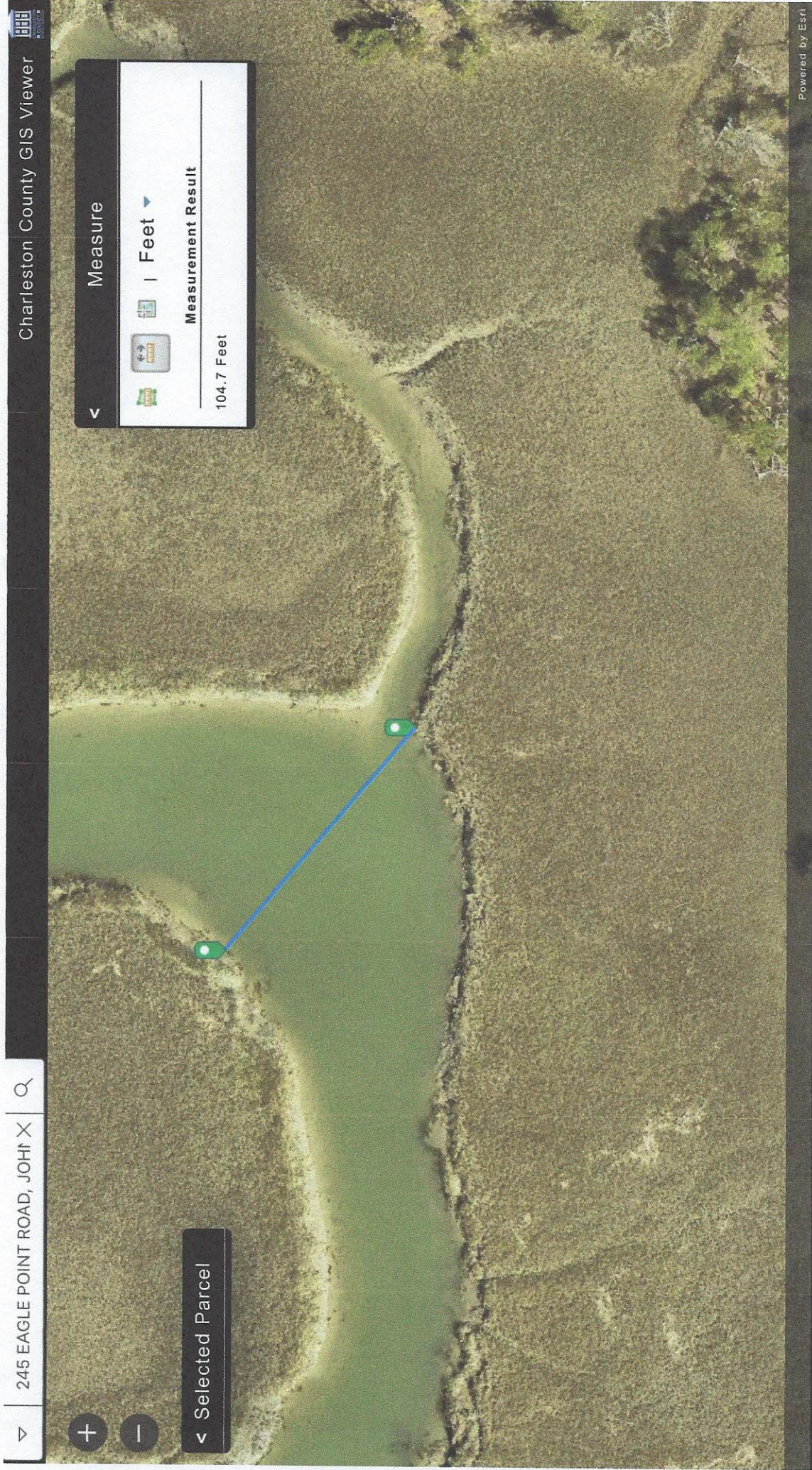
A handwritten signature in black ink, appearing to read "C. Joyner".

Curtis Joyner

BridgeView Coastal Consulting

Cc: Jonathon Weitz

245 Eagle Point . Dimension A
2025



Measure

Feet

Measurement Result

104.7 Feet

245 Eagle Point - 2001 - Dimension A

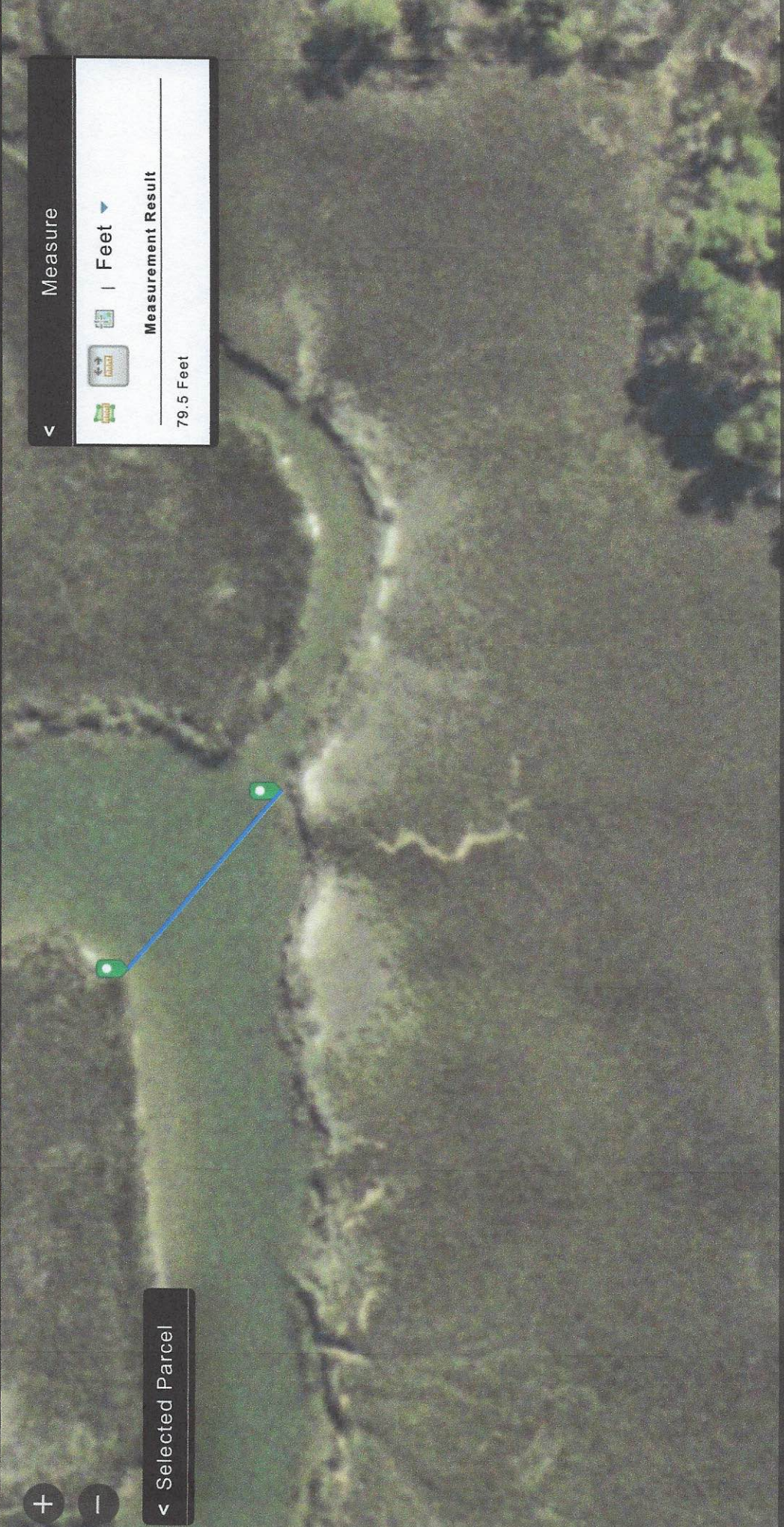
2:19 PM Wed Sep 24

Board of Zoning... Approved Ordin... Claridge's: Lux... Charleston Cou... gisccweb.charl... Session Timeout

gisccweb.charlestoncounty.org

Charleston County GIS Charleston County ROD Charleston County Home Page

245 EAGLE POINT ROAD, JOHN X



Measure

79.5 Feet

Measurement Result

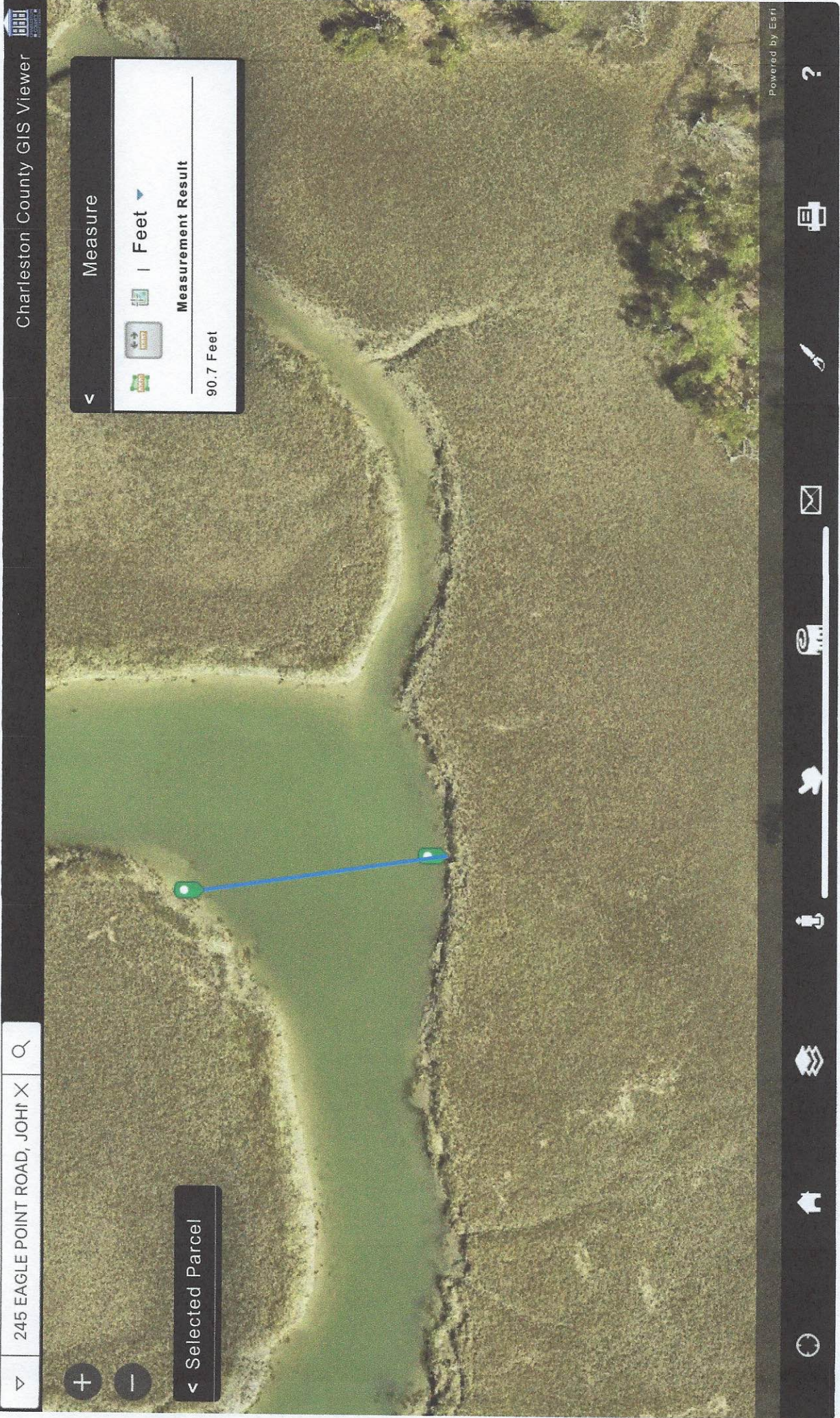
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Charleston County GIS

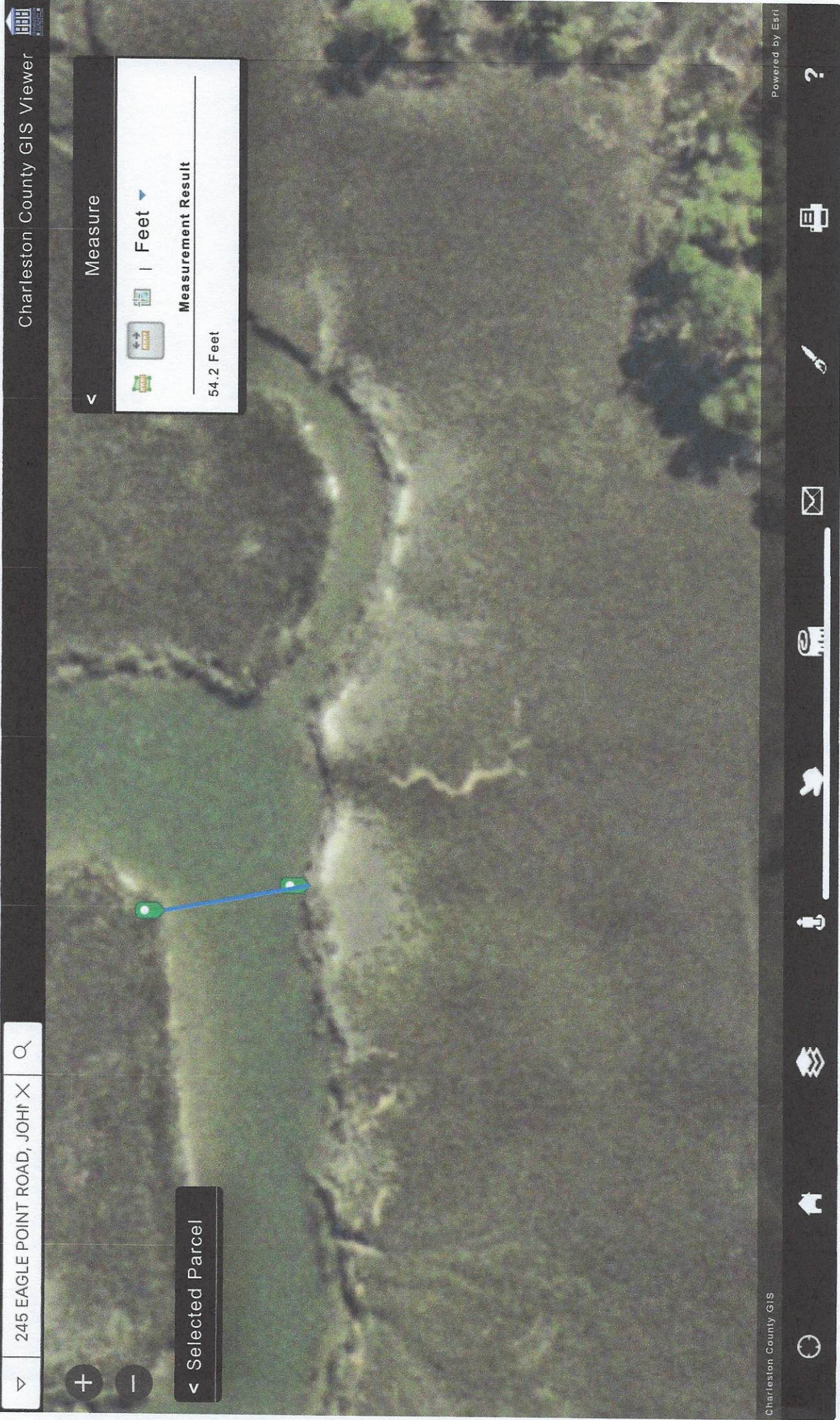
Powered by Esri

Navigation icons: Home, Location, Layers, Measure, Print, Help

245 Eagle Point - 2025
Dimension B



245 Eagle Point - 2001
Dimension B



Depicting the small tributary on eastern shoreline of 245 Eagle Point is not wide enough to meet design criteria of Town of SCDES

Charleston County GIS Viewer

245 Eagle point X Q

Selected Parcel

PID	265020016Z
OWNER1	WEITZ JONATHAN PELLETT
PLAT BOOK PAGE	EJ-200
DEED BOOK PAGE	1243-049
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

14.7 Feet

Measurement Result

Powered by Esri

EXAMPLES OF PROPERTIES WITH FIXED DOCK ENTITLEMENT

Creek at 245 Eagle Point is 104.7 feet

DATA FROM THE 2025 CHARLESTON COUNTY GIS MAP

	Address	Creek Width
1	67 Falcon Point Road	15.7
2	3 Shell Creek Landing	34.5
3	1 Shell Creek Landing	36.8
4	15 Terrapin Island Lane	40.3
5	26 Marsh Cottage Lane	50.5
6	26 Marsh Cottage lane	50.5



67 FALCON POINT ROAD, JOHI X



Selected Parcel

PID	2660700024
OWNER1	ZANGRILLO GINA
PLAT BOOK PAGE	EB-2
DEED BOOK PAGE	0400-939
Jurisdiction	TOWN OF KIAWAH ISLAND

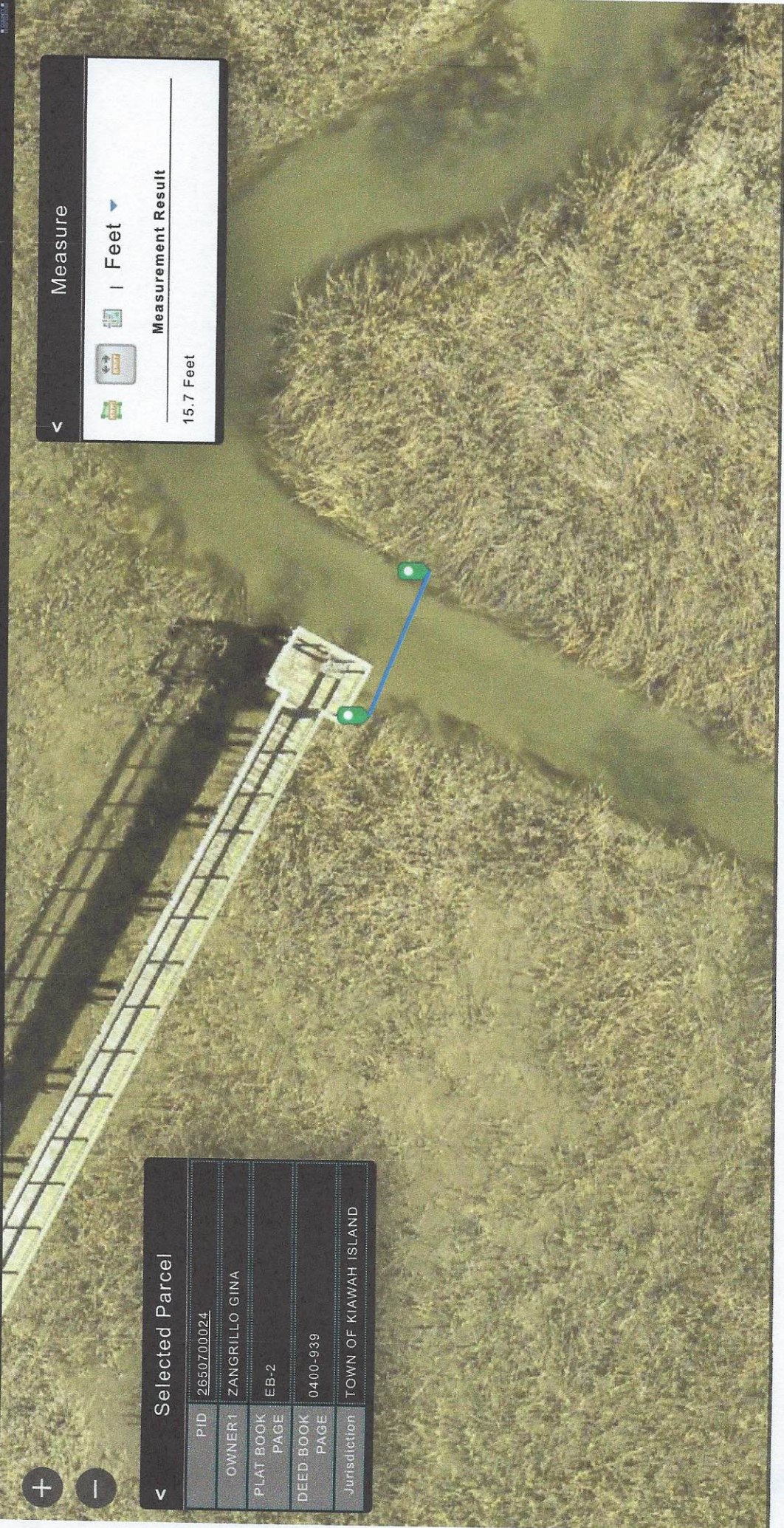
Measure



Feet

Measurement Result

15.7 Feet



3 SHELL CREEK LODGE, JOHN X



Selected Parcel	
PID	2650900037
OWNER	MUELLER HAROLD C TRUST
PLAT BOOK PAGE	ED-43
DEED BOOK PAGE	0986-591
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

34.5 Feet

Measurement Result

1 SHELL CREEK LODGE, JOHN: X

2650500031

2070000006

2650900034

2070000002

2650900037

Selected Parcel

PID	2650900034
OWNER1	CORIO LAWRENCE P
PLAT BOOK PAGE	EA-539
DEED BOOK PAGE	R610-262
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

36.8 Feet

Measurement Result

2070000019

2070000006



< Selected Parcel

PID	2650100001
OWNER1	WATSON STEPHEN H
PLAT BOOK PAGE	EB-165
DEED BOOK PAGE	1166-932
Jurisdiction	TOWN OF KIAWAH ISLAND

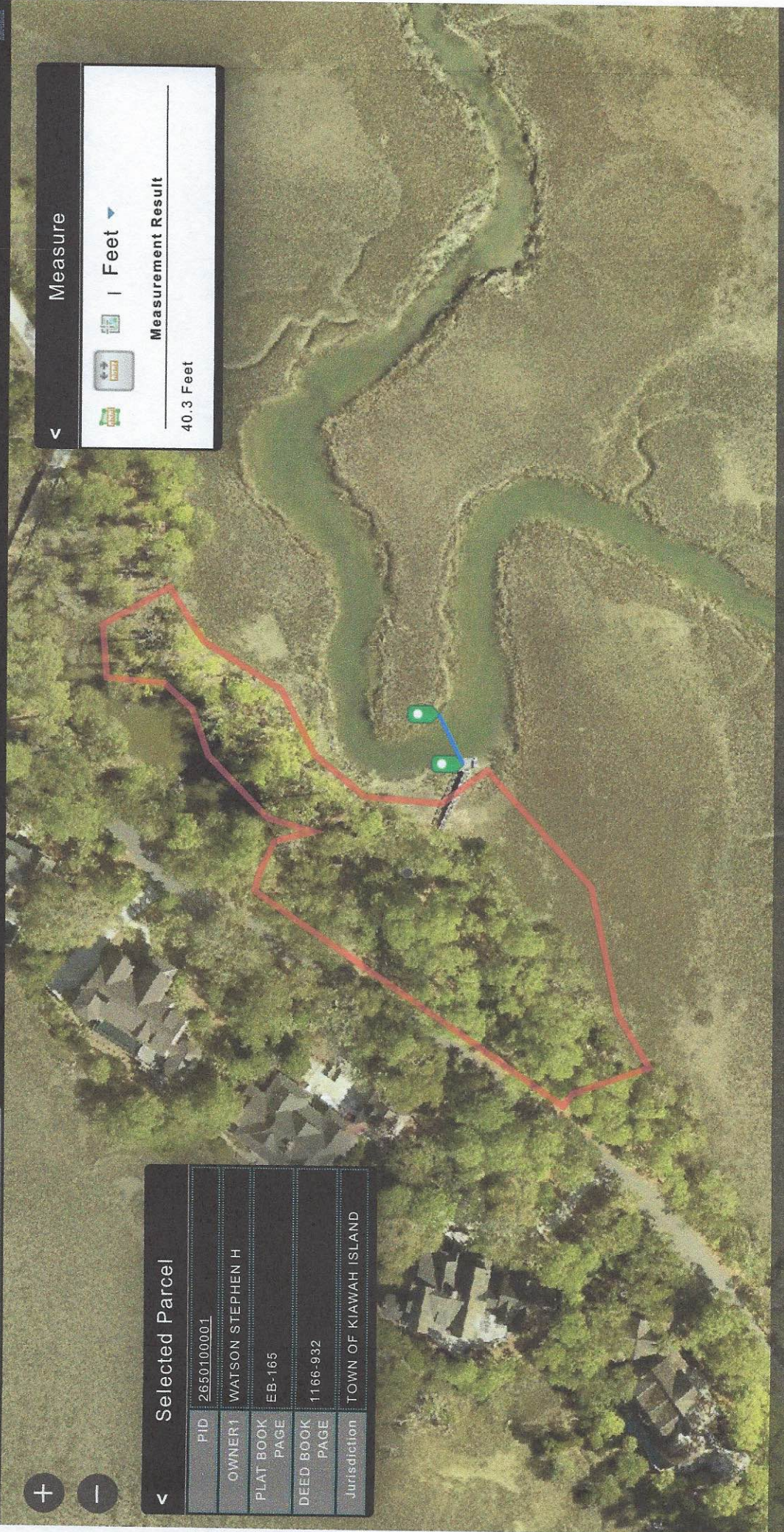
< Measure



| Feet

Measurement Result

40.3 Feet



25 MARSH COTTAGE LANE, JC X



2650900041

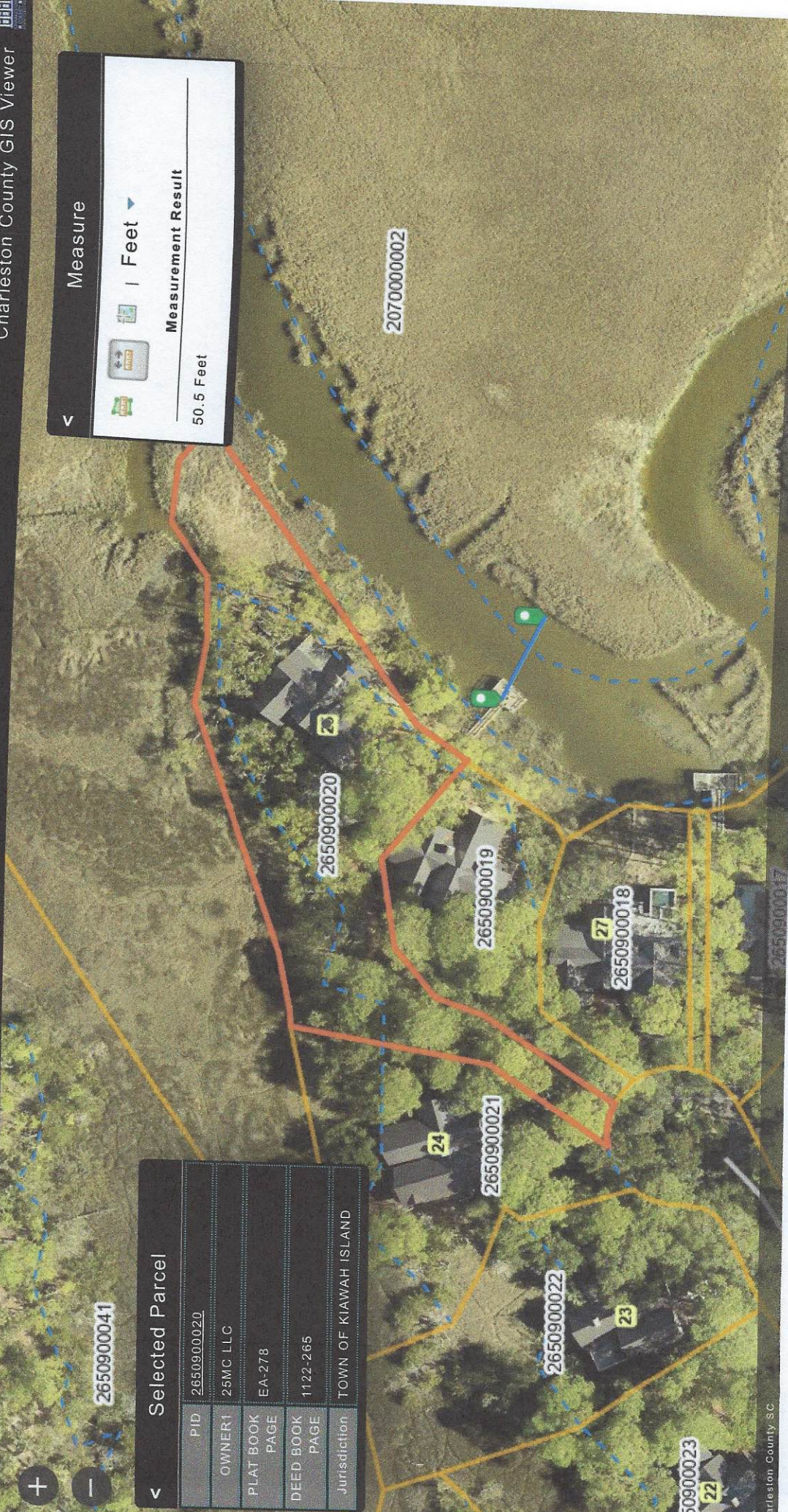
Selected Parcel	
PID	2650900020
OWNER	25MC LLC
PLAT BOOK PAGE	EA-278
DEED BOOK PAGE	1122-265
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

50.5 Feet

Measurement Result

Feet



**EXAMPLES OF PROPERTIES WITH FLOATING DOCK ENTITLEMENT
CREEKS EQUAL OR LESS THAN 105 FEET**

Creek at 245 Eagle Point is 104.7 feet

DATA FROM THE 2025 CHARLESTON COUNTY GIS MAP

	Address	Creek Width
1	14 Terrapin Island Lane	47.5
2	58 Salt Cedar	69.2
3	6 Club Cottage Lane	69.7
4	13 Terrapin Island Lane	71.1
5	7 Club Cottage Lane	74.3
6	53 Salt Cedar	82.6
7	11 Terrapin Island Lane	87.0
8	477 Little Bear Way	89.5
9	372 Helena Court	94.2
10	370 Helena Court	98.7
11	7 Summer Island Way	100.2
12	374 Helena Court	101.3
13	48 Blue Heron Pond	104.8
14	234 Eagle Point	105.9



Selected Parcel

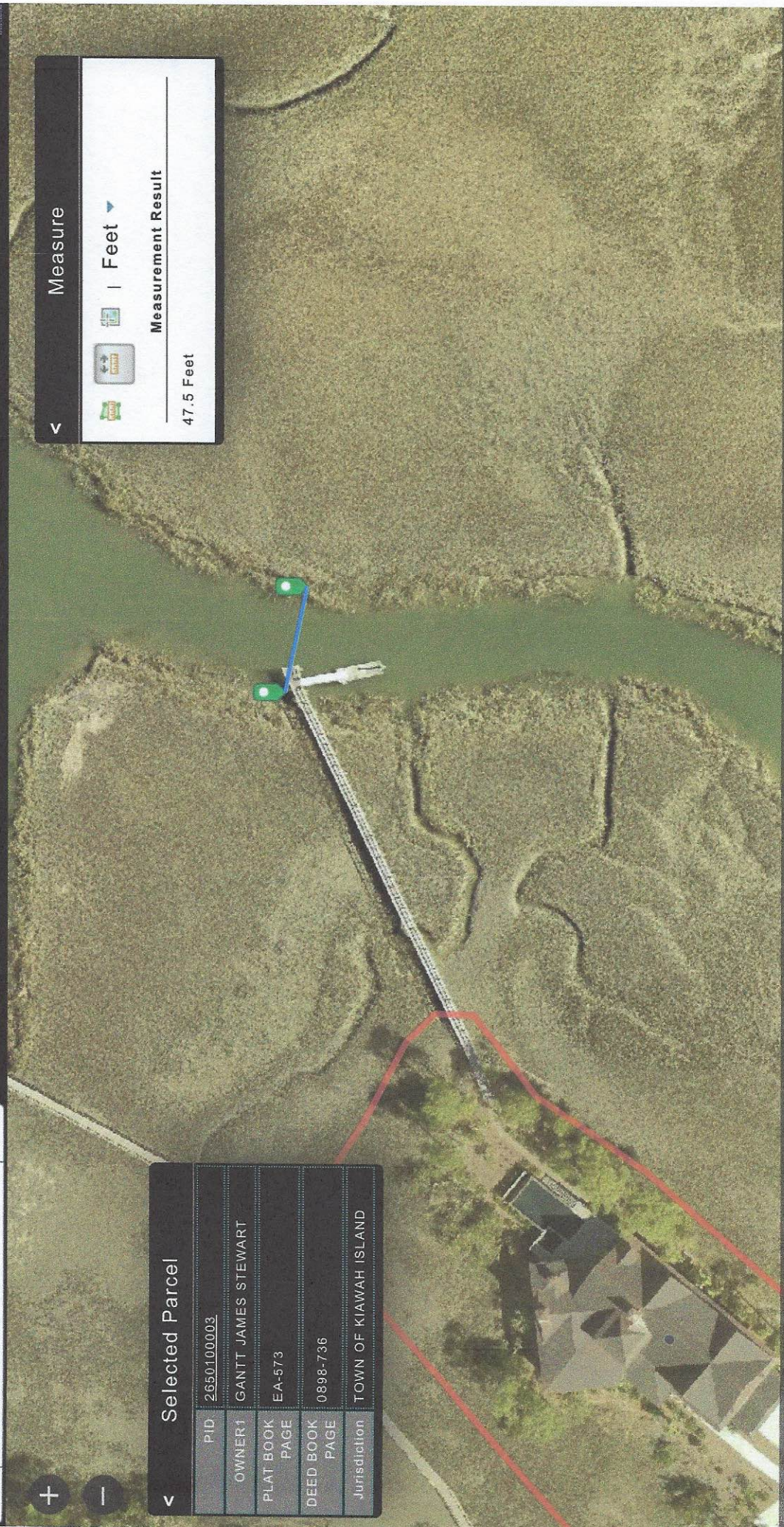
PID	2650100003
OWNER1	GANTT JAMES STEWART
PLAT BOOK PAGE	EA-573
DEED BOOK PAGE	0898-736
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

47.5 Feet





Selected Parcel

PID	2650700015
OWNER	COHN SHARON P
PLAT BOOK PAGE	EA-497
DEED BOOK PAGE	1196-587
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure



Feet

Measurement Result

69.2 Feet





< Selected Parcel

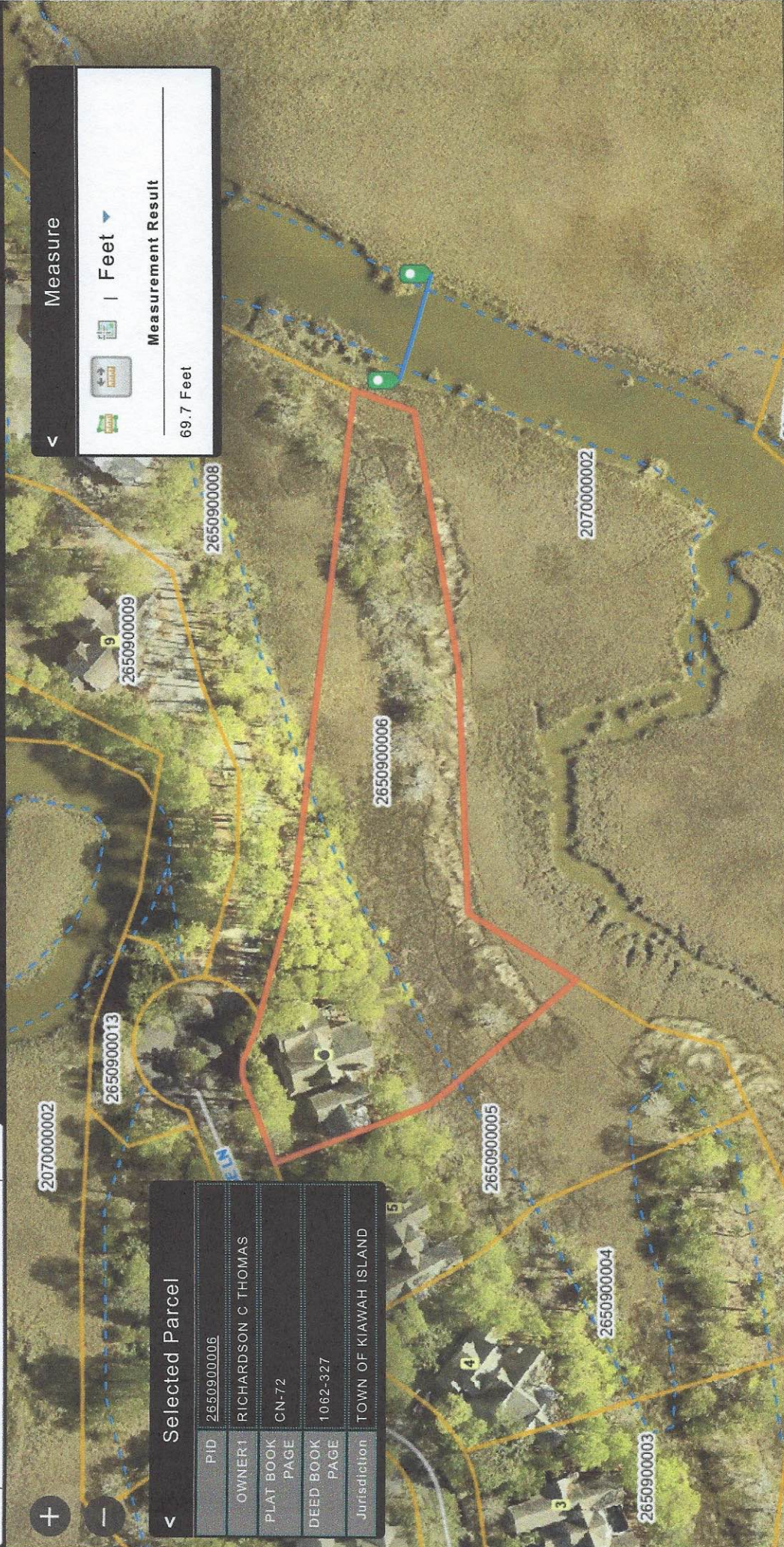
PID	2650900006
OWNER1	RICHARDSON C THOMAS
PLAT BOOK PAGE	CN-72
DEED BOOK PAGE	1062-327
Jurisdiction	TOWN OF KIAWAH ISLAND

< Measure

69.7 Feet

Measurement Result

| Feet





Selected Parcel

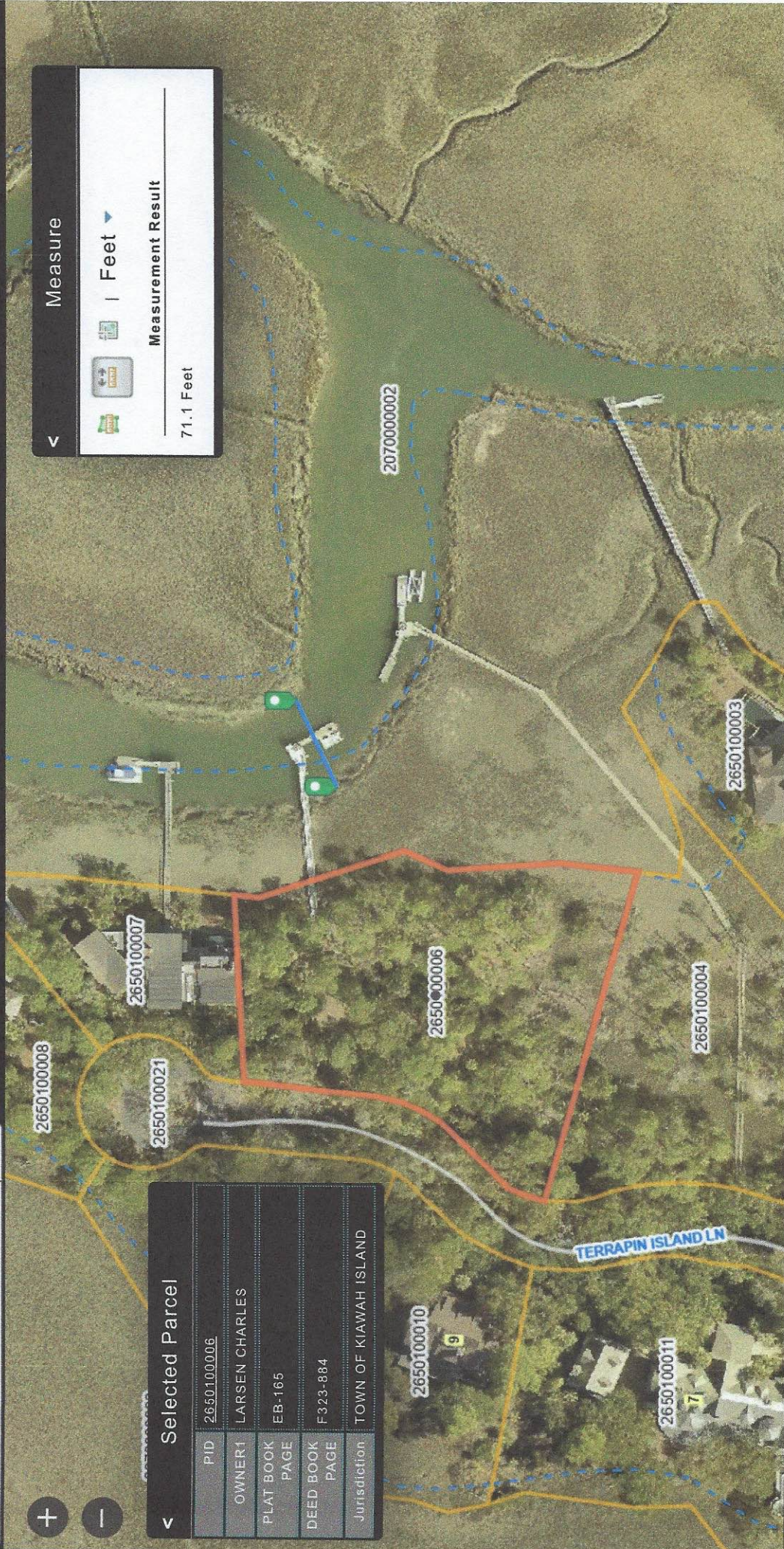
PID	2650100006
OWNER1	LARSEN CHARLES
PLAT BOOK PAGE	EB-165
DEED BOOK PAGE	F-323-884
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

71.1 Feet

Measurement Result

Feet





Selected Parcel

PID	2650900008
OWNER	CRAWFORD JOHN H IV
PLAT BOOK PAGE	L23 - 0424
DEED BOOK PAGE	0834-870
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

74.3 Feet

Measurement Result

Feet



53 SALT CEDAR LANE, JOHNS



Selected Parcel

PID	2650700020
OWNER	HARPOLE LINDA H
PLAT BOOK PAGE	EA-994
DEED BOOK PAGE	1064-836
Jurisdiction	TOWN OF KIAWAH ISLAND

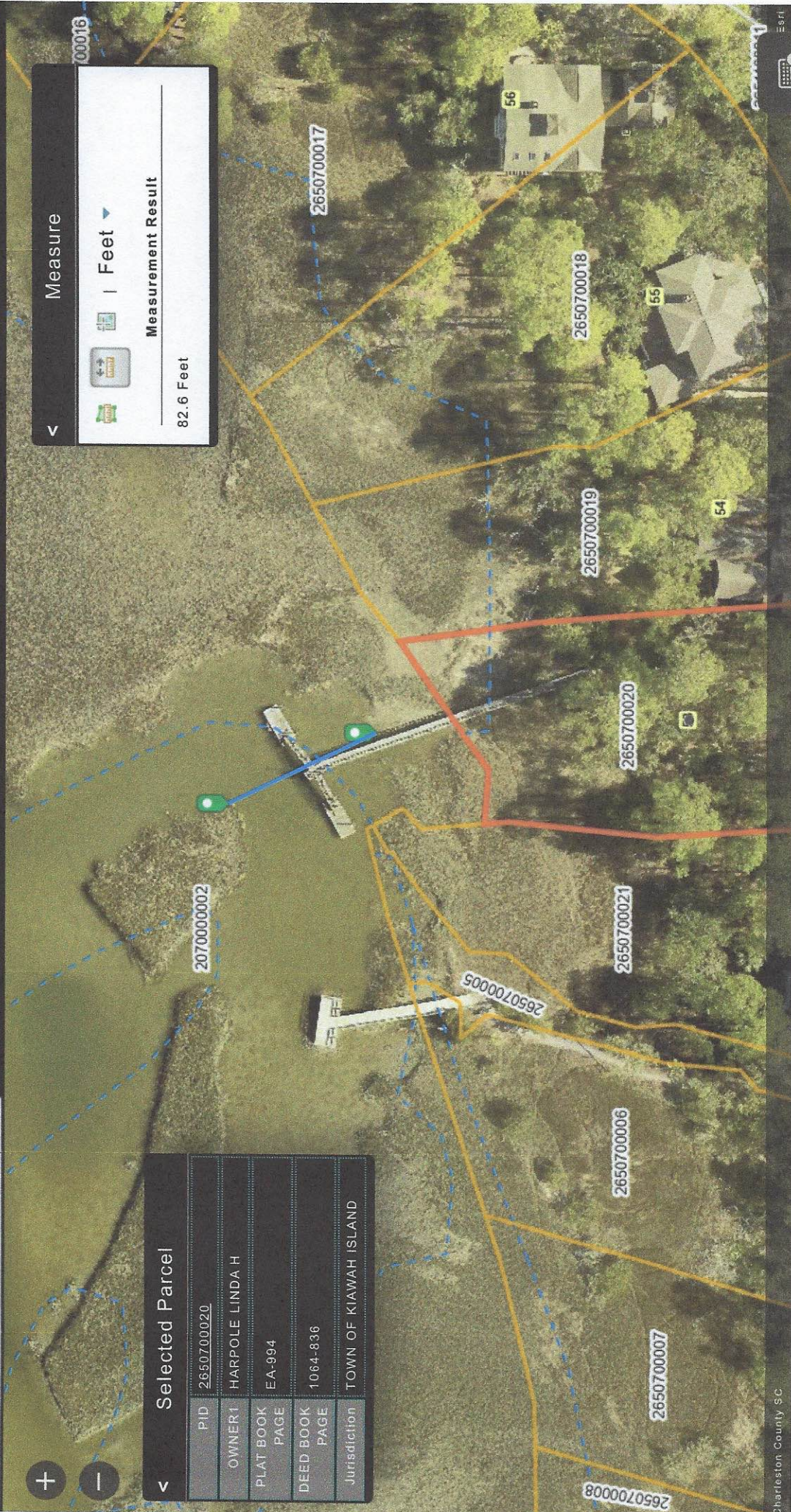
Measure



Feet

Measurement Result

82.6 Feet



11 TERRAPIN ISLAND LANE, JO X



Charleston County GIS Viewer



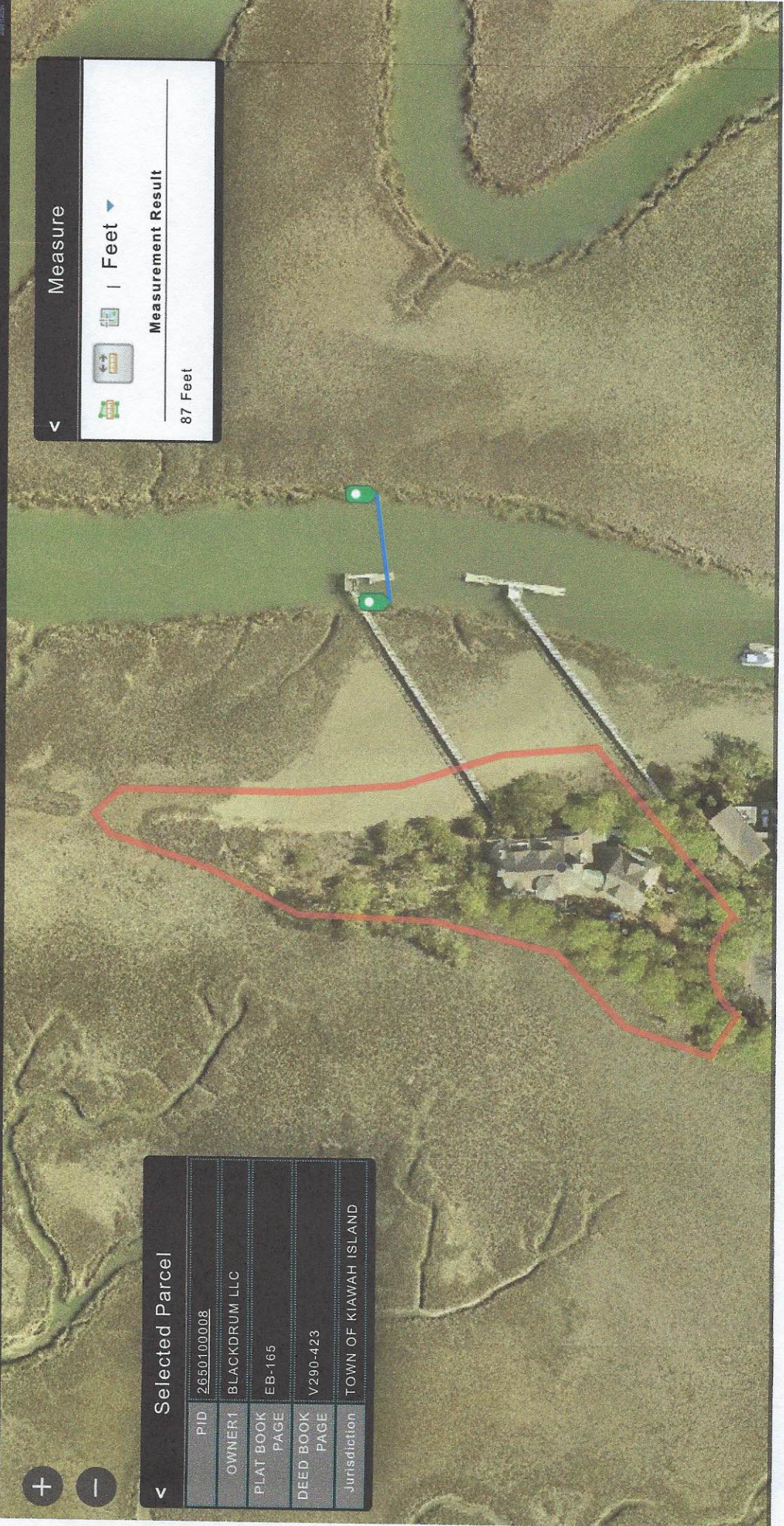
Selected Parcel

PID	2650100008
OWNER1	BLACKDRUM LLC
PLAT BOOK PAGE	EB-165
DEED BOOK PAGE	V290-423
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

87 Feet

Measurement Result



477 LITTLE BEAR WAY, JOHNS X



Measure

89.5 Feet

Measurement Result

Selected Parcel

PID	2651600222
OWNER1	HYE DOON LLC
PLAT BOOK PAGE	L21- 0281
DEED BOOK PAGE	1198-750
Jurisdiction	TOWN OF KIAWAH ISLAND



Selected Parcel

PID	255.1600.167
OWNER1	KIAWAH 372 LLC
PLAT BOOK PAGE	L20- 0262
DEED BOOK PAGE	1200-069
Jurisdiction	TOWN OF KIAWAH ISLAND



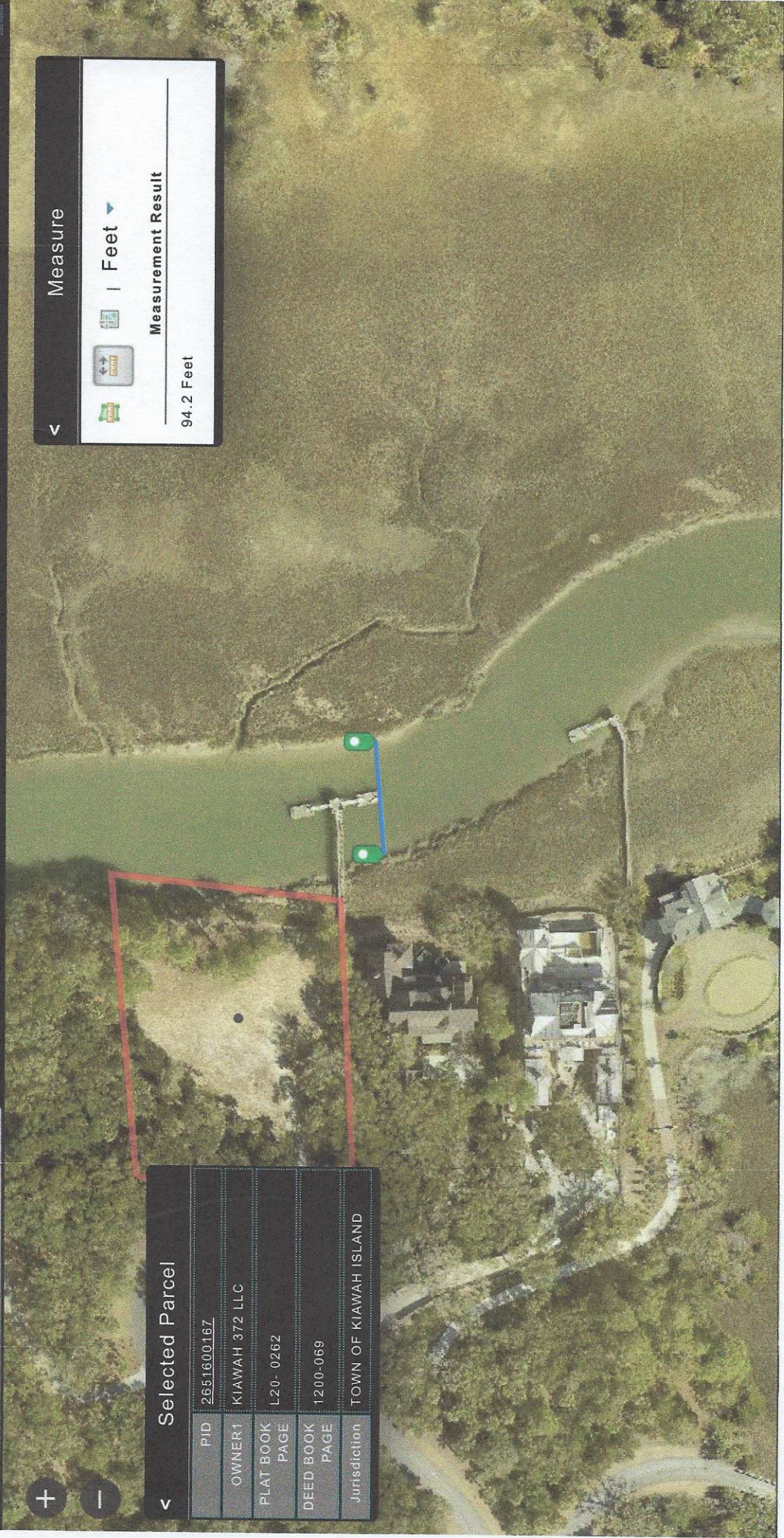
Measure



Feet

Measurement Result

94.2 Feet





Selected Parcel

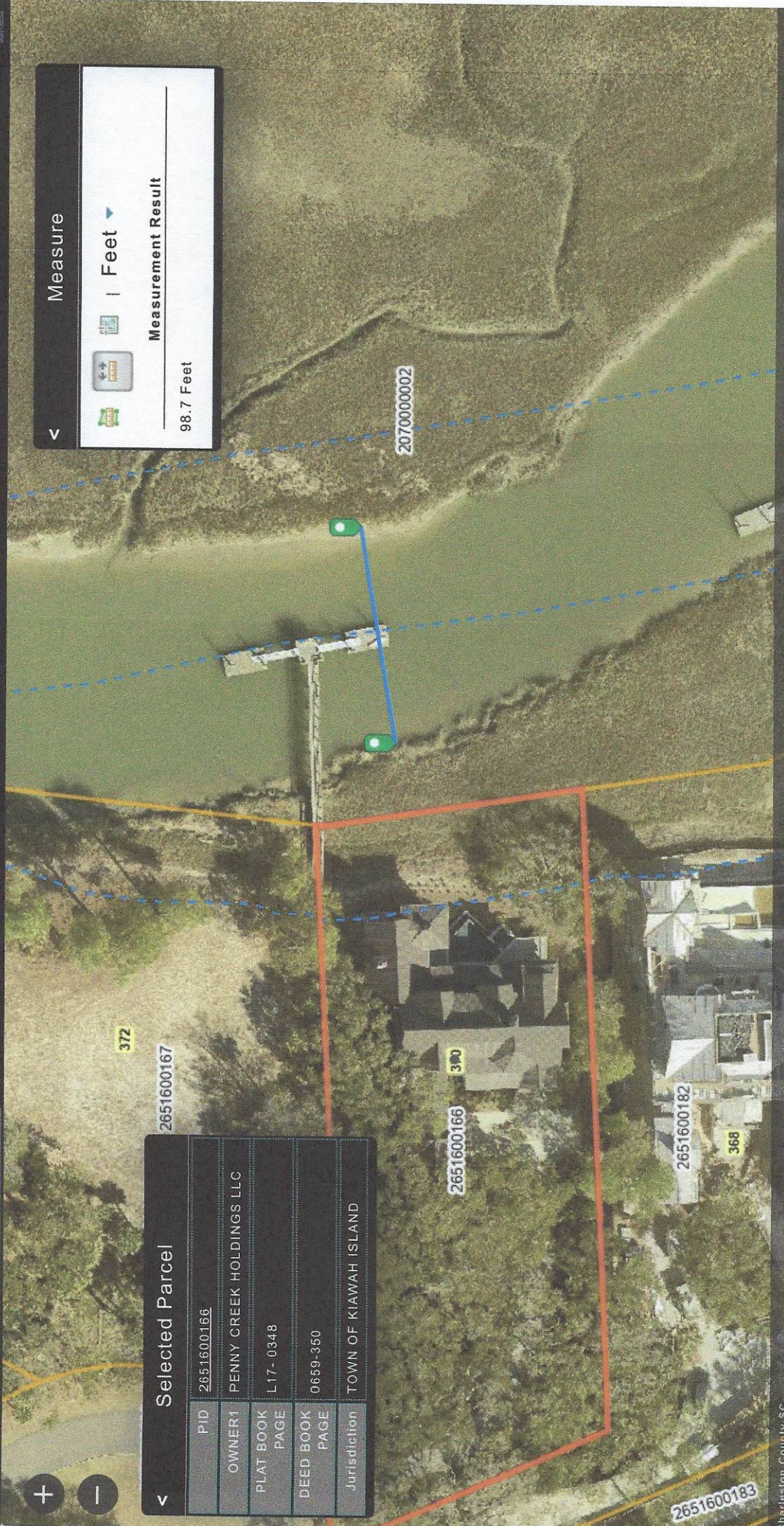
PID	2651600166
OWNER	PENNY CREEK HOLDINGS LLC
PLAT BOOK PAGE	L17 - 0348
DEED BOOK PAGE	0659-350
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

1 Feet

Measurement Result

98.7 Feet





Selected Parcel	
PID	2651100004
OWNER1	AMBROSE FAMILY TRUST
PLAT BOOK PAGE	EC-48
DEED BOOK PAGE	0066-661
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

100.2 Feet

Measurement Result

Feet



374 HELENA COURT, JOHNS IS X



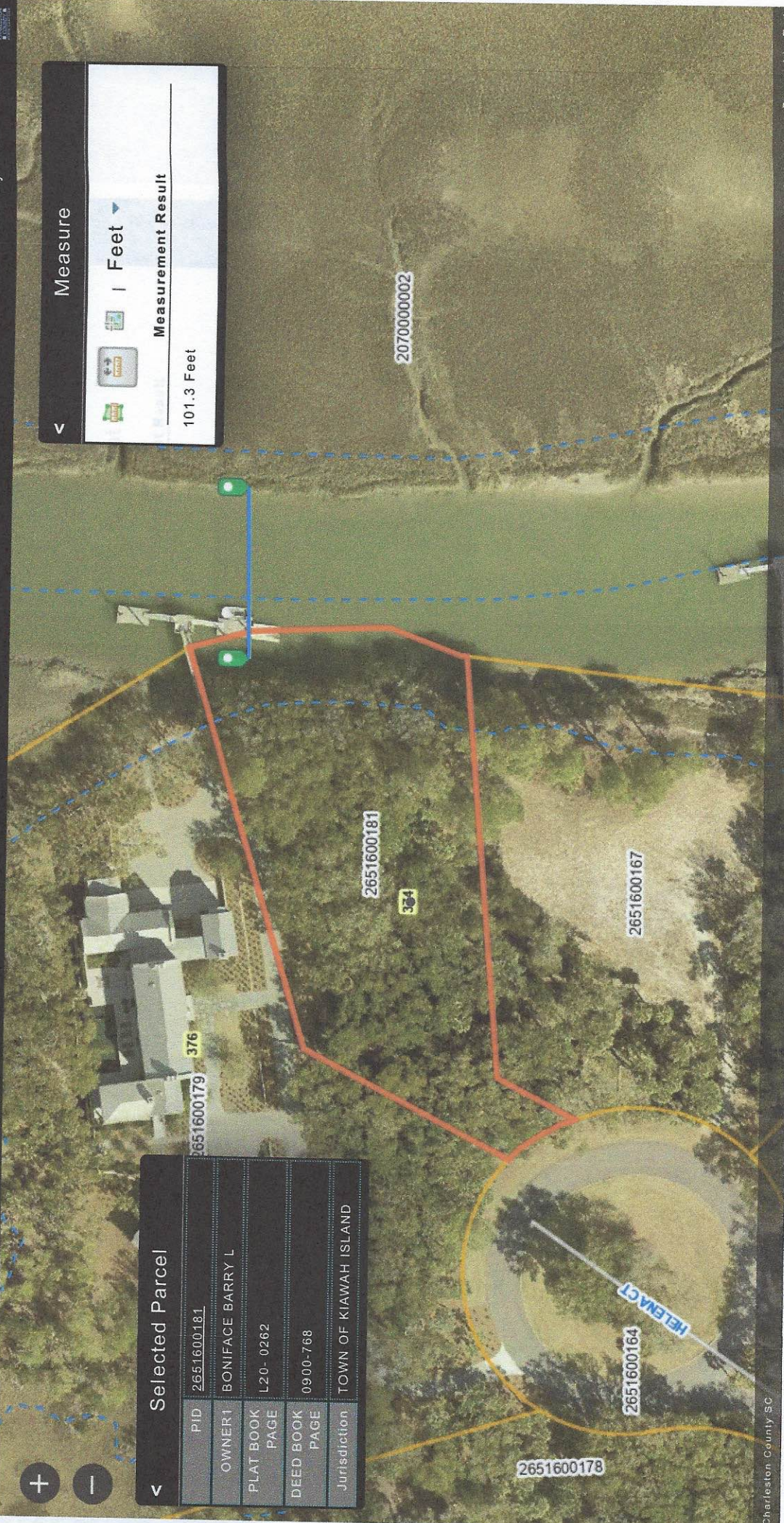
< Selected Parcel

PID	2651600181
OWNER	BONIFACE BARRY L
PLAT BOOK PAGE	L20- 0262
DEED BOOK PAGE	0900-768
Jurisdiction	TOWN OF KIAWAH ISLAND

> Measure

101.3 Feet

Measurement Result





Selected Parcel

PID	2650200139
OWNER1	BRANCA RICHARD
PLAT BOOK PAGE	EF-362
DEED BOOK PAGE	0869-743
Jurisdiction	TOWN OF KIAWAH ISLAND

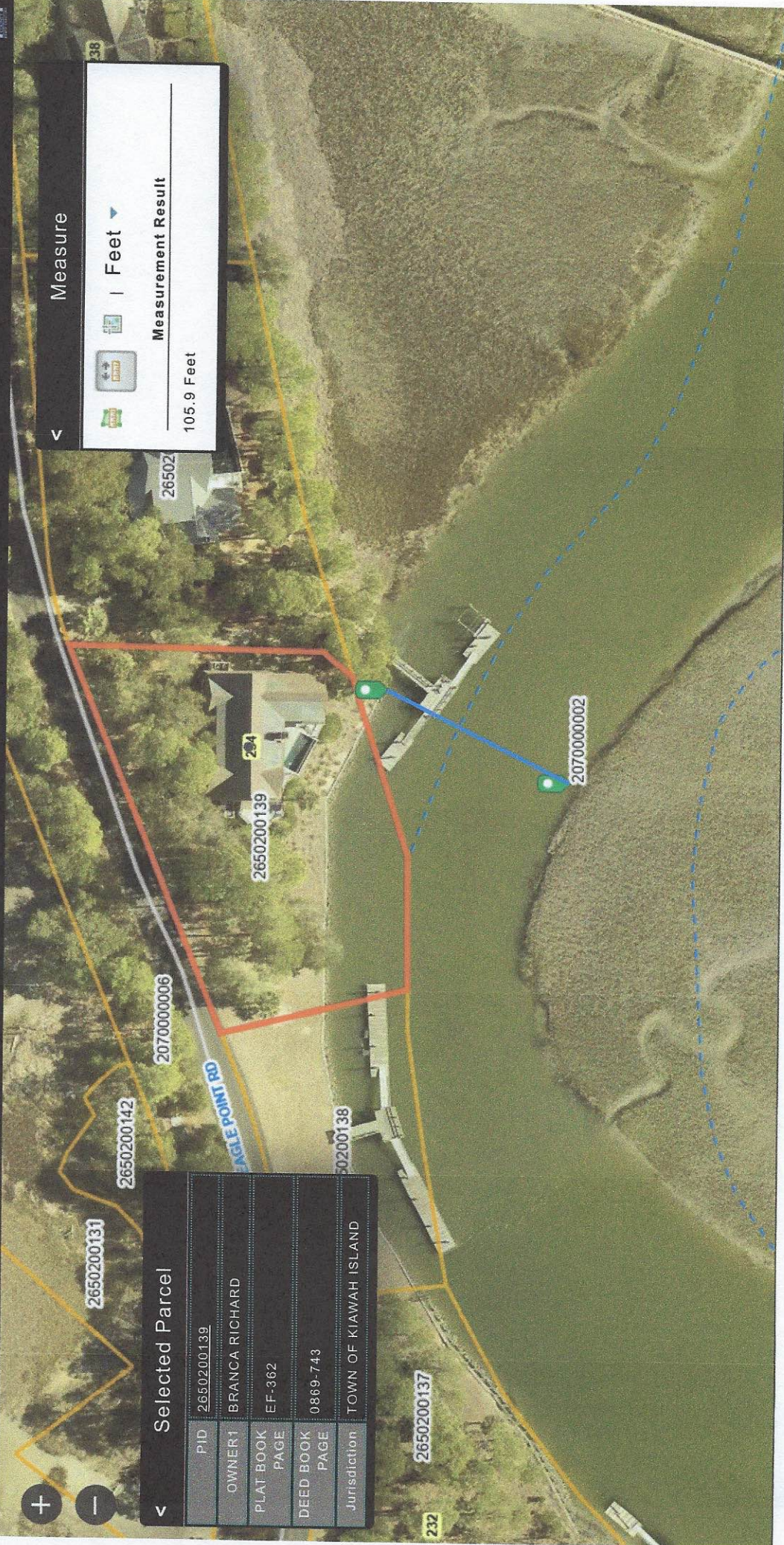
Measure



Feet

Measurement Result

105.9 Feet



APPROVAL CRITERIA FOR CODE TEXT AND ZONING MAP AMENDMENTS:

a. **The proposed amendment is consistent with the purpose and intent of the adopted Town of Kiawah Island Comprehensive Plan:**

Response: The proposed text and map amendment is consistent with the purpose of and intent of the adopted Town of Kiawah Island Comprehensive Plan. Specifically, page V-26 of the Sept. 3, 2019 Amended Comprehensive Plan provides that the purpose of Dock Key Locations Ordinance 2003-05 is to control the location and installation of docks to prevent their uncontrolled proliferation along the Island's river and stream frontage. This proposed amendment is consistent with this purpose because the request does not request any new docks but simply requests a change of designation to be consistent with the application of the Ordinance across the many rivers and creeks of the Island. No new docks will be added. A fixed dock is already in place and this amendment is simply to allow the addition of a floating dock. In addition, the proposed reduction of 636.26 feet of fixed dock entitlement in exchange for only 50 feet of floating dock designation also is consistent with controlling the proliferation of docks. The Ordinance also provides design criteria for docks which are met with a floating dock at the proposed location.

Lastly, SCDES regulations allow for up to 240 sq ft of pierhead to be built on the creek fronting 245 Eagle Point due to no potential access via dockage from the opposite side of the creek (See 30-1(D)(50)). The applicant purposefully built less than entitled in order to minimize the impact on the environment and also minimize the impact on the view of the adjacent property owner. This is consistent with the intent of the Comprehensive Plan to minimize the impact on the Island's river and stream frontage.

b. **The proposed amendment is consistent with the purposes and intent of this article:**

Response: The proposed amendment is consistent with the purposes and intent of this article, specifically Section 12-78, Dock Key Locations and the Key Location Map. The proposed amendment seeks to reclassify a fixed dock for a floating dock in a location where all the design criteria within Section 12-78(b)(6) can be met while seeking to eliminate a portion of a Key Location where a dock would not meet the design criteria. Furthermore, a review of the Key Location Map makes clear the intent was to locate floating docks on larger creeks or waterways with sufficient width and depth to allow for suitable boat mooring without restricting navigation. The proposed amendment is consistent with that intent. The width of the creek on the northwest shoreline of the

property is wider and deeper than many properties already entitled to floating docks. In addition, the Key Location Map makes it clear the intent was to locate fixed piers on creeks that are generally less than 50 feet and boat mooring was not reasonable. The creek on the northwest shoreline of 245 Eagle Point is sufficiently wide enough to meet all the requirements of both the Town and SCDES in terms of a floating dock and also wider than many creeks where floating docks are currently allowed.

c. The purpose of the proposed amendment is to further the general health, safety, and welfare of the Town of Kiawah Island:

Response: The proposed amendment satisfies the above requirement by complying with the goals of the Comprehensive Plan and the Land Use Planning and Zoning Ordinance of the Town of Kiawah Island.

d. The proposed amendment corrects an error or inconsistency or meets the challenge of a changed condition:

Response: The proposed amendment both corrects an error or inconsistency and also meets the challenge of a changed condition. As shown by a review of the 2001 and 2025 Charleston County GIS maps, the creek on the northwest shoreline of the property has clearly widen since 2001. The creek has grown approximately 32% in width from 79.5 feet to 104.7 feet today. It is also significantly wider than what is depicted on the Key Locations Map from 2005. It also corrects an inconsistency in that there are many properties on Kiawah entitled to floating docks that are located on creeks much smaller than the creek here. In addition, a fixed dock location on this property is inconsistent with all other fixed docks in that all are located on creeks no greater than 50 feet in width. This amendment will both correct these inconsistencies and also meet the challenge of a changed geographic condition due to the 32% growth in the creek width. Lastly, the proposed amendment will also make the property consistent zoning amendment granted to the adjacent property at 248 Eagle Point. To not allow this amendment would be inconsistent.

Low Tide

11/1/25

11:00am



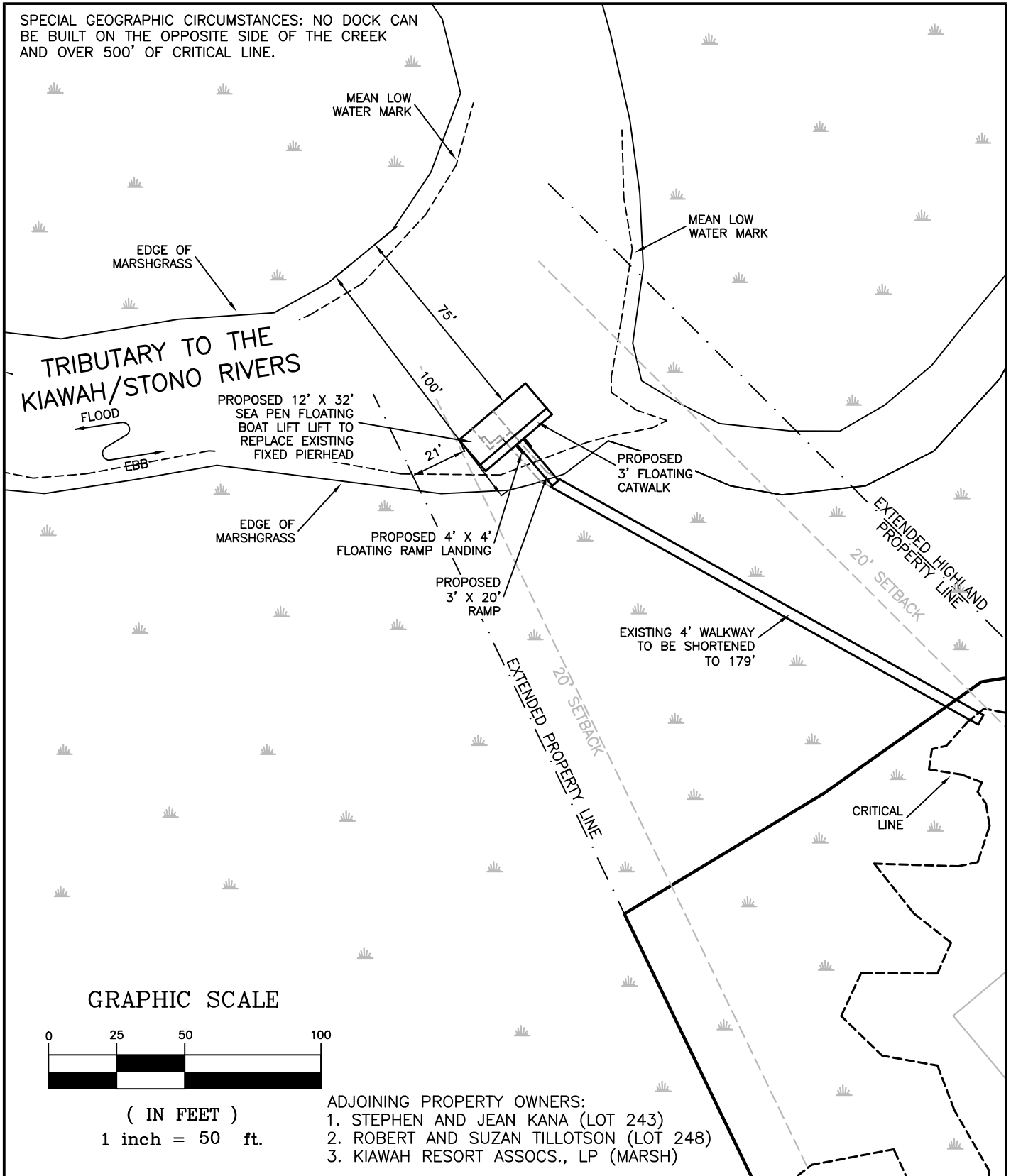
Low Tide

11/1/25

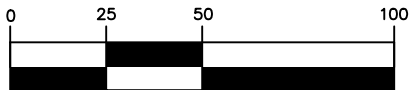
11:00am



SPECIAL GEOGRAPHIC CIRCUMSTANCES: NO DOCK CAN BE BUILT ON THE OPPOSITE SIDE OF THE CREEK AND OVER 500' OF CRITICAL LINE.



GRAPHIC SCALE



(IN FEET)
1 inch = 50 ft.

- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

APPLICATION BY:
JONATHAN WEITZ

ADDRESS: 245 EAGLE POINT RD.

DATE: OCTOBER 23, 2025

REVISED:

LOCATION

A PROPOSED
MODIFICATION OF A
RECREATIONAL DOCK AT
245 EAGLE POINT ROAD
LOCATED ON KIAWAH ISLAND
CHARLESTON COUNTY
SOUTH CAROLINA

SHT. NAME

PLAN
VIEW

TMS #265-02-00-167



TOWN OF KIAWAH ISLAND

ORDINANCE 2026-01

An Ordinance to Amend Chapter 12 – Land Use Planning and Zoning Ordinance Article II. Zoning, Division 2. Zoning Map/Districts. Sec. 12-62. Zoning Map to amend the Key Locations Map to modify the fixed dock designation to allow a floating dock at the subject property 245 Eagle Point Road, Kiawah Island, SC. (TMS# 265-02-00-167)

WHEREAS, the property owner has applied for an amendment to Section 12-78 that would allow a "Floating Dock" rather than a "Fixed Dock"; and

WHEREAS, the Town of Kiawah Island amends the text of Chapter 12 Land Use Planning and Zoning of The Town of Kiawah Island, South Carolina Zoning Ordinance, By Amending Article II, Division 2. Zoning Map/Districts Section 12-78. - Dock Key Locations; and

WHEREAS, the map amendment would be consistent with the purposes and intent of the adopted Comprehensive Plan and would not be detrimental to the public health, safety, and welfare of the Town of Kiawah Island; and

WHEREAS, the Planning Commission held a meeting on December 3, 2025 at which time a presentation was made by staff, and an opportunity was given for the public to comment on the text amendment request; and

WHEREAS, the Planning Commission, after consideration of the staff report, subsequently voted to recommend to Town Council that the proposed amendment be approved; and

WHEREAS, Town Council held a Public Workshop on January 6, 2026 providing the public an opportunity to comment on the proposed amendment.

NOW, THEREFORE, BE IT ORDERED AND ORDAINED BY THE COUNCIL OF THE TOWN OF KIAWAH ISLAND, SOUTH CAROLINA, AND IT IS ORDAINED BY THE AUTHORITY OF SAID COUNCIL.

Section 1 Purpose

The purpose of this Ordinance is to amend Chapter 12 - Land Use Planning and Zoning Ordinance to amend the Key Locations Map to modify the fixed dock designation to allow a floating dock at the subject property 245 Eagle Point Road, Kiawah Island, SC. (TMS# 265-02-00-167)

Section 2 Ordinance

- (1) The Town hereby amends the Key Locations Map the Division 2. Zoning Map/Districts as shown in the attached **“Exhibit A”** which is hereby incorporated herein by reference.

Section 3 Severability

If any part of this Ordinance is held to be unconstitutional, it shall be construed to have been the legislative intent to pass said Ordinance without such unconstitutional provision, and the remainder of

said Ordinance shall be deemed to be valid as if such portion had not been included. If said Ordinance, or any provisions thereof, is held to be inapplicable to any person, group of persons, property, kind property, circumstances or set of circumstances, such holding shall not affect the circumstances or set of circumstances, such holding shall not affect the applicability thereof to any other persons, property, or circumstances.

Section 4 Effective Date and Duration

This Ordinance shall be effective upon its enactment by Town Council for the Town of Kiawah Island.

PASSED, APPROVED, AND ADOPTED BY THE COUNCIL FOR THE TOWN OF KIAWAH ISLAND ON THIS XX DAY OF XXXX, 2026.

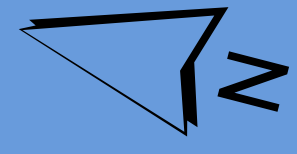
Bradley D. Belt, Mayor

ATTEST:

By: _____
Petra Reynolds, Town Clerk

1st Reading: January 6, 2026

2nd Reading:



Proposed Dock Key Locations Map

Stono River

Bass Creek



36

37

G

16

LEGEND

FLOATING DOCK SITES
 Lot Nos. **21** (red box) INDICATES KEY LOCATION NUMBER DESIGNATOR
 DIRECTION OF FLOATING ELEMENT INDICATED

JOINT FLOATING DOCK SITES
 Lot Nos. **25** (red box) INDICATES KEY LOCATION NUMBER DESIGNATOR

FIXED DOCK SITES
 Lot Nos. **H** (green circle) INDICATES KEY LOCATION LETTER DESIGNATOR

JOINT FIXED DOCK SITES
 Lot Nos. **S** (green circle) INDICATES KEY LOCATION LETTER DESIGNATOR

SHORELINE LENGTH APPROVED FOR FLOATING DOCK SITES
 LINEAR FEET OF SHORELINE APPROVED 1100'
 SHORELINE **35** (red box) INDICATES KEY LOCATION NUMBER DESIGNATOR

SHORELINE LENGTH APPROVED FOR FIXED DOCK SITES
 LINEAR FEET OF SHORELINE APPROVED 250'
 SHORELINE **K** (green circle) INDICATES KEY LOCATION LETTER DESIGNATOR

DELETED KEY LOCATIONS
23 (yellow box) **L** (yellow circle)





TAB 9

TOWN COUNCIL

Agenda Item

Ordinance 2026-01 and Ordinance 2026-02 Materials

Town of Kiawah Island Zoning Ordinance Amendment Request Case REZ25-000001 & AZO25-000014 Case History

Planning Commission Meeting: December 3, 2025
Public Hearing and First Reading: January 6, 2025
Second Reading: TBD

CASE INFORMATION

Applicant: Jonathan and Lisa Weitz

Representative: Mary Shahid

Location: 245 Eagle Point Road

Parcel Identification: 265-02-00-167

Property Size: 1.7 acres

Zoning District: R-1, Residential Zoning.

Key Location Designation: Fixed Dock Location Eagle Point, East – G, Eagle Point

Application: The Applicant is requesting to amend the *Town of Kiawah Island Land Use Planning and Zoning Ordinance* Sec. 12-78 - Dock Key Locations to allow a floating dock for property located at 245 Eagle Point Road. The property currently contains a fixed dock (Key Dock Designation G). The applicant/property owner is requesting this amendment to allow a floating dock (Key Dock Designation 37) for the property. (TMS# 265-02-00-167).

The proposed amendment would add to Table 2N. Town of Kiawah Island Key Locations Floating Docks a new Key Location Designation 37, Eagle Point North, with an authorized shoreline of 50 linear feet, and one authorized floating dock at Lot 245.

The proposed amendment would modify Table 20. Town of Kiawah Island Key Locations Fixed Docks removing a fixed dock for Lot 245 at Key Location Designation G, Eagle Point, East.

Land Use Information: The subject property is currently developed with a single-family residence. The subject property is owned by Jonathan and Lisa Weitz. According to Charleston County Records, the Weitz's purchased the subject property on May 3, 2024. The Town of Kiawah Island identified this property as part of Fixed Dock Key Location G, Eagle Point East, pursuant to Sec. 12-78 – Dock Key Locations in the *Town of Kiawah Island Land Use Planning and Zoning Ordinance*. The Ordinance allows for a fixed dock stretching across properties 245 & 243 Eagle Point of 600 linear feet. The subject property has an existing fixed dock.

The proposed map amendment would modify Sec. 12-62 Zoning Map, the Town of Kiawah Island Key Locations Map (Exhibit 12A-2), mapping the location of the proposed Key Location Designation 37, Eagle Point North, and modifying the existing Key Location Designation G.

The applicant has submitted preliminary permit drawings for a proposed modification of a recreational floating dock located at 245 Eagle Point Road. The proposed drawings include a Sea Pen floating boat lift to replace existing fixed pierhead, and a proposed floating ramp landing.

RECOMMENDATION BY THE PLANNING COMMISSION

Pursuant to §12-158(3) of the *Land Use Planning and Zoning Ordinance* “The Planning Commission shall review the proposed text amendment and/or zoning map amendment and take action, recommending that the Town Council approve or deny the proposed amendment. The Planning Commission may hold a public hearing in accordance with the procedures in section 12-156. The Planning Commission's recommendation shall be based on the approval criteria of subsection (6) of this section. The Planning Commission shall submit its recommendation to the Town Council within 30 working days of the Planning Commission meeting at which the amendment was introduced. A simple majority vote of Planning Commission members present, and voting shall be required to approve the amendment.”

DECISION ON AMENDMENT BY THE TOWN COUNCIL

Pursuant to §12-158(5) of the *Land Use Planning and Zoning Ordinance* “After receiving the recommendation of the Planning Commission, the Town Council shall hold one or more public hearings, and any time after the close of the public hearing, take action to approve, approve with modifications, or deny the proposed amendment based on the approval criteria of subsection (6) of this section. A simple majority vote of Town Council members present, and voting shall be required to approve the amendment. Zoning map amendments shall not be approved with conditions. Prior to action on a proposed code text amendment, the Town Council may, in the exercise of its legislative discretion, invoke the "pending ordinance doctrine" by ordinance so that no building permits shall be issued for structures which would be affected by the proposed amendment until the Town Council has rendered its decision on the proposed amendment.

APPROVAL CRITERIA & APPLICANT'S RESPONSE

Pursuant to §12-158(6) of the *Land Use Planning and Zoning Ordinance*, (6) Approval criteria. Text and zoning map amendments to the ordinance may be approved if the following approval criteria have been met:

a. The proposed amendment is consistent with the purposes and intent of the adopted Town of Kiawah Island Comprehensive Plan;

Applicant's Response: The proposed text and map amendment is consistent with the purpose of and intent of the adopted Town of Kiawah Island Comprehensive Plan. Specifically, page V-26 of the Sept. 3, 2019 Amended Comprehensive Plan provides that the purpose of Dock Key Locations Ordinance 2003-05 is to control the location and installation of docks to prevent their uncontrolled proliferation along the Island's river and stream frontage. This proposed amendment is consistent with this purpose because the request does not request any new docks but simply requests a change of designation to be consistent with the application of the Ordinance across the many rivers and creeks of the Island. No new docks will be added. A fixed dock is already in place and this amendment is simply to allow the addition of a floating dock. In addition, the proposed reduction of 636.26 feet of fixed dock entitlement in exchange for only 50 feet of floating dock designation also is consistent with controlling the proliferation of docks. The Ordinance also provides design criteria for docks which are met with a floating dock at the proposed location.

Lastly, SCDES regulations allow for up to 240 sq ft of pierhead to be built on the creek fronting 245 Eagle Point due to no potential access via dockage from the opposite side of the creek (See 30-1(D)(50). The applicant purposefully built less than entitled in order to minimize the impact on the environment and also minimize the impact on the view of the adjacent property owner. This is consistent with the intent of the Comprehensive Plan to minimize the impact on the Island's river and stream frontage.

b. The proposed amendment is consistent with the purposes and intent of this article;

Applicant's Response: *The proposed amendment is consistent with the purposes and intent of this article, specifically Section 12-78, Dock Key Locations and the Key Location Map. The proposed amendment seeks to reclassify a fixed dock for a floating dock in a location where all the design criteria within Section 12-78(b)(6) can be met while seeking to eliminate a portion of a Key Location where a dock would not meet the design criteria. Furthermore, a review of the Key Location Map makes clear the intent was to locate floating docks on larger creeks or waterways with sufficient width and depth to allow for suitable boat mooring without restricting navigation. The proposed amendment is consistent with that intent. The width of the creek on the northwest shoreline of the property is wider and deeper than many properties already entitled to floating docks. In addition, the Key Location Map makes it clear the intent was to locate fixed piers on creeks that are generally less than 50 feet and boat mooring was not reasonable. The creek on the northwest shoreline of 245 Eagle Point is sufficiently wide enough to meet all the requirements of both the Town and SCDES in terms of a floating dock and also wider than many creeks where floating docks are currently allowed.*

c. The purpose of the proposed amendment is to further the general health, safety and welfare of the Town of Kiawah Island;

Applicant's Response: *The proposed amendment satisfies the above requirement by complying with the goals of the Comprehensive Plan and the Land Use Planning and Zoning Ordinance of the Town of Kiawah Island.*

d. The proposed amendment corrects an error or inconsistency or meets the challenge of a changed condition.

Applicant's Response: *The proposed amendment both corrects an error or inconsistency and also meets the challenge of a changed condition. As shown by a review of the 2001 and 2025 Charleston County GIS maps, the creek on the northwest shoreline of the property has clearly widen since 2001. The creek has grown approximately 32% in width from 79.5 feet to 104.7 feet today. It is also significantly wider than what is depicted on the Key Locations Map from 2005. It also corrects an inconsistency in that there are many properties on Kiawah entitled to floating docks that are located on creeks much smaller than the creek here. In addition, a fixed dock location on this property is inconsistent with all other fixed docks in that all are located on creeks no greater than 50 feet in width. This amendment will both correct these inconsistencies and also meet the challenge of a changed geographic condition due to the 32% growth in the creek width. Lastly, the proposed amendment will also make the property consistent zoning amendment granted to the adjacent property at 248 Eagle Point. To not allow this amendment would be inconsistent.*

PLANNING STAFF REVIEW

#REZ25-000001 | Key Dock Location Map Amendment

Planning staff finds the proposed map amendment **satisfies** the approval criteria pursuant to §12-158(6) and **recommends approval**.

#AZO25-000014 | Key Dock Location Text Amendment

Planning staff finds the proposed text amendment **satisfies** the approval criteria pursuant to §12-158(6) and **recommends approval with the following condition:**

Key Location 37 (Floating Dock designation) is established with an authorized shoreline of 50 linear feet for the subject property and the existing Key Location G (Fixed Dock designation) is reduced from 600 linear feet to 200 linear feet of authorized shoreline.

The current Fixed Dock Key Location G authorizes 600 linear feet of fixed-dock shoreline shared across Lots 245 and 243 Eagle Point Road. This modification maintains the functional dock access historically granted to that parcel while still allowing the applicant at 245 Eagle Point Road to convert to Floating Dock Key Location 37 with an authorized 50 linear feet of shoreline.

PLANNING COMMISSION MEETING DECEMBER 3, 2025

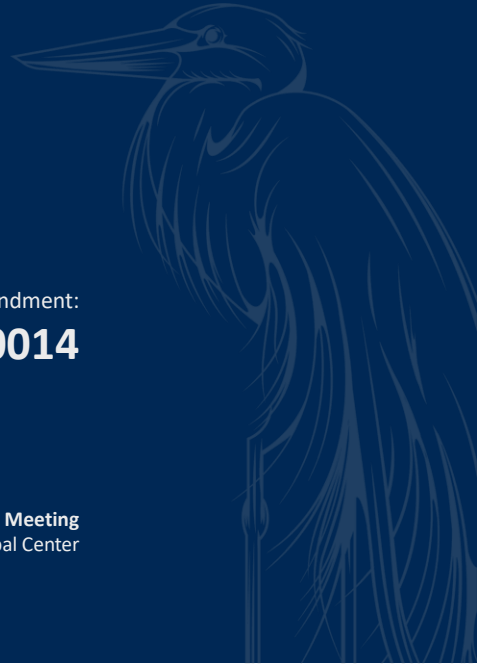
Notifications: Notice of this meeting has been published and posted in accordance with the Freedom of Information Act and the requirements of the Town of Kiawah Island.

The property owner Mr. Weitz and the applicant's representative Mary Shahid responded to Commissioners questions regarding potential impacts, by explaining that the proposed plan involves completely removing the 100-foot pier head plus an additional 35 feet of elevated walkway, which would allow access to the water for boat storage or kayaking while also reducing the visual impact on neighbors. They also clarified that the change would actually be less impactful than the current dock, as it would remove multiple pilings, shorten the walkway, and the floating portion would never touch the bottom at low tide. The floating dock would also include a "sea pen" structure that would contain boats and prevent leaks from affecting the environment.

At its December 3, 2025 meeting, the Planning Commission voted 6-1 to recommend approval of both proposed amendments. The Commission recommended approval including conditions recommended by staff for case #AZO25-000014: Key Location 37 (Floating Dock designation) is established with an authorized shoreline of 50 linear feet for the subject property and the existing Key Location G (Fixed Dock designation) is reduced from 600 linear feet to 200 linear feet of authorized shoreline.

TOWN COUNCIL PUBLIC HEARING & MEETING JANUARY 6, 2026

Notifications: Notice of this meeting has been published and posted in accordance with the Freedom of Information Act and the requirements of the Town of Kiawah Island.



Zoning Map & Text Amendment:
#REZ25-000001 & #AZO25-000014

Planning Commission Meeting
December 3, 2025 | Kiawah Island Municipal Center

1



**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

APPLICATION REQUEST(S):

1) #REZ25-000001 | Key Dock Location Map Amendment

Request to amend Sec. 12-62. Zoning Map to amend the Key Locations Map to modify the fixed dock designation to allow a floating dock at the subject property.


2) #AZO25-000014 | Key Dock Location Text Amendment

Request to amend Section 12-78. Dock Key Locations to modify the fixed dock designation to allow a floating dock at the subject property.

APPLICANT / PROPERTY OWNER:	Jonathan and Lisa Weitz
REPRESENTATIVE:	Mary Shahid
SUBJECT PROPERTY:	245 Eagle Point Road
PARCEL IDENTIFICATION:	265-02-00-167
PROPERTY SIZE:	1.7 acres
ZONING DISTRICT:	R-1, Residential Zoning
KEY LOCATION DESIGNATION:	Fixed Dock Location Eagle Point East – G

2

2



**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

3

ZONING ORDINANCE:

Pursuant to **Sec. 12-78. - Dock key locations.**, “Key locations are specific shoreline and marsh sites where floating and fixed docks are permitted to be constructed. The purpose and intent of this key location zoning is to strictly control location and installation of all docks, floating and fixed, so as to prevent their uncontrolled proliferation along Kiawah Island’s river and stream frontage.”

Two dock types: **Fixed Docks:** Dock sites identified by letters and are generally **intended for fishing and crabbing and have no movable parts to them.** **Floating Docks:** Dock sites identified by numbers are predesignated to be floating docks. These have a **separate floating pontoon or platform attached to them, which rises and falls with the tides.** Floating docks are suitable for mooring small watercraft.


TOKI Key Terms:

Dock means a structure extending into or upon a waterway, marshland or other natural water feature that provides docking space for ten boats or less.

Fixed Dock means a structure that can either be a portion of a dock that does not float, but is fixed, e.g., the walkway and pierhead, or it is the fixed pierhead which is the deck area at the end of a walkway.

Floating Dock means a structure that is part of a pier or dock that floats and provides easy access to moored boats.

3



**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

4

CASE INFORMATION:

The applicant is requesting to amend the Town of Kiawah Island Land Use Planning and Zoning Ordinance, Article II - Zoning, Division 2. – Zoning Map/Districts, Sec. 12-62. Zoning Map – Key Location Map and Sec. 12-78 - Dock Key Locations **to allow a floating dock** for property located at 245 Eagle Point Road.

The subject property is currently developed with a single-family residence constructed in 2009. The **subject property currently contains a fixed dock** as allowed pursuant to Table 20. Town of Kiawah Island Key Locations Fixed Docks under Key Dock Designation G, Eagle Point, East. The existing dock is a fixed dock containing a 4’ x 221’ walkway and pierhead. The existing dock was permitted January 28, 2025.

The subject property was issued a violation on Sept. 19, 2025, regarding the installation of a Slide Moor system to the fixed dock. On Sept. 24th, the violation was corrected by the property owner.

The applicant has submitted preliminary permit drawings for a proposed modification of a recreational floating dock located at 245 Eagle Point Road. The proposed drawings include a Sea Pen floating boat lift to replace existing fixed pierhead, a proposed floating ramp landing.

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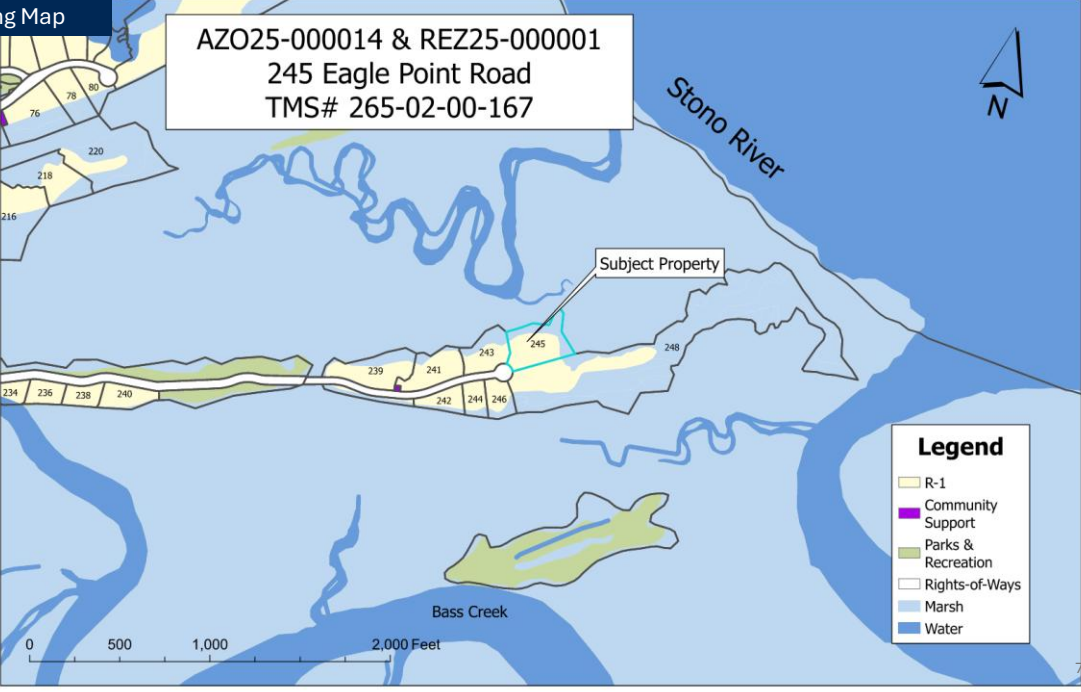
Aerial



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Zoning Map

AZO25-000014 & REZ25-000001
 245 Eagle Point Road
 TMS# 265-02-00-167



7

Site Photos



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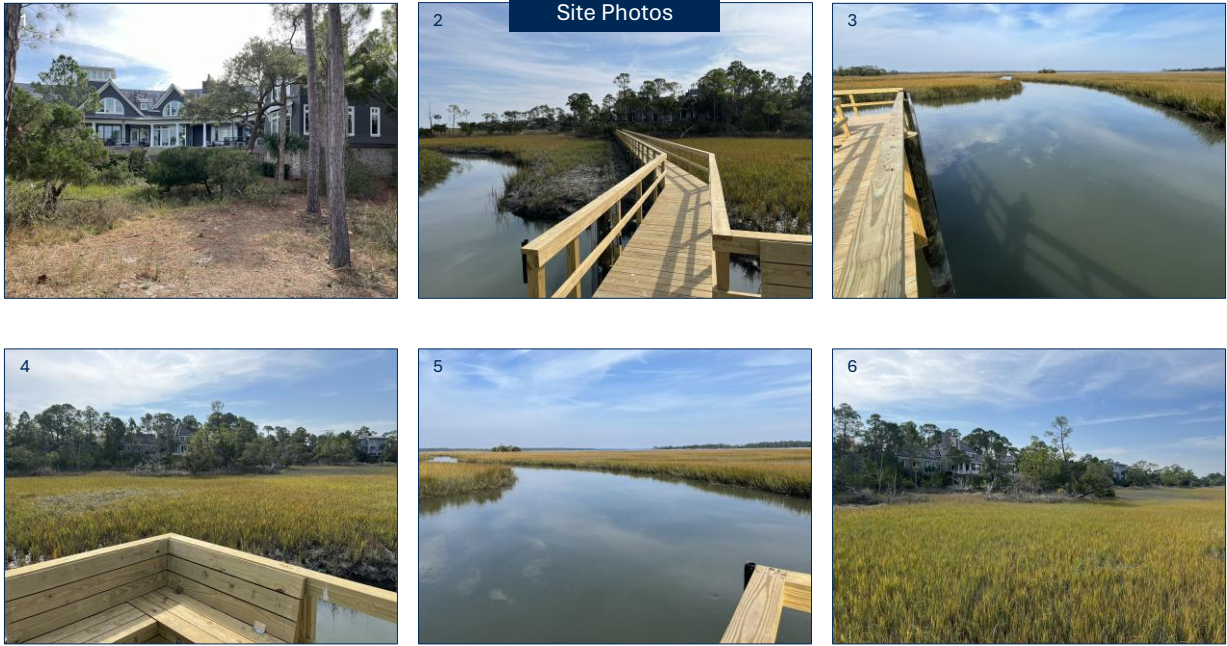
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Site Photos



9

9



10

10

Zoning Map & Text Amendment Request(s):
 #REZ25-000001 &
 #AZO25-000014

Subject Property:
 245 Eagle Point Road, Kiawah Island
 TMS# 265-02-00-167

APPLICATION REQUESTS:

The proposed amendment would add a new floating dock Key Location to Table 2N. Town of Kiawah Island Key Locations Floating Docks.

- Designation 37 - Eagle Point North (Lot 245)

The proposed amendment would eliminate the fixed dock designation for Lot 245. modify Table 2O. Town of Kiawah Island Key Locations Fixed Docks.

- Designation G – Eagle Point, East

Table 2N. Town of Kiawah Island Key Locations Floating Docks

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
36	Eagle Point East		1	Lot 248
37	Eagle Point North		1	Lot 245

Table 2O. Town of Kiawah Island Key Locations Fixed Docks

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
G	Eagle Point, East	600	1	Lot 245

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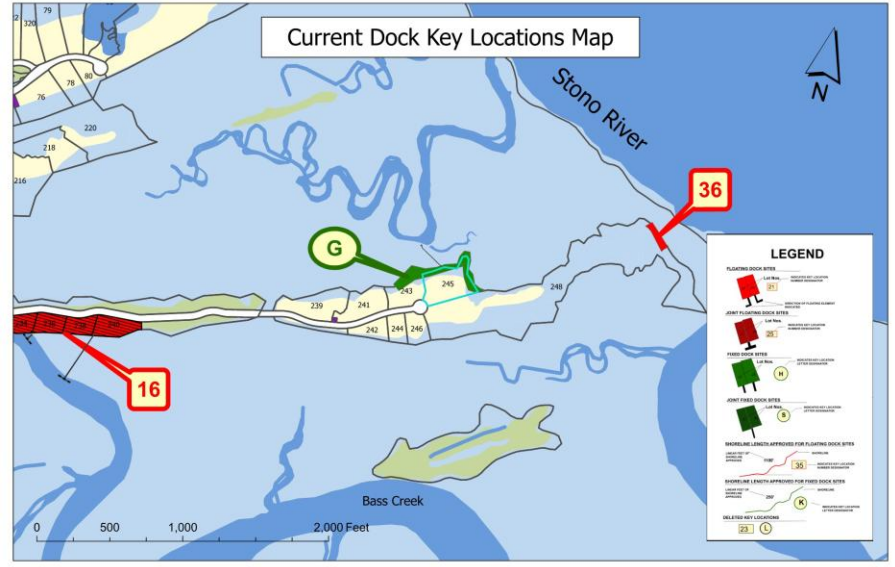
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Zoning Map & Text Amendment Request(s): #REZ25-000001 & #AZO25-000014

Subject Property: 245 Eagle Point Road, Kiawah Island TMS# 265-02-00-167

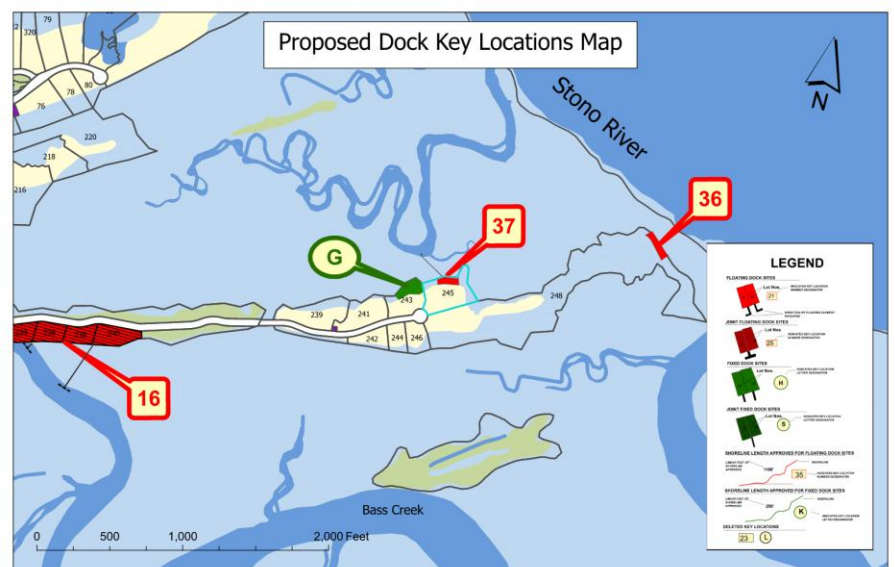
KEY LOCATION MAP EXHIBIT:



Zoning Map & Text Amendment Request(s): #REZ25-000001 & #AZO25-000014

Subject Property: 245 Eagle Point Road, Kiawah Island TMS# 265-02-00-167

KEY LOCATION MAP EXHIBIT:



Aerial



14



RECOMMENDATION BY THE PLANNING COMMISSION:

Pursuant to §12-158(3) of the Land Use Planning and Zoning Ordinance “The Planning Commission shall review the proposed text amendment and/or zoning map amendment and take action, **recommending that the Town Council approve or deny the proposed amendment.** The Planning Commission may hold a public hearing in accordance with the procedures in section 12-156. The Planning Commission's recommendation shall be based on the approval criteria of subsection (6) of this section. The Planning Commission shall submit its recommendation to the Town Council within 30 working days of the Planning Commission meeting at which the amendment was introduced. A simple majority vote of Planning Commission members present, and voting shall be required to approve the amendment.”

15

15



DECISION ON AMENDMENT BY THE TOWN COUNCIL:

Pursuant to §12-158(5) of the Land Use Planning and Zoning Ordinance “After receiving the recommendation of the Planning Commission, the Town Council shall hold one or more public hearings, and any time after the close of the public hearing, **take action to approve, approve with modifications, or deny the proposed amendment based on the approval criteria** of subsection (6) of this section. A simple majority vote of Town Council members present, and voting shall be required to approve the amendment. Zoning map amendments shall not be approved with conditions.

Prior to action on a proposed code text amendment, the Town Council may, in the exercise of its legislative discretion, invoke the "pending ordinance doctrine" by ordinance so that no building permits shall be issued for structures which would be affected by the proposed amendment until the Town Council has rendered its decision on the proposed amendment.

16

16




APPROVAL CRITERIA:

Pursuant to §12-158(6) of the Land Use Planning and Zoning Ordinance “Text and zoning map amendments to the ordinance may be approved if the following approval criteria have been met:

- a. The proposed amendment is consistent with the purposes and intent of the adopted Town of Kiawah Island Comprehensive Plan;
- b. The proposed amendment is consistent with the purposes and intent of this article;
- c. The purpose of the proposed amendment is to further the general health, safety and welfare of the Town of Kiawah Island; and
- d. The proposed amendment corrects an error or inconsistency or meets the challenge of a changed condition.”

17

17



**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

PLANNING STAFF REVIEW:

1) #REZ25-000001 | Key Dock Location Map Amendment
Request to amend Sec. 12-62. Zoning Map to amend the Key Locations Map to modify the fixed dock designation to allow a floating dock at the subject property.

Planning staff finds the proposed map amendment satisfies the approval criteria pursuant to §12-158(6) and recommends approval.

2) #AZO25-000014 | Key Dock Location Text Amendment
Request to amend Section 12-78. Dock Key Locations to modify the fixed dock designation to allow a floating dock at the subject property.

Planning staff finds the proposed text amendment satisfies the approval criteria pursuant to §12-158(6) and recommends approval with the following condition:

Key Location 37 (Floating Dock designation) is established with an authorized shoreline of 50 linear feet for the subject property and the existing **Key Location G** (Fixed Dock designation) is reduced from 600 linear feet to 200 linear feet of authorized shoreline.



**Planning
Commission
Recommendation**

**Zoning Map & Text
Amendment Request(s):**
#REZ25-000001 &
#AZO25-000014

Subject Property:
245 Eagle Point Road, Kiawah Island
TMS# 265-02-00-167

Planning Commission Recommendation:

The Planning Commission voted 6-1 to recommend approval of both proposed amendments. The Commission recommended approval including conditions recommended by staff #AZO25-000014: Key Location 37 (Floating Dock designation) is established with an authorized shoreline of 50 linear feet for the subject property and the existing Key Location G (Fixed Dock designation) is reduced from 600 linear feet to 200 linear feet of authorized shoreline.

Table 2N. Town of Kiawah Island Key Locations Floating Docks

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
36	Eagle Point East		1	Lot 248
37	Eagle Point North	50	1	Lot 245

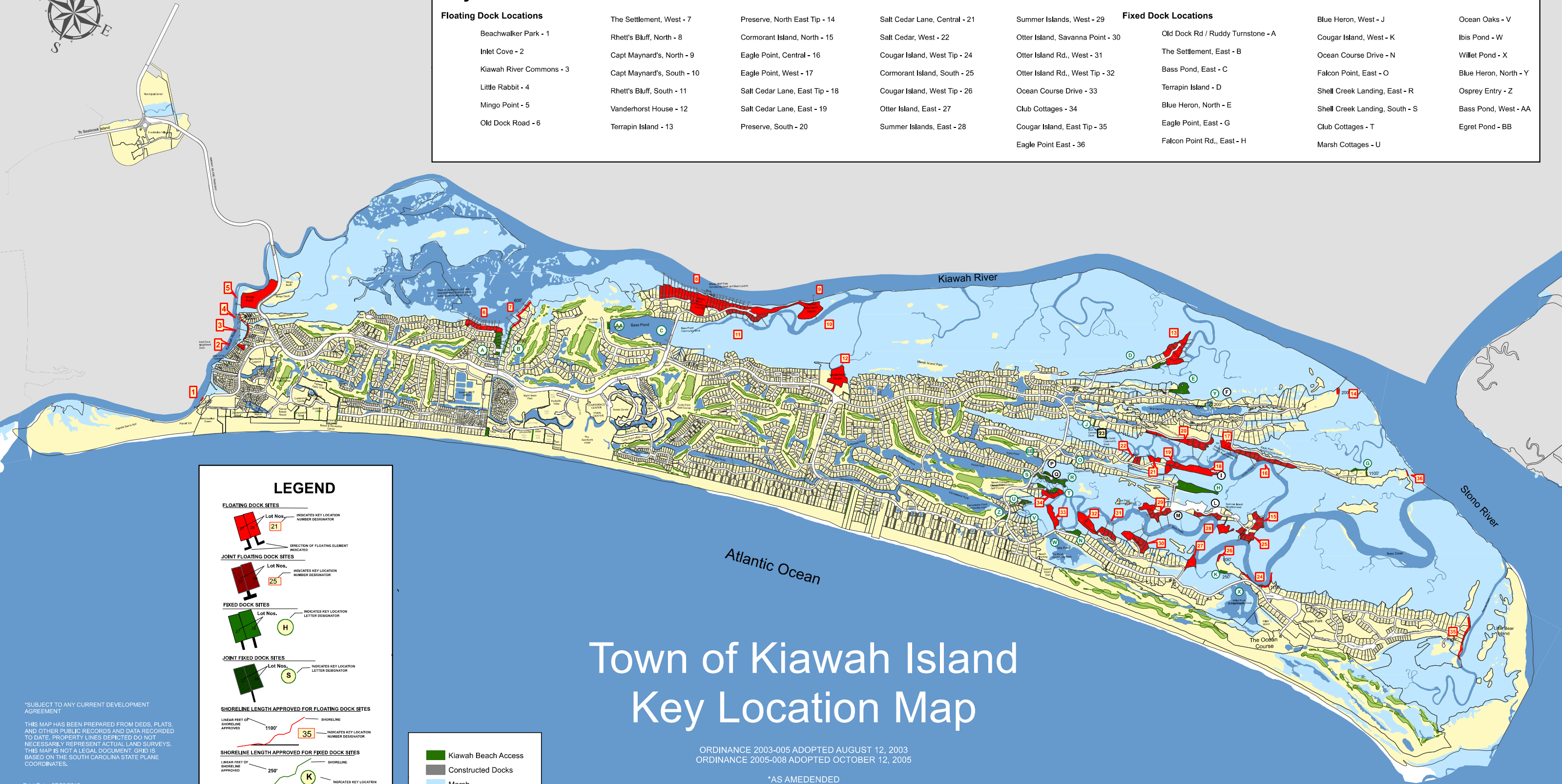
Table 2O. Town of Kiawah Island Key Locations Fixed Docks

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
G	Eagle Point, East	600-200	1	Lot 245



Key Locations

Floating Dock Locations				Fixed Dock Locations			
Beachwalker Park - 1	Rhett's Bluff, North - 8	Preserve, North East Tip - 14	Salt Cedar Lane, Central - 21	Summer Islands, West - 29	Old Dock Rd / Ruddy Turnstone - A	Blue Heron, West - J	Ocean Oaks - V
Inlet Cove - 2	Capt Maynard's, North - 9	Cormorant Island, North - 15	Salt Cedar, West - 22	Otter Island, Savanna Point - 30	The Settlement, East - B	Cougar Island, West - K	Ibis Pond - W
Kiawah River Commons - 3	Capt Maynard's, South - 10	Eagle Point, Central - 16	Cougar Island, West Tip - 24	Otter Island Rd., West - 31	Bass Pond, East - C	Ocean Course Drive - N	Willet Pond - X
Little Rabbit - 4	Rhett's Bluff, South - 11	Eagle Point, West - 17	Cormorant Island, South - 25	Otter Island Rd., West Tip - 32	Terrapin Island - D	Falcon Point, East - O	Blue Heron, North - Y
Mingo Point - 5	Vanderhorst House - 12	Salt Cedar Lane, East Tip - 18	Cougar Island, West Tip - 26	Ocean Course Drive - 33	Blue Heron, North - E	Shell Creek Landing, East - R	Osprey Entry - Z
Old Dock Road - 6	Terrapin Island - 13	Salt Cedar Lane, East - 19	Otter Island, East - 27	Club Cottages - 34	Eagle Point, East - G	Shell Creek Landing, South - S	Bass Pond, West - AA
		Preserve, South - 20	Summer Islands, East - 28	Cougar Island, East Tip - 35	Falcon Point Rd., East - H	Club Cottages - T	Egret Pond - BB
				Eagle Point East - 36		Marsh Cottages - U	



LEGEND

FLOATING DOCK SITES
 Lot Nos. 21 indicates key location number designator.
 DIRECTION OF FLOATING ELEMENT INDICATED

JOINT FLOATING DOCK SITES
 Lot Nos. 25 indicates key location number designator.

FIXED DOCK SITES
 Lot Nos. H indicates key location letter designator.

JOINT FIXED DOCK SITES
 Lot Nos. S indicates key location letter designator.

SHORELINE LENGTH APPROVED FOR FLOATING DOCK SITES
 LINEAR FEET OF SHORELINE APPROVED 1100' SHORELINE
 Lot Nos. 35 indicates key location number designator.

SHORELINE LENGTH APPROVED FOR FIXED DOCK SITES
 LINEAR FEET OF SHORELINE APPROVED 250' SHORELINE
 Lot Nos. K indicates key location letter designator.

DELETED KEY LOCATIONS
 Lot Nos. 23 L

- Kiawah Beach Access
- Constructed Docks
- Marsh
- Water

Town of Kiawah Island Key Location Map

ORDINANCE 2003-005 ADOPTED AUGUST 12, 2003
 ORDINANCE 2005-008 ADOPTED OCTOBER 12, 2005

*AS AMENDED



*SUBJECT TO ANY CURRENT DEVELOPMENT AGREEMENT
 THIS MAP HAS BEEN PREPARED FROM DEEDS, PLATS, AND OTHER PUBLIC RECORDS AND DATA RECORDED TO DATE. PROPERTY LINES DEPICTED DO NOT NECESSARILY REPRESENT ACTUAL LAND SURVEYS. THIS MAP IS NOT A LEGAL DOCUMENT. GRID IS BASED ON THE SOUTH CAROLINA STATE PLANE COORDINATES.
 Print Date: 07/03/2019
 File: TOKI_GIS_KEYLOCATIONMASTER
 Town of Kiawah Island
 Community Development Department
 Zoning & Planning
 Prepared By: JWTJ

Mary D. Shahid
Direct (843) 720-1788
Fax 8434148242
Email mshahid@maynardnexsen.com



October 31, 2025

John W. Taylor, Jr.
Town of Kiawah Island Planning Department
4475 Betsy Kerrison Parkway
Kiawah Island, South Carolina 29455

Re: 245 Eagle Point Road
Kiawah Island, South Carolina 29455
Request for Key Location Zoning Text and Map Amendment
Letter of Intent

Dear John:

This firm represents Jonathan and Lisa Weitz, owners of the above referenced property, in their efforts to seek a zoning text and map amendments to the Town's Zoning Ordinance requesting a change from Key Location G to a new Floating Dock location 37 in order to allow a floating dock and/or boat mooring on the approximately 104 feet wide creek adjacent to the property. If approved, the Weitz's would like to remove the existing fixed pier and approximately 25 feet of elevated walkway and replace it with a gangway to a floating dock.

As background for this request, the Weitz's purchased this property on May 3, 2024. The Town of Kiawah Island identified this property as part of Fixed Dock Key Location G pursuant to Ordinances 2003-005 and 2005-008. I am attaching a copy of the Key Locations Map from 2005 which shows 245 Eagle Point as part of Key Location G.

In 2018, the Town of Kiawah Island unanimously granted a zoning text and map amendment to 248 Eagle Point (immediately adjacent to 245 Eagle Point). This amendment removed 248 from Key Location G and created Floating Dock Location 36 based on a finding of a change in geographic conditions and the inability to permit a dock in the designated location under the Town's regulations. The factual basis for 245 Eagle Point's current request are nearly identical.

The northwestern property line of 245 Eagle Point fronts a large creek measuring between 90 and 104 feet wide at two different points adjacent to 245 Eagle Point. Upon review of the Charleston County GIS maps from 2001, this creek previously measured between 54 and 79 feet at the same locations adjacent to 245 Eagle Point. It is clear from comparing the 2001 and 2025 GIS maps, that this creek has become substantially wider than it was when the Key Location Map was adopted in 2005. It is also substantially wider than what is depicted on Key Location Map. Additionally, the water level in this creek at the existing fixed dock location ranges from 12 feet

(mean high water) to 6 feet (mean low water). This is significantly deeper than many other areas on Kiawah currently zoned for floating docks. Pictures at high and low tide attached.

The Eastern property line fronts a small tributary measuring between 12-15 feet wide and is therefore not a permissible dock location under SCDES regulations, nor the Town. SCDES requires a minimum creek width of 20 feet and the Town requires a minimum width of 25 feet.

Additionally, the Key Location Map currently allows floating docks on numerous creeks less than 104 feet (some significantly less). I have attached several examples based on a review of the 2025 Charleston County GIS Map. Furthermore, all fixed dock locations on creeks (not lagoons or ponds) appear to be on creeks that are 50 feet or less. Rezoning of 245 Eagle Point to a floating dock location would make it consistent with other Key Locations on Kiawah Island.

In December of 2024, the Weitz's began the process of designing a fixed pier dock significantly smaller than they are currently entitled to in an attempt to minimize the view impact on the adjacent property owner. SCDES regulations allow for a 240 sq ft pierhead (SCDES Regs 30-1(D)(50) in the permitted location given the special geographic conditions. The Weitz's only permitted and constructed a 100 sq ft pierhead in order to minimize any view impacts. In addition, the pierhead was designed such that it could be easily removed and replaced with a floating dock (as shown on the attached conceptual drawing) if future entitlement to boat mooring was granted by the Town. The conceptual drawing was specifically designed in order to eliminate a portion of the elevated walkway and the pierhead to least impact views from the western side of the property.

On January 21, 2025, the Weitz's received a zoning permit from the Town to construct the fixed dock to the large creek fronting the northwestern property line. This dock was approved by SCDES on April 9, 2025 and approved U.S. Army Corp of Engineers on June 11, 2025. (permits attached). The dock construction was completed in September 2025. (photos attached).

As outlined in the enclosed application forms, the Weitz's are seeking creation of Floating Dock Key Location 37 for a shoreline length of 50 feet along the northwestern shoreline of 245 Eagle Point Road adjacent to the 104 feet wide creek. Additionally, this request also includes the proposed 636.26 feet reduction of Key Location G according to the January 14, 2025 survey commissioned by the Weitz's. The proposed reduction of 636.26 feet is tied to the granting of the proposed Key Location 37.

In consideration of these requests, please consider that this property is already a designated Key Location and it is merely a requested change from fix dock to floating dock based on a changed geographic condition (similar to the basis for rezoning 248 Eagle Point in 2018). This is consistent with the Town's Comprehensive Plan statement that the Dock Key Locations Ordinance 2003-5 is to prevent the uncontrolled proliferation of docks. With this request, there will be no increase in the number of docks. In addition, similar to the rezoning of Eagle Point 248, a portion of the area designated Location G on the subject property is not allowed a dock under either Town or

SCDES regulations since that tributary is only 12-15 ft wide and a dock is not permissible by either the Town or SCDES.

This rezoning request is consistent with the Town's Comprehensive Plan in that there are no new docks. It also addresses a changed condition, and results in a substantial reduction of linear footage under the Dock Key Location Ordinance. Additionally, this rezoning request is essentially identical to the previously approved rezoning granted to the adjacent property at 248 Eagle Point. It is clear from a review of Key Location Map that the intent of the Ordinance was to allow floating docks on the larger creeks of Kiawah and permit fixed docks on smaller creeks that measured less than 50 ft and are not suitable for boat mooring. This request brings 245 Eagle Point in line with the intent of the Ordinance and consistent with the many other Kiawah properties that are entitled to floating docks and boat mooring on creeks smaller than the creek fronting the property.

Please let me know if you need any further information to evaluate this request. I look forward to discussing this with you soon.

s/Mary D. Shahid

Maynard Nexsen P. C.

205 King Street Fourth Floor

Charleston, SC 29401

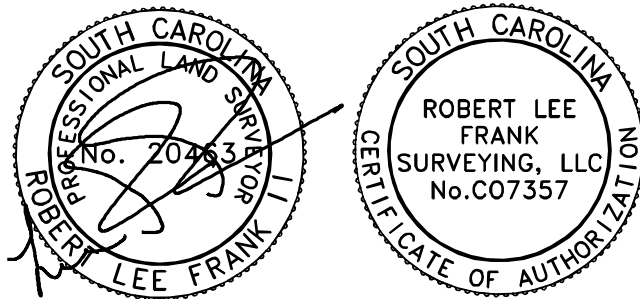
843.345.5838

mshahid@maynardnexsen.com

A PROPOSED
RECREATIONAL DOCK AT
245 EAGLE POINT ROAD
LOCATED ON KIAWAH ISLAND
CHARLESTON COUNTY
SOUTH CAROLINA

THESE DRAWINGS ARE FOR DOCK PERMITTING
ONLY AND DO NOT CONSTITUTE A BOUNDARY
SURVEY OF THIS PROPERTY.

TMS #265-02-00-167



APPLICATION BY:
JONATHAN WEITZ

ADDRESS: 245 EAGLE POINT RD.

DATE: JANUARY 14, 2025

REVISED:

ROBERT LEE FRANK SURVEYING, LLC

5986 SAVANNAH HWY. - RAVENEL, S.C. 29470

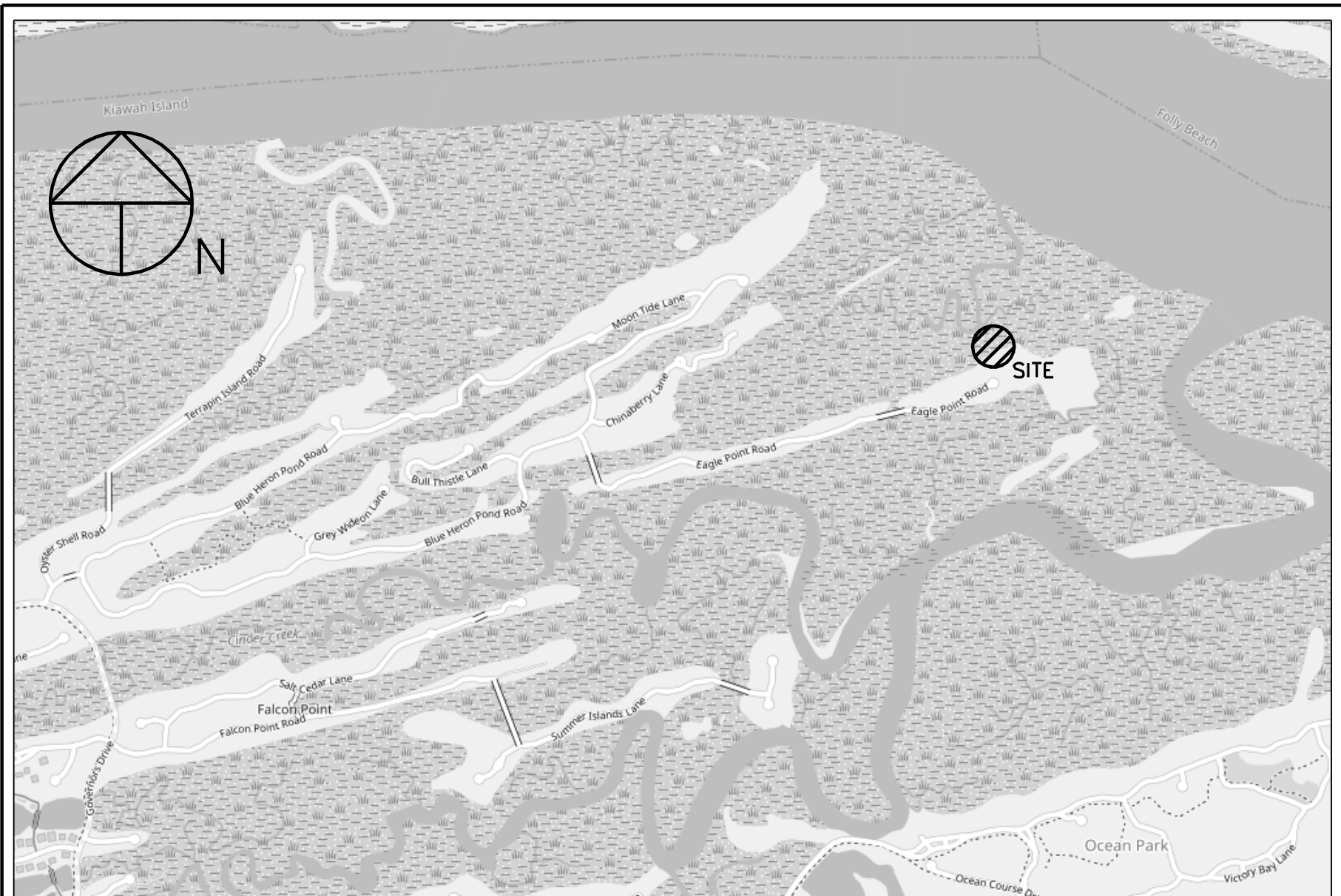
Phone: 843-762-4608

E-mail - robertfranklandsurveying@comcast.net

WEB ADDRESS: www.robertfranksurveying.com

SHT. NO.

1 OF 6



ADJOINING PROPERTY OWNERS:

1. STEPHEN AND JEAN KANA (LOT 243)
2. ROBERT AND SUZAN TILLOTSON (LOT 248)
3. KIAWAH RESORT ASSOCS., LP (MARSH)

APPLICATION BY:
 JONATHAN WEITZ

ADDRESS: 245 EAGLE POINT RD.

DATE: JANUARY 14, 2025

REVISED:

LOCATION

A PROPOSED
 RECREATIONAL DOCK AT
 245 EAGLE POINT ROAD
 LOCATED ON KIAWAH ISLAND
 CHARLESTON COUNTY
 SOUTH CAROLINA

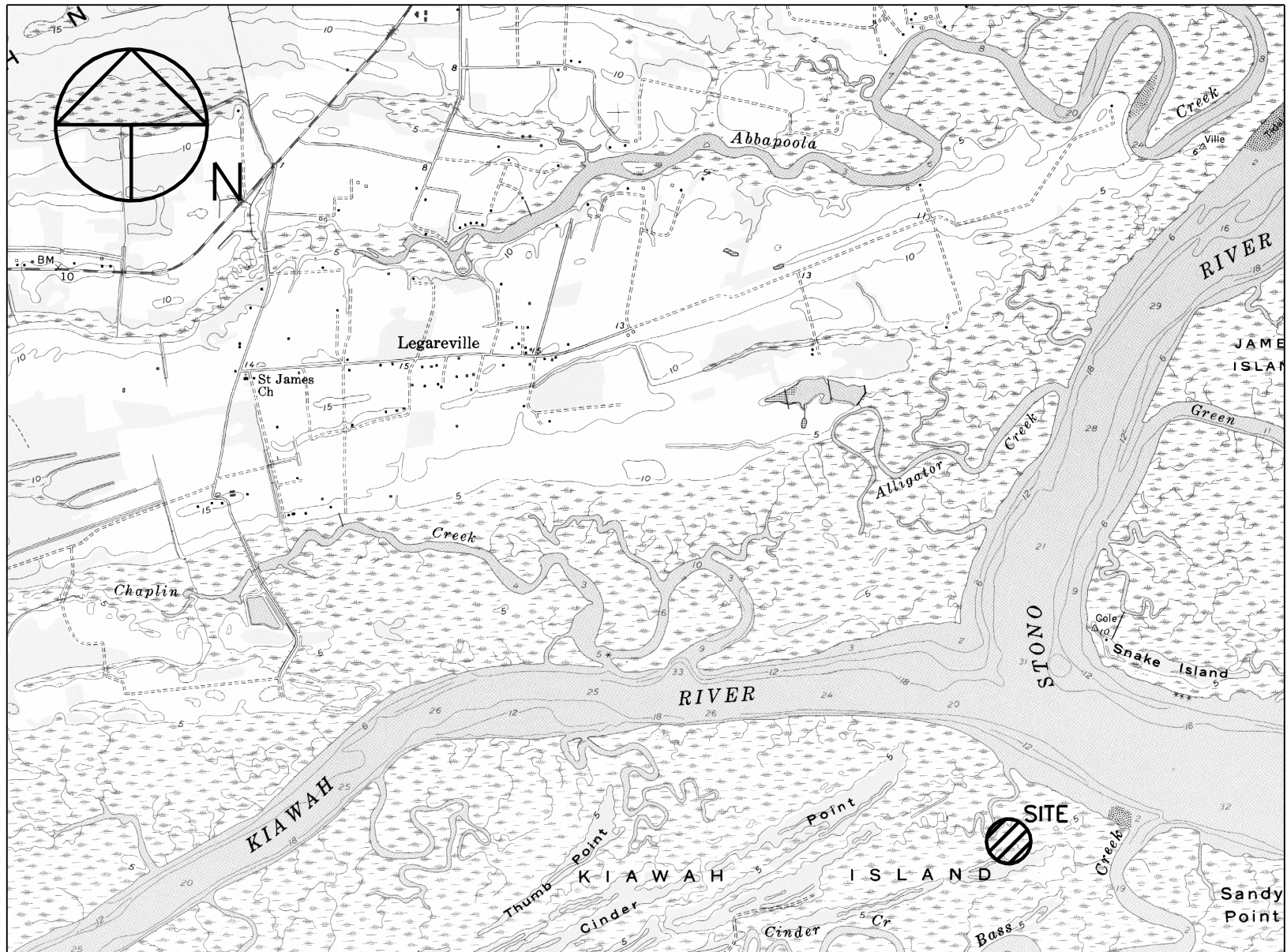
SHT. NAME

LOCATION
 MAP

TMS #265-02-00-167

SHT. NO.

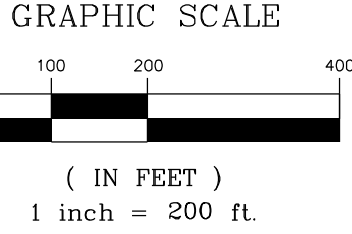
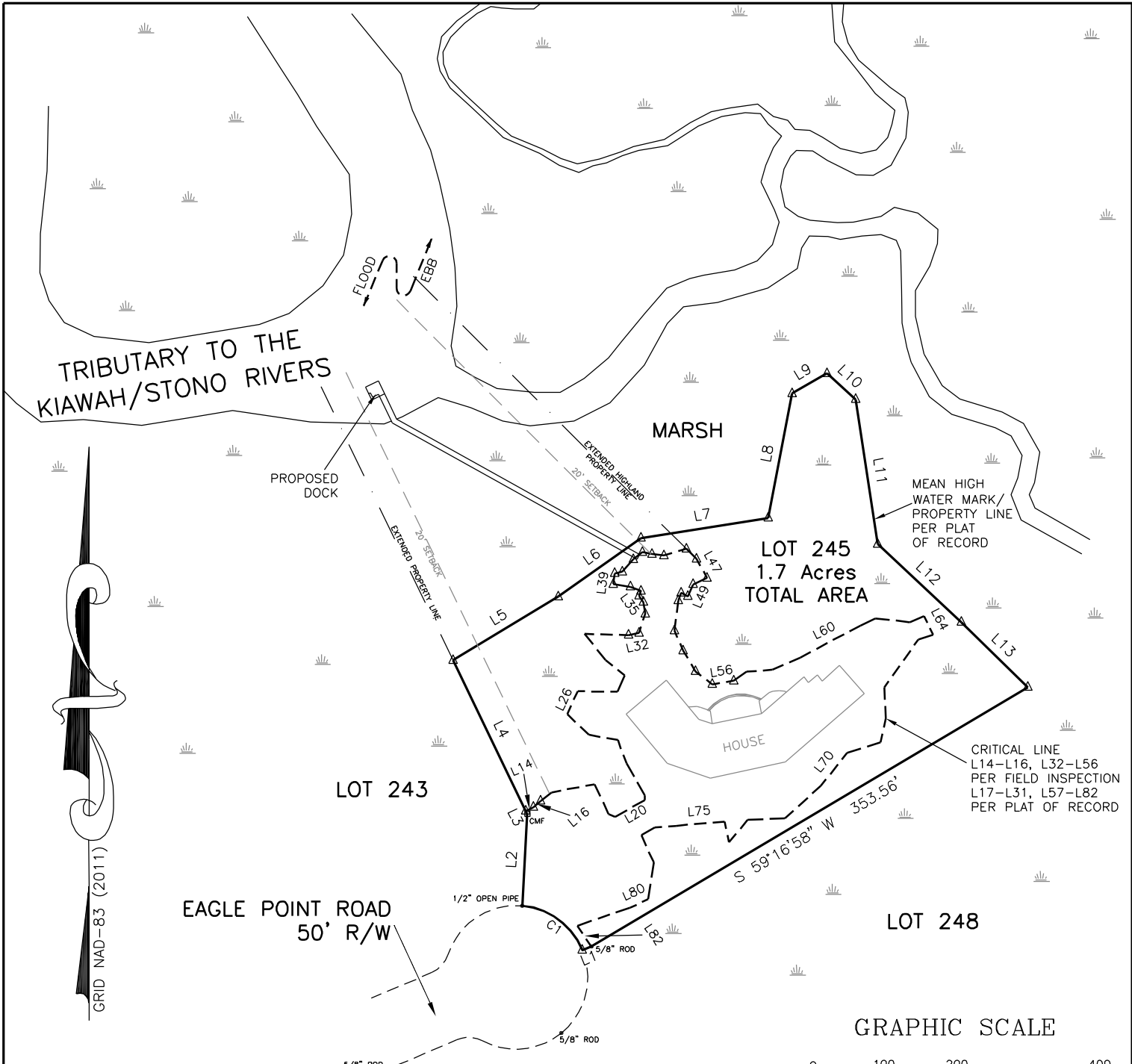
2 OF 6



- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

TMS #265-02-00-167

APPLICATION BY: JONATHAN WEITZ <hr/> ADDRESS: 245 EAGLE POINT RD. <hr/> DATE: JANUARY 14, 2025 <hr/> REVISED:	LOCATION <p style="text-align: center;">A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA</p>	SHT. NAME <p style="text-align: center;">LEGAREVILLE QUADRANGLE MAP</p> PROJECT LATITUDE/LONGITUDE: LATITUDE - 32.630976° LONGITUDE - 80.019922°	SHT. NO. <p style="text-align: center;">3 OF 6</p>
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- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

APPLICATION BY: JONATHAN WEITZ <hr/> ADDRESS: 245 EAGLE POINT RD. <hr/> DATE: JANUARY 14, 2025 <hr/> REVISED:	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME FULL PLAN VIEW TMS #265-02-00-167	SHT. NO. 4 OF 6
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ADJOINING PROPERTY OWNERS:

1. STEPHEN AND JEAN KANA (LOT 243)
2. ROBERT AND SUZAN TILLOTSON (LOT 248)
3. KIAWAH RESORT ASSOCS., LP (MARSH)



LINE	BEARING	DISTANCE
L1	S 68°01'07" W	6.80'
L2	N 03°05'11" E	64.12'
L3	N 25°46'42" W	2.25'
L4	N 25°46'42" W	116.74'
L5	N 58°51'49" E	85.56'
L6	N 54°43'09" E	70.75'
L7	N 81°05'53" E	89.88'
L8	N 10°43'25" E	88.51'
L9	N 60°04'17" E	28.01'
L10	S 47°48'46" E	27.16'
L11	S 08°40'36" E	101.90'
L12	S 46°48'35" E	79.66'
L13	S 45°35'23" E	64.83'

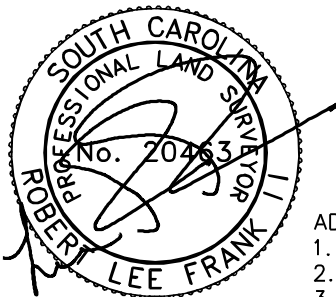
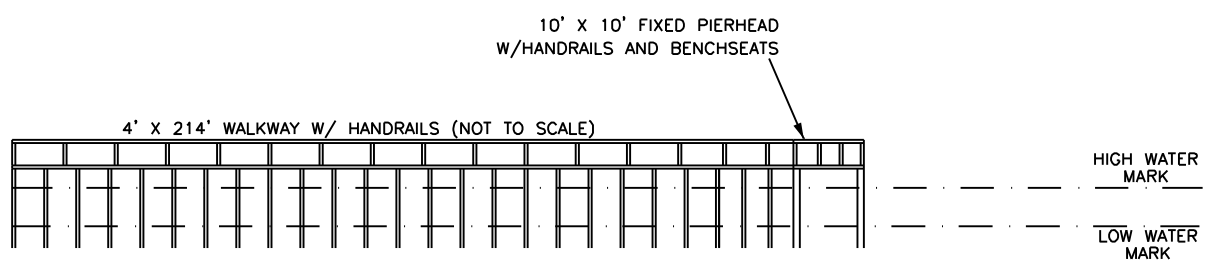
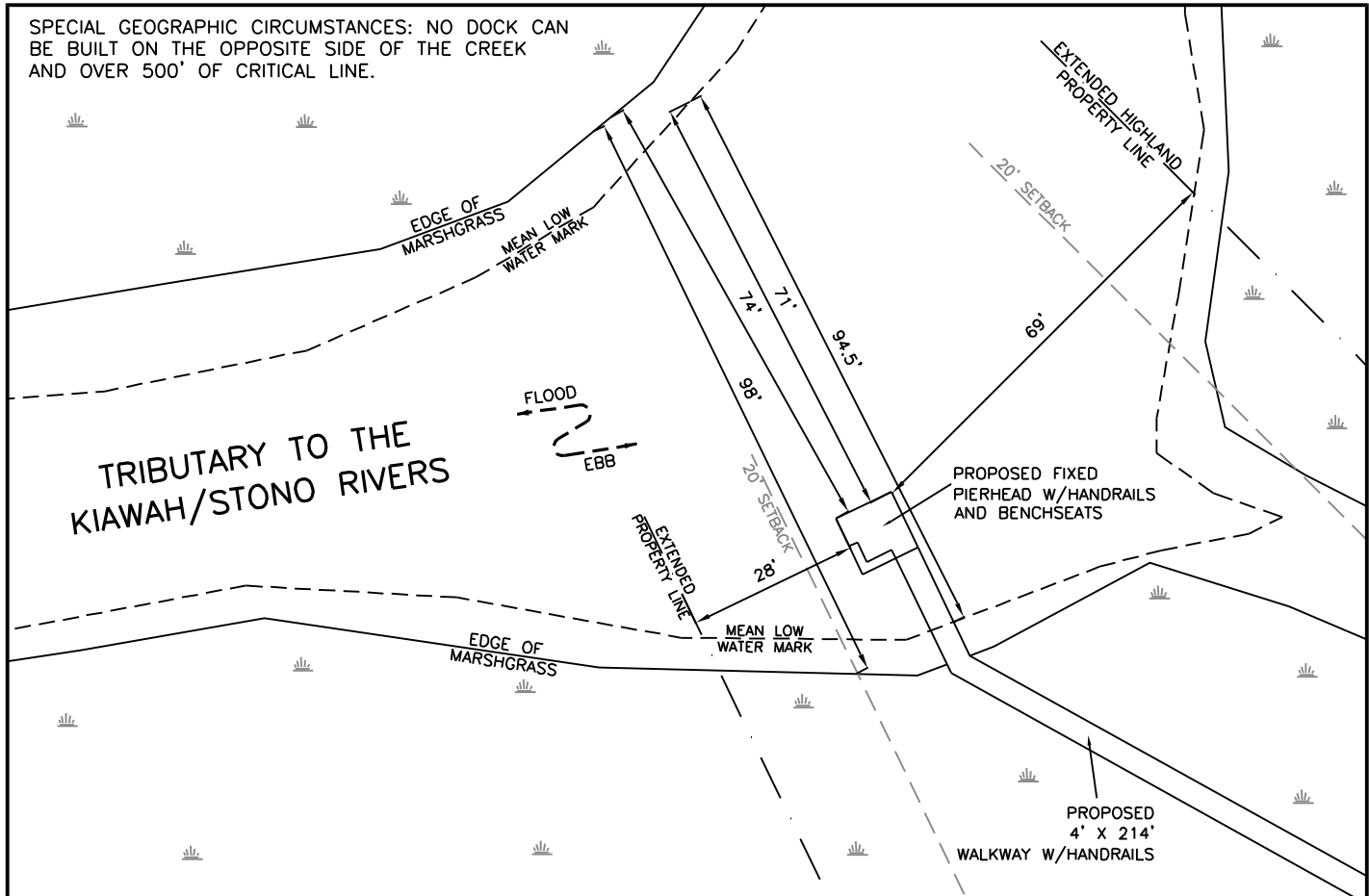
L14	N 64°23'34" E	5.92'
L15	N 47°29'44" E	6.47'
L16	N 52°12'01" E	9.96'
L17	N 79°19'28" E	30.59'
L18	S 24°42'24" E	23.08'
L19	S 66°34'26" E	4.86'
L20	N 60°08'31" E	23.73'
L21	N 03°07'12" E	3.42'
L22	N 29°51'29" W	25.54'
L23	N 20°40'13" W	17.36'
L24	N 79°45'48" W	20.60'
L25	N 46°04'10" W	20.91'
L26	N 24°52'48" E	17.43'
L27	S 89°38'04" E	27.98'
L28	N 23°43'30" E	12.35'
L29	N 51°46'21" W	17.32'
L30	N 38°33'25" W	23.36'
L31	S 88°12'21" E	30.87'
L32	N 77°59'33" E	7.28'
L33	N 18°06'12" E	14.05'
L34	N 09°40'32" W	8.24'
L35	N 34°52'48" W	5.28'
L36	N 23°52'36" E	3.80'
L37	N 68°57'49" W	7.86'
L38	N 80°47'34" W	12.21'
L39	N 08°22'27" E	7.48'
L40	N 77°03'42" E	5.43'
L41	N 41°31'26" E	11.57'
L42	N 50°53'07" E	7.94'
L43	S 78°42'53" E	6.72'
L44	S 82°53'06" E	8.55'
L45	N 73°07'14" E	16.40'
L46	S 45°03'15" E	9.99'
L47	S 28°54'04" E	15.20'

L48	S 64°38'53" W	10.67'
L49	S 24°04'03" W	9.09'
L50	N 62°58'04" W	5.53'
L51	S 19°25'38" W	5.89'
L52	S 07°14'29" W	20.92'
L53	S 23°30'14" E	15.30'
L54	S 31°02'58" E	16.86'
L55	S 51°59'14" E	14.65'
L56	N 80°40'55" E	15.21'
L57	N 54°33'00" E	11.10'
L58	N 85°58'17" E	18.16'
L59	N 65°51'35" E	20.95'
L60	N 62°09'32" E	47.43'
L61	N 64°42'46" E	11.71'
L62	S 84°01'32" E	23.93'
L63	N 68°14'31" E	10.88'
L64	S 26°26'25" E	14.21'
L65	S 71°53'02" W	10.80'
L66	S 35°22'47" W	40.91'
L67	S 02°09'15" E	21.83'
L68	S 11°31'06" W	16.92'
L69	S 73°00'34" W	24.58'
L70	S 38°10'47" W	29.40'
L71	S 47°42'19" W	33.85'
L72	S 87°55'53" W	25.96'
L73	S 40°00'14" W	20.59'
L74	N 10°55'19" W	14.84'
L75	S 85°03'37" W	34.24'
L76	S 85°45'38" W	14.73'
L77	S 60°08'31" W	10.88'
L78	S 24°39'50" E	21.02'
L79	S 08°29'36" W	25.76'
L80	S 64°34'44" W	14.00'
L81	S 71°09'39" W	38.87'
L82	S 34°03'31" E	17.45'

CURVE	RADIUS	ARC LENGTH	CHORD LENGTH	CHORD BEARING	DELTA ANGLE	TANGENT
C1	50.00'	54.71'	52.02'	N 53°35'31" W	62°41'33"	30.46'

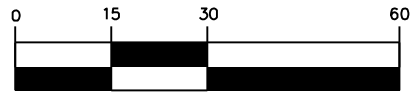
APPLICATION BY: JONATHAN WEITZ ADDRESS: 245 EAGLE POINT RD. DATE: JANUARY 14, 2025 REVISED:	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME LINE DATA TMS #265-02-00-167	SHT. NO. 5 OF 6
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SPECIAL GEOGRAPHIC CIRCUMSTANCES: NO DOCK CAN BE BUILT ON THE OPPOSITE SIDE OF THE CREEK AND OVER 500' OF CRITICAL LINE.



- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

GRAPHIC SCALE



(IN FEET)
1 inch = 30 ft.

<p>APPLICATION BY: JONATHAN WEITZ</p> <hr/> <p>ADDRESS: 245 EAGLE POINT RD.</p> <hr/> <p>DATE: JANUARY 14, 2025</p> <hr/> <p>REVISED:</p>	<p>LOCATION</p> <p>A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA</p>	<p>SHT. NAME</p> <p>PLAN VIEW</p> <p>TMS #265-02-00-167</p>	<p>SHT. NO.</p> <p>6 OF 6</p>
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WITNESS my hand and seal this 23rd day of April, 2024.

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF:

Witness #1

Witness #2

Susan M. Kearney
Susan M. Kearney, Trustee of the Susan M.
Kearney Revocable Trust u/i/d January 31,
1997, as amended

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

The foregoing instrument was acknowledged before me by Susan M. Kearney, Trustee of the Susan M. Kearney Revocable Trust u/i/d January 31, 1997, as amended, this 23rd day of April, 2024.

[Signature] (SEAL)
Notary Public for _____
My commission expires: _____

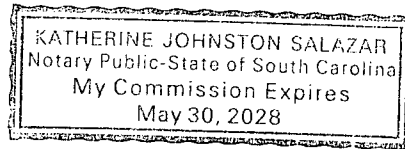


EXHIBIT A

All that certain piece, parcel, or lot of land situate, lying and being in the Town of Kiawah Island, Charleston County, South Carolina, containing 1.700 acres, more or less, known and designated as Lot Number Two Hundred Forty-Five (245), Eagle Point, in The Preserve, Phase VII, Parcel 30, Subdivision 432 (a/k/a 245 Eagle Point Road) and shown on a plat by Southeastern Surveying of Charleston, Inc. entitled "A CONDITIONAL SUBDIVISION PLAT OF LOTS 239, 241 THRU 246 AND 248 THE PRESERVE PHASE VII PARCEL 30 SUBDIVISION 432 OWNED BY KIAWAH LAND DEVELOPMENT, LLC LOCATED IN THE TOWN OF KIAWAH ISLAND, CHARLESTON COUNTY, SOUTH CAROLINA" dated June 21, 2004, and recorded in Plat Book EH at pages 332 and 333, with most recent revision shown on a plat by Southeastern Surveying of Charleston, Inc. entitled "A FINAL SUBDIVISION PLAT OF LOTS 239, 241 THRU 246 AND 248 THE PRESERVE PHASE VII PARCEL 30 SUBDIVISION 432 OWNED BY KIAWAH LAND DEVELOPMENT, LLC LOCATED IN THE TOWN OF KIAWAH ISLAND, CHARLESTON COUNTY, SOUTH CAROLINA" dated July 14, 2005, and recorded in Plat Book EJ at pages 200 and 201 (the "Plat"), in the office of the Register of Mesne Conveyances for Charleston County, S.C., (hereinafter the "R.M.C. Office"), said lot having such location, butts and bounds, metes, courses, and distances as will by reference to said plat more fully appear (the "Property").

Said property is subject to all applicable covenants, conditions, restrictions, limitations, obligations and easements of record affecting subject property.

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

AFFIDAVIT FOR TAXABLE OR EXEMPT TRANSFERS

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. I have read the information on this Affidavit and I understand such information.
2. The property being transferred is located at 245 Eagle Point Road, Kiawah Island, SC 29455 bearing Charleston County Tax Map Number 265-02-00-167, was transferred by **Susan M. Kearney, Trustee of the Susan M. Kearney Revocable Trust u/i/d January 31, 1997, as amended to Jonathan Pellett Weitz and Lisa D. Weitz** on May 3, 2024.
3. Check one of the following: The deed is
 - (a) X subject to the deed recording fee as a transfer for consideration paid or to be paid in money or money's worth.
 - (b) _____ subject to the deed recording fee as a transfer between a corporation, a partnership, or other entity and a stockholder, partner, or owner of the entity, or is a transfer to a trust or as distribution to a trust beneficiary.
 - (c) _____ exempt from the deed recording fee because (See Information section of affidavit): _____ (If exempt, please skip items 4-7, and go to item 8 of this affidavit.)

If exempt under exemption #14 as described in the Information section of this affidavit, did the agent and principal relationship exist at the time of the original sale and was the purpose of this relationship to purchase the realty? Check Yes _____ or No _____

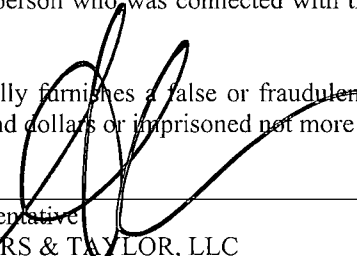
4. Check one of the following if either item 3(a) or item 3(b) above has been checked (See information section of this affidavit.):
 - (a) X The fee is computed on the consideration paid or to be paid in money or money's worth in the amount of \$11,500,000.00
 - (b) _____ The fee is computed on the fair market value of the realty which is \$ _____.
 - (c) _____ The fee is computed on the fair market value of the realty as established for property tax purposes which is \$ _____.

5. Check YES _____ or NO X to the following: A lien or encumbrance existed on the land, tenement, or realty before the transfer and remained on the land, tenement, or realty after the transfer. (This includes, pursuant to Code Section 12-59-140(E)(6), any lien or encumbrance on realty in possession of a forfeited land commission which may subsequently be waived or reduced after the transfer under a signed contract or agreement between the lien holder and the buyer existing before the transfer.) If "Yes," the amount of the outstanding balance of this lien or encumbrance is: _____.

6. The deed recording fee is computed as follows:
 - (a) Place the amount listed in item 4 above here: 11,500,000.00
 - (b) Place the amount listed in item 5 above here: _____
(If no amount is listed, place zero here.)
 - (c) Subtract line 6(b) from Line 6(a) and place result here: 11,500,000.00


7. As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as : Legal Representative

8. I understand that a person required to furnish this affidavit who willfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

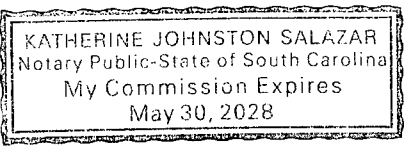


 Legal Representative
 BUIST, BYARS & TAYLOR, LLC

Sworn to before me this 3rd day
of May, 2024.



 Notary Public for _____
 My Commission Expires: _____



RECORDER'S PAGE



NOTE: This page **MUST** remain with the original document

Filed By:

BUIST BYARS & TAYLOR, LLC
 FRESHFIELDS VILLAGE
 130 GARDNER'S CR PMB 138
 JOHNS ISLAND SC 29455 (COURIER)

RECORDED		
Date:	May 6, 2024	
Time:	12:05:48 PM	
<u>Book</u>	<u>Page</u>	<u>DocType</u>
1243	049	Deed
Karen Hollings, Register of Deeds Charleston County, SC		

MAKER:

KEARNEY SUSAN M TR AL

Note:

RECIPIENT:

WEITZ JONATHAN P AL

of Pages:

Recording Fee	\$ 15.00
State Fee	\$ 29,900.00
County Fee	\$ 12,650.00
Extra Pages	\$ -
Postage	\$ -
Chattel	\$ -
TOTAL	\$ 42,565.00

Original Book:

Original Page:

DRAWER
CLERK

AUDITOR STAMP HERE
 RECEIVED From ROD
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 Charleston County Auditor

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 LMC
 REP _____
 DATE 05/09/2024



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Book



049
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05/06/2024
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Original Book



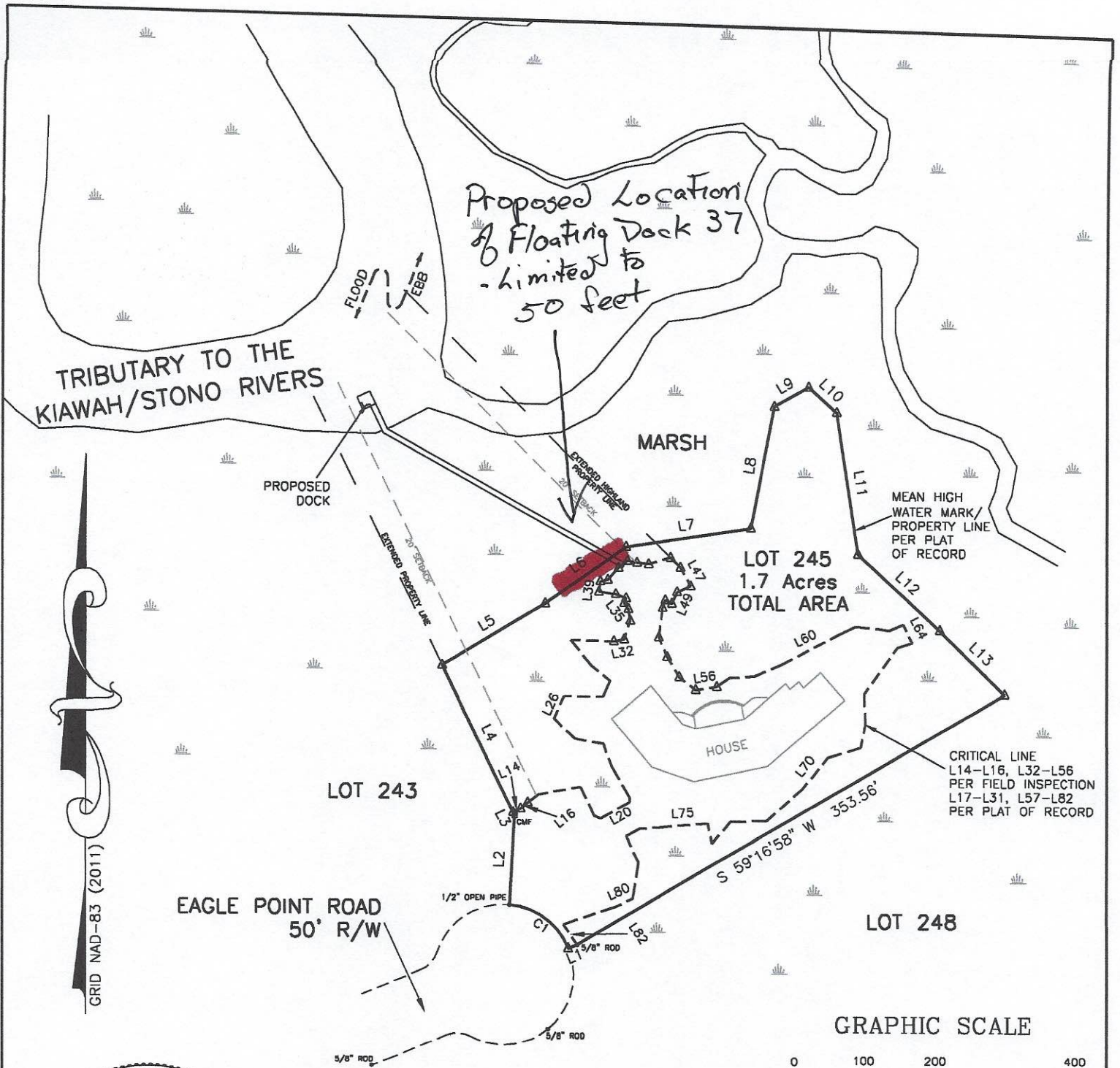
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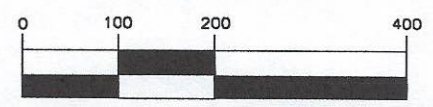
12:05:48
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GRID NAD-83 (2011)



GRAPHIC SCALE



(IN FEET)
1 inch = 200 ft.

- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

APPLICATION BY: JONATHAN WEITZ ADDRESS: 245 EAGLE POINT RD. DATE: JANUARY 14, 2025 REVISED:	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME FULL PLAN VIEW TMS #265-02-00-167	SHT. NO. 4 OF 6
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ADJOINING PROPERTY OWNERS:

1. STEPHEN AND JEAN KANA (LOT 243)
2. ROBERT AND SUZAN TILLOTSON (LOT 248)
3. KIAWAH RESORT ASSOCS., LP (MARSH)



LINE	BEARING	DISTANCE
L1	S 68°01'07" W	6.80'
L2	N 03°05'11" E	64.12'
L3	N 25°46'42" W	2.25'
L4	N 25°46'42" W	116.74'
L5	N 58°51'49" E	85.56'
L6	N 54°43'09" E	70.75'
L7	N 81°05'53" E	89.88'
L8	N 10°43'25" E	88.51'
L9	N 60°04'17" E	28.01'
L10	S 47°48'46" E	27.16'
L11	S 08°40'36" E	101.90'
L12	S 46°48'35" E	79.66'
L13	S 45°35'23" E	64.83'

L14	N 64°23'34" E	5.92'
L15	N 47°29'44" E	6.47'
L16	N 52°12'01" E	9.96'
L17	N 79°19'28" E	30.59'
L18	S 24°42'24" E	23.08'
L19	S 66°34'26" E	4.86'
L20	N 60°08'31" E	23.73'
L21	N 03°07'12" E	3.42'
L22	N 29°51'29" W	25.54'
L23	N 20°40'13" W	17.36'
L24	N 79°45'48" W	20.60'
L25	N 46°04'10" W	20.91'
L26	N 24°52'48" E	17.43'
L27	S 89°38'04" E	27.98'
L28	N 23°43'30" E	12.35'
L29	N 51°46'21" W	17.32'
L30	N 38°33'25" W	23.36'
L31	S 88°12'21" E	30.87'
L32	N 77°59'33" E	7.28'
L33	N 18°06'12" E	14.05'
L34	N 09°40'32" W	8.24'
L35	N 34°52'48" W	5.28'
L36	N 23°52'36" E	3.80'
L37	N 68°57'49" W	7.86'
L38	N 80°47'34" W	12.21'
L39	N 08°22'27" E	7.48'
L40	N 77°03'42" E	5.43'
L41	N 41°31'26" E	11.57'
L42	N 50°53'07" E	7.94'
L43	S 78°42'53" E	6.72'
L44	S 82°53'06" E	8.55'
L45	N 73°07'14" E	16.40'
L46	S 45°03'15" E	9.99'
L47	S 28°54'04" E	15.20'

L48	S 64°38'53" W	10.67'
L49	S 24°04'03" W	9.09'
L50	N 62°58'04" W	5.53'
L51	S 19°25'38" W	5.89'
L52	S 07°14'29" W	20.92'
L53	S 23°30'14" E	15.30'
L54	S 31°02'58" E	16.86'
L55	S 51°59'14" E	14.65'
L56	N 80°40'55" E	15.21'
L57	N 54°33'00" E	11.10'
L58	N 85°58'17" E	18.16'
L59	N 65°51'35" E	20.95'
L60	N 62°09'32" E	47.43'
L61	N 64°42'46" E	11.71'
L62	S 84°01'32" E	23.93'
L63	N 68°14'31" E	10.88'
L64	S 26°26'25" E	14.21'
L65	S 71°53'02" W	10.80'
L66	S 35°22'47" W	40.91'
L67	S 02°09'15" E	21.83'
L68	S 11°31'06" W	16.92'
L69	S 73°00'34" W	24.58'
L70	S 38°10'47" W	29.40'
L71	S 47°42'19" W	33.85'
L72	S 87°55'53" W	25.96'
L73	S 40°00'14" W	20.59'
L74	N 10°55'19" W	14.84'
L75	S 85°03'37" W	34.24'
L76	S 85°45'38" W	14.73'
L77	S 60°08'31" W	10.88'
L78	S 24°39'50" E	21.02'
L79	S 08°29'36" W	25.76'
L80	S 64°34'44" W	14.00'
L81	S 71°09'39" W	38.87'
L82	S 34°03'31" E	17.45'

CURVE	RADIUS	ARC LENGTH	CHORD LENGTH	CHORD BEARING	DELTA ANGLE	TANGENT
C1	50.00'	54.71'	52.02'	N 53°35'31" W	62°41'33"	30.46'

APPLICATION BY: JONATHAN WEITZ	LOCATION A PROPOSED RECREATIONAL DOCK AT 245 EAGLE POINT ROAD LOCATED ON KIAWAH ISLAND CHARLESTON COUNTY SOUTH CAROLINA	SHT. NAME LINE DATA TMS #265-02-00-167	SHT. NO. 5 OF 6
ADDRESS: 245 EAGLE POINT RD.			
DATE: JANUARY 14, 2025			
REVISED:			



Coastal Consulting

Agency Relations/Environmental Permits

Curtis Joyner, Owner

843-830-8858

PO Box 30937

Charleston, SC 29417

Joynercm@bridgeviewcc.com

October 29, 2025

Ms. Mary Shahid

Maynard Nexsen

205 King Street, Suite 400

Charleston, SC 29401

Re: Weitz dock modification, 245 Eagle Point Road, Kiawah Island, SC

Dear Ms. Shahid:

This letter provides information for your use with the Town of Kiawah Island, in anticipation of amending Agency authorizations (SCDES BCM - BCM05747 and the US Army Corps of Engineers - SAC-2025-00279).

As background, Mr. Weitz and I received Agency authorizations for a very basic dock to be located on Bass Creek at the above-mentioned property which consists of a 4' by 214' walkway with handrails leading to a 10' by 10' uncovered fixed pierhead. Mr. Weitz is planning to modify the authorizations to replace the pierhead with a 3' by 20' ramp to lead from the walkway to a 4' by 4' ramp landing and a 3' by 32' floating catwalk which would parallel a 12' by 32' floating boat storage device.

Upon reviewing the applicable Agency regulations, it appears they can approve this modification. The SCDES BCM definitions and regulations have a base size allowance, and due to special geographic circumstances (no dock form opposite shore), they can authorize a structure up to 240 sq. ft. Walkways, catwalks, and ramps do not factor into this calculation. The USACOE regulations do not possess size-based limitations.

Thank you and let me know if you have any questions.

Sincerely,

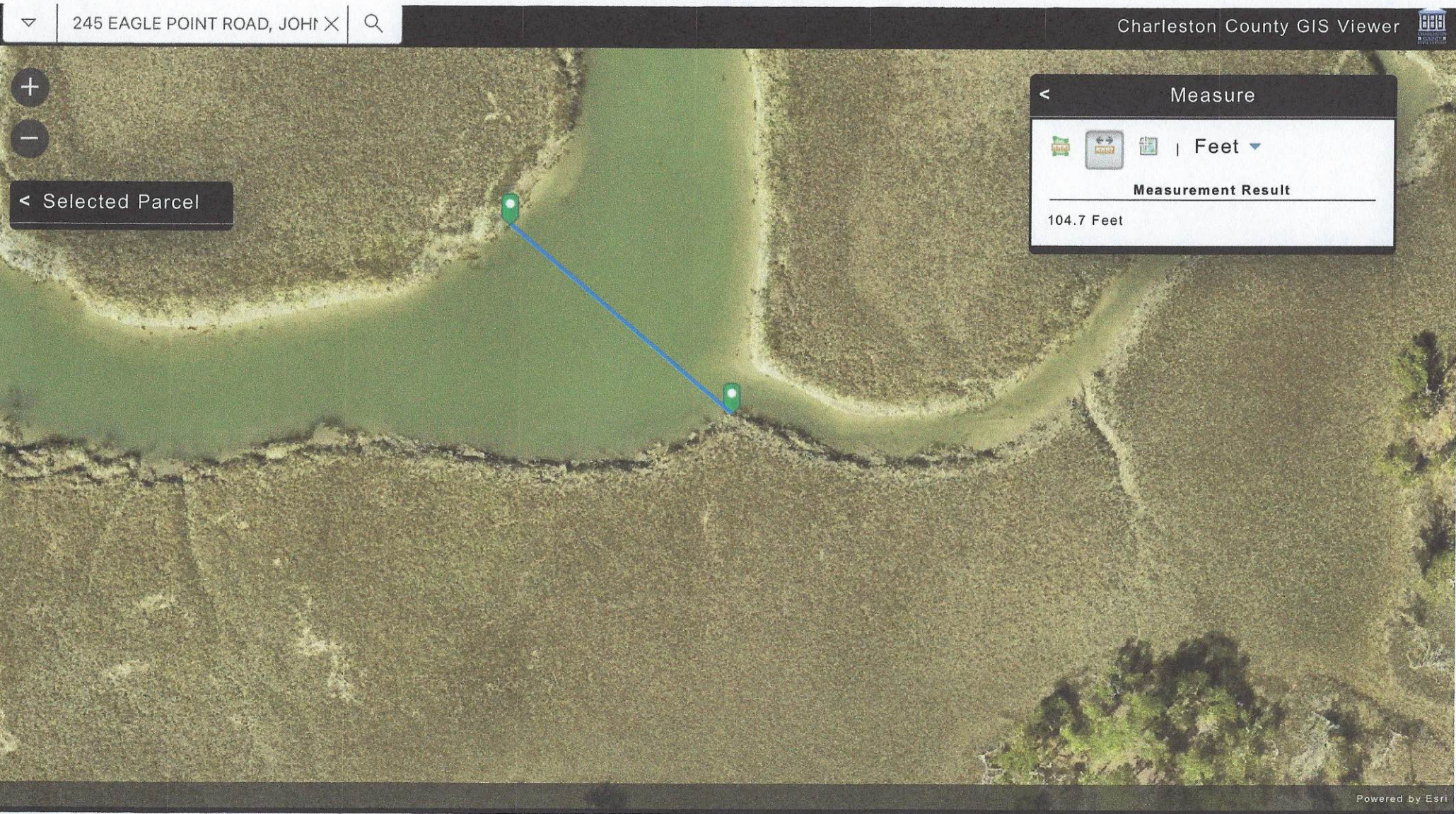
A handwritten signature in black ink, appearing to read "C. Joyner".

Curtis Joyner

BridgeView Coastal Consulting

Cc: Jonathon Weitz

245 Eagle Point . Dimension A
2025



245 EAGLE POINT ROAD, JOHN X

Charleston County GIS Viewer

< Selected Parcel

< Measure

Feet

Measurement Result

104.7 Feet

Powered by Esri

245 Eagle Point - 2001 - Dimension A

2:19 PM Wed Sep 24

16%



gisccweb.charlestoncounty.org



Board of Zoning...

Approved Ordin...

Claridge's: Lux...

Claridge's: Lux...

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gisccweb.charl...

Session Timeout

Charleston County GIS Charleston County ROD Charleston County Home Page

245 EAGLE POINT ROAD, JOHN X

Charleston County GIS Viewer



< Selected Parcel

Measure

Feet

Measurement Result

79.5 Feet

Charleston County GIS

Powered by Esri



245 Eagle Point - 2025
Dimension B

245 EAGLE POINT ROAD, JOHN X

Charleston County GIS Viewer

Selected Parcel

Measure

Feet

Measurement Result

90.7 Feet

Powered by Esri

The image shows a screenshot of a web-based GIS application. At the top, a search bar contains the text "245 EAGLE POINT ROAD, JOHN X". To the right of the search bar, the text "Charleston County GIS Viewer" is displayed. The main area of the screen is an aerial photograph of a landscape featuring a large, irregularly shaped pond. A blue line with green circular endpoints is drawn across the pond, representing a measurement. On the left side of the map, there are zoom-in (+) and zoom-out (-) buttons, and a dark grey button labeled "Selected Parcel". On the right side, a "Measure" tool window is open, showing a scale bar and the text "Measurement Result" followed by "90.7 Feet". At the bottom of the screen, there is a dark grey toolbar with various icons for navigation and tool use. The text "Powered by Esri" is visible in the bottom right corner of the map area.

245 Eagle Point - 2001
Dimension B

245 EAGLE POINT ROAD, JOHN X

Charleston County GIS Viewer

Measure

Feet

Measurement Result

54.2 Feet

< Selected Parcel

Charleston County GIS

Powered by Esri

Depicting the small tributary on eastern shoreline of 245 Eagle Point is not wide enough to meet design criteria of Town of SCDES

245 Eagle point

Charleston County GIS Viewer

Selected Parcel

PID	2650200167
OWNER1	WEITZ JONATHAN PELLETT
PLAT BOOK PAGE	EJ-200
DEED BOOK PAGE	1243-049
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

14.7 Feet

Powered by Esri

EXAMPLES OF PROPERTIES WITH FIXED DOCK ENTITLEMENT

Creek at 245 Eagle Point is 104.7 feet

DATA FROM THE 2025 CHARLESTON COUNTY GIS MAP

	Address	Creek Width
1	67 Falcon Point Road	15.7
2	3 Shell Creek Landing	34.5
3	1 Shell Creek Landing	36.8
4	15 Terrapin Island Lane	40.3
5	26 Marsh Cottage Lane	50.5
6	26 Marsh Cottage lane	50.5

67 FALCON POINT ROAD, JOHI X



Selected Parcel	
PID	2650700024
OWNER1	ZANGRILLO GINA
PLAT BOOK PAGE	EB-2
DEED BOOK PAGE	0400-939
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

15.7 Feet





3 SHELL CREEK LODGE, JOHN X



Selected Parcel	
PID	2650900037
OWNER1	MUELLER HAROLD C TRUST
PLAT BOOK PAGE	ED-43
DEED BOOK PAGE	0986-591
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

34.5 Feet



1 SHELL CREEK LODGE, JOHN: X



Selected Parcel

PID	2650900034
OWNER1	CORIO LAWRENCE P
PLAT BOOK PAGE	EA-539
DEED BOOK PAGE	R610-262
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

36.8 Feet

15 terrapin



Selected Parcel

PID	2650100001
OWNER1	WATSON STEPHEN H
PLAT BOOK PAGE	EB-165
DEED BOOK PAGE	1166-932
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

40.3 Feet

25 MARSH COTTAGE LANE, JC X



2650900041

Selected Parcel

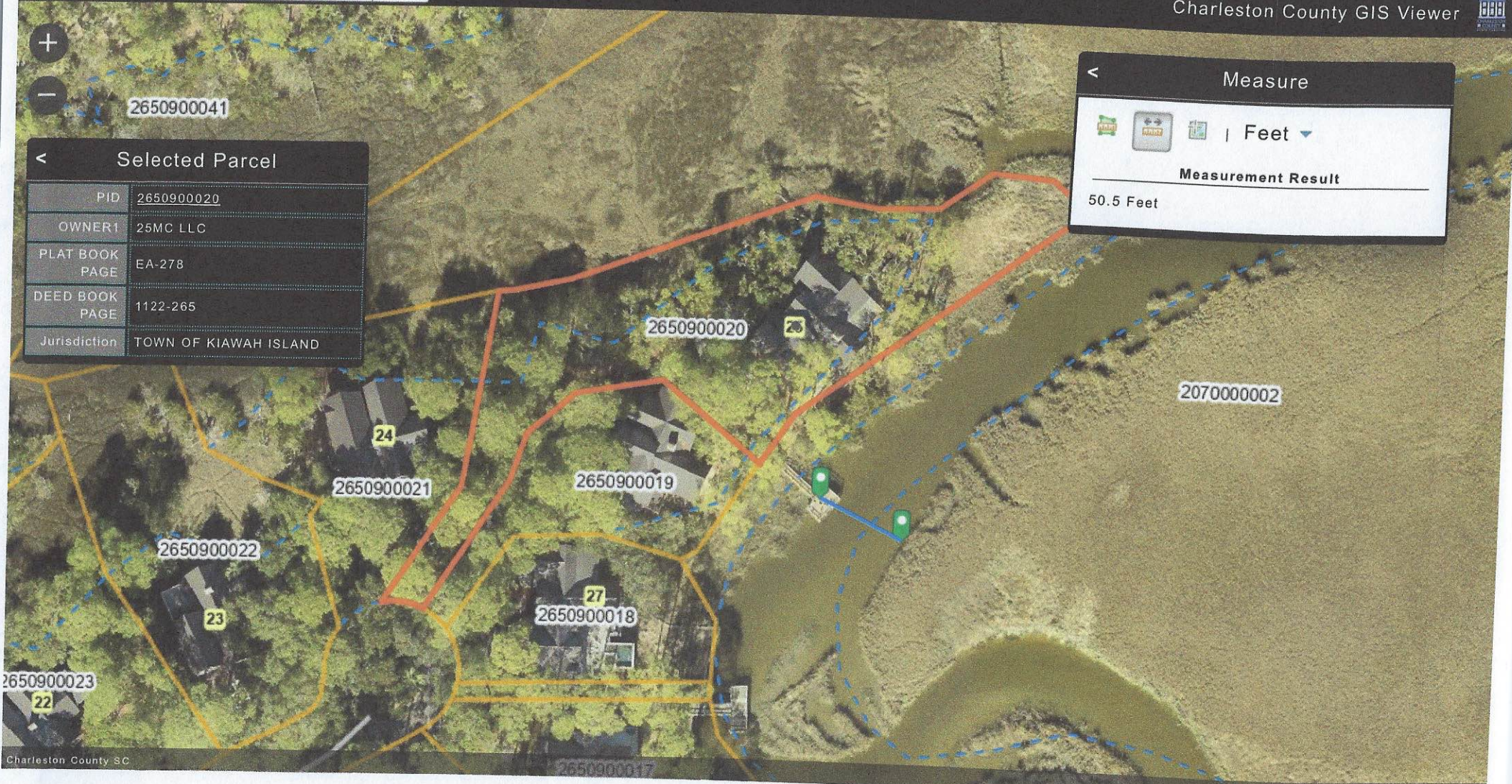
PID	2650900020
OWNER1	25MC LLC
PLAT BOOK PAGE	EA-278
DEED BOOK PAGE	1122-265
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

1 Feet

Measurement Result

50.5 Feet



**EXAMPLES OF PROPERTIES WITH FLOATING DOCK ENTITLEMENT
CREEKS EQUAL OR LESS THAN 105 FEET**

Creek at 245 Eagle Point is 104.7 feet

DATA FROM THE 2025 CHARLESTON COUNTY GIS MAP

	Address	Creek Width
1	14 Terrapin Island Lane	47.5
2	58 Salt Cedar	69.2
3	6 Club Cottage Lane	69.7
4	13 Terrapin Island Lane	71.1
5	7 Club Cottage Lane	74.3
6	53 Salt Cedar	82.6
7	11 Terrapin Island Lane	87.0
8	477 Little Bear Way	89.5
9	372 Helena Court	94.2
10	370 Helena Court	98.7
11	7 Summer Island Way	100.2
12	374 Helena Court	101.3
13	48 Blue Heron Pond	104.8
14	234 Eagle Point	105.9

14 TERRAPIN ISLAND LANE, JC X



Charleston County GIS Viewer



Selected Parcel

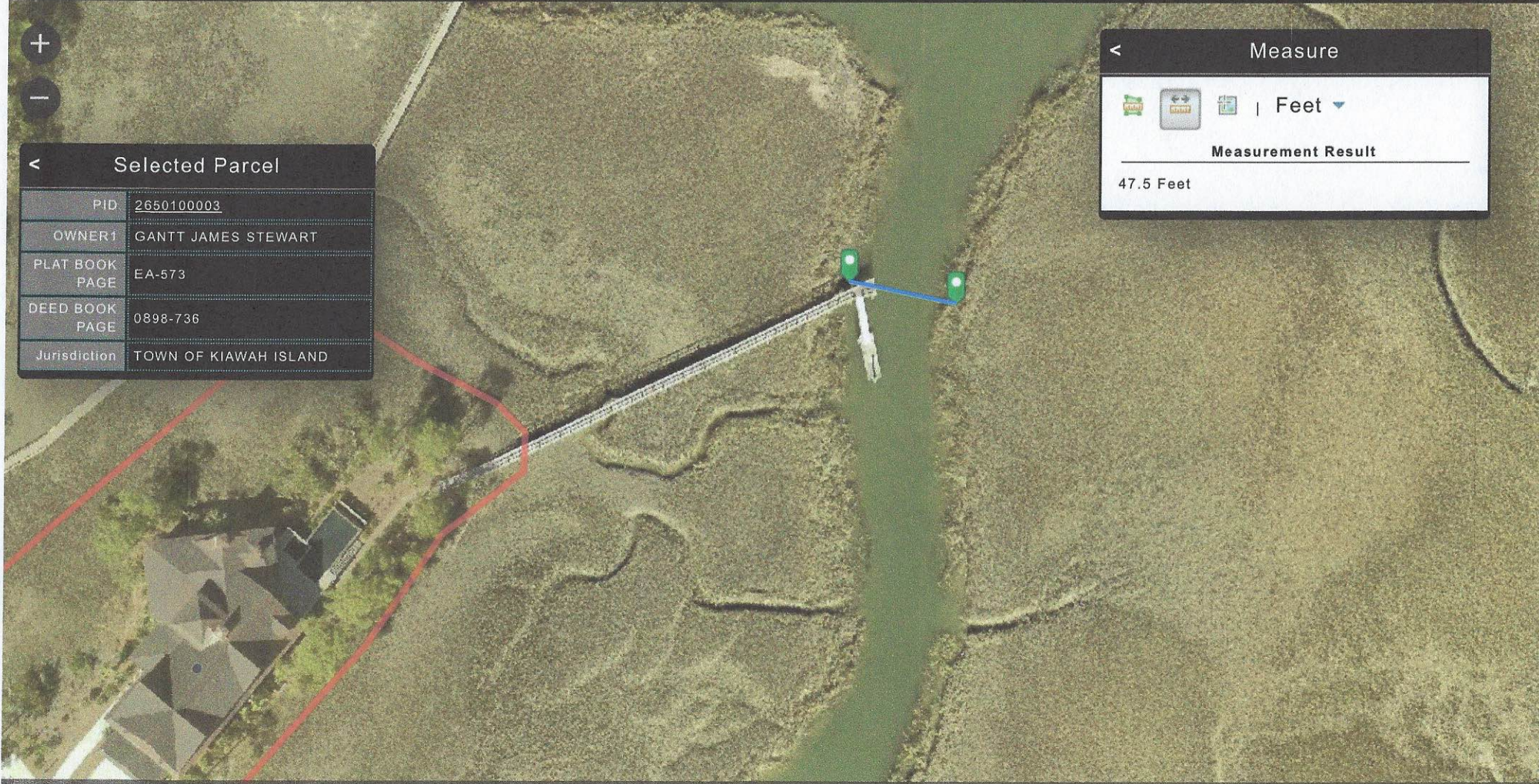
PID	2650100003
OWNER1	GANTT JAMES STEWART
PLAT BOOK PAGE	EA-573
DEED BOOK PAGE	0898-736
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

47.5 Feet





58 SALT CEDAR LANE, JOHNS X



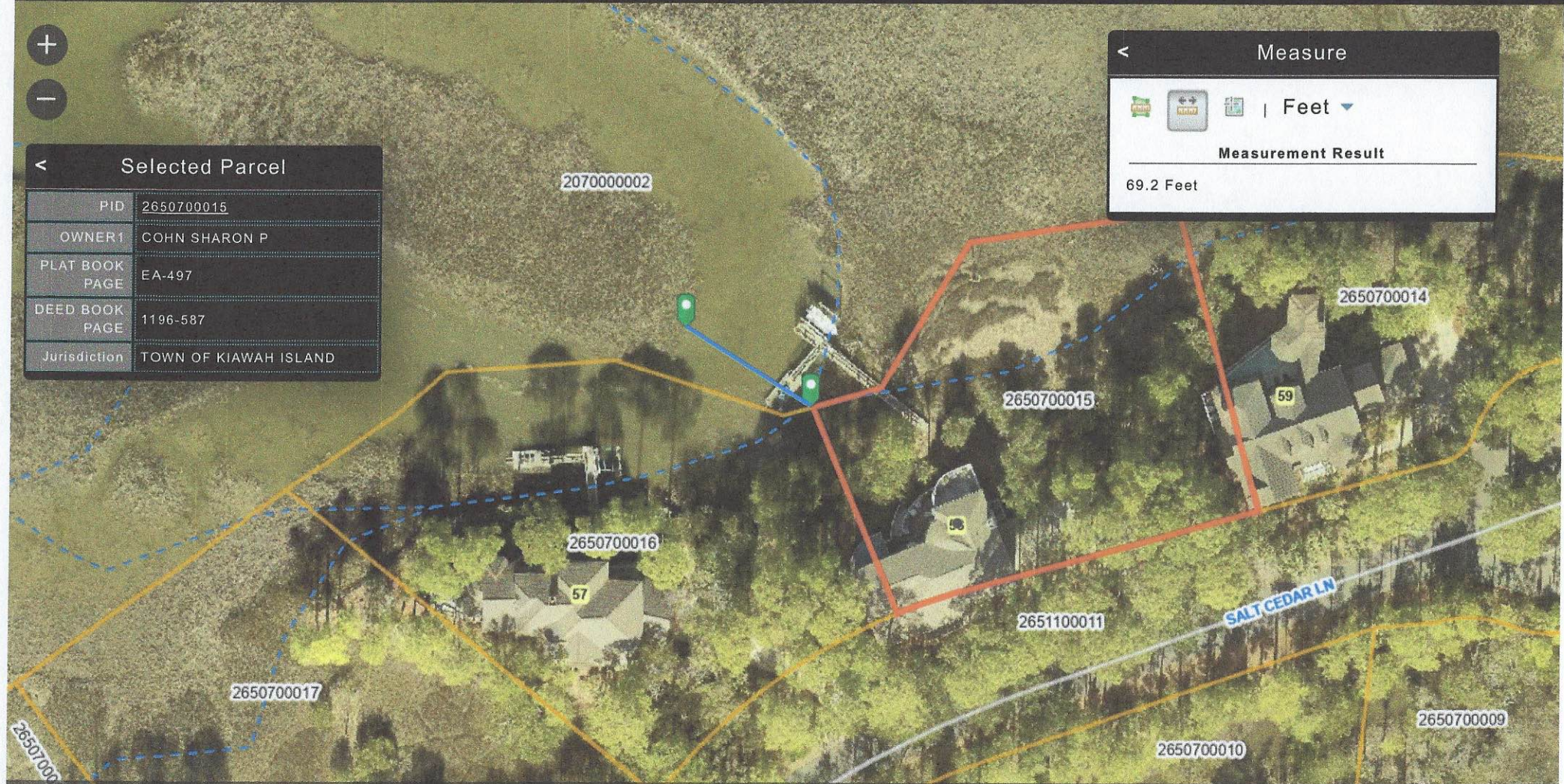
Selected Parcel	
PID	2650700015
OWNER1	COHN SHARON P
PLAT BOOK PAGE	EA-497
DEED BOOK PAGE	1196-587
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

69.2 Feet



6 CLUB COTTAGE LANE, JOHN X



Selected Parcel

PID	2650900006
OWNER1	RICHARDSON C THOMAS
PLAT BOOK PAGE	CN-72
DEED BOOK PAGE	1062-327
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

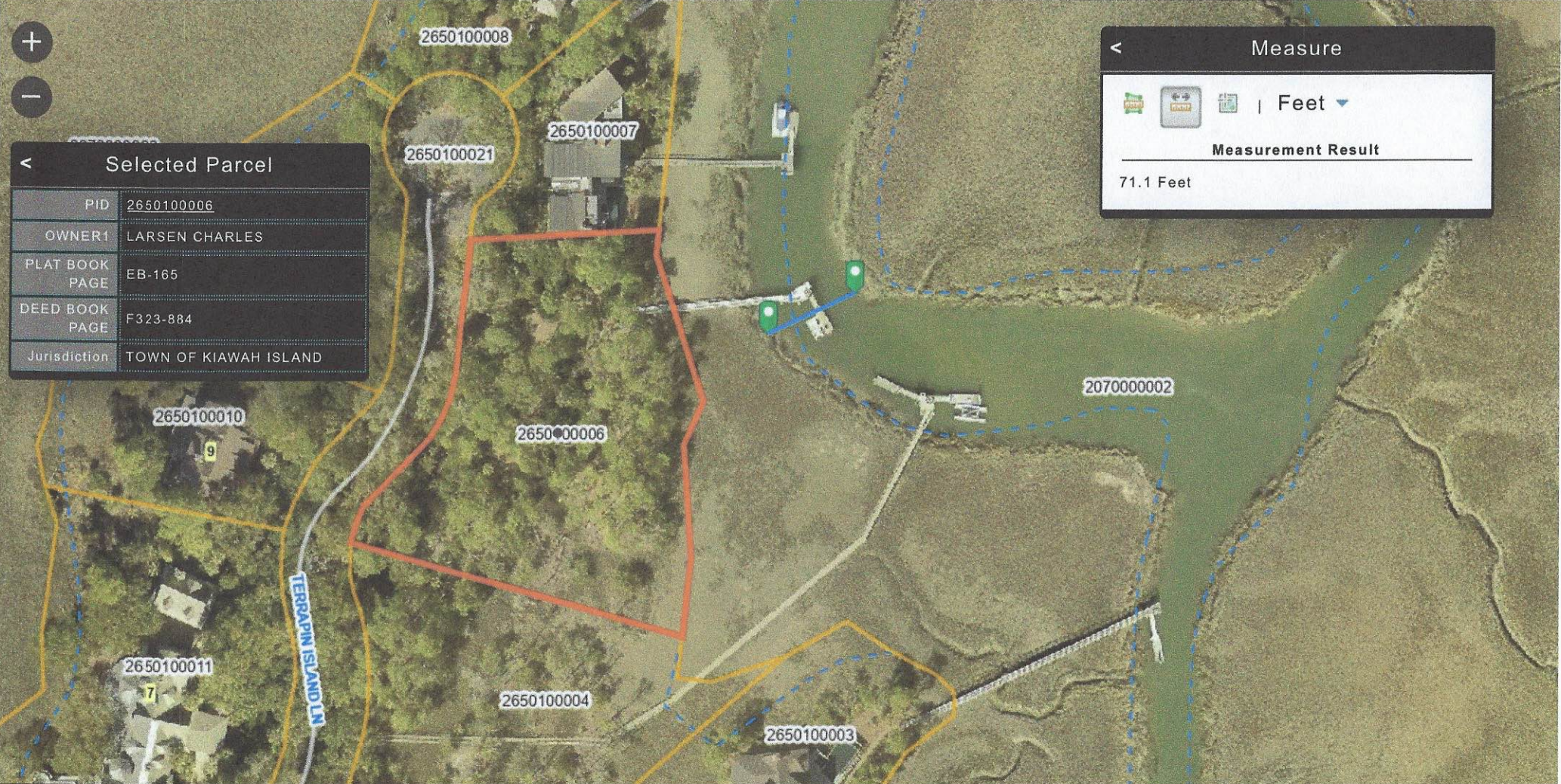
Feet

Measurement Result

69.7 Feet



13 TERRAPIN ISLAND LANE, JC X



Selected Parcel

PID	2650100006
OWNER1	LARSEN CHARLES
PLAT BOOK PAGE	EB-165
DEED BOOK PAGE	F323-884
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

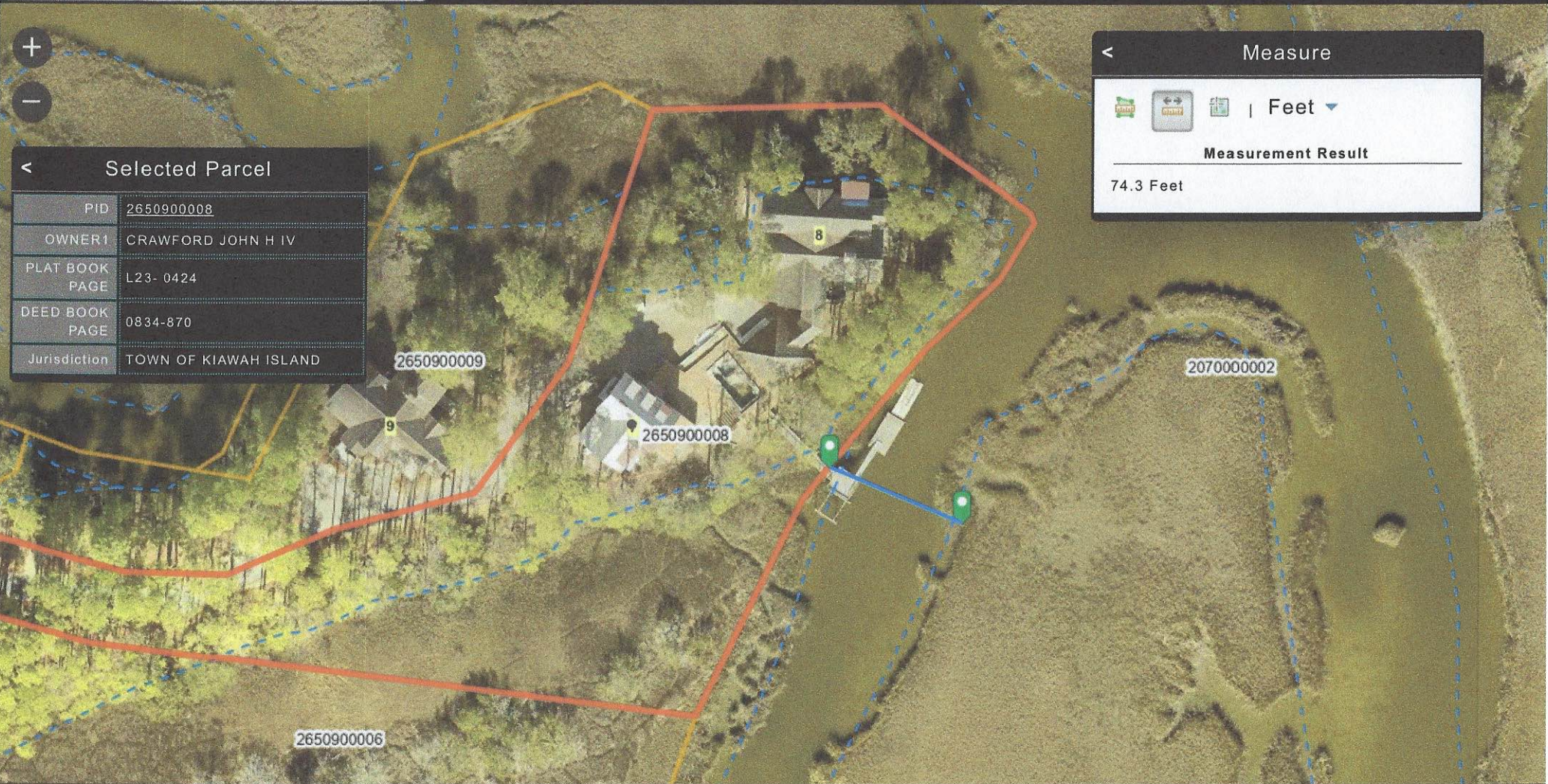
Feet

Measurement Result

71.1 Feet



7 CLUB COTTAGE LANE, JOHN X



Selected Parcel

PID	2650900008
OWNER1	CRAWFORD JOHN H IV
PLAT BOOK PAGE	L23- 0424
DEED BOOK PAGE	0834-870
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

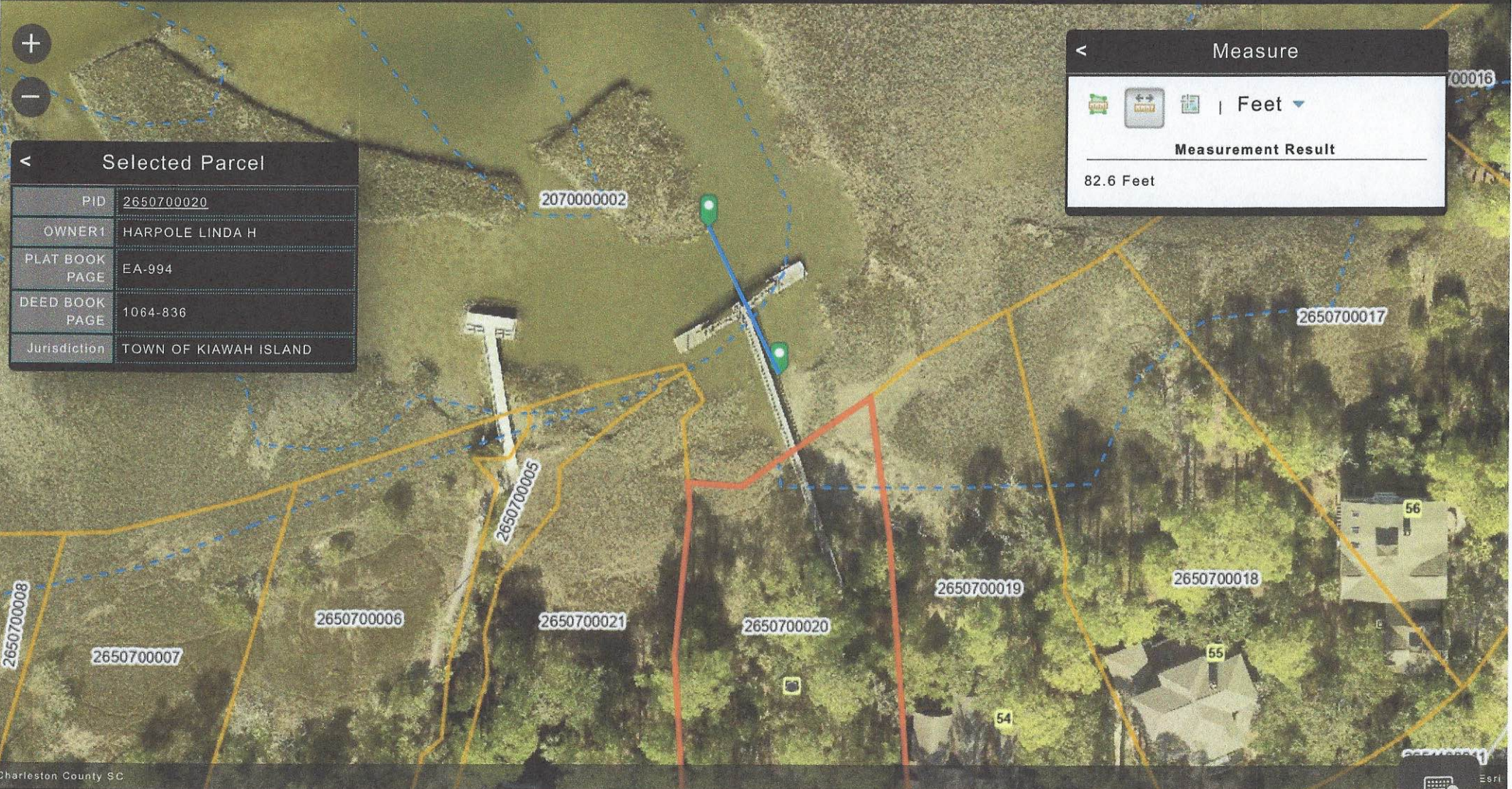
Feet

Measurement Result

74.3 Feet



53 SALT CEDAR LANE, JOHNS X



Selected Parcel

PID	2650700020
OWNER1	HARPOLE LINDA H
PLAT BOOK PAGE	EA-994
DEED BOOK PAGE	1064-836
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

82.6 Feet

11 TERRAPIN ISLAND LANE, JO X



Selected Parcel

PID	2650100008
OWNER1	BLACKDRUM LLC
PLAT BOOK PAGE	EB-165
DEED BOOK PAGE	V290-423
Jurisdiction	TOWN OF KIAWAH ISLAND


Measure

Feet

Measurement Result

87 Feet




477 LITTLE BEAR WAY, JOHNS 

Selected Parcel

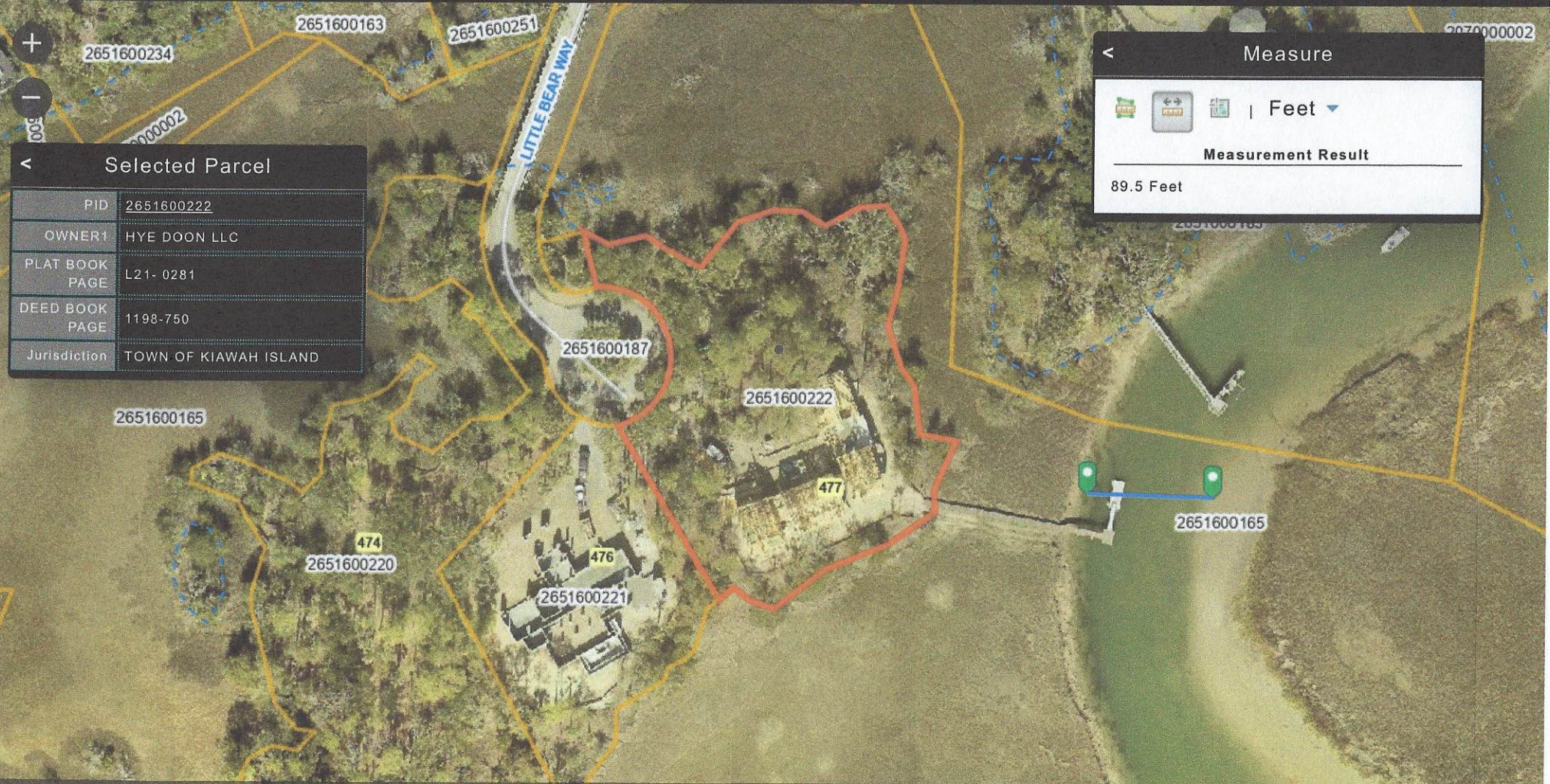
PID	2651600222
OWNER1	HYE DOON LLC
PLAT BOOK PAGE	L21- 0281
DEED BOOK PAGE	1198-750
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

 | Feet

Measurement Result

89.5 Feet



372 Helena court



Selected Parcel

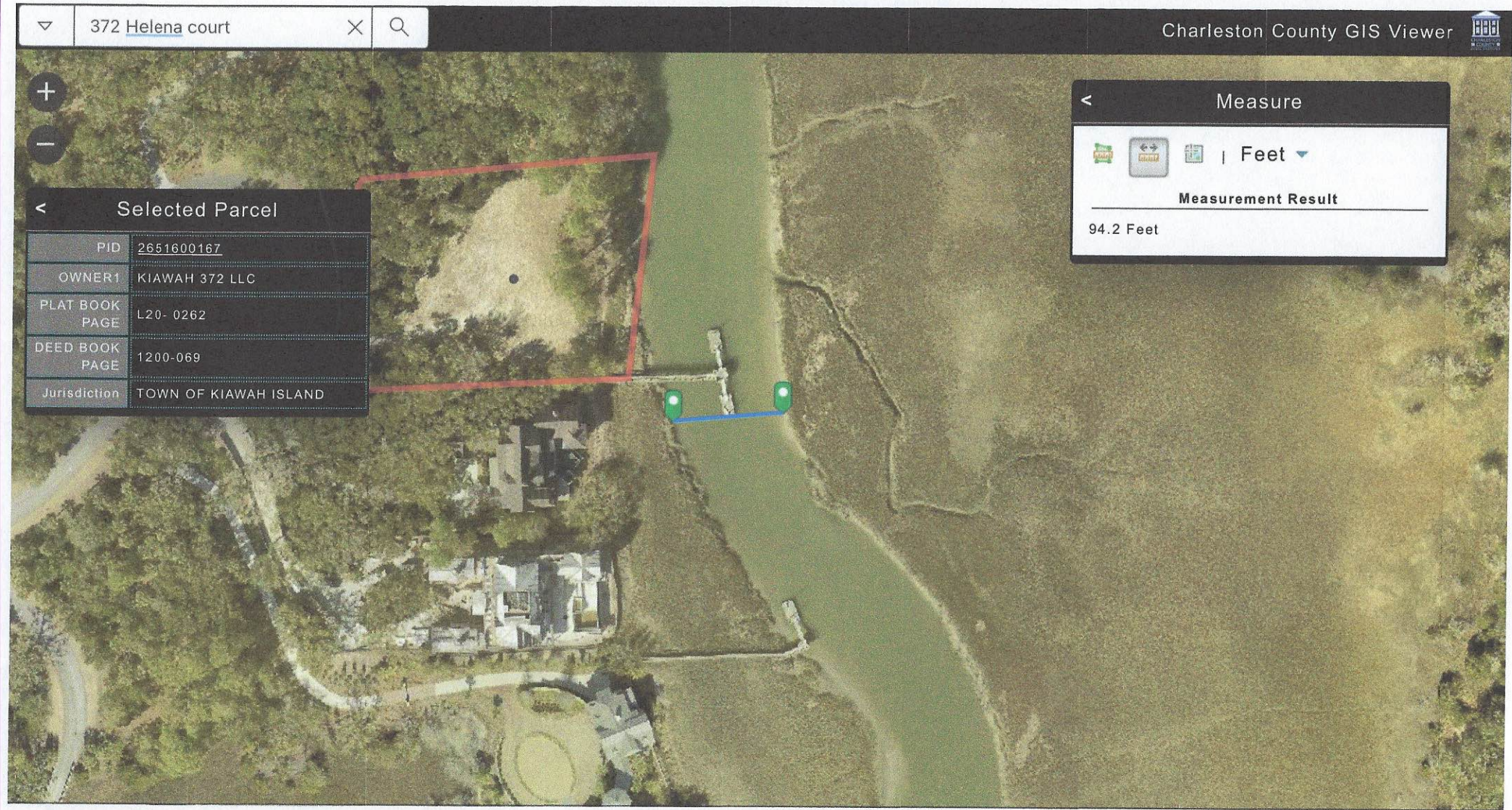
PID	2651600167
OWNER1	KIAWAH 372 LLC
PLAT BOOK PAGE	L20- 0262
DEED BOOK PAGE	1200-069
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

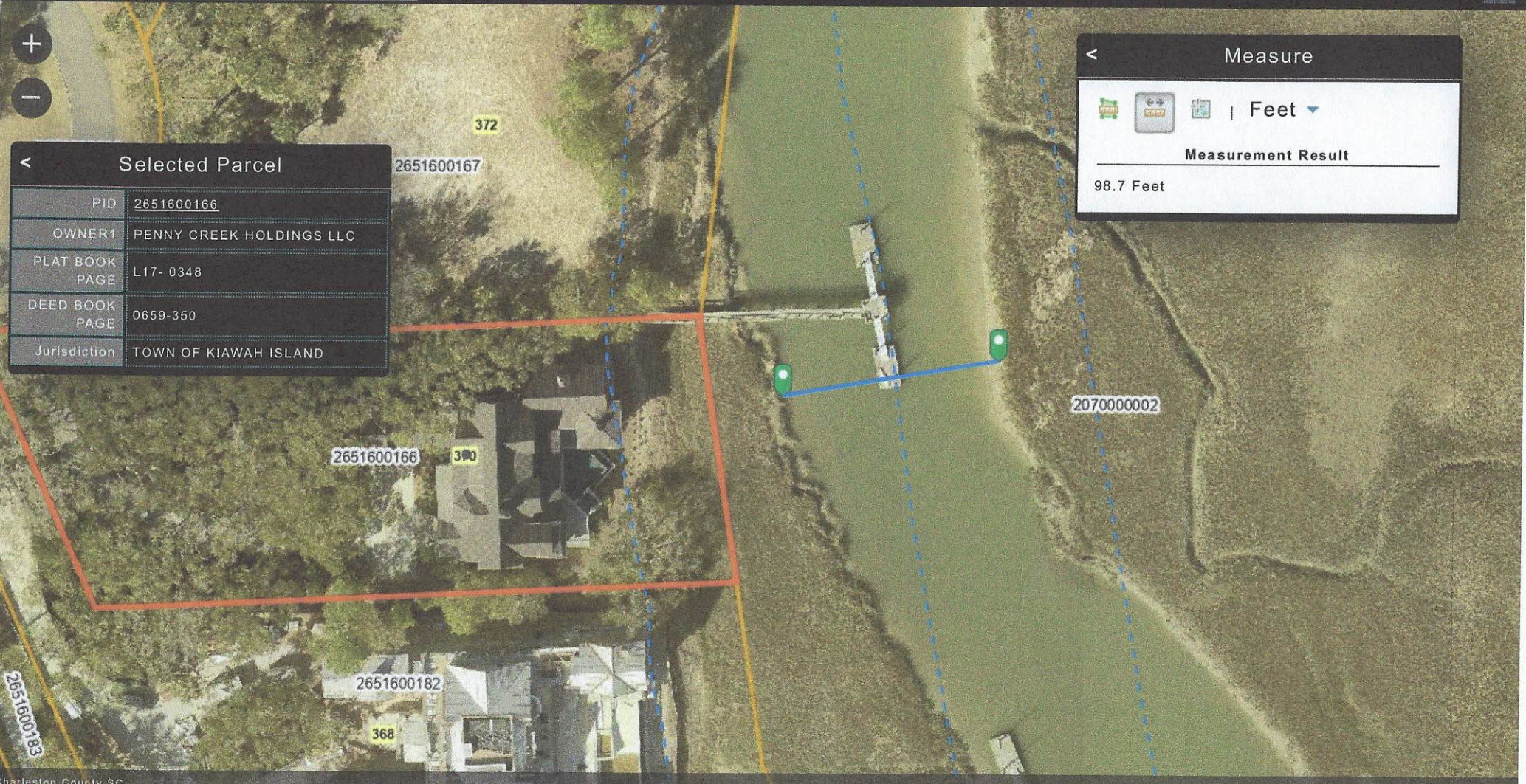
Measurement Result

94.2 Feet





370 HELENA COURT, JOHNS ISLAND



Selected Parcel	
PID	2651600166
OWNER1	PENNY CREEK HOLDINGS LLC
PLAT BOOK PAGE	L17- 0348
DEED BOOK PAGE	0659-350
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

98.7 Feet



7 SUMMER ISLAND LANE, JOH X



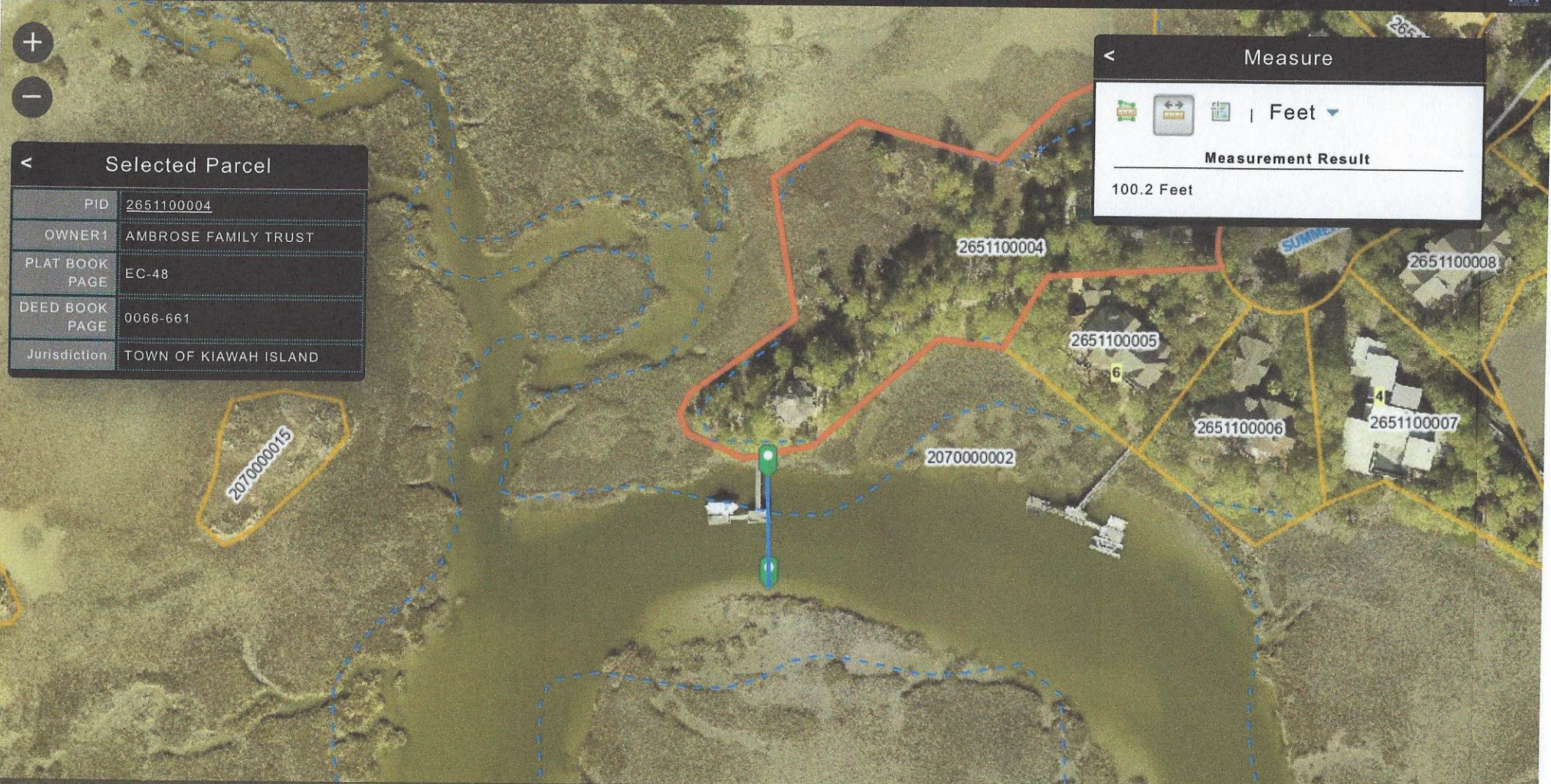
Selected Parcel	
PID	2651100004
OWNER1	AMBROSE FAMILY TRUST
PLAT BOOK PAGE	EC-48
DEED BOOK PAGE	0066-661
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

100.2 Feet





48 blue heron

374 HELENA COURT, JOHNS ISLAND



Selected Parcel

PID	265020
OWNER1	RYMSZ
PLAT BOOK PAGE	EE-636
DEED BOOK PAGE	0908-04
Jurisdiction	TOWN OF

Selected Parcel

PID	2651600181
OWNER1	BONIFACE BARRY L
PLAT BOOK PAGE	L20- 0262
DEED BOOK PAGE	0900-768
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

101.3 Feet



234 EAGLE POINT ROAD, JOHN X



Selected Parcel

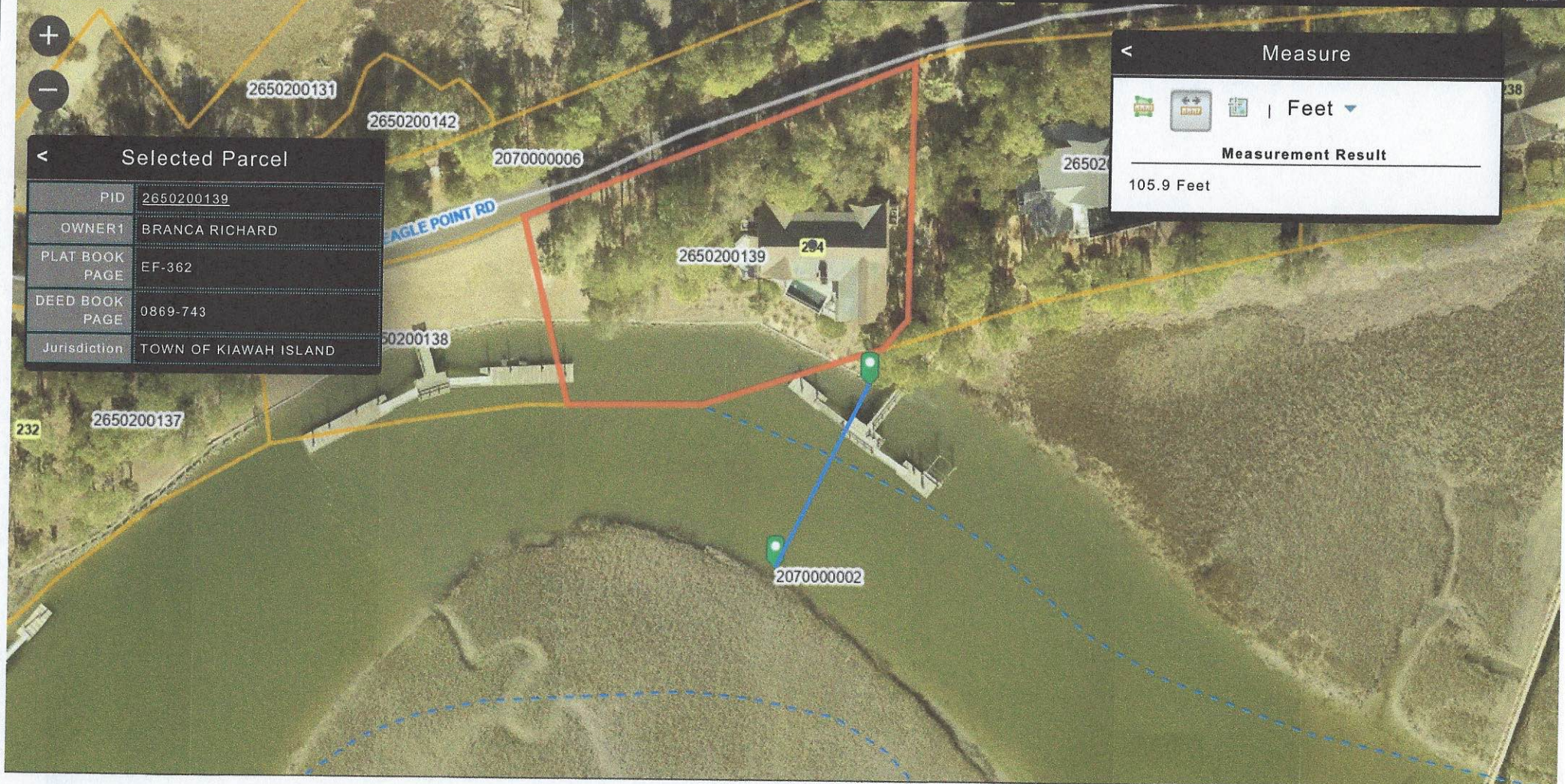
PID	2650200139
OWNER1	BRANCA RICHARD
PLAT BOOK PAGE	EF-362
DEED BOOK PAGE	0869-743
Jurisdiction	TOWN OF KIAWAH ISLAND

Measure

Feet

Measurement Result

105.9 Feet



APPROVAL CRITERIA FOR CODE TEXT AND ZONING MAP AMENDMENTS:

a. **The proposed amendment is consistent with the purpose and intent of the adopted Town of Kiawah Island Comprehensive Plan:**

Response: The proposed text and map amendment is consistent with the purpose of and intent of the adopted Town of Kiawah Island Comprehensive Plan. Specifically, page V-26 of the Sept. 3, 2019 Amended Comprehensive Plan provides that the purpose of Dock Key Locations Ordinance 2003-05 is to control the location and installation of docks to prevent their uncontrolled proliferation along the Island's river and stream frontage. This proposed amendment is consistent with this purpose because the request does not request any new docks but simply requests a change of designation to be consistent with the application of the Ordinance across the many rivers and creeks of the Island. No new docks will be added. A fixed dock is already in place and this amendment is simply to allow the addition of a floating dock. In addition, the proposed reduction of 636.26 feet of fixed dock entitlement in exchange for only 50 feet of floating dock designation also is consistent with controlling the proliferation of docks. The Ordinance also provides design criteria for docks which are met with a floating dock at the proposed location.

Lastly, SCDES regulations allow for up to 240 sq ft of pierhead to be built on the creek fronting 245 Eagle Point due to no potential access via dockage from the opposite side of the creek (See 30-1(D)(50)). The applicant purposefully built less than entitled in order to minimize the impact on the environment and also minimize the impact on the view of the adjacent property owner. This is consistent with the intent of the Comprehensive Plan to minimize the impact on the Island's river and stream frontage.

b. **The proposed amendment is consistent with the purposes and intent of this article:**

Response: The proposed amendment is consistent with the purposes and intent of this article, specifically Section 12-78, Dock Key Locations and the Key Location Map. The proposed amendment seeks to reclassify a fixed dock for a floating dock in a location where all the design criteria within Section 12-78(b)(6) can be met while seeking to eliminate a portion of a Key Location where a dock would not meet the design criteria. Furthermore, a review of the Key Location Map makes clear the intent was to locate floating docks on larger creeks or waterways with sufficient width and depth to allow for suitable boat mooring without restricting navigation. The proposed amendment is consistent with that intent. The width of the creek on the northwest shoreline of the

property is wider and deeper than many properties already entitled to floating docks. In addition, the Key Location Map makes it clear the intent was to locate fixed piers on creeks that are generally less than 50 feet and boat mooring was not reasonable. The creek on the northwest shoreline of 245 Eagle Point is sufficiently wide enough to meet all the requirements of both the Town and SCDES in terms of a floating dock and also wider than many creeks where floating docks are currently allowed.

c. The purpose of the proposed amendment is to further the general health, safety, and welfare of the Town of Kiawah Island:

Response: The proposed amendment satisfies the above requirement by complying with the goals of the Comprehensive Plan and the Land Use Planning and Zoning Ordinance of the Town of Kiawah Island.

d. The proposed amendment corrects an error or inconsistency or meets the challenge of a changed condition:

Response: The proposed amendment both corrects an error or inconsistency and also meets the challenge of a changed condition. As shown by a review of the 2001 and 2025 Charleston County GIS maps, the creek on the northwest shoreline of the property has clearly widen since 2001. The creek has grown approximately 32% in width from 79.5 feet to 104.7 feet today. It is also significantly wider than what is depicted on the Key Locations Map from 2005. It also corrects an inconsistency in that there are many properties on Kiawah entitled to floating docks that are located on creeks much smaller than the creek here. In addition, a fixed dock location on this property is inconsistent with all other fixed docks in that all are located on creeks no greater than 50 feet in width. This amendment will both correct these inconsistencies and also meet the challenge of a changed geographic condition due to the 32% growth in the creek width. Lastly, the proposed amendment will also make the property consistent zoning amendment granted to the adjacent property at 248 Eagle Point. To not allow this amendment would be inconsistent.

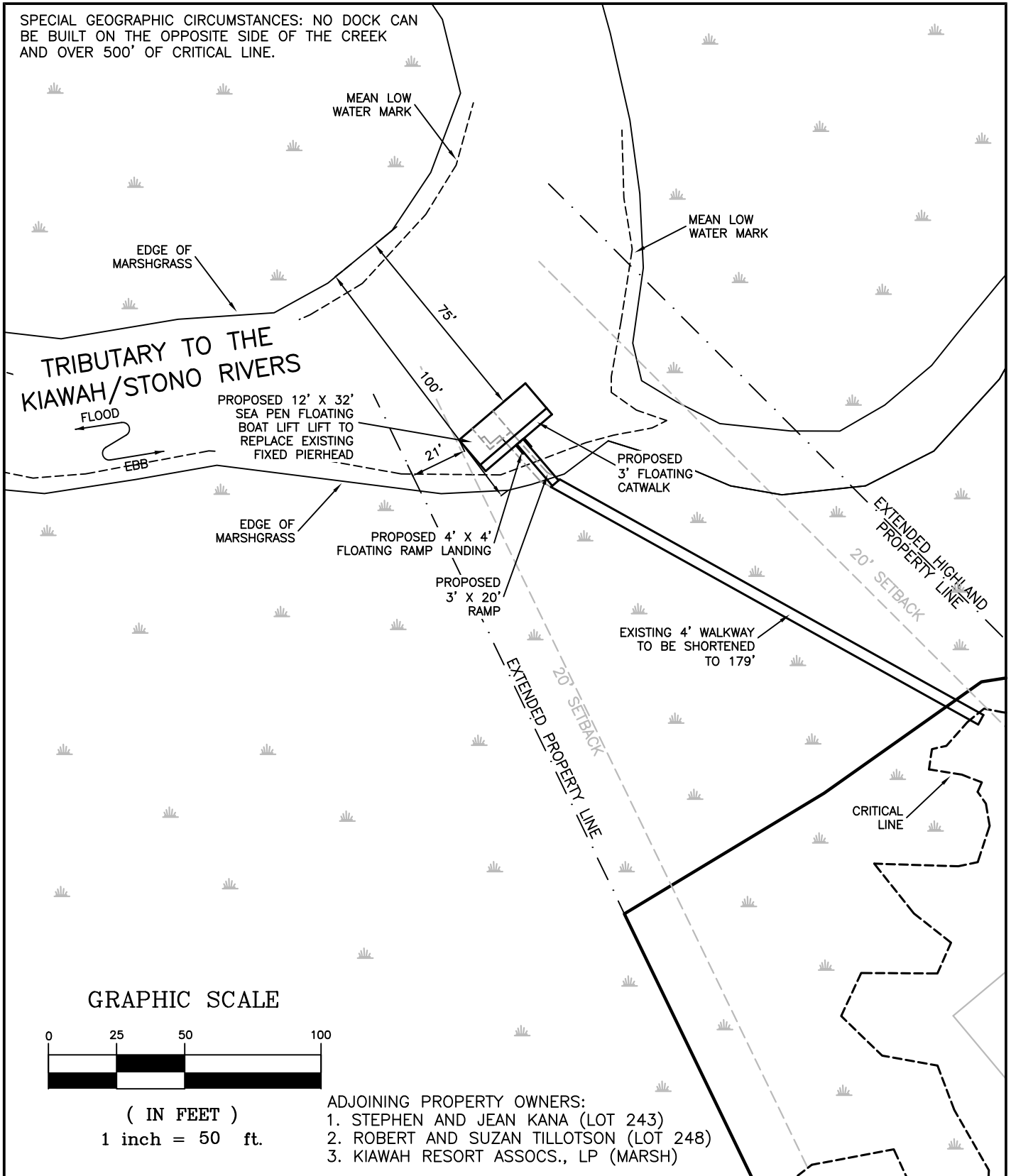
Low Tide
11/1/25
11:00am



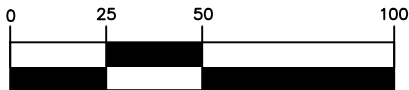
Low Tide
11/1/25
11:00am



SPECIAL GEOGRAPHIC CIRCUMSTANCES: NO DOCK CAN BE BUILT ON THE OPPOSITE SIDE OF THE CREEK AND OVER 500' OF CRITICAL LINE.



GRAPHIC SCALE



(IN FEET)
1 inch = 50 ft.

- ADJOINING PROPERTY OWNERS:
1. STEPHEN AND JEAN KANA (LOT 243)
 2. ROBERT AND SUZAN TILLOTSON (LOT 248)
 3. KIAWAH RESORT ASSOCS., LP (MARSH)

APPLICATION BY:
JONATHAN WEITZ

ADDRESS: 245 EAGLE POINT RD.

DATE: OCTOBER 23, 2025

REVISED:

LOCATION

A PROPOSED
MODIFICATION OF A
RECREATIONAL DOCK AT
245 EAGLE POINT ROAD
LOCATED ON KIAWAH ISLAND
CHARLESTON COUNTY
SOUTH CAROLINA

SHT. NAME

PLAN
VIEW

TMS #265-02-00-167



TOWN OF KIAWAH ISLAND

ORDINANCE 2026-02

An Ordinance to Amend Chapter 12 – Land Use Planning and Zoning Ordinance Article II. Zoning, Division 2. Zoning Map/Districts. Section 12-78. Dock Key Locations to modify the fixed dock designation to allow a floating dock at the subject property 245 Eagle Point Road, Kiawah Island, SC. (TMS# 265-02-00-167)

WHEREAS, the property owner has applied for an amendment to Section 12-78 that would allow a "Floating Dock" rather than a "Fixed Dock"; and

WHEREAS, the Town of Kiawah Island amends the text of Chapter 12 Land Use Planning and Zoning of The Town of Kiawah Island, South Carolina Zoning Ordinance, By Amending Article II, Division 2. Zoning Map/Districts Section 12-62. – Zoning Map; and

WHEREAS, the text amendment would be consistent with the purposes and intent of the adopted Comprehensive Plan and would not be detrimental to the public health, safety, and welfare of the Town of Kiawah Island; and

WHEREAS, the Planning Commission held a meeting on December 3, 2025 at which time a presentation was made by staff, and an opportunity was given for the public to comment on the text amendment request; and

WHEREAS, the Planning Commission, after consideration of the staff report, subsequently voted to recommend to Town Council that the proposed amendment be approved; and

WHEREAS, Town Council held a Public Workshop on January 6, 2026 providing the public an opportunity to comment on the proposed amendment.

NOW, THEREFORE, BE IT ORDERED AND ORDAINED BY THE COUNCIL OF THE TOWN OF KIAWAH ISLAND, SOUTH CAROLINA, AND IT IS ORDAINED BY THE AUTHORITY OF SAID COUNCIL.

Section 1 Purpose

The purpose of this Ordinance is to amend Chapter 12 - Land Use Planning and Zoning Ordinance to amend Section 12-78. Dock Key Locations to modify the fixed dock designation to allow a floating dock at the subject property 245 Eagle Point Road, Kiawah Island, SC. (TMS# 265-02-00-167)

Section 2 Ordinance

- (1) The Town hereby amends Sec. 12-78. Dock Key Locations as shown in the attached **“Exhibit A”** which is hereby incorporated herein by reference.

Section 3 Severability

If any part of this Ordinance is held to be unconstitutional, it shall be construed to have been the legislative intent to pass said Ordinance without such unconstitutional provision, and the remainder of

said Ordinance shall be deemed to be valid as if such portion had not been included. If said Ordinance, or any provisions thereof, is held to be inapplicable to any person, group of persons, property, kind property, circumstances or set of circumstances, such holding shall not affect the circumstances or set of circumstances, such holding shall not affect the applicability thereof to any other persons, property, or circumstances.

Section 4 **Effective Date and Duration**

This Ordinance shall be effective upon its enactment by Town Council for the Town of Kiawah Island.

PASSED, APPROVED, AND ADOPTED BY THE COUNCIL FOR THE TOWN OF KIAWAH ISLAND ON THIS XX DAY OF XXXX, 2026.

Bradley D. Belt, Mayor

ATTEST:

By: _____
Petra Reynolds, Town Clerk

1st Reading: January 6, 2026

2nd Reading:

Sec. 12-78. Dock key locations.

- (a) *Purpose and intent.* Kiawah Island is bordered by the Atlantic Ocean on the south, and the Kiawah and Stono Rivers on the north and east, respectively. Creeks, streams and marsh are also an integral part of Kiawah Island's ecosystem.
- (b) *Key locations.* Key locations are specific shoreline and marsh sites where floating and fixed docks are permitted to be constructed. The purpose and intent of this key location zoning is to strictly control location and installation of all docks, floating and fixed, so as to prevent their uncontrolled proliferation along Kiawah Island's river and stream frontage. Permitted dock locations and general design criteria are as follows:
 - (1) The Town of Kiawah Island Key Locations Map, dated April 1, 2003, shows all sites where authorized docks currently exist or may be permitted to exist in the future. Table 2N, Town of Kiawah Island Key Locations Floating Docks, and table 2O, Town of Kiawah Island Key Locations Fixed Docks, both dated April 1, 2003, and set forth in subsection (b)(7) of this section provide detailed information as to current and future docks. These are the Town's official zoning documents and are kept at the Town's municipal offices. The maps and the tables show and detail the specific locations of installed docks on developed lots by identifying lot number and dock type. For property not yet platted, linear footage of shoreline is shown where construction of future docks may be authorized. In addition to these official documents, the Town will catalog new docks as they are installed at undeveloped key locations. This information will be periodically incorporated into the official key locations map.
 - (2) Two basic types of docks are authorized using alphanumeric coding. Authorized dock sites identified by letters (e.g., A, F, AA, etc.) are predesignated to be fixed docks. These are generally intended for fishing and crabbing and have no movable parts to them. Authorized dock sites identified by numerals (e.g., 3, 12, 21, etc.) are predesignated to be floating docks. These normally have a separate floating pontoon or platform attached to them, which rises and falls with the tides. Floating docks are suitable for mooring small watercraft.
 - (3) The Town of Kiawah Island Key Locations Map (set forth in section 12-62) and the two tables of the Town of Kiawah Island Key Locations (set forth at the end of this section), used in conjunction with one another, describe the dock type and lot numbers of authorized and in-place dock locations. True orientation of floats attached to floating docks is shown on the map. Floats on both sides at the end of a single pier usually indicate a pier structure shared by two adjacent lots with separate floats provided for each lot owner. Undeveloped shorelines authorized as future key location dock sites are shown by color-coding on the maps to indicate dock type, with authorized shoreline given in linear feet in the tables.
 - (4) For undeveloped properties and subdivisions where platting is not complete, a developer may, with approval of the Planning Commission, trade-off linear footage of shoreline from one permitted location to another permitted location with no net gain in total authorized footage. Further, transfer of footage may not cause a key location to be lengthened by more than 50 percent. In a trade-off event, the developer borrows from one key location to supplement another key location that does not have sufficient linear footage to meet development requirements. Some trade-offs which have occurred in the past resulted in the deletion of key locations once authorized in the original key location ordinances No. 91-2 and 92-1. These deletions are identified and described on both the map and in the tables.
 - (5) It is the intent of this article that construction of community docks, subdivision (neighborhood) docks, and joint use docks shared by adjacent lot owners be encouraged versus a single installation per lot. This approach serves to minimize the ultimate number of docks built and is more environmentally compatible.

- (6) The following criteria shall be applied in the design of any authorized dock structure:
- a. *Overall dock length.* No dock shall be erected greater than 600 linear feet in length.
 - b. *Float design.* Floats attached to such docks shall be limited in size and configuration as the South Carolina Department of Health and Environmental Control's Office of Ocean and Coastal Resource Management (DHEC/OCRM) and the U.S. Army Corps of Engineers shall permit.
 - c. *Spacing between adjacent docks.* The minimum distance between adjacent docks shall be 150 feet. However, for adjacent key locations properties on river or stream bends, the waterside terminus of adjacent docks may be at a minimum distance of 75 feet.
 - d. *Maximum extension of the dock structure into a river, stream, or channel.* The leading edge (edge nearest the river, stream or channel center) of a pier head and/or float structure shall not extend out into a river or stream more than one-quarter of the river or stream width measured at mean low water, or 50 feet, whichever is less. This projection is to be measured from the water's edge at mean low water.
 - e. *Minimum river or stream width.* No dock shall be erected, whether an authorized key location or not, if the stream or river on which it is to be erected is 25 linear feet or less in width measured from the marsh grass edge on one bank to the marsh grass edge on the opposing bank directly across the waterway.
- (7) The following approvals shall be required before construction on any dock can proceed:
- a. *Town of Kiawah Island.* An initial written request to construct shall be submitted to the Town of Kiawah Island Planning Director prior to any other requests being made. The intent is to confirm to the lot owner whether, in fact, the proposed site is a key location before the lot owner spends time and money in developing drawings, etc., for a nonviable project.
 - b. *Design approval by DHEC/OCRM and the Town of Kiawah Island.* The second step shall be for the applicant or his contractor to submit dock design to DHEC/OCRM using the appropriate forms and following accepted procedures. During this process, the Town of Kiawah Island will have an opportunity to review the design prior to DHEC/OCRM returning the approved or disapproved application to the applicant. No construction shall start until this approval is forthcoming.

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use
100	Beachwalker Park		TBD	Beachwalker Park
	Inlet Cove		1	Inlet Cove Neighborhood Dock ^(c)
600	Kiawah River Commons		TBD	Kiawah River Commons
400	Little Rabbit		TBD	Little Rabbit
1,200	Mingo Point		1	Mingo Point Commercial Dock ^(d) and Boat Launch
	Old Dock Road		10	Lot Nos. 489, 490, 491, 492, 493, 495, 496, 497, 498 and 499
800	The Settlement West		TBD	The Settlement West
	Rhett's Bluff, North		24	Lot Nos. 29, 30, 31, 32, 33, 34, 35,36, 37, 38, 39, 40, 41, 42, 43, 44,45, 46, 47, 48, 49, 50, 51/52and the Rhett's Bluff Park Community Dock ^(e) and Boat Launch

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9	Capt. Maynard's, N.	280	1	Lot No. 1
10	Capt. Maynard's, S.	930	1	Lot No. 1
11	Rhett's Bluff, South		6	Lot Nos. 7/8, 9/10, 11/12, 13/14, 15/16 and 17/18
12	Vanderhorst House	50	1	Tracts A and B
13	Terrapin Island		6	Lot Nos. 7A/B, 9/10, 11, 12, 13 and 14
14	Preserve, N.E. Tip	100	1	Lot No. 85
15	Cormorant Island, N.		2	Lot Nos. 23/24, and 25/26
16	Eagle Point, Central		5	Lot Nos. 226/228, 230/232, 234/236, 238/240 and the Eagle Point Neighborhood Dock
17	Eagle Point, West Point Dock and Boat Launch	2		Lot Nos. 222/224 and the Eagle
18	Salt Cedar Lane,		1	Lot No. 62 East Tip
19	Salt Cedar Lane, East		2	Lot Nos. 60 and 61
20	Preserve, South		4	Lot Nos. 42, 44/46, 48/50 and the Preserve Neighborhood Dock
21	Salt Cedar Lane, Cent.	500	2	Lot Nos. 57 and 58
22	Salt Cedar, West		2	Lot Nos. 53/54 and the Salt Cedar Community Dock
24	Cougar Island, West	1,150	TBD	Cougar Island, West
25	Cormorant Island, S.		2	Lot Nos. 28/29 and 30/31
26	Cougar Island, W. Tip	300	TBD	Cougar Island, W. Tip
27	Otter Island, East		1	Lot No. 91
28	Summer Islands, East		4	Lot Nos. 12/13, 14/15, 17 and the Summer Islands Neighborhood Dock
29	Summer Islands, West		4	Lot Nos. 1/2, 3/4, 5/6 and 7
30	Otter Island, Savanna Point		3	Lot Nos. 82, 83/84 and 85/86
31	Otter Island Rd., West		2	Lot Nos. 70/71 and 72/73
32	Otter Island Rd., West Tip		2	Lot Nos. 68 and 69
33	Ocean Course Drive	500	1	Lot Nos. 64 and 65
34	Club Cottages		3	Lot Nos. 6, 7 and 8
35	Cougar Island, E. Tip	1,100	TBD	Cougar Island, E. Tip
36	Eagle Point East	200	1	Lot 248
37	Eagle Point North	50	1	Lot 245

(a) Numerals indicate floating docks and letters indicate fixed docks.

(b) Numerals with slash, e.g., " 21/22" typically indicates that two lots share a single dock.

(c) Neighborhood docks serve just the local area or regime.

(d) Commercial dock is owned by Kiawah Island Golf Resort.

(e) Community docks are KICA property and serve the entire island.

Key Location		Authorized Shoreline (linear ft.)	Docks Authorized	
Designation ^(a)	Location		Nos.	Site ^(b) /Use

DRAFT 01.06.2026

A	Old Dock Rd./Ruddy Turnstone		6	Lot Nos. 500, 512, 513, 514, 515 and 517
B	The Settlement, East	1,050	TBD	The Settlement, East
C	Bass Pond, East		1	Bass Pond Community Dock ^(c)
D	Terrapin Island		1	Lot No. 15
E	Blue Heron, North		1	Lot No. 158
G	Eagle Point, East	600-200	TBD	Eagle Point, East
H	Falcon Point Rd., East		1	Lot No. 67
J	Blue Heron, West		1	Blue Heron Community Dock
K	Cougar Island, West	250	TBD	Cougar Island, West
O	Falcon Point, East		1	Falcon Point Neighborhood Dock ^(d)
R	Shell Crk. Lndg., East		1	Lot No. 5
S	Shell Crk. Lndg., S		2	Lot Nos. ½ and ¾
T	Club Cottages		3	Lot Nos. 9, 10 and the Club Cottage Neighborhood Dock
U	Marsh Cottages		2	Lot Nos. 25/26 and the Marsh Cottages Neighborhood Dock
V	Ocean Oaks		1	Ocean Oaks Neighborhood Dock
W	Ibis Pond		1	Ibis Pond Community Dock
X	Willet Pond		1	Willet Pond Community Dock
Y	Blue Heron, North	800	TBD	Blue Heron, North
Z	Osprey Entry		1	Canvasback Pond Community Dock
AA	Bass Pond, West	100	TBD	Bass Pond, West
BB	Egret Pond		1	Egret Pond Community Dock
^(a) Numerals indicate floating docks and letters indicate fixed docks.				
^(b) Numerals with slash, e.g., " 21/22" typically indicates that two lots share a single dock.				
^(c) Community docks are KICA property and serve the entire Island.				
^(d) Neighborhood docks serve just the local area or regime.				

(Code 1993, § 12A-219; Ord. No. 2005-08, § 12A-219, 10-12-2005; Ord. No. 2012-5, §§ 1, 2, 10-2-2012; Ord. No. 2018-02, § 2(atts. A, B), 5-1-2018)



TAB 10

TOWN COUNCIL

Agenda Item

2026

ARTS & CULTURAL EVENTS COUNCIL

*Committee members are appointed by the Town Council and serve one-year terms.
All terms expire on January 31.*

David Wohl, Chairman

157 Governors Drive
Kiawah Island, SC 29455
304-552-9060 cell
Dwohl23@gmail.com

Bill Blizard

736 B Virginia Rail Road
Kiawah Island, SC 29455
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billblizard@gmail.com

Becky Hilstad

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jrush25@comcast.net

Joan Collar

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Kiawah Island, SC 29455
843-768-0474
843-224-9455 cell
jcfromsc@aol.com

Kristin Thompson

101 Shoolbred Court
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443-254-8616 cell
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Dylan Keith

4752 Tennis Club Lane
Kiawah Island, SC 29455
843-885-4077 cell
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Kimberly Adele

4752 Tennis Club Lane
Kiawah Island, SC 29455
843-885-4072 cell
info@cirqueduo.com

Rob Cushman

181 Kiawah Island Club Road
Kiawah Island, SC 29455
203-247-8374
Rcshmn@gmail.com

***Aideen Mannion**

3000 Southern Pines Lane - work
Kiawah Island, SC 29455
202-553-2465 cell
aideenmannion@yahoo.com

***Jack Barnett**

557 Black Duck Court
Kiawah Island, 29544
212-755-2141 Cell
rjkbarnett@aol.com

Caroline Wall

Arts & Cultural Events Program Manager

4475 Betsy Kerrison Parkway
Kiawah Island, SC 29455
843-768-9166
(c) (843) 834-2128
cwall@kiawahisland.org

- New Members to be appointed

Brad Belt, Mayor
Arts Council Board Chairman

4475 Betsy Kerrison Parkway

Kiawah Island, SC 29455

843-768-9166

bbelt@kiawahisland.org



TOKI

Application for Appointment

It's important to note that individuals serving on Boards, Committees, or Commissions are required to be residents or property owners of Kiawah Island. Before completing the application, please read the *Volunteer Guidelines* (pg. 3-4) of this form.

Appointment(s) Sought:

Complete this application using the on-line fillable form or print it and fill in manually. Please list the Board(s), Commission(s), or Committee(s) you are applying for:

_____	_____
_____	_____
_____	_____
_____	_____

Name: _____

Kiawah Address: _____

Current Employment Information: Retired:

Occupation: _____ Employer: _____

Phone: (H) _____ (W) _____ (C) _____

Email Address: _____

- Full-time Resident
 Part-time Resident
 Non-Resident

Kindly respond to the inquiries on the next page to provide the Town Council members with more details about your desire to serve. Your presence at the Council meeting is welcome if your application is under review. You will receive advanced notice of the meeting date and time.

Return all completed and **signed** forms in person to Petra Reynolds, Town Clerk at 4475 Betsy Kerrison Parkway, OR email them to her at preynolds@kiawahisland.gov. If you have any questions, please contact her directly at 843-768-5101.

I have read the attached *Volunteer Guidelines* and understand my commitment to them should my application be approved.



TOKI

Application for Appointment | Page 2

Please write legibly. You can add more details if needed. Your input will go to the Town Council for review.

1. What unique experiences or perspectives would you bring to this role?

2. If you are chosen, what particular impact do you want to have through your contributions?

3. Briefly describe your participation in community service or activities.

4. Which community topic(s) matter to you and align with the board or committee you want to join?

5. Are you presently affiliated or have you previously been involved with a TOKI, KICA, or Charleston County Board or Commission? If yes, which one(s) and during with period?

Signature: _____

Date: _____

Unless otherwise provided by law, you serve at the pleasure of Town Council and all appointments are subject to the ethics, government accountability, and campaign reform act, SC Code Ann. Section 8-13-10 Et Seq, and any member appointed to a board or commission whose action is inconsistent or may be perceived to be inconsistent with the spirit or intent of the act may be subject to removal. By signing this document, you acknowledge that you may be subject to a background investigation, including, but not limited to a criminal history, driving record, and credit check.

AIDEEN MANNION
+1.202 553.2465 aideenmannion@yahoo.com

SUMMARY OF QUALIFICATIONS

Ms. Mannion is a senior level economic development professional with 25+ years' experience leading numerous country offices and US-based technical assistance teams in market-led, inclusive development; with particular focus on market systems, tourism, agriculture, enterprise development, green economy, investment and trade promotion, access to finance, and business services development in local contexts to promote competitiveness in regional and international markets. She has led business development and technical teams on information gathering, analyses, stakeholder engagement, partnership development, and outreach for a multitude of donors and private clients to inform technical design, proposal development, and project implementation. She has led strategic planning, built and managed a multi-donor opportunity pipeline, and has developed new and upgraded systems to support business development and project implementation systems, processes, and management, including training. She is a dual national (US and Ireland) with experience in more than 30 countries across Africa, Asia, the Caucasus, and Central and Eastern Europe.

PROFESSIONAL EXPERIENCE

Creative Associates, Chevy Chase, MD
DIRECTOR, BUSINESS DEVELOPMENT, ECONOMIC GROWTH DIVISION
(November 2022 – February 2025)

Oversaw strategy, pipeline development, partnership development, and technical quality of business development for the Economic Growth Division. Provided technical leadership, best practices, market analyses, and client insights to enhance thought leadership, corporate positioning, strategic partnerships, and Capture/proposal quality. Led field stakeholder engagement and partnership development. Coached and guided capture and proposal teams. Served as technical reviewer of EG and cross-divisional proposals. Led Capture and Technical Proposal design and Lead Writer of several opportunities. Managed EG BD resourcing and development of concepts for divisional and cross-divisional opportunities. Member of EG leadership team. Coordinated with other technical divisions and corporate support offices to promote technical and knowledge exchange and collaboration.

Various clients (International development sector)

INDEPENDENT CONSULTANT, Arlington, VA (August 2019 – November 2022)

Select assignments included: technical proposal, RFI, BAA, and Concept Note design and writing; leadership on Capture efforts and systems/process design and training for staff on Capture; technical reviews; business development-related strategic planning (annual and on-going), BD systems assessment, and systems development, upgrades, and training of staff on capture and technical writing templates, materials, research, and more; monitoring (new business); pipeline management; and leadership on select global USG and other donor opportunities on all aspects of analyses, local stakeholder partnership development, technical design, and proposal delivery. Authored numerous winning concept notes and proposals, and technical trainings for key implementers.

Dexis Consulting Group, Washington, DC

DIRECTOR, AGRICULTURE (November 2018 – July 2019); **SENIOR TECHNICAL ADVISOR/DEPUTY DIRECTOR, AGRICULTURE** (June 2017 – November 2018)

Oversaw programming and business development initiatives in agriculture and economic growth practice, including capture, technical design and strategy, partnerships, proposal development, and marketing on Feed the Future, World Bank/IFC, DFID, and USAID Economic Growth initiatives on agriculture, market systems, investment, trade and more in Africa, Asia, and Central and Eastern Europe. Collaborated with senior management on long-term pipeline and strategic positioning on USAID, DFID, World Bank/IFC, other multilateral and private client initiatives. Developed original templates and training on Capture and select business development related topics and contributed to the development of project start-up/close-out guidebooks for the quality assurance unit (QMS).

FHI 360, Washington, DC

TECHNICAL ADVISOR (June 2015 – June 2017)

Served as technical advisor on livelihoods and economic strengthening initiatives and on all aspects of related business development strategy, opportunities, and outreach for FHI 360's Social and Economic

Development unit. Project Director for USAID/Ukraine Public Private Partnerships (P3DP), and DOS/USAID/LA IDEA – Latin American Partnerships projects. As Director for the \$21M USAID/Ukraine P3DP project, worked with public and private stakeholders to improve the legal and institutional framework for PPPs, facilitate the set-up of pilot PPPs across municipalities, and develop public awareness of PPPs.

SNV USA, Bethesda, MD

DIRECTOR OF PROJECTS (December 2013 – June 2015)

Oversaw portfolio of 18 USAID, DOS and various US-foundation funded projects (total valued of \$50 million) being implemented by SNV country teams in Africa and Asia. Developed framework and created original tools for and provided support to field staff on capacity building and quality assurance on all aspects of donor-related project management including systems, monitoring, deliverables, donor regulations, and budgetary and financial management. Assured compliance with donor and prime regulations and best practices. Liaised with donors and project partners. Developed new database, templates, and content for detailed project past performance and corporate qualifications,

Development and Training Services (dTS), Inc., Arlington, VA

DIRECTOR OF CORPORATE ASSURANCE UNIT and DIRECTOR OF NEW BUSINESS SERVICES
(Consultant, September 2012 – May 2013)

Oversaw development of organization-wide quality assurance protocols/tools, and led strategic planning, market research, marketing, communications, external relations and communications, and knowledge management. Developed database for project information/past performance and corporate qualifications. Led senior business development meetings. Organized company-wide trainings and informational sessions. Supervised recruitment team. Member of senior executive management team.

Cardno Emerging Markets USA, Ltd, Arlington, VA

DIRECTOR, BUSINESS DEVELOPMENT UNIT (October 2011 – September 2012)

Led and oversaw strategic communications, eminence building, production, knowledge management and quality assurance of the business development process from capture through proposal delivery. Led semi-annual and specialised strategic planning sessions for practices and practice directors on range of business development related issues, tracked annual donor funding trends, conducted monthly analyses of BD performance, facilitated linkages for potential partnership opportunities, conducted marketing trips and outreach activities. Member of executive management team. Managed team of 7.

SENIOR MANAGER, BUSINESS DEVELOPMENT GOVERNANCE AND ECONOMIC GROWTH
(December 2010 – September 2011)

Responsible for the entire life-cycle of the business development process from early identification, capture management, marketing, and proposal management for Governance and Economic Growth (GEG) opportunities. Work with senior management on strategic planning and priority making initiatives, facilitated process for proposal development, conducted donor-related and field marketing/assessment trips, fostered relationships with potential partners and staff/consultants, and provided guidance and training to staff on business development related tools and mechanisms.

Microfinance Opportunities (MFO), Washington, DC

DIRECTOR, FINANCIAL EDUCATION (October 2009 – December 2010)

Supervised and managed multiple large-scale grant and fee-for-service programs. Assessed and implemented management systems and templates to increase efficiency. Prepared, managed and monitored budget resources across all projects and managed team of financial education trainers. Responsible for program development and donor reporting and deliverables. Led annual strategic planning, assisted proposal preparation, and developed marketing materials and press releases. Managed 5 full-time staff and 4 long-term consultants.

Global Sustainable Tourism Alliance (GSTA), Washington, DC

COORDINATOR (January 2008 – October 2009)

Oversaw administrative coordination of all LWA Washington-based activities and select field-based functions and created templates and tools for field office program implementation and operations. Led Management Board meetings, mobilized and managed GSTA and local consultant teams, oversaw program

implementation and reporting requirements for several country programs. Wrote reports, concept papers, and success stories. Led technical proposal development and strategic partnerships.

**Volunteers for Economic Growth Alliance (VEGA), Business and Trade Development (BTD)
Sofia, Bulgaria**

(direct hire of International Executive Service Corps (IESC)

CHIEF OF PARTY (May 2004 – January 2006); **PROGRAM ADVISOR**, (February – July 2006)

Established VEGA's first international field office to strengthen Bulgarian business support organizations (BSOs) and consultants' capacity and promoted investment through the use of short-term international and local consultants, long-term advisors, conferences/workshops/training events, study tours and a small grants (25) program. Conducted and co-authored two assessments of local BSO and rural tourism sectors. Designed and oversaw implementation of all technical assistance activities, study tours, training seminars/workshops and investment events, as well as all field office administrative, financial, staff development/training, marketing and program related management tasks, outreach and relations with USAID, other international donors and projects, governmental and local NGO and private sector stakeholders. Managed a budget of 3.0 million USD, with an additional 1.2 million USD awarded for creation of a new program division in Year Two. Prepared all USAID work plans, reports, M&E plans, and deliverables. Designed concept and full program for biotechnology investment conference, resulting in the establishment of a national Biotechnology Association as well as in a one million USD investment in a local company. Achieved 3-year USAID cost-share target in first 18 months. Received highest (excellent) rating in mid-term evaluation, with special commendation for rapid start-up and inventiveness in program design.

Financial Services Volunteer Corps (FSVC), Warsaw, Poland

CHIEF OF PARTY/REGIONAL DIRECTOR - FSVC (December 2002 – April 2004)

Identified, developed and implemented more than 28 technical assistance and training projects in 8 EU accession candidate countries under USAID's Partners for Financial Stability (PFS) II program in areas of accounting/audit, anti-money laundering/financial crimes, commercial banking, central banking, capital markets, insurance and pension reform. Structured demand-driven projects to address specific needs and recruited senior financial sector practitioners to deliver targeted training and assistance and structured study tours to the UK, US and other CEE countries. Managed 800,000 budget and all field office administration, reporting, work plans, consultant SOWs, and marketing materials, and secured additional funding through the US Department of State to expand programming. Liaised with Economic Officers at 8 US Embassies. Worked with other field offices to develop cooperative projects in the region, recruiting local institutional counterparts to serve as technical advisors to FSVC's Balkan project beneficiaries in the banking sector.

International Executive Service Corps (IESC), Stamford, Connecticut

PROGRAM GROUP DIRECTOR – ARMENIA AND BALKANS (May 2001 – November 2002)

Administrative, financial and program management of USAID-funded competitiveness initiatives, focused on agriculture, ICT, and in particular on tourism (infrastructure/policy, tourism product, festival/event, and tourism information center development; as well as hospitality, marketing, and entrepreneurship training/M/SMA development, and more), in Armenia, and a regional CEE-TRADE program on capacity building of local business support organizations and companies to promote regional trade linkages in Croatia, Romania, Bulgaria, and Hungary. Assisted in organization and leadership of first international tour operators' familiarization trip to Armenia, as well as participation in first international trade shows (Berlin, London). Led assessment of middle, southern and northern Armenia to identify new products and tourism needs. Supported first Armenian stakeholder study tour to Scotland. Member of team to trade show in Las Vegas.

Financial Services Volunteer Corps (FSVC), Warsaw, Poland

CHIEF OF PARTY/COUNTRY DIRECTOR – POLAND (July 1997-July 1998)

Identified, designed, and implemented more than 24 technical assistance projects, training and study tour activities in public finance, central and commercial banking, capital markets development, insurance, and pension reform. Liaised with governmental and financial institution officials, USAID and other international and donor organizations. Researched and wrote country-specific political and economic analyses. Led all field office financial, administrative and programmatic operations.

Financial Services Volunteer Corps (FSVC), New York, NY

PROGRAM OFFICER FOR UKRAINE AND MOLDOVA (September 1996-July 1997)

Supported field office in implementation, and preparation of grants, and all project reports. Led recruitment of U.S. private and public financial institutional experts, and managed all aspects of assignment related logistics, reporting, and deliverables. Edited financial and legal working papers for the Central Bank of Ukraine. Organized and member of study trips for Ukrainian central bankers to US banking institutions. Team member of Moldova financial sector development needs assessment.

United States Peace Corps, Starachowice and Pila, Poland
VOLUNTEER/TEFL TEACHER (July 1991-July 1993)

EDUCATION

MA, International Relations/International Law and International Economics, Paul H. Nitze School of Advanced International Studies (SAIS), Johns Hopkins University, Bologna, Italy/Washington, DC, 1995. **German Immersion Program**, Middlebury College, 1994. **BA (cum laude), Russian Studies (Departmental Honors)**, The University of the South, Sewanee, Tennessee, 1990. **Semester Study**, Institut fur Europaische Studien, Vienna, Austria, Spring 1989. **Summer Program**, London School of Economics/University of London, London, UK, Summer 1989.

Dual National: US and Ireland

Country work experience: Armenia, Bulgaria, Burkina Faso, Cambodia, Croatia, Czech Republic, Ethiopia, Estonia, Georgia, Ghana, Hungary, Kenya, Kyrgyz Republic, Laos, Latvia, Lithuania, Macedonia, Mali, Moldova, Montenegro, Mozambique, Poland, Romania, Senegal, Slovakia, Slovenia, Uganda, Ukraine, Uzbekistan, Vietnam, Zambia, and Zimbabwe.



TOKI
Application for Appointment

It's important to note that individuals serving on Boards, Committees, or Commissions are required to be residents or property owners of Kiawah Island. Before completing the application, please read the *Volunteer Guidelines* (pg. 3-4) of this form.

Appointment(s) Sought:

Complete this application using the on-line fillable form or print it and fill in manually. Please list the Board(s), Commission(s), or Committee(s) you are applying for:

Arts and Cultural Events Council	

Name: Jack Barnett _____

Kiawah Address: 557 Black Duck Court _____

Current Employment Information: Retired:
Occupation: Flight Attendant Employer: American Airlines _____

Phone: (H) _____ (W) _____ (C) 212-755-2141

Email Address: rjkbarnett@aol.com _____

- Full-time Resident
 Part-time Resident
 Non-Resident

Kindly respond to the inquiries on the next page to provide the Town Council members with more details about your desire to serve. Your presence at the Council meeting is welcome if your application is under review. You will receive advanced notice of the meeting date and time.

Return all completed and **signed** forms in person to Petra Reynolds, Town Clerk at 4475 Betsy Kerrison Parkway, OR email them to her at preynolds@kiawahisland.gov. If you have any questions, please contact her directly at 843-768-5101.

I have read the attached *Volunteer Guidelines* and understand my commitment to them should my application be approved.



TOKI

Application for Appointment | Page 2

Please write legibly. You can add more details if needed. Your input will go to the Town Council for review.

1. What unique experiences or perspectives would you bring to this role?

Please see my attached Bio.

2. If you are chosen, what particular impact do you want to have through your contributions?

I hope to assist the Council in bringing high quality and diverse performing arts and cultural events to Kiawah.

3. Briefly describe your participation in community service or activities.

Locally, I manage communications and marketing for my Church on John's Island. I also volunteer with the Charleston Symphony Orchestra League.

4. Which community topic(s) matter to you and align with the board or committee you want to join?

Arts and Cultural Affairs.

5. Are you presently affiliated or have you previously been involved with a TOKI, KICA, or Charleston County Board or Commission? If yes, which one(s) and during with period?

Yes, I currently serve as a volunteer Poll Manager for the Charleston County Board of Elections and have worked the polls on Kiawah Island for approximately two years.

Signature: _____

Jack Barnett

Date: _____

10-27-25

Unless otherwise provided by law, you serve at the pleasure of Town Council and all appointments are subject to the ethics, government accountability, and campaign reform act, SC Code Ann. Section 8-13-10 Et Seq, and any member appointed to a board or commission whose action is inconsistent or may be perceived to be inconsistent with the spirit or intent of the act may be subject to removal. By signing this document, you acknowledge that you may be subject to a background investigation, including, but not limited to a criminal history, driving record, and credit check.



Personal Statement

The performing arts have always been of passion of mine for as long as I can remember. It is a unique and uplifting experience and reflects the heart and soul of any community.

For the past 20 years I have enjoyed the beauty and serenity of Kiawah including golf, biking and our pristine beaches. I am grateful for the leadership, dedication and hard work of countless individuals both past and present who give their time to make this such a wonderful and special place.

To date, participation in the performing arts has been primarily a seat on the aisle. Now that I am semi-retired and living on Kiawah full time, I hope to find a way to give back to our beautiful Island home. It would be a great honor to serve on the Kiawah Arts Council”

Jack Barnett

Jack is a Business Leader specializing in marketing strategy and brand management as well as a Philanthropic Entrepreneur. He has been a property owner on Kiawah Island for 20+ years, becoming a full resident in 2022.

In 2013 Jack founded and served as President and Chairman of the Board of the Sutton Place Parks Conservancy, a non-profit 501c3 that works to restore, beautify and enhance the city parks in and around the Sutton Place area of New York. Over a three-year period he raised over \$1 million in public and private grants and donations including the New York City Council Parks Equity Initiative, Partnership for Parks, New York Community Trust, Cox Family Charitable Trust and an exclusive sponsorship with TDBank. For his work on the Conservancy he was awarded the Golden Trowel award for best Parks Conservancy by City Parks Foundation and a Citation by the New York City Council for exemplary service to the city.

Jack’s corporate experience includes NBC Television Networks where he was responsible for Global Sales & Marketing at CNBC. A global cable franchise recognized as the world’s leader in business news reaching over 400mm households. His work included developing brand integration strategies and multi-channel marketing concepts for new global clients. He helped develop a multi-million-dollar concept for the first business program dedicated to the options Market called Options Action.

Prior to that he worked for JPMorgan Chase. He served as Vice President for Brand and Acquisition for BrownCo, JPMorgan’s online retail brokerage business for active traders (acquired by ETrade). There he oversaw all media and planning with Ad Campaigns that won the 2004 & 2005 INova award for “Best of Brand”. He championed several key business initiatives to improve lead volume and conversions to sales. From 2000-2004 he defined and built the firm’s interactive marketing department and business initiatives to approximately 25% of total marketing spend and 47% of total acquisition growth.

Jack has worked on and off as a Professional Flight Attendant for American Airlines since 1986, currently

as an International Purser in charge of Passengers and Crew's safety and comfort. In 1992 he was elected by his peers to serve a four-year term as Treasurer of the Association of Professional Flight Attendants, the labor union representing over 28,000 members at American. Reporting directly to the Board of Directors, he prepared and administered a multi-department budget of \$8.2 million and supervised a 350 person payroll and office staff, negotiated two collective bargaining agreements with staff's union, UAW Local 129, directed the Political Action Committee and government lobbying effort and aggressively managed APFA's budget and cash in order to sustain APFA through contract negotiations with a subsequent history making five day strike against American Airlines.

He earned an MBA from Fordham University, Graduate School of Business (1998) completing a summer internship at Lincoln Center for the Performing Arts. A proud graduate of the University of Kentucky (1985) with a BS in Finance. He paid for his undergraduate degree by working for Congressman Harold Rogers, taking a year off in between his studies to work full time in the Congressman's Washington DC Office. Jack achieved the rank of Eagle Scout and received the God and Country Award from the Boy Scouts of America.

Contact details: rjkbarnett@aol.com 212-755-2141



TAB 11

TOWN COUNCIL

Agenda Item

TOWN OF KIAWAH ISLAND

Ad Hoc Civic and Cultural Center Addition Committee

CHARTER

1. The Civic and Cultural Center Addition Committee (CCCAC) for the Town of Kiawah shall be an ad hoc committee of the Town and shall advise and make recommendations to the Town Council on matters relating to the design, planning, and construction of the Civic and Cultural Center addition. The project consists of a new wing addition of approximately 12,000 square feet, including an auditorium, multipurpose community room, foyer/lobby, and supporting facilities, to be constructed within the approved project budget.
2. The Committee shall work in coordination with the Architect of Record, Caplea Coe Architects, Inc. (pursuant to AIA Document B133-2019 executed November 11, 2025), and the Construction Manager at Risk (once selected) throughout all phases of the project.
3. Committee Composition and Structure:
 - a. The Committee shall consist of no more than seven (7) members total: the Mayor, who shall serve as Chair; one (1) additional Town Council member; and up to five (5) community members with relevant experience in construction, engineering, architecture, design, project management, finance, or related fields.
 - b. The Mayor shall appoint each community member with the Town Council's consent and shall designate an additional Council member. Members shall serve at the pleasure of the Mayor and Town Council for the duration of the project.
4. Committee Authority: The CCCAC shall function primarily in an advisory capacity to the Mayor and Town Council. The Committee shall:
 - c. Review and make recommendations on major project decisions, including but not limited to design phase approvals, Construction Manager at Risk selection, change orders, budget modifications, and schedule changes.
 - d. Have approval authority for: Committee meeting minutes, project schedules prepared by the Architect or Construction Manager, and administrative matters related to Committee operations.
 - e. The Committee shall not have authority to enter into contracts, obligate Town funds, or make binding commitments on behalf of the Town. All contractual obligations and expenditures require approval by the Mayor and/or Town Council in accordance with the Town's Procurement Policy.
5. Regular meetings of the Committee shall be held not less than once every month during active project phases, with more frequent meetings (including weekly meetings) during intensive design and review periods as determined by the Chair

of the Committee. The Committee may hold such special meetings as it deems appropriate. Meetings of the Committee shall comply with the South Carolina Freedom of Information Act.

6. In the discharge of its duties, the CCCAC shall:
 - f. Review and provide recommendations on design phase deliverables prepared by the Architect of Record, including:
 - i. Schematic Design Documents (March 2026). The Town Council shall conduct an "over-the-shoulder" review and approval before completion.
 - ii. Design Development Documents, to commence following Owner approval of Schematic Design (End of March – End of May 2026). Town Council shall conduct an "over-the-shoulder" review and approval during this phase.
 - iii. Construction Documents, with bid documents targeted for completion by Fall 2026; and
 - iv. Cost estimates and budget reconciliations at the conclusion of each design phase.
 - g. Review and provide input on the Request for Qualifications (RFQ) for the Construction Manager at Risk (CMAR) before its issuance.
 - h. Participate in the selection process for the Construction Manager at Risk and provide recommendations to the Mayor and Town Council for final approval of the CMAR selection.
 - i. Review and provide input on sustainable design principles and features for the project, including but not limited to energy efficiency measures, renewable energy options (such as solar panels), pervious paving, stormwater management, and landscape sustainability features.
 - j. Review and provide input on major furniture, fixtures, and equipment (FF&E) selections for the facility, working with the Architect of Record to ensure selections align with project budget and functional requirements.
 - k. Monitor adherence to the project schedule and encourage acceleration where feasible, including key milestones: Bid Documents completion (Fall 2026), Construction Commencement (Q1 2027), Substantial Completion (Q2 2028), and Acoustic Tuning/Final Completion (Q3 2028).
 - l. Conduct periodic review of the approved project budget and ongoing project costs to ensure alignment with Council-approved budgets and identify potential cost overruns or savings.
 - m. Receive and review monthly progress reports from the Architect of Record, Project Manager/Owner's Representative, and Construction

Manager at Risk during design and construction phases. The Project Manager shall report directly to the Mayor and the Town Administrator.

- n. Review commissioning reports and participate in the building commissioning process to ensure all systems and equipment are properly installed, tested, and functioning as designed.
 - o. Submit progress reports to the Town Council monthly during design and construction, including:
 - i. Statements on design progress;
 - ii. Construction status;
 - iii. Estimated completion dates;
 - iv. Any significant problems and proposed resolutions;
 - v. Any anticipated cost overruns or savings;
 - vi. Any contemplated modifications to the project scope with supporting reasons;
 - vii. 30-, 60-, and 90-day look-ahead schedules highlighting key activities and decisions anticipated within each period.
 - p. Review all change orders and provide recommendations to approve, approve with conditions, or deny. Each change order shall be evaluated individually. No change order shall be subdivided to avoid the approval requirements of this section. The Committee's recommendations shall be forwarded to the appropriate approval authority as follows:
 - i. Change orders under \$20,000: Committee recommendation to the Mayor for approval;
 - ii. Change orders of \$20,000 or greater but less than \$100,000: Committee recommendation to the Mayor, with reporting to the Ways and Means Committee prior to approval;
 - iii. Change orders of \$100,000 or greater: Committee recommendation to Town Council for approval, following reporting to the Ways and Means Committee.
7. Duration and Sunset: This ad hoc committee shall continue in existence until final project completion, defined as the later of: (1) final acceptance of all construction work and issuance of the final Certificate for Payment by the Architect; (2) completion of all commissioning activities and acoustic tuning; (3) resolution of all outstanding project issues including warranties and closeout documentation; or (4) formal dissolution by Town Council. The Committee shall submit a final report to the Town Council upon project completion, after which the Committee shall be dissolved.



TAB 12

TOWN COUNCIL

Agenda Item

TOWN OF KIAWAH ISLAND AUDIT COMMITTEE CHARTER

1. The Audit Committee (the "Committee") shall assist the Mayor and the Town Council (the "Council") of The Town of Kiawah Island (the "Town") in fulfilling its responsibility to provide oversight of management regarding: (1) the Town's systems of internal controls and risk management; (2) the integrity of the Town's financial statements; (3) the Town's compliance with legal and regulatory requirements and ethical standards; and (4) the engagement, independence and performance of the Town's independent auditors. The formation and activities of the Audit Committee in no way diminish or replace the preceding responsibilities of the Council.
2. **MEMBERSHIP.** The Audit Committee will be chaired by a Town Council member, with the support of the Finance Director. The membership shall comprise at least three (3), but not more than five (5), persons, nominated by the chair and approved by the Mayor and Town Council. Member terms shall be for two (2) years and expire on January 31st of the second year. Committee members may be reappointed for successive terms if nominated and approved by the Mayor and Town Council.

Committee members shall have a proven expertise in finance, accounting, and the review of financial statements. At least one member of the Committee shall have a sophisticated understanding of auditing, financial controls, financial reporting and accounting as determined by the Council.

3. **MEETINGS AND QUORUM.** The Committee shall meet at least quarterly. Meetings may be called by the Chair as circumstances dictate. The Committee shall meet at least twice each year with the independent auditor in separate executive sessions to provide the opportunity for full and frank discussion with or without staff members present.

Notice of meetings shall be given to all Committee members and the public. Meetings of the Committee may be held in person at the Town Hall or by video conference or other communications equipment, through which all persons participating in the meeting can hear and speak to each other. A majority of the members of the Committee shall constitute a quorum. The act of a majority of the Committee members present at a meeting at which a quorum is present shall be the act of the Committee.

4. **AUTHORITY.** The Committee's role is one of oversight. The Mayor, with the support of the Treasurer and Administrator ("management"), is responsible for preparing the Town's financial statements, and the independent auditors are responsible for auditing those financial statements. The Committee recognizes that management, including the finance staff and the independent auditors, has more time, knowledge, and detailed information about the Town than the Committee members. Consequently, in carrying out its oversight responsibilities, the Committee is not providing any expert or special assurance regarding the Town's financial statements or any professional certification regarding the independent auditor's work.

In discharging its role, the Committee is empowered to inquire into any matter it considers appropriate to carry out its responsibilities, with access to all books, communications in any form, records, facilities and personnel of the Town. In addition to retaining the Town's independent auditor, the Committee shall have the power, to retain outside counsel, other auditors or other advisors to assist it in carrying out its activities. The Town shall provide necessary resources to support the Committee's activities. The Committee shall have the authority, with the approval of the Council, to retain, compensate, direct, oversee and terminate the Town's independent auditor and any counsel, other auditors, and other advisors hired to assist the

Committee, who shall be accountable ultimately to the Committee.

The Committee may request any person, including, but not limited to, any officer or employee of the Town or the independent auditor, to attend Committee meetings or to meet with any members of, or advisors to, the Committee.

5. KEY RESPONSIBILITIES

As approved by the Council, the Committee shall undertake the following responsibilities, which are set forth as a guide. The Committee is authorized to carry out these activities and other actions reasonably related to the Committee's purposes or assigned by the Council from time to time.

A. *Independent Audit*

1. Recommend the appointment and review the terms of independent auditor(s) retention, engagement and scope of the annual audit, pre-approve any audit-related and non-audit services (including the fees and terms thereof) to be provided by the independent auditor, and, in connection with any pre-approval of services related to internal control over financial reporting, discuss with the independent auditor the potential effects of such services on the independence of the auditor and hire a separate audit firm for the internal controls audit, if necessary. The committee will evaluate and oversee the work of, the independent auditor(s) who shall report directly to the Committee, and, if appropriate, terminate the independent auditor's engagement;
2. Review and confirm the independence of the independent auditor annually by obtaining and reviewing a report from the independent auditor delineating all relationships between the independent auditor and the Town and discussing with the independent auditor any such disclosed relationships and their impact on the independent auditor's independence, and by obtaining the auditor's assertion of independence in accordance with professional standards;
3. At least every five years, review and recommend to Council the terms of the independent auditor's retention, including a review of fees charged by the auditors for the annual audits;
4. At least annually, review a report from the independent auditor describing the auditing firm's internal quality-control procedures and any material issues raised by the most recent quality-control review of the firm, or by any inquiry or investigation by governmental or professional authorities within the preceding five years, with respect to one or more independent audits carried out by the firm and any steps taken to deal with any such issues;
5. Review with the independent auditor any problems the auditor has encountered performing the audit, any limits to the audit and potential corrective actions, any management letter provided and the Town's response to that letter, and matters that the independent auditor is required to communicate to the Committee; and
6. Review and discuss with Council and senior staff, the independent auditor any significant findings during the year, any restrictions or limits on the scope of activities or access to required information, any changes required in the scope of the audit plan, the audit budget and staffing and, coordination of audit efforts.

B. Internal Control and Risk Oversight

1. Review and discuss with management and the independent auditor the adequacy of the Town's internal controls and the Town's major financial risks or any significant exposures and assess the steps management has taken to minimize such exposures. If the auditor does not possess the skillset to audit the Town's financial controls, at the discretion of the Audit Committee, a second audit firm may be retained to focus on an audit of internal controls;
2. Review and discuss with management and the independent auditor the Town's policies with respect to risk assessment and risk management, including the Town Reserves' investment and compliance risk;
3. Oversee compliance with and review the effectiveness of the Town's internal control systems, including through regular executive sessions, whether internal control recommendations identified by internal and independent auditors have been implemented by management; and
4. Establish and oversee procedures for the receipt, retention and treatment of complaints regarding accounting, internal controls, or auditing matters and the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters.

C. Financial Reporting

1. Review and discuss with management and the independent auditor all critical accounting policies and practices used by the Town and any significant changes in the Town's accounting policies;
2. Review with the independent auditor significant accounting and reporting issues, including recent professional and regulatory pronouncements, understand their impact on the financial statements, and ensure that all such issues have been considered in the preparation of the financial statements;
3. Review issues related to judgments made involving valuation of assets and liabilities, and commitments and contingencies;
4. Review with management the annual financial statements, the annual audit report and recommendations of the independent auditor, including any audit problems or difficulties, and management's response;
5. Review with management and the independent auditor any complex and/or unusual transactions or other significant matters or events not in the ordinary course of business; and
6. Annually review with management and the external tax advisor any issues or judgmental areas relating to the Town's tax compliance.

D. Oversight of Legal and Ethical Compliance

1. Review periodically with the Town's legal counsel the scope and effectiveness of the Town's legal and regulatory compliance policies and programs, and ethical standards and policies;
2. Oversee legal and regulatory compliance and compliance with ethical standards and policies, including the Conflict of Interest Policy, and forward reports of non-compliance to Council;
3. Review and discuss with management and the auditors any possible areas of noncompliance with laws or policies and ensure that management follows up with relevant procedures where appropriate;
4. Ensure through inquiry and other appropriate means that management is communicating to the Town's staff the importance of the Town's values, code of conduct and ethics, and internal controls; and
5. Review, discuss with management and the independent auditor, and recommend a course of action to Council regarding any transactions or courses of dealing with related persons (e.g., including elected officials, executive officers, their immediate family members) that are significant in size or involve terms or other aspects that would likely be negotiated with independent parties, involving any safeguards or additional procedures to be applied in such circumstances.

E. Other Responsibilities

Maintain minutes of meetings and periodically report Committee findings, recommendations and actions to the Council, including on any issues that arise with respect to the quality or integrity of the Town's financial statements, the performance and independence of the independent auditors and the performance of the internal audit function, the Town's compliance with legal or regulatory requirements and its ethical standards and policies, and any other matters the Committee deems appropriate for the Council.

Revised 01/06/2026



TAB 13

TOWN COUNCIL

Agenda Item

Town of Kiawah Island

Public Safety Committee Charter

1. The mission of the Public Safety Committee is to assist the Town in meeting its state-mandated responsibilities to its citizens with regard to providing for the health, safety, and welfare of its citizens, as set forth in Title 5 of the State of South Carolina Code of Laws, and to initiate and consider proposals and methods to upgrade and improve public safety on the Island.
2. The Committee shall be chaired by a member of the Town Council, with the support of the Public Safety Director. It shall comprise at least four (4), but not more than seven (7) members, which include at least one representative from KICA, KIGR, Edens, SJFD, and Kiawah Island residents approved by the Mayor and the Town Council. Members' terms shall be one year and expire annually on January 31. The Mayor and the Town Council may reappoint committee members for successive terms.
3. Committee functions include:
 - Coordinate the Town's public safety and security activities with all other island security services.
 - Serve as liaison with the St. Johns Fire District, Charleston County Emergency Medical Services, and the Charleston County Sheriff's Office, Supervisor of the Town's contracted CCSO deputies.
 - Monitor the performance and activities of the Town's contract beach patrol service.
 - Monitor the Code Enforcement activities of the Town for all areas within its jurisdiction.
 - Devise a long-term island security plan.
 - Ensure that appropriate plans are in force to accommodate evacuation, emergency law enforcement, and any other services required to ensure the personal safety of all citizens, property owners, and visitors to Kiawah Island.
 - At the will and direction of the Town Council, engage in any activities, investigations, analyses, etc., relating to public welfare and safety.
 - Make recommendations to the Town Council on ways to improve the quality of public safety on the Island.
4. The Committee will be responsible to the Town Council and has no authority to spend funds or supervise staff except as approved by the Town Council. Annually, the Committee will prepare a budget request covering committee activities for submittal to the Town Council for approval and inclusion in the overall budget, if applicable.



TAB 14

TOWN COUNCIL

Agenda Item

TOWN OF KIAWAH ISLAND
DESIGN REVIEW BOARD CHARTER

1. The Kiawah Island Design Review Board (DRB) shall provide design review to enhance the island's character, preserve property values and protect the unique identity of the Town of Kiawah Island. The Design review process is intended to promote architectural design that is compatible in mass, scale, site orientation and design with existing development of the Town and in harmony with the natural environment.
2. The Design Review Board shall consist of five members, at least three of whom must be property owners or resident members, all to be appointed by the Mayor and approved by the Town Council. At least three members shall be registered design professionals or have relevant professional credentials and expertise in the areas of architecture, landscape architecture, urban planning, construction or similar field. The terms "resident member" means a person who resides permanently within the Town of Kiawah Island for not less than eight months each calendar year.

The term of office for members shall be three years from the date of appointment. Members are eligible for reappointment, however no member shall serve more than three consecutive terms of office; provided, however, that such member shall be eligible to hold office after a break in service of 12 months.

3. Design Review Board functions and powers:
 - a. The DRB shall have jurisdiction over all lands within the municipal limits of the Town of Kiawah Island.
 - b. The DRB shall establish a process for sequenced reviews that will protect and improve the visual and aesthetic character of development within the Town of Kiawah Island.
 - i. Review, and approve, approve subject to conditions or deny approval for: construction, enlargement or improvements that relates to design, mass, siting or exterior appearance of a structure, except for those actions deemed to be routine maintenance by the Planning director.
 - ii. Review, and approve, approve subject to conditions or deny approval for a proposed Tree Preservation Plan, removal of an Specimen or Grand Tree of applications of special circumstances regarding tree removal pursuant to section 12-129 Tree Preservation and Landscape Standards.
 - c. The DRB shall review and render decisions using standards and guideline as referenced within the "Town of Kiawah Island Design Review Standards and Guidelines" on projects within the municipal limits of the Town of Kiawah Island, excluding single-family residential, except single family residential which are not subject to review or purview of any established architectural review board.

4. Decisions of the Design Review Board:
 - a. The DRB may grant relief from the establish standards and guidelines, where exceptional circumstances exist and where the DRB determine that the applicant demonstrates the relief does not adversely affect the character of the properties within the vicinity nor interfere with the purposes of the DRB.
 - b. The DRB shall render decisions on variance applications submitted pursuant to section 12-129.Tree Preservation and Landscape Standards. The DRB may grant a variance only if exceptional circumstances exist, where practical difficulty or unnecessary hardship is so substantial, serious and compelling that relaxation of the general restrictions ought to be granted. No approval of such application shall be granted unless the applicant shall show the following;
 - i. There are extraordinary and exceptional conditions pertaining to the particular piece of property;
 - ii. These conditions do not generally apply to other property in the vicinity;
 - iii. Because of these conditions, the application of the ordinance to the particular piece of property would effectively prohibit or unreasonably restrict the utilization of the property;
 - iv. The authorization of a variance will not be of substantial detriment to adjacent property or to the public good, and the character of the zoning district will not be harmed by granting of the variance.



TAB 15

TOWN COUNCIL

Agenda Item

TOWN OF KIAWAH ISLAND
RESOLUTION 2026-01

**A RESOLUTION TO AMEND THE TOWN OF KIAWAH ISLAND
PLANNING DEPARTMENT FEE SCHEDULE.**

WHEREAS, the Town of Kiawah Island Municipal Code currently contains *Chapter 12 - Land Use Planning and Zoning*; and

WHEREAS, Section 12-30 of the Land Use Planning and Zoning Ordinance states that fees will be levied to defray expenditures associated with application processing. The fees are due with the application submission. Fees shall be determined by the Town Council; and

WHEREAS, the Town of Kiawah Island now finds that, upon further review of application processing in conjunction with the establishment of the Design Review Board and elimination of the Landscape and Tree Preservation Board, it is in the public interest to amend the *Town of Kiawah Island Planning Fee Schedule*.

NOW, THEREFORE, BE IT ORDERED AND ORDAINED BY THE COUNCIL OF THE TOWN OF KIAWAH ISLAND, SOUTH CAROLINA, AND IT IS ORDAINED BY THE AUTHORITY OF SAID COUNCIL.

Section 1 **Resolution**

The Town Council for the Town of Kiawah Island hereby resolves to amend its Planning Department Fee Schedule “**Exhibit A**” incorporated fully herein by reference.

Section 2 **Severability**

If any part of this ordinance is held to be unconstitutional, it shall be construed to have been the legislative intent to pass said ordinance without such unconstitutional provision, and the remainder of said ordinance shall be deemed to be valid as if such portion had not been included. If said Ordinance, or any provisions thereof, is held to be inapplicable to any person, group of persons, property, kind of property, circumstances or set of circumstances, such holding shall not affect the circumstances or set of circumstances, such holding shall not affect the applicability thereof to any other persons, property, or circumstances.

Section 3 **Effective Date and Duration**

This resolution shall become effective on the date of its passage, provided that the Town Council has appointed members to the Design Review Board pursuant to the Design Review Board Charter and has adopted rules of organizational procedure.

PASSED, APPROVED, AND ADOPTED BY THE COUNCIL FOR THE TOWN OF KIAWAH ISLAND ON THIS 6th DAY OF JANUARY 2026.

Bradley D. Belt, Mayor

Petra S. Reynolds, Town Clerk

MAYOR:
Bradley D. Belt

TOWN ADMINISTRATOR:
Stephanie Tillerson

MAYOR PRO TEMPORE:
Russel A. Berner



TOWN ATTORNEY:
Stafford J. McQuillin III

COUNCIL MEMBERS:
E. Luke Farrell
Madeleine Kaye
Lance Spencer

MEMORANDUM

TO: Town of Kiawah Island

FROM: John Taylor, Jr., Planning Director

DATE: January 6, 2026

SUBJECT: Planning Department Fee Schedule Change

Town Council approved the establishment of Design Review Standards and a Town of Kiawah Island Design Review Board on December 2, 2025. Upon constitution of the Design Review Board Charter, the proposed changes to the Planning Fee Schedule provide the administrative processing of applications for design review pursuant to adopted standards.

Fees are comparable to other community types. However, in order to streamline processing of applications, opposed to a separate fee for each individual review required with separate submittals, the proposed fee schedule incorporates a one-time fee payment structure for the sequence of reviews required or development projects. Citizenserve the Town's online permitting system will track each review stage depending on the review type (i.e. preliminary or final).

The proposed changes to the Planning Fee Schedule also reflect the recommendation to eliminate the Landscape and Tree Preservation Board and have the established Design Review Board administer those functions.

The Kiawah Island Architectural Review Board current fees are incorporated as a reference only.

Please see the attached draft fee schedule.

DRAFT



Town of Kiawah Island Planning Department Fee Schedule

Amended: January 6, 2026

Effective: January 6, 2026

<u>Service</u>	<u>Fee</u>
A. ORDINANCES AND PLANS	
1. Town of Kiawah Island Land Use Planning and Zoning Code Ordinance	\$50.00
2. Town of Kiawah Island Comprehensive Plan	\$90.00
3. Ordinance, Plans & documents in digital form	\$10.00
B. COPIES	
1. Black & White Copies 8.5 x 11 (Single-sided pages)	\$0.15
2. Black & White Copies 8.5 x 11 (Double-sided pages)	\$0.25
3. Black & White Copies 11 x17	\$0.75
4. Color Copies 8.5 x11 (Single-sided pages)	\$0.75
5. Color Copies 8.5 x11 (Double-sided pages)	\$1.25
6. Color Copies 11x17	\$2.00
C. MAPS	
1. Entire Town Zoning or Future Land Use data maps 11x17	\$5.00
2. Entire Town Zoning or Future Land Use data maps 24x36	\$20.00
3. Specific Area Town Zoning or Future Land Use data maps 11x17	\$5.00
4. Specific Area Town Zoning or Future Land Use data maps 24x36	\$20.00
5. Special Requests (Customized maps); Example, parcel boundaries with CAMA Data or other associated data, study areas, municipal boundaries, etc.	\$60.00 per hour
D. RECORDINGS	
1. Copies of Tape/Digital Recordings	\$35.00
E. SUBDIVISION PLATS	
1. One Lot or Exempt Plat	\$50.00
2. 2-10 Lots or Minor Subdivision Plat	\$100.00 + \$10/lot
3. 11 or more Lots or Preliminary Plat for Major Subdivision	\$200.00 + \$10/lot
4. Conditional Plat	\$200.00 + \$10/lot
5. Final Plat	\$100.00 + \$10/lot
6. Public Improvement(s) Review (Engineering)	\$100.00 + \$10/lot
7. Appeals of Subdivision Related Administrative Decisions	\$300.00
F. ZONING	
1. Zoning Verification	\$25.00
G. ZONING PERMITS	
1. Temporary Zoning Permit Fee	\$50.00
2. Protected/Grand Tree Removal Permit (Zoning Permit)	\$75.00

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<u>Service</u>	<u>Fee</u>
3. Residential Land Disturbance	\$25.00
4. Residential Zoning Permit	\$25.00
5. Home Occupation	\$75.00
6. Commercial and Industrial Zoning Permits:	
a. Up to 5,000 SF and greater building size	\$75.00
b. 5,000 SF and greater building size	\$100.00
H. ZONING AND COMPREHENSIVE PLAN AMENDMENTS	
1. Zoning Map Amendments [Rezoning] including Form-Based Zoning District Applications	\$325.00 + \$10/acre
2. Planned Development (PD) Zoning District Applications	
a. Less than 10 acres	\$350.00 + \$10/acre
b. 10-99 acres	\$1,200.00 + \$15/acre
c. 100 acres or greater	\$1,800.00 + \$20/acre
3. Amendment to existing Planned Development text	\$400.00 + \$2/acre
4. Sketch Plan Amendment	\$350.00 + \$2/acre
5. Zoning and Land Development Regulations Ordinance Text Amendments	\$350.00
6. Comprehensive Plan Amendments	\$350.00
I. DEVELOPMENT AGREEMENT APPLICATIONS	
1. Development Agreement Application Fees	<ul style="list-style-type: none"> • \$900 + \$10/acre; and • Applicants may be required by Council to provide funds to the Town to hire third party consultants and/or experts necessary to assist the Town in reviewing and evaluating the application.
J. SITE PLAN REVIEW	
1. Limited Site Plan Review	\$150.00
2. Up to 5,000 SF building size or up to 10 acres if no buildings are included in the application	\$300.00
3. Greater than 5,000 SF building size or 10 acres or more if no buildings are included in the application	\$600.00
K. BOARD OF ZONING APPEALS	
1. Appeals of Zoning Related Administrative Decisions	\$350.00
2. Special Exceptions	\$350.00
3. Zoning Variances	\$350.00
L. DESIGN REVIEW BOARD	
1. Single Family Residential – (Minor / Landscape)	\$150.00
2. Single Family Residential – (New Construction / Major) <i>Includes Conceptual and Final Review</i>	\$300.00
3. Multifamily Residential / Commercial / Mixed Use – (Minor / Landscape)	\$500.00
4. Multifamily Residential – (New Construction / Major) Up to <i>Includes Conceptual, Preliminary and Final Review</i>	\$1,000.00
5. Commercial / Mixed Use	\$1,500.00

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<u>Service</u>	<u>Fee</u>
<i>Includes Conceptual, Preliminary and Final Review</i>	
6. Appeals of Administrative Decisions	\$350.00
L. LANDSCAPE AND TREE PRESERVATION BOARD	
1. Variance	\$350.00
2. Appeals	\$350.00
M. ADDRESSING	
1. Street Name Change	\$50.00
N. SIGNS	
1. Wall Signs (per use)	\$50.00
2. Free Standing Sign	\$50.00
O. FEE SCHEDULE NOTES	
1. Zoning and Planning Department fees that are based on acreage include highland acreage and freshwater wetland acreage; OCRM Critical Line acreage is excluded from fee calculations.	
2. Town Council may waive all or a portion of the above fees upon submittal of a request to Council and subsequent approval at a public meeting of Town Council.	
3. If any type of zoning application/permit is required in order to bring properties that have current zoning violations into compliance with the Town of Kiawah Island Land Use Planning and Zoning Ordinance, the zoning application/permit fees shall be doubled.	
4. Separate applications and fees shall be filed for more than one Variance request to each requirement of this Ordinance.	
5. Fees for 911 street signs may be waived.	
6. Fees associated with the Freedom of Information Act adhere to the Town's outlined FOIA Policy.	

Planning Fee Schedule Comparison

Link to Fee Schedules	Kiawah Proposed	Hilton Head	Mt. Pleasant (Commercial only)	Beaufort County	City of Charleston	Sullivan's Island
Design Review Board						
Single Family Residential - new/ major (conceptual & final reviews)	\$300	\$350 (\$175 per meeting)	NA	NA	Based on cost of improvements	\$ 1280 (Max. 3 meetings)
Single Family Residential minor	\$150	\$100	NA	NA	same	\$426.60
Multi Family Residential - new/major (conceptual, preliminary & final reviews)	\$1,000	same	NA	\$1000 + .02/per gross sf of building(s)	same	same
Multi Family Residential - minor	\$500	same	NA	\$250	same	same
Commercial/Mix Use	\$1,500	same	\$2000 (\$1000 per meeting)	same	same	same

Scenario 1 New Single Family 3000 SF TOKI DRB \$300
 Zoning Permit \$25

Scenario 2 Commercial 20,000 SF TOKI Site Plan Review \$500
 TOKI DRB \$1,500
 Zoning Permit \$100

Kiawah Island ARB Fees

Single Family Residence

- New Construction: \$60.00 per 100 square feet (heated, covered and screened) or a \$3,000.00 minimum.
- New Construction of Model Homes: \$1,000.00 for each new home after initial design approval.
- Major Improvement: \$60.00 per 100 square feet (heated, covered and screened) or a \$3,000.00 minimum.
- Minor Improvement: \$300.00 – \$500.00, at discretion of the ARB.
- Maintenance Requiring Review: \$200.00
- Maintenance Repair: \$100.00

Commercial and Recreational

- New Construction: Contact ARB
- Major Improvement: \$60.00 per 100 square feet (heated, covered, and screened) or \$2,000 minimum, whichever is greater.
- Minor Improvement: \$300.00 – \$500.00, at discretion of the ARB.
- Maintenance Requiring Review: \$200.00
- Maintenance Repair: \$100.00

Multi-Family Housing

- New Construction: \$60.00 per 100 square feet (heated, covered, and screened) or \$10,000 minimum, whichever is greater.
- Major Improvement (Single Unit): \$60.00 per 100 square feet (heated, covered, and screened) or \$500 minimum, whichever is greater.
- Major Improvement (Multiple Units): \$60.00 per 100 square feet (heated, covered, and screened) or \$1,000 minimum, whichever is greater.
- Minor Improvement: \$300.00 – \$500.00, at discretion of the ARB.
- Maintenance Requiring Review: \$200.00
- Maintenance Repair: \$100.00

Signage

- \$100.00 per application, plus \$10.00 per sign after first sign on application.

Construction or Design Change

- \$200.00 per Application. The first Construction or Design Change Fee is waived.

Re-inspection

- New Construction: \$300.00 following second failed inspection.
- Major Improvement: \$300.00 following second failed inspection.
- Minor Improvement: \$100.00 following second failed inspection.