



Advocating responsible decisions to sustain the quality of life in coastal Georgia.

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January 11, 2016

Meredith A. Allen
Corps of Engineers
100 W. Oglethorpe Avenue
Savannah, Georgia 31401

Dear Ms. Allen, Meredith.A.Allen@usace.army.mil

We appreciate the opportunity to comment on Sea Island Acquisition's application for a permit to build a new groin on the south end of Sea Island. On behalf of the Center for a Sustainable Coast, including our board, advisors, and members, I am writing to urge the U.S. Army Corps of Engineers to deny this request for a permit, based on the following rationale.

The Corps has adopted advisory guidelines discouraging the use of groins, and we cite Corps general findings in relation to our objections to the current proposal being made by Sea Island Acquisition (SIA). Consistent with existing Corps guidance, we are advised by consulting geologists that the project proposed will worsen shoreline erosion problems on the downdrift (south) side of the groin for which a permit is being requested. In doing so, the groin would rob the sand-sharing system by holding back sand on the updrift (north) side of the groin.

Disruption in the sand-sharing system will adversely affect habitat in the conservation area south of the groin, which has already been rapidly eroding in recent years. According to our records, based on tax-mapping from Glynn County, since the mid-1970s about half of the elongated tax parcel on the south end of the Sea Island Spit has been submerged due to erosion, and some 100 acres now lie below the ocean (see attached map). It appears that the rate of erosion has been accelerating, likely to be at least in part a result of the existing Sea Island groin to the north of the project area, not far from the project site.

Exacerbating the loss of sand along this already diminishing peninsula will harm nesting areas and habitat for sea birds and turtles. Moreover, such disruption could reduce natural deposits that serve to stabilize and renourish the beachfront along East Beach, where existing oceanfront residences are at risk from storm surge and other natural causes of erosion.

Another aspect to this proposal that deserves your attention is the applicant's claim that adding 120,000 cubic yards of sand to the beach on the project site makes the project a 'hybrid' by combining a conventional groin with a renourishment effort, thus negating adverse effects. However, the volume of material being proposed is a fraction of what would be retained and held back by the groin as described in the permit application. Accordingly, the proposal is either ill-designed or misleadingly portrayed, and in either case would produce adverse disruption in the



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natural movement and deposition of sand in the vicinity of the project, which will cause impacts that conflict with the public interest.

Such impacts are significant, harmful, and unreasonable. We have reached this conclusion based not only on our own observations and experience, but also on the advice of highly qualified experts, including coastal geologists and wildlife resource biologists.

We fully agree with the Corps' current advice that groins cause undesired erosion and sand-movement disruptions along coastal areas.

We urge you to deny this permit request and reject the application in support of a consistent, well-justified regulatory position that discourages the use of such structures along Georgia's coast.

Please carefully consider my above rationale and respond with any questions or other relevant follow-up.

Thank you.

David C. Kyler, Executive Director
Center for a Sustainable Coast

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