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May 15, 2018

Attention: Sarah E. Wise  
Corps of Engineers  
100 W. Oglethorpe Avenue  
Savannah, Georgia 31401  
[sarah.e.wise@usace.army.mil](mailto:sarah.e.wise@usace.army.mil)

912-652-5550

Re permit: SAS-2015-00742 (SP-SEW)

<http://www.sas.usace.army.mil/Portals/61/docs/Regulatory/publicnotices/20180320-SAS-2015-00742-Glynn-0419-SEW.pdf?ver=2018-03-20-111011-967>

Dear Ms. Wise, (912)

On behalf of the Center for a Sustainable Coast I am submitting comments on Sea Island Acquisition's revised application for a permit to build a new groin on the south end of Sea Island, now including extensive deposition of sand (up to 2.5 million cubic yards, dredged from offshore areas) along some three miles of ocean shoreline. Below I reiterate and expand upon our objections to the original permit.

We urge the U.S. Army Corps of Engineers to deny this request for a revised permit, based on the rationale explained below. In addition to our reasoning presented in original objections filed in Center comments submitted on January 11, 2016, our case is now strengthened by the stark evidence of hurricane damage in the interim – Hurricane Matthew in 2016 and Hurricane Irma in 2017.

Again we note that 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 the applicant, Sea Island Acquisition, LLC. 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 had already been rapidly eroding in the years prior to the two hurricanes in 2016 and 2017. At the time of our prior objections (January 2016), 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 had been submerged due to erosion, and some 100 acres then lay below sea-level. Even then, nearly 30 months ago, it appeared that the rate of erosion on the spit was accelerating, likely at least in part due to the existing Sea Island (southernmost) groin, located to the north of the Reserve project area.

Building a third groin, as proposed again in the revised permit application now under review, will exacerbate the loss of sand along this already diminishing strand known as the Sea Island Spit, harming 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.

All these well-justified objections are now compounded by the devastating impacts of the two referenced hurricanes, which clearly demonstrate the dire vulnerability of the fragile strand of ill-suited land on which the eight-lot Reserve project is proposed to be built.

By enabling a large volume of dredged material taken from offshore to be deposited south of the existing southern groin, the proposed permit would create a false and deceptive impression – especially to an uninformed observer – that the southern end (known as the ‘Spit’) is far less prone to storm damage than it obviously is. Extensive damage to this project area incurred due to hurricanes over the past two years are likely to be repeated or worsened by future storms as sea-level continues to rise. If the eight-lot Reserve project along that 1200 feet of shoreline had been developed when Matthew and/or Irma winds and storm-surge assaulted this area, damage to private property would have been in the many millions of dollars. Moreover, debris created by storm damage at Sea Island Reserve, if developed, may have worsened hazards to surrounding areas, including private homes on the north end of Saint Simons Island.

Therefore, to the extent that the revised permit application, now under review, is justified on the basis of repairing damage to the southernmost end of Sea Island, in the area of the “spit” where the Reserve project is proposed, we strongly advise against approving it. Deposition of dredge material to “renourish” this area would severely subvert the public interest by enabling and encouraging irresponsible oceanfront development in a demonstrably high-risk area.

The permit requested would invite unwise private investment, which would – unquestionably – put both property and lives at significant risk. In spite of this area being ineligible for federally subsidized insurance due to its long-recognized high risk, development appears likely if erosion damage is repaired. In the likely event of added storm damage resulting from development of the Reserve project if the southernmost 1200 feet of shoreline is re-nourished, unjustified public expenses would be incurred in response to escalated public-safety hazards.

As previously noted, the volume of material proposed for deposition in the Reserve area is a fraction of what would be retained and held back by the groin as described in the permit application. Accordingly – again as we previously asserted – the proposal is either ill-designed or misleadingly portrayed, and in either case would adversely disrupt the natural movement and deposition of sand in the vicinity of the project. This disruption in the sand-sharing system will cause impacts that conflict with the public interest, and such disruptions would be magnified by hazards induced by the high-risk Reserve project.

Reasonably anticipated impacts from shoreline reconstruction in this area are significant, harmful, and unreasonable. This conclusion is 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.

Unless the Corps denies approval of depositions south of the existing southern groin, we adamantly oppose the application. If depositions are prohibited along the southernmost 1200 feet as proposed, upland development and considerable public hazards would be averted. Furthermore, consistent with this rationale, there is no justification for the third groin proposed in the current, revised permit application.

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

Respectfully,



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