

Rader Response

We thank Ms. Rader for voicing her concerns related to our project application. We hope we can address them.

1. **Proximity of the Hogg Hummock Historic District.** A cultural/historical review is required via the Nationwide Permit 27 that was authorized by the US Army Corps of Engineers (USACE). The USACE archaeologist looks at every NWP27 and individual permit with respect to section 106 and SHPO. They look at all impacts and develop permit area typically with a 100-m buffer by regulation. It was deemed there was no substantial concern or impact on historical or cultural resources. All proposed sites will be vetted with the community through our Community Planning Advisory Board and two paid community liaisons prior to installation.

One Hundred Miles (Alice Keyes) Response

We thank OHM and Ms. Keyes for a detailed response to our permit application. We see two fundamental concerns we would like to address

1. **Proximity of the Hogg Hummock Historic District.** A cultural/historical review is required via the Nationwide Permit 27 that was authorized by the US Army Corps of Engineers (USACE). The USACE archaeologist looks at every NWP27 and individual permit with respect to section 106 and SHPO. They look at all impacts and develop permit area typically with a 100-m buffer by regulation. It was deemed there was no substantial concern or impact on historical or cultural resources. All proposed sites will be vetted with the community through our Community Planning Advisory Board and two paid community liaisons prior to installation.
2. **Water Quality Monitoring.** We agree that it would be beneficial to Sapelo to have water quality monitoring to protect people. However, such a requirement is fully outside of the obligations of a CMPA permit or authority. The areas designated in our application are permanently closed to harvest and thus do not require water quality monitoring.

Watts Response

We thank Mr. Watts for his comments related to our permit application. We see 7 concerns that we would like to address. We hope that our responses help alleviate the concerns raised.

1. **Applicant Clarity.** We apologize that the applicant's identity was not clear. We simply filed the required forms as required for the permit application.
2. **Community Engagement.** Over the past year, we have been working with the community to help with understanding the project. We have had members of our project team go door-to-door discussing concerns, distributing flyers with our contact information. We also established a Community Planning Advisory Board including primarily descendants who reside on Sapelo and who have as extensive a cultural knowledge of the areas we have proposed to work in as anybody. The Board has met 3 times over the past year to provide input and recently held a public outreach event on February 14, 2026, to explain the project to the community and address any concerns. All their contact information has been made readily available since 7/15/2025, and we have been responsive to all concerns that have been raised through the Board. Moving forward, we will continue with regular newsletters and will make all proposed sites available for comment before any installation. We are leveraging the extensive community outreach we have carried out to hire 5 descendants to be central to planting the oyster shells in the marsh.
3. **Site Locations.** The sites as designated on the map are simply 'proposed' locations that are being discussed with the community before any are installed. The plan is to do installations in groups of 10 with detailed maps provided to GA DNR and community members for feedback.
4. **Proximity of the Hogg Hummock Historic District.** A cultural/historical review is required via the Nationwide Permit 27 that was authorized by the US Army Corps of Engineers (USACE). The USACE archaeologist looks at every NWP27 and individual permit with respect to section 106 and SHPO. They look at all impacts and develop permit area typically with a 100-m buffer by regulation. It was deemed there was no substantial concern or impact on historical or cultural resources. All proposed sites will be vetted with the community through our Community Planning Advisory Board and two paid community liaisons prior to installation.
5. **Adjacent Landowners.** There are no adjacent landowners other than the state of Georgia identified because all sites will be adjacent only to state owned lands. The definition of adjacent in this context and based on our conversations with GA-DNR, is the area between mean high and mean low water that is physically connected to the property line out to mean low water. All our sites will be on the opposite bank and

therefore the only adjacent landowner is the State of Georgia. With this consideration, we intend to work with landowners if a proposed site is nearby to get feedback and will adjust sites to provide the best possible outcome of the project.

6. **Water Quality Monitoring.** We agree that it would be beneficial to Sapelo to have water quality monitoring to protect people. However, such a requirement is fully outside of the obligations of a CMPA permit or authority. The areas designated in our application are permanently closed to harvest and thus do not require water quality monitoring.
7. **Permitting Procedure.** We have followed all procedures and policies outlined in this permit application. We have been coordinating with GA-DNR since the project was awarded. Any procedural 'errors' related to our permit are not relevant to this permit consideration.
8. **Request for Information.** The claim that the commenter makes with regards to \$15,000 to obtain information related to this project is not entirely accurate. This request was the result of an open records request of which we received 2. We provided all proposal documentation including budgets and made these publicly available at no cost. The \$15,000 charge was to cover costs associated with compiling requested emails. The original request was for:

- 1) *Any and all documents and records relating to the Project, including:*
 - a. *any Project budgets;*
 - b. *any plans for engagement and/or involvement of the Hogg Hummock community; and*
 - c. *any analyses regarding access to or impact upon community waterways, drainage ditches and/or land.*
- 2) *Any and all correspondence, contracts, letters of intent, memoranda, grant proposals or other documents with NOAA or other federal, state or local agencies regarding the provision of funding for the Project.*
- 3) *Any and all correspondence, contracts, letters of intent, memoranda or other documents with SOLO regarding the Project.*
- 4) *Any and all correspondence, contracts, letters of intent, memoranda or other documents with S2S regarding the Project.*

As part of this request, we provided everything we had for item 1 at the time and made these available to the public as well as all documents except for correspondence in items 2-4. At this time, we also offered to meet and discuss the project with the parties at any time. Over the past year and a half, no one has reached out in this capacity to discuss the project with us other than through the Open Records Request.

For the correspondence component in items 2-4, the University of Georgia Open Records Office requested specific details with respect to words to search in emails.

The words provided for the email search included search terms which generated over 50,000 emails. The cost to sort through these was then estimated at \$15,000. This is a standard Open Records Request procedure.

With respect to the permit application, no decisions have been made at this time as to specific locations within either marsh system. Specific sites will be located through a collaborative process between community input and scientific data and modeling, and will be submitted to GA-DNR prior to any installation.

Desmond Response

We thank Mr. Desmond for his comments and hope we can address these to the satisfaction of all involved.

1. **Applicant Clarity.** We apologize that the applicant's identity was not clear. We simply filed the required forms as required for the permit application. We have provided detailed flyers to all residents with contact information for all parties involved and are available to discuss all aspects of the project.
2. **Adjacent Landowners.** There are no adjacent landowners other than the state of Georgia identified because all sites will be adjacent only to state owned lands. The definition of adjacent in this context and based on our conversations with GA-DNR, is the area between mean high and mean low water that is physically connected to the property line out to mean low water. All our sites will be on the opposite bank and therefore the only adjacent landowner is the State of Georgia. With this consideration, we intend to work with landowners if a proposed site is nearby to get feedback and will adjust sites accordingly to provide the best possible outcome of the project.
3. **History of Oyster Harvesting.** There was no provision in the permit application that required a historic analysis of harvest. We have come to understand that oyster reefs were much more prevalent in these areas in the past through conversations and coordination with the community and GA-DNR.
4. **Project Location.** The sites near Hogg Hummock were chosen because they are culturally and historically important based on community feedback. Oyster restoration is well established and improves water quality, enhances fishing, and provides flood risk reduction, all of which benefit the community.
5. **Environmental Impact Statement.** This project will be evaluated and requires a NEPA permit which is being prepared and obtained by NOAA.

Hodges Response

We thank Mr. Hodges for his comments and hope we can address these to the satisfaction of all involved.

1. **Site locations.** We will provide RTK-GPS locations, LiDAR derived elevations, and photos of all installed sites to GA-DNR CRD. According to the permit, we will submit proposed locations (including the data listed above) for a LOP prior to each installation.
2. **Maps.** The layout map shows potential sites. Exact sites will be determined using a hydrodynamic model along with community input. All sites will be documented (RTK-GPS, LiDAR, photos) and submitted to GA-DNR for review prior to installation. The Letter of Permission for each site group will include a more detailed map.
3. **Public Involvement.** Public involvement in this project has been ongoing with our Community Planning Advisory Board and our community outreach team. Any member of the public is welcome to discuss the project with our team at any time. A member of our team has met with community members every time a community member has requested a meeting with the first individual meeting having been held on February 13, 2025. The next stage of the project commenced with our first Community Outreach Event held on February 14, 2026, where all community members were invited to come and hear about plans moving forward and offer feedback, thoughts and opinions, and opportunities to contribute.
4. **Material Removal.** As per the permit application, “In the event non-shell cultch material is determined to be unsuccessful at a given site will be removed. Unsuccessful will be defined as (a) material not exhibiting recruitment of oyster spat and/or barnacles within 24 months of deployment (b) material (e.g. oak bundles) becomes unstable.” We think removal within 180 days is entirely reasonable after the initial 24-month period.
5. **Final Report.** A final report is required by the funding agency (NOAA). This report will include all work completed, site surveys, demonstration of removal of extraneous materials, and other information. We will make this report available to GA-DNR as well as the public. We will also report on progress periodically through additional community outreach events and flyers for the duration of the project and most likely afterwards.