

From: [Andy Desmond](#)
To: [Tobler, Paul](#)
Subject: Comments on Hogg Hummock Big Hole Permitting Application
Date: Saturday, February 14, 2026 12:13:59 PM

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Mr. Paul Tobler
Georgia DNR

Sir,

These are my comments on the linked proposal documents for disturbance of Coastal Georgia Marshland, as follows: <https://coastalgadnr.org/university-georgia-oyster-reef-restoration-and-enhancement-cabretta-and-big-hole-creek-sapelo>

I wish to state, preliminarily, that I do not oppose this project in its entirety. I do have issues with preparations for the project, inadequate disclosures, questionable siting of the project, and matters involving adjoining marshfront developed property owners.

1. The applicants are not clearly identified in the documentation that is linked on your web page, above. The public has a right to know precisely who is proposing the marsh disturbance and the public deserves to know whether any potential conflicts of interest exist among the project applicants and adjoining landowners who stand to reap future benefits from having readily accessible mature oyster beds within 100 yards of their marshfront residences.
2. The project fails to identify the adjoining developed property owners in Hogg Hummock of the marshfront tracts. These identifications should include all owners of developed parcels fronting the marsh along Banks Road in Hogg Hummock; those parcels that front the marsh on the peninsula known as Hogg Hummock Lot 24; those parcels accessed via Old Field Road in Hogg Hummock; and all other developed parcels within Hogg Hummock that front on the marsh running between Hogg Hummock, Nannygoat Beach, and Cabretta Island. Current interior square footages and the number of bedrooms and bathrooms of the homes in adjoining upland areas should be verified against County health department records for septic tank permits to determine whether the adjoining marsh areas are unreasonably subject to septic tank spills that might further impact the project area.
3. Property owners described in 2. may have engaged in harvesting oysters from the project description area during the period 2000 - 2026, resulting in oyster bed depletion, but none of that history is revealed in the project documents. It is difficult for the public to understand why this project is being permitted without first fully revealing the project area's history and traditional uses. The commencement of the project without such an assessment is unreasonable.
4. Instead of conducting this project very near populated areas where oyster harvesting is known to have occurred, this demonstration project should be developed well away from populated areas. One possibility might be the area of known existing severe erosion along the south side of Blackbeard Creek, which runs between the Raccoon Bluff subdivision of Sapelo Island and Blackbeard Island.

5. A thorough review of past oyster harvesting activity in the proposed project area should be conducted by Georgia DNR before permitting. Any member of the DNR Coastal Marshland and Shoreline Protection Committees from 2000 to 2026 who owns marshfront property adjoining the project area should be plainly identified; any member of the McIntosh County Board of Commissioners who also serves on the DNR Marshland Protection Commission at present should also be identified as well as recused from the permitting decision, as the project documentation includes a McIntosh County ordinance compliance review and statement of compliance. This historic review, part of a thorough Environmental Impact Statement, should include recorded interviews with owners of marshfront private residences and marshfront rental homes prior to permitting this project.

Thank you in advance for accepting my comments and for any responses or clarifications that you may be able to provide.

Andy Desmond
Resident, Hogg Hummock Community
Sapelo Island
desmond.andy@gmail.com
678-570-7163



Virus-free www.avast.com

From: [Bill Hodges](#)
To: [Tobler, Paul](#)
Cc: [Haymans, Doug](#); [Noble, Josh](#)
Subject: UGA Oyster Reef Restoration and Enhancement-Sapelo
Date: Tuesday, January 20, 2026 1:21:24 PM

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Paul,

I am speaking neither in favor nor against the subject CMPA application, though I do have several items DNR and the committee should consider. These include:

1. Since the actual sites are only approximate, I believe it would be appropriate to have a registered surveyor provide a survey of the actual locations where installed. This would provide a good record should a hurricane or other storm relocate the cultch materials. With 100 discreet sites, this would be appropriate.
2. The layout map is not at a scale where an interested person can actually determine the location of the 100 sites. I recommend a map be prepared at a scale no greater than 1"=100' to provide a better picture of where the sites are being installed. This map should also show routes on both the upland and the marsh for delivery of these materials to the sites. This activity will disturb the marsh and the public should be made aware of all areas of disturbance during installation of the cultch materials.
3. I have requested public involvement from the applicant over the past many months. There has been no public involvement and this is a major deficiency in this project. Those of us residing in the community where this work is being carried out should be provided good and complete information since the marshes are being impacted. I request DNR and the committee require public involvement.
4. Any material deposited in the marsh that is anything other than the oyster shell, should be removed from the marsh at the conclusion of the project. A demonstration from the applicant should be made to the DNR that this has been completed within 180 days after completion of the project.
5. A final report on the success or failure of the project shall be completed at the conclusion of the project. This report should detail all work completed, the survey of sites, the demonstration of removal of extraneous materials, and any other information to help the committee and the public understand the findings from this project.

Thank you for your consideration of these comments.
Bill

WILLIAM F. HODGES, PE
P.O. Box 39, Sapelo Island, GA 31327
116 Arthur J. Moore Dr., St.Simons Is., GA 31522

(478)-319-3333 Cell

(912)-485-2333 Sapelo

February 13, 2026

Coastal Marshlands Protection Committee
ATTN: Mr. Paul Tobler
Department of Natural Resources
Coastal Resources Division
One Conservation Way
Brunswick, Georgia 31520



*RE: Comments on UGA proposed oyster restoration and
enhancement project on Sapelo Island, GA*

Dear Mr. Tobler and the Coastal Marshlands Protection Committee,

Thank you for the opportunity to submit comments regarding the application to the Coastal Marshland Protection Act (CMPA) Committee. Please accept these comments on behalf of the 1,500 members of One Hundred Miles (OHM), a non-profit organization dedicated to protecting Georgia's 100-mile coast through education, advocacy, and community engagement.

OHM supports oyster habitat restoration throughout our coast, but **we recommend the CMPA Committee postpone approval this application until the applicant and the U.S. Army Corps of Engineers (ACOE) have followed proper protocol to fully evaluate the historic factors affected by this project, as required in the National Historic Preservation Act.**

The project site is part of a designated a historic district recognized on the National Register of Historic Places.

In 1996, Hog Hammock was recognized by the U.S. Department of Interior, National Parks Service as a historic district. According to the National Register of Historic Places Registration Form approved in 1996, Hog Hammock, "... is considered the only intact, viable, historic African-American settlement remaining on a Georgia coastal island. The community has preserved cultural traditions, variations of the Gullah language, and other aspects of life that grew out of the slave and African heritage," (Pg. 6 - National Register of Historic Places Registration Form, 1996). This historic designation was granted because of the substantial "Ethnic Heritage" and "significant community planning and development" – in particular the layout of the land plats. Specific to the marsh and tidal creeks, the Federal Register, states that historically the land lots "...ran eastward toward the marsh and areas for boat docking." (Pg 25, National Register of Historic Places Registration Form, 1996).

Since the birth of the Hog Hammock community, this specific area has been populated by the Gullah Geechee families of Sapelo Island. Historically the creeks and marshes affected by the project have been and continue to be places where residents gather seafood. Descendents have depended on Cabretta and Big Hole Creeks for food and recreation for generations.

Any activity in ancestral creeks must comply with the proper regulatory process.

The ACOE issued a "provisional verification" for the applicant's use of the Nationwide Permit 27 (NWP 27) (see ACOE letter submitted to Mr. Clifton Brock Woodson of the University of Georgia on December 8, 2025).¹ However, the letter and subsequent conversations with the ACOE prove that the **federal agency has not yet fulfilled their statutory responsibility for permitting a project affecting a historic district.** The letter to Mr. Woodson does not indicate that the appropriate historical evaluations or consultation with the State Historic Preservation Office was ever conducted prior to the provisional verification being issued for this project.

A condition of NWP 27 authorization is the fulfillment of all general conditions of the NWP review, on the cultural and historic impact of this project proposed in and near a place listed on the National Register of Historic Places.

Federal code 33 CFR 320.4(a)(1)) requires several public interest review factors be evaluated before the ACOE can approve a NWP for projects affecting waters of the United States. "General Conditions" are required to be considered for all NWP reviews, including twenty (20) public interest factors as outlined in federal code 33 CFR 320.4(a)(1):

"For each of the 20 public interest review factors, the extent of the Corps consideration of expected impacts resulting from the use of this NWP is discussed, as well as the reasonably foreseeable cumulative adverse effects that are expected to occur. The Corps decision-making process involves consideration of the benefits and detriments that may result from the activities authorized by this NWP."²

When issuing NWP 27, the ACOE is obligated to comply with all NWP General Conditions, including all "public interest factors." General Condition #20 focuses on activities on or in historic properties:

20. Historic Properties. (a) No activity is authorized under any NWP which may have the potential to cause effects on properties listed, or eligible for listing, in the National Register of Historic Places until the requirements of Section 106 of the National Historic Preservation Act (NHPA) have been satisfied.³ (emphasis added).

The primary "public interest factor" that the ACOE evaluated and developed special conditions for relate to the West Indian manatee, a known endangered species in the

¹ The NWP 27 information was not included in the CMPA application packet available online. OHM staff requested the ACOE NWP 27 letter/information from CRD. Mr. Paul Tobler sent the letter via email on Feb. 12, 2026.

² Appendix B – Public Interest Review – pages 96-102.

<https://usace.contentdm.oclc.org/utills/getfile/collection/p16021coll9/id/3175>

³ The 2026 Nationwide Permits, General Conditions, District Engineer's Decision, Further Information, and Definitions were published in the Federal Register on January 8, 2026 (91 FR 768). Page 50 - <https://usace.contentdm.oclc.org/utills/getfile/collection/p16021coll9/id/3209>. And 2026 Nationwide Permit 27 – Final Decision Document - page 97

<https://usace.contentdm.oclc.org/utills/getfile/collection/p16021coll9/id/3175>

area. Protection of endangered species is a special interest listed as factor # 18 of the NWP General Conditions.⁴ **In the collective failure to recognize Hog Hammock as a historic district, and ACOE failed to fully evaluate the district impacts or consult with the State Historic Preservation Office.** Such evaluations and consultations could recognize unforeseen consequences of the project and possible conditions to mitigate for potential impacts on the ancestral waters. OHM will be requesting that the ACOE reassess the affects determination made for this project because the agency's failure to follow proper protocol.

After the proper federal evaluations are completed, CRD should condition the CMPA permit with water quality monitoring in Big Hole and Cabretta Creeks.

As mentioned previously, the creeks and marshes around Sapelo Island are part of the identity of Hog Hammock residents. Subsistence fishing and oyster harvesting have been part of the descendants' history for generations and is expected to continue. Also, there is no centralized wastewater treatment in Hog Hammock, so all the homes employ on-site septic systems to treat wastewater. Some of these septic systems are maintained, but many are not. With rising sea levels and increasing frequency of storm events, it is likely that septage is leaking into the waterways around Hog Hammock, introducing harmful bacteria into waterways and marshes.⁵

With the addition of 100 new oyster clutch locations, CRD and the applicant should anticipate that oyster harvesting will occur, even outside the harvest window. To ensure the safety of residents, we recommend that CRD add Big Hole and Cabretta Creeks to the waterbodies where testing occurs monthly.⁶ Alternatively, a condition of the CMPA permit could be to require the applicant to conduct monthly tests and submit them to CRD for review to ensure harmful bacteria are not contaminating the oysters.

Oyster habitat restoration is good for our coast and our collective water quality. But any permitting of restoration projects and other projects in our tidal areas must include **consideration of impacts to historic properties, as much as impacts to endangered species.** The Hog Hammock community is one of the most significant cultural settlements in the State of Georgia, a fact only reinforced by its rightful place on the National Registry of Historic Places. If the CMPA Committee approves this application without proper historic evaluation and community engagement, the state and federal government are setting a negative precedent for permitting activities in state and federal waters.

⁴ The 2026 Nationwide Permits, General Conditions, District Engineer's Decision, Further Information, and Definitions were published in the Federal Register on January 8, 2026 (91 FR 768). Pages 46 - 49 <https://usace.contentdm.oclc.org/utis/getfile/collection/p16021coll9/id/3209>

Factor #18 – page 49 - <https://usace.contentdm.oclc.org/utis/getfile/collection/p16021coll9/id/3209>
⁵ Septic Tanks Threaten Water Quality on Georgia's Coast as Sea Levels Rise" Pulitzer Center (March 1, 2020) <https://pulitzercenter.org/stories/septic-tanks-threaten-water-quality-georgias-coast-sea-levels-rise>

⁶ CRD Website. Shellfish- Recreation <https://coastalgadnr.org/Shellfish/Recreational>

Thank you for your consideration. Again, we respectfully request that the CMPA Committee postpone the approval of this CMPA permit until the ACOE fulfills its obligation to evaluate the impact this project will have on Hog Hammock and the residents within. Please contact me at any time if I can be of further assistance – alice@onehundredmiles.org or 912-230-6494.

Sincerely,

A handwritten signature in black ink, appearing to read "Alice M. Keyes", with a long, sweeping horizontal line extending to the right.

Alice M. Keyes
One Hundred Miles
Brunswick, GA

From: [CH Rader](#)
To: [Tobler, Paul](#)
Subject: Oyster Reef Restoration project review -- more time needed to include State Historic Preservation Commission due to National Historic District designation
Date: Saturday, February 14, 2026 4:56:01 PM

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Mr. Nobler,

I and other Sapelo Island residents would like to know if any cultural and historic review is required for this project. The Coastal Marshland Protection Act is impacted by National Historic District designation which this project falls under. It is a part of the Hogg Hummock National Historic District boundary. Please advise. The Big Hole area is of major cultural, historic and environmental significance.

The project needed a community wide public hearing by CRD and the Corps due to the above and I am concerned if it goes forward without one.

Thank you,

Carolyn Henry Rader

Carolyn H. Rader, AICP
678-576-2857

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.

From: [Josiah Watts](#)
To: [Tobler, Paul](#)
Subject: re: Sapelo Oyster Restoration - Big Hole permitting
Date: Saturday, February 14, 2026 4:58:53 PM

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February 14, 2026 _____

Coastal Marshlands Protection Committee
ATTN: Mr. Paul Tobler Department of Natural Resources
Coastal Resources Division
One Conservation Way
Brunswick, Georgia 31520

Re: Comments on UGA proposed oyster restoration and enhancement project in the nationally Historic Gullah Geechee Community of Hogg Hummock, Sapelo Island that was recognized on the Federal Register of Historic Places in 1996.

Mr. Tobler,

Thank you for the opportunity for public comment about this project.

I would recommend that there be a postponement of any decision on this application for a number of reasons.

The applicant/applicants should have to come before the community and the public to clearly allow time for collective community input in a community space that is not connected to any party benefitting from the project. This would allow for true community input in a project that has apparently already been going on for more than a year.

There is no clear identification of who exactly the applicant is in this matter. It's simply not very clear in the application. The historic community of Hogg Hummock; especially the Gullah Geechee residents, landowners, and descendants, need to know who exactly is proposing this project so as to fully understand the project, bring about transparency, and how this project even began. Are there any conflict of interests with any parties and/or landowners connected to the project and those who will primarily benefit? What is the relationship to the adjoining landowners that will benefit the most from the project by the already chosen locations? Those individuals and land owners would literally have ready made oyster beds within feet of their marshfront properties. From looking at the chosen locations the majority of these residents are not Gullah Geechee. In fact; out of the 100 locations most of them will benefit landowners that are not of Gullah Geechee ancestry. So

we need a map that details out that information clearly and publicly.

The community needs to know if there was any discussion about the historical significance of 'Big Hole' and if so; why that conversation didn't happen with the directly impacted Gullah Geechee community whose ancestors' lineage is directly tied to this waterway historically, religiously, and spiritually. This would be significant reason for postponement. CRD needs to work with the ACOE to discuss working with SHPO, the McIntosh County HPC, and the National Trust regarding the formal 1,000 foot perimeter protection for historical properties such as Hogg Hummock, Sapelo Island.

The application doesn't specifically identify the adjoining property owners that would directly benefit from the chosen locations for the project. This is information that should be in the application for careful review. The community should know who direct beneficiaries of this project just as much as they should know who may not benefit at all. It seems that the biggest beneficiaries from this project are land owners of developed parcels; who are not of Gullah Geechee ancestry. The community should be aware of this since 2.8 million dollars of taxpayer funding of our own funds, are being dispersed for this project.

Proper protocol hasn't been followed regarding full evaluation of the historic and cultural factors affected by the project under the National Historic Preservation Act. The project site is part of a designated historic district recognized on the 1996 National Register of Historic Places. In 1996, Hog Hummock, also known as Hog Hammock, was recognized by the U.S. Department of Interior, National Parks Service as a historic district. According to the National Register of Historic Places Registration Form approved in 1996, Hog Hammock, "... is considered the only intact, viable, historic AfricanAmerican settlement remaining on a Georgia coastal island. The community has preserved cultural traditions, variations of the Gullah language, and other aspects of life that grew out of the slave and African heritage," (Pg. 6 - National Register of Historic Places Registration Form, 1996). Historically the creeks and marshes that would be impacted by this project have been and continue to be places where residents and descendants continue our many cultural traditions. Because of this there should be a delay to discuss better ways to fully engage the community or at minimum to follow historic designation protocol so as to protect the community.

Any activity in ancestral creeks must comply with the proper regulatory process. The ACOE issued a "provisional verification" for the applicant's use of the Nationwide Permit 27 (NWP 27) (see ACOE letter submitted to Mr. Clifton Brock Woodson of the University of Georgia on December 8, 2025).¹ However, the letter and subsequent conversations with the ACOE prove that the federal agency has not yet fulfilled their statutory responsibility for permitting a project affecting a historic district. The letter to Mr. Woodson does not indicate that the appropriate historical evaluations or consultation with the State Historic Preservation Office was ever conducted prior to the provisional verification being issued for this project. A condition of NWP 27 authorization is the fulfillment of all general conditions of the NWP

review. on the cultural and historic impact of this project proposed in and near a place listed on the National Register of Historic Places. Federal code 33 CFR 320.4(a)(1)) requires several public interest review factors be evaluated before the ACOE can approve a NWP for projects affecting waters of the United States. "General Conditions" are required to be considered for all NWP reviews, including twenty (20) public interest factors as outlined in federal code 33 CFR 320.4(a)(1): "For each of the 20 public interest review factors, the extent of the Corps consideration of expected impacts resulting from the use of this NWP is discussed, as well as the reasonably foreseeable cumulative adverse effects that are expected to occur. The Corps decision-making process involves consideration of the benefits and detriments that may result from the activities authorized by this NWP."2 When issuing NWP 27, the ACOE is obligated to comply with all NWP General Conditions, including all "public interest factors." General Condition #20 focuses on activities on or in historic properties:

Section 106 - Historic Properties. (a) No activity is authorized under any NWP which may have the potential to cause effects on properties listed, or eligible for listing, in the National Register of Historic Places until the requirements of Section 106 of the National Historic Preservation Act (NHPA) have been satisfied.3 (emphasis added). The primary "public interest factor" that the ACOE evaluated and developed special conditions for relate to the West Indian manatee, a known endangered species in the area. Protection of endangered species is a special interest listed as factor # 18 of the NWP General Conditions. 4 In the collective failure to recognize Hog Hammock as a historic district, and ACOE failed to fully evaluate the district impacts or consult with the State Historic Preservation Office. Such evaluations and consultations could recognize unforeseen consequences of the project and possible conditions to mitigate for potential impacts on the ancestral waters and cultural traditions. SICARS is asking that the ACOE reassess the affects determination made for this project because of that very failure to follow proper and transparent protocol.

We don't have any real context of why these specific areas within feet of and near certain specific parcels were chosen. Not knowing the clear guided reasons is enough to delay any decision on this permitting matter. This is important since a significant number of these locations happen to be near developed parcels from residents/landowners that aren't Gullah Geechee descendants. We need to know and understand the communications that led to these decisions. That is important. When SICARS did a GORA to get additional information about this project they were quoted a price upwards of \$15,000 for emails to try to find out about the decision making for this project. Until that is known CRD should delay any permit approval and require transparency of communications that led to these specific decisions within the permit application.

There should be a thorough review of past oyster harvesting activity in the proposed project area before any permitting. Any member of the DNR Coastal Marshland and Shoreline Protection Committees from 2000 to 2026 who owns marshfront property adjoining the

project area should be publicly identified; any member of the McIntosh County Board of Commissioners who also serves on the DNR Marshland Protection Commission should also be identified as well as recused from the permitting decision, as the project documentation also includes a McIntosh County ordinance compliance review and statement of compliance. This historic review, part of a thorough Environmental Impact Statement, should include recorded interviews with owners of marshfront private residences and marshfront rental homes prior to permitting this project.

Any process regarding permitting should also go through the McIntosh County HPC (Historic Preservation Commission), State Historic Preservation Office, and the National Trust in order to protect the historic integrity and history of the community.

Any process seeking approval should also go before the Department of Health since you have properties that are literally right next to many of the chosen locations. Those properties have septic tanks. So there needs to be required water quality monitoring for this project for the safety and benefit of the community, but there also needs to be a review by the Department of Health.

Oyster habitat restoration is good for our coast and our collective water quality. But any permitting of restoration projects and other projects in our tidal areas must include consideration of impacts to historic and cultural properties with a designated and clear process, as much as impacts to endangered species like manatees; which are mentioned in this application. I would even say that the people should have even more status when it comes to protecting this community. The Hogg Hummock community, also known as Hog Hammock, is one of the most significant Gullah Geechee cultural settlements in the State of Georgia, a fact only reinforced by its rightful place on the National Registry of Historic Places in 1996 and significance in the Sapelo Island Heritage Authority Act of 1982. If the CMPA Committee approves this application without proper historic evaluation, robust community and public engagement, and involvement of the mentioned agencies in my letter, the state and federal government are setting a negative, and potentially dangerous precedent, for permitting activities in state and federal waters in historic communities like Hogg Hummock, Sapelo Island. Let's take the time to make sure that we are doing this right and not violating protections or inadvertently creating a pathway for others that may not value the Gullah Geechee culture, traditions, and way of life, to do so.

Please feel free to reach out to me should you have further questions about my thoughts and concerns.

Sincerely, _____

Josiah Watts

Sapelo Island Cultural & Revitalization Society - Land Retention Advisor

Hog Hammock Community Foundation - Vice Chair

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From: [Allen Bailey](#)
To: [Tobler, Paul](#)
Subject: Sapelo oyster Project
Date: Saturday, February 14, 2026 10:27:09 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Mr. Tobler, I wanted to email you about the support of the oyster project that is going on on the island. Not only am I a descendant, but also a resident/property owner on the island. We grew up living off the island and its resources.

It is amazing that this opportunity has been present. Over the years with the multiple storms, I have passed through our area. It has definitely changed in landscape. The creek has narrowed, and some of the fishing areas we grew up in are no longer accessible, but what can we say, we all love Mother Nature. I just wanted to say that this is an awesome opportunity and I'm hearing positive things.

Sent from my iPhone

From: [John C Walker](#)
To: [Tobler, Paul](#)
Subject: Public comment on behalf of Bobby Jean Grovner
Date: Saturday, February 14, 2026 12:34:52 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Mr. Tobler,

I am sending public comments for the University of Georgia, Oyster Reef Restoration and Enhancement Project on behalf of Mr. Bobby Jean Grovner, Island descendent and Hogg Hummock community member/landowner:

I'd like to see the project move forward, it will employ folks on the island and lead to better fishing.

Thanks,

John Walker

From: [John C Walker](#)
To: [Tobler, Paul](#)
Subject: Public comment on behalf of Iregene Govener
Date: Saturday, February 14, 2026 12:27:07 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Mr. Tobler,

I am sending public comments for the University of Georgia, Oyster Reef Restoration and Enhancement Project on behalf of Mr. Iregene Grovner, Sr., Island descendent and Hogg Hummuck community member/landowner:

This project will be good for making better fishing habitat and provide jobs on the island.

Thanks,

John Walker

From: [Frankie Strother](#)
To: [Tobler, Paul](#)
Subject: Sapelo Oyster Shell Project
Date: Thursday, February 12, 2026 3:27:18 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Paul. . .

I hope you've been doing well!

Lila Hillery is a long time family friend and keeps us informed about Sapelo Island happenings. Lila shared the situation concerning the lack of oyster shells that once formed an erosion barrier in certain areas of the island and, without those shells, these areas now tend to flood. She tells us the desire of many of the residents is to begin the collection of oyster shells again in an effort to protect the specific eroding areas.

The only similar situation that I have personally experienced is the first Sea Island beach renourishment program in the early 80's. Structures on the Sea Island beach that previously flooded no longer flooded after the renourishment. It was a remarkable thing to watch.

I'm sure there are many scientific pieces to the puzzle that I do not know about and erosion may be different on Sapelo. However, if there are any similarities between the two projects that could prove to be successful I hope you'll consider once again allowing the oyster shells to protect the designated areas.

I hope this letter of support helps.

Thank you.

Frankie

Frankie W. Strother
912-996-6017

From: [John C Walker](#)
To: [Tobler, Paul](#)
Subject: Public comment on behalf of Isadore Wilson, Jr.
Date: Saturday, February 14, 2026 12:31:17 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Mr. Tobler,

I am sending public comments for the University of Georgia, Oyster Reef Restoration and Enhancement Project on behalf of Mr. Isadore Wilson, Jr., Island descendent and Hogg Hummock community member/landowner:

I like this project - helping with flooding and improving fishing opportunities are important to me affect my daily routine on the island.

Thanks,

John Walker