

From: [Sam LaBarba](#)
To: [Tobler, Paul](#)
Cc: susan@onehundredmiles.org
Subject: Re: Letter for The Bluffs at Laurel View dock and bulkhead
Date: Friday, July 11, 2025 6:35:11 AM
Attachments: [image001.png](#)

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Paul,

Sorry I couldn't get this to you yesterday, please see the responses below.

Responses to Public Comments

Objection 1: The development has not been approved by the County.

Response:

This claim is incorrect. The development has been reviewed and approved by Liberty County, as evidenced by the homes currently being built on a couple of the lots. Final recorded plats for the subdivision and each individual lot were submitted with the CMPA application. Liberty County officials have reviewed this project and confirmed that it does not conflict with any applicable zoning ordinances.

Objection 2: The project will increase erosion and shoaling.

Response:

To the contrary, the purpose of this project is to reduce existing erosion on the sandy bluff through the use of proven stabilization measures. By preventing continued sediment loss from the upland, the project will reduce the amount of material entering the river, thereby mitigating downstream shoaling and improving navigability over time.

Objection 3: Parking spaces are located within CMPA jurisdiction.

Response:

This is incorrect. All proposed parking spaces are located landward of the CMPA jurisdiction line. To minimize potential impacts, the applicant has voluntarily proposed the use of gravel rather than impervious surfaces such as concrete or asphalt, in order to preserve natural stormwater infiltration and reduce upland disturbance.

Objection 4: The dock should be shortened.

Response:

The proposed dock length is the minimum required to provide reliable access to navigable water during all tidal conditions. Shortening the dock would result in dry conditions at low tide, rendering it unusable for its intended water-dependent purposes, including boating, fishing, and crabbing. The design represents the least

impactful structure necessary to achieve these essential functions.

Objection 5: A living shoreline should be used instead of a bulkhead and rip rap.

Response:

This alternative was thoroughly evaluated and discussed in the Alternatives Analysis submitted with the application. Due to the site's topography, implementing a living shoreline would require significant grading and excavation to reduce the slope of the bluff. This would drastically increase the overall impact to upland areas and render the adjacent lot functionally unusable. The selected design achieves necessary stabilization with the least total impact.

Objection 6: There is no guarantee that additional docks will not be constructed.

Response:

This concern has been addressed directly. The applicant has agreed to deed-restrict all participating lots to prohibit the construction of individual private docks. This commitment was made in coordination with the Georgia Department of Natural Resources and submitted prior to the public notice period. These restrictions will be recorded in the land records and are binding.

Objection 7: Rip rap will cause various listed negative environmental impacts.

Response:

The concerns raised regarding rip rap are unfounded and do not reflect established engineering or ecological principles. Rip rap is specifically included in the design to provide toe protection and stabilize the base of the bulkhead, thereby reducing scouring and sediment displacement. In many cases, rip rap improves conditions for marsh revegetation by providing protection from wave action and stabilizing the substrate. Moreover, it is essential to the structural integrity of the proposed bulkhead.

Objection 8: Rip rap will increase water temperature and harm aquatic life.

Response:

This claim is unsupported by scientific evidence. The suggestion that shoreline rip rap increases water temperature through light reflection is speculative and lacks credibility. Sunlight would reach the water whether or not rip rap is present. The cited document is not an official FEMA directive or technical guidance—it is an informal discussion published in Washington State that explicitly states:

“This document does not represent the criteria necessary for funding under the various Federal Emergency Management Agency grant programs. The opinions expressed herein may not necessarily represent those of the Federal Emergency Management Agency.”

We caution against presenting opinion documents as authoritative guidance or representing them as established fact.

Closing Remarks:

It is important that objections submitted during the public comment process are grounded in factual, technical, and regulatory context. Several of the objections raised in this letter reflect misunderstandings of the CMPA application materials and governing regulations. Our team has made multiple efforts to engage constructively with the objecting organization, including offers for calls, site visits, and document reviews. These offers have not been accepted.

We remain open to productive dialogue with stakeholders who wish to work collaboratively to preserve Georgia's coast. Our shared goal should be protecting coastal resources through sound science and practical solutions—not simply producing an objection letter for the public record. We encourage future participation to be based on fact-based analysis and respectful engagement that moves our collective stewardship efforts forward.

Sincerely,

Sam LaBarba

Sent via the Samsung Galaxy S21 Ultra 5G, an AT&T 5G smartphone
Get [Outlook for Android](#)

From: Tobler, Paul <paul.tobler@dnr.ga.gov>
Sent: Thursday, July 10, 2025 5:47:16 PM
To: Sam LaBarba <sam@labarbaenvironmentalservices.com>
Subject: FW: Letter for The Bluffs at Laurel View dock and bulkhead

Sam,

Please see attached public comments from 100 miles attached. If you could get me the responses today that would be ideal. We were just getting everything ready to send up when this came in. Let me know if I can help in any way.

Thanks,
Paul D. Tobler
Coastal Permit Coordinator
[Coastal Resources Division](#)
Direct: (912) 689-6261
Main: (912) 264-7218
[Facebook](#) • [Twitter](#) • [Instagram](#)
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A division of the
GEORGIA DEPARTMENT OF NATURAL RESOURCES

From: Susan Inman <susan@onehundredmiles.org>

Sent: Thursday, July 10, 2025 9:49 AM

To: Tobler, Paul <paul.tobler@dnr.ga.gov>

Subject: Letter for The Bluffs at Laurel View dock and bulkhead

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Good morning, Paul,

Attached is a letter with suggestions for The Bluffs at Laurel View, LLC dock and bulkhead project in Liberty County. If you have any questions or concerns, please reach out to me, 321-331-0912.

Susan Inman
Coastal Advocate
One Hundred Miles
Cell: 321-331-0912

