10 July 2025

Sent via email: **paul.tobler@dnr.ga.gov**

Paul Tobler
Department of Natural Resources
1 Conservation Way
Brunswick, GA 31520

RE: The Bluffs at Laurel View, LLC
Construction and Maintenance of a Community Dock and Bulkhead
Laurel View River, Liberty County, GA

Dear Mr. Tobler,

Thank you for the opportunity to submit comments to the Georgia Coastal Marshlands Protection Committee on the permit application submitted by The Bluffs at Laurel View, LLC to construct a community dock and a bulkhead, with the addition of rip rap. These comments are submitted in opposition to the project as it is currently proposed on behalf of One Hundred Miles (OHM), a conservation organization dedicated to the protection of Georgia's 100-mile coast through education, advocacy, and community engagement.

While we support more public access to Georgia's coastal waterways, we are concerned for the impact this private project will have on the surrounding natural resources and public waterways, and that the application is premature for consideration by this Committee.

The application material is incomplete, so the Committee is considering the project prematurely.

The CMPA Committee should not consider this application because it serves a community that has yet to be assigned an address by Liberty County. O.C.G.A. 12-5-286(b) states very clearly that any applicant must include: "(1) The name and address of the applicant" as the very first requirement. The Bluffs at Laurel View's application does not include an address. Google images demonstrate that the property surrounding the area where the dock is proposed is only accessible via a dirt road.

Furthermore, the design of the planned unit development (PUD) the community dock intends to serve has not yet been approved by the Liberty Consolidated Planning Commission. Approved plans for development must validate activities affecting state-owned marshlands. Several documents submitted by the developer of the PUD demonstrate a variety of possible lot designs and subdivisions, but none

of them are consistent or have the stamp of approval from County officials. This Committee should have certainty that the proposed dock project will serve an approved PUD design.

The proposed design will increase erosion and shoaling, negatively impacting navigation of the Laurel View River.

Currently, there are no adjacent neighbors surrounding the affected parcels. A traffic analysis for the Islands Highway Corridor shows future plans for the area include building out the whole coast of Laurel View River (attachment 1). However, due to the site's location near a river bend and sandbar, there is potential for increased erosion at the southside bend (property on the west side of the dock) and shoaling across the Laurel View River proposed dock. Which is most likely the reason for a 200 ft dock, to move away from the already shallow water from current erosion on the property and upstream. The application stated that the proposed work includes the construction of a 200 ft community dock, a 373.9 sq ft bulkhead, and the addition of 2,891 sq ft of riprap to serve nine private lots. All activities are located on a sandy bluff, resulting in a permanent impact on 52% of the 6,201.9 sq ft area within the 50 ft marshland buffer (3,242 sq ft). An additional 4,319 sq ft will be temporarily impacted during the installation of tiebacks for the bulkhead.

To decrease the permanent impacts within the CMPA area, this Committee should recommend relocating the parking spaces out of the CMPA to the south side of the road.

We recommend that the design reduce the extension of the dock to less than 200 ft into the river. By decreasing the length of the dock, the encroachment on the Laurel View River would decrease the impact on the natural flow of navigation by minimizing the chance of increasing the sand buildup on both sides of the river.

The application packet included imagery for the dock site, demonstrating the type of substrate (sugar sand) and the west side of the proposed bulkhead, more sugar sand. Photos below (attachment 2 and 3) are of the shoreline that was included in the online application[1].

The project will unnecessarily harden the shoreline.

The Bluffs at Laurel View's proposal includes a shoreline stabilization combination of a bulkhead and rip rap that can have negative impacts on the surrounding marsh and waterways. The Bluffs at Laurel View proposes to use 2,791 sq ft of rip rap - 1,807 sq ft of rip rap along the "dock area" and 984 sq ft along a portion of the adjoining

[1] https://coastalgadnr.org/bluffs-laurel-view-llc-construction-and-maintenance-community-dock-and-bulkhead-bluffs-laurel-view

western parcel. This combination only increases the negative impacts on public waterways along our coast.

In areas where no existing structures are threatened, bulkheads can cause more harm than good.[2] Initially, a bulkhead stabilizes the upland area, but bulkheads can also cause erosion around the bulkhead.[3] Shoreline hardening can degrade water quality, eliminate marshland, harm habitat, and decrease biodiversity.[4]

Photos of a failing hardened shoreline can be found in the application to this Committee for Skidaway Institute of Oceanography (SKIO), Maintenance of Existing Bank Stabilization Project, Skidaway River, Chatham County, Georgia. Due to this erosion, SKIO is now seeking a replacement.[5] Bulkheads are not ideal for coastal sites that are not subject to high-energy wave action or high-energy tidal velocity. The Laurel View River does move at a high rate due to the proximity to the Medway River and king tide events, which makes a living shoreline a better choice.

The applicant also states that this one community dock is better than having 10 individual docks at each property. This is a great idea for docks, but without an approved site design, this Committee does not have a guarantee that other individual docks will not be constructed.

The project also proposes to install 2,891 sq ft of riprap. While used regularly in our coastal environment, rip rap can also cause lasting harm to the surrounding areas. The effects of rip rap do not stop at the point of installation. When positioned along a section of riverbank, rip rap tends to:

- Increase the speed of water flow along the armored reach, causing a faster and stronger flow on downstream riverbanks. This increase in speed and strength of the water only increases erosion at new locations.
- Impedes the natural functions of a shoreline, i.e., Storm impacts, edge zones for wildlife;
- Increase the scour at the toe and ends of the rip rap;
- Create a uniform, smooth channel, with no complexity of vegetation, utilized by a variety of wildlife species;
- Suffer from structural integrity issues during and after high-water events. Losing rocks to high water or fast flows, the structure begins to fail, and we introduce new rocks into our sandy coast;

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[2] SAMANTHA A. BURDICK, EFFECTS OF BULKHEADS ON SALT MARSH LOSS: A MULTI-DECADAL ASSESSMENT USING REMOTE SENSING 20 (Apr. 27, 2018), https://dukespace.lib.duke.edu/dspace/bitstream/handle/10161/16557/SBurdick_MP.pdf?sequence=1 .

[3] LARRY KEATING & DANA HABEEB, GA. INST. OF TECH., TRACKING THE EFFECTS OF SEA LEVEL RISE IN GEORGIA'S COASTAL COMMUNITIES iii (2012), https://repository.gatech.edu/bitstreams/df427a6a-eccb-46d3-ac53-fb42000dce17/download.

[4] *Id. See also What Is a Living Shoreline?*, NAT'L OCEANIC & ATMOSPHERIC ADMIN., https://oceanservice.noaa.gov/facts/living-shoreline.html (last visited Sept. 29, 2023).

[5] https://coastalgadnr.org/skidaway-institute-oceanography-maintenance-existing-bank-stabilization-project-10-ocean-science

- With sea levels rising, hard armoring will not be able to adjust to higher tides, and
- Have a considerable negative effect on wildlife that live and use this marshline.

The Federal Emergency Management Agency (FEMA) also reports, "In areas of low vegetation, when exposed to direct sunlight, the rocks that comprise riprap can reflect light into the water, which **increases water temperatures to an unhealthy degree for fish**. Riprap also tends to suffer from structural integrity issues during and after high-water events,"[6] (emphasis added).

Georgia's Green Growth Guidelines[7], developed by the Coastal Resources Division, states that shoreline armoring should be a last resort, only implemented in conditions with "(m)ajor erosion with high risk, natural buffers absent or not feasible."

Landowners have installed living shorelines throughout the Georgia coast in and near the marsh. The examples below offer great case studies for how the process works, how much it costs, and how the design can protect habitat and property that connects to the marsh on the east side.

Little St Simons Island [8]:
- Mosquito Creek- 285 linear ft
- Beach Bridge Rd on Little St Simons Island

Cannon's Point Preserve [9] - 270 linear ft
Post Office Creek, Sapelo Island:
- Ashantilly (community dock)- 370ft embankment
- Long Tabby- 230 linear ft

Burton 4-H Center on Horse Pen Creek, Tybee- 390ft linear living shoreline
Skidaway Island State Park- 110 linear ft of living shoreline
Coastal Resources Division in Brunswick- 160 linear ft of living shoreline
Tolomato Island- 95 linear ft
Little Cumberland Island- 202 linear ft living shoreline
Julienton River, Townsend- 132 linear ft of living shoreline (approved in Jan 2025)

Conclusion

To conclude, I reiterate OHM's recommendation that the Committee deny the CMPA request to construct a community dock and employ hardening shoreline stabilization methods at The Bluffs at Laurel View for the following reasons:

[6] https://www.fema.gov/txt/about/regions/regionx/Engineering_With_Nature_Web.txt
[7] https://coastalgadnr.org/GGG
[8] https://www.littlestsimonsisland.com/blog/living-shoreline
[9] https://www.sslt.org/index.php/cannon-s-point/research/living-shoreline

- The Bluffs at Laurel View is undeveloped, and no structures are threatened by the erosion occurring.
- The proposed bulkhead at The Bluff at Laurel View would be the first of its kind in this area and would increase scouring and unnecessary erosion of the bank at the proposed bulkheads, [10].
- Living shorelines should be the stabilization method employed at this site. Not far from this site is an application for a 243 linear sq ft living shoreline being considered by the Committee. If the Seabrook Village Foundation can install a living shoreline on Carrs Neck Creek at Martha Randolph Stevens Park (7162 Islands Hwy, Liberty County, Georgia) then The Bluffs at Laurel View, LLC, can too.
- 52% (3,242 sq ft) of the CMPA area will be permanently impacted.

Should the Committee deny the application as it is currently proposed and the applicant chooses to proceed at a later date, we recommend that the applicant:

1. Finalize the development design for the subdivision so the application includes an address and that the community dock will be the only dock to serve as water access for the multiple homes.
2. Reduce the length of the dock that extends into the Laurel View River.
3. Install a living shoreline as opposed to bulkheads and rip rap.
4. Move the parking spaces out of the CMPA buffer to the south side of the road.

Thank you again for the opportunity to support this project. Contact me at any time if you have any questions or need additional information (susan@onehundredmiles.org or 321-331-0912).

Sincerely,

Susan Inman

Susan Inman
Mid Coast Advocate
One Hundred Miles

Attachments below:

[10] LARRY KEATING & DANA HABEEB, GA. INST. OF TECH., TRACKING THE EFFECTS OF SEA LEVEL RISE IN GEORGIA'S COASTAL COMMUNITIES iii (2012), https://repository.gatech.edu/bitstreams/df427a6a-eccb-46d3-ac53-fb42000dce17/download.

Attachment 1: Map of future growth of the east side of I-95 at Exit 76 (Midway, GA

Attachment 2: View of The Bluff at Laurel View River bank. Included in the online application

Attachment 3: rendering of the bank at The Bluffs at Laurel View included in the online application