

October 1, 2012

Ms. Emily Hughes
U.S. Army Corps of Engineers
Wilmington District Regulatory Division
69 Darlington Avenue
Wilmington, NC 28403

Re: Scope of EIS for the Town of Ocean Isle Beach's proposed East End Shoreline Protection Project (Terminal Groin)

Dear Ms. Hughes:

The Town of Sunset Beach respectfully submits the following comments concerning the scope of a Draft Environmental Impact Statement for the proposed terminal groin for the Town of Ocean Isle Beach.

In 2011, the Town of Sunset Beach opposed legislation allowing terminal groins. The Town's message to State Legislators stated that if the legislature approved terminal groins, eight recommendations from the North Carolina Coastal Resources Commission (CRC) about the permitting process should be included in the legislation.

Because terminal groins were approved by the legislature in Senate Bill 110 (SB110), which included the CRC recommendations, Sunset Beach has a stake in commenting on the scope of an Ocean Isle Beach Draft Environmental Impact Statement (DEIS).

- The DEIS must adequately address the down-drift ocean-side environmental impact well beyond the proposed groin. Coastal scientists have long warned about down-drift effects, including effects on adjacent islands. In an open letter signed by 43 of the country's top coastal scientists, the scientists state, "there is no debate: A structure placed at the terminus of a barrier island, near an inlet, will interrupt the natural sand bypass system, deprive the ebb and flood tide deltas of sand and cause negative impacts to adjacent islands."¹ And, "permitting the construction of terminal groins will harm the coast and place down-drift property at risk."²
 - The DEIS must propose adequate funding for monitoring the environmental effects of the groin, as the law requires, along with monitoring or mitigation on adjacent islands and estuaries. We
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note that the Town of Sunset Beach agrees with the comments submitted by Todd Miller and Ana Zivanovic-Nenadovic to Bob Emory, Chair, Coastal Resources Commission, in the attached June 14, 2012 memorandum enumerating in part the shortcomings of a draft DEIS for Figure 8 Island, and discussing what should be in a proper DEIS, in our opinion, for any terminal groin project.

- If the groin causes damage to nearby islands or estuaries, the DEIS must propose appropriate funding for mitigation, as the law requires, as well as provisions for removal of the groin. All funding should be placed in escrow and monitored by the Corps of Engineers in accordance with its standard practices.

The DEIS in question is of vital concern to Sunset Beach, which is directly down-drift from Ocean Isle. As so eloquently stated by Dr. Len Pietrafesa, Professor Emeritus, North Carolina State University, and one of the premier coastal scientists in North Carolina, “A groin at the east end of Ocean Isle Beach will deprive sand from a half mile west of Shallotte Inlet, including the central and west end of Ocean Isle and all of Sunset Beach...” And, “If Ocean Isle Beach installs a groin, Sunset Beach will suffer.” Finally, “Certainly the land downstream of the structures will be deprived of sediments, as shown over and over...Pity the homeowners at the central and west end of OIB, and pity the homeowners of Sunset Beach, an island only 3.5 mi long and in the lee of OIB.”^{3,4,5} We ask that you ensure the protection of the properties down-drift of any terminal groin installed on Ocean Isle, and consider the impact on the Town of Sunset Beach before any terminal groin is approved.

For the sake of the entire coast of North Carolina, please ensure that any DEIS done for the Ocean Isle Beach project adequately addresses the concerns listed above.

Respectfully submitted,

Rich Cerrato, Mayor
Town of Sunset Beach

Attachment: Todd Miller, NC Coastal Federation Letter to Bob Emory, Coastal Resources Commission

¹ http://www.wcu.edu/WebFiles/PDFs/Coastal_Scientist_Groin_Statement.pdf

² <http://www.wcu.edu/4402.asp>

³ Dr. L. J. Pietrafesa. Letter to the *Brunswick Beacon*. 4-16-12

⁴ L. J. Pietrafesa. “On the Continued Cost of Upkeep Related to Groins and Jetties,” published in the *Journal of Coastal Research*, September 2012.

⁵ Dr. L. J. Pietrafesa. Letter to the *Brunswick Beacon*. 3-1-11
