

Environmental Advisory Committee

4:00 p.m., Wednesday, February 21, 2024 Council Chambers 1207 Palm Boulevard, Isle of Palms, SC 29451

Agenda

- 1. Call to order and acknowledgment that the press and the public have been duly notified of the meeting in accordance with the Freedom of Information Act
- 2. Citizen's Comments
- 3. Approval of previous meeting's minutes January 16, 2024
- 4. Presentations
- 5. Old Business
 - i. Wildlife- discussion of native plant exhibition and classes
 - ii. Litter- discussion of belly board waste
 - iii. Water Quality- update on potential water quality testing program
 - iv. Climate Action- update on grant requests
 - v. Update on Sea Level Rise Adaptation RFP
- 6. New Business
 - i. Review of 2023 accomplishments list
 - ii. discussion of hard erosion control on the beaches
- 7. Miscellaneous Business

Next meeting date: 4:00 p.m., Wednesday, March 20, 2024

8. Adjournment



ENVIRONMENTAL ADVISORY COMMITTEE

4:00pm, Thursday, January 17, 2024 1207 Palm Boulevard, Isle of Palms, SC

and broadcasted live on YouTube: https://www.youtube.com/user/cityofisleofpalms

MINUTES

1. Call to order

Present: Sandra Brotherton, Mary Pringle, Belvin Olasov, Todd Murphy, Laura

Lovins (via phone), Dane Buckout, Lucia Spiotta

Absent: Doug Hatler, Jordan Burrell

Staff Present: Director Kerr, Zoning Administrator Simms, Council Member Miars

2. Election of Chair and Vice Chair

Mr. Olasov nominated Dr. Brotherton as Chair of the Environmental Advisory Committee. There being no other nominations, a vote was taken with all in favor.

Ms. Pringle nominated Ms. Lovins as Vice Chair of the Environmental Advisory Committee. There being no other nominations, a vote was taken with all in favor.

Dr. Brotherton will serve as Chair and Ms. Lovins will serve as Vice Chair of the Environmental Advisory Committee.

3. Approval of previous meeting's minutes

MOTION: Ms. Pringle made a motion to approve the minutes of the December 14, 2023 meeting, and Mr. Murphy seconded the motion. The motion passed unanimously.

Dr. Brotherton welcomed the new members, Laura Lovins, Dane Buckout, Todd Murphy, and Lucia Spiotta.

- 4. Citizen's Comments -- none
- 5. Old Business

A. Wildlife

Ms. Pringle said that Sharleen Johnson's native plants presentation at the Recreation Center was well attended and well received.

Discussion ensued about the Committee's participation in a Sullivan's Island Earth Day event on April 27. Dr. Brotherton will compile a 2023 annual review of the Committee's accomplishments to be used a handout encouraging the formation of a similar committee in other

municipalities. Ms. Lovins will speak with the Audubon Society about including materials regarding the protection of shorebirds. She will also represent the Committee at the table that day.

Director Kerr reported that the Ms. Johnson's plan for the native plants garden on the Water & Sewer Commission's property was well received by the Commission members. Since they are unsure when they will be putting a pump station on that property, they will have their attorney draw up a 2-year license agreement for the Committee's garden. A longer term could be negotiated at the end of two years if the Commission is not ready to build the pump station.

After further discussion, it was decided that Zoning Administrator Simms will speak with Ms. Johnson about scheduling additional classes at the Recreation Center, dates for the preparation and planting of the site, and the appropriate number of volunteers needed to help. Ms. Pringle noted that the IOP Chamber of Commerce, not the Exchange Club, will be donating the benches for the garden.

Ms. Pringle and Director Kerr spoke about the establishment of a Purple Martin colony at the garden site. She said it might take longer than two years to establish a colony. She will discuss it further with the resident who will be providing the housing for the colony.

Ms. Pringle also reported that she helped complete the annual bald eagle nesting survey, and four nesting areas have been found. She also shared information about three stranded green turtles in nearby waters in December.

B. Litter

Dr. Brotherton said there is no update on litter this month.

C. Water Quality

As Mr. Hatler was not present to give an update on these efforts, Director Kerr shared the work of this subcommittee with the new members of the Committee.

D. Climate Action

Mr. Olasov reported that Zoning Administrator Simms was able to complete the grant application for solar panels on the Public Works building ahead of the deadline.

E. Update on Sea Level Rise Adaptation RFP

Director Kerr said Seamon Whiteside is setting up a meeting with the technical engineers overseeing the City's infrastructure related to sea level rise. They will set up public meetings after that.

F. **Breach Inlet Update**

Director Kerr said the selection of a contractor for this project has been delayed due to a technical issue on the Federal level. The project manager for the Army Corps of Engineers' project and the City's coastal engineer will provide an update to the City Council at next week's meeting.

6. New Business

Ms. Lovins said the Sierra Club will host Leslie Lenhart of the SC Environmental Law Project who will give a talk on septic tanks on March 7. Details on time and location will be forthcoming.

Mr. Olasov would like all Committee members to introduce themselves at the next meeting since there are several new members.

Dr. Brotherton asked if there is a space on the City's website where efforts of the Committee – glass recycling, native plants, composting – can be hosted for anyone who is new to the island and or the works of the Committee. Director Kerr will speak with the PR Officer about adding that information to the website.

Ms. Pringle thanked Mr. Murphy for taking on the phytoplankton monitoring at the Sea Cabins pier.

7. **Miscellaneous Business**

8. Adjournment

Committee members discussed the possibility of moving the regular meeting time to the 3rd Wednesday of the month. The next meeting of the Environmental Advisory Committee is tentatively scheduled for Wednesday, February 21, 2024 at 4pm.

Mr. Murphy made a motion to adjourn, and Ms. Pringle seconded the motion. The meeting was adjourned at 5:03pm.

Respectfully submitted,

Nicole DeNeane City Clerk

Douglas Kerr

From: Matt Simms

Sent: Wednesday, January 24, 2024 8:56 AM

To: Belvin Olasov; Belvin Olasov; Dane Buckout; Doug Hatler; Doug Hatler; Jordan Burrell; Laura Lovins;

Lucia Spiotta; Mary Pringle; Mary Pringle; Sandra Brotherton; Todd Murphy

Cc: Douglas Kerr

Subject: Native Plants Schedule of Events

Good morning all,

We have been working with Sharleen to schedule the demonstration garden site preparation, garden planting day, and native plants talks. Here are the following dates for all the events:

- 1. **Gardening with Native Plants for Bees (Native Bees + Honey Bees)** Thursday, February 15th, 6:30pm at the IOP Recreation Center
- 2. Gardening with Native Plants for Butterflies Thursday, February 27th, 6:30pm at the IOP Recreation Center
- 3. Garden site preparation Thursday, February 29th, 10:30am at the 7th Avenue Triangle
- **4.** Underappreciated Pollinators: Beetles, Flies, Wasps, and more! Tuesday, March 5th, 6:30pm at the IOP Recreation Center
- 5. **Garden planting** Thursday, March 14th, 10:30am at the 7th Avenue Triangle

Feel free to let me know if you have any questions.

Thank you! Matt

Matt Simms
Zoning Administrator
City of Isle of Palms
P.O. Drawer 508
Isle of Palms, SC 29451
(p) 843-886-9912
(f) 843-886-8005

*** WARNING *** All e-mail correspondence to and from this address may be subject to public disclosure under the South Carolina Freedom of Information Act (FOIA).



Office of Solid Waste Reduction and Recycling FY2025 Solid Waste Reduction & Recycling Grant Grant Proposal Instructions

DHEC's Office of Solid Waste Reduction and Recycling (Office) is accepting proposals from South Carolina local governments and regions for the implementation or expansion of waste reduction and/or recycling projects.

A local government is a county, municipality, or any other political subdivision located wholly or partly within the county where such political subdivision provides solid waste management services. A region is a group of counties that has submitted a regional solid waste management plan to the department.

Submittal Instructions

Requests should be submitted electronically. If electronic submission presents a problem, please contact the Office for other submission options.

Requests will be accepted starting Monday, February 5, 2024, through 5:00 p.m. (EDT) on Friday, April 5, 2024.

Requests should be submitted in PDF or Microsoft Word format (.doc or .docx).

Requests received after the deadline will not be considered.

Incomplete submissions will not be considered. All questions must be thoroughly answered.

Faxed copies will not be considered.

Use this application only. Applications from previous years will not be accepted.

Electronic submissions should be emailed to swgrants@dhec.sc.gov

Please refer to the enclosed Grant Guidelines for eligibility requirements.

For additional information, please contact Stefanie Vandiver at 803-898-1354 or Grace Anne Martin at 803-898-0998 or email swgrants@dhec.sc.gov.

NOTE: This offering does not commit DHEC to award a grant, to pay any cost incurred in the preparation of the proposal, or to procure or contract for articles of goods or services. DHEC reserves the right to accept or reject any or all proposals received as a result of this offering, or to cancel in part or in its entirety this offering if it is in the best interest of the State to do so.

FY2025 Solid Waste Reduction and Recycling Grant Program

Grant Purpose:

The purpose of the Solid Waste Reduction and Recycling Grant program is to assist local governments and regions in their efforts to achieve the recommended state municipal solid waste (MSW) recycling goal of 50 percent and achieve the recommended MSW disposal goal of 3.25 lbs. or less per person per day by 2030. Grant awards are anticipated in two grant categories. Local governments may apply for one or both grant awards:

1. General Recycling Solid Waste Grant.

A general recycling and outreach/education grant is offered for residential or commercial projects that support recycling; efforts directed at decreasing contamination of residential recyclables; and/or, residential and backyard composting. The general recycling grant will have maximum awards up to \$15,000 per local government, where funds allocated for outreach/education of this total will not exceed \$5,000.

2. Creativity with Waste Reduction Grant.

Three to six very competitive and creative waste reduction grants will be offered for projects that have new ideas for supporting recycling, composting, and/or waste prevention. The Office will award up to SIX grants based on the quality of the application. The recycling innovation grants will range from \$50,000 to \$100,000 in what is awarded.

Grant Conditions:

- All outreach/education materials may make use of the Office's educational campaigns (i.e., Recycle Right SC, Don't Waste Food SC, Composting: Recycling Naturally, See It Report It). Other campaigns may be considered.
- The evaluation of general recycling grant proposals will give special consideration to new programs, new or innovative projects, or projects that expand existing programs.
- Waste reduction innovation funds will be awarded on a competitive basis to up to three but no more than six applicants that demonstrate a detailed plan consistent with the grant goal. The evaluation of grant proposals will give special consideration to new or innovative projects.
- Recurring expenses, indirect costs, professional development, and equipment repair costs will not be considered.

Review and Award Process:

- Grant proposals will be reviewed by a panel and assigned points based on responses to the questions in the proposal instructions.
- Grant requests will be ranked, and funding recommendations will be made to the State Solid Waste Advisory Council (SWAC) for final approval.
- Grant offers will be made in writing to the applicants.
- All grant awards will have an ending date of June 30, 2025.

Reminders:

- The DHEC grant instrument will specify an award amount for education materials, but approval for individual items will not be made until after the grant has been awarded.
- Specific items and materials must be requested in writing, using the DHEC 2082 approval form.
- Publication, distribution, and production of educational materials may not be initiated until specifically approved by DHEC.

Guidelines

FY2024 Solid Waste Reduction and Recycling Grant Program

- 1. The Office will accept electronic requests starting Monday, February 5, 2024, through 5:00 p.m. (EDT) on Friday, April 5, 2024. Proposals received after the deadline will not be considered. Faxed or incomplete grant proposals will not be considered. If electronic submission presents a problem, please contact the Office for other available options.
- 2. Solid Waste Reduction and Recycling Grants are made available to any local government in the State of South Carolina that provides solid waste services; any region that has submitted to DHEC a regional solid waste management plan; or any eligible local government that applies on behalf of an informal region comprised of eligible local governments, provided they include a signed Memorandum of Agreement between the local governments designating them to administer funds.
- 3. Grants shall not be provided to any local government or region that has not demonstrated a good faith effort to meet the requirements of the S.C. Solid Waste Policy and Management Act of 1991.
- 4. Local governments must have submitted the appropriate reports as required by the S.C. Solid Waste Policy and Management Act of 1991, to include a complete solid waste management plan, an annual solid waste management progress report, and full-cost disclosure documentation.
- 5. Grants will not be provided for projects that are not consistent with the state or local county solid waste management plan.
- 6. Grant proposals will be reviewed and assigned points based on responses to the questions in the proposal instructions. Grant requests will be ranked, and funding recommendations will be made to the SWAC for final approval. Grant offers will be made in writing to the applicants.
- 7. Within thirty (30) days of notification by the SWAC as to the disposition of a party's grant proposal, the party may submit a written request to the SWAC for a review of the original grant decision. Within forty-five (45) days of the original grant decision, the Office will inform the appealing party of the hearing date, place, and time. Within sixty (60) days of the original grant decision, the SWAC shall render a final decision.
- 8. All grant awards will have an ending date of June 30, 2025.
- 9. The applicant must be able to provide documentation of ownership or present a signed lease agreement for any land that may be used in conjunction with the project proposed.
- 10. Activities undertaken to fulfill the requirements of the grant must be performed in compliance with federal, state, and local regulations.
- 11. The Grantee shall not provide any DHEC grant funds to private-sector recycling programs unless specifically contracting for goods or services.
- 12. All grants shall be construed and enforced in accordance with the laws of the State of South Carolina.
- 13. No person shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination in relation to, activities carried out under this grant program on the grounds of race, age, health status, handicap, color, sex, religion, or national origin.
- 14. DHEC reserves the right to offer funding in the grant instrument for goods or services that differ from the description provided in the grant request.
- 15. Pursuant to 2023 Act No. 60, as of July 1, 2024, all contractual rights and obligations of Department of Health and Environmental Control or DHEC will be transferred to the Department of Environmental Services ("Successor Agencies") by operation of law. Grantee's rights and obligations shall continue without change and Grantee shall

perform in accordance with this Grant Application expect as instructed otherwise by the Successor Agencies. All references to the Department of Health and Environmental Control or DHEC in this Grant Application shall be deemed to refer to the Successor Agencies as appropriate without the necessity of an amendment or any other action by the parties. In all other respects, this Application shall remain fully in effect after that time according to its terms unless and until amended.

1. General Recycling Grant Proposal Instructions

Project Goal: To assist local governments and regions in their efforts to achieve the recommended state municipal solid waste (MSW) recycling goal of 50% and achieve the recommended MSW disposal goal of 3.25 lbs. or less per person per day by 2030.

Anticipated Awards: Not to exceed \$15,000 per local government, where funds allocated for outreach/education of this total will not exceed \$5,000.

Expenses Considered: The purchase of equipment, outreach/educational materials, and items necessary to support the project or activity; performance of site preparation; and development and/or implementation of promotional/educational programs to support recycling, waste reduction, and composting in schools, homes, and businesses.

Expenses Not Considered Include: Professional development and recurring expenses (such as permanent personnel costs, equipment repair costs, and indirect costs).

Responses to the items below will be used to assign point values to all proposals. Grant recommendations will be made based on a ranking by point value. **Responses must be numbered 1 through 16 and addressed in numerical order**. Incomplete proposals will not be considered.

General Information

- 1. Provide local government name.
- 2. Provide names, addresses, phone numbers, and email addresses for the project manager, finance director, and authorized representative (i.e. city/county manager or administrator).

Project Description Point Value: 0 to 35

- 3. Describe the overall project for which grant funds are requested.
- 4. Identify the targeted commodity/commodities (e.g., glass, cardboard, electronics) and targeted source(s) of the materials (e.g., residences, schools, businesses, multi-family housing, commercial, institutions, government offices/agencies).
- 5. Is this project in the planning, implementation, or assessment stage?
- 6. Describe how the materials identified are currently being collected, transported, stored, and marketed.
- 7. Describe any changes to how the materials identified will be collected, transported, stored, and marketed upon full implementation of the grant project.
- 8. Detail the potential vendors to whom recyclables will be marketed.
- 9. Describe all outreach/educational activities that will be undertaken to promote the project.

Program Benefit Point Value: 0 to 40

- 10. Describe the amount of targeted material currently being collected from the targeted source.
- 11. Describe the estimated increase or improvement expected as a result of the grant.
- 12. Explain how you arrived at this estimate.

Regionalization Point Value: 0 to 10

- If this is a regional application, please describe all parties and explain the activities for which each party will be responsible.
- 14. If this is a regional application, provide a breakdown by local government of the estimates provided in numbers 10 and 11 above.

Budget/Cost Justification Point Value: 0 to 15

- 15. Provide a detailed budget for the project, including cost estimates for each item for which funding is being requested. Include photos or descriptive literature as available.
- 16. Describe any shortfalls for which grant funding will not be adequate and explain how any additional funding will be secured. Include matching funds, in-kind contributions, and sponsored contributions/grants from other sources.

2. Creativity with Waste Reduction Grant Proposal Instructions

Project Goal: To divert the amount of waste going to the landfill through implementation of a new program or enhancement of an existing program (i.e., recycling, waste prevention, food waste prevention, composting). The office is looking for creative, new ideas that will promote and enhance programs to allow for: more participation in recycling, increases in recovery rates, and reducing contamination. This goal could be accomplished through adding a new commodity or a new collection tool, partnering with local organizations, focusing on educating/creating better recycling access for lesser-reached communities, etc. Try to think outside of the box.

Special consideration will be given to projects whose efforts focus on: Education through creative messaging or by having a neighborhood captain/ambassador, etc.; Multi-family housing; Mini grants for counties/cities to host local businesses for breakfast and to learn about Smart Business; Pilot programs for restaurants' handling food waste; Glass; Batteries; Construction & Demolition. Any education/outreach materials associated with the project must be approved by the Office prior to production.

Expenses Considered: Construction, renovation, or expansion of facilities, equipment, and/or supplies to improve waste reduction programs (i.e., recycling, waste prevention, food waste prevention, composting); education/outreach material to promote and communicate the project to the community; first year of contractor costs.

Expenses Not Considered Include: Professional development and recurring expenses (such as permanent personnel costs, equipment repair costs, and indirect costs).

Anticipated Award: The Office anticipates awarding three to six grants ranging from \$50,000 to \$100,000.

Responses to the items below will be used to assign point values to all proposals. Grant recommendations will be made based on a ranking by point value. **Responses must be numbered 1 through 14 and addressed in numerical order**. Incomplete proposals will not be considered. Provide as much detail as possible.

General Information

- 1. Provide local government name.
- 2. Provide names, addresses, phone numbers, and email addresses for the project manager, finance director, and authorized representative (i.e. county manager or administrator).

Project Description
Point Value: 0 to 50

- 3. Provide a detailed description of the project for which grant funding is requested.
- 4. Describe the specific items for which grant funding is being requested.
- 5. Identify the target audience and describe how the project will be communicated to the target audience (e.g., education/outreach).
- 6. Provide a projected implementation timeline of the project.
- 7. List community partners, if any, which will be involved. Letters of support are welcome.

Project Benefit

Point Value: 0 to 25

- 8. Explain how the project will benefit the community, increase the quantity of recovered organics, and/or otherwise impact the efficiencies of your program.
- 9. Describe how the proposed project makes use of existing infrastructure and complements or improves existing programs.
- 10. Describe how the project will continue beyond the grant.

Regionalization Point Value: 0-10

- 11. If this is a regional application, please describe all parties and explain the activities for which each party will be responsible.
- 12. If this is a regional application, please explain how efficiencies will be achieved through a regional approach.

Budget/Cost Justification Point Value: 0-15

- 13. Provide a detailed budget for the project, including cost estimates for each item for which funding is being requested. Include photos, estimated quotes, and/or descriptive literature as available.
- 14. Describe any shortfalls for which grant funding will not be adequate and explain how any additional funding will be secured. Include matching funds, in-kind contributions, and sponsored contributions/grants from other sources.

ENVIRONMENTAL ADVISORY COMMITTEE CITY OF ISLE OF PALMS, SC

Overview Of Activities for 2023

The activities for 2023 are summarized as follows:

1. Reduction and management of litter and waste

- a. Collaborated with the IOP Clean-up Crew on issues regarding litter.
- Investigated possible collaboration with Palmetto Pride but no grant funding available for additional personnel to enforce litter ordinances, which was our greatest need.
- c. Collaborated with Public Works to develop a plan for emptying the butt cannisters, ordering new cannisters, and modifying existing cannisters to make emptying of cannisters easier.
- d. Renewed contract with Fischer Recycling to continue our glass recycling and added additional bins at the Harris Teeter drop site.
- e. Investigated the possibility of participating in the Fil-a-Bag program but determined that it would not be feasible to add more responsibilities to the Public Works Department for managing the collection sites.

2. Protection of habitat and wildlife

- a. Provided monthly reports of turtle activity during turtle nesting season.
- b. Provided articles to the Island Eye News related to wildlife and habitat.
- c. Collaborated with Sharleen Johnson and Matt Sims to develop a detailed plan for educating residents about native plants and their benefits and to develop a demonstration garden using native plants at Palm and 7th Avenue.
- d. Collaborated with individual to establish a purple martin area near the demonstration garden.
- e. Developed and collaborated with Public Works to install signage related to protection of nesting turtles.
- f. Collaborated with the Audubon Society with regards to education of the public on protection of migratory shore birds

3. Maintenance of water quality

- a. Developed a detailed sampling plan for water quality testing that included the parameter of interest, method of testing, testing site, number of samples and cost.
- b. Introduced the Adopt-A-Drain program.

4. Advocacy and leadership in climate action to build a sustainable environment.

- a. Implemented a composting program with Smart Recycling with bins located adjacent to the Fisher Recycling bins and provided composting workshop
- b. Collaborated with city planners regarding the installation of solar panels on a public buildings.
- c. Identified potential source of grant funding for the purchase and installation of solar panels, with grant submission Jan. 2024.

Projects for 2024

Create an additional site on the city website under **Locals** to house EAC information.



Lawyers for the Wild Side

PO Box 1380, Pawleys Island, SC 29585 | (843) 527-0078 | www.scelp.org

Executive Director & General Counsel
Amy E. Armstrong | amy@scelp.org

Special Counsel

Michael G. Corley | michael@scelp.org

Senior Managing Attorneys

Benjamin D. Cunningham | ben@scelp.org Leslie S. Lenhardt | leslie@scelp.org

Staff Attorneys

Lauren Megill Milton | lauren@scelp.org Emily S. Poole | emily@scelp.org Madison R. Martin | madison@scelp.org

February 10, 2024

Isle of Palms City Council 1207 Palm Boulevard Isle of Palms, SC 29451

Dear Mayor Pounds and Members of Council,

Thank you for the opportunity to provide comment ahead of the Special City Council Workshop scheduled for February 13, 2024. We are directing our comments on behalf of the Coastal Conservation League to the proposed emergency ordinance that would allow for the construction of seawalls and revetments between 100 Ocean Boulevard and 914 Ocean Boulevard on the Isle of Palms.

Seawalls and revetments have well documented negative impacts on our public beaches. These structures are designed and intended to become exposed, and once exposed they lead to loss of sand, causing harm to the public beach and adjacent properties. Though the proposed ordinance attempts to set forth requirements that will safeguard against these impacts, an uncovered erosion control structure will undisputedly exacerbate erosion, both in front of it, as well as the ends of it. The worsening erosion and increased loss of sand that will result from new seawalls built under the proposed ordinance seem contradictory to the City's use of renourishment sand as the primary form of beach preservation, and an expensive resource to maintain.

In the 1980s, the former South Carolina Coastal Council, now known as the Department of Health and Environmental Control's Office of Ocean and Coastal Resource Management (DHEC/OCRM), recognized that our state's beaches were being developed and hard armored in ways that could forever harm the coast. In response, the Coastal Council convened a Blue Ribbon Panel in 1987 to identify long-term solutions to beach erosion issues, while balancing public and private interests. The work of this panel led to the passage of South Carolina's Beachfront Management Act of 1988, S.C. Code Ann. § 48-39-250 *et seq*.

The Act contains key findings, including that "the use of armoring in the form of hard erosion control devices such as seawalls, bulkheads, and rip-rap to protect erosion-threatened structures adjacent to the beach has not proven effective. These armoring devices have given a false sense of security to beachfront property owners. In reality, these hard structures, in many instances, have increased the vulnerability of beachfront property to damage from wind and waves while contributing to the deterioration and

loss of the dry sand beach which is so important to the tourism industry." § 48-39-250(5).

To address this key finding, the BMA also established eight state policies to guide the management of our beaches. One of these policies includes that the state will, "severely restrict the use of hard erosion control devices to armor the beach/dune system and to encourage the replacement of hard erosion control devices with soft technologies as approved by the department which will provide for the protection of the shoreline without long-term adverse effects." § 48-39-260(3).

These findings resulted in state law that has prohibited the construction of new erosion control structures on South Carolina beaches since 1988. In the 36 years since the establishment of this important law, despite the intensifying impacts of climate change, the frequency of renourishment needed to maintain dry sandy beaches, and the costs associated with these projects, this prohibition has remained untouched by lawmakers. Most recently, the South Carolina Beach Preservation Stakeholder Workgroup was convened to identify recommendations as the state implements a policy of beach preservation. The Workgroup's report provided these recommendations and acknowledged that, "the Workgroup agreed that shore-parallel erosion control structures do not support beach preservation."

As South Carolina is a Home Rule state, the City of Isle of Palms also has the authority to enact regulations that help preserve its beach for the benefit of all of its citizens, wildlife, and tourism economy. The City's newly appointed Beach Preservation Ad Hoc Committee will soon begin work to swiftly provide recommendations for more proactive strategies to beach erosion in addition to new, consistent, and sustainable funding mechanisms. The passage of this proposed ordinance would significantly challenge both of the Committee's goals directly in that seawalls and revetments do not support beach preservation and they will exacerbate the need for sand, potentially contributing to increased costs to maintain the beach.

The Army Corps of Engineers will soon begin its beneficial use project that will immediately address the erosional issues along Breach Inlet. It would be prudent to wait for this project to occur and allow the Beach Preservation Ad Hoc Committee to complete its work before rushing to pass an ordinance that could produce unintended consequences for the City's own goals in addressing beachfront issues.

The City of Isle of Palms may be the only local government in South Carolina with such a prohibition on erosion control structures, but it does not mean this is reason to repeal thoughtful policy that protects the beach for all who utilize it. We respectfully urge the City to wait and work with technical experts through its Beach Preservation Ad Hoc Committee before considering any change that would allow the Isle of Palms to become a walled beach.

Very truly yours,

Amy E. Armstrong