

APPENDIX G-5
PUBLIC COMMENTS

Public Comments
St. Johns CSRM Feasibility Study and EA - DRAFT report

#	Commenter	Email	Address	Public comment	Date Received	SAJ Response	Response Date	Action Taken
1	Jim Bonnette	bonnette@aol.com		60-foot berms are only a temporary solution; a large storm could introduce saltwater into the GTMNERR and damage SR A1A; recommends building a jetty on the north side of the St. Augustine Inlet, and possibly a smaller jetty at the north end of South Ponte Vedra Beach. These would cut future maintenance dredging costs. Offered to meet with us to discuss.	2/28/16-3/1/16	The 60-foot berm design was selected because it maximizes net benefits over a 50 year period. The berm will need to be re-nourished every 12 years on average, although the time of re-nourishments may vary depending on the timing of storms and erosion. The design is based on a suite of probable storms that could impact the study area. There is always a residual risk that an unprecedented storm will still cause damages along the coast regardless of the measures implemented. Groins were considered as part of the study, however they were not found to be cost effective in the study area.	08/04/16	no changes made to the report
2	Jack Peter	jpeter@wghof.org	World Golf Hall of Fame & Museum 1 World Golf Place St. Augustine, FL 32092	Does "non-federal" mean that funding outside of the federal government would be the exclusive responsibility of St. Johns County? Or, would the State of Florida be required to supply funding; as State Road A1A is the primary road affected by both the erosion and the beach re-nourishment plan? What entity is ultimately responsible for nonfederal funding?	02/29/16	The non-fed sponsor is ultimately responsible for the non-federal portion. That said, they are typically able to cost share their portion with the State of Florida along shorelines that the state has designated "critically eroded." The shoreline within the TSP area is critically eroded, as determined by the state.	02/29/16	no changes made to the report
3	Thomas McAtee	mcateert@bellsouth.net	1823 Fruit Cove Woods Dr. St Johns, Florida, 32259	Generally opposed to the project as a waste of taxpayer dollars; suggests that a better use of these funds would be to move at-risk infrastructure, enact polices to remove at-risk dwellings at the owner's expense, and prevent future development on beaches.	03/02/16	Non-structural methods, including a moratorium on construction and relocation of structures, were evaluated in the study. Please see the Preliminary Screening Matrix included in Chapter 3 for a summary of all measures considered.	07/18/16	no changes made to the report
4	Karen Shields	karenshields7@gmail.com	2849 Ponte Vedra Blvd. Ponte Vedra, FL	Noticed erosion for the last 5 years, which seems to be tied to the dredging of the St. Augustine Inlet and the disruption of the sand bar that acting as a barrier to protect the shoreline; recently installed a retainer wall; supportive of project.	03/05/16	The latest studies conducted on St. Augustine Inlet, ERDC/CHL-TR-12-14: Reports 1, 2, & 3, indicate that inlet maintenance and dredging of the ebb shoal has not caused increased erosion north of the inlet. This analysis in these studies was eventually adopted by the State in the form of the Inlet Management Plan.	08/04/16	no changes made to the report
5	Dorothy Shelley		1724 Ocean Dunes Terrace Daytona Beach, FL 32118	Has owned property at 9033 Old A1A. Remembers rock placed at Summer Haven in 1963. Was a restaurant and parking lot prior to 1967 in front of her home that were washed away. Feels that sand just washes away, and is not a permanent solution to erosion. Notes that she does not recall any sea turtle nests in front of the rocks. Would prefer that permanent and enhanced rock infrastructure is the best solution.	03/08/16	See page 2-1 of Feasibility Study: "Such structures often protect one property while causing accelerated erosion to adjacent, unarmored properties, while cutting off the vital exchange of sand from dunes to the beach during storm events. By accelerating erosion and cutting off the dunes, the structures also negatively impact habitat of species such as nesting sea turtles." See also the section describing the Beach-FX modeling (Rough Order Costs can be found on pg 3-32).	08/04/16	no changes made to the report

6	Barbara Jenness	barbara@barbarajenness.com	313 Porpoise Point Drive St. Augustine, FL 32084	<p>1) Can you tell me if either of these are in the TSP as there is so much to read to determine the location of the 3 miles of shoreline in South Ponte Vedra and Vilano.</p> <p>2) What are the cost ramifications to the owners?</p> <p>3) What are the timeframes for placement of sand?</p>	03/28/16	<p>1) Provided a map of the two properties in relation to the proposed beach placement area. Both properties are well north of the placement area in the Recommended Plan.</p> <p>2) There are no direct cost ramifications to the property owners related to the project (i.e., property owners within the placement area are not asked individually to cost-share in the project, and USACE is not aware of any additional tax assessments).</p> <p>3) The study is in the feasibility stage. It would need to be approved by USACE and the Assistant Secretary of the Army, and funding would need to be allocated by Congress, before the project could move forward. The base year for initial sand placement used in the report is 2020 (see section 2.4.4 on page 2-54 for more information on this).</p>	03/28/16	no changes made to the report
7	FFWCC			Recognizing that the Summer Haven reach was screened out, commented for awareness that the breached area is now least tern nesting habitat. An FDEP permit issued in 2014 for sand placement on the beach required an ITP from FFWCC for take of these least terns. Any placement in the Summer Haven area would similarly require conditions for the protection of these species.	03/31/16	As the Summer Haven reach was screened out, it is no longer proposed for sand placement.	08/04/16	no changes made to the report
8	John Mark Nolan	jmarknolan@aol.com	Carcaba Road	Long-time resident; concerns about erosion to A1A and recommended beach nourishment as the best alternative compared to relocating A1A.	04/03/16	Noted	08/04/16	
9	John Mark Nolan	jmarknolan@aol.com	Carcaba Road	Concern about ongoing erosion to public beach areas set up at Mussallem Beachfront Park at the end of Carcaba Road, and at North Beach Park. Supports nourishment to protect these public parks.	04/03/16	Noted (unsure if benefits of protecting the wetlands was included in BC Ratio)	08/04/16	
10	Seminole Tribe of Florida	andrewweidman@semtribe.com	30290 Josie Billie Hwy, PMB 1004 Clewiston, FL 33440	No immediate concerns regarding cultural or historic resources. STOF-THPO would like to be consulted prior to project implementation.	04/04/16	Noted	08/04/16	
11	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		Desires federal relief along South Ponte Vedra. Recognizes that they do not meet the requirements for public beach access and parking but argues that the erosion is due to federal projects (St. Aug. Inlet and dredging of shoals). References 1979 Corps study that indicates that 50% of the erosion occurring 5 miles south of the inlet was inlet-induced and that the inlet caused a diversion of sand from both the north and south shorelines.	04/04/16	The latest studies conducted on St. Augustine Inlet, ERDC/CHL-TR-12-14: Reports 1, 2, & 3, indicate that inlet maintenance and dredging of the ebb shoal has not caused increased erosion north of the inlet. This analysis in these studies was eventually adopted by the State in the form of the Inlet Management Plan.	08/04/16	no changes made to the report
12	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		Concern about the designation of the north inlet jetty as a "sand trap groin". The comment states that there is no historical reference that describes the purpose of the north jetty as a sand trap. The jetty is also 75 years old and in poor condition (including leaks).	04/04/16	The 1947 Survey Review Report on St. Augustine Harbor and Vicinity, Florida states "The ocean shore north of the new inlet receded after the channel was cut through. This recession was checked by construction of the sand-trap groin in 1941. The groin impounded sand on its north side from the time of its construction until its impounding capacity was reached in 1943."	08/04/16	no changes made to the report

13	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study does not consider the need and benefits of tightening and lengthening the north jetty. The structure is in poor condition but improving the jetty is not considered in the management alternatives. It is an obvious means by which to retain sand upon the Vilano Beach shoreline.	04/04/16	Groins were considered as part of the study, however they were not found to be cost effective in the study area. Sand tightening and lengthening the sand-trap groin on the north side of the inlet could impound additional sediment along the beach immediately north of the structure. However, the shoreline immediately north of the structure has been historically stable and infrastructure in this area is set back well landward of the beach, making modifications to this groin unlikely to be justified by storm damage reduction benefits that it would provide.	08/04/16	no changes made to the report
14	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study concludes that the shoreline erosion rates are "consistent" between periods of time but that is due to the periods of time that are selected for comparison.	04/04/16	The 'Historical Volume Change' section on page 22 of the Engineering Appendix shows the variability of volume change over time along the length of the study area. It is understood that the rates of volume change are variable over time and that the rates presented are specific to the periods that were analyzed. The modeling of future erosion in the study area is based on the long term average shoreline change across the entire period from 1972 to 2015. Using a long record provides a better estimate of long-term average trends and minimizes fluctuations that can be induced by high frequency storm events over short analysis periods.	08/04/16	no changes made to the report
15	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study does not consider the use of the inlet as a sand source for St. Johns County. The sand that is dredged from the inlet is always placed to the south. The IMP recognizes that one-third of the inlet's impact accrues to the north shoreline but the sand is not placed there.	04/04/16	This study uses the inlet system as a sand source, and will address the erosion observed in the placement area north of the inlet.	08/04/16	no changes made to the report
16	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study does not specify where the sand from the inlet would be dredged from.	04/04/16	The sand source is described in Section 4.2. Material would be obtained from the inlet system, which includes the ebb, flood, and Vilano Point shoals as well as the Federal navigation channel.	08/04/16	no changes made to the report
17	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		A 12-year nourishment interval is "physically improbable" given the severity of the erosion since 2003. The St. Augustine Beach SPP has exhibited a 6-year re-nourishment cycle. Also, bypassing the sand to the north at half the frequency as to the south (12-years vs 6-years) is not in keeping with the principles in the IMP (2/3 - 1/3 rule)	04/04/16	The average re-nourishment interval associated with the TSP is based on the Beach-fx lifecycle modeling. It is understood that this interval could vary significantly depending on the timing of erosion and storm events. The selection of the TSP was based on maximizing net storm damage reduction benefits. Section 3.10.1 of the main report describes how the TSP volume requirements are consistent with the IMP. The TSP was formulated using the latest economic model which was different from that used for St. Augustine Beach. The site conditions of the TSP in Vilano, a relatively straight shoreline, differ from the protruding headland in St. Augustine, which also factors into the planned average nourishment interval.	07/19/16	no changes made to the report

18	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The study's cost analysis does not clarify if costs of dredge mobilization etc are shared with St. Johns County SPP. What cost efficiencies are gained to both the Vilano Beach and St. Augustine Beach projects if both share the same contract and dredge an offshore borrow source?	04/04/16	Costs of dredge mobilization are not shared with the St. Johns County SPP. Since these projects are not authorized together, USACE cannot guarantee that they would receive funding at the same time thereby capturing the cost savings. However, a rough value added is presented in Chapter 5, Recommendations, if they could be constructed together.	08/16/16	Revisions made to Chapter 5, Recommendations
19	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		Would the overall total and federal costs be reduced if use of an offshore borrow area reduced the erosion from both project segments, and if occasional dredging of the navigation channel by small dredge, or by small hopper and nearshore disposal was undertaken to supplement renourishment of both projects?	04/04/16	we considered initial dredging with the offshore borrow area followed by periodic nourishment from the ebb shoal/inlet for both segments (South Ponte Vedra and Vilano) for several sizes of nourishments. These options were not less costly than using the ebb shoal/inlet as the sole borrow area. We did not model nearshore placement.	08/16/16	no changes made to the report
20	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		It appears there are numerous opportunities for Regional Sand Management that have not been considered in the study. It is not clear why RSM principles are not included within alternatives considered in the study.	04/04/16	The use of the inlet system as a sand source for the Recommended Plan is a method of implementing Regional Sediment Management (RSM). RSM promotes using sediment already in the system, rather than obtain sediment from outside of the sediment system.	08/04/16	no changes made to the report
21	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		SPVVB is concerned that the proposed project does not address the erosion problems along South Ponte Vedra and that the federal cost share is modest along Vilano Beach due to public beach access and parking. We note that the potential federal (and State) cost-share could be increased by providing some public beach parking at the public street-ends which qualify as public access but otherwise provide no cost-share benefit due to lack of parking.	04/04/16	Concur.	08/04/16	no changes made to the report
22	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		SPVVB is mostly concerned that the proposed project seeks to address beach erosion north of the inlet by continuing the inlet dredging practices that are largely responsible for causing the erosion in the first place. The SPVVB believes that dredging the inlet shoals as a sand source (beyond maintaining the navigation channel) is contributing to the erosion of the adjacent shores.	04/04/16	The latest studies conducted on St. Augustine Inlet, ERDC/CHL-TR-12-14: Reports 1, 2, & 3, indicate that inlet maintenance and dredging of the ebb shoal has not caused increased erosion north of the inlet. This analysis in these studies was eventually adopted by the State in the form of the Inlet Management Plan.	07/19/16	no changes made to the report
23	South Ponte Vedra - Vilano Beach Preservation Association, Inc. (SPVVB)	tturnage@turnageco.com		The IMP is not a directive to use the inlet as a sediment source. Instead it specifies maximum limits for dredging and describes the requisite distribution to the adjacent shores of sand that is ultimately dredged from the inlet, including for purposes of navigation. The IMP also requires investigation of alternate sand sources and north jetty improvements. If the project using offshore sand is not economically favorable by federal standards, then this cannot serve as the justification to use inlet sand that may ultimately lead to further shoreline damage or an endless cycle of costly dredging and renourishment.	04/04/16	The effects of the Future Without-Project Conditions are included in the study in Section 2. As the project at St. Augustine Beach is already authorized, the Future Without-Project Conditions include the use of the inlet system as a sand source for that project.	08/04/16	no changes made to the report

Hershorin, Aubree SAJ

From: Jim Bonnette <bonnette@aol.com>
Sent: Sunday, February 28, 2016 12:32 PM
To: Hershorin, Aubree SAJ
Cc: Jim Bonnette
Subject: [EXTERNAL] South Ponte Vedra Beach/Vilano Beach Florida beach erosion.

Hi Aubree:

I want to comment on the beach erosion. I live on the opposite side of State road A1A in South Ponte Vedra Beach for 17 years. I overlook Guana State preserve and will actually gain from any erosion or water level increase for kayaking, etc. But this does not change my opinion. I care about the people and the long term cost for the Corps. I come from an engineering family and currently have a brother lawyer/engineer in the EPA.

First, we both agree that there is massive erosion in this area. Within ten years homes will fall into the ocean. When you see it for 17 years you get good info. And with a few hurricanes this could be much sooner as you know.

Second, why is this happening. The dredging of the St. Augustine inlet for years has caused the sand to move south away from the affected area. And this will continue. But what we all worry about is how fast with storms. And how do we stop it.

Third, the suggestion of adding 60 foot berms will only be temporary solution. I will get into that later. But with the Corps as you know a solution could take years to start.

Fourth, something only a few people are thinking about. A new storm now could break through to State Road A1A and Salt water would enter into one of Americans best preserves. The EPA can tell you a lot about this Guana preserve that could be ruined. Massive oyster and animal life would be lost forever. The cost to repair this State road and damage would be in the billions as you know with maintenance if storms hit.

Fifth. My solution. Here is come and don't fall off your seat. I have changed a lot of what is done in the US in other areas.

1. Yes we need to fill in the erosion areas. That is simple. 2. But where does all that fill go over years? Into the St Augustine inlet and the Corps then digs that out. 3. We must have a long term solution. To keep the fill and stop the movement of the sand into the St Augustine inlet.

A. A large stone jetty must be built before the St Augustine inlet to hold the fill from moving into the inlet. This was done for the US Navy base Mayport just north of us and many other areas throughout the US. Another smaller jetty my be needed just at the north end of South Ponte Vedra Beach.

B. Land fill in the hundreds of tons must be only filled in after the Jetty is complete.

Aubree, this may at first sound expensive, but it will be a lot less expensive if we do nothing.

Best regards.

Jim Bonnette

145 Yellow Bill Lane

South Ponte Vedra Beach, Florida 32082

Bonnette@aol.com

904-808-8475

Sent from my iPad

From: [Hershorin, Aubree SAJ](#)
To: [Jack Peter](#)
Cc: [Burch, Brandon S SAJ](#); [Schrader, Matthew H SAJ](#)
Subject: RE: [EXTERNAL] St. Johns County Shoreline Erosion (UNCLASSIFIED)
Date: Monday, February 29, 2016 4:39:13 PM

CLASSIFICATION: UNCLASSIFIED

Jack,

The non-fed sponsor is ultimately responsible for the non-federal portion. That said, they are typically able to cost share their portion with the State of Florida along shorelines that the state has designated "critically eroded." The shoreline within the TSP area is critically eroded, as determined by the state.

If you have any further questions, please don't hesitate to contact me.

Best,
Aubree

~~~~~  
Aubree Hershorin, Ph.D.  
Environmental Branch, Coastal Section  
Planning and Policy Division  
U.S. Army Corps of Engineers  
701 San Marco Blvd.  
Jacksonville, FL 32207  
Office: (904) 232-2136

-----Original Message-----  
From: Jack Peter [<mailto:jpeter@wghof.org>]  
Sent: Saturday, February 27, 2016 1:53 PM  
To: Hershorin, Aubree SAJ <[Aubree.G.Hershorin@usace.army.mil](mailto:Aubree.G.Hershorin@usace.army.mil)>  
Subject: [EXTERNAL] St. Johns County Shoreline Erosion

Aubree,

I've read the draft study on the plan to protect portions of St. Johns County shoreline and have a question.

The plan states, "Cost sharing for initial construction is 22 percent federal and 78 percent non-federal. The cost sharing for periodic nourishments is 17.7 percent federal and 82.3 percent non-federal."

Does "non-federal" mean that funding outside of the federal government would be the exclusive responsibility of St. Johns County? Or, would the State of Florida be required to supply funding; as State Road A1A is the primary road affected by both the erosion and the beach re-nourishment plan? What entity is ultimately responsible for non-federal funding?

Thank you in advance for your help.

Jack

Jack Peter, Chairman, St. Johns County Tourism Development Council

Jack Peter  
President

World Golf Hall of Fame & Museum  
1 World Golf Place  
St. Augustine, FL 32092  
904-940-4029 O.  
904-612-7877 C.  
Blockedwww.worldgolfhalloffame.org  
jpeter@wghof.org

CLASSIFICATION: UNCLASSIFIED

**From:** [bonnette@aol.com](mailto:bonnette@aol.com)  
**To:** [Hershorin, Aubree SAJ](mailto:Hershorin, Aubree SAJ)  
**Subject:** Re: [EXTERNAL] South Ponte Vedra Beach/Vilano Beach Florida beach erosion. (UNCLASSIFIED)  
**Date:** Tuesday, March 01, 2016 4:41:30 PM

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Thanks Aubree; the only thing I would like to add to the below is this Jetty would cut a lot of the future channel dredging for the Corps and cut future cost.

I do know of other ideas like natural reefs off the coast that could help. All of you are welcome to meet at my home to discuss any time. I travel around the world at least ten times per year so would need a good notice. All I want is it to be done right.

Best regards.

Jim B

Bonnette@aol.com

Sent from my iPhone

> On Feb 29, 2016, at 4:41 PM, Hershorin, Aubree SAJ <[Aubree.G.Hershorin@usace.army.mil](mailto:Aubree.G.Hershorin@usace.army.mil)> wrote:

>

> CLASSIFICATION: UNCLASSIFIED

>

> Mr. Bonnette,

>

> Thank you for your comments. They will be included in the record and addressed in the final report.

>

> If you have any further questions/comments, please do not hesitate to contact me.

>

> Best,

> Aubree

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> ~~~~~

> Aubree Hershorin, Ph.D.

> Environmental Branch, Coastal Section

> Planning and Policy Division

> U.S. Army Corps of Engineers

> 701 San Marco Blvd.

> Jacksonville, FL 32207

> Office: (904) 232-2136

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> -----Original Message-----

> From: Jim Bonnette [<mailto:bonnette@aol.com>]

> Sent: Sunday, February 28, 2016 12:32 PM

> To: Hershorin, Aubree SAJ <[Aubree.G.Hershorin@usace.army.mil](mailto:Aubree.G.Hershorin@usace.army.mil)>

> Cc: Jim Bonnette <[bonnette@aol.com](mailto:bonnette@aol.com)>

> Subject: [EXTERNAL] South Ponte Vedra Beach/Vilano Beach Florida beach erosion.

>

> Hi Aubree:

>

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> First, we both agree that there is massive erosion in this area. Within ten years homes will fall into the ocean.

> When you see it for 17 years you get good info. And with a few hurricanes this could be much sooner as you know.

> Second, why is this happening. The dredging of the St. Augustine inlet for years has caused the sand to move south away from the affected area. And this will continue. But what we all worry about is how fast with storms. And how do we stop it.

> Third, the suggestion of adding 60 foot berms will only be temporary solution. I will get into that later. But with the Corps as you know a solution could take years to start.

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> A. A large stone jetty must be built before the St Augustine inlet to hold the fill from moving into the inlet. This was done for the US Navy base Mayport just north of us and many other areas throughout the US. Another smaller jetty my be needed just at the north end of South Ponte Vedra Beach.

> B. Land fill in the hundreds of tons must be only filled in after the Jetty is complete.

> Aubree, this may at first sound expensive, but it will be a lot less expensive if we do nothing.

>

> Best regards.

> Jim Bonnette

> 145 Yellow Bill Lane

> South Ponte Vedra Beach, Florida 32082

> Bonnette@aol.com

> 904-808-8475

>

> Sent from my iPad

> CLASSIFICATION: UNCLASSIFIED

>

**From:** [Thomas McAteer](#)  
**To:** [Hershorin, Aubree SAJ](#)  
**Subject:** [EXTERNAL] St John's County Shoreline Project Concerns  
**Date:** Wednesday, March 02, 2016 11:30:06 AM

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To the Corps of Engineering,

As a long time resident of St John's County (33 years) I am opposed to spending any County, State or federal money on nourishing the beaches of this county or in this state. It is pure fact and part of nature the shorelines and beaches shift and change by normal tides, wind and weather. It is both fruitless and irresponsible to spend any more time or money thinking we can change this.

The homeowners who built so close to the ocean knew the risks of doing so. It should not be the rest of the states' responsibility to fix their problems of an eroding beach front. If your abode is at risk, it should be condemned and the state should help them remove the dwelling and restore that portion of the beach to natural settings. We SHOULD NOT spend our tax money dredging, building walls or anything else to put sand back where nature has moved it.

As far as the infrastructure is concerned, move it. Relocate the roads (A1A) more inland away from the encroachment of the ocean. Use the money allotted for nourishing beach front homes toward moving the infrastructure. Do the studies on longer term erosion to determine which infrastructure locations are at risk and where it is the best place to relocate it for the near and long term. Put a multi-year plan in place that will relocate at-risk infrastructure, monitor the erosion progression, and continue this cycle spending tax money to keep the state/county safe.

Spending any more money on trying to correct or prevent beach erosion is the same as building sand castles on the beach. Looks nice for a while but it won't be very long before you have to do it again. Stop allowing building on the beaches. Enact building codes and policy that will remove dwellings at risk from erosion at the owners expense.

I am opposed to any beach nourishment project from the study ([Blockedwww.saj.usace.army.mil/Missions/CivilWorks/ShoreProtection/StJOhns.aspx](#)). It is almost laughable to even call it a "ShoreProtection" project. The only thing this project needs to "protect" is the state/count infrastructure currently at risk of the public safety. This should be a short term solution with the long term goal of relocation to safer locations from erosion. Homeowners on the beach should be told they can not build, erect or change the shorelines in any way. If there abode is at risk, be prepared for it to be condemned and for the shoreline to be restored to it's natural setting.

Sincerely,  
Mr. Thomas J McAteer  
1823 Fruit Cove Woods Dr.  
St Johns, Florida, 32259

**From:** [Karen Shields](#)  
**To:** [Hershorin, Aubree SAJ](#)  
**Subject:** [EXTERNAL] Erosion South Ponte Vedra Beach  
**Date:** Saturday, March 05, 2016 8:47:54 AM

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Hello

We are homeowners at 2849 Ponte Vedra Blvd Ponte Vedra Fl ,, we had experienced severe erosion for about the last 5 years and had to put up a retainer wall.

The erosion is moving south , but it seems to be tied to the dredging of the inlet and the disruption of the natural sand bar that use to act as a barrier to protect the shoreline.

We had a thick vegetated dune and now we have a sparse dune ,, its so sad to see.

I hope the Army Corp can do something to stop and prevent this ,,,,

The negative impact of this dredging really needs to be reassessed and some type of re nourishment needs to be in place for help !

Regards  
Karen Shields  
904 343 0089

Dorothy D. Shelley  
9033 Old A1A  
Summer Haven, Florida 32080

March 8, 2016

Aubree Hershorin, Ph.D  
U.S. Army Corps of Engineers  
Jacksonville District  
Planning and Policy Division, Environmental Branch  
PO Box 4970  
Jacksonville, FL 32232-0019

Dear Doctor Hershorin:

My name is Dorothy Shelley, and I have lived at Summer Haven located at Matanzas Inlet since 1963. Over the years, I've seen many changes. The oceanfront rocks at the south end of Summer Haven were installed in 1963. This process involved initial excavation and then a layer of small pea rock was placed underneath before placing layers of larger rock. These are the ones that show more than the others at the north end where I live.

My home is at 9033 Old A1A. In front of my house, there used to be a restaurant and parking lot which were washed away. This was before 1967 when I built my house. Several years ago, they pumped sand over from the Intracoastal Waterway and other areas in a beach renourishment project. This sand lasted one season, and then the current washed it into the inlet or some other unexpected location.

As far as the turtles, I haven't seen a turtle nest on the beach in front of the rocks for a long time. Fortunately, we had high numbers of turtle nests all along the Florida coast this year. In front of these rocks, however, it is not a desirable location for nesting turtles. Over time, these heavy rocks have recessed into the sand and I believe have formed a good solid foundation for enhancements. When we have our next storm, I hope the water doesn't come over the rocks and wash away the road. I respectfully request that you do not use sand or other loose material alone to correct the situation. As we have learned, it just doesn't stay, but rather fills up the inlet.

I hope these thoughts will help in your decision-making process. Please use the history of sand movement in the Matanzas Inlet as a guide. Permanent and enhanced rock infrastructure is the only thing that will stand the test of time.

Sincerely,



Dorothy D. Shelley

PS: As I was driving by Marineland the other day, I noticed rocks have recently been added to enhance the durability of the shoreline. Please also consider this. In addition, should you need to contact me, **my mailing address is: 1724 Ocean Dunes Terrace, Daytona Beach, FL 32118.**

**From:** [Barbara Jenness](#)  
**To:** [Hershorin, Aubree SAJ](#)  
**Subject:** RE: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project  
**Date:** Monday, March 28, 2016 2:45:37 PM

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Thank you for your prompt responses!

<Blockedhttp://BarbaraJenness.com>  
Barbara Jenness <Blockedhttp://BarbaraJenness.com> - Licensed Real Estate Broker  
ABR, CDPE, CRS, e-PRO, GRI, PMN, TRC  
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St. Augustine, FL 32084

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Website: [Blockedhttp://BarbaraJenness.com](#)  
HousingTrends Newsletter <[Blockedhttp://BarbaraJenness.housingtrendsnewsletter.com](#)>  
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<[Blockedhttp://linkedin.com/in/BarbaraJenness](#)> <[Blockedhttp://www.twitter.com/BarbaraJenness](#)>

----- Original Message -----

From: Aubree.G.Hershorin@usace.army.mil <<mailto:Aubree.G.Hershorin@usace.army.mil>>  
To: Barbara@BarbaraJenness.com <<mailto:Barbara@BarbaraJenness.com>>  
CC: Brandon.S.Burch@usace.army.mil;  
Sent: 3/28/2016 2:13:00 PM  
Subject: RE: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project

The full template would be from approximately 3200 S. Ponte Vedra Blvd. to 3280 Coastal Hwy. There are 1000 foot tapers at either end, which extend from approximately 3175 S. Ponte Vedra Blvd. to 3216 Coastal Hwy.

From looking at Google Earth, it seems like the full template stops at the southern end of the Serenata Beach Club, and the taper extends north to about where the pool is located.

-----Original Message-----

From: Barbara Jenness [<mailto:barbara@barbarajenness.com>]  
Sent: Monday, March 28, 2016 1:32 PM  
To: Hershorin, Aubree SAJ <[Aubree.G.Hershorin@usace.army.mil](mailto:Aubree.G.Hershorin@usace.army.mil)>  
Subject: RE: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project

Thank you! Do you have the approximate street numbers for the north and south end of the TSP? Trying to see if Serenata is in the TSP.

<Blockedhttp://BarbaraJenness.com> <Blockedhttp://BarbaraJenness.com >>

Barbara Jenness <Blockedhttp://BarbaraJenness.com> - Licensed Real Estate Broker  
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<Blockedhttp://www.facebook.com/pages/Barbara-B-Jenness-PA/193566380680967 >>

----- Original Message -----

From: Aubree.G.Hershorin@usace.army.mil <<mailto:Aubree.G.Hershorin@usace.army.mil>>  
To: barbara@barbarajenness.com <<mailto:barbara@barbarajenness.com>>  
CC: Brandon.S.Burch@usace.army.mil;  
Sent: 3/28/2016 12:06:00 PM  
Subject: RE: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project

Ms. Jenness,

Thank you for letting me know about the misdirected link. Appendix G1 is attached for your reference. We will hopefully be able to correct the link in the next few days.

In response to your questions:

- 1) I've attached a map of the two properties you reference in relation to the proposed beach placement area (shown in green). Both properties are well north of the TSP.
- 2) If I'm understanding your second question correctly, there are no direct cost ramifications to the property owners related to the project (i.e., property owners within the TSP location are not asked individually to cost-share in the project, and I am not aware of any additional tax assessments).
- 3) The study is in the feasibility stage. It would need to be approved by USACE and the Assistant Secretary of the Army, and funding would need to be allocated by Congress, before the project could move forward. The base year for initial sand placement used in the report is 2020 (see section 2.4.4 on page 2-54 for more information on this).

I hope that answers your questions. If you have any further questions, please don't hesitate to contact me.

Very respectfully,  
Aubree

~~~~~  
Aubree Hershorin, Ph.D.
Environmental Branch, Coastal Section
Planning and Policy Division

U.S. Army Corps of Engineers
701 San Marco Blvd.
Jacksonville, FL 32207
Office: (904) 232-2136

-----Original Message-----

From: Barbara Jenness [<mailto:barbara@barbarajenness.com>]
Sent: Monday, March 28, 2016 9:28 AM
To: Hershoin, Aubree SAJ <Aubree.G.Hershoin@usace.army.mil>
Subject: [EXTERNAL] St. Johns County Coastal Storm Risk Management Project

I received a letter from you and went to the link. I am unable to download Appendix G1---it brings up Appendix F. Please let me know when this is corrected.

I own 2729 S. Ponte Vedra Blvd (vacant lot) and have 2423 S. Ponte Vedra Blvd (vacant lot) listed for sale.
1) Can you tell me if either of these are in the TSP as there is so much to read to determine the location of the 3 miles of shoreline in South Ponte Vedra and Vilano.
2) What are the cost ramifications to the owners?
3) What are the timeframes for placement of sand?
If you can point me to the specific places this is shown in your study I would appreciate it.
Thanks!

Barbara B. Jenness, P.A. <BlockedBlockedhttp://BarbaraJenness.com> <Blockedhttp://BarbaraJenness.com >>
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St. Augustine, FL 32084

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e-mail: Barbara@BarbaraJenness.com <<mailto:Barbara@BarbaraJenness.com>>
Website: BarbaraJenness.com <BlockedBlockedhttp://BarbaraJenness.com> <Blockedhttp://BarbaraJenness.com >>
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From: [Mark](#)
To: [Hershorin, Aubree SAJ](#)
Subject: [EXTERNAL] In favor Comment on Vilano Beach Renourishment plan.
Date: Sunday, April 03, 2016 2:45:41 PM

I am a resident of St. Johns County and I have owned property for almost forty years on Carcaba Road which is near the center of the proposed Vilano Beach Renourishment. I have witnessed firsthand the erosion of the seashore towards A1A over those decades. There is some urgency in undertaking this project because it is not a matter of whether the erosion will reach A1A, but how soon. At this time, a large storm probably would compromise about a half mile stretch of current A1A. It is therefore economical and sensible to pursue beach renourishment as a cheaper alternative to rebuilding or relocating the A1A highway. Relocation of A1A to the west in that area would also compromise a fragile coastal wetland environment that the State of Florida, St. Johns County and the Federal Government have sought for decades to preserve.

There is also a great public interest to be served, because of the beach areas that have been set aside for public access and recreation at Mussallem Beachfront Park, at the end of Carcaba Road, and at North Beach Park. Renourishment will preserve and protect these beaches for public use, so once again it makes economic sense to preserve these non-private public beaches, rather than have them continually degrade due to erosion.

I see a lot of positives for implementing the proposed Vilano Beach Renourishment Plan. For the sake of brevity in my remarks I have only focused on the economic sensibility of protecting A1A and the public's access to beaches.

Thank you,
John Mark Nolan



April 4, 2016

U.S. Army Corps of Engineers, Jacksonville District
Planning and Policy Division, Environmental Branch
Attn: Aubree Hershorin, Ph.D.
P.O. Box 4970
Jacksonville, FL 32232-0019
Aubree.G.Hershorin@usace.army.mil

RE: St. Johns County FL – South Ponte Vedra Beach, Vilano Beach, and Summer Haven Beaches.
Coastal Storm Risk Management Project.
Draft Integrated Feasibility Study and Environmental Assessment. February 2016.

Dear Dr. Hershorin:

The following comments are provided on behalf of the South Ponte Vedra – Vilano Beach Preservation Association, Inc. (SPVVB) in regard to the above-referenced Study, and with particular regard to the South Ponte Vedra and Vilano Beach shoreline segments. SPVVB is an association of property owners with homes, lands, and related interests along the St. Johns County shoreline north of St. Augustine Inlet, within the Study area. This shoreline has suffered significant, unprecedented beach erosion beginning about 12 years ago – resulting in substantial property damage, land loss, and resultant coastal armoring.

The Tentatively Selected Plan (TSP) addresses Vilano Beach but provides no federal project recommendation or relief along South Ponte Vedra. We recognize that this finding reflects federal requirements for public beach access and parking. However, this finding fails to recognize that the beach erosion is due, in significant part to prior federal projects; i.e., the relocation of St. Augustine Inlet in 1940 to its present location, the resultant inherent formation of inlet shoals that diverted sand from both inlet-adjacent shorelines, and the over-dredging of the inlet shoals to nourish the St. Johns County (St. Augustine Beach) federal shore protection project since 2003. The Corps' 1979 study concluded that 50% of the erosion occurring 5 miles south of the relocated inlet was inlet-induced. A comparable finding appears relevant to the north shoreline. The formation of the extensive shoals in the new inlet, after 1940, clearly came from the diversion of sand from both adjacent shorelines, without respect to public beach parking.

The Study describes the greatest density of property value and predicted damages are from about R95 to R102. This is immediately north of and excluded from the proposed project limits, presumably owing to public beach access and parking considerations.

The Study repeatedly refers to the inlet's north jetty as a "sand trap groin". We are unaware of any historical reference that describes the north jetty as such. To our knowledge, the north jetty was never intended as a weir-groin, and the inlet was never designed to feature a sand trap nor regular

bypassing there from. It seems unlikely that the north jetty was “designed” to allow sand to deposit in the inlet and create what is now the anthropogenic landform of Porpoise Point. Instead, the north jetty is/was a simple terminal structure, now over 75 years old, derelict, and leaky. If it were to act as a “sand trap groin” then the sand which it leaks would need to be returned to the north shoreline. It seems to make little physical or economic sense to allow sand to pass into the inlet from the north shoreline -- through a “sand trap groin” -- only so that it can be dredged and placed back to the north shoreline from which the sand came.

The Study does not consider the need for -- and the physical, economic and environmental benefit of -- sand-tightening and lengthening the St. Augustine Inlet north jetty. Fundamental observation from the beach and aerial photographs indicate that the structure is almost wholly transparent: increasing both shoreline erosion of Vilano Beach and the shoaling of the navigation channel. Improvement to the north jetty is never listed in the considered management alternatives nor considered in the Study; but it is described in the Inlet Management Plan as an alternative to be studied. It is an obvious means by which to retain sand upon the Vilano Beach shoreline that is otherwise lost to the inlet and Porpoise Point and shoals the navigation channel -- thereby potentially reducing renourishment requirements of the updrift shoreline, reducing maintenance dredging requirements, and reducing overall project costs.

The Study concludes that the shoreline erosion rates are “consistent” between periods of time, but that is largely a function of the periods of time that are selected for comparison. In contrast, it is evident that shoreline erosion became problematic along South Ponte Vedra and Vilano Beach after 2003, when large-scale dredging of the inlet ebb shoal began; and erosion appears to peak after inlet dredging events.

The Study does not consider that the use of the inlet as a sand source for the St. Johns County (St. Augustine Beach) federal shore protection project is a potential, principal cause of the beach erosion along South Ponte Vedra and Vilano Beach. To wit, the Corps has dredged St. Augustine Inlet three times in one decade and placed the sand to the south beach for that project: in January 2003 (4.2 mcy), September 2005 (2.8 mcy), and August 2012 (2.2 mcy). That is a total of 9.2 mcy of sand removed from the inlet and placed to the south. Since 2003, and projected to 2017, that equates to 657,100 cubic yards per year. Assuming a 5-year life, the last dredging in August 2012 equates to 440,000 cubic yards per year. Those dredging volumes grossly exceed the IMP’s *total* estimated sink effect and bypassing quantities (278,100 cy/yr) by a factor of 2.4 and 1.6, respectively. All of that sand removed from the inlet was placed to the south, and none to the north. Noting that the IMP recognizes that one-third of the inlet’s impact accrues to the north shoreline, it is little wonder that the SPVVB beaches -- north of the inlet -- have exhibited extraordinary increases in beach erosion since 2003 and a consequent proliferation of shoreline armoring.

The Study does not specifically describe where the sand from the inlet would be dredged for purposes of constructing the Vilano Beach project. And, the Study does not include the results of the contemporary monitoring data that are to describe how the inlet (and its borrow areas) have responded to the prior dredging, particularly since the 2012 dredging event.

A 12-year renourishment interval, described for the TSP, appears physically improbable given the severity of the observed erosion since 2003 and the fact that the St. Augustine Beach shore protection project has exhibited a 6-year renourishment requirement. Further, bypassing sand to the north at half the frequency as to the south (i.e., 12-years versus 6-years) is not in keeping with the principles of the Inlet Management Plan. It would ostensibly allow a sand deficit to accrue along the north shoreline at twice the duration as along the south shoreline.

The Study’s cost analysis does not clarify if costs of dredge mobilization etc. are shared with the St. Johns County (St. Augustine Beach) shore protection project. What cost efficiencies are gained to

both the Vilano Beach and St. Augustine Beach projects if both share the same contract and dredge, and/or an offshore borrow source? Would the overall total and federal costs be reduced, particularly if use of an offshore borrow area (in lieu of an inlet borrow area) reduced the erosion from both project segments – and if occasional dredging of the navigation channel by small dredge, or by small hopper & nearshore disposal was undertaken to supplement renourishment of both projects? It appears that there are numerous opportunities for Regional Sand Management (RSM) that have not been considered in the Study. It is not clear why RSM principles are not included within the alternatives considered in the Study.

SPVVB is concerned that the proposed project does not address the erosion problems along South Ponte Vedra and that the federal cost share is modest (22% for initial construction and 17% for renourishments) along Vilano Beach, principally because of public beach access and/or parking. We note that the potential federal (and State) cost-share could be increased by providing some public beach parking at the public street-ends which qualify as public access but otherwise provide no cost-share benefit due lack of parking (though we recognize that this is not within the scope of federal actions).

Overall, SPVVB is mostly concerned that the proposed project seeks to address beach erosion north of the inlet by continuing the inlet dredging practices that are largely responsible for causing the erosion in the first place. We believe that continued use (dredging) of the inlet shoals as a sand source – beyond that fundamentally necessary to maintain the navigation channel – is substantially contributing to the erosion of the adjacent shores. It therefore appears to make little physical sense to address a problem by exacerbating its root cause; i.e., by continuing to dredge the inlet beyond the navigation requirements.

The Inlet Management Plan is not, or should not be, a directive to use the inlet as a sediment source. Instead, it specifies maximum limits for dredging and describes the requisite distribution to the adjacent shores of sand that is ultimately dredged from the inlet; i.e., including for purposes of navigation. The IMP also requires investigation of (i) alternate sand sources and (ii) north jetty improvements. Both features would benefit the Study area shoreline. If a project using offshore sand is not economically favorable by federal standards, then this cannot serve as the justification to use inlet sand that may ultimately lead to further shoreline damage or an endless cycle of costly dredging and renourishment. Offshore sand sources of at least 30 million cubic yards (developed) are available, as described in the Study. The ultimate, overall least cost solution is to simply stop using the inlet as a sand source; viz., to reduce the influx of sand past the north jetty and to stop dredging the inlet beyond that which is necessary for maintenance of the navigation channel.

Please do not hesitate to contact me at tturnage@turnageco.com if you have any questions regarding these observations, and thank you for the opportunity to offer these comments.

Sincerely,



Tom Turnage
South Ponte Vedra-Vilano Beach Preservation Assn., Inc.



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
441 G STREET, NW
WASHINGTON, DC 20314-1000

DEC 01 2016

The Honorable Marco Rubio
United States Senate
201 S. Orange Avenue, Suite 350
Orlando, Florida 32801

Dear Senator Rubio:

This is in response to your letter, dated October 31, 2016, relaying concerns of your constituents, Mr. and Mrs. Guy Rasch of Ponte Vedra Beach, St. John's County, Florida. Mr. and Mrs. Rasch expressed concern about the impact of Hurricane Matthew on the northeast coast of Florida in the South Ponte Vedra beach area.

The Jacksonville District of the U.S. Army Corps of Engineers is currently conducting the St. Johns County Coastal Storm Risk Management feasibility study. The study is examining the feasibility of providing a project to address erosion problems and reduce the potential storm damage susceptibility of structures along the Atlantic Coast shoreline in St. Johns County.

The tentatively selected plan for this project includes beach and dune nourishment within the Vilano Beach reach and a small portion of the South Ponte Vedra Beach reach. The design includes construction of a 60-foot equilibrated berm extension along 2.6 miles of shoreline. The project template will also include a dune feature varying in height between 14 and 20 feet, reflecting the average dune position from the year 2015. One thousand foot tapers will extend from the northern and southern ends of the berm extension, connecting the extension to the existing shoreline. The addition of tapers results in sand placement along three miles of shoreline. The tentatively selected plan does not include armoring.

The feasibility study is currently scheduled to be completed and a Chief of Engineers Report signed in May 2017. Once the Corps completes the report, funding will be needed to design the project and Congress will need to authorize construction of the project. Funds to design and construct the recommended plan are subject to future congressional appropriations.

I hope this response has adequately addressed your concerns and questions related to this matter. If you have additional questions, please contact me or a member of your staff may contact Ms. Stacey Brown, Deputy Chief, South Atlantic Division Regional Integration Team, at (202) 761-4106.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Dalton".

James C. Dalton, P.E.
Director of Civil Works