

**Wadmalaw Island Land Planning Committee**  
[www.WILPC.org](http://www.WILPC.org)

August 5, 2021

Sarah Reed  
OCRM Project Manager  
Via Email and Website Portal Upload  
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<https://epermweb.dhec.sc.gov/ncore/external/publicnotice/info/-4606121589327701387/comments>

**RE: Point Farm Critical Area Permit Application: HP9-AGJB-XK14Y**

Dear Ms. Reed:

The Wadmalaw Island Land Planning Committee is made up of a diverse group of residents throughout Wadmalaw Island. We were organized in 1988 at the request of Charleston County Council, after they adopted the Wadmalaw Land Plan, and have served as an advisory committee on the Island since that time. Our committee advocates for the protection of our island in many ways, particularly related to land use and environmental activities that are proposed from time to time through various county, state, and federal agency notices and permit processes.

We were recently told about this Critical Area Permit Application and have researched the associated documents that were available online and through a FOIA request. We are sending this to you to voice some concerns that we have, and to ask OCRM to hold a public hearing regarding this Critical Area permit application. We would like for our residents to have the opportunity ask questions and to have their concerns expressed and addressed.

We understand that the Critical Permit application under your review is different from the Corps of Engineers' provisional Mitigation Bank permit, and that the proposed project under your review is to "enhance and restore" tidal salt marsh on the subject 2026.64 acre tracts, adjacent to the Leadenwah Creek. After looking through the available documents and considering the related SCDHEC Regulations, we are worried that this project, if approved, will permanently alter a healthy wetlands ecosystem and cause tremendous impacts on such a valuable public resource.

A specific concern to us is that this proposal includes a number of acres of jurisdictional fresh to brackish water impoundments, emergent freshwater, and forested freshwater, all valuable freshwater habitat. We believe that the conversion of these freshwater wetlands to saltwater wetlands will create serious harm to the food and water sources for the many bird species and other kinds of animal life that have grown accustomed to and rely on this functional ecosystem that supports their habitats. [R.30-11 B. (3)(6)(8)]

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Because of this, we do not consider this proposed restoration project as benefitting our local ecology. It would remove at worst, and alter at best, brackish and freshwater wetlands that have long existed on this property, potentially doing more harm than good. These wetlands are currently not detrimental to the community, and unfortunately, they seem to be more beneficial to the applicant than to the wonderful resource that we have on our Island. [R.30-11 B. (7)]

We also have a question of ownership of most of the marshland/wetlands involved in this application. OCRM may not always consider ownership as a factor in reviewing critical area permits; however, this is a very unique and substantial request that involves wetlands which have actually been *judicially determined* in February of this year, *not* to be privately owned. This kind of request is far different from dock permits or boat ramp permits, or road permits that create land disturbances in critical areas for activity that goes over or onto public water or wetlands. Instead, this permit is a request to actually permanently alter types of water and associated ecosystems, all within public wetlands, for private benefit. [R.30-11 B.(5)].

To allow this to happen will create a precedent here on our Island, and elsewhere along our South Carolina coast, which would greatly impact not only the habitat issues described above, but would also impinge on the vitally important value of public use and access to our tidal and submerged lands. [R.30-11 B.(5)].

We are also very concerned that the applicant is proposing only minor upland buffers around the mitigation area, leaving a substantial amount of highland acreage available for future development. This has the serious potential of creating stormwater pollutants that would enter and damage these wetlands.

Overall, we are worried that the intent of the this application to remove berms, excavate critical area, and convert wetlands from one type of ecosystem and habitat to a different kind altogether, for private gain, is contrary to the general considerations outlined in the OCRM Regulations pertaining to Critical Area permitting, and other OCRM Regulations as may be applicable.

We are very hopeful that a public hearing can be scheduled before a decision is made about the permit. Thanks very much.

Sincerely yours,



John Taylor, Jr. by MLKelley  
Chair Vice Chair



Sarah Regan, Chair  
Environmental Sub-committee