

My name is Tom Myers, and I am the president of the Holden Beach Property Owners Association. In January 2020 our members passed a resolution objecting to the changes to the IHAs on Holden Beach. It is now three years later, we still have the same fundamental objection: The Inlet Hazard Area Method does not accurately reflect the trends for our accreting shorelines.

The consequence for Holden Beach is that the new IHA will direct development **away** from what has always been some of the lowest risk parts of our island. This is completely contrary to your intent of protecting property by minimizing the likelihood of loss in **vulnerable** areas.

- The geology and morphology of the island clearly shows that the Shallotte inlet is not migrating east – as evidenced by data that goes back to when the ICW was created.
- The west end of Holden Beach has never lost a structure to erosion – ever.
- The portion of the beach you are adding to the IHA has never been renourished and has been accreting for recorded history.
- These properties in the 900, 1000, and 1100 blocks typically command higher values due to their broader strand and deep dune fields that provided greater protection, so the impact of flagging them as hazardous and placing restrictions on them will have a significant impact on our island's tax base – which will negatively impact all property owners on the island.

Holden Beach has a robust shoreline management plan which includes extensive renourishment. In addition to the regular placement of inlet dredging sand on the east end of our island, in 2017 we placed 1.3 Mcy of sand on the central portion of our beach, and last year we placed an additional 1.5 Mcy in the same area. I live in the middle of the island, and in the past six years the dry sand beach in front of my house has moved seaward by hundreds of feet. Much of this new sand will migrate west due to longshore currents.

If the IHAM method doesn't accurately consider the impact of these renourishment efforts and continues to treat accretion the same as erosion by only looking at the standard deviation of shoreline change, then the result of our renourishment efforts will be to expand the IHA even further eastward as the down-drift portion of the island continues to pick up the new sand.

It has now been more than six years since the initial analysis was completed, which was prior to both our major renourishment efforts. We are requesting that you please conduct your 5-year update and hold off on implementing anything until that updated analysis is complete and the findings can be incorporated into your decisions.

Thank you for your time and consideration.