

Lack of Transparency

1. After 45 years of sitting on this issue, CRC did not provide formal notice to property owners that will be affected by the proposed new boundaries, amendments, and now, the financial impacts. With no warning, this matter was discussed and is now being voted on, all while individual citizens have purchased homes and land with the intent of building their homes.
2. This matter appears to be headed for approval, yet no effort has been made (or even attempted) to receive broad public comments. A mere 15 minutes for public comment prior to commission discussion and votes is irresponsible.
3. There is no mechanism for the public to see what is being discussed at the CRC meetings. They are not livestreamed or even made available after the fact, which severely limits public participation and the ability to understand what the CRC is doing.
4. CRC meeting minutes are not readily available. Minutes from previous meetings are not posted online until shortly before the next meeting when the next agenda is posted. It seems as though the CRC is intentionally holding these meetings in the dark, deciding on the fate of people's homes and investments with little to NO knowledge of these decisions.
5. CRC minutes, when they are finally posted prior to the next meeting, are vague and do not provide any insight into the discussions that took place in the CRC meeting. This keeps outsiders from knowing what actually transpires during the CRC minutes.
6. CRC does not inform or educate the public about their rules in plain English. The issues being considered by the CRC are complicated in nature, and many citizens do NOT have the ability or wherewithal to hire consultants who can help us decipher the intricacies of these policies.

Regulatory Negligence

1. Current maps being used were drawn in 1978 and are antiquated.
2. CRC has been negligent by not updating the maps as originally proscribed.
3. CRC wants to change the rules after homes have been built and property has been developed over the last 45 years based on IHA maps that were never updated and on CRC rules that were never amended. The arbitrary limit of 49% destruction (or improvements) prevents many cottage owners from even being able to make structural improvements to their homes so that they can withstand storms or other destruction events.
4. The current Inlet Hazard Area Method, (IHAM), was developed in 2010 to draw areas of IHA, and was supposed to be updated every 5 years but was not updated until 2019.
5. Development could have been curtailed and owners compensated for the loss of their property values and rights if the CRC had not been negligent in its duty for 45 years.
6. The stated purpose of the CRC is to protect lives and property. This proposal destroys property and lives due to the CRC's 45 years of neglect. Many, many retirees have invested for many years in their coastal homes for their retirement days. To now be facing the possibility of losing that home (and even losing their ability to resell their home to recoup their investments or current economic value) is completely against the CRC's obligations of protecting its citizens.

7. IHAM directs development away from what has always been the safest stretch of Holden Beach. This is completely contrary to your goal of protecting life and property by minimizing the likelihood of loss.

Lack of Scientific Merit

1. CRC Science Panel (2019 study update) does not consider beach renourishment, construction of groins, or natural accretion of stand. To deny local municipalities of these efforts to pursue these environmentally acceptable mechanisms to protect its citizens' (tax payers') homes is unconscionable, and completely beneath the standards that we expect of our regulatory bodies.
2. Science Panel 2019 study does not present conditions as they are today. The new boundaries are based on old information.
3. The Science Panel is required to use sound scientific methods to determine boundary areas on the IHA maps. The Inlet Hazard Area Method, (IHAM), used to calculate the boundaries on the maps **did not** utilize sound scientific methods. They used extrapolation to calculate map boundaries which is not accepted as a sound scientific method.
4. The Science Panel methodology used linear progression that only used time as a factor, and ignored the many other variables to calculate the boundaries on the maps.
5. The IHAM method treats accretion the same as erosion by only looking at the standard deviation of shoreline change, thereby punishing highly accretive beaches.
6. The determination of the inlet-ocean transition boundary is based solely on an arbitrary line drawn on the standard deviation curve. There is no science behind this determination.

Undue Financial Impact on Citizens

1. Tax repercussions for ocean front towns and counties will be huge as home values (and property tax values) identified in the IHA will plunge. Many of the coastal communities do NOT have large resident bases, and the elimination of value in these homes will also mean lost tax revenues, which will need to be made up for by the rest of the communities' taxpayers.
2. Properties in the IHA will not be rebuildable if there is more than 49% destruction **no matter the cause**. This not only greatly devalues private property but also reduces these homeowners' abilities to sell their homes to recoup the investments they've made in these properties over the years.
3. Homes built before an arbitrary August 2009 date, will be grandfathered to rebuild but will never be allowed to rebuild over 2000 sq. ft. Why 2009? People have purchased property well past this time, and to provide them no remedy is arbitrary at best. If 2009 offered some significant change in re-buildability, you NEVER pushed this information on unsuspecting buyers who are now stranded. This is an enormous devaluation of private property, and completely unjust and unfair.
4. Financial impact of proposed changes will result in losses much greater than the \$1million impact that is projected.
5. Restrictions on private property equate to eminent domain without payment. If you're going to enact regulations of this magnitude, then you should be willing to pay the Fair

Market Value of each home in return for the destruction of value that you're going to impose.

6. There has been NO disclosures to prospective or current property owners about these contemplated decisions and the resulting destruction of citizens property values.