



Submitted electronically to PDPA-NAP@usace.army.mil and Stephen.Rochette@usace.army.mil

April 11, 2025

Mr. Adrian Leary
U.S. Army Corps of Engineers
Philadelphia District
ATTN: Environmental Resources Branch

RE: Draft Environmental Assessment Delaware Coast Protection
(NEPA Unique ID: EAXX-202-00-E5P-1742316597)

Mr. Leary,

The Surfrider Foundation Delaware Chapter (Surfrider) submits these comments to the U.S. Army Corps of Engineers (USACE) concerning the Draft Environmental Assessment (EA) for the *Delaware Coast Protection: Indian River Inlet Sand Bypass Project, North Beach Supplemental Sand Nourishment, Sussex County Delaware* (NEPA Unique ID: EAXX-202-00-E5P-1742316597) (the Project).

The Surfrider Foundation is a grassroots environmental organization of 80 chapters, 120 youth clubs, and more than 500,000 supporters, activists, and members in the United States, dedicated to the protection and enjoyment of the world's oceans, waves, and beaches, for all people.

According to the EA, the Project broadly consists of, *"the placement of beachfill along the shoreline on the north side of Indian River Inlet for the purpose of restoring and/or maintaining the berm and dune for a distance of approximately 5,000 linear feet north of the north inlet jetty. The EA also evaluates sand sources that would provide beachfill quality material for the beach restoration. The purpose of this action is to provide protection to the critical infrastructure of the*

State Route 1 Charles W. Cullen Bridge and its approach on the north side, which has been experiencing significant erosion.”¹

PROJECT CONCERNS

Notwithstanding major changes in beach structure at Northside over the coming year, we believe the proposed USACE beach fill Project should be put on hold until the proposed work on the north jetty of the Indian River Inlet is complete, sometime in early 2026.

Northside beach and accompanying dunes are currently in better shape than they have been in over 6-8 years, after the recent State of Delaware led beach replenishment—it does not appear that additional sand is needed at this time. We understand the State project successfully filled the beach and dune to the design template for that project, and that parts of the new dune exceed the design width and volume. The volume of sand placed recently by the State exceeds the volume placed in 2013 following Hurricane Sandy, which provided many years of storm protection, including several severe storms.

Summer and fall are peak seasons for surfing North Indian River Inlet. After a year or more of impacts and closures, efforts should be made to allow the recreational beach and surf break to be used. Closing portions of the beach again in fall of 2025 would be a significant blow to the recreational community and economy—especially since additional replenishment is not needed at this time. When the Project does move forward, we applaud the USACE’s plan to do “rolling closures” of 1000 feet of beach at a time, rather than closing the entire beach.

The north jetty repairs will help contain beach sand, in their current state they are “leaking” sand into the inlet. The more appropriate sequencing, now that the emergency sand replenishment is complete, is to upgrade the jetty prior to additional sand replenishment, which will have retainage issues.

The State of Delaware may be reluctant to operate the sand bypassing system while the proposed Project is underway, resulting in even more sand being lost from the beach at Southside into the inlet, rather than being bypassed.

Instead of beginning the proposed Project at Northside in fall 2025, we think USACE should:

1. Allow the recent State-led beach fill project to equilibrate, to determine where any additional sand may be needed.
2. Restart the sand bypassing system as soon as possible to begin recapturing sand from Southside, to prevent loss into the inlet.
3. Repair the north jetty to bring it into a more effective configuration at holding sand, before pumping additional fill onto Northside beach.

¹ USACE. Draft Environmental Assessment for the Delaware Coast Protection: Indian River Inlet Sand Bypass Project, North Beach Supplemental Sand Nourishment, Sussex County Delaware. March 2025. *Available at:* nap.usace.army.mil/Portals/39/docs/Civil/Public%20Notice/2025/IRI%20Beach%20Draft%20EA%202025.pdf

4. Be strategic with the federal money available for replenishment by waiting until it is apparent what the needs are.

PUBLIC HEARING REQUEST

We request a public hearing on this project. Northside beach at the Indian River Inlet is heavily used by the public, and multiple, large infrastructure projects are being proposed and are ongoing concurrently, so it makes sense to host a public meeting. Such a meeting should be announced in advance, held on a weekday evening, located near the Indian River Inlet, and if possible, streamed online.

The proposed borrow area, the ebb tidal shoal off the south side of Indian River Inlet, has never been used previously as a sand source for beach replenishment. There is significant public interest in learning how potential use of this shoal as a borrow area may affect fishing, beach erosion, operation of the sand by-passing system, and the landfall path of possible wind farm cables.

DNREC has studied sand movement in this area in an effort to determine how the evolution of this shoal complex may affect littoral drift from the south and sand by-passing operations. There is public interest in understanding how removing sand from this shoal may affect littoral sand transport.

Indian River Inlet is a heavily used surfing and recreational beach which has been impacted by debris and closures for much of the past year. There is significant public interest in getting information about how additional beach replenishment projects may avoid or minimize additional beach closures.

We thank you for considering and incorporating our comments.

Sincerely,
The Delaware Chapter of the Surfrider Foundation

Cc:
Delaware Department of Transportation (DelDOT)
Department of Natural Resources and Environmental Control (DNREC)
Delaware Seashore State Park (DSSP)