

Dr. Daniel J. Comerford III
Mayor



**Town of
Jupiter Inlet Colony**
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February 15, 2022

Robert Swithers
Southeastern States District Office
Bureau of Land Management
273 Market Street
Flowood, MS 39232

Dear Mr. Swithers,

We appreciated Peter DeWitt's succinct February 14 presentation concerning the proposed Shoreline Stabilization Project on the Indian River shoreline of JILONA.

As a neighboring Town, we are a most interested party. Since 2010, we have been advocating for shoreline stabilization and stronger management and reinforcement of rules to prevent man-made impacts on the dunes. We discussed the presentation at our February 14 commission meeting, and I've had a chance to gather feedback from residents. With appreciation for the BLM's efforts to address a situation that should have been tackled long ago, we offer this feedback.

First, we are acutely aware that the erosion was significant, but viewing that charts drove home how much the dunes have lost in the last few years. Given the urgency, we find the proposed concepts to be timid and insufficient to restore vegetation such as native trees, mangroves and seagrass that will "enhance aquatic and terrestrial habitats." The proposed concepts show no shoreline plantings like the "living shoreline" that was so successfully created on the Loxahatchee River portion of the land. Has the BLM given up on vegetation so essential to stabilization as well as creature habitat and food? We strongly urge you to look at options that provide vegetation in the stabilization plan.

Second, we are confused about the Pocket Beach Concept. If the drawing is accurate, we strongly oppose it. The scale of the pilings suggests that they jut 35 to 45 feet into the ICW and the area would concentrate the power boat usage, dissuading kayakers and paddlers from pulling up. We understand your desire to accommodate power boats, but we would not like to see – if the scale is correct—20 to 30 boats anchored in this area, to the exclusion of passive users. The proposed concept also seems to invite the "dune climbing" behavior that is one cause of the current loss of dune and bluff.

Third, it is unclear where the Observation Pier would be placed. We would like clarification to ensure the privacy of those on the opposite shore.

Fourth, we strongly urge that in the next iteration, ideas be proposed, and concrete steps be taken to ensure meeting the management goals of "*offer the public opportunities for outdoor recreation, solitude . . . of the ONA's seven key resources and values.*" Currently, on weekends, there is little solitude at the Indian River shoreline. We strongly urge you to establish rules that are standard in your own Parks and others in Florida. Some common prohibitions might include: *no amplified sound, such as large speakers on boats; no alcohol; no fireworks or bonfires; no unleashed pets; no trash left on site; no structures such "home-made" waterslides which are common on the dunes in the summer.* As you know, all these are common at JILONA's shoreline currently, often fueled by alcohol, as our residents' who pick up JILONA shoreline trash can attest. Rules require

enforcement and education. We urge that more resources be given to enforcement, especially on busy weekends. We suggest that education efforts be developed in conjunction with neighboring towns and responsible associations such as the Marine Industries Association.

Our residents love and cherish this unique historical and cultural asset. We will work with you to educate those who would abuse it, so they develop more respectful ways to use it.

This letter does not reflect the frustration many residents feel after watching years of tolerated destructive behavior on the dunes. Many feel that the BLM in these plans are favoring motor boat use of the shoreline over the "conservation," "restoration," "solitude," and "passive recreational" aspects mandated in the legislation. Personally, I agree but will let them make their case individually.

The Town welcomes an opportunity to discuss our concerns at a Zoom or in-person meeting convenient to you. We appreciate the progress; we wish to see a solution that truly stabilizes the dunes, meets the federal mandate to conserve and protect, and takes our residents' concerns into account.

Yours truly,



Dr. Daniel J. Comerford, III
Mayor/Police Commissioner