

REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

**Recommendations for Additions to or Deletions from
the Coastal Barrier Resources System**



**VOLUME 2
MAINE**

U.S. Department of the Interior



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the Coastal Barrier Resources System**

MAINE

Mapped, edited, and published by the Coastal Barriers Study Group

United States Department of the Interior
William P. Horn, Assistant Secretary for Fish and Wildlife and Parks

1988

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MAINE

INTRODUCTION

The Coastal Barrier Resources Act (CBRA) of 1982 (Public Law 97-348) established the Coastal Barrier Resources System (CBRS), a system of undeveloped coastal barriers along the Atlantic and Gulf of Mexico coasts. This atlas of coastal barriers in Maine has been prepared in accordance with Section 10 of CBRA (16 U.S.C. 3509), which states:

Sec. 10. Reports to Congress.

(a) In General.--Before the close of the 3-year period beginning on the date of the enactment of this Act, the Secretary shall prepare and submit to the Committees a report regarding the System.

(b) Consultation in Preparing Report.--The Secretary shall prepare the report required under subsection (a) in consultation with the Governors of the States in which System units are located and with the coastal zone management agencies of the States in which System units are located and after providing opportunity for, and considering, public comment.

(c) Report Content.--The report required under subsection (a) shall contain--

(1) recommendations for the conservation of fish, wildlife, and other natural resources of the System based on an evaluation and comparison of all management alternatives, and combinations thereof, such as State and local actions (including management plans approved under the Coastal Zone Management Act of 1972 (16 U.S.C. 1451 et seq.)), Federal actions (including acquisition for administration as part of the National Wildlife Refuge System), and initiatives by private organizations and individuals;

(2) recommendations for additions to, or deletions from, the Coastal Barrier Resources System, and for modifications to the boundaries of System units;

(3) a summary of the comments received from the Governors of the States, State coastal zone management agencies, other government officials, and the public regarding the System; and

(4) an analysis of the effects, if any, that general revenue sharing grants made under section 102 of the State and Local Fiscal Assistance Amendments of 1972 (31 U.S.C. 1221) have had on undeveloped coastal barriers.

Under the direction of the Assistant Secretary for Fish and Wildlife and Parks, this report has been prepared by the Coastal Barriers Study Group, a task force of professionals representing the National Park Service, U.S. Fish and Wildlife Service, U.S. Geological Survey, and other Departmental offices.

This volume of the report contains delineations of the existing CBRS units in Maine and delineations of additions to and modifications of the CBRS in this State which the Department of the Interior recommends to the Congress for its consideration.

BACKGROUND

Lying at the northeastern point of the conterminous United States, Maine contains 33,215 square miles, including 2,295 square miles of water; the area represents nearly one-half of the total land area of New England. It also has the longest shoreline in New England (3,400 miles) and is famed for its more than 3,000 coves, bays, fjords, and islands.

Maine's population is just over 1 million; 47 percent live in coastal towns. Much of the population is located near the coast or on coastal rivers in the major cities of Bangor, Waterville, Augusta, Lewiston, Auburn, and Portland.

The natural resource base of Maine continues to be its extensive forest land and coastal environments. The primary resources are timber, sand, gravel, limestone, building stone, peat, shellfish, and oceanic fish.

The landscapes of Maine include mountains (Mt. Katahdin is the highest at 5,267 feet), deep forests in central and northern Maine, and picturesque coves and bays along the coast. Its wildlife is equally diverse, including animals no longer or rarely seen elsewhere in the Northeast. Sea birds and mammals are particularly numerous along the coast. The extensive estuary associated with the Kennebec River is unique among rivers on the Atlantic coast because it

supplies enough sediment from inland sources to create barrier beaches--the Reid, Popham, and Small Point beach systems--at its mouth (Trudeau 1979).

The coastal area supports diverse industries including Maine's oldest and most traditional one--fishing. In 1975, fishing contributed \$249 million to the State's economy. Aquaculture is a growing industry and includes oyster, blue mussel, and lobster culture, along with hatcheries for salmon and trout. Farming continues along the coast, but has declined in recent years.

Recreation provides a major source of income for coastal communities. It is especially important along the easily accessible south-eastern region between Kittery and Bar Harbor. An estimated 5.5 million people visit Maine yearly, and two-thirds of them go to the coastal region. Over 15 percent of all houses along the coast are seasonal homes. Nearly 77 percent of Maine's recreation-related employment occurs in the coastal zone.

Mineral development includes the quarrying of rock (the coastal mines of Stonington are most notable) for export, limestone for use in cement and fertilizer, and sand and gravel for fill. Oil is imported through the deep harbors at Portland and Searsport. There is growing interest in developing additional deepwater ports along Maine's coast. Most manufacturing is done in York, Cumberland, Androscoggin, Sagadahoc, and Kennebec Counties.

COASTAL RESOURCE MANAGEMENT

Maine Coastal Resource Management

Maine's Coastal Program was established in 1969 and received Federal approval under the Coastal Zone Management Act (CZM) in 1978. The coastal zone includes islands, transitional and intertidal areas, salt marshes, wetlands, and beaches, and as required by the Act, extends seaward to the outer limit of the U.S. territorial sea. The coastal area also extends inland to those areas that may have a direct and significant impact on coastal waters. The State has passed 13 core laws addressing the coastal area. Although some of these laws were passed to meet the requirements of CZM, other factors have helped to define Maine's Coastal Program such as the following:

an extensive inventory of natural resources including the development of over 200 maps;

the use of political limits for the area, rather than physical or cultural features, to simplify implementation procedures and avoid inequities within a single town; and

the use of the head of tide as a geographic and jurisdictional reference in a number of State laws.

The 13 core laws that make up the Maine Coastal Program are administered by various

agencies within the State system. The laws are the basis of a strong regulatory program for the coastal zone. A description of each law follows.

1. The Protection and Improvement of Waters Act protects the quality of State waters by classifying them and requiring licenses for proposed discharges. It is administered by the Department of Environmental Protection.
2. The Alteration of Coastal Wetlands Act was passed in 1967 to protect the swamps, marshes, bogs, beaches, flats, and other wetlands bordering coastal waters by a permit system. It is administered by the Department of Environmental Protection.
3. The Shoreline Zoning and Subdivision Control Act requires municipalities to enact shoreland zoning for areas within 250 feet of water. It is administered by the Department of Environmental Protection.
4. The Land Use Regulation Act promotes principles of sound land use planning in unorganized areas. It is administered by the Land Use Regulation Commission.
5. The Land Subdivision Act requires municipalities to review subdivisions according to minimum State criteria. It is administered by the Municipal Planning Board and the Land Use Regulation Commission.
6. The Site Location of Development Act controls large projects through permit procedures. It is administered by the Department of Environmental Protection.
7. The Protection and Improvement of Air Act protects and enhances air quality by establishing standards and licensing proposed emissions. It is administered by the Department of Environmental Protection.
8. The Hazardous Waste, Septage, and Solid Waste Management Law promotes a coordinated statewide program regulating solid waste disposal. It is administered by the Department of Environmental Protection.
9. The Alteration of Rivers, Streams, and Brooks Act controls the alteration of flowing waters so that environmental quality is maintained. It is administered by the Department of Inland Fisheries and Wildlife.
10. The Oil Discharge Prevention and Pollution Control Act prevents, regulates, and expedites cleanup of oil spills; regulates the transfer and conveyance of oil; and sets up a fund for effective cleanup of spills. It is administered by the Department of Environmental Protection.
11. The Marine Resources Laws provide for the conservation of marine resources through regulations. They are administered by the Department of Marine Resources.

12. The Waterway Development and Conservation Act regulates development of hydro-power projects.
13. The Maine Rivers Act prohibits new dams and regulates development or redevelopment of existing dams on designated river segments.

Local Actions

In the private sector the Maine Coast Heritage Trust actively encourages landowners to restrict voluntarily development on the coast, particularly on Parsons Beach and Jasper Beach in Machiasport.

The Maine Audubon Society works with the State to develop regulations to protect sand dunes.

EXISTING CBRS UNITS

A brief description of each existing Coastal Barrier Resources System unit in Maine follows. Each unit is identified by its ID code and name (established by Congress in 1982) and the county in which it is located.

A01-Lubec Barriers (Washington). This unit consists of two main parts: a heath connecting West Quoddy Head State Park with the mainland, and a long, thin linear barrier spit, which runs southward from South Lubec toward West Quoddy Head in Lubec Bay. An improved road to the state park crosses the heath. The spit has a sand road running its entire length and contains small dunes and strand vegetation. The spit protects a narrow bay and mudflat. The third part of this unit is a very thin spit running westward on West Quoddy Head just west of the Coast Guard Station on the north side. This unit is in the Town of Lubec.

A01A-Baileys Mistake (Washington). This unit consists of a very small bay barrier

protecting a small pond at the head of Baileys Mistake Bay, and a portion of shoreline around the north and east side of Baileys Mistake Bay.

A03-Jasper (Washington). This unit is also known as "Howard Cove Beach." It is a bay head barrier located between Seashore and Howard Mountains at the head of Howard Cove in the Town of Machiasport.

A03B-Starboard (Washington). This unit is a small spit jutting into Starboard Cove just south of the Village of Starboard in the Town of Machiasport. It includes a tidal flat and shoreline to the west of the spit. A light-duty road runs out to the spit and a sand road crosses the tidal flat.

A03C-Popplestone Beach/Roque Island (Washington). There are two parts to this unit: a beach around the western side of Roque Island Harbor, and a short bay barrier called Popplestone Beach, which protects a small pond. Both sections are in the Town of Jonesport.

A05A-Seven Hundred Acre Island (Waldo). This unit contains two thin bay barriers and associated salt marshes on either side of the south end of Seven Hundred Acre Island in Penobscot Bay in Isleboro.

A05B-Head Beach (Sagadahoc). This unit consists of a sand/cobble beach called "Head Beach" which connects Hermit Island to the western side of Cape Small in Phippsburg. Also included are tidal flats and low-lying portions on the south side of Hermit Island.

A05C-Jenks Landing/Waldo Point (Cumberland). This unit consists of two parts on the north and south sides of Johnson Cove on Great Chebeague Island in Casco Bay.

A06-Cape Elizabeth (Cumberland). Two sub-units in the Town of Cape Elizabeth make up

CBRS UNITS IN MAINE ESTABLISHED BY CONGRESS, 1982

Unit Name	Unit ID Code	County	Shoreline Length (miles)	Total Area (acres)	Fastland Area (acres)
Lubec Barriers	A01	Washington	0.3	338.8	86.6
Baileys Mistake	A01A	Washington	1.5	29.8	29.8
Jasper	A03	Washington	0.2	59.8	5.6
Starboard	A03B	Washington	0.2	27.2	12.0
Popplestone Beach/ Roque Island	A03C	Washington	1.8	34.9	34.9
Seven Hundred Acre Island	A05A	Waldo	1.2	102.1	102.1
Head Beach	A05B	Sagadahoc	0.7	125.6	54.7
Jenks Landing/ Waldo Point	A05C	Cumberland	0.8	48.4	48.4
Cape Elizabeth	A06	Cumberland	0.8	42.7	29.1
Scarborough Beach	A07	Cumberland	0.8	97.5	32.6
Crescent Surf	A08	York	1.1	69.2	30.1
Seapoint	A09	York	0.6	69.4	19.4
Totals:			10.0	1,045.4	485.3

this unit. The eastern subunit consists of a small cape behind Richmond Island protecting a small pond and wetland. The western subunit contains a bay barrier, just east of the Cod Rocks, which protects a pond and marsh system.

A07-Scarborough Beach (Cumberland). This unit is a bay barrier protecting Massacre Pond and its associated marshes. Lands adjacent to both ends of the beach have residential developments, but the barrier itself is sparsely developed. Access to the area is primarily by two light-duty, paved roads. The beach is used for recreation by local residents. The area includes a freshwater pond, wetlands, and a barrier beach. It is located in the Town of Scarborough.

A08-Crescent Surf (York). There are two spits in this unit, both in the Town of Kennebunk: one extends east from a headland called Parsons Beach; the other, Crescent Surf, extends westward. An upland peninsula lies between the two spits. The eastern spit borders on the Monson River Division and the western on the Upper Wells Division of the Rachel Carson National Wildlife Refuge. This area has a rocky intertidal region, a tidal creek/salt marsh ecosystem, and a pitch pine forest. Present development consists of at least four buildings which are serviced by private, light-duty roads. One road enters the northern end of the unit and runs south along the barrier. The second road meets the first about halfway along its length. The beach is used for recreation by local residents.

A09-Seapoint (York). This unit consists of two connected beaches on either side of a rocky headland called Seapoint; the northern beach is Seapoint Beach, and the southern is Crescent Beach. The unit is located in the Town of Kittery. Seapoint has a cobble beach backed by a storm ridge which has been modified by bulldozing for a road that is now closed. There is a freshwater marsh behind the barrier. Seapoint Beach receives moderate use by local residents. Access to the beach is by boat or by footpath down a dirt road closed to vehicles.

REFERENCE

Trudeau, P.M. 1979. Ecology of barrier beaches in south central Maine. Ph.D.

Dissertation, University of Massachusetts, Amherst. 389 pp.

RECOMMENDED ADDITIONS AND MODIFICATIONS

The Department of the Interior recommends that all undeveloped, unprotected coastal barriers and associated aquatic habitat identified in Maine be added to the Coastal Barrier Resources System. The DOI also recommends that otherwise protected, undeveloped coastal barriers be excluded from the CBRS. However, if these otherwise protected coastal barriers are ever made available for development that is inconsistent with the purposes of the CBRA, the DOI recommends that they then be automatically included in the CBRS. A complete discussion of DOI's recommendations concerning otherwise protected undeveloped coastal barriers, including suggested guidelines for acceptable development, appears in Volume 1. Maps of all undeveloped, otherwise protected coastal barriers in Maine appear in the following section. A table summarizing the Department's recommendation on each unit or proposed unit identified in Maine follows this discussion.

The Department of the Interior's recommendations were developed after full consideration of the many public, State and Federal agency, and Congressional comments on the delineations in the draft report released in March 1987.

The State of Maine reviewed the 1987 Draft Report and made recommendations on the boundaries of many existing and proposed CBRS units in the State. These recommendations are discussed in the following section, interspersed with the appropriate maps. The State supports a CBRS expansion in Maine, but opposes excluding otherwise protected coastal barriers from the CBRS. The State's positions on the DOI's general recommendations are discussed in Volume 1.

The Department received 4 other comments concerning Maine. All of these also expressed support for a CBRS expansion in Maine and opposed excluding otherwise protected coastal barriers from the CBRS.

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN MAINE

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shore-line Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
ME-01	Carrying Place Cove	Washington	2	0.4	161	4	Add to CBRS
ME-02	Birch Point	Washington	2	0.5	83	12	Add to CBRS
A01	Lubec Barriers	Washington	2	1.8	396	53	Delete nonbarrier segment from and add wetland to existing CBRS unit

(continued)

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN MAINE (CONTINUED)

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shore-line Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
A01A	Baileys Mistake	Washington	2	0.3	15	11	Delete nonbarrier segment from existing CBRS unit
ME-04	Seal Cove	Washington	2	0.4	69	6	Add to CBRS
A03	Jasper	Washington	2	0.6	81	17	Add new barrier segment to existing CBRS unit
A03B	Starboard	Washington	2	0.2	27	12	No change to existing CBRS unit
ME-06	Bare Cove	Washington	2	0.2	23	4	Add to CBRS
ME-07	Roque Bluffs	Washington	2	—	—	—	Misidentified as a barrier in draft report; <u>not</u> a recommended addition
A03C	Popplestone Beach/ Roque Island	Washington	2	3.0	251	85	Add three small barriers to existing CBRS unit
ME-08	Flake Point	Washington	2	0.3	33	9	Add to CBRS
ME-10	Over Point	Washington	2	0.3	27	10	Add to CBRS
ME-11	Pond Island	Hancock	2	1.0	151	17	Add to CBRS
ME-12	Thrumcap	Hancock	2	0.7	870	93	Add to CBRS
A05A	Seven Hundred Acre Island	Waldo	1	1.2	102	102	No change to existing CBRS unit
ME-14	Nash Point	Knox	1	0.5	50	10	Add to CBRS
ME-16	Hunnewell Beach	Sagadahoc	1	2.1	597	113	Add to CBRS
ME-17	Small Point Beach	Sagadahoc	1	1.0	352	88	Add to CBRS
A05B	Head Beach	Sagadahoc	1	0.7	126	55	No change to existing CBRS unit
A05C	Jenks Landing/ Waldo Point	Cumberland	1	1.8	544	137	Add two new areas to existing CBRS unit
ME-18	Stover Point	Cumberland	1	0.4	18	5	Add to CBRS
A06	Cape Elizabeth	Cumberland	1	0.8	43	29	No change to existing CBRS unit
A07	Scarborough Beach	Cumberland	1	0.8	97	33	No change to existing CBRS unit

(continued)

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN MAINE (CONCLUDED)

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shore-line Length ^d (miles)	Total Area ^e (acres)	Fast-land Area ^f (acres)	Recommendation ^g
A08	Crescent Surf	York	1	2.2	401	62	Add new areas (Crescent and Laudholm Beaches) to existing CBRS unit
ME-23	Phillips Cove	York	1	0.7	39	14	Add to CBRS
A09	Seapoint	York	1	0.6	84	24	Add inholdings to existing CBRS unit
Total - CBRS as Recommended				22.5	4,640	1,005	
Existing CBRS				10.0	1,045	485	
Net Change in CBRS				+12.5	+3,595	+520	

^aUNIT ID CODE - State initials (ME) plus a number identify a proposed new unit. An existing unit is identified by the legal code letter (A) and number established by Congress in 1982.

^bUNIT NAME - For proposed new units, this is a provisional name based on a prominent local feature. For existing CBRS units, this is the legal name.

^cCONGRESSIONAL DISTRICT - U.S. Congressional District in which unit is located.

^dSHORELINE LENGTH - For existing units with additions or deletions, this length is for the entire unit, as modified.

^eTOTAL AREA - For existing units with additions or deletions, this area is for the entire unit, as modified.

^fFASTLAND AREA - This acreage is a rough estimate of the portion of the total area that is above the mean high tide line (i.e., the non-wetland area). It is a very general representation of the potentially developable land.

^gRECOMMENDATION - A brief explanation of the Department's recommendations to Congress. For more detailed explanations, see the following section. Abbreviations: FWS = Fish and Wildlife Service, NPS = National Park Service, CBRS = Coastal Barrier Resources System.

STATE COMMENT LETTER

1583



STATE OF MAINE
OFFICE OF THE GOVERNOR
ALBANY, MAINE
04403

June 30, 1987

Donald P. Hodel, Secretary
Department of the Interior
18th and C Streets, NW
Washington, D.C. 20240

Dear Secretary Hodel:

I am writing in response to your request for comments on the Coastal Barriers Resources System draft report to Congress.

The State's comments on the report are divided into three parts — Department of Interior's recommendations to Congress, general comments about the maps and designated sites in Maine, and specific site-by-site comments.

Draft Recommendation to Congress

The draft report contains a series of recommendations, several of which Maine would like to comment on. These include:

1. Scope of the System - The DOI should actively pursue its April, 1985 position to extend the CBRS to the Great Lakes and Pacific coast. The extensive barriers located along these shorelines function similarly to those on the Atlantic and Gulf coasts. The DOI should recommend to Congress to extend the federal funding restrictions to these shorelines.
2. Associated Aquatic Habitats - The broadening of the definition of "associated aquatic habitats" on page 9, seems expensive, particularly with regard to "... the entire area subject to diminished wind, wave, and tidal energy during a major storm..." and "... up to a one-mile expanse of open water..."
3. Otherwise Protected Coastal Barriers - All coastal barriers that meet the physical criteria as defined in the Act, should be included within the CBRS irrespective of ownership. In addition, the proposal to rely on the GSA, DOI, or states to act promptly when ownership of a barrier occurs is not feasible.
4. Tax Policy Alternatives - One important subsidy to coastal barrier development is casualty loss deductions which allow owners of property in hazardous coastal areas to repeatedly deduct losses resulting from coastal storms. I urge you to reconsider your recommendations regarding no tax amendments.

Donald P. Hodel
June 30, 1987
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DOI Maps and Designated Sites

Map Quality - The map scale and quality of reproduction make it extremely difficult to determine what the appropriate side, landward, and seaward boundaries are. Currently the maps provide the approximate location of the barriers but are not suitable for determining the extent of the barrier.

To illustrate this problem, barrier A05E contains a 30-foot hill and ME-04 has a hill in excess of 40 feet. The opposite situation has also occurred where the DOI designation did not include the entire "barrier" as in A01. Extensive salt marsh along the northwest border is omitted from the current designation.

In several instances the topographic and cultural information used by the DOI to identify sites is inaccurate because the shoreline has changed (ME-02) or developed barriers are now undeveloped (Hunnewell Beach near ME-16).

Site-by-Site Comments

A01 - A sizable portion of the Lubec salt marsh and bay are not included within the boundaries, while a significant area of upland bedrock is. The beach between Quoddy Head and the mainland is not a tombolo and should not be included.

A01A - The eastern portion of Baileys Mistake is primarily upland with some intertidal bedrock and no coastal barrier.

ME-02 - The entirety of Birch Point is a coastal barrier. The map fails to include barrier beach and salt marshes contiguous with those already in the system.

A03 - A long stretch of barrier beach and coastal lagoon are not included in Jasper Beach even though they are undeveloped and contiguous with included areas that are slightly developed. In addition, there is no intervening headland as asserted by DOI.

ME-04 - A large upland area (northwest head) is included in the system while a significant barrier beach and marsh are excluded (grassy point).

ME-07 - This site should be deleted. An upland area at the 20' contour has been included.

A03C (Roque Island) - This beach system is geologically similar to the beach on the other side of the island and should be included. Consideration should also be given to Great Bar and an area north of Rhine Point which contains a beach, marsh, and lagoon.

Donald P. Hodel
June 30, 1987
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ME-11 - Pickering Island should be considered.

ME-12 - The spits of Bass Harbor should be considered.

A05A - Philbrook Cove is quite similar to A05A.

A05C - Cliff Island tombolos ought to be included, as might Indian Bar on the south end of Great Chebeague Island.

I appreciate the opportunity to comment on the draft report and maps. I encourage you to contact David Wesley (Maine State Planning Office - 207/289-3261) or Joe Kelley (Maine Geological Service - 207/289-2801) should you have any questions regarding our comments.

Sincerely,

John R. McKernan, Jr.
Governor

JRM/lcf

CC: Richard Silkman, State Planning Office
Walter Anderson, Maine Geological Service

OTHER GENERAL COMMENT LETTERS CONCERNING MAINE

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CLF

Conservation Law Foundation of New England, Inc.

3 Joy Street
Boston, Massachusetts
02108-1497
(617) 742-2540

May 29, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service - 498
P.O. Box 37127
Washington, D.C. 20013-7127

Re: Draft Section 10 Report to Congress and Proposed
Recommendations for the Coastal Barrier Resources
System (52 Fed. Reg. 9618-9619, March 25, 1987)

Dear Sir/Madam:

The Conservation Law Foundation of New England, Inc. (CLF) is pleased to submit the following comments on the Coastal Barriers Study Group's Draft Report to Congress and its proposed recommendations for additions to and deletions from the Coastal Barrier Resources System (CBRS) and for conservation of the CBRS' natural resources under Section 10 of the Coastal Barrier Resources Act (CBRA). CLF is a non-profit, public interest, environmental law organization dedicated to the conservation and preservation of New England's environment, including its coastal resources.

CLF also submitted comments on the Coastal Barriers Study Group's draft maps, definitions, and delineation criteria for the CBRS in 1985. We attach a copy of those comments and incorporate them by reference.

I. Proposed Recommendations for Additions to or Deletions from the CBRS

A. Geographic Scope

CLF supports the proposed inclusion of the Florida Keys, Puerto Rico, and the Virgin Islands in the CBRS. The ecological and mainland protection values of the barriers in these areas, combined with the severe development pressures they are experiencing, make their inclusion in the CBRS timely and essential.

We are disappointed, however, by your decision not to recommend the inclusion of the Great Lakes and Pacific Coasts in the CBRS. The initial inventory included 269 units from these regions. Barriers along these coasts perform the same beneficial

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ago to build a large headquarters and visitor center within the Parker River National Wildlife Refuge on Plum Island, Massachusetts. It took a combination of lengthy negotiations between the government and a coalition of environmental groups (including CLF), congressional intervention, and financial assistance from a private conservation organization to convince the Fish and Wildlife Service to site its building at an off-island location. A more current example is the proposal by the Assateague Island National Seashore in Maryland to spend millions of dollars on a beach nourishment project in an attempt to stop erosion along the northern portion of the island -- a project with little chance of long-term success and whose primary immediate beneficiaries will be private developers who want to build in high-hazard floodplain areas on the mainland.

"Otherwise protected" areas should be included in the CBRS, with appropriate guidelines that allow federal expenditures within these areas but restricts it to those projects that are consistent with the interests of the CBRA.

E. Expansion of the Definition of "Coastal Barrier"

We fully support an expanded definition of "coastal barrier" to include landforms that function as coastal barriers but are not composed entirely of unconsolidated sediments. Among the areas that would be added to the CBRS under the broadened definition are the granitic bedrock outcroppings and glacial deposits that are so common in New England.

F. Proposed Additions/Deletions in New England

As noted above, we have attached a copy of our comments on the 1985 draft maps, definitions, and delineation criteria. Those comments contained detailed discussions of our views on the proposed additions and deletions to the CBRS in New England. We ask you to refer to those comments, and offer the following additional comments.

1. Maine

We reiterate our support for maximum protection of coastal barriers in Maine, particularly along the southern coast, where development pressure is greatest.

2. New Hampshire

We are informed by the New Hampshire Office of State Planning that Wallis Sands Beach and Rye Harbor (NH-01 and NH-02), which were included in the 1985 inventory, have been eliminated from further consideration because they are already developed. This differs from the reason given previously by Governor Sununu and the Office of State Planning for eliminating

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functions, provide similar fish and wildlife habitat, and experience the same storm damage/subsidized reconstruction cycles as the rest of the nation's coastal barriers. Their inclusion in the CBRS would be consistent with both the interests enumerated in the CBRA and the Department's proposal to expand the definition of a "coastal barrier" to include geological formations that are different from the originally protected areas of the Atlantic and Gulf Coasts but function as coastal barriers (see Section I.C below). We urge you to reconsider your decision and to recommend inclusion of the Great Lakes and Pacific Coasts in the CBRS.

B. Associated Aquatic Habitats

CLF welcomes the proposed recommendation to include all associated aquatic habitats in the CBRS. Their inclusion would recognize their inseparability from the other parts of coastal barrier ecosystems and eliminate the inconsistency between the CBRA's definition of "undeveloped coastal barrier" (which includes associated aquatic habitats) and the extent of the existing CBRS.

C. Secondary Barriers

As a New England organization, we are particularly pleased to see the proposed recommendation to include secondary barriers in the CBRS. Large embayments such as Long Island Sound, Narragansett Bay, and Buzzards Bay in Massachusetts provide many examples of secondary barriers, which, while generally smaller than high-energy barriers exposed to the open ocean, nevertheless perform all the functions of other coastal barriers.

D. "Otherwise Protected" Coastal Barriers

CLF supports the inclusion of all eligible "otherwise protected" areas in the CBRS. To that end, we support the proposed recommendation to include all privately owned areas within conservation or recreation areas established by federal, state, or local law (inholdings), in the CBRS, as well as any land held for conservation purposes by private groups if the land is later sold for development. Moreover, we urge you to work with Congress on developing your suggested amendment to the CBRA that provides for guidelines to aid in determining whether development in such inholdings is consistent with the interests of the Act. However, we firmly believe that the proposed recommendation does not go far enough, and that inclusion of "otherwise protected" areas within the CBRS is desirable.

It is not safe to assume that all federally supported projects in these "otherwise protected" areas will be consistent with the conservation goals of the CBRA. A prime example in New England is the Fish and Wildlife Service's proposal several years

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these units, i.e., that they are not coastal barriers (letter from Governor John H. Sununu to Secretary James Watt, March 31, 1983; letter from David G. Scott, Acting Director, Office of State Planning to J. Craig Potter, March 20, 1985). We suggest that the Coastal Barriers Study Group reexamine the available information about these units and the reasons for eliminating them from further consideration.

The remaining units in the 1985 inventory (NH-03, NH-04, and NH-05) have evidently been excluded because they are "otherwise protected." Mr. Scott's 1985 comments on one of these areas, Hampton Beach State Park (NH-05) referred to the consequences of inclusion in the CBRS on "future development of the State Park." This underscores the importance of including such areas in the CBRS.

3. Massachusetts

CLF supports all proposed recommendations for expansion of the CBRS in Massachusetts. The decision to exclude all "otherwise protected" areas is felt strongly in the Commonwealth, affecting such areas as the Parker River National Wildlife Refuge (MA-02), portions of the Cape Cod National Seashore (MA-17, MA-18, MA-19, and MA-20), the Monomoy National Wildlife Refuge (MA-21), and Waquoit Bay (C-18).

4. Rhode Island

We reiterate our support for maximum inclusion within the CBRS, especially in the vicinity of Little Compton and the Sakonnet River, including Little Compton Ponds (D-01), especially Tunipus Pond and Briggs Marsh; Brown Point (RI-01); Fogland Marsh (D-02); Sapowet Point (RI-02); Sandy Point (RI-03); Almy Pond (RI-06); Hazards Beach/Lily Pond (RI-07); Green Hill Beach (D-04); East Beach/Charlestown Beach (D-05); and Misquamicut Beach (RI-14). We oppose any deletion from the Little Compton Ponds unit (D-01). In addition, we urge full inclusion of Easton's Pond (RI-05).

5. Connecticut

Once again, we support full inclusion of all identified eligible areas in Connecticut. We echo the comments of the Connecticut Coastal Zone Management Program, which has called for inclusion of all "otherwise protected" areas with appropriate guidelines for allowable projects. Connecticut would especially benefit from adoption of the proposed recommendation to include secondary barriers in the CBRS.

II. Proposed Conservation Recommendations

A. Deletion of Military and Coast Guard Lands

Buried in the draft report's section on "Federal Stewardship: The Acquisition Alternative" is the proposed recommendation that the areas currently included in the CBRS on military and Coast Guard lands be deleted. We reject this proposal, and the underlying assumption that all military spending is essential for national security. Coastal barriers owned by the military and the Coast Guard are no different from other undeveloped coastal barriers, and need and deserve just as much protection from unnecessary development. We call on you to drop this proposed recommendation and keep the military and Coast Guard on an equal footing with private landowners and other federal agencies. Environmental laws should apply equally to all parties, public and private.

B. Application of Section 5 Funding Prohibition to Projects Outside the CBRS that Benefit CBRS Units

CLF agrees with your conclusion that Section 5 of the CBRA prohibits federal financial assistance to any project that serves a CBRS unit, even if the project is located outside the CBRS unit in question. We applaud your recognition that federal financial assistance to such projects is inconsistent with the purposes of the CBRA, since they subsidize the very sort of coastal barrier development that the CBRA seeks to discourage.

C. Deletion of the "Essential Link" Language of Section 6(a)(3)

CLF supports the proposed recommendation to eliminate the loophole provided by Section 6(a)(3) of the CBRA. We agree that Section 6(a)(6)(F) better protects the interests of the CBRA by restricting the repair, replacement, or reconstruction of roads and other public facilities within the CBRS to projects that are consistent with the conservation purposes of the CBRA.

D. Restrictions on Dredged Material Disposal

CLF also supports the proposed recommendation to amend Section 6(a)(2) of the CBRA to require that dredged material disposal within the CBRS be consistent with the conservation goals of the CBRA. The amendment would close another potential loophole.

E. Deletion of the OMB Certification Requirement of Section 7

While we agree that the Office of Management and Budget is ill-equipped to monitor federal agency compliance with the CBRA

because it lacks the capability to audit agency spending, we do not think that the solution is to eliminate the certification requirement entirely. We suggest that you instead recommend that Congress ask the General Accounting Office, which is able to audit expenditures, to take on the certification task.

Sincerely,

Paul Hauge

Paul Hauge
Staff Scientist

/ph
encl.

cc: Governors and coastal zone management/state planning offices of Maine, New Hampshire, Massachusetts, Rhode Island, and Connecticut
Congressional delegations of Maine, New Hampshire, Massachusetts, Rhode Island, and Connecticut
National Wildlife Federation

1161



June 22, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service
Box 37127
Washington, DC 20013

Dear Coastal Barriers Study Group:

I am writing on behalf of the Natural Resources Council of Maine to comment on the Department's report to Congress on coastal barriers. The Council is a private conservation organization with 7,700 members from around the state of Maine and beyond. We have been extremely active over the past decade in working to protect Maine's sand beaches and coastline from inappropriate development.

Development pressures along Maine's coast have risen dramatically in the past few years. Pressures are particularly severe along Maine's few miles of sandy coastline. Strong actions are needed at both the State and Federal level to protect this fragile and limited resource. Maine's Board of Environmental Protection is in the process of placing increased restrictions on sand dune development.

The Council strongly supports the Coastal Barrier Resources System program and we applaud DOI's efforts to expand the scope of the program. We agree with all the CBRS additions proposed in Maine. Each of the areas is deserving of inclusion in the program. However, there is concern among state coastal officials that the maps used to define these areas are not adequate to stand up to legal scrutiny.

We have several comments on the proposed policy recommendations in the report. We strongly oppose the exclusion of military holdings, state parks and all roads in the Federal network from the program. In each case there is great potential for tax dollars to be wasted on development which could damage fragile barrier systems, increase property damage from coastal storms, and

Coastal Barriers Study Group
June 22, 1987
Page 2

endanger human life.

For example, the Cutler Naval Base in Maine owns Sprague Neck, a very important sand spit in Machias Bay. There is the very real threat that the base will decide to develop the neck for recreational purposes which have nothing to do with "national security." We believe that it is inappropriate and hypocritical for the Federal government to allow the military to develop in areas where the public cannot.

The same argument applies to state parks where construction of parking lots, beach houses, and other structures could damage barrier systems and for Federal roads built in sensitive and dangerous areas. We must hold government agencies to the same environmental and economic standards that we hold the public to.

Thank you for this opportunity to express the views of the Natural Resources Council of Maine. Please feel free to contact me if you have any questions.

Sincerely,

Jerry A. Bley
Jerry A. Bley
Resource Specialist

1168



MAINE AUDUBON SOCIETY
Gisland Farm • 118 U.S. Route One • Falmouth, Maine 04105 • 781-2330
The responsible voice for Maine's environment and natural resources

June 22, 1987

Coastal Barriers Study Group
U.S. Department of the Interior
National Park Service - 498
P.O. Box 37127
Washington, D.C. 20013-7127

Dear Sirs/Madams:

The 1982 Coastal Barrier Resources System began protecting fragile coastal ecosystems from damaging development. Maine Audubon supports your recommendations to expand the System to include new areas located in the U.S. Virgin Islands, Puerto Rico, the Florida Keys, Maryland, New Jersey, private holdings in already protected areas, associated aquatic habitats, and secondary barriers in embayments. We also support your recommended additions to existing units.

We are highly supportive of the Maine additions and our familiarity with the southern sites permits us to applaud the Sunnwell Beach site. Developed barrier beaches should be included in future revisions of the system, especially Pine Point to Camp Allis, Higgins Beach, Drakes Island, and Wells Beach. State, local and federally owned beaches should also be added. Ownership can always change hands and, perhaps more important, governmental entities should not be allowed to develop barrier beaches.

Development in coastal barriers and in their associated aquatic habitats destroys these critical ecosystems and the coastal fish and wildlife dependent upon them. Sea level rise accentuates these adverse impacts. Storms and the erosion of shoreline cliffs and bluffs, and the reduction of beach sand supplied by dams on rivers are accelerating the retreat of Pacific shorelines arguing for their inclusion in the System. Likewise, high and fluctuating lake levels are causing serious problems along the Great Lakes meriting consideration of certain lake shorelines.

We oppose the following proposed deletions from the System:

1. Military coastal barriers need protection from unnecessary development as much as barriers on private lands. For example, no exceptions should be made for funding military clubs on barrier beaches as such expenditures are not essential to national security.
2. Deletion of the Mobile Point Unit in Alabama would serve as an unwanted symbol. If development after designation as a Barrier assures deletion from the System, the incentive to leave fragile coastal lands undeveloped is removed.

Unsound development in flood prone areas benefits very few people at the expense of taxpayers. Development on barrier beaches must continue to NOT receive federal funding for roads, bridges, sewers, water lines, housing and insurance.

Thank you for your consideration of our comments.

Sincerely,

Karin R. Tylberg

Karin R. Tylberg, Esq.
Director of Advocacy

P.C. Governor John McKernan, Jr.
David Keeley, State Planning Office
Senator William S. Cohen
Senator George J. Mitchell
Congressman Joseph E. Brennan

1282



Working for the Nature of Tomorrow,
NATIONAL WILDLIFE FEDERATION
1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

Coastal Barriers Study Group
Department of the Interior
National Park Service
P.O. Box 37127
Washington, D.C. 20013-7127

RE: Comments on the Coastal Barrier Resources Act--Section 10 Draft Report to Congress. 52 Federal Register 9618-9619

Dear Sir or Madam:

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society are writing in response to the Department of the Interior's Federal Register Notice of March 23, 1987 soliciting comments on the Draft Report to Congress: Coastal Barrier Resources System--Executive Summary.

Our organizations have a longtime interest in the conservation of coastal barriers. The Natural Resources Defense Council was the founding organization of the Barrier Islands Coalition in 1978. Likewise, the National Wildlife Federation, the Coast Alliance, and the Oceanic Society became members of that coalition in 1979 to help seek protection of coastal barriers.

Our organizations have led efforts to pass legislation which would conserve the natural resources of coastal barriers--first, the flood insurance prohibition in the Omnibus Reconciliation Act in 1981 and then, the Federal financial prohibition in the Coastal Barrier Resources Act (CBRA) in 1982. We continue to support the goals of CBRA and expansion of the Coastal Barrier Resources System (CBRS) throughout the United States and its territories. The Federal government should not be subsidizing development in hazardous areas which destroys productive coastal ecosystems, endangers the lives and properties of shoreline residents, and costs federal taxpayers millions of dollars each year in flood insurance claims and disaster relief.

The need for an expanded Coastal Barrier Resources System in which federal development subsidies are prohibited is becoming increasingly critical in light of the projected rise in sea levels due to global warming. As water levels rise, so will the costs of protecting existing structures, the damages from erosion and flooding, and the risk to human life and property. Unfortunately, however, development in these unstable coastal areas continues to grow at a frightening pace. We feel strongly, therefore, that it is essential that the Department recommend maximum expansion of the System to include the eligible areas on all of America's coasts

- 2 -

before these sites are irrevocably committed to development. An appendix of specific comments on additions to and deletions from the System follow our general comments.

PROPOSED RECOMMENDATIONS FOR ADDITIONS TO
OR DELETIONS FROM THE CBRS

We support the Department's recommendation to expand the definition of a "coastal barrier" to include landforms which function as coastal barriers in protecting the mainland and adjacent aquatic habitats, even if they are not composed of unconsolidated sediments as are barriers in the traditional definition. Use of this expanded definition in delineating CBRS units is consistent with the conservation goals of CBRA and would allow for the inclusion of such new geological formations as undeveloped beach rock, cemented dunes, fringing mangroves and associated coral reefs, cheniers, discontinuous outcrops of bedrock, and coarse glacial deposits. Since these areas serve the same function as coastal barriers and are as vulnerable to development pressure, sea level rise, and storm damage as traditionally-defined coastal barriers, it is appropriate that they also be protected within the System.

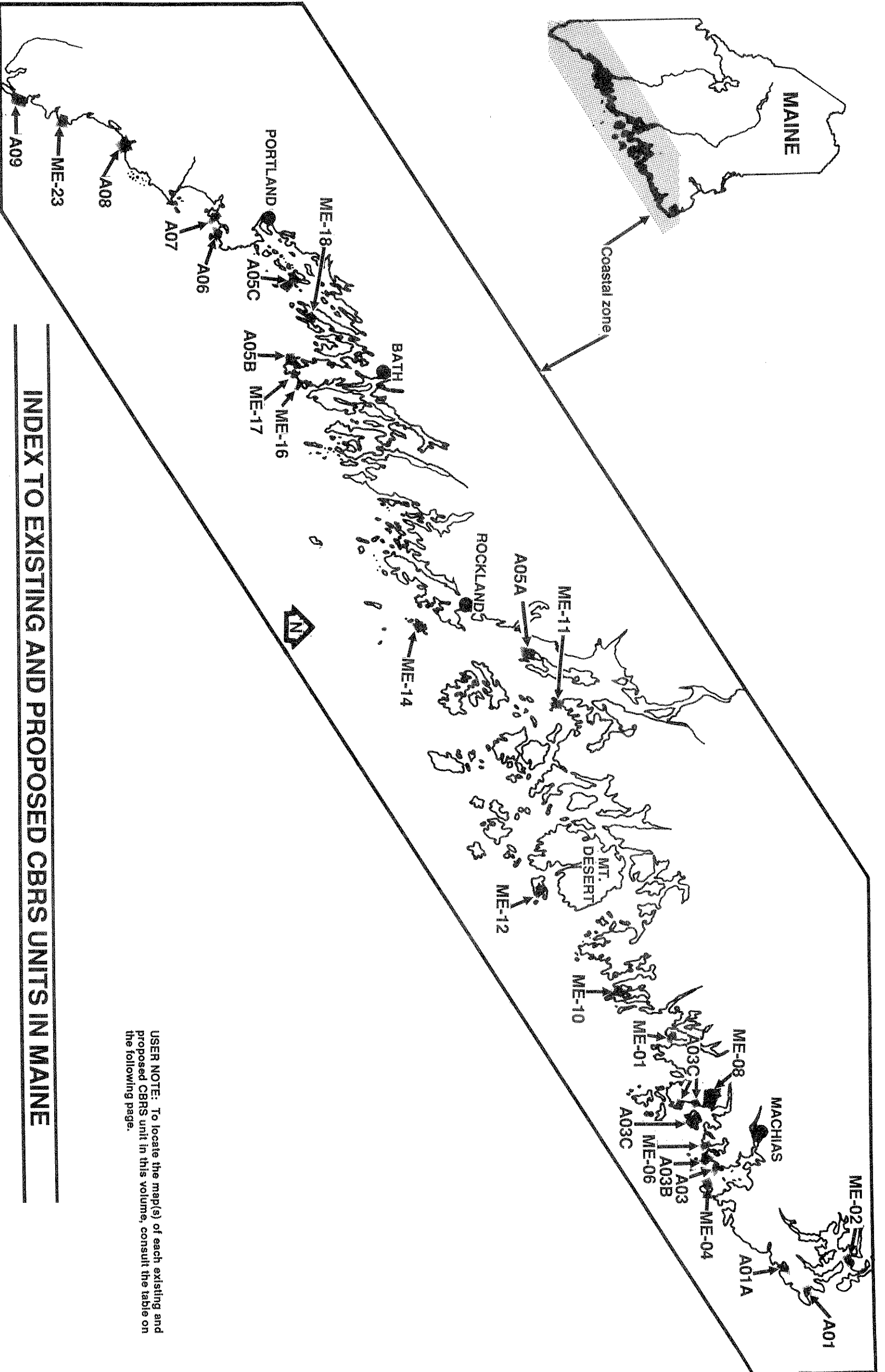
APPENDIX

COMMENTS ON SPECIFIC COASTAL BARRIER AREAS

The National Wildlife Federation, the Natural Resources Defense Council, the Coast Alliance, and the Oceanic Society endorse the inclusion of all undeveloped coastal barriers identified by the Department of Interior in the March 1985 inventory, as well as some additional areas mentioned below. Following are our comments on some of the specific areas.

Maine

Although almost 50% of Maine's population is already located along the coast, Maine's Coastal Advisory Committee predicted in its April 1985 Coastal Priorities Statement that the state's coastal population will increase over three times faster than that of the rest of the state during the next five years, especially along Maine's southern coast. The state of Maine has only 78 miles of sandy beaches so coastal development in Maine has already had serious impacts on the state's coastal resources. By 1977, sixty-two percent of the state's 1,900 acres of sand dunes had been developed and between 1954 and 1964 an astonishing 1,000 acres of coastal marshlands were filled. Clearly further coastal development needs to be discouraged. We strongly support the inclusion of 23 new units from this state into the System and the expansion of units A08 and A09.



USER NOTE: To locate the map(s) of each existing and proposed CBRS unit in this volume, consult the table on the following page.

INDEX TO EXISTING AND PROPOSED CBRS UNITS IN MAINE

MAPS DEPICTING EXISTING AND PROPOSED CBRS UNITS

Unit ID Code	Unit Name	USGS Topographic Map or Map Composite	Page
A01*	Lubec Barriers	Lubec	16
A01A*	Baileys Mistake	West Lubec	18
A03*	Jasper	Machias	23
A03B	Starboard	Roque Bluffs	25
A03C*	Popplestone Beach/Rogue Island	Jonesport	26
A05A*	Seven Hundred Acre Island	Vinalhaven	35
A05B	Head Beach	Small Point	39
A05C*	Jenks Landing/Waldo Point	South Harpswell	41
		Portland East	42
A06	Cape Elizabeth	Prouts Neck	44
A07	Scarborough Beach	Prouts Neck	44
A08	Crescent Surf	Wells	45
A09	Seapoint	Kittery	47
ME-01	Carrying Place Cove	Harrington	28
ME-02*	Birch Point	Eastport	14
ME-04*	Seal Cove	Cross Island	21
ME-06	Bare Cove	Roque Bluffs	25
ME-08	Flake Point	Jonesport	26
ME-10	Over Point	Petit Manan	30
ME-11*	Pond Island	Cape Rosier	33
ME-12*	Thrumcap	Mt. Desert	31
ME-14	Nash Point	Hewett Island	37
ME-16	Hunnewell Beach	Small Point	39
ME-17	Small Point Beach	Small Point	39
ME-18	Stover Point	Orrs Island	40
ME-23	Phillips Cove	York Beach	46

*Public comment summaries and DOI responses follow unit maps.

MAPS DEPICTING OTHERWISE PROTECTED, MILITARY, AND COAST GUARD LANDS ON UNDEVELOPED COASTAL BARRIERS*

USGS Topographic Map or Map Composite	Coastal Barrier Status	Page
Machias Bay	Federal, Military	20
Cross Island	Federal	21
Roque Bluffs	State	25
Jonesport	Coast Guard	26
Bois Bubert	Federal, Local	29
Petit Manan	Federal	30
Boothbay Harbor	State	38
Small Point	State	39
Prouts Neck	State	44
Wells	Federal, Local	45

*These maps are provided for information purposes only. DOI is not recommending the addition of these areas to the CBRS unless they are made available for development that is inconsistent with the CBRA purposes.

MAP KEY

-----	Existing CBRS units
_____	Recommended additions to or deletions from the CBRS
.....	Military, Coast Guard, or otherwise protected, undeveloped coastal barrier
ADD	Area recommended for addition to the CBRS
DELETE	Area recommended for deletion from the CBRS
EXCLUDED	Area excluded from an existing or proposed CBRS unit because it is developed
FEDERAL	Federally protected, undeveloped coastal barrier; for information only
STATE	State protected, undeveloped coastal coastal barrier; for information only
LOCAL	Locally protected, undeveloped coastal barrier; for information only
PRIVATE	Privately protected, undeveloped coastal barrier; for information only
MILITARY	Undeveloped coastal barrier owned by the military; for information only
COAST GUARD	Undeveloped coastal barrier owned by the Coast Guard; for information only

Maps are arranged in geographic order from north to south.



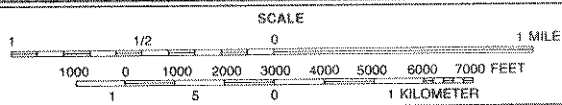
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



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Washington, D.C. 20240

QUADRANGLE
EASTPORT
MAINE



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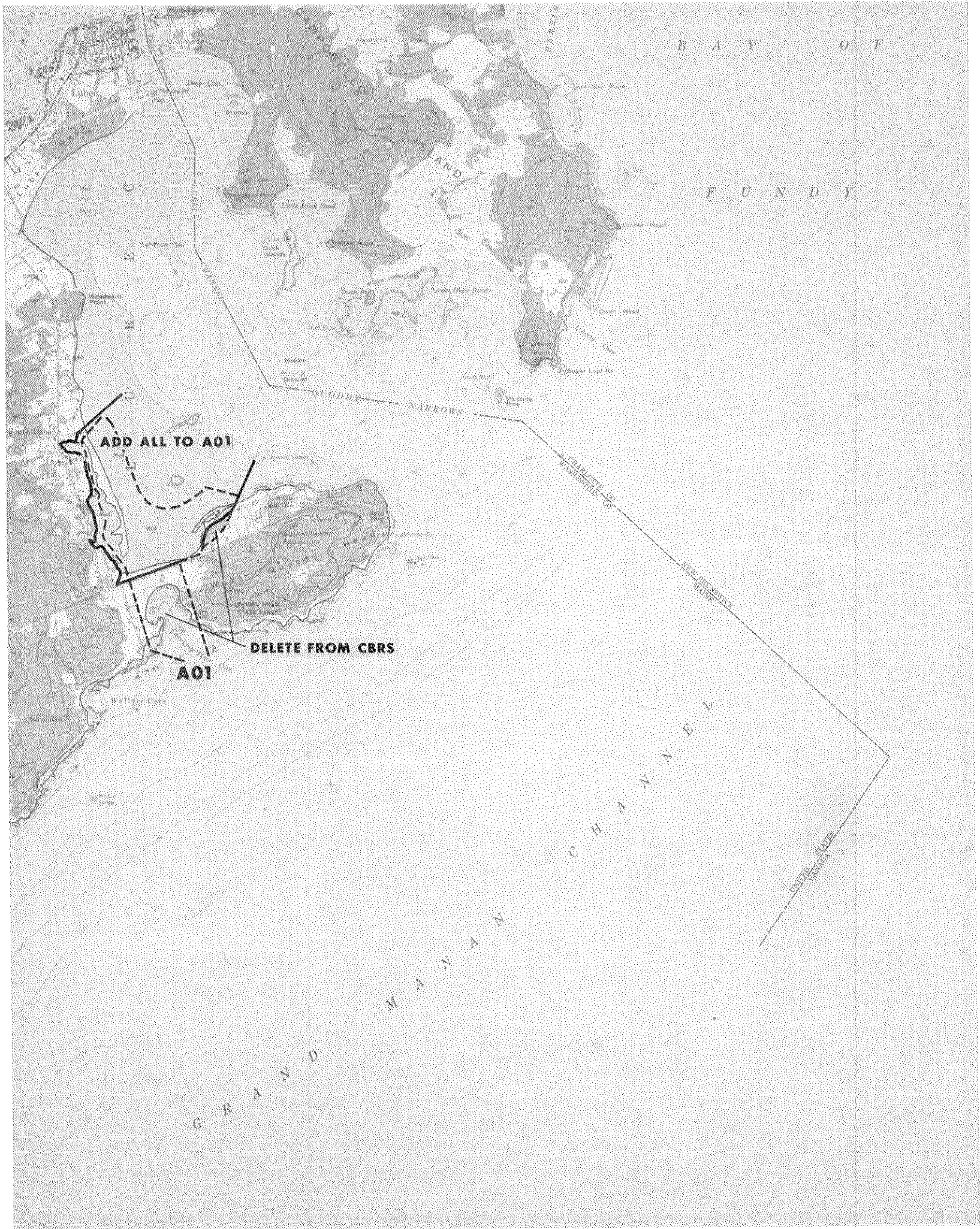
Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

ME-02 - BIRCH POINT

State Position: The State of Maine requested that the 1987 draft delineations of ME-02 be expanded to include all of Birch Point in the proposed CBRS unit.

DOI Recommendation: The DOI recommends adding all of Birch Point to the CBRS.

Response: After closer examination of the Birch Point area, the DOI agrees the entire Point qualifies as a coastal barrier.



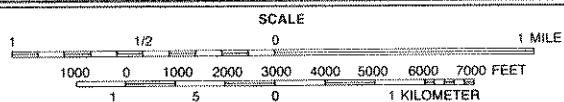
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Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
LUBEC
MAINE



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Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

A01 - LUBEC BARRIERS

State Position: The State of Maine requested the deletion of the upland heath between Quoddy Head and the mainland from the existing CBRS unit because it is not a barrier. The State also requested that the salt marshes associated with Lubec spit be added to the CBRS unit.

Response: The DOI has examined the isthmus between Quoddy Head and the mainland and determined it is not a tombolo, but an upland heath, therefore, it does not qualify as a coastal barrier according to DOI definitions.

The Lubec spit salt marshes fully qualify for addition to the CBRS as associated aquatic habitat.

DOI Recommendation: The DOI recommends deleting the isthmus between Quoddy Head and the mainland from the existing CBRS unit. The DOI also recommends adding the Lubec spit salt marshes to the CBRS unit as suggested by the State. The recommended modification of A01 changes the orientation of the unit from Grand Manan Channel to Quoddy Narrows.



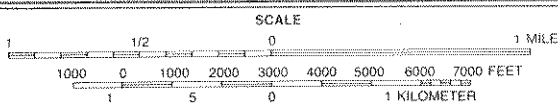
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WEST LUBEC
MAINE



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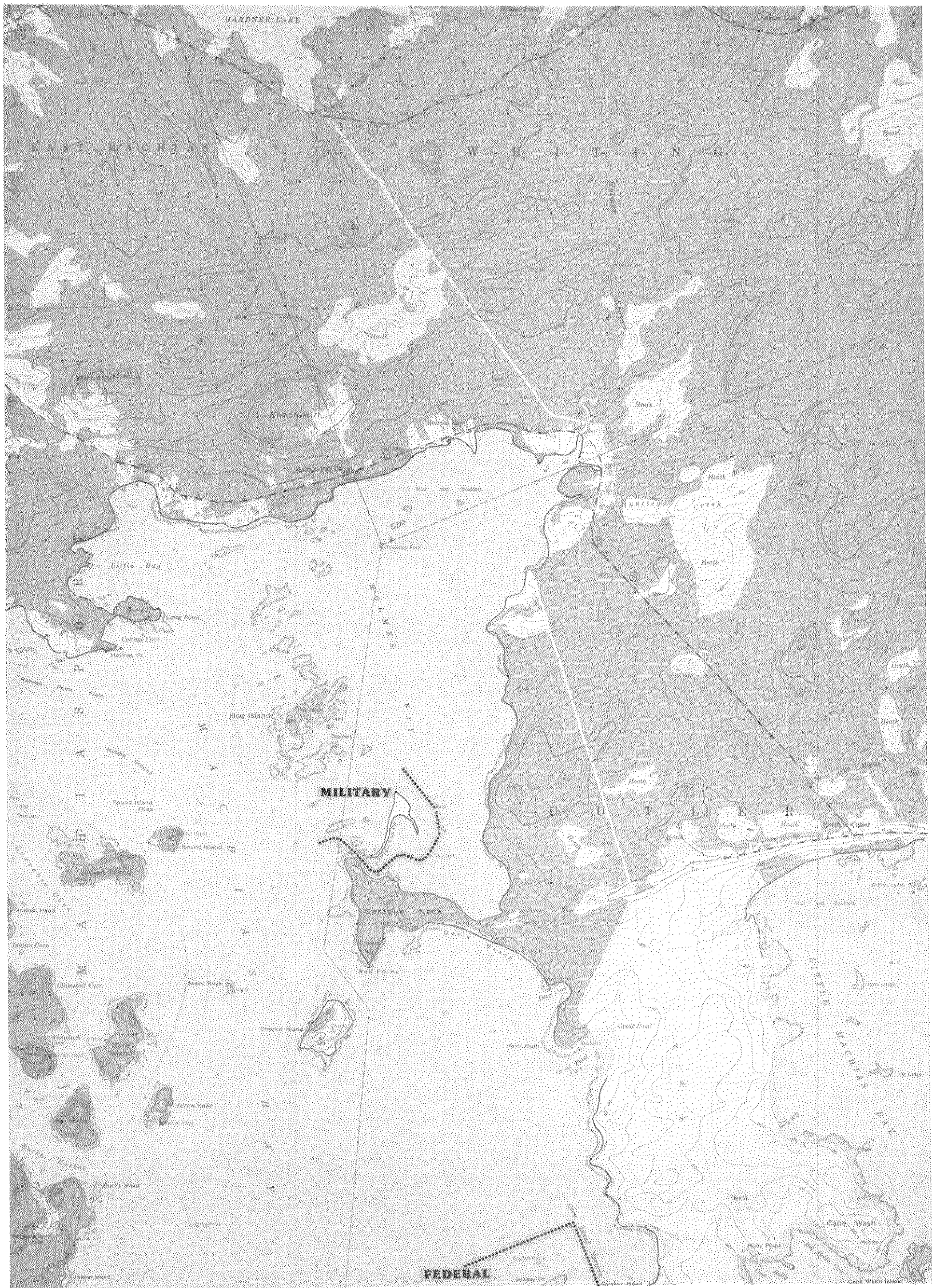
A01A - BAILEYS MISTAKE

State Position: The State of Maine requested that the eastern upland portion of A01 be deleted from the CBRS unit because it is not a coastal barrier.

Response: The eastern portion of the existing CBRS unit is primarily upland with

some intertidal bedrock. It does not qualify as a coastal barrier under DOI definitions.

DOI Recommendation: The DOI recommends deleting the eastern portion of the existing unit from the CBRS.



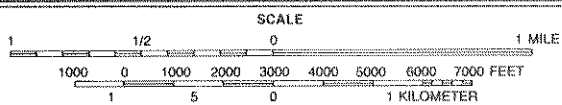
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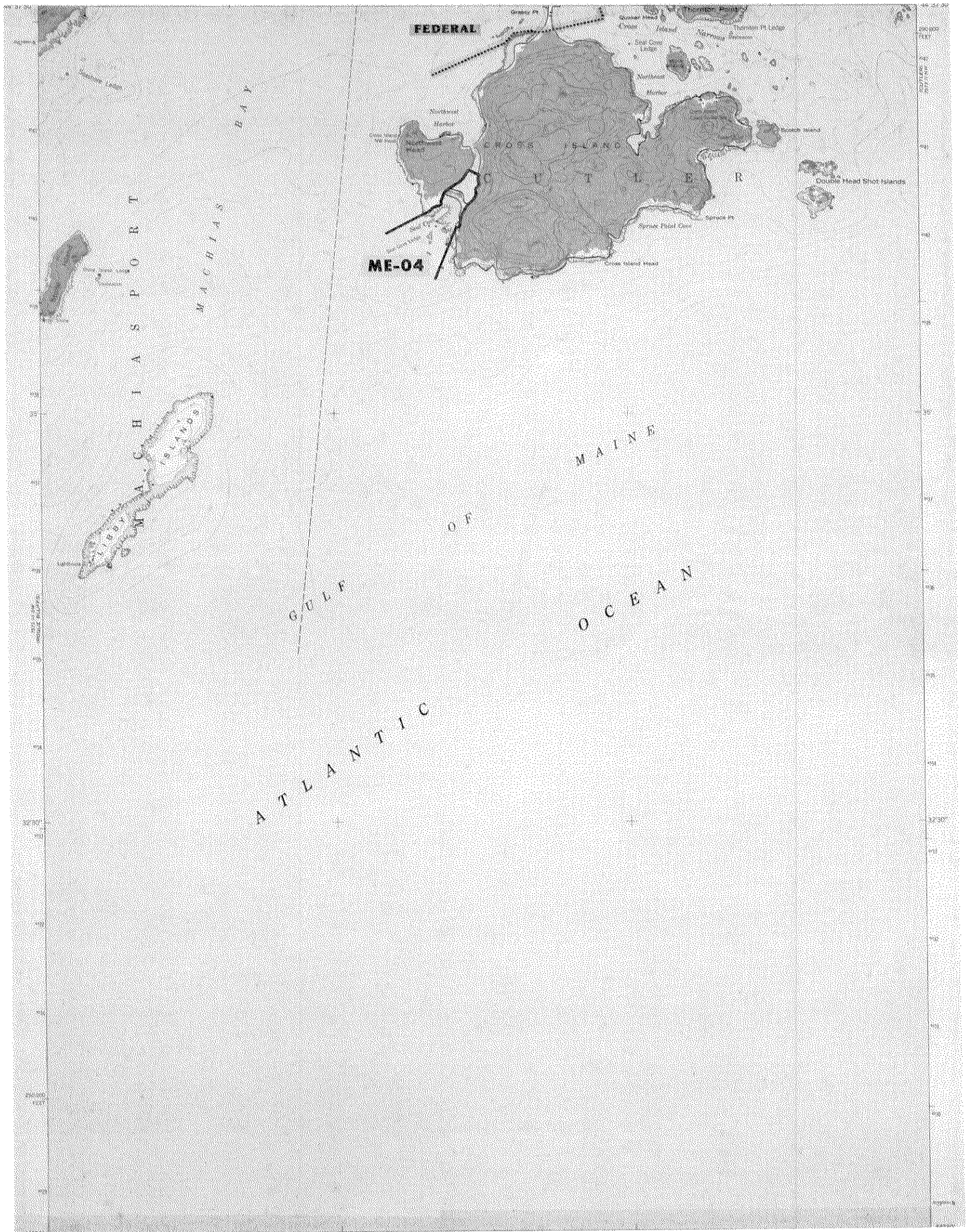
QUADRANGLE
MACHIAS BAY
MAINE



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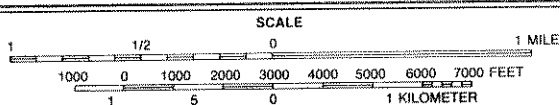
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QUADRANGLE
CROSS ISLAND
MAINE



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ME-04 SEAL COVE

State Position: The State of Maine requested that the 1987 draft delineations of ME-04 be revised to include Grassy Point in the proposed unit and to exclude a non-barrier, upland area from the unit.

Response: Grassy Point is otherwise protected; it is part of a National Wildlife Refuge. The 1987 draft delineation of ME-04

did include a non-barrier, upland area which does not qualify for addition to the CBRS.

DOI Recommendation: The DOI recommends adding ME-04 to the CBRS. The DOI has revised the recommended boundaries of the proposed unit from those proposed in the 1987 draft report to exclude the non-barrier, upland area.



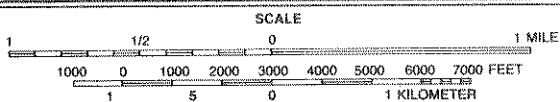
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MACHIAS
MAINE



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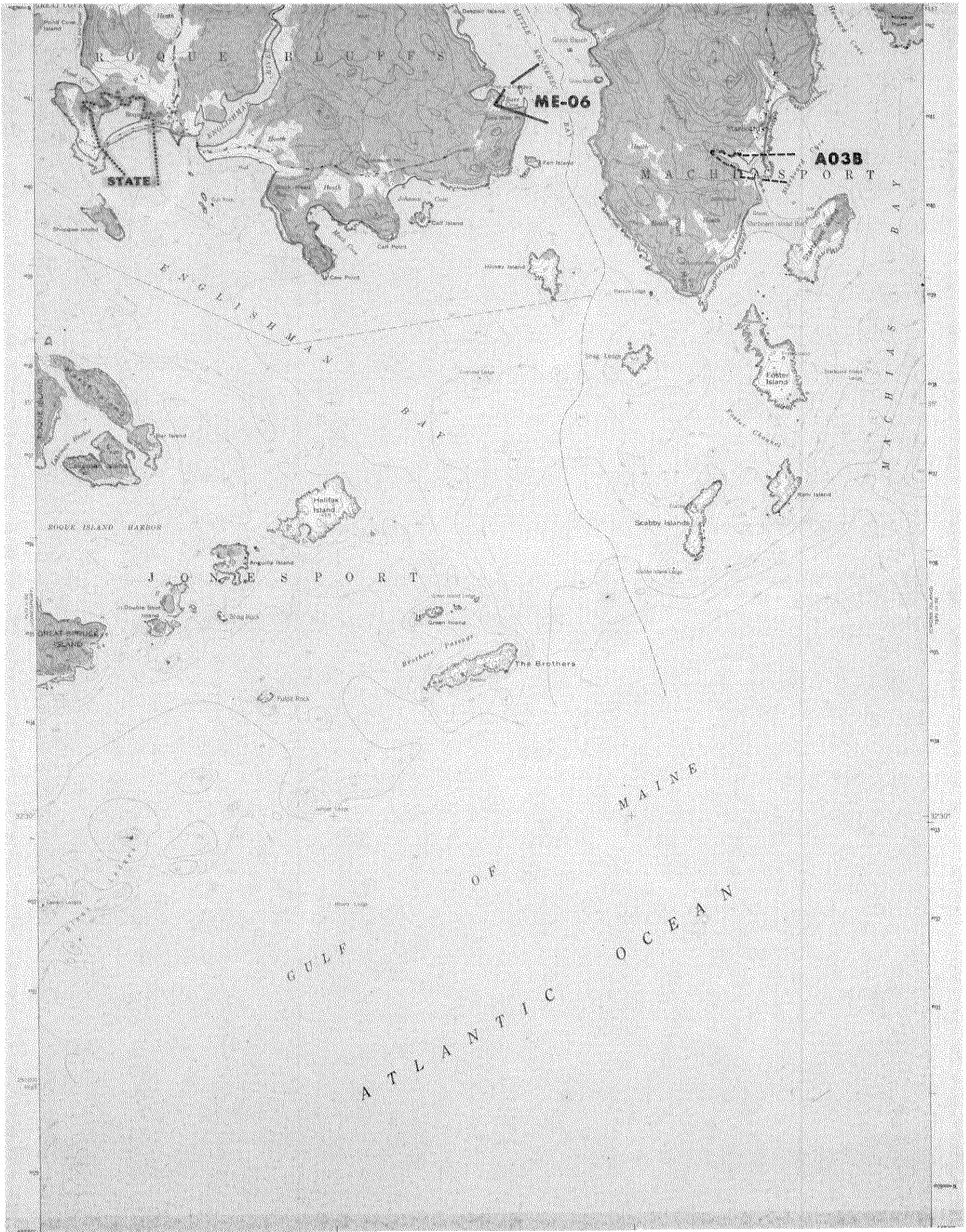
A03 - JASPER

State Position: The State of Maine requested the addition of the adjacent barrier beach and associated lagoon to the west to the existing CBRS unit.

Response: In 1985, the DOI was of the mistaken impression that a headland was present along the coast which would disqualify the

addition of the area to the west. Subsequent closer examination has revealed that this area fully meets DOI criteria for inclusion in the CBRS.

DOI Recommendation: The DOI recommends adding the adjacent barrier beach and lagoon to the west to the existing CBRS unit.



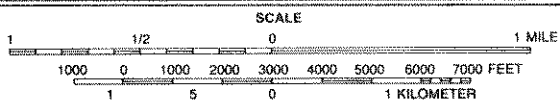
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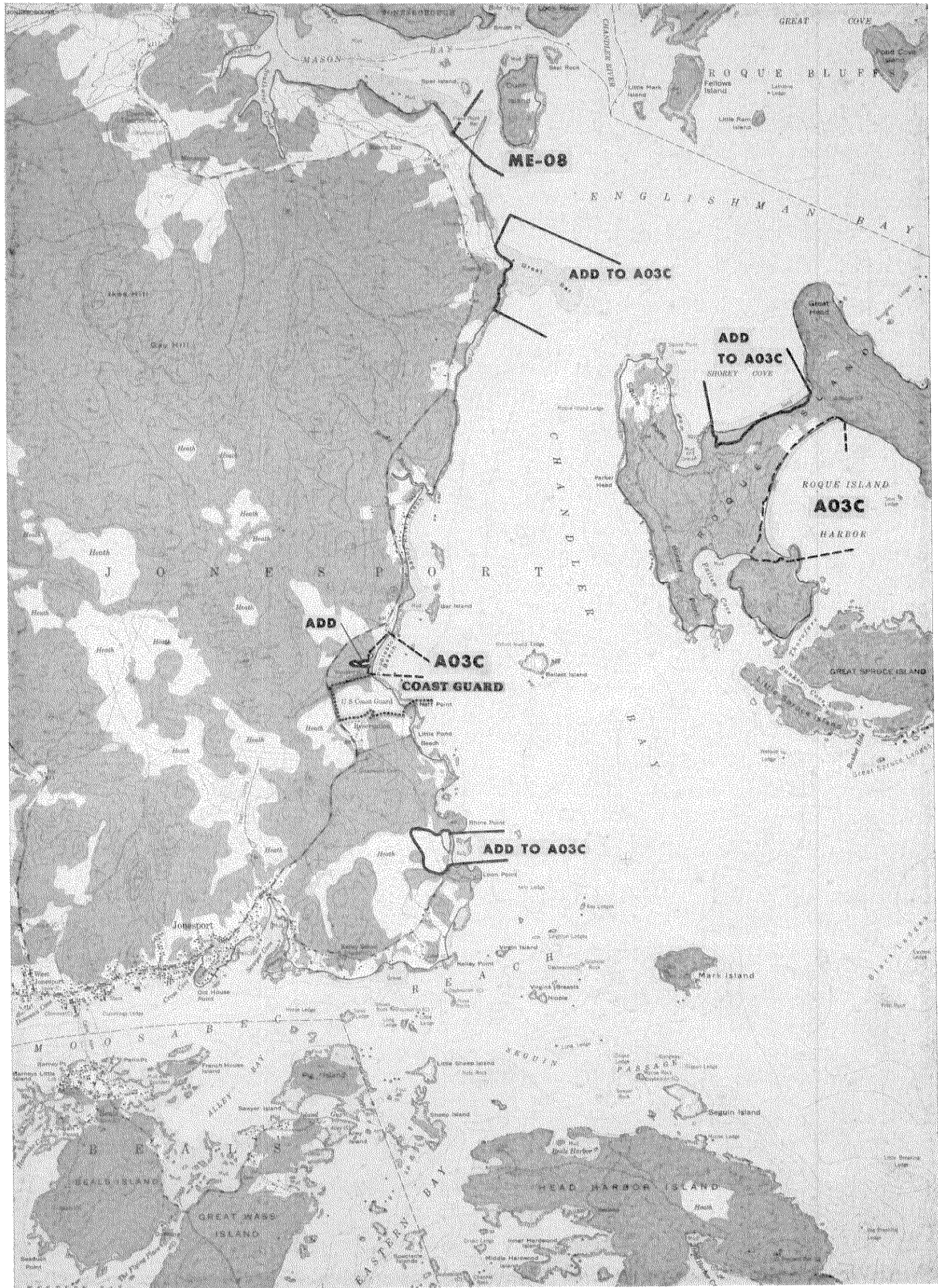
QUADRANGLE
ROQUE BLUFFS
MAINE



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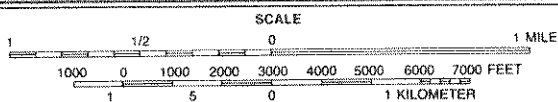
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JONESPORT
MAINE



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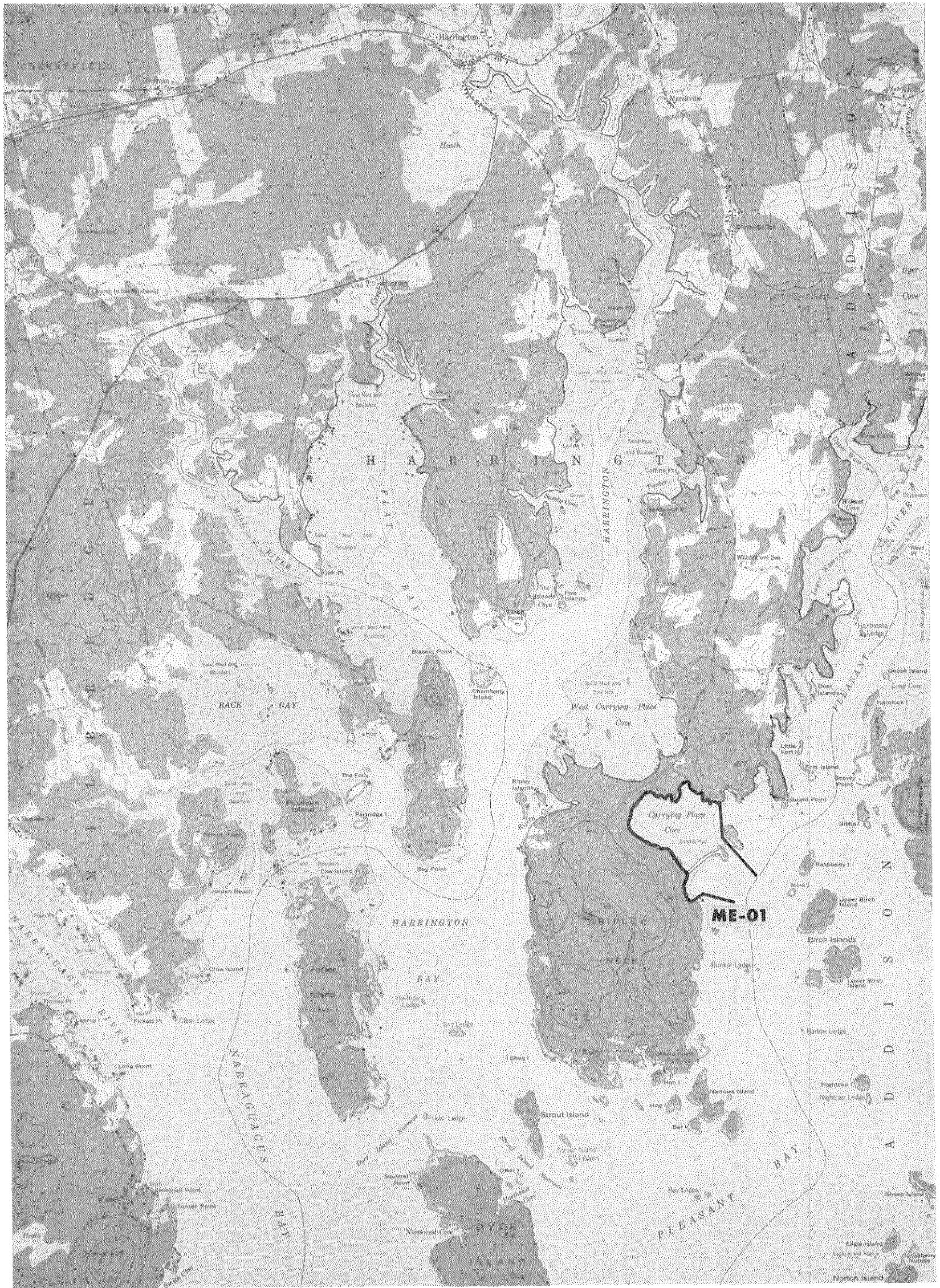
Base Map is the U.S. Geological Survey 1:24,000 scale quadrangle.

A03C - POPPLESTONE BEACH/ROQUE ISLAND

State Position: The State of Maine requested the addition of three small nearby barriers to the existing CBRS unit.

DOI Recommendation: The DOI recommends adding the three nearby barriers to the existing CBRS unit.

Response: All three nearby barriers are geologically similar to the existing unit and fully qualify for addition to the CBRS.



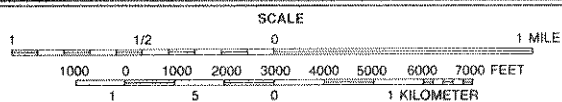
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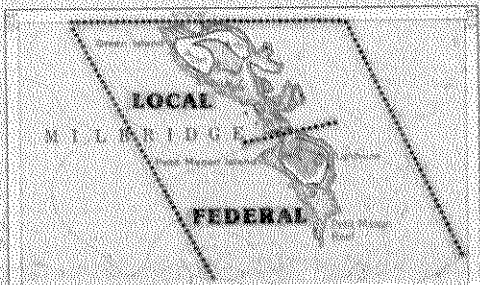
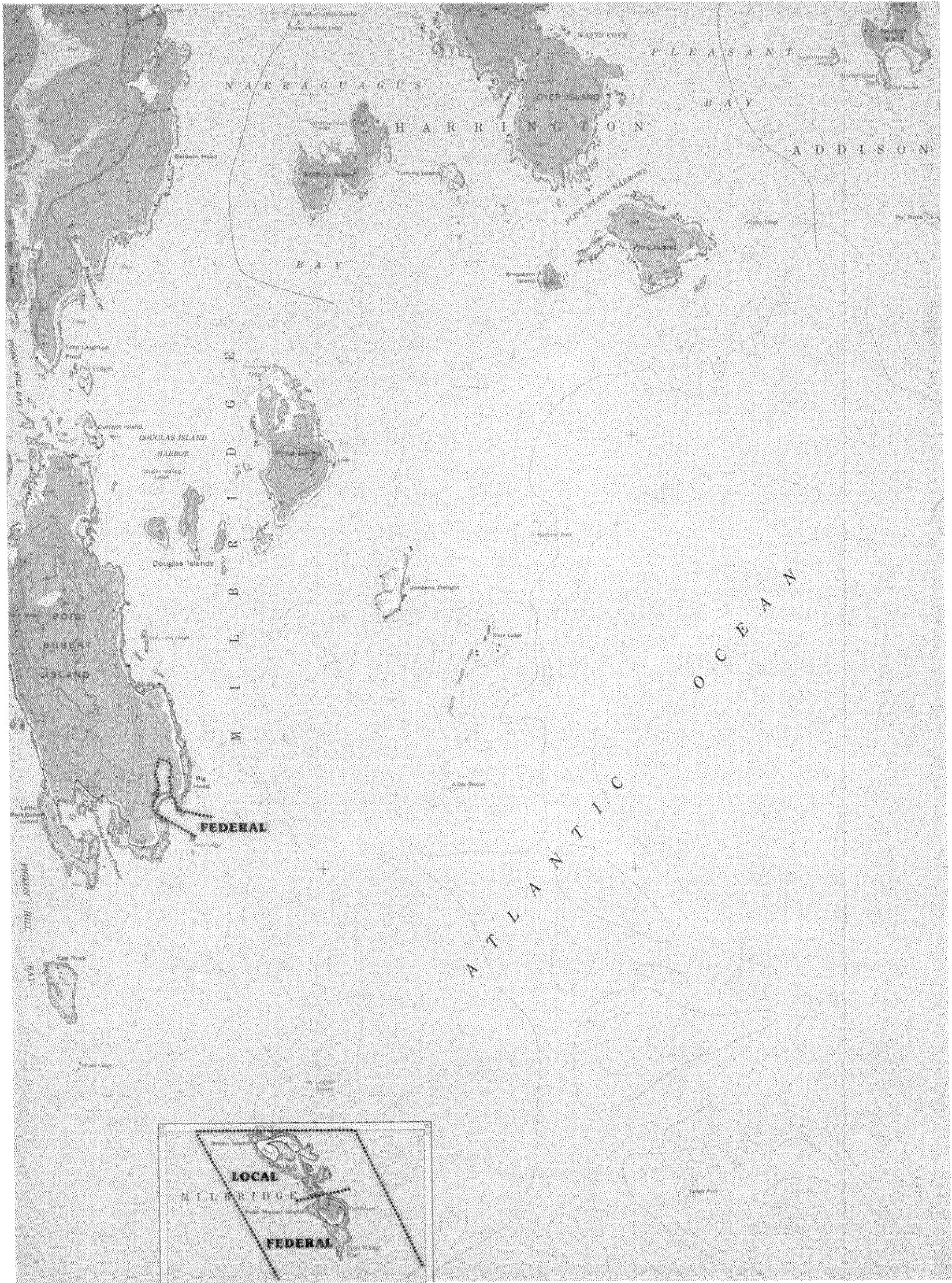
QUADRANGLE
HARRINGTON
MAINE



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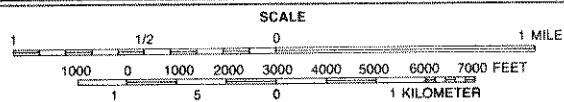
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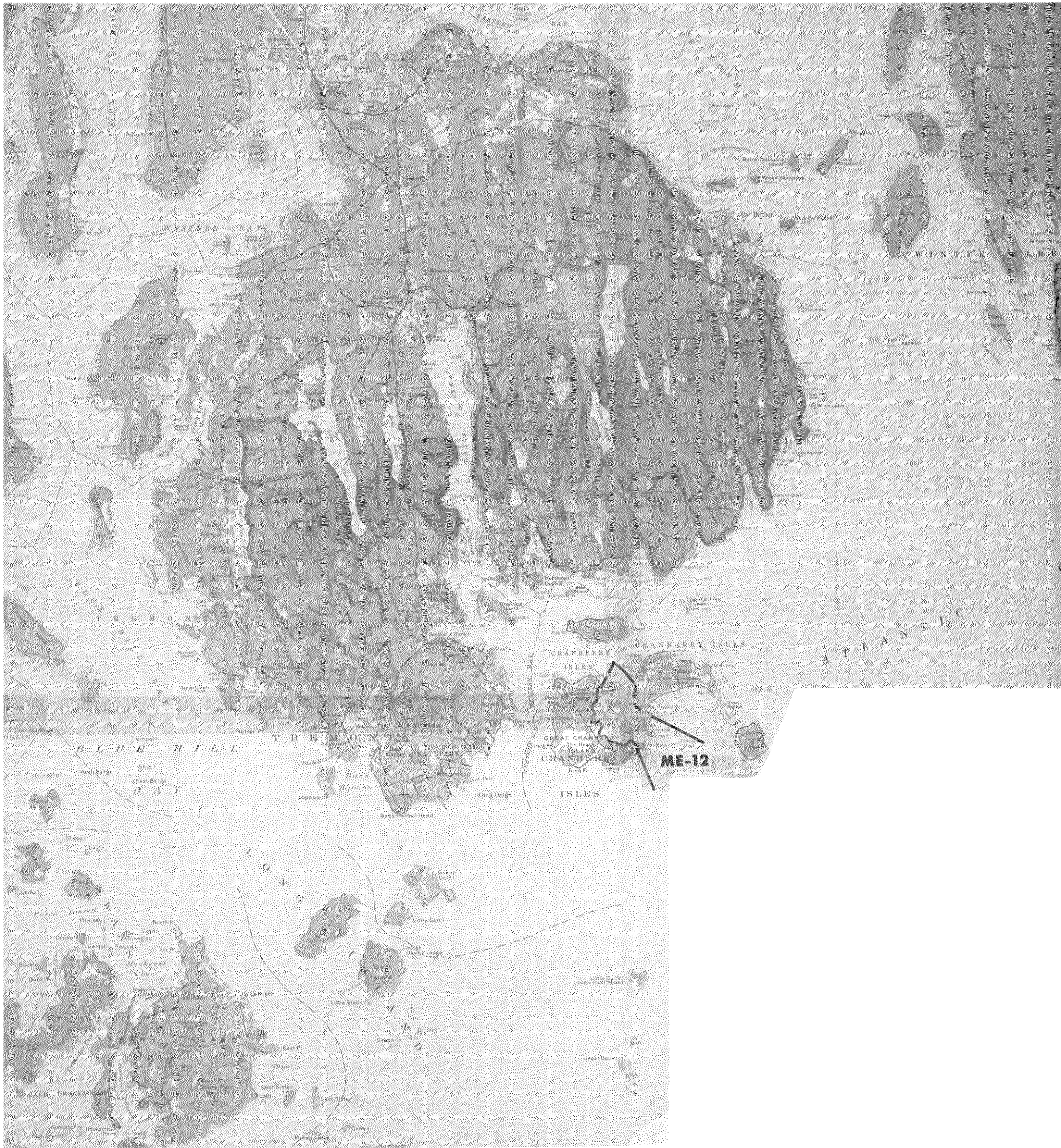
QUADRANGLE
BOIS BUBERT
MAINE



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QUADRANGLE
MOUNT DESERT
MAINE



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Base Map is the U.S. Geological Survey 1:62,500 scale quadrangle.

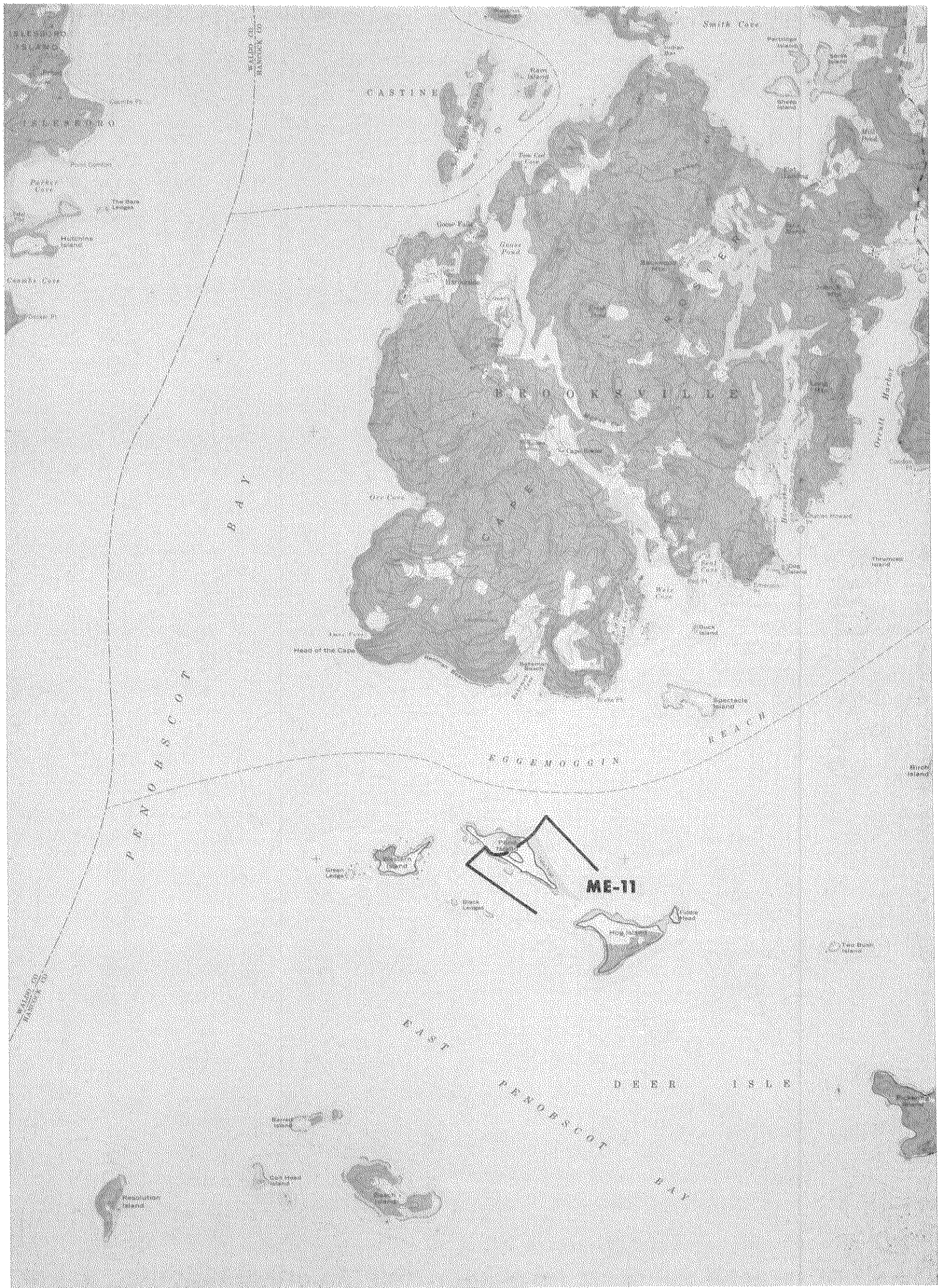
ME-12 THRUMCAP

State Response: The State of Maine requested that the 1987 draft delineations of ME-12 be revised to include the spits at Bass Harbor in the proposed unit.

Response: The spits at Bass Harbor do not qualify as undeveloped coastal barriers under

DOI criteria, therefore, they are ineligible for addition to the CBRS.

DOI Recommendation: The DOI recommends that ME-12 be added to the CBRS as delineated here to exclude the spits of Bass Harbor.



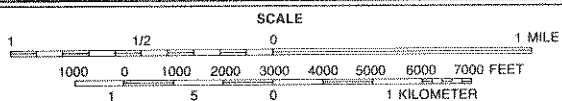
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QUADRANGLE
CAPE ROSIER
MAINE



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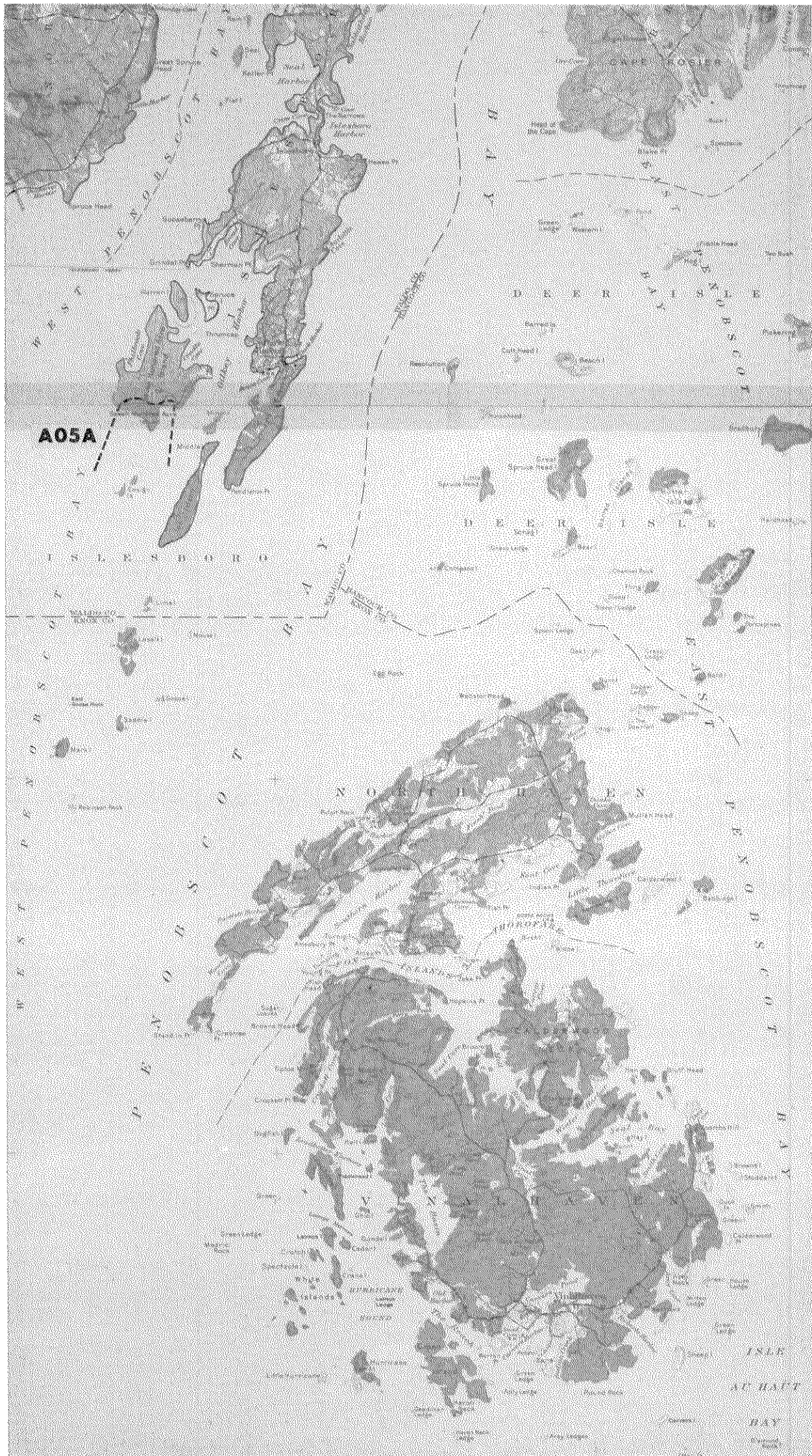
ME-11 POND ISLAND

State Position: The State of Maine requested that the 1987 draft delineations of ME-11 be revised to include Pickering Island in the proposed unit.

Response: Pickering Island does not qualify

as a coastal barrier according to DOI definitions.

DOI Recommendation: The DOI recommends adding ME-11 to the CBRS as delineated here to exclude Pickering Island.



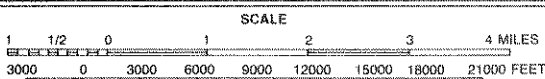
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QUADRANGLE
VINALHAVEN
MAINE



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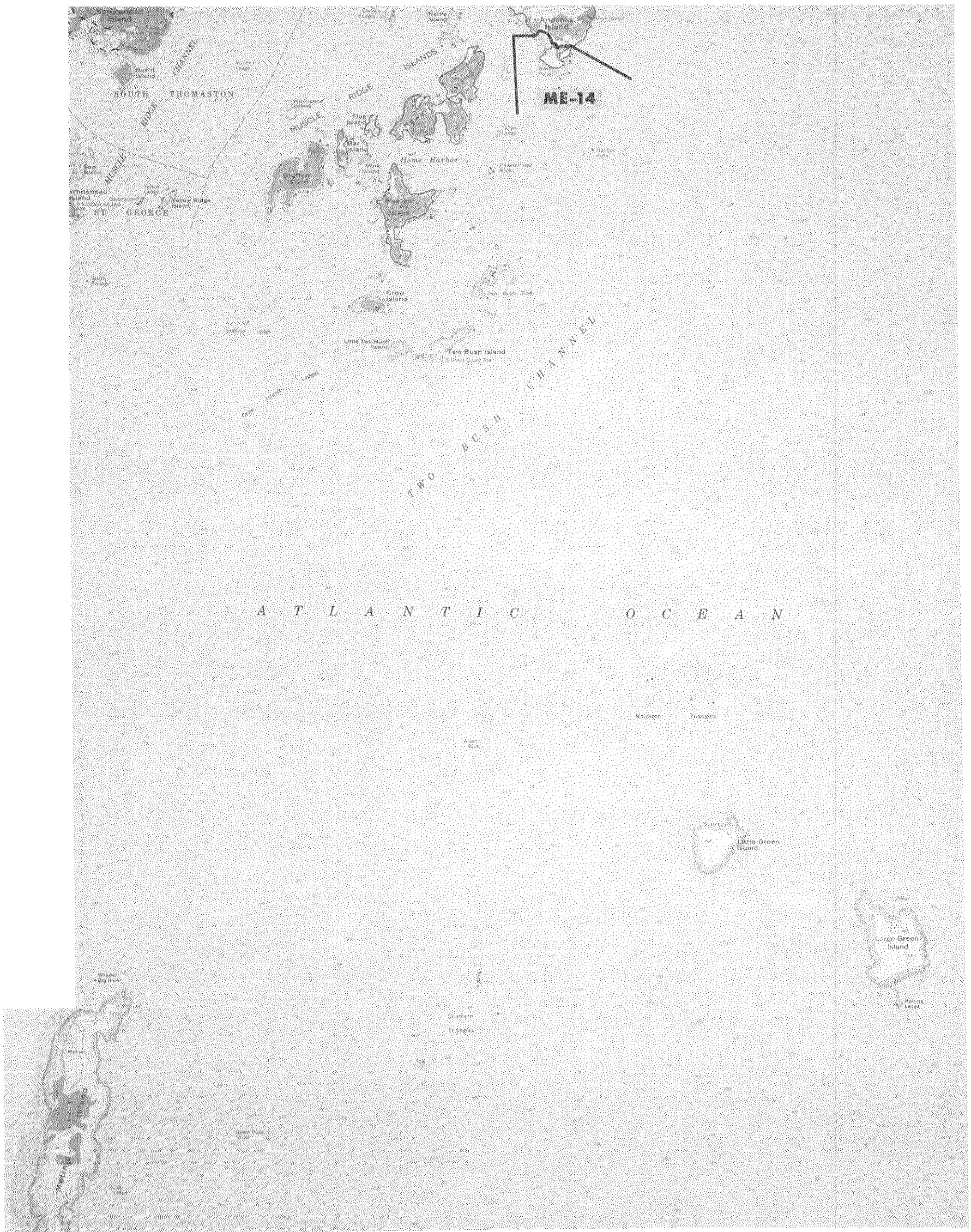
A05A - SEVEN HUNDRED ACRE ISLAND

State Position: The State of Maine requested the addition of Philbrook Cove to the existing CBRS unit.

Response: An open water body cannot be added to the CBRS under DOI criteria unless it is protected by an undeveloped coastal barrier.

Philbrook Cove is not protected by a coastal barrier, therefore, it is ineligible for addition to the CBRS.

DOI Recommendation: The DOI recommends no change in the boundaries of the existing CBRS unit.



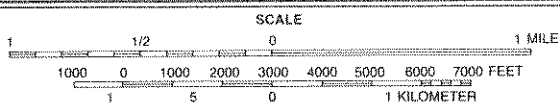
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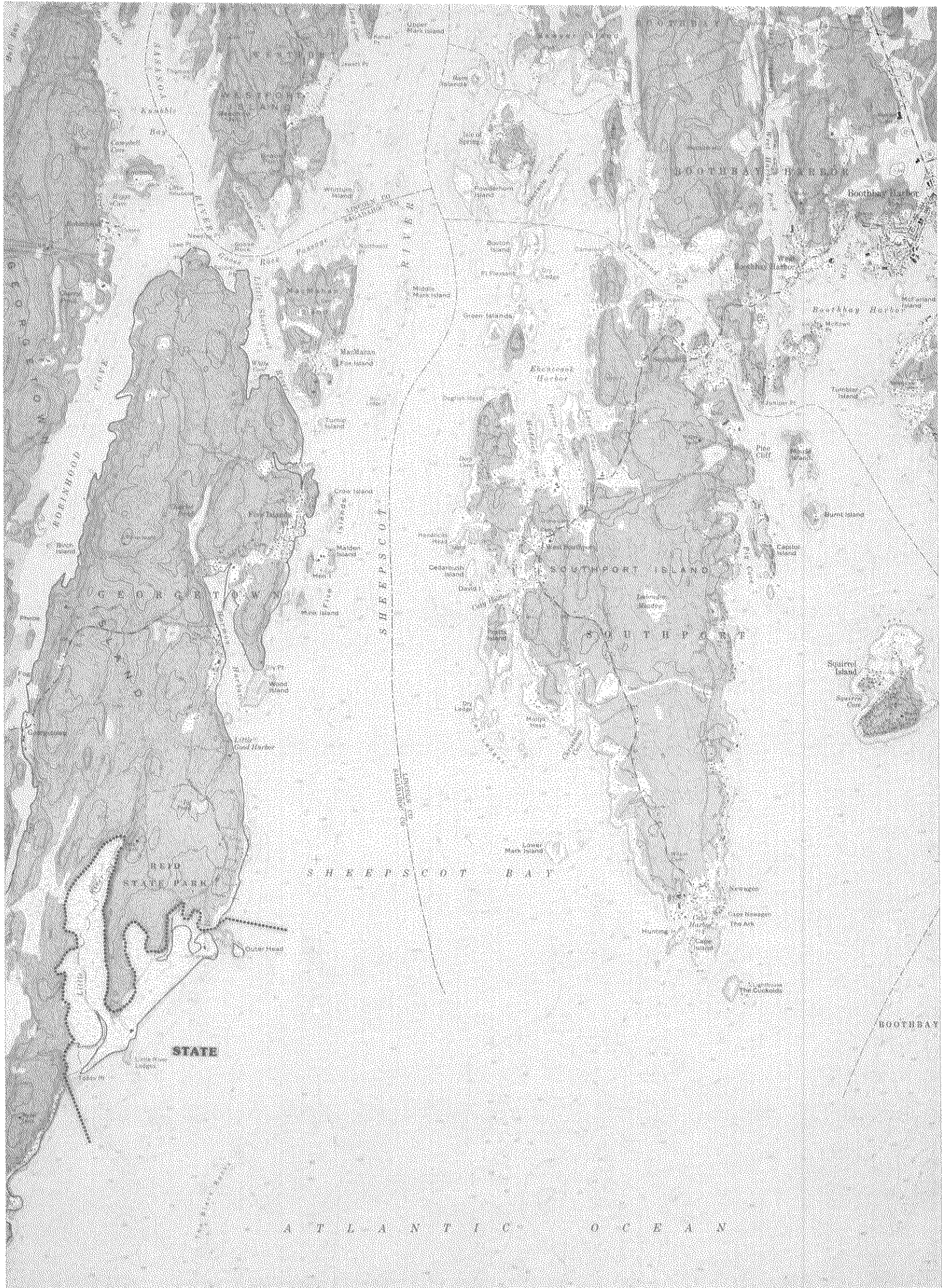
QUADRANGLE
HEWETT ISLAND
MAINE



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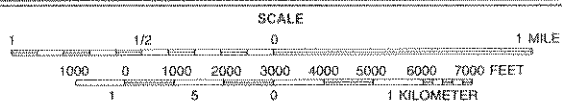
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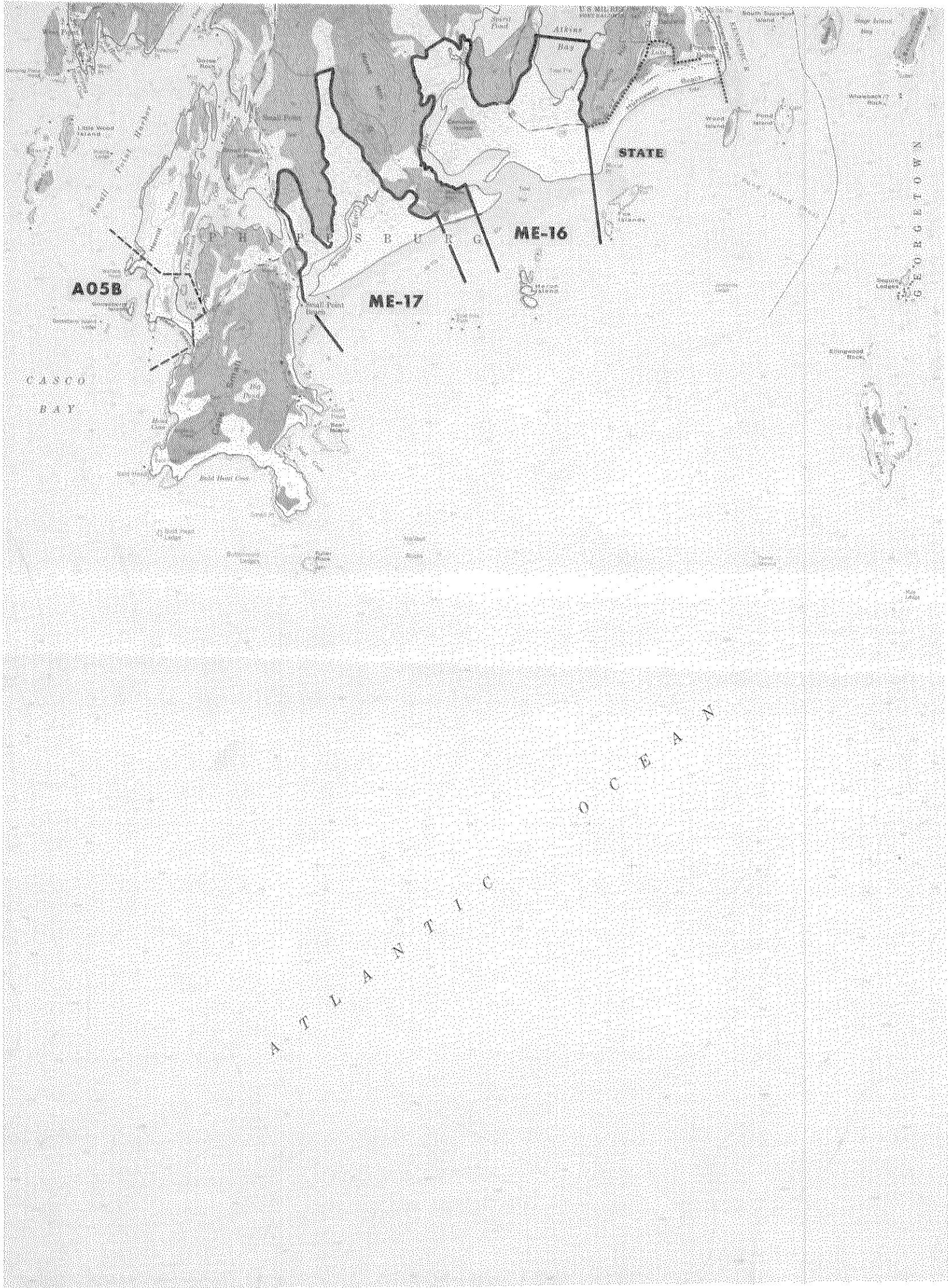
QUADRANGLE
BOOTHBAY HARBOR
MAINE



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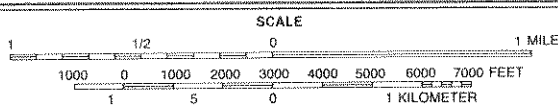
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QUADRANGLE
SMALL POINT
MAINE



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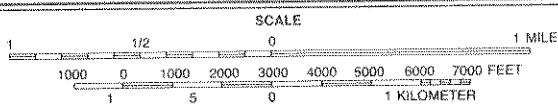
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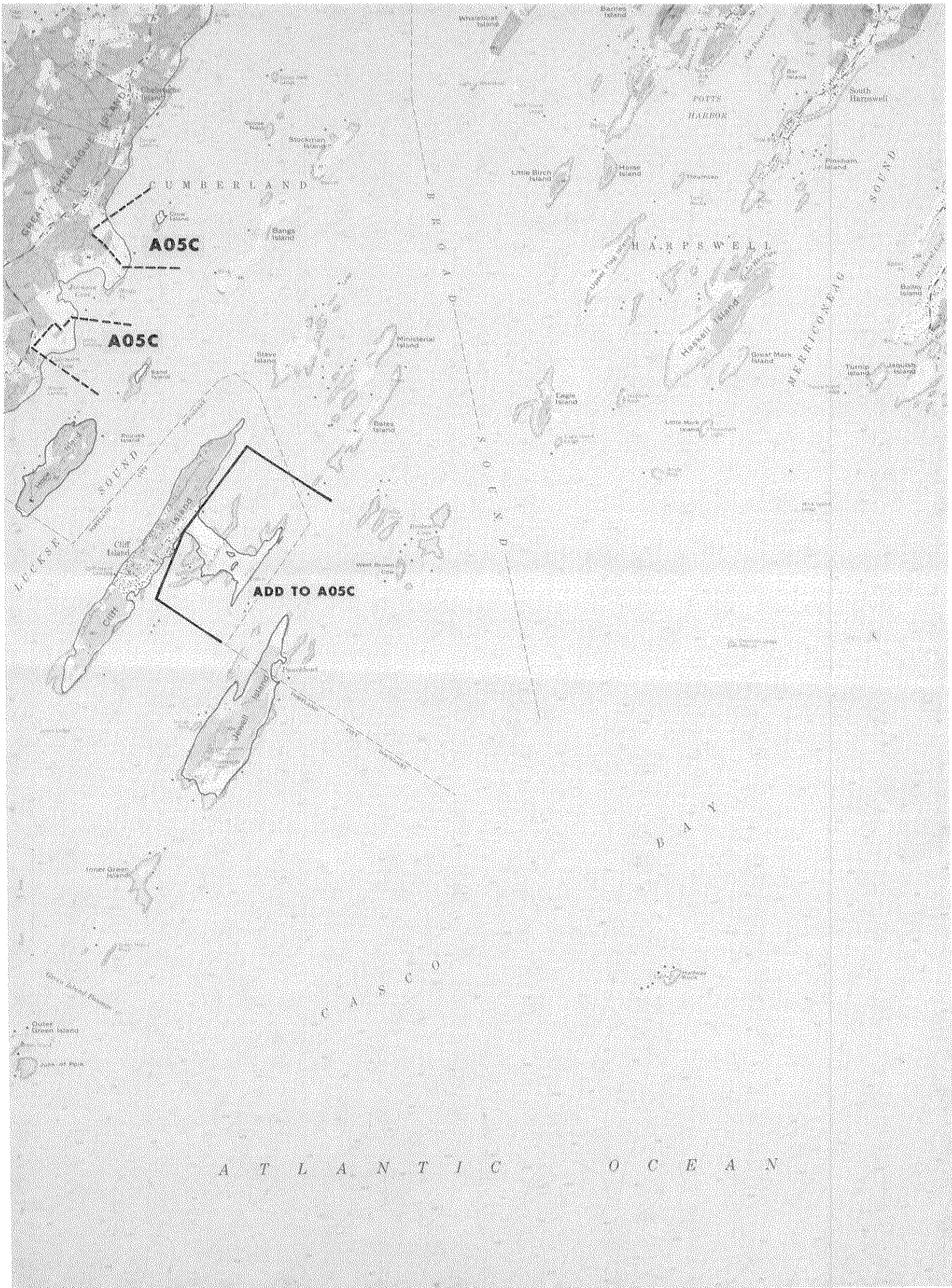
QUADRANGLE
ORRS ISLAND
MAINE



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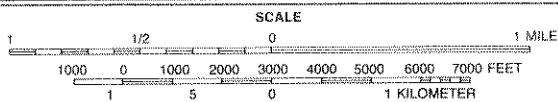
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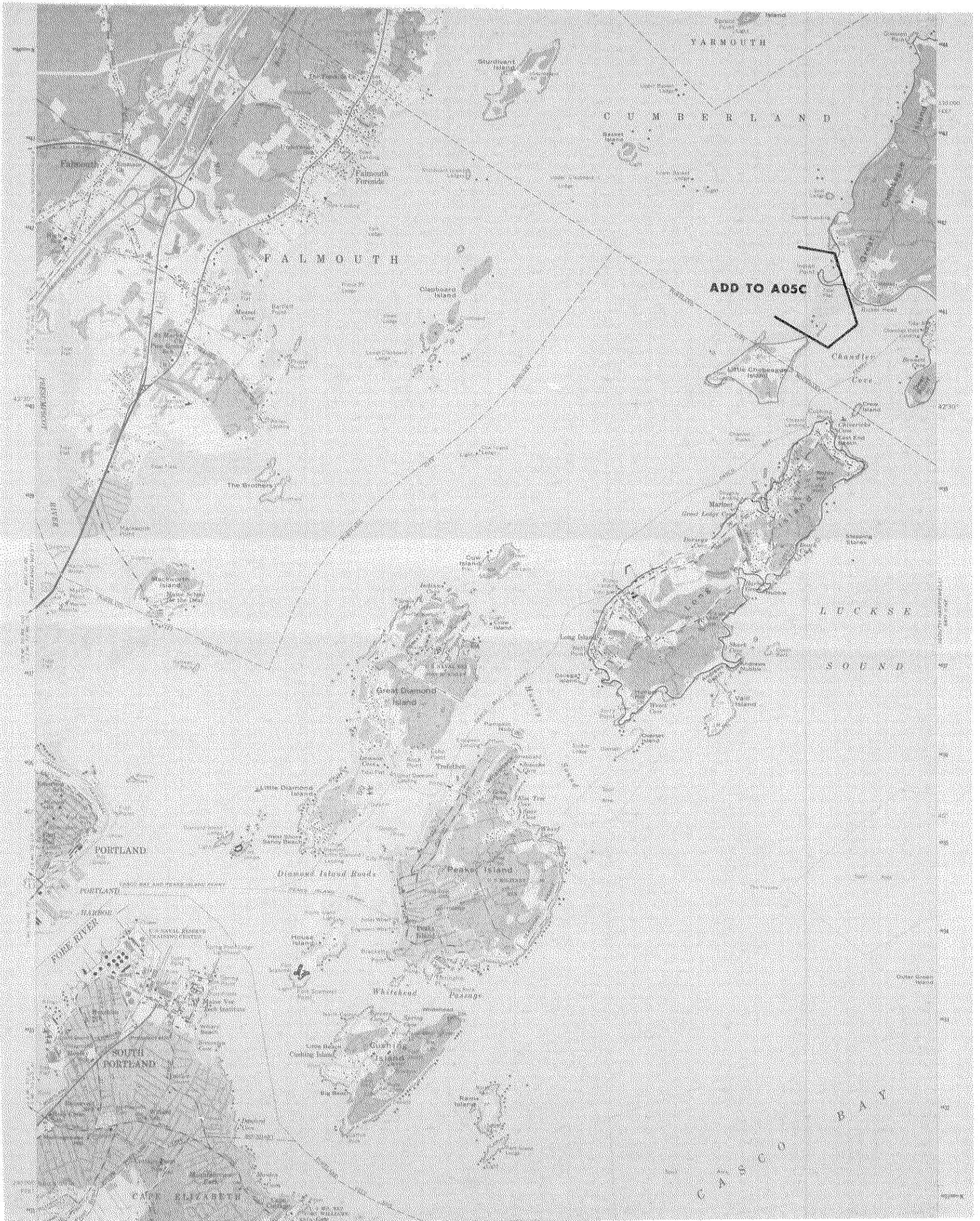
QUADRANGLE
SOUTH HARPSWELL
MAINE



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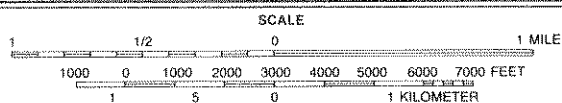
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QUADRANGLE
PORTLAND EAST
MAINE



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A05C - JENKS LANDING/WALDO POINT

State Position: The State of Maine requested the addition of the Cliff Island tombolos and Indian Point to the existing CBRS unit.

DOI Recommendation: The DOI recommends adding the Cliff Island tombolos and Indian Point to the existing CBRS unit.

Response: The Cliff Island tombolos and Indian Point fully qualify for addition to the CBRS.



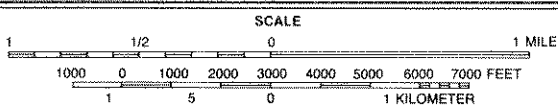
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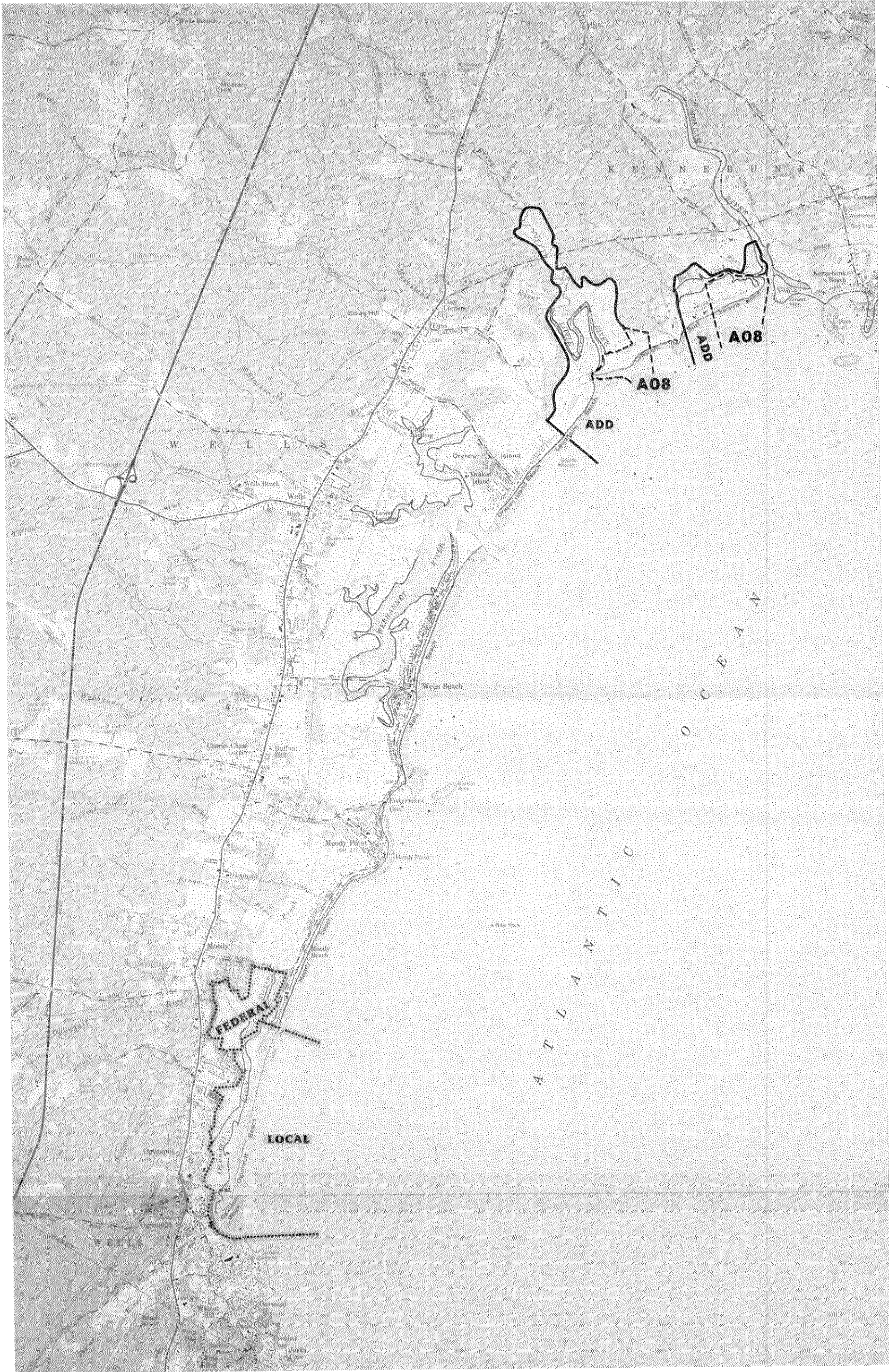
QUADRANGLE
PROUTS NECK
MAINE



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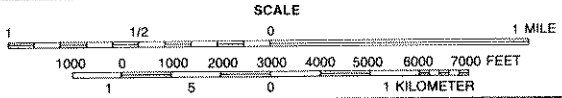
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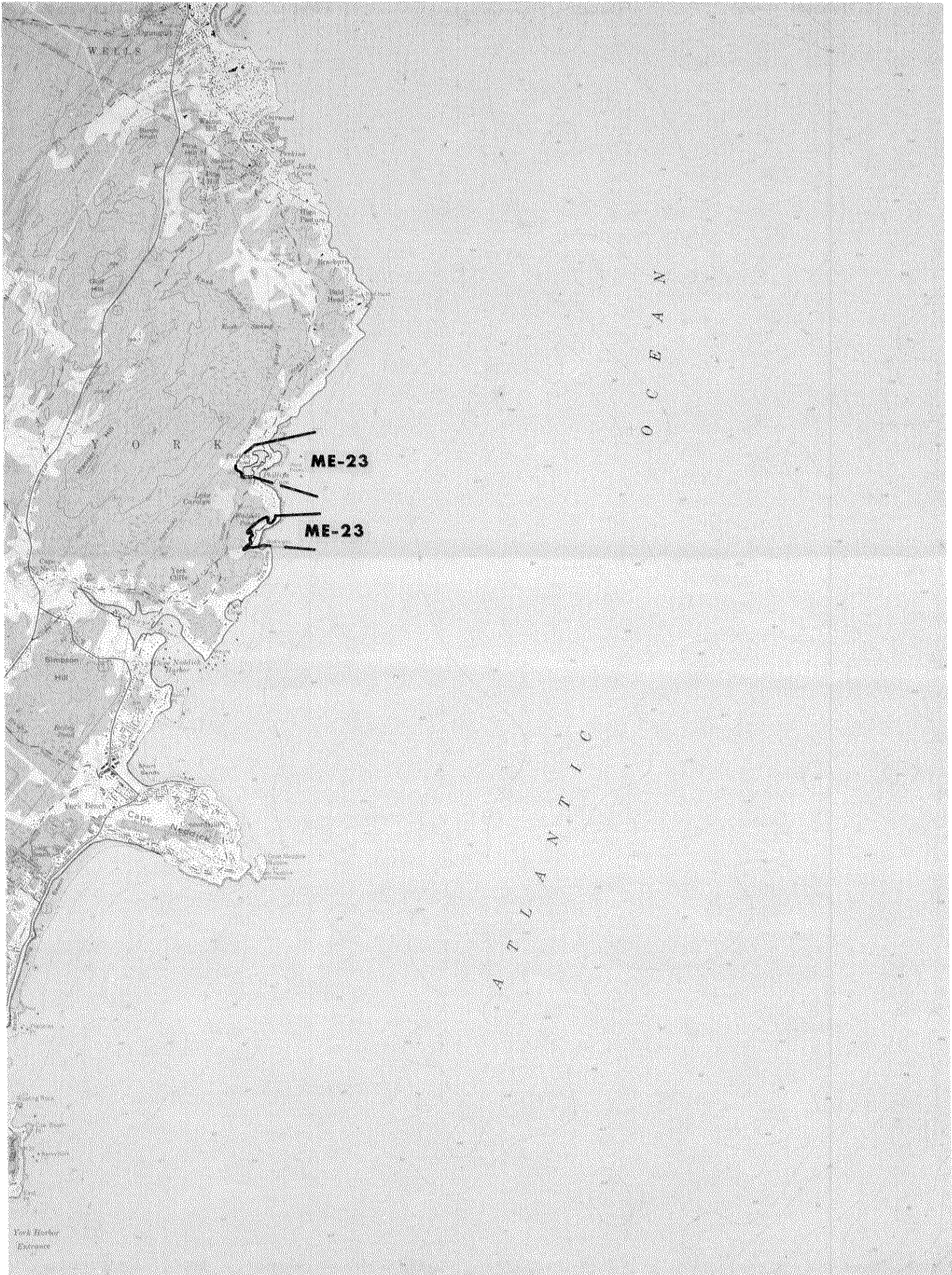
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QUADRANGLE
WELLS
MAINE



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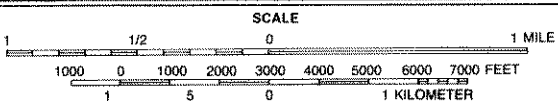
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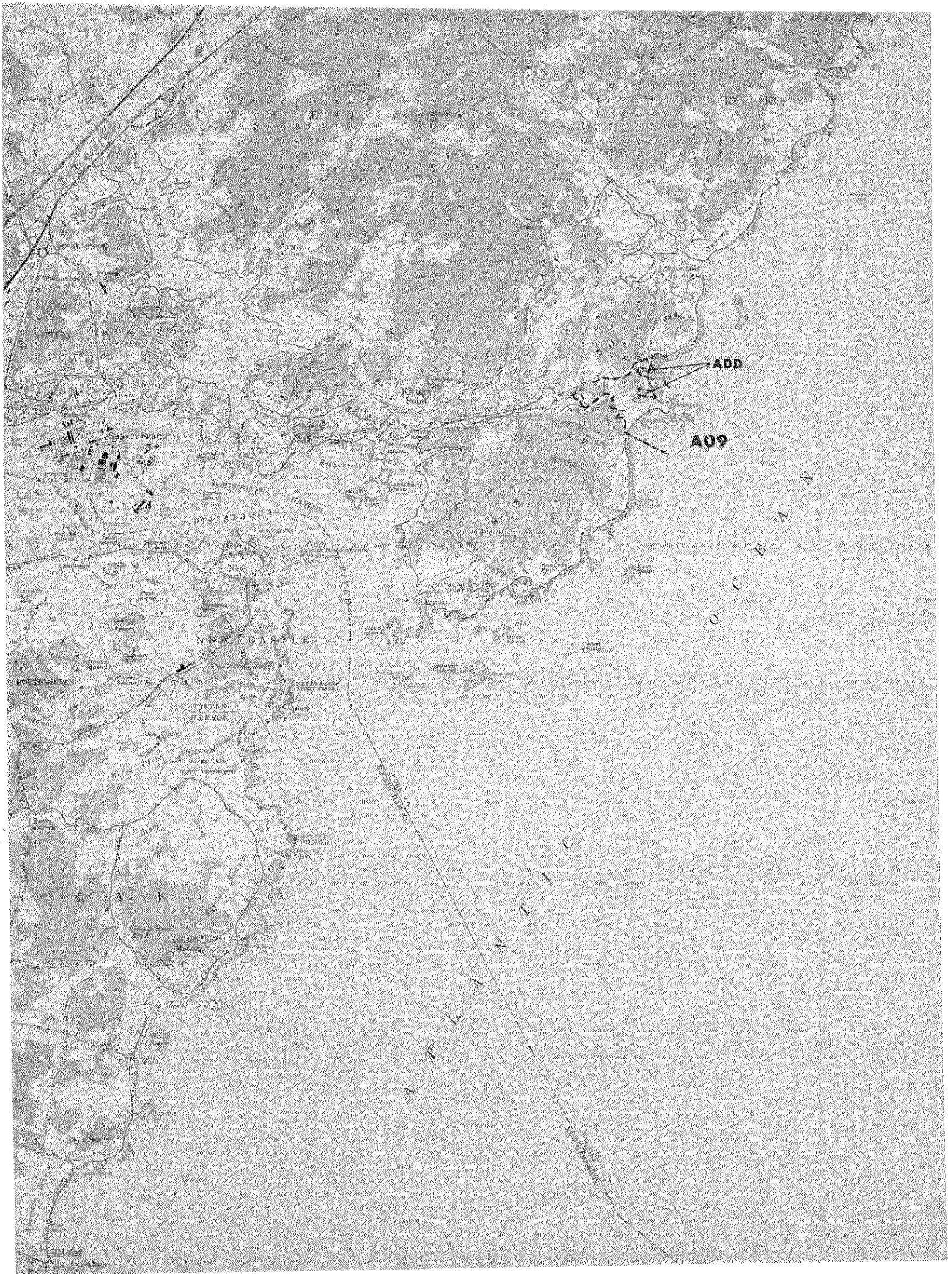
QUADRANGLE
YORK BEACH
MAINE



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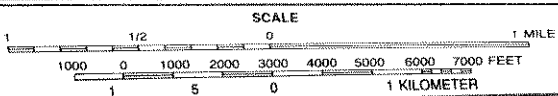
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QUADRANGLE
KITTERY
MAINE



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