

REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

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



**VOLUME 5
CONNECTICUT**

U.S. Department of the Interior



REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

VOLUME 5

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

CONNECTICUT

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

TABLE OF CONTENTS

	<u>Page</u>
Introduction.....	1
Background.....	1
Coastal Resource Management.....	2
Existing CBRS Units.....	3
Table: CBRS Units Established by Congress, 1982.....	3
Recommended Additions and Modifications.....	4
Table: Summary of Recommendations.....	5
State Comment Letter.....	7
Other General Comment Letters Concerning Connecticut.....	9
Index to Existing and Proposed CBRS Units.....	12
Table: Maps Depicting Existing and Proposed CBRS Units.....	13
Table: Maps Depicting Otherwise Protected, Military, and Coast Guard Lands on Undeveloped Coastal Barriers.....	13
Map Key.....	14
Individual Unit Comment Summaries, DOI Responses, and Maps.....	15

CONNECTICUT

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 Connecticut 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 Connecticut 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

The Connecticut shoreline with its warm waters, protected sound, and numerous harbors is heavily developed with summer cottages and year-round homes. The shoreline consists of rocky headlands, bluffs of sand and rock, numerous sandy or gravelly beaches, and many bays and small estuaries. The State had extensive salt marsh and tidal environments along this shoreline, but most of the wetlands were filled during past cycles of development. In recent years such destruction has been halted so that good examples of coastal wetlands remain along most of the shoreline.

Commercial and industrial activities in the State were once totally water-dependent and thus coastally oriented. Today these activities encompass water- and nonwater-dependent uses. Commercial fishing, shellfishing, and sportfishing, as well as marinas and other tourist facilities, exemplify water-dependent commercial uses of the coast. Though historically of great economic importance, finfishing and shellfishing are no longer major commercial activities along Connecticut's coast. Total finfish landings declined 75 percent (from 20 million pounds to 5 million pounds) in the 20 years between 1950 and 1970. The shellfish industry, which underwent a similar decline, has been enjoying a slow resurgence since the mid-1970's. Sportfishing, commercial recreation, and water-based tourism are growing in importance.

Many older factories and industries along the coast are no longer water-dependent yet occupy valuable coastal acreage. Shipbuilding, petroleum storage, and mineral extraction (i.e., sand and gravel mining) are existing industrial uses of the coast. Manufacturing includes production of machinery, primary and fabricated metals, transportation equipment, chemicals, and food products. Commercial and industrial activities beyond the immediate shorefront have greatly contributed to the economic growth of the 36 coastal municipalities. Between 1960 and 1970 commercial land use in the municipalities increased 133 percent; developments included shopping centers, office buildings, and other trade and service facilities.

Residential areas occupy 25 percent of Connecticut's shorefront. Rising land values and a lack of undeveloped shorefront land have stimulated more recent residential growth away from the waterfront. Within the 36 coastal municipalities, residential development accounted for nearly one-half of the total newly developed land acreage in the 5 years between 1970 and 1975.

Recreational and institutional uses of the shorefront have always occurred. Boating facilities are prominent. Though the State has only 78.6 miles of sandy beaches, they are intensively used. Ownership is public for 30.2 miles of sandy beach and private for 32.1 miles; 16.3 miles are owned by associations. Of the 30.2 miles of beach in public ownership, 7.5 miles are State owned and 22.7 miles are municipally owned. There are 5,599 acres of public campgrounds affording 1,332 sites within the four coastal counties. Within 1 mile of shore, there are over 8,400 acres of recreational lands, including small municipal parks and playgrounds.

COASTAL RESOURCE MANAGEMENT

Connecticut Coastal Resource Management

Connecticut has a tradition of public safety and welfare-oriented coastal regulatory programs at both the State and municipal level. Planning and zoning began in the early 1930's and the State's regulatory program for coastal structures began in 1940. The management of coastal resources first became part of the State's statutory mandate with passage of the Tidal Wetlands Protection Act in 1969 and creation of the Department of Environmental Protection in 1971.

The State's coastal program is coordinated by its Coastal Management Program office within the Department of Environmental Protection. Of the various laws that apply to the coastal zone, including coastal barriers, the most important are P.A. 78-152, the Coastal Management Act (CMA), which established the Connecticut Coastal Area Management Plan; and P.A. 79-535, which amended the Coastal Management Act.

The Coastal Management Act provided the framework for establishing a Coastal Management Program. The Act detailed nine goals and policies that concerned development,

preservation, and use of coastal and water resources and specified the municipalities in the coastal zone. The Act also required the Commissioner of Environmental Protection to prepare a report on the Coastal Management Program, and established a legislative interim study committee to report to the 1979 General Assembly with recommendations for further legislative action. P.A. 79-535 contained 25 amendments. It expanded the goals and policies section of the earlier act, and spelled out specific procedures for implementing legislative policies and goals for the Coastal Management Program. It required towns to review coastal site plans, and mandated that the Commissioner of Environmental Protection answer questions for and provide maps and assistance to coastal towns. It also established a voluntary process for developing coastal programs in the towns and provided for allocation of funding for these programs.

A description of other Connecticut laws that can affect coastal barriers follows.

Coastal Structures Law (C.G.S. Sec. 25-7b to 25-7f). This law requires all structures, filling, and related work in all tidal and coastal waters seaward of the mean high water mark to have a permit. It is enforced by the Department of Environmental Protection (DEP)-Water Resources Unit (WRU).

Coastal Dredging Law (C.G.S. Sec. 25-10 to 25-18). This law requires a permit for removing sand, gravel, or other materials from lands under tidal waters and coastal waters seaward of the mean high water mark. It is enforced by the DEP-WRU.

Tidal Wetlands Law (C.G.S. Sec. 22a-35 as amended by P.A. 79-535). This law requires a permit for all activities in tidal wetlands, except (a) mosquito control ditching by the State Health Department under authority of C.G.S. Sec. 19-50 and 51, (b) DEP conservation activities, (c) construction and maintenance of navigation aids, and (d) emergency health measures in all marsh areas at or below an elevation of 1 foot above local extreme high water and capable of growing salt-tolerant flora. It is enforced by the DEP-WRU.

Flood Control Law (C.G.S. Sec. 25-4a to 25-4f). This law requires permits for stream clearance or any form of flood control or flood alleviation measure within which any obstruction, encroachment, or hindrance is placed along shorelines of any tidal or inland waterway or flood prone area (as determined by DEP). It is enforced by DEP-WRU.

Water Pollution Control Law (C.G.S. Sec. 25-54). This law requires permits for all sewer lines, sewage treatment plants, and discharges. All sources, actual and potential, of water contamination in any waters of the State, including ground water, are subject to pollution abatement orders. This law is enforced by DEP-Water Compliance.

Fisheries Laws (Shellfishing) (C.G.S. Sec. 26-187 to 26-237). These laws subject the taking of shellfish and the leasing and cultivation of all designated State shellfish beds to police power and proprietary

controls. It is enforced by the Department of Agriculture-Aquaculture Division.

State Assistance for Flood Control and Beach Erosion Law (C.G.S. Sec. 25-69 to 25-83a). This law authorizes the State to pay the total cost of flood and erosion control projects benefiting State property (consistent with Sec. 20 of the Coastal Management Act), 66 percent of the cost of such projects benefiting municipal property, and 33 percent of the cost of such projects benefiting private property. It is administered by the DEP-WRU.

Executive Order 18 (June 10, 1977, relating to flood control and beach erosion). This law requires State agencies to follow Federal Emergency Management Agency standards in undertaking development projects in floodplains.

State Park and Recreation Laws (C.G.S. Sec. 22 to 26). These laws provide the Commissioner of DEP with broad authority to purchase or condemn property for recreational uses (consistent with Sec. 20 of the Coastal Management Act). The Commissioner also receives and disburses Federal funds for purchase of property by municipalities for recreational use. It is administered by DEP-Parks and Recreation Unit.

State Open Space Conservation and Recreation Laws (C.G.S. Sec. 22 to 26). These laws provide the Commissioner with broad authority to purchase or condemn land for conservation and research uses and to control uses of such lands and waters (consistent with Sec. 20, CMA). It is administered by DEP.

State Transportation Law (C.G.S. Sec. 236 to 242). This law authorizes the State Department of Transportation to plan and construct State highways, including interstate highways (consistent with Sec. 20 of CMA). It is administered by the Bureau of Highways.

Connecticut Development Authority (C.G.S. Sec. 32-10 to 32-23m). This law provides the Connecticut Development Authority with broad authority to construct, purchase, manage, or help finance development projects including

pollution control facilities, ferry boats, and recreation facilities (consistent with Sec. 20 of the CMA). It is administered by the Department of Economic Development.

Local Actions

In the City of Norwalk, the CBRS units have been zoned under "conservation" and are, or will be, owned by the City, the Nature Conservancy, or the Federal government.

Private Sector Initiatives

For 3 years the Connecticut Audubon Society has defended the Milford Point CBRS unit against development. The society believed that the unit would have been developed if a builder had found enough backing to proceed without Federal insurance. In 1985, the Milford unit was included in Federal legislation to create the Connecticut Islands National Wildlife Refuge.

The Nature Conservancy has exercised an option it held to purchase Chimon Island, part of the Norwalk Islands CBRS unit.

EXISTING CBRS UNITS

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

D08-Napatree (New London). The Connecticut portion of this unit contains the northwest end of Sandy Point and its surrounding aquatic habitat.

E01-Wilcox Beach (New London). This unit is a broad, low spit just south of the Village of Quabaug fronting on Fishers Island Sound.

E01A-Ram Island (New London). This island is in Fishers Island Sound, southeast of the Village of Noank.

E02-Goshen Cove (New London). This unit on Long Island Sound in the Town of Waterford

CBRS UNITS IN CONNECTICUT ESTABLISHED BY CONGRESS, 1982

Unit Name	Unit ID Code	County	Shoreline Length (miles)	Total Area (acres)	Fastland Area (acres)
Napatree	D08	New London	0.2	536.0	0.0
Wilcox Beach	E01	New London	0.6	254.9	6.7
Ram Island	E01A	New London	1.4	24.4	17.1
Goshen Cove	E02	New London	0.7	62.9	18.2
Jordan Cove	E03	New London	0.5	34.7	11.6
Niantic Bay	E03A	New London	0.5	20.2	6.9
Lynde Point	E03B	Middlesex	0.4	170.8	62.8
Menunketesuck Island	E04	Middlesex	0.5	160.4	4.5
Hammonasset Point	E05	Middlesex	0.3	61.8	8.9
Milford Point	E07	New Haven	0.4	52.2	15.2
Fayerweather Island	E08A	Fairfield	0.7	241.1	13.6
Norwalk Islands	E09	Fairfield	2.0	1,425.8	167.1
Totals:			8.2	3,045.2	332.6

contains two segments. The eastern part is a spit connected to Harkness Memorial Park that extends out across the entrance to Alewife Cove. A small tidal marsh lies behind the barrier. The western segment, also adjacent to the park, is a bay barrier protecting a brackish lagoon called Goshen Cove. The cove drains into Long Island Sound through a narrow, temporary channel on the eastern side of the barrier. Goshen Point separates the two barrier segments.

E03-Jordan Cove (New London). This unit is a broad sand spit facing Long Island Sound with Jordan Cove behind. It is attached to the mainland just north of the Village of Pleasure Beach in the Town of Waterford.

E03A-Niantic Bay (New London). This unit is a small cape with marshlands behind it, including a small pond. It is on the northeastern shore of Niantic Bay just south of the railroad and highway bridges at the entrance to the Niantic River. The barrier contains a dune ridge at least 10 feet high.

E03B-Lynde Point (Middlesex). The Lynde Point unit is a broad cape on the western shore of the Connecticut River entrance partially protecting South Cove. It is just east of the Village of Fenwick in the Town of Old Saybrook. The Saybrook Lighthouse is in the unit, and a long jetty extends into Long Island Sound from the point.

E04-Menunketesuck Island (Middlesex). This island is part of a developing tombolo system and is mainly composed of an upland and tidal flats. The upland supports well-developed grassy zones and shrub thickets. The barrier is oriented at right angles to the mainland and is just offshore in Long Island Sound from the Village of Hawks Nest.

E05-Hammonasset Point (Middlesex). This unit is a long spit extending northeastward from Hammonasset Point about three-fourths of the way across Clinton Harbor. The community of Cedar Island in the Town of Clinton is at the end of the spit. The barrier protects an extensive salt marsh system along its western half, as well as broad tidal flats and the entrance to the Hammonasset River. The unit is adjacent to Hammonasset State Park.

E07-Milford Point (New Haven). The Milford Point unit is a recurved barrier spit on the north side of the Housatonic River entrance to the Town of Milford. It protects an extensive salt marsh system that is owned by the State of Connecticut and managed as a wildlife sanctuary. A long jetty that protects the northeast side of the Housatonic River channel extends out from to the point.

E08A-Fayerweather Island (Fairfield). This unit is a small tombolo system containing Fayerweather Island and a narrow beach which connects it to a coastal park in the City of Bridgeport on the east side of Black Rock Harbor. The unit protects the entrance to the Black Rock Harbor.

E09-Norwalk Islands (Fairfield). The unit consists of four major islands (Sheffield, Copps, Chimon, and Goose) that are part of the Norwalk Island system in Long Island Sound just offshore from the City of Norwalk. The islands shelter the southeast entrance to Norwalk Harbor. They have been included in the newly approved Connecticut Coastal National Wildlife Refuge. Chimon Island is especially noted for its heron rookery, made up primarily of yellow-crowned night herons. It is the largest such breeding colony in Long Island Sound.

RECOMMENDED ADDITIONS AND MODIFICATIONS

The Department of the Interior recommends that all undeveloped, unprotected coastal barriers and associated aquatic habitat identified in Connecticut be added to the Coastal Barrier Resources System. The DOI also recommends that otherwise protected, undeveloped coastal barriers be excluded from the CBRS. Part of existing CBRS units E02 and E09 and all of existing units E05, E07, and E08A are otherwise protected; DOI recommends these areas be deleted from the CBRS. However, if any otherwise protected, undeveloped coastal barrier is ever made available for development that is inconsistent with the purposes of the CBRA, the DOI recommends that it then be automatically included in the CBRS. A complete discussion of DOI's recommendations concerning otherwise protected coastal barriers appears in Volume 1. Maps of all otherwise protected, undeveloped coastal barriers in Connecticut appear in the following section. A table presenting the Department's position on each unit or proposed unit identified in Connecticut 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 Connecticut reviewed the 1987 Draft Report and made recommendations on several of the existing and proposed CBRS units in the State. The State supports a CBRS expansion in Connecticut. The State opposes excluding otherwise protected, undeveloped coastal barriers from the System, however, the State did provide DOI with detailed information about the locations of protected areas in Connecticut. The State's positions on individual CBRS units are discussed in the following section, interspersed with the appropriate maps. The State's positions on the DOI's general recommendations are discussed in Volume 1.

The Department received eleven other letters concerning Connecticut. Two of these expressed general support for a CBRS expansion in the State. One opposed it. The others all contained comments on specific existing or proposed CBRS units. These are discussed and reprinted in the following section, interspersed with the appropriate maps.

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN CONNECTICUT

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shoreline Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
D08	Napatree	New London	2	0.3	1,236	31	Add new area to existing CBRS unit
E01	Wilcox Beach	New London	2	0.6	384	12	Add new area to existing CBRS unit
E01A	Ram Island	New London	2	1.4	24	17	No change to existing CBRS unit
CT-01	Mason Island	New London	2	0.5	61	42	Add to CBRS
E02	Goshen Cove	New London	2	0.2	40	27	Eastern segment and half of western segment State protected; delete from CBRS
E03	Jordan Cove	New London	2	0.5	76	12	Add wetlands to existing CBRS unit
E03A	Niantic Bay	New London	2	0.5	20	7	No change to existing CBRS unit
CT-06	Mile Creek	New London	2	0.2	56	16	Add to CBRS
E03B	Lynde Point	Middlesex	2	0.4	171	63	No change to existing CBRS unit
CT-08	Cold Spring Brook	Middlesex	2	0.1	21	5	Add to CBRS
E04	Menunketesuck Island	Middlesex	2	0.5	160	5	No change to existing CBRS unit
CT-09	Harbor View	Middlesex	2	0.3	95	5	Add to CBRS
E05	Hammonasset Point	Middlesex	2	—	—	—	State protected; delete from CBRS
CT-11	Sea View Beach	Middlesex	2	0.2	42	11	Add to CBRS
CT-12	Lindsey Cove	New Haven	3	0.3	9	5	Add to CBRS
CT-13	Kelsey Island	New Haven	3	0.3	32	9	Add to CBRS
E07	Milford Point	New Haven	3	—	—	—	Federally protected (FWS); delete from CBRS
E08A	Fayerweather Island	Fairfield	4	—	—	—	Locally protected; delete from CBRS

(continued)

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN CONNECTICUT (CONCLUDED)

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shoreline Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
E09	Norwalk Islands	Fairfield	4	1.2	1,314	35	Delete Federally protected areas from existing CBRS unit
Total - CBRS as Recommended				7.5	3,741	302	
Existing CBRS				8.2	3,045	333	
Net Change in CBRS				-0.7	+696	-31	

^aUNIT ID CODE - State initials (CT) plus a number identify a proposed new unit. An existing unit is identified by the legal code letter (D or E) 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

1422



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



June 26, 1987

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

Gentlemen:

Thank you for the opportunity to review and comment on the REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM - Executive Summary and the maps depicting areas under consideration for inclusion into the Coastal Barrier Resources System. On behalf of the Governor and the Commissioner of Environmental Protection, The Office of Planning and Coordination/Coastal Management has coordinated a review of these materials and technical comments are attached for your review and consideration. These comments are being submitted within the time extension granted by Mr. Frank McGilvery (Coastal Barriers Coordinator).

Connecticut continues to strongly support the purpose and intent of the Coastal Barrier Resources Act (CBRA) and many of the recommendations proposed in the Executive Summary. We are pleased to see that several of the concerns we raised in 1985 (see attached document) have been resolved. However, the deletion of otherwise protected coastal barriers from the System is the issue of greatest concern. Previously, we recommended that otherwise protected barriers be incorporated into the System and that the CBRA be amended to address the special problems and opportunities associated with public recreation areas. Incorporation of otherwise protected barriers into the System and amending the Act would promote recreational use of barriers while allowing the federal government to exercise control over the type and location of recreational facilities and activities to assure conservation of coastal barriers. Connecticut recommends that Department of the Interior (DOI) give serious consideration to the inclusion of this recommendation.

As the DOI has a lead role in the implementation and oversight of the CBRA Connecticut recommends that DOI request Congressional authorization for additional funds to implement this program. Only through such a request can I obtain the staffing necessary to effectively carry out the purposes of CBRA without undue reliance on state staffs.

Phone:
165 Capitol Avenue • Hartford, Connecticut 06106
An Equal Opportunity Employer

CONNECTICUT COMMENTS ON THE
REPORT TO CONGRESS: COASTAL BARRIER RESOURCES
SYSTEM (Maps and Executive Summary)

June 26, 1987

Office of Planning & Coordination/
Coastal Management
Connecticut Department of Environmental
Protection
71 Capitol Avenue
Hartford, CT 06106

2

Thank you again for the opportunity to comment upon the proposed changes to the Coastal Barrier Resources Act. If you have any questions regarding these comments, please contact Ron Rozsa of this office at 203-566-7404.

Sincerely,

for, Arthur J. Rocque, Jr.
Director, Planning & Coord./
Coastal Management

AJR/RR/rr
Enclosure

cc Frank McGilvery
Marlyn Cruz-Aponte

I. COMMENTS REGARDING THE EXECUTIVE SUMMARY AND RECOMMENDATIONS TO CONGRESS

Comments on the REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM - Executive Summary dated March 1987 are presented in detail below. Overall, our principal concern with the Executive Summary and Recommendations to Congress is the proposal to not include otherwise protected coastal barriers in the System except by reference. We support the inclusion of otherwise protected areas in the System and the necessary amendments to CBRA to address the unique needs of these areas and to prohibit the use of federal funds for development that is inappropriate. Once again, we urge the Department of Interior to include the recommendations proposed by this Office in 1985 (see attached).

A. PROPOSED RECOMMENDATIONS FOR ADDITIONS TO OR DELETIONS FROM THE CBRA

1. Associated Aquatic Habitats

Connecticut supports the proposed recommendation to include all of the aquatic habitats associated with existing or proposed units.

2. Secondary Barriers.

Connecticut supports the inclusion of secondary barriers within CBRA. Technically, all of the existing and proposed barriers located within Long Island Sound belong to this category. In our judgement, however "Embayed" or "low energy" are better and more accurate terms than "secondary".

3. Otherwise Protected Coastal Barriers.

Connecticut does not support the deletion of otherwise protected coastal barriers from the CBRS. All otherwise protected barriers should be added to the system and the CBRA should be amended (see attached comments, I.A on page 2) to allow for the construction of new or the maintenance of existing recreational facilities with federal funding where appropriate. Unless this approach is adopted, funding made available through the federal government may be used for development that is inappropriate. (for example, construction of structures such as ranger stations or bath houses seaward of or on a dune, or which alter wetlands). Implementation of the above recommendation would allow the federal government to support appropriate recreational development on coastal barriers and guide how and where development occurs so that impacts on sensitive coastal resources are minimized.

For the purposes of identifying publicly owned coastal barriers, DOI developed criteria that were, in our opinion, general and vague rather than using the existing criteria for

1

undeveloped barriers. Connecticut does not support this approach and recommends that DOI utilize the criteria developed for undeveloped and unprotected coastal barriers. Uniform criteria and standards should be used to identify coastal barriers irrespective of ownership.

Connecticut also recommends that DOI adopt through regulation, performance standards that will be used to determine consistency of proposed development activities on otherwise protected barriers with CBRA.

With respect to including the otherwise protected sites in the CBRS by reference, since the DOI did not generate a list of otherwise protected barriers, we cannot determine if DOI's list is complete. Also, if Congress were to adopt DOI's recommendation, we could not support the inclusion of sites by a listing process only. A list does not depict or describe the boundaries of the identified area and is likely to foster debate and confusion. Therefore, we recommend that DOI prepare a full list of otherwise protected barriers and depict the boundaries of these areas on a set of maps. This information should be forwarded to the affected states for review and comment.

B. PROPOSED CONSERVATION RECOMMENDATIONS

1. Regulatory Consistency

Connecticut does not support DOI's recommendation to not require federal regulatory programs to withhold regulatory permits if the activity is inconsistent with the purposes of CBRA (see attached comments for detail, I.D. on page 8). While it is true that regulatory programs do take into account, to varying degrees, fish and wildlife values, they often do not take into account impacts to the coastal barrier itself. An excellent example of this is the countless number of 'erosion' control structures permitted along coastal barriers every year by the U.S. Army Corps of Engineers. Structures such as seawalls and groins increase erosion, significantly alter the ecologic and geomorphic processes and often threaten the very existence of the associated coastal barriers. Connecticut therefore continues to recommend that CBRA be amended to require that federal permits, licenses, and certifications be consistent with the CBRA or otherwise withheld.

2. Channel Improvements and Related Structures.

We support the proposed recommendation to Section 6(a)(2) which will require that the "maintenance of existing channel improvements...be performed in a manner consistent with the purposes of this Act". However, we continue to recommend (see B.1 on page 3 of the attached document) the following amendment of this section to allow for "REPLACEMENT, RECONSTRUCTION OR REPAIR BUT NOT THE EXPANSION of existing channel improvements".

2

II. EVALUATION OF PROPOSED RECOMMENDATIONS FOR ADDITIONS TO OR DELETIONS FROM THE COASTAL BARRIER RESOURCES SYSTEM

In this section, the list of proposed and existing coastal barriers was reviewed both for completeness and to assure that the areas meet the definitions of an undeveloped coastal barrier whose geomorphic and ecologic processes are not impaired.

No reference list of otherwise protected coastal barriers is provided in the Report to Congress with regard to the proposed recommendations for additions or deletions. In the absence of this list, it is not possible to determine whether or not DOI's list of otherwise protected barriers is complete and accurate.

A. Deletion of Otherwise Protected Coastal Barriers from the 'Reference List' Which Do Not Meet the Definition of an undeveloped coastal barrier.

The following are otherwise protected coastal barriers which are listed on pages 5 to 7 which were recommended for deletion in 1985 by Connecticut (see attached comments, II.A on page 10) because they did not meet the definition of an undeveloped coastal barrier and their geomorphic and ecologic processes had been significantly impaired by historic development.

1. Ocean Beach, New London
2. Rocky Neck State Park, East Lyme
3. Gulf Beach, Milford
4. Sherwood Island State Park, Westport

Again, it is recommended that these be deleted from the CBRS.

B. Deletion of Mapped Areas (proposed or existing) that Meet the Otherwise Protected Definition.

There are several existing and proposed coastal barriers that are mapped as privately owned coastal barriers which are publicly owned and held for conservation purposes. These should be transferred to the reference list containing the otherwise protected sites.

1. Bluff Point, Groton (CT-02). This proposed addition is located within the Bluff Point Coastal Reserve (not State Park) shown on map 13. It is owned by the State of Connecticut and is managed by DEP.
2. Goshen Cove, Waterford (E02). The State of Connecticut recently acquired a portion of The Strand (the barrier located seaward of Goshen Cove) to the west of the inlet. See attached map for approximate boundaries. This represents an addition to the Harkness State Park which is managed by DEP.

3

3. Hammonasset State Park, Clinton (E05). The proposed addition and the existing barrier located south and southeast of the Hammonasset River are otherwise protected sites. Within the existing barrier is a 2 acre section owned by the Town of Clinton. The remainder was acquired by The Nature Conservancy in 1986 and will soon be transferred to DEP. The proposed addition is a portion of the Hammonasset Natural Area that is owned by the State of Connecticut and managed by DEP.

4. Milford Point, Milford (E07). The majority of the wetland area behind the barrier is known as the Wheeler Wildlife Management Area and is owned by the State of Connecticut and managed by DEP. The area of beach labeled U.S. Military Reserve on the map is owned by the State of Connecticut and is managed by DEP as a nature study area. Existing E07 is part of the Connecticut Wildlife Refuge System which is owned by The Nature Conservancy and is leased to the U.S. Fish and Wildlife Service.

5. Fayerweather Island, Bridgeport (E08A). This island is owned by the City of Bridgeport and is part of Seaside Park.

6. Norwalk Island Complex, Norwalk and Westport (E09). Chimon and Sheffield (with the exception of several small private inholdings) Islands are part of the Connecticut Wildlife Refuge System and are owned by the federal government and managed by the U.S. Fish and Wildlife Service.

4

OTHER GENERAL COMMENT LETTERS CONCERNING CONNECTICUT

622

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

2

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

3

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 lengthy negotiations (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

4

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

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

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.

Connecticut

We support the proposed additions and expansions of all eligible units listed in the Department's 1985 inventory for Connecticut, including the sixteen areas requested for inclusion by the State of Connecticut.

327



O'NEILL REALTY

115 Black Point Road
Naunc. Conn. 06357
(203) 739-4678

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

Gentlemen:

I write this letter from two viewpoints: first as a fortunate homeowner of more than 30 years on Jordan Cove in Waterford, Connecticut and secondly as a Real Estate Agent who is heartsick at the wanton use of the ever-diminishing coastline from New York to Rhode Island. It is not difficult to envision in the near future one long line of condominiums--- "Boast your own dock" promotions! to overpowering marinas-- eg.- Noank, Ct.-- gulping up our noble coastline and open waterways.

Many of these developers--well aware of the astronomical return on their money do not hesitate to spend millions of dollars on fill, lobbying, padding just to sell at equally astronomical prices. Too soon the ordinary little fellow will not even be able to take his children to a public beach-- what sort of heritage is this? If action is not immediate we shall lose forever the last vestiges of protection for our shoreline. I implore you-- act to preserve that which is still intact!

Sincerely yours,

Lorraine Durivan

Lorraine Durivan
Highway Point Lane
Waterford, Ct. 06385

April 28, 1987



1369



May 29, 1987

The Coastal Barriers Study Group
Department of the Interior
National Park Service
PO Box 37127
Washington, DC 20013-7127

Gentlemen:

In regards to the "Report to Congress: Coastal Barrier Resource System" executive summary, it seems to be very one-sided and totally environmentally oriented, generalizing conditions not true in every instance and leaving out conditions which do exist which are beneficial.

The report starts out, in fact is named for the fact that the "barriers" do protect the land from the advancing sea, and gives no credit to man's development as a benefit. Man's construction assists nature in protecting the inner waters. Nowhere in the report does the idea of the quality of development potential come into play. Development of the barrier islands to allow man and nature to share the benefits while man pays to upgrade, raise up levels, create wetlands as trade offs, dredge to make deep and clean waters in payment of development rites, plant stabilizing vegetation, close off inlets where environmentally beneficial, create waterways where necessary to assist nature, re-zone endangered wildlife refuges to large plots which will encourage private enterprise to upgrade and save whole barriers thus benefiting both the birds and man.

This report is obviously very one-sided and slanted towards the do nothing development alternative which if adopted as law will probably do more to devastate our coast in the long run. Fear of profit makers, developers and private ownership should not influence National policy.

The undersigned would appreciate comment.

James R. Gardella

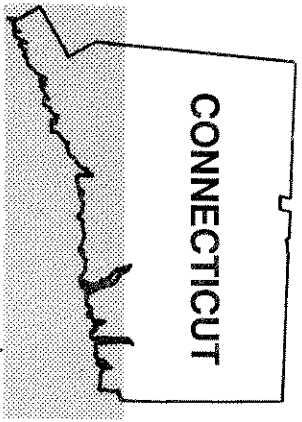
James R. Gardella
NORWALK COVE MARINA, INC.

Norwalk Cove Marina, Inc.

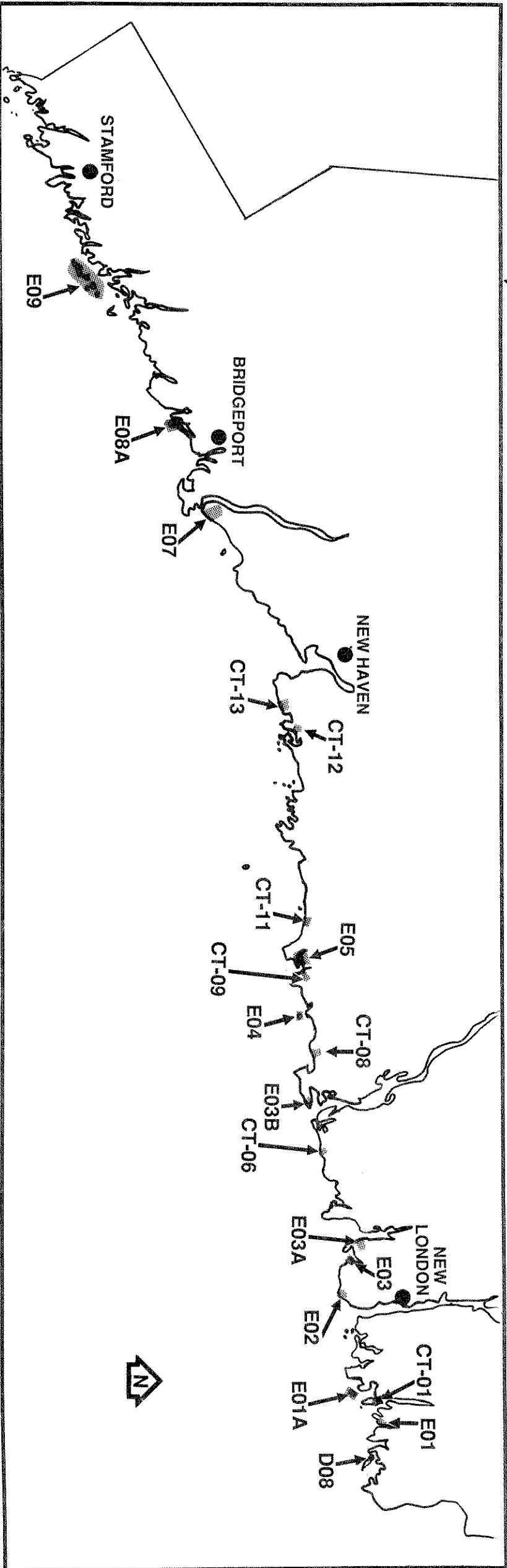
BEACH ROAD, EAST NORWALK, CONNECTICUT 06855 • 203-838-2326

MARINAS • SERVICE FACILITIES • FITTING OUT SPECIALISTS • REPRESENTING
MANUFACTURERS OF THE HIGHEST QUALITY YACHTS AND RELATED ACCESSORIES

INDEX TO EXISTING AND PROPOSED CBRS UNITS IN CONNECTICUT



Coastal zone



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

MAPS DEPICTING EXISTING AND PROPOSED CBRS UNITS

Unit ID Code	Unit Name	USGS Topographic Map or Map Composite	Page
D08	Napatree	Watch Hill	15
		Mystic	16
E01	Wilcox Beach	Mystic	16
E01A	Ram Island	Mystic	16
E02*	Goshen Cove	New London	19
E03	Jordan Cove	Niantic	21
E03A	Niantic Bay	Niantic	21
E03B	Lynde Point	Old Lyme	22
E04	Menunketesuck Island	Essex	25
E05*	Hammonasset Point	Clinton	26
E07*	Milford Point	Milford	30
E08A*	Fayerweather Island	Bridgeport	32
E09*	Norwalk Islands	Sherwood Point	34
		Norwalk South	35
CT-01*	Mason Island	Mystic	16
CT-06*	Mile Creek	Old Lyme	22
CT-08	Cold Spring Brook	Essex	25
CT-09	Harbor View	Clinton	26
CT-11	Sea View Beach	Clinton	26
CT-12	Lindsey Cove	Branford	28
CT-13	Kelsey Island	Branford	28

*Public comment summaries and DOI responses follow unit map.

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

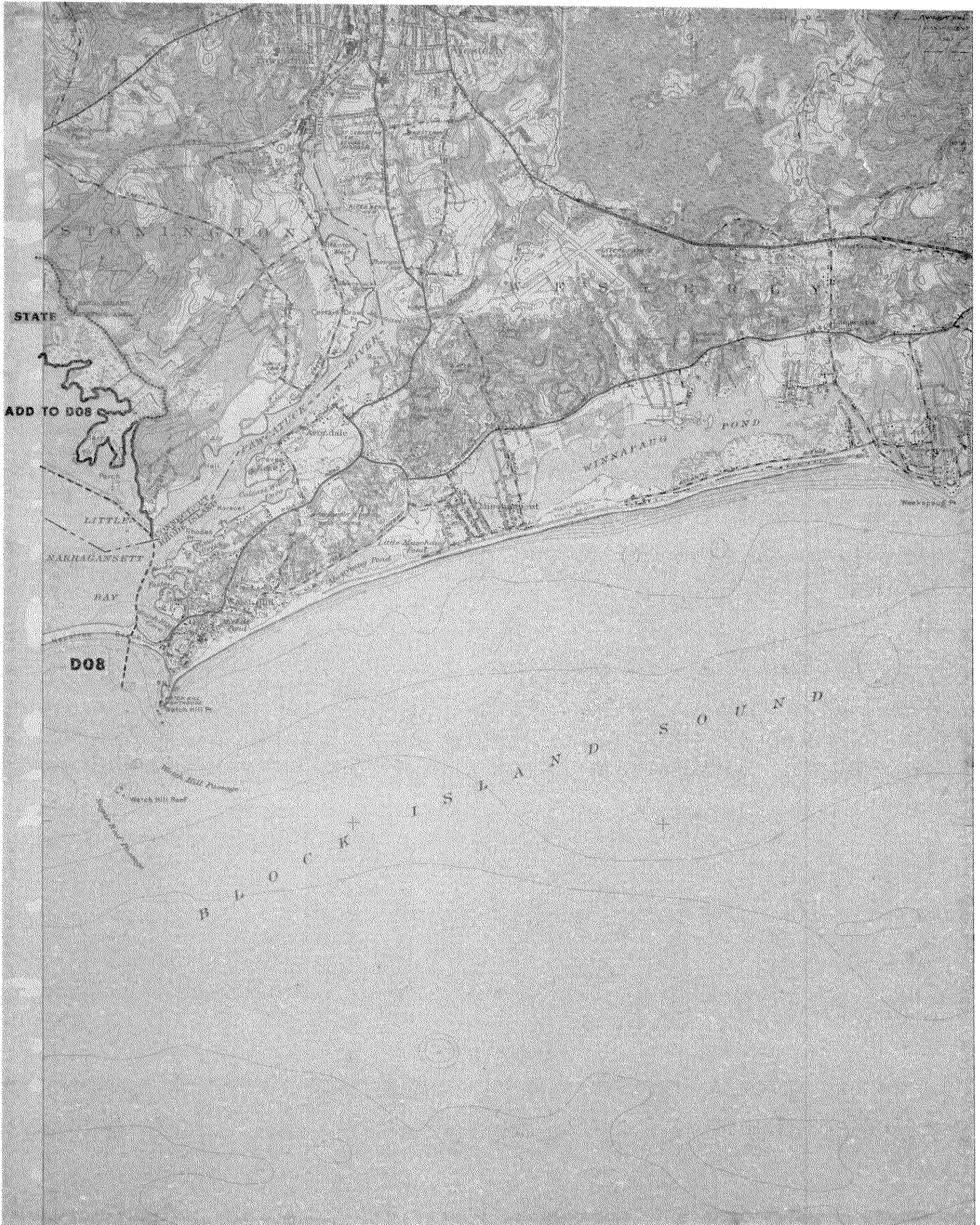
USGS Topographic Map or Map Composite	Coastal Barrier Status	Page
Watch Hill	State	15
Mystic	State	16
New London	State	19
Niantic	Private	21
Old Lyme	Private	22
Clinton	State	26
New Haven	Local	29
Milford	Federal, State	30
Bridgeport	State, Local	32
Sherwood Point	Local	34
Norwalk South	Federal, Local	35

*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 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 east to west.



Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



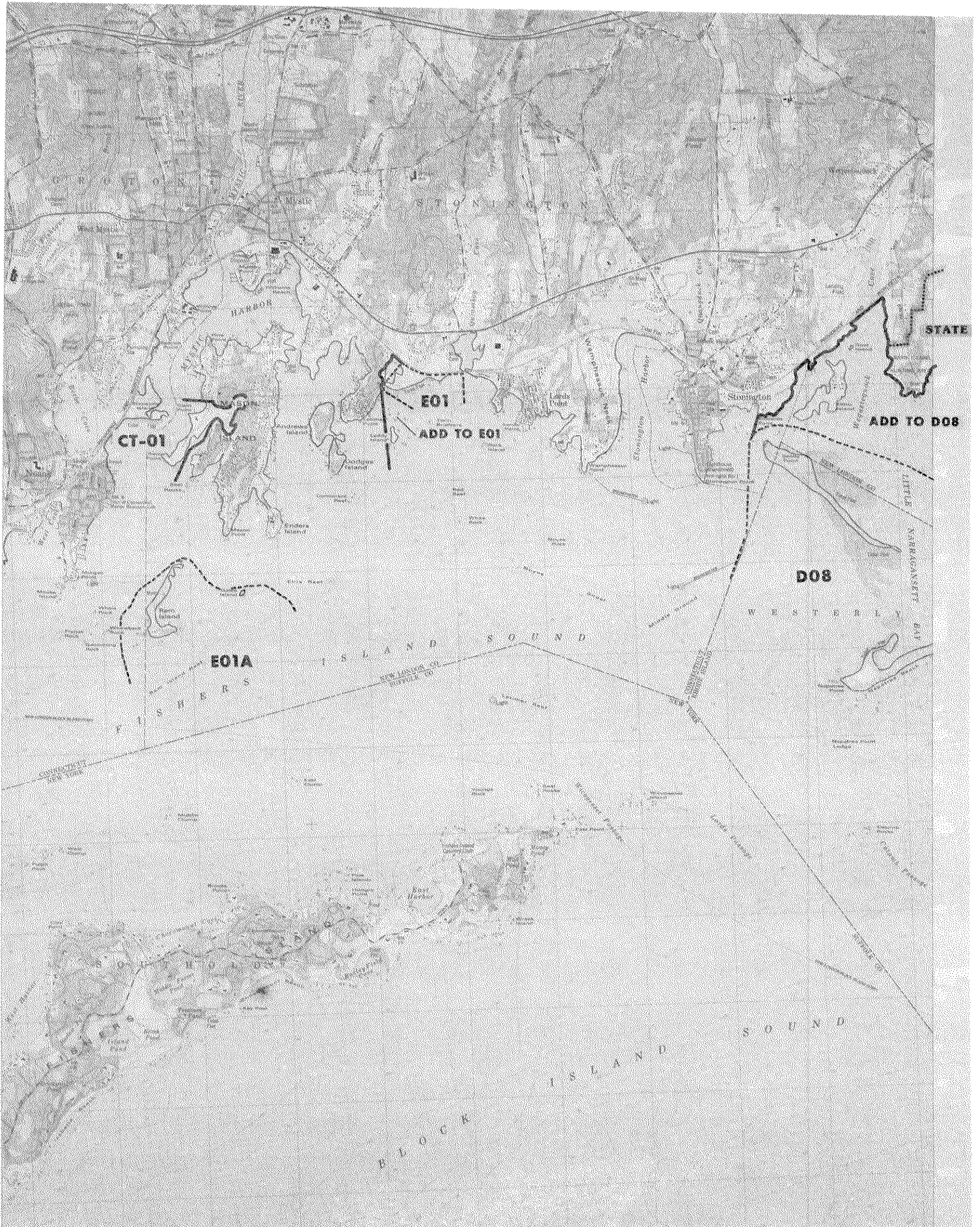
Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
WATCH HILL
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.

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



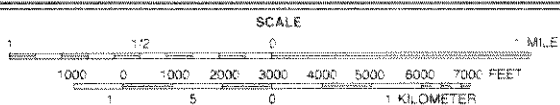
UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
MYSTIC
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97-348)
- - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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

CT-01 - MASON ISLAND

State Position: The State of Connecticut supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: Three letters were received claiming that parts of Mason Island are developed and should be excluded from the proposed unit. They are reprinted below.

Response: All of CT-01 has been closely examined and fully meets DOI's definitions of an undeveloped coastal barrier. The proposed unit fully qualifies for addition to the CBRS.

DOI Recommendation: The DOI recommends that CT-01 be added to the CBRS as delineated.

577

LAW OFFICES

O'BRIEN, SHAFNER, BARTNIK, STUART & KELLY, P.C.

JOHN C. O'BRIEN
MATTHEW SHAFNER
PETER J. BARTNIK
PETER F. STUART
CAROLYN P. KELLY
GRANVILLE R. MORRIS
FRANK W. EPPINGER
MYLES J. LAFFEY
MARK BLOCK
CYNTHIA L. FAUSOLD*
LORRAINE D. ECKERT
RAYMOND T. TREVISACCI**
SHELLEY M. WEISS**
JAMES W. AUWOOD

BRIDGE STREET AT ROUTE ONE
POST OFFICE DRAWER 929
GROTON, CONNECTICUT 06340
TELEPHONE (203) 449-2483

NORWICH OFFICE
89 MAIN STREET
HAYMARKET BUILDING
POST OFFICE BOX 310
NORWICH, CT 06300
TELEPHONE (203) 889-3885
(203) 886-5994

May 7, 1987

FILE NO.

*ALSO ADMITTED IN RHODE ISLAND
AND NEW YORK
**ALSO ADMITTED IN RHODE ISLAND
***ALSO ADMITTED IN NEW YORK

Mr. Frank McGilvery
U.S. Fish and Wildlife Service
Department of Interior
Hamilton Building
1375 K Street - Room 400
Washington, D.C. 20005

RE: Coastal Barrier Resources System Quadrangle
Mystic, Connecticut

Dear Mr. McGilvery:

I am writing to you on behalf of Mr. Rufus Allyn, Mr. Roy Bolanger, Mr. and Mrs. Law, and Mr. and Mrs. Shultz, all of whom are property owners on Masons Island, Mystic, Connecticut, and whose property is proposed to be included in The Coastal Barrier Resource System.

The section to be included on Masons Island is, for the most part, appropriate and would preserve an ecologically sensitive area. There is a section of that designation that includes, at its northwest corner, two houses and an approved building lot which are inappropriate for inclusion and which would cause great financial hardship to the owners of the property. I have outlined on the Assessor's Map for the Town of Stonington a proposed readjustment of the northwesterly line in a manner that would exclude the three properties owned by my clients. I have drawn a proposed new boundary line in green and would ask that the government map be changed accordingly.

The Shultz house sits on a rocky promontory elevated well over the high water line, whereas the Law property is fully developed and, although lower, is occupied by an expensive home.

O'BRIEN, SHAFNER, BARTNIK, STUART & KELLY, P.C.

Page -2-
May 7, 1987

The undeveloped lot owned by Messrs Bolanger and Allyn is currently on the market and meets all requirements for a building lot under State and local law. These three properties are served by an asphalt road and none of the properties would seem to fall within the definition of an undeveloped coastal barrier.

Messrs Bolanger and Allyn do, however, own a somewhat isolated house located approximately 300 yards south of any proposed new boundary which would be included in the coastal zone since it is surrounded by ecologically sensitive property.

I would appreciate your attention to this request and a response to my comments at your convenience.

Thank you for your cooperation.

Very truly yours,

John C. O'Brien

John C. O'Brien

JCO:kmi
Enclosure

1376

Mr Frank McGilvery
U. S. Fish & Wildlife Service
Department of Interior
Hamilton Bldg
1375 K St - Room 400
Washington, D.C. 20005

26 School House Rd
Mystic, Ct. 06355
June 6, 1987

Dear Mr McGilvery -

The matter of a recent proposal of The Coastal Barrier Resources System concerning Masons Island here at Mystic, Ct. has just recently been brought to my attention, since I had been away. You are probably aware of our problem which has been outlined in letters from Atty. John O'Brien and my neighbors, Rufus Allison and W. J. Scholz

I agree with Mr O'Brien that for the most part the section to be included on Masons Island is appropriate. There is considerable tidal marsh adjoining parts of our properties which we ourselves would not want changed. However, it does not seem equitable to include developed properties which have been here many years such as ours ^{built} 39 years ago. It would seem such property should not be classified as "Undeveloped Coastal Barrier". The absence of flood insurance would not affect us personally but if our heirs ever wanted to sell the property it would be an obvious problem.

We would indeed appreciate if you could have the problem reviewed and consider a favorable ruling for us.

Respectfully yours,
Stewart C. Fair

1364

30 School House Road
Mystic, Ct. 06355
June 4, 1987

Mr. Frank McGilvery
U. S. Fish and Wildlife Service
Department of Interior
Hamilton Building
1375 K Street - Room 400
Washington, D. C. 20005

RE: Coastal Barrier Resources System Quadrangle
Masons Island, Mystic, Ct.

Dear Mr. McGilvery:

With reference to the above captioned matter, it is my understanding that our property falls within the confines of The Coastal Barrier Resources System. Its borderline is proposed to run north of us, thereby excluding our property, as well as two other homes, plus an acknowledged building lot adjoining our property, from availability of flood insurance coverage. Since our home is located high and dry well above the median high water mark and in the absence of a major tidal wave in no danger from the sea, we are still facing a potential problem in the event that a new mortgage has to be secured by us or a future buyer of the property. It is a reasonably safe assumption that the bank will require flood insurance. This might make a sale impossible or at least substantially diminish the market value of our property.

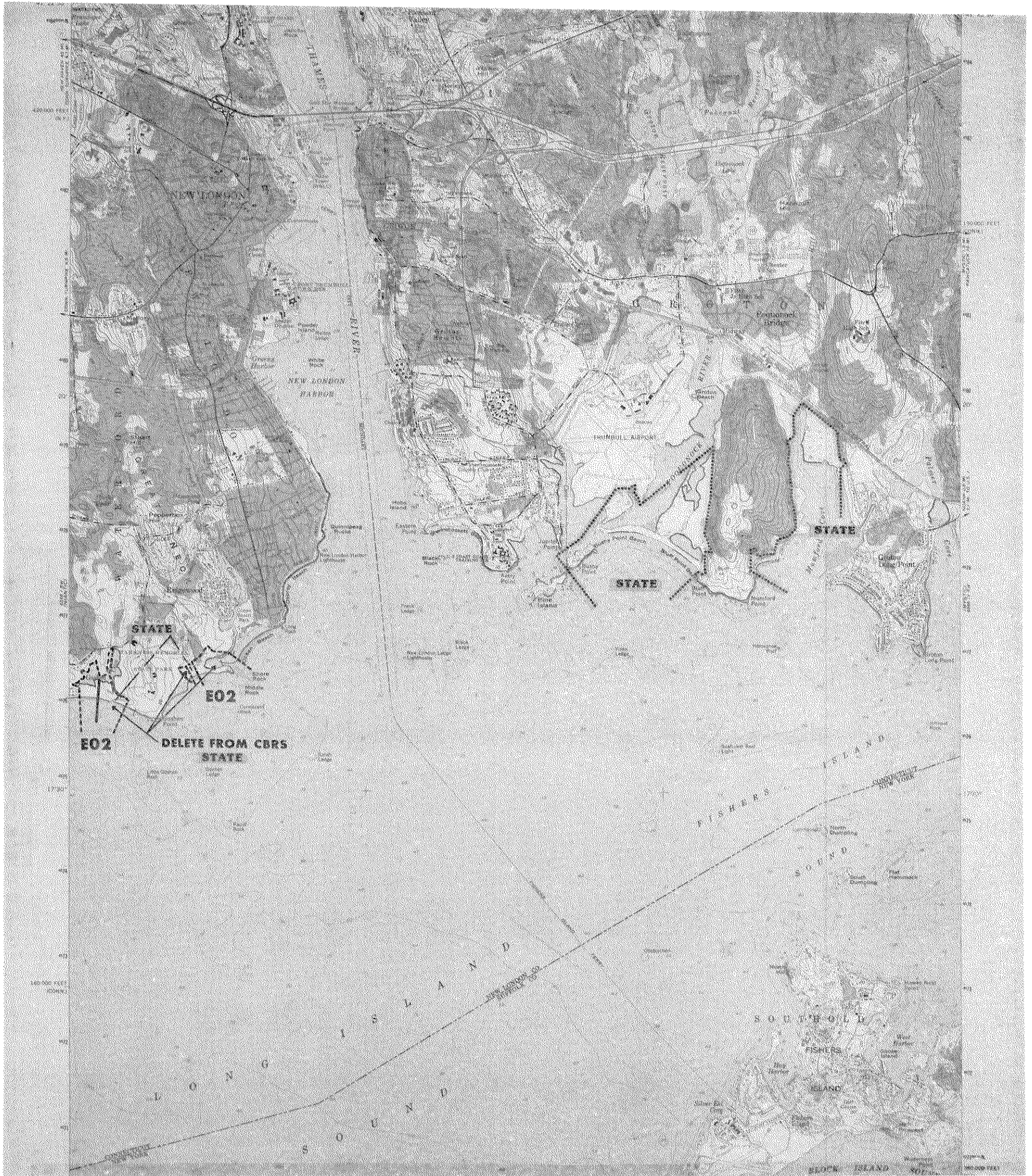
Our property is firmly connected with the rest of Masons Island by an asphalt road and at least 2.7 acres of the 3 which we own are high, dry, cultivated and landscaped. Therefore, it hardly meets the definition and purpose of a coastal barrier as defined by the Act of Congress of January 25, 1982, entitled "Coastal Barrier Resources Act."

We respectfully request your review of the matter and would very much appreciate a favorable ruling excluding our property from the classification "Undeveloped Coastal Barrier" (Sec. 3, (1)) of the above mentioned Act of Congress.

Very truly yours,

W. G. Scholz

cc: Congressman Sam Gejdenson



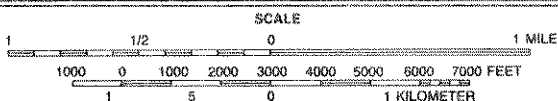
UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
NEW LONDON
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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

E02 - GOSHEN COVE

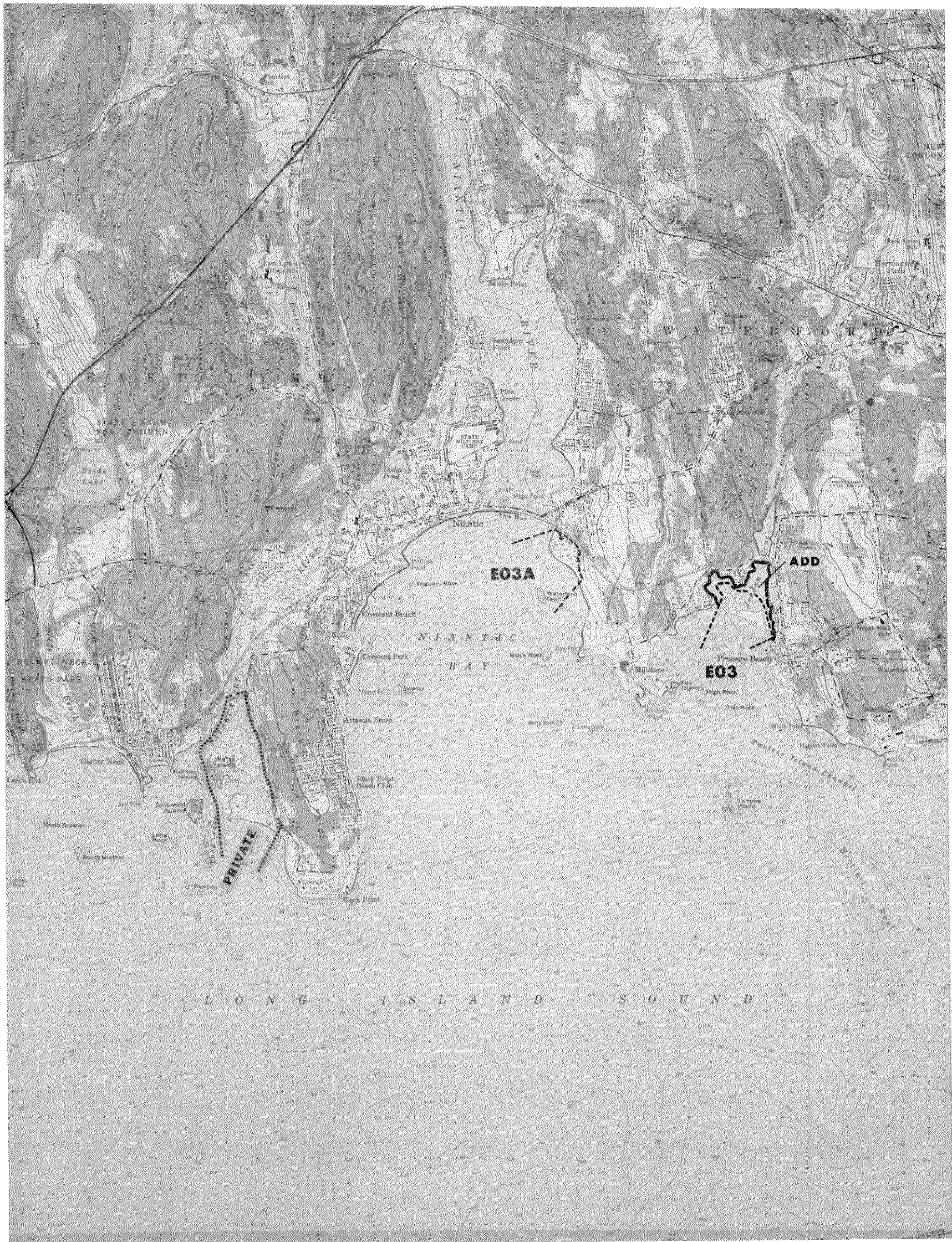
State Position: The State of Connecticut opposes deleting otherwise protected barriers from the CBRS.

Other Comments: No other comments concerning E02 were received.

Response: The State of Connecticut provided DOI with a detailed map of E02 showing the

precise extent of its holdings. The boundary modification recommended by DOI follows the delineations provided by the State.

DOI Recommendation: The DOI recommends that the portions of E02 protected by the State of Connecticut be deleted from the CBRS.



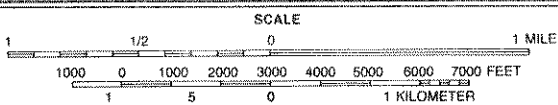
UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

Report to Congress on the Coastal Barrier Resources System

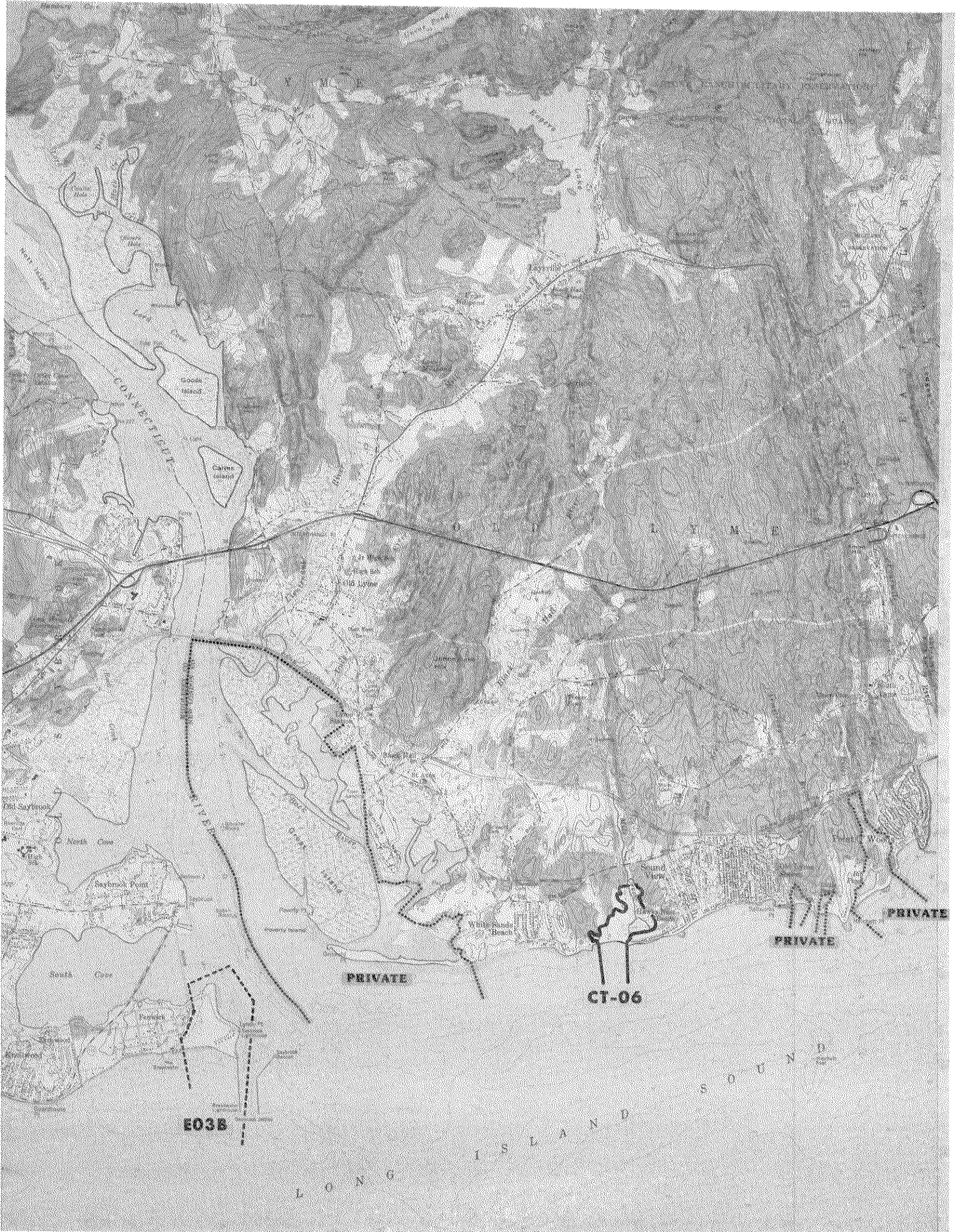
QUADRANGLE
NIANTIC
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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



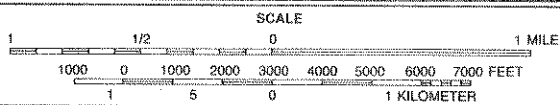
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
OLD LYME
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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

CT-06 - MILE CREEK

State Position: The State of Connecticut supports the CBRS expansion; however, no position on this particular unit was expressed.

Other Comments: One letter was received indicating that a privately owned structure, the Mile Creek Beach Club building, exists in proposed unit CT-06. It is reprinted below.

Response: The Mile Creek Beach Club building is the only structure in proposed unit CT-06. DOI's definition of an "undeveloped" barrier is a barrier with less than 1 structure per 5 acres of fastland. The proposed unit fully meets this definition and qualifies for addition to the CBRS.

DOI Recommendation: The DOI recommends that CT-06 be added to the CBRS as delineated.

1365

FROM THE DESK OF
ROBERT E. KNOX

6/11/87

DEAR FRANK,

AGAIN - THANK YOU FOR
TAKING THE TIME LAST THURSDAY
TO INFORM ME OF THE ACTIONS
REGARDING COASTAL BARRIERS.

I AM ENCLAVING, FOR YOUR
RECORDS, A COPY OF A LETTER
WHICH I HAVE JUST SENT
TO ALL OUR MEMBERS HERE AT
HAWKS NEST BEACH. I HAVE
SENT A COPY OF THIS SAME
LETTER TO MS LANZONI AND
HAVE ASKED HER TO BE PLACED
ON YOUR MAILING LIST.

THANKS AGAIN FOR YOUR
TIME AND HELP.

BEST REGARDS
R. E. KNOX



Dear Fellow Member,

On Sunday, April 12, 1987, an article "U.S. to Add to Coastal Barrier List" appeared in the Connecticut section of the N.Y. Times.

The article indicated that Mile Creek was one of the sites proposed. As I indicated at our annual meeting, "Federally subsidized flood insurance is not available in areas within the system, nor are Federal funds for such projects as roads, water lines, sewers, bridges, causeways or navigation channels."

The lack of Federally subsidized flood insurance would make it almost impossible for people to obtain mortgages.

I went to the Department of the Interior in Washington, D.C. on Thursday, June 4, 1987 and met with:

Mr. Frank B. McGilvrey
Coastal Barriers Coordinator
and
Ms. Deborah Lanzone
Manager, Coastal Barriers Task Force

to discuss our concerns, namely:

Mosquito & Tick Control
Groin Construction
Flood Insurance
Reimbursement for land value following
destruction of property by wave wash

Both Frank McGilvrey and Deborah Lanzone were very cooperative and helpful in providing answers to our concerns.

A) Mosquito and Tick Control - The State of Connecticut which currently provides control of Mile Creek will continue to provide control. The Federal program in no way supercedes the states program.

B) Groin Construction - As long as no Federal money is required to maintain our groin on Mile Creek, we are free to make necessary repairs at any time. We, of course, maintain our own Construction and Maintenance fund to handle such a situation.

C) Flood Insurance - None of our homes on Hawks Next Beach are within this newly applied for area of protection, so we are not affected. If we were within the designated area, it would be possible for us to continue our flood insurance and transfer coverage to a new owner as long as our building had not been destroyed in excess of 50%.

D) Reimbursement for land value following destruction of property by wave wash - This is a very nebulous situation, since it is FEMA who would be called upon to assist us in the event of severe damage to the property on our beach and FEMA has no money available to buy land. In some states, the state itself has set up funds for this purpose.

After having read the law, it would appear that as long as we are willing to do without any Federal aid, we can build homes, jetties, etc. as long as we comply with local and state laws.

Enclosed is an enlargement of the area (indicated CT-06) which is being applied for. It would appear that the "Mile Creek Beach Club" is the only structure within the proposal. Enclosed also is the magazine "Restless Ribbons of Sand" which Ms. Lanzone provided for us.

If you wish to individually comment on this proposed addition to the Coastal Barrier Act, you have until June 24, 1987 to write to:

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

We have requested that I be placed on the mailing list for any new activities and I donated to the Old Lyme-Phoebe Griffin Noyes Library copies of the following:

Undeveloped Environmental Statement, May 1983
Restless Ribbons of Sand
Report to Congress:
Coastal Barriers Resources System, Fed. 1987

My apologies for the length of this letter -- hope you'll understand.

HAWKS NEST ASSOCIATION
Robert E. Knox, Pres.



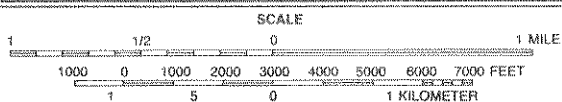
UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
ESSEX
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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



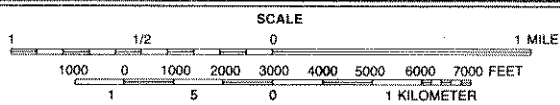
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
CLINTON
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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

E05 - HAMMONASSET POINT

State Position: The State of Connecticut opposes deleting otherwise protected barriers from the CBRS.

Other Comments: One letter was received opposing the proposed addition of associated aquatic habitat to E05 in the 1987 Draft Report. It is reprinted below.

Response: In 1987, DOI was not aware that all of E05 was protected by the State;

therefore, the Department proposed adding associated aquatic habitat to the existing unit. Because DOI recommends deleting the E05 barrier, all of the associated aquatic habitat is ineligible for addition to the CBRS under DOI criteria.

DOI Recommendation: The DOI recommends that E05 be deleted from the CBRS because it is protected by the State of Connecticut.

735

ROBINSON & COLE

DWIGHT H. MERRIAM
HARTFORD
203-278-8228

June 8, 1987

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

Re: Coastal Barrier Resources System, Associated Aquatic Habitat

Dear Madam or Sir:

As counsel to Mr. Jeffrey Shapiro of Cedar Island Marina in Clinton, Connecticut, we would like to comment on a proposed addition of Associated Aquatic Habitat to the Coastal Barrier Resources System.

After reviewing the study maps used by the Interior Department and based on our understanding of the intent of the Coastal Barrier Resources System, we believe a portion of the proposed Associated Aquatic Habitat to the west of Cedar Island Marina should be excluded from consideration. As can be seen from the enclosed map, the area adjacent to and west of Cedar Island Marina is currently used as a State Department of Environmental Protection and Army Corps of Engineers approved dredged material disposal area and the existing elevation is well above flood elevation. Because this area has been significantly modified, we contend its inclusion within the Associated Aquatic Habitat category is inappropriate. We therefore suggest that the Associated Aquatic Habitat line be moved further west to exclude the dredged material disposal area. This revision would retain the tidal wetlands and other aquatic habitat within the Associated Aquatic Habitat designation.

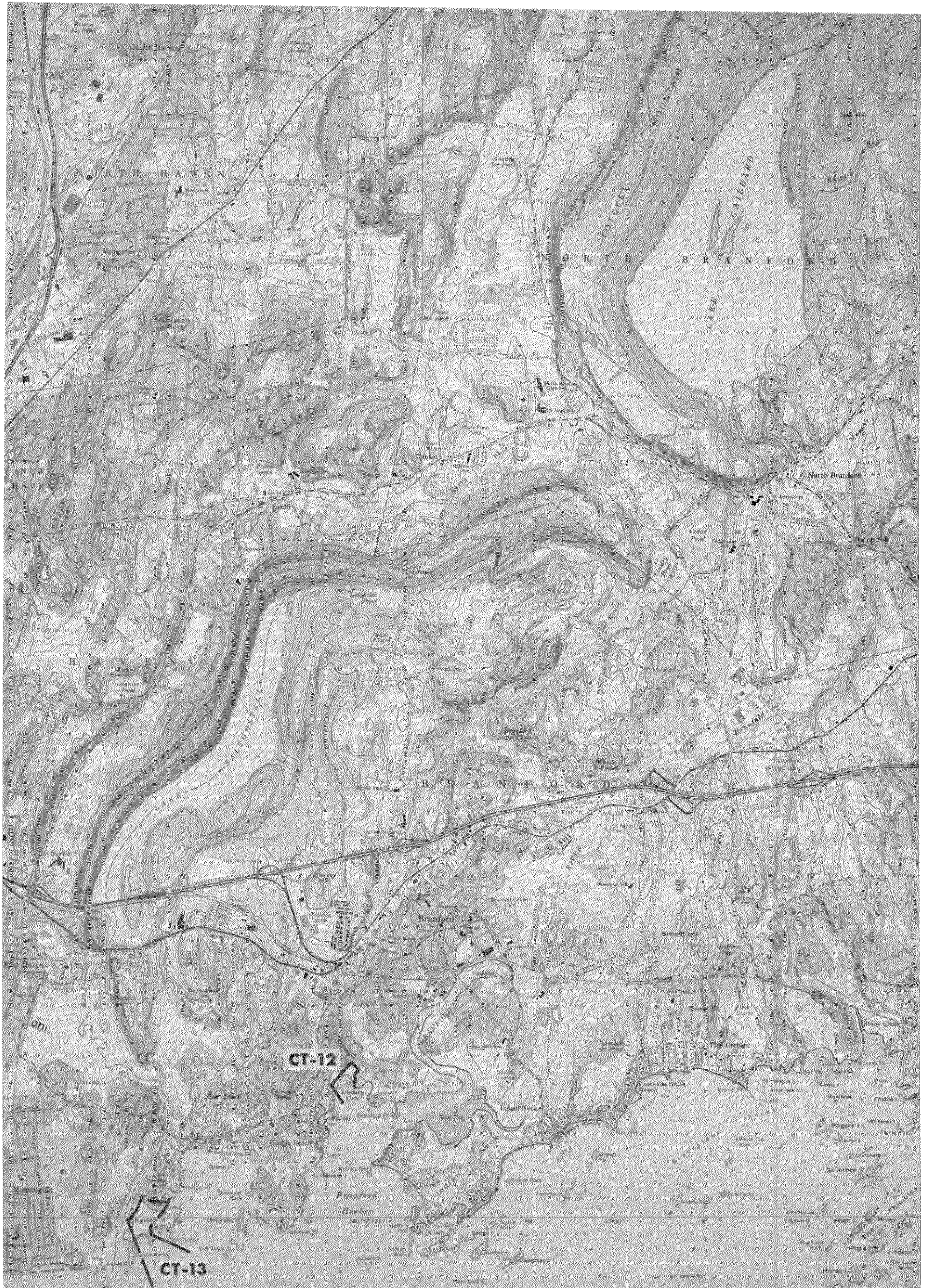
Thank you for your consideration of this matter. If you should have any questions, please contact me.

Very truly yours,


Dwight H. Merriam

DHM/jmc
Enclosures

LAW OFFICES
ONE COMMERCIAL PLAZA
HARTFORD, CONNECTICUT 06103-3587
203-278-8200
FINANCIAL CENTRE
POST OFFICE BOX 10305
STAMFORD, CONNECTICUT 06904-2305
203-354-1900
TELECOPIER HARTFORD 203-278-8269
TELECOPIER STAMFORD 203-359-8576
TELEX BOTH OFFICES 98-4407
PLEASE REPLY TO HARTFORD



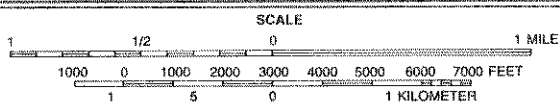
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
BRANFORD
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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



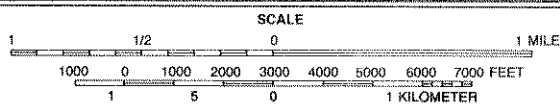
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

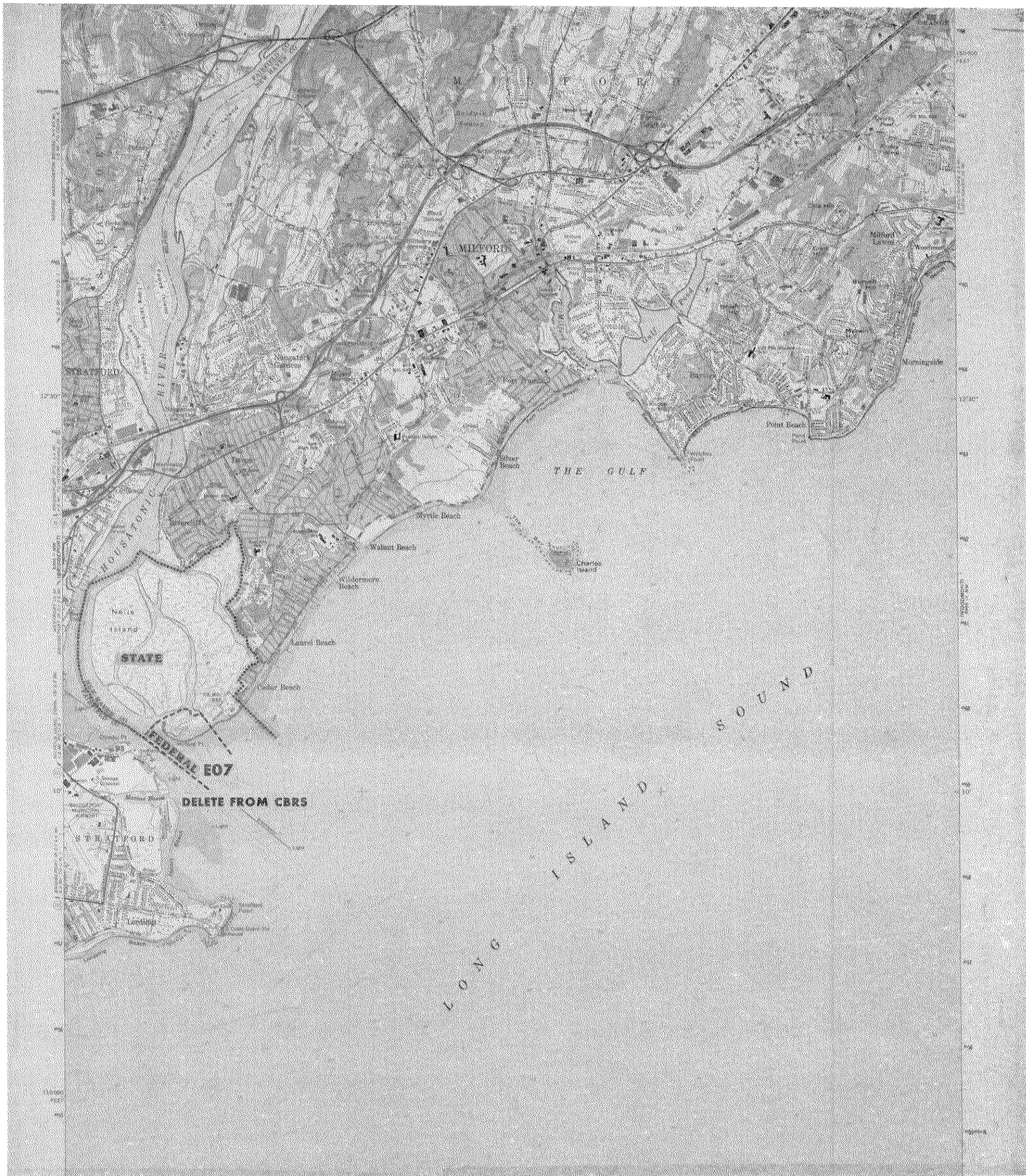
QUADRANGLE
NEW HAVEN
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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



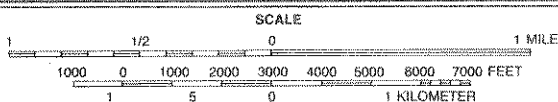
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
MILFORD
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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

E07 - MILFORD POINT

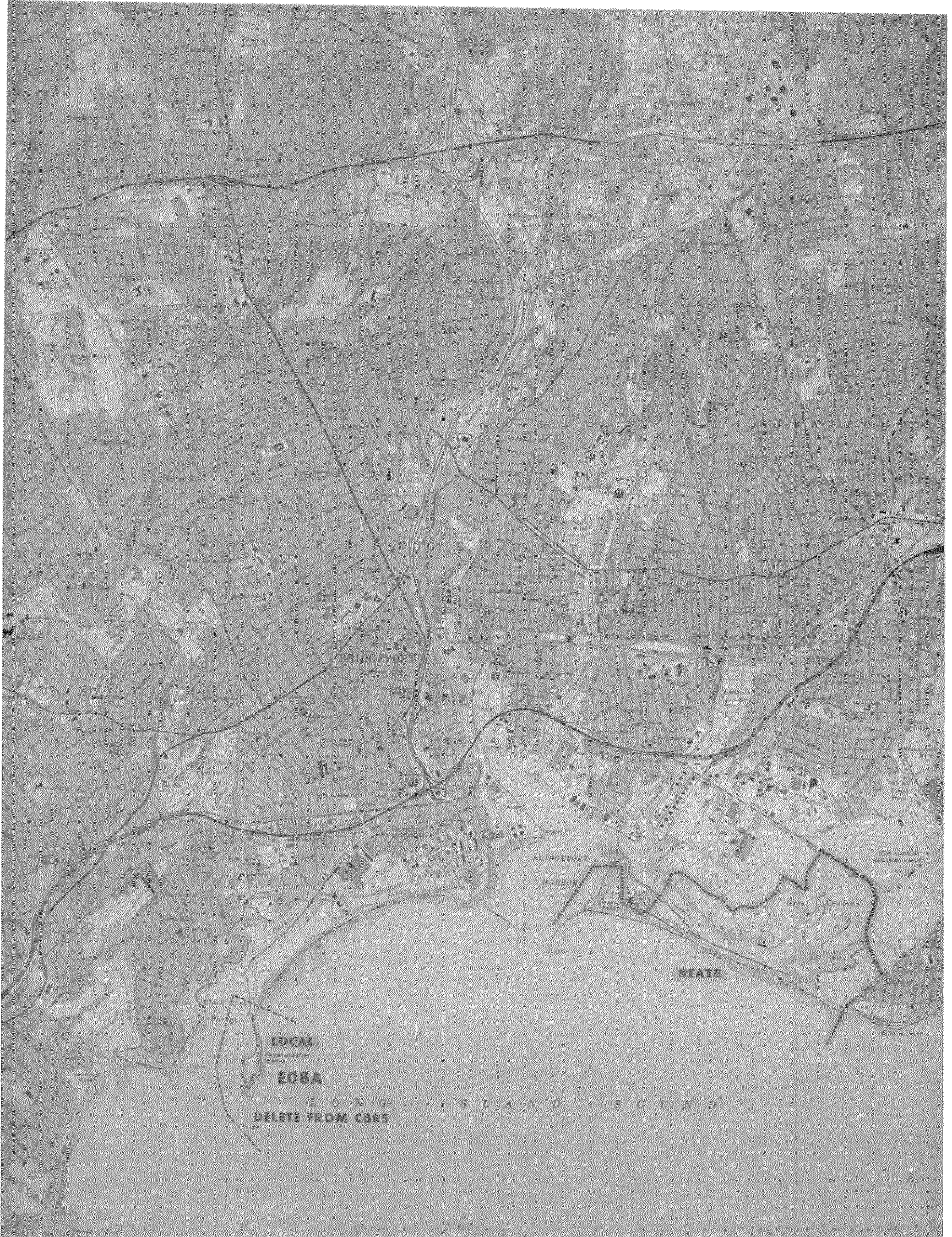
State Position: The State of Connecticut opposes deleting otherwise protected barriers from the CBRS.

Other Comments: No other comments were received concerning this unit.

Response: The DOI proposed an addition to E07 in the 1987 Draft Report; however,

this area, too, is otherwise protected (by the State).

DOI Recommendation: The DOI recommends that E07 be deleted from the CBRS because it is Federally protected; it is part of the National Wildlife Refuge System.



UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
BRIDGEPORT
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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

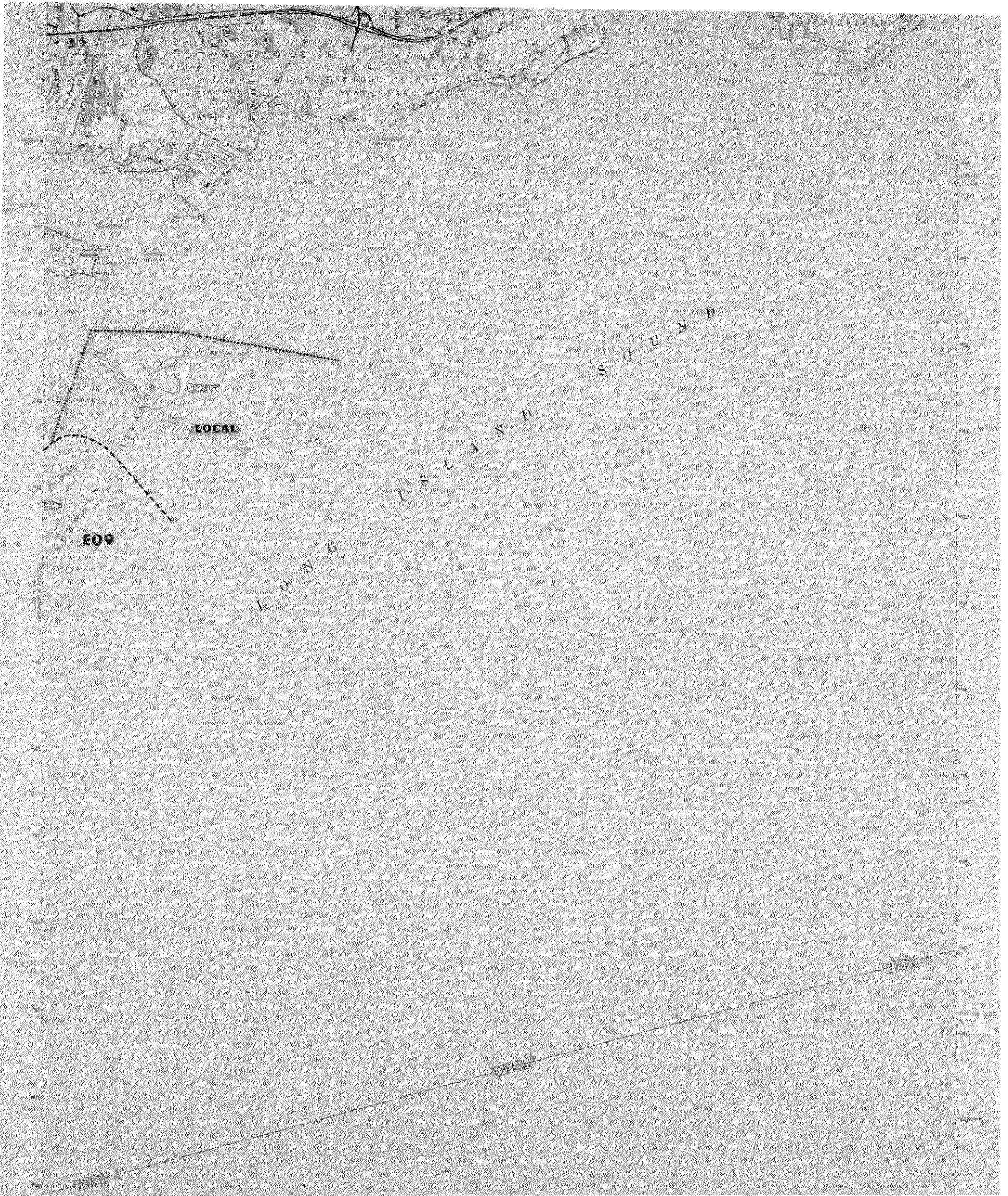
E08A - FAYERWEATHER ISLAND

State Position: The State of Connecticut opposes deleting otherwise protected barriers from the CBRS.

Other Comments: No other comments were received concerning this unit.

Response: All of Fayerweather Island is owned by the City of Newport and protected as Seaside Park.

DOI Recommendation: The DOI recommends that E08A be deleted from the CBRS because it is locally protected.



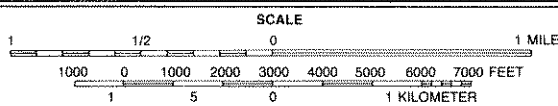
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

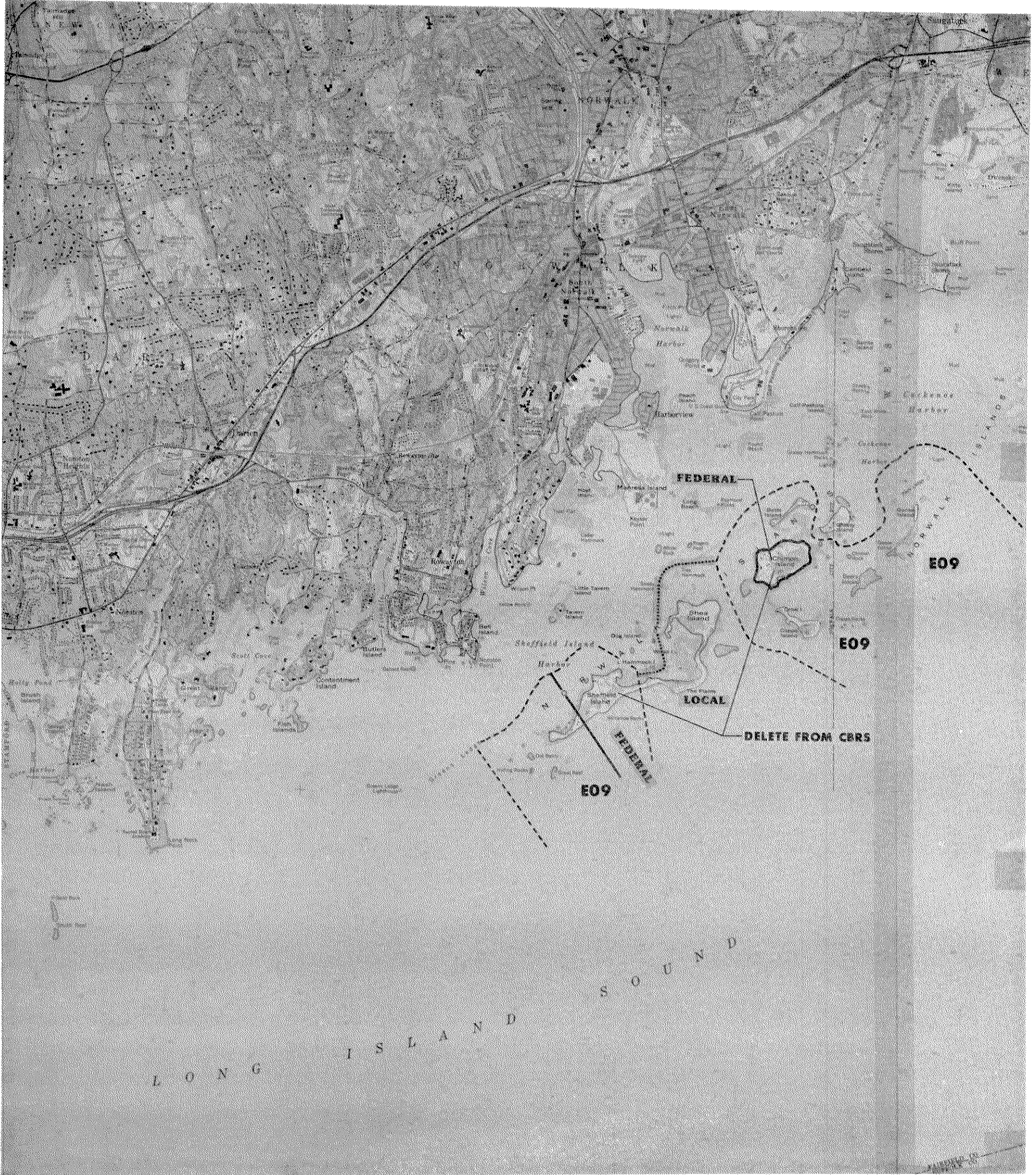
QUADRANGLE
SHERWOOD POINT
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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



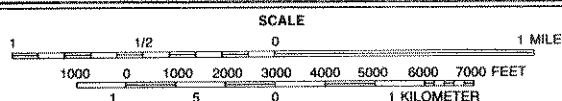
Report to Congress on the Coastal Barrier Resources System

UNITED STATES
DEPARTMENT OF THE INTERIOR



Mapped, edited and published
by the Coastal Barriers Study Group
U.S. Department of the Interior
Washington, D.C. 20240

QUADRANGLE
NORWALK SOUTH
CONNECTICUT



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
- - - - - Dash lines depict approximate boundaries of existing units in the Coastal Barrier Resources System, for reference purposes only.
- Dotted lines depict approximate boundaries of an undeveloped coastal barrier that is "otherwise protected" or a military or coast guard property.



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

E09 - NORWALK ISLANDS

State Position: The State of Connecticut opposes deleting otherwise protected barriers from the CBRS.

managed by the U.S. Fish and Wildlife Service. There are some privately owned inholdings on the islands.

Other Comments: No other comments concerning E09 were received.

DOI Recommendation: The DOI recommends that the portions of E09 that are Federally protected be deleted from the CBRS. The DOI also recommends that the privately owned inholdings remain in the CBRS.

Response: Much of the Norwalk Islands is part of the National Wildlife Refuge System