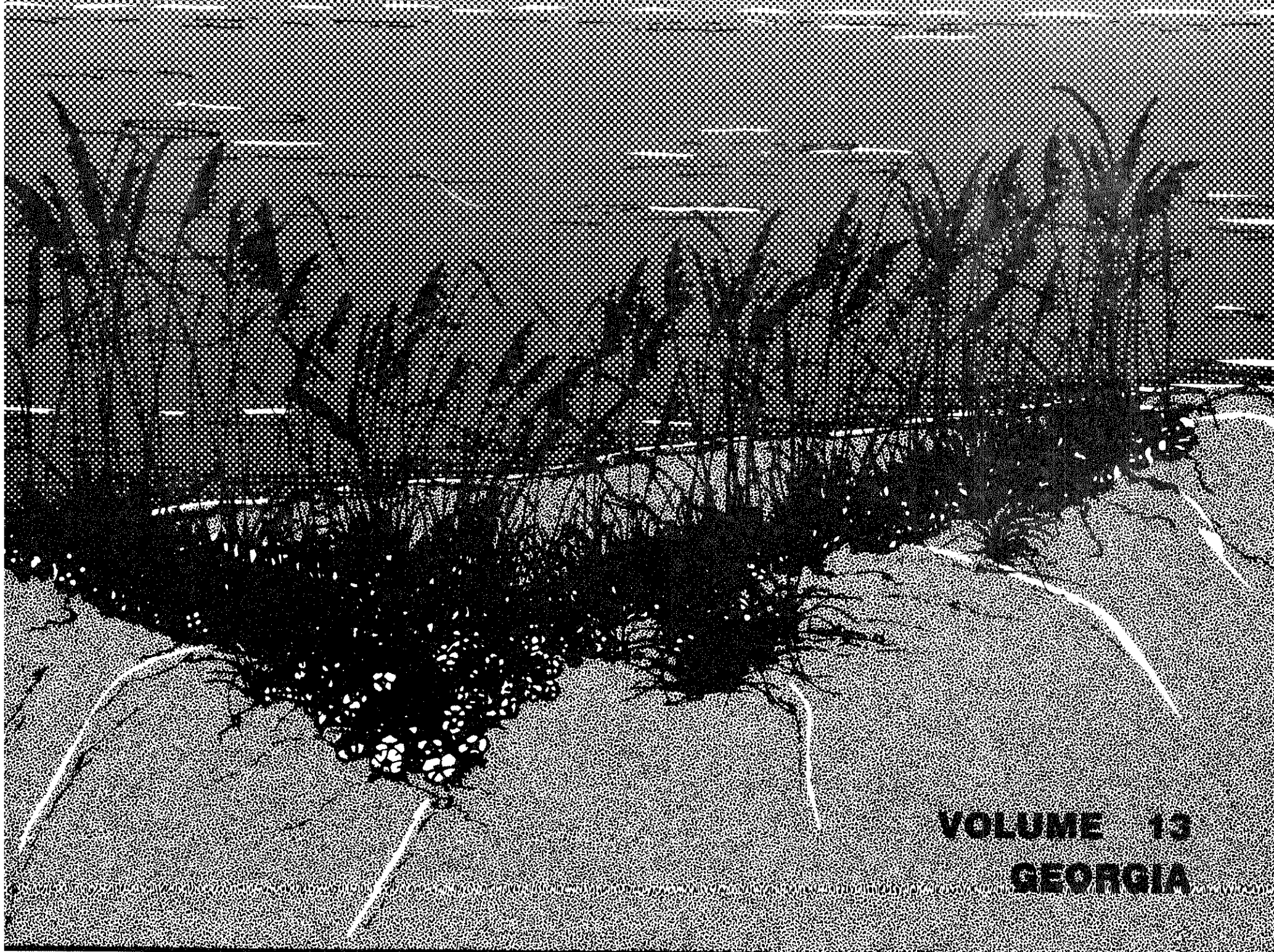


# **REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM**

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



**VOLUME 13  
GEORGIA**

U.S. Department of the Interior



**REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM**

**VOLUME 13**

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

**GEORGIA**

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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## GEORGIA

### 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 Georgia 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 Georgia 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 Sea Islands of the Georgia coast are an interrelated system of relatively short and wide barrier islands and back barrier marshes, separated by tidal inlets and sounds. The 18 barrier islands protect extensive coastal marshlands located between the mainland and the barriers. The coast has approximately 94 miles of oceanfront beach and over 500,000 acres of adjacent marshlands.

The economy of the State, in general, is dominated by manufacturing, construction, agriculture, fisheries, retail trade, and service industries. The economy of coastal Georgia is based primarily on forests, fisheries, waterways, and natural and historic features. Two major ports, Savannah and Brunswick, handle extensive cargo transportation in the region. Another industry prominent in the coastal area and related to forest products is paper and pulp processing. Several pulp mills are located in the Brunswick and Savannah regions.

The State has abundant natural resources because of its extensive back barrier salt marsh complexes and numerous rivers and sounds. Aquatic resources include oysters, clams, shrimp, crab, menhaden, spotted sea-trout, kingfish, drum, bluefish, flounder, and sheepshead. Transient and wintering waterfowl are found in coastal waters, and

shorebirds and marshbirds on beaches and in marshes. Loggerhead turtles nest annually on most of the coastal barriers.

## COASTAL RESOURCE MANAGEMENT

### Georgia Coastal Resource Management

The Georgia Department of Natural Resources and Coastal Resources Division (CRD) are the State's principal policy-making branches concerned with coastal resources. The CRD functions in three main areas: marine and estuarine fisheries; shore, beach, and tidal wetlands protection; and coastline management. Georgia has not joined the Coastal Zone Management Program at the Federal level. The Coastal Protection Section of CRD protects and manages the coastal marshlands, ocean beaches, and sand dune systems.

### Permits

A three-member Coastal Marshlands Committee issues permits under the Coastal Marshlands Protection Act of 1970. A Shore Assistance Committee (SAC) similarly assures conservation and environmentally sound use of dunes, beaches, and offshore sandbars through permits mandated by the Shore Assistance Act of 1979. The State is considering amending this Act to include stronger language defining the State's jurisdiction in permitting procedures. Also, a tentative reevaluation is being made concerning possible participation in the Federal Coastal Resources Management Program.

### Taxes

The Facade and Conservation Easement Act of 1976 establishes a legal framework for conservation easement of land in Georgia. The Act requires local tax assessors to reappraise the value of the property in which an easement has been established. Several agencies, such as the Georgia Conservancy and The Nature Conservancy, accept conservation easements.

The development of a coastal management program in Georgia has been relatively slow. This is partly due to limited development

pressures in the coastal zone. The recent establishment of a task force on Tybee Island, concerned principally with the effects of channel maintenance on the Savannah River ship channel and its subsequent impact on the beaches of Tybee Island, suggests willingness at the State level to deal more directly with coastal issues.

## EXISTING CBRS UNITS

The existing CBRS units are all located on or within barrier islands and include some associated wetlands. The only unit likely to be affected by development pressure is Sea Island (N04) which is a spit on the southern end of Sea Island. It has some resort, home, and recreational development. The other units are accessible by boat only and are adjacent to, surrounded by, or in protected land ownership situations.

A brief description of each existing CBRS unit in Georgia is provided below. Each unit is identified by its ID code and name (established by Congress in 1982) and the county in which it is located.

N01-Little Tybee Island (Chatham). This unit is a low-lying barrier with maximum elevations of 10 ft. It is characterized by multiple dune ridges and extensive salt marshes. Large waterfowl populations winter on the island.

N01A-Wassaw Island (Chatham). This unit is an enclave within the boundaries of the Wassaw National Wildlife Refuge. The barrier island is characterized by multiple dune ridges with associated tidal wetlands. Over 200 species of birds are found on Wassaw Island.

N03-Little St. Simons Island (Glynn). This island has 6.1 miles of beachfront which shelter extensive tidal marshlands and open water. A small development of a dozen buildings is located on the island. The island has been used as a hunting preserve and is reported to have the most diverse bird habitat in the State. Deer and cattle have caused some overgrazing in the dune areas. The island development is run as a private hotel for naturalists.

## CBRS UNITS IN GEORGIA ESTABLISHED BY CONGRESS, 1982

Unit Name	Unit ID Code	County	Shoreline Length (miles)	Total Area (acres)	Fastland Area (acres)
Little Tybee Island	N01	Chatham	5.0	7,888.6	905.3
Wassaw Island	N01A	Chatham	0.2	314.2	157.8
Little St. Simons Island	N03	Glynn	6.7	12,610.0	1,851.7
Sea Island	N04	Glynn	1.6	438.2	266.2
Little Cumberland Island	N05	Camden	0.3	1,639.7	272.5
Cumberland Island	N06	Camden	2.4	10,182.2	1,672.9
Totals:			16.2	33,072.9	5,126.4

N04-Sea Island (Glynn). This unit is a sand spit located on the south end of Sea Island. No structures are located on the spit. Access is limited to pedestrian beach use from the developed area north of the unit.

N05-Little Cumberland Island (Camden). This unit is primarily vegetated dune ridges, tidal creeks, and marshlands. Some private homes are located on Little Cumberland Island but access is strictly limited to boats.

N06-Cumberland Island (Camden). This unit is surrounded by the Cumberland Island National Seashore. It includes beachfront and associated dune environments, saltwater and brackish water marshlands, and open water. Large waterfowl populations inhabit the island. Wild horses on the island cause some trampling of dune vegetation and promote dune migrations.

#### RECOMMENDED ADDITIONS AND MODIFICATIONS

The Department of the Interior recommends that all undeveloped, unprotected coastal barriers and associated aquatic habitat identified in Georgia be added to the Coastal Barrier Resources System. The DOI also recommends that all military and Coast Guard lands on coastal barriers be excluded from the CBRS. Drum Point Island, part of the Cumberland Island unit (N06), is owned by the Navy; therefore, the Department recommends that it be deleted from the unit. A table presenting the Department's position on each unit identified in Georgia follows this discussion.

The DOI recommends that all otherwise protected, undeveloped coastal barriers also be excluded 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, undeveloped coastal barriers, including suggested guidelines for acceptable development, appears in Volume 1. Maps of all otherwise protected, undeveloped coastal barriers in Georgia appear in the following section.

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 Georgia reviewed the 1987 Draft Report and opposes all the proposed additions to the CBRS in Georgia. The State expressed no opinion on the DOI's general recommendations.

The Department received 8 other comment letters concerning Georgia; half supported the CBRS additions and half opposed them. Three letters objected to deleting military land from the CBRS. The Georgia Conservancy suggested that an additional 400,000 acres might qualify for addition to the CBRS in Georgia. The DOI has inventoried the Georgia coast completely and all qualified undeveloped, unprotected coastal barriers and associated aquatic habitat are recommended for addition to the CBRS. Substantive comments concerning individual existing or proposed CBRS units are discussed and reprinted in the following section, interspersed with the appropriate maps.

#### SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN GEORGIA

Unit ID Code <sup>a</sup>	Unit Name <sup>b</sup>	County	Congress. Dist. <sup>c</sup>	Shore-line Length (miles) <sup>d</sup>	Total Area (acres) <sup>e</sup>	Fast-land Area (acres) <sup>f</sup>	Recommendation <sup>g</sup>
N01	Little Tybee Island	Chatham	1	6.8	18,216	905	Add wetlands to existing CBRS unit
N01A	Wassaw Island	Chatham	1	0.2	314	158	No change to existing CBRS unit
N03	Little St. Simons Island	Glynn	1	6.7	15,617	1,852	Adjust landward boundary and add wetlands to existing CBRS unit
N04	Sea Island	Glynn	1	1.6	1,404	266	Adjust Sea Island Road boundary to delete filled and elevated area; add wetlands to existing CBRS unit

(continued)

SUMMARY OF RECOMMENDATIONS FOR COASTAL BARRIERS IN GEORGIA (CONCLUDED)

Unit ID Code <sup>a</sup>	Unit Name <sup>b</sup>	County	Congress. Dist. <sup>c</sup>	Shore-line Length (miles) <sup>d</sup>	Total Area (acres) <sup>e</sup>	Fast-land Area (acres) <sup>f</sup>	Recommendation <sup>g</sup>
N05	Little Cumberland Island	Camden	1	2.2	11,998	804	Add undeveloped inholdings and wetlands to existing CBRS unit
N06	Cumberland Island	Camden	1	2.4	16,706	1,521	Delete military (Navy) land and add wetlands to existing CBRS unit
Total - CBRS as Recommended				19.9	64,255	5,506	
Existing CBRS				16.2	33,073	5,126	
Net Change in CBRS				+3.7	+31,182	+380	

<sup>a</sup>UNIT ID CODE - State initials (GA) plus a number identify a proposed new unit. An existing unit is identified by the legal code letter (N) and number established by Congress in 1982.

<sup>b</sup>UNIT 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.

<sup>c</sup>CONGRESSIONAL DISTRICT - U.S. Congressional District in which unit is located.

<sup>d</sup>SHORELINE LENGTH - For existing units with additions or deletions, this length is for the entire unit, as modified.

<sup>e</sup>TOTAL AREA - For existing units with additions or deletions, this area is for the entire unit, as modified.

<sup>f</sup>FASTLAND 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.

<sup>g</sup>RECOMMENDATION - 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

1284



STATE OF GEORGIA  
OFFICE OF THE GOVERNOR  
ATLANTA 30334

Joe Frank Harris  
GOVERNOR

June 4, 1987

Honorable Donald Paul Hodel  
Secretary of the Interior  
U.S. Department of the Interior  
Washington, D.C. 20240

Dear Secretary Hodel:

This letter is in response to the "Draft Report to the Congress: Coastal Barrier Resources System, Executive Summary, May 1987," and accompanying "Volume 13, Georgia, February 1987."

On July 8, 1985, I transmitted to you my comments on an earlier version of the proposed Coastal Barrier Resources System (CBRS) in Georgia. That version would have greatly expanded the geographical coverage of the system in Georgia, extending a blanket prohibition on federal funding assistance to all of Georgia's undeveloped barrier islands and associated wetlands.

I am pleased to note that the Department of the Interior has adjusted its recommendations in response to previous comments. I remain concerned, however, that the Department of the Interior continues to recommend inclusion of thousands of acres of Georgia's coastal marshlands which are already protected under Georgia's Coastal Marshland Protection Act of 1970 and applicable federal law.

Inasmuch as I can find no justifications for the proposed additions to the CBRS in Georgia, I must oppose efforts to amend the Act to include those additions.

Thank you for the opportunity to review the Draft Report to Congress.

With kindest regards, I remain

Sincerely,

Joe Frank Harris

IFH/msc

cc: - Honorable Sam Nunn, U. S. Senator  
Honorable Wyche Fowler, U. S. Senator  
Honorable Lindsay Thomas, U. S. Representative  
Commissioner J. Leonard Ledbetter, Georgia Department of Natural Resources  
Mr. P. David Privett, Assistant Secretary for Fish and Wildlife and Parks  
Mr. P. Daniel Smith, Deputy Assistant Secretary for Fish and Wildlife and Parks

OTHER GENERAL COMMENT LETTERS CONCERNING GEORGIA

1141

ATLANTA AUDUBON SOCIETY

P.O. Box 38214, Atlanta, Georgia 30334  
404 321-6079



June 19, 1987

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

Dear Coastal Study Group,

I would like to comment on the draft report for the Coastal Barrier Resources Act on behalf of the Atlanta Audubon Society, a volunteer conservation organization with 3,500 members in northern Georgia.

We agree with the proposed expansion of the System. In addition to the recommended additions to the system in Georgia, we agree with the Department's consultants for Georgia: an additional 450,000 acres of the Georgia should be covered under the Act.

We also feel that military lands should not be excluded and that existing units should not be reduced in size (Alabama unit Q01 is a case in point). We would also urge you to include Great Lakes and Pacific areas eligible for coverage.

The recent Congressional testimony documenting the impact of the Greenhouse Effect reinforces the need to protect barrier island and marsh systems as the Earth's mean sea level continues to rise.

Sincerely,

*Mark Oberle*  
Mark Oberle, MD  
Conservation Director



Glenn Lewis & ASSOCIATES  
106 Redfern Village  
St. Simons Island, Georgia  
31522

944

Associates

Glenn A. Lewis, CRB  
Dor C. Wright, GRI  
Joan A. Lewis, CRS  
Dorcas E. Leland  
J. Neasey Booth  
M. Ada Petrick  
Linda T. Monroe  
J. Mar Mason  
Gail P. Baines, GRI  
Jesse O. Herbert

Area Code 912  
638-8229

June 16, 1987

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

Dear Sirs:

As a Realtor and a property owner I am strongly opposed to the widescale expansion of the Coastal Barrier Resources System. I feel that the expansion of boundaries of the System is an infringement on private property rights. I strongly encourage the Department of Interior to make further studies into the socioeconomic impact that changes in the System would make on areas that are involved.

Thank you for any consideration that you might give to addressing this matter with care and concern for the private property owner.

Respectfully,

*Joan A. Lewis*

Joan A. Lewis, G.R.I., CRS  
Associate Broker



Commitment to Professionalism  
CRS - Certified Residential Specialist, National Association of Realtors  
GRI - Graduate Realtors Institute, Georgia Association of Realtors

JUN 22



1114



Brunswick-Glynn County Board of Realtors®

P.O. BOX 1312  
BRUNSWICK, GEORGIA 31521  
1-912-264-2915

1593

June 16, 1987

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

Dear Sirs:

The Brunswick-Glynn County Board of REALTORS are opposed to the widescale expansion of the Coastal Barrier Resources System. We feel that the expansion of boundaries of the System is an infringement on private property rights. We strongly encourage the Department of Interior to make further studies into the socioeconomic impact that changes in the System would make on areas that are involved.

We appreciate any consideration that you might give to addressing this matter with care and concern for the private property owner.

Respectfully,

*Ronnie Perry*

Ronnie Perry  
President  
Brunswick-Glynn County  
Board of Realtors

May 29, 1987

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

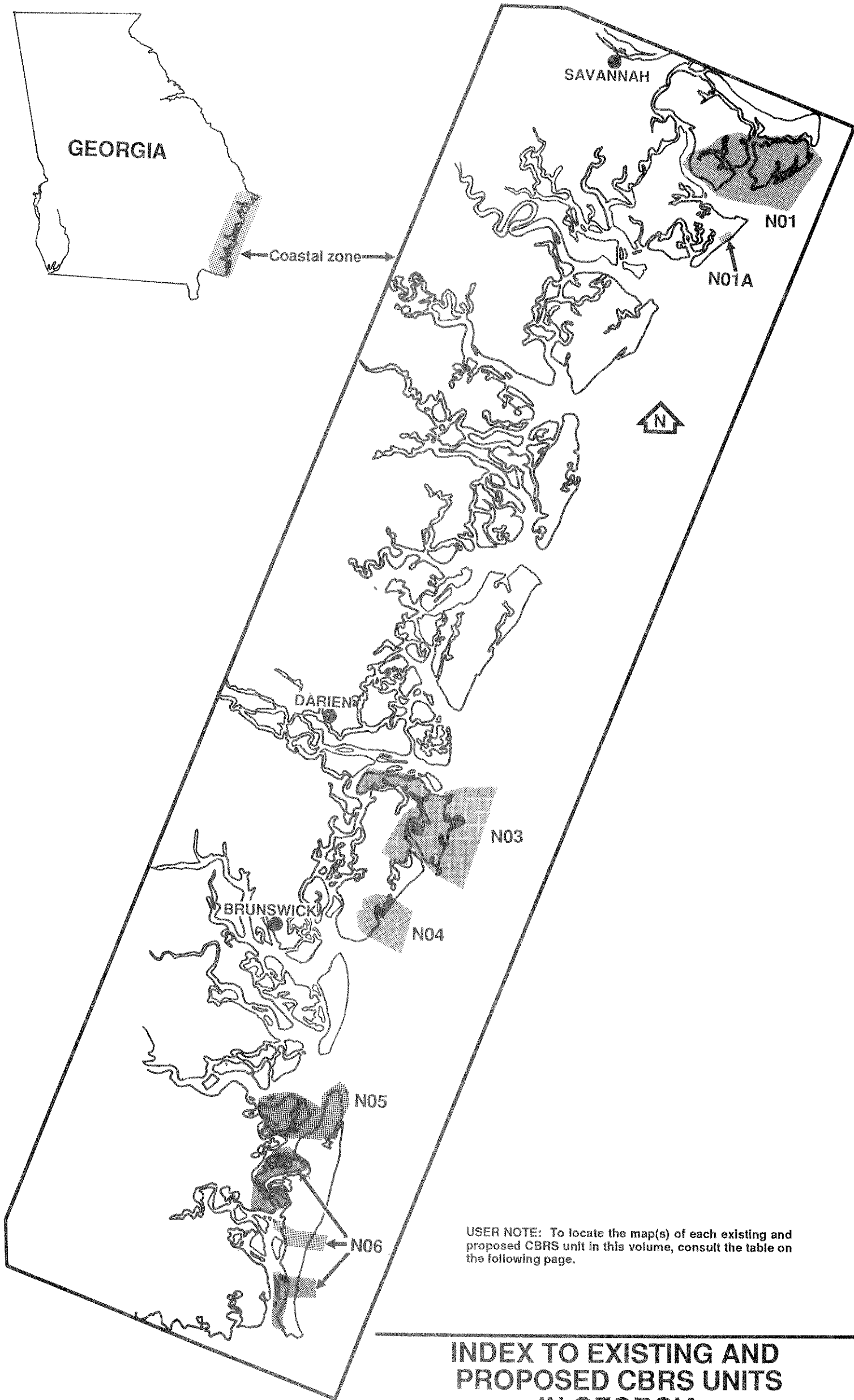
Dear Sirs:

Please be advised that as a concerned citizen, I strongly support the proposed addition of 1,010,046 new acres in the Coastal Barrier Resources System including areas in the Florida Keys, the U.S. Virgin Islands, Puerto Rico, Maryland, New Jersey, large embayments, and adjacent aquatic habitats. I also urge the inclusion of the Great Lakes and the Pacific coast in the system. I oppose the deletion of military and Coast Guard lands from the system. Please help save America's coastline!

Sincerely,

Cynthia Lord  
725 Dykes Dr  
Savannah, Ga 31406





**INDEX TO EXISTING AND  
PROPOSED CBRS UNITS  
IN GEORGIA**

MAPS DEPICTING EXISTING AND PROPOSED CBRS UNITS

Unit ID Code	Unit Name	USGS Topographic Map or Map Composite	Page
N01	Little Tybee Island	Tybee Island South	10
		Isle of Hope	11
N01A*	Wassaw Island	Wassaw Sound	12
N03*	Little St. Simons Island	Wassaw Sound	12
		Altamaha Sound	22
		Darien	23
		Sea Island	24
N04*	Sea Island	Sea Island	24
N05*	Little Cumberland Island	Cumberland Island N.	28
N06*	Cumberland Island	Cumberland Island N.	28
		Cumberland Island S.	29

\*Public comment summaries and DOI responses follow unit maps.

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

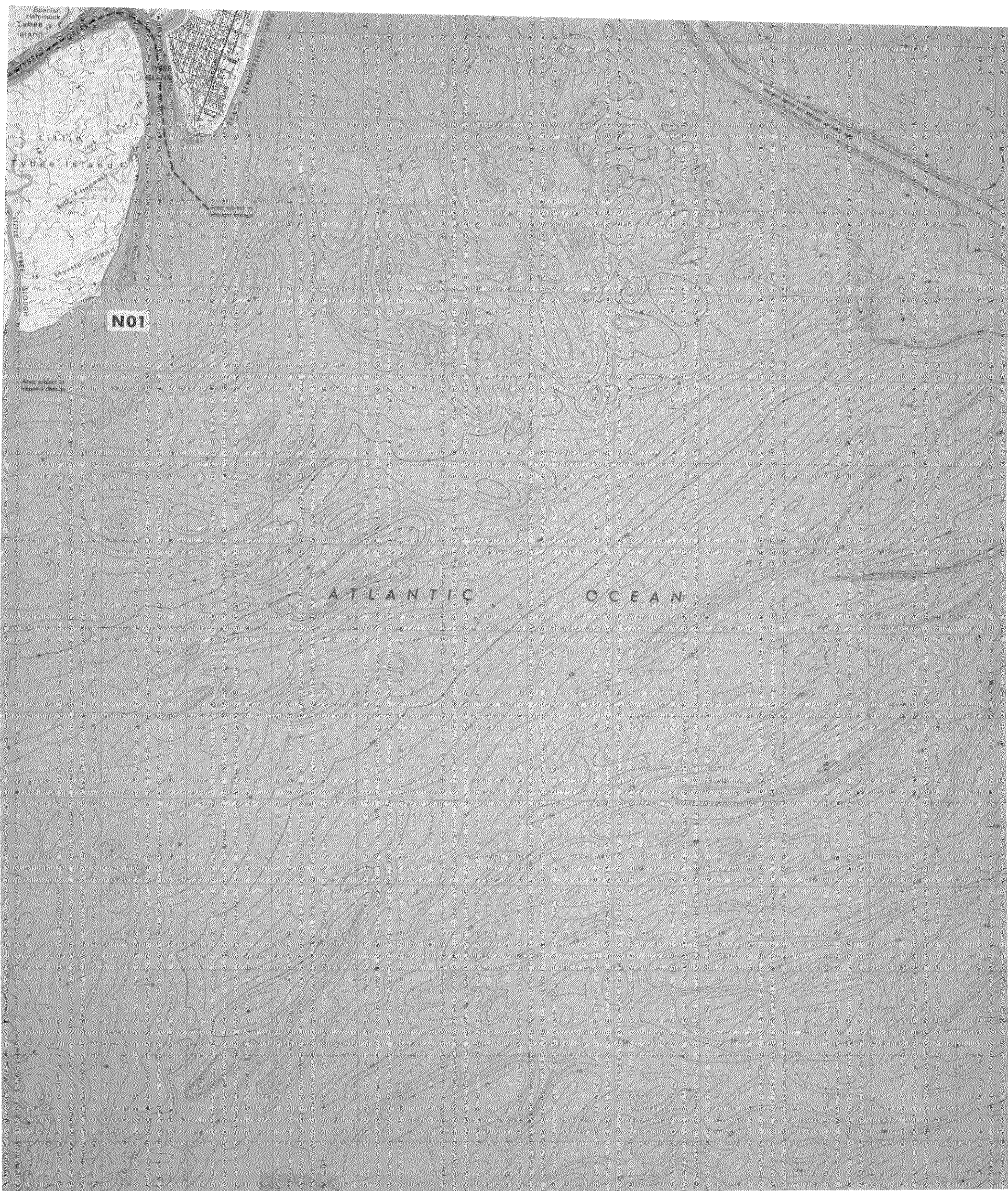
USGS Topographic Map or Map Composite	Coastal Barrier Status	Page
Isle of Hope	Federal	11
Wassaw Sound	Federal	12
Raccoon Key	Federal, State	14
Oak Level	State	15
St. Catherines Sound	Federal, State, Private	16
Seabrook	Federal	17
Sapelo Sound	Federal, State, Private	18
Shellman Bluff	Federal, State	19
Cabretta Inlet	Federal, State	20
Doboy Sound	State	21
Altamaha Sound	Federal, State	22
Darien	State	23
Jekyll Island	State	27
Cumberland Island North	Federal	28
Cumberland Island South	Federal, Military	29

\*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 unit
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 north to south.



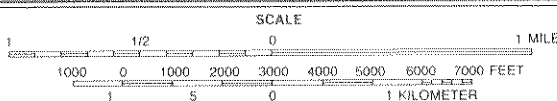
**Report to Congress on the Coastal Barrier Resources System**

**UNITED STATES  
DEPARTMENT OF THE INTERIOR**



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U.S. Department of the Interior  
Washington, D.C. 20240

QUADRANGLE  
**TYBEE ISLAND SOUTH**  
GEORGIA



- 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.



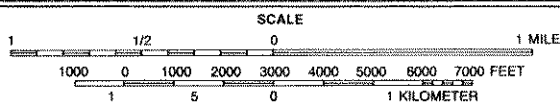
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**UNITED STATES  
DEPARTMENT OF THE INTERIOR**



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Washington, D.C. 20240

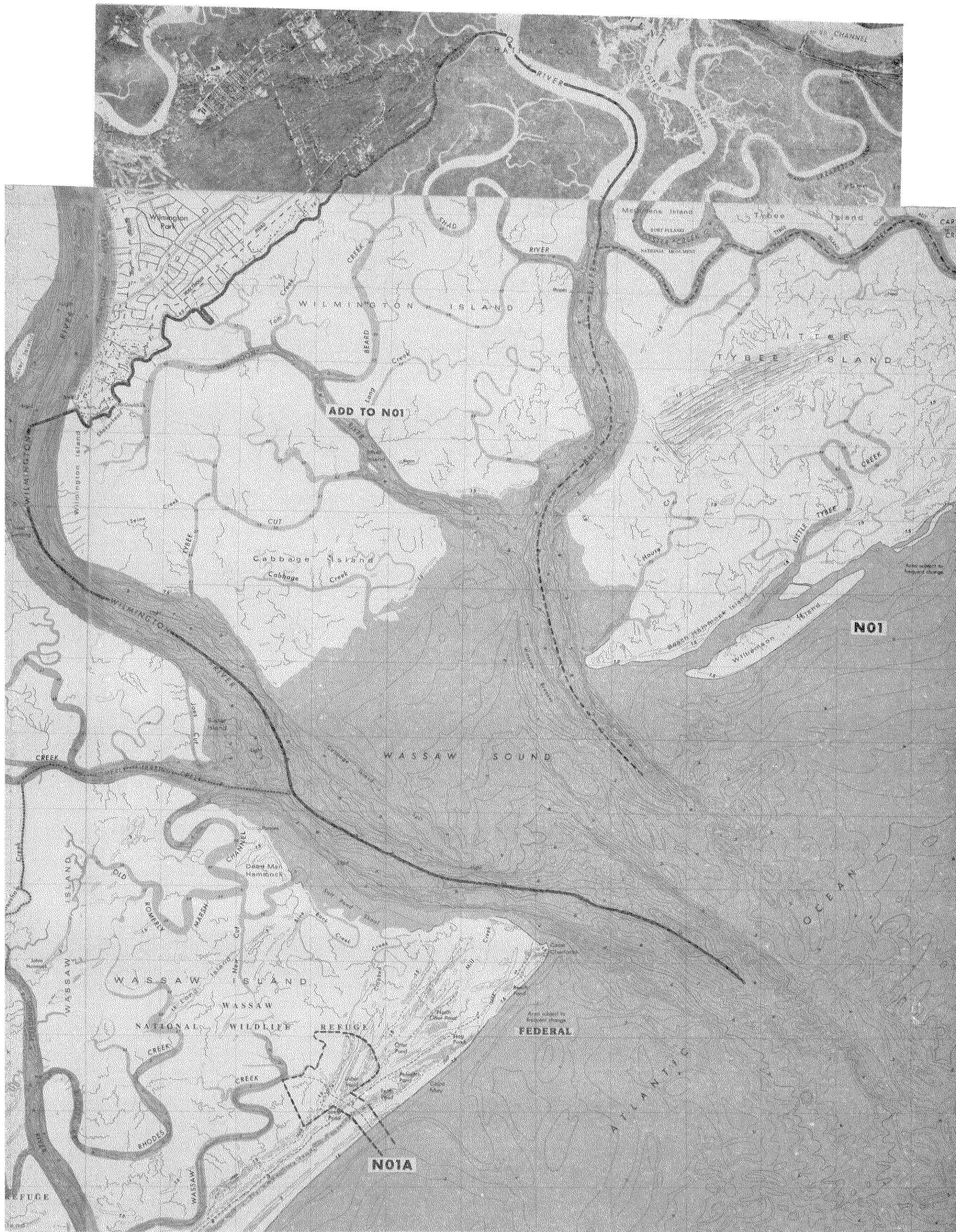
QUADRANGLE  
**ISLE OF HOPE**  
GEORGIA



- 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.



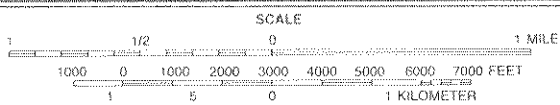
**Report to Congress on the Coastal Barrier Resources System**

UNITED STATES  
DEPARTMENT OF THE INTERIOR



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U.S. Department of the Interior  
Washington, D.C. 20240

QUADRANGLE  
**WASSAW SOUND**  
GEORGIA



- 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.

NOIA - WASSAW ISLAND

State Position: The State of Georgia opposes any additions to the Georgia CBRS units.

Other Comments: One letter was received suggesting that Green Island, Petit Gauke Hammock Island, Rose Dhu Island and adjacent wetlands be added to the CBRS. The letter is reprinted below.

Response: None of these islands are coastal barriers; they are all Coastal Plain remnants that abut the mainland. Under DOI criteria, they do not qualify for addition to the CBRS.

DOI Recommendation: The DOI recommends no change in the existing delineation of NOIA.



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

1282

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.

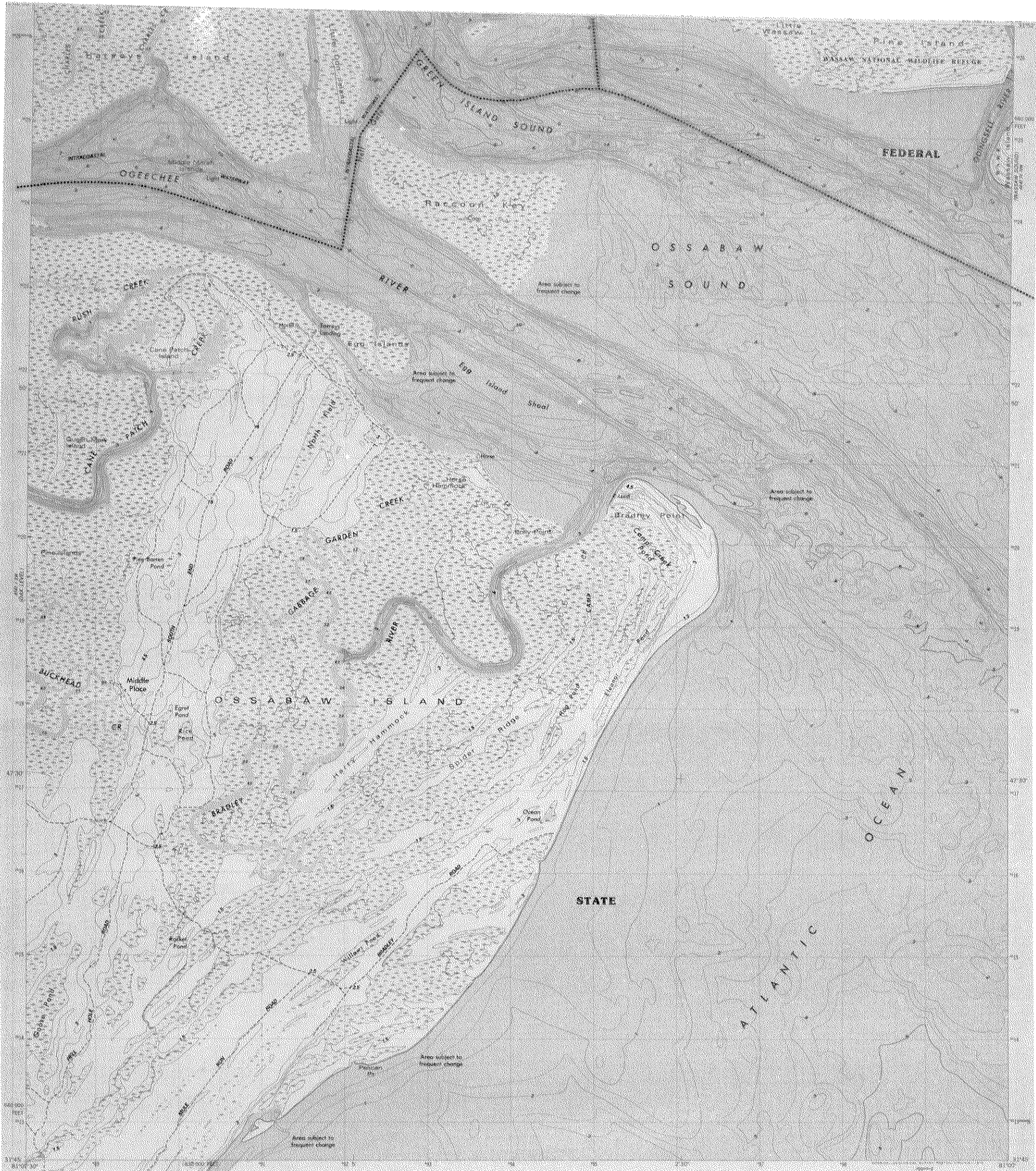
APPENDIX

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.

Georgia

N-014 Wassaw Island  
Unit N-014 should be expanded to include Green Island, Petit Gauke Hammock Island, Rose Dhu Island and adjacent wetlands.



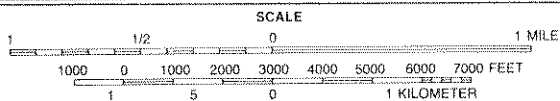
**Report to Congress on the Coastal Barrier Resources System**

**UNITED STATES  
DEPARTMENT OF THE INTERIOR**



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QUADRANGLE  
**RACCOON KEY**  
GEORGIA



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





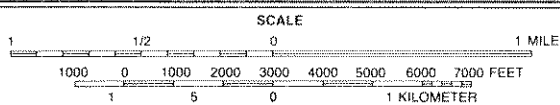
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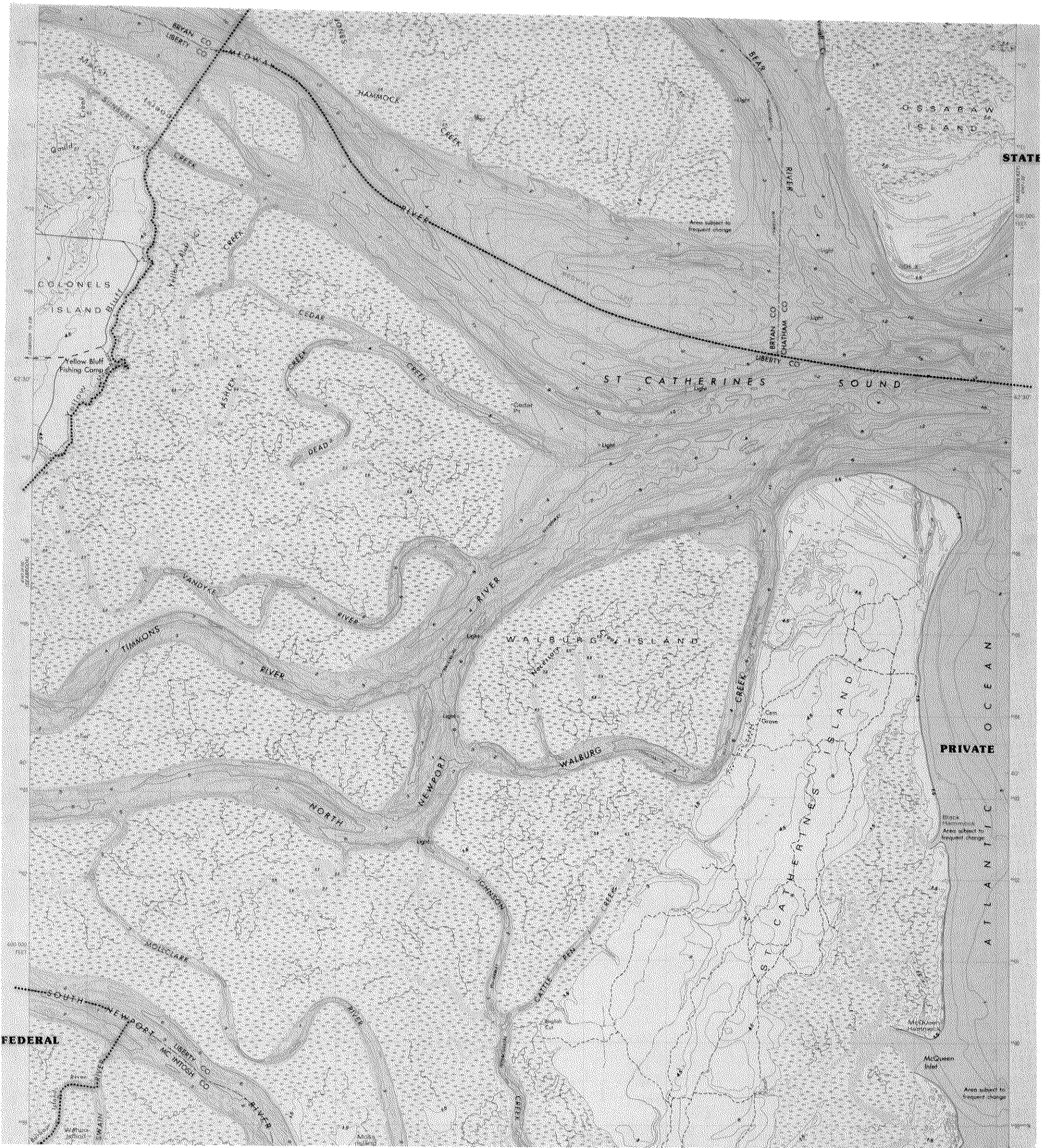
QUADRANGLE  
**OAK LEVEL**  
GEORGIA



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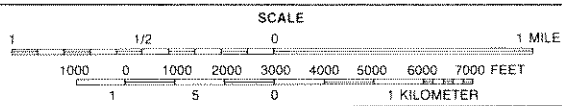
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QUADRANGLE  
**ST. CATHERINES SOUND**  
GEORGIA



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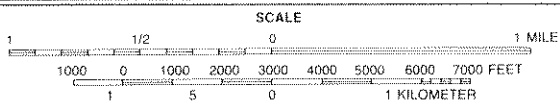
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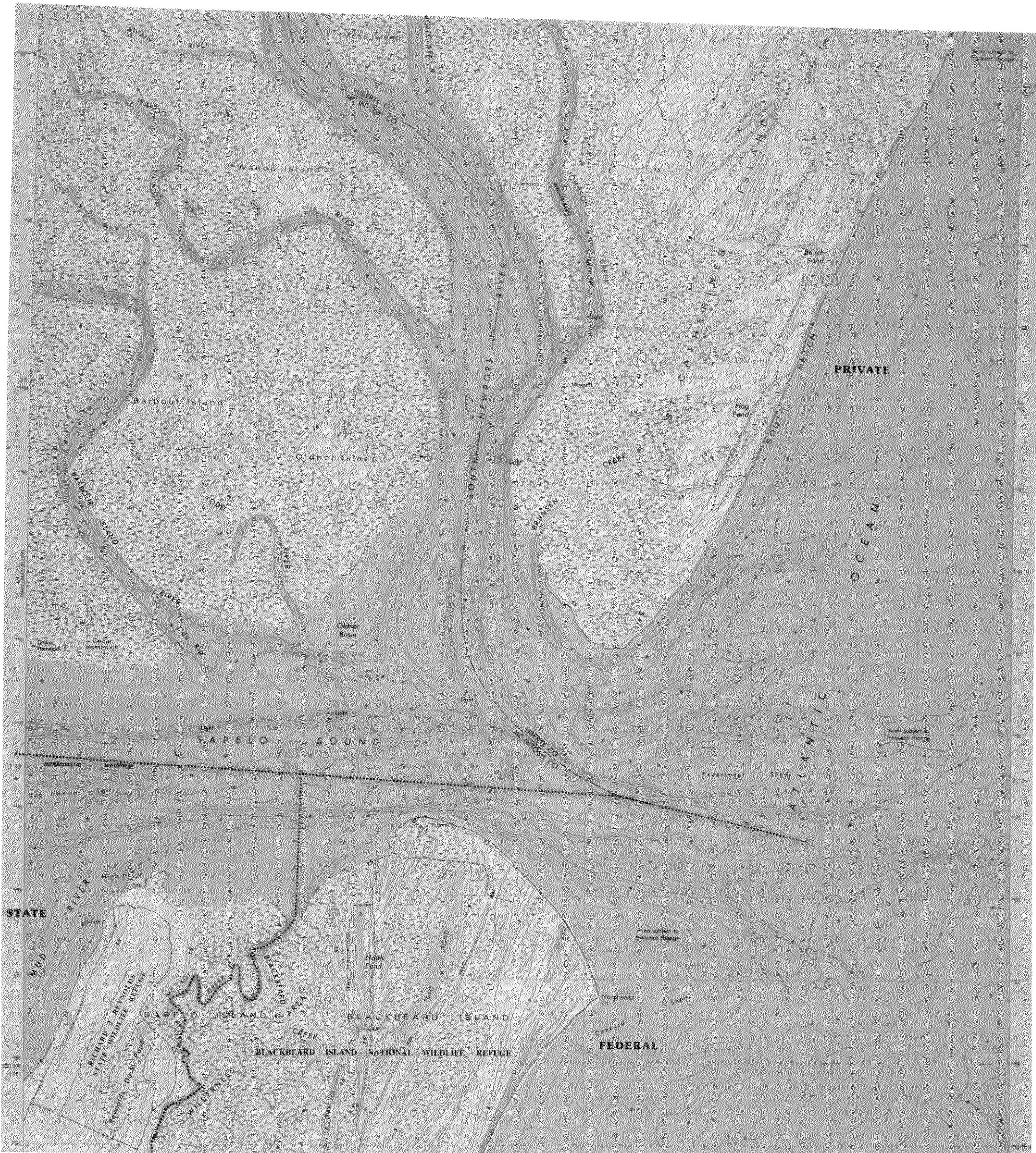
QUADRANGLE  
**SEABROOK**  
GEORGIA



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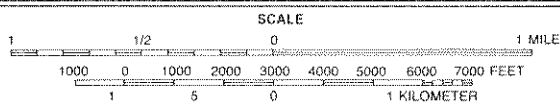
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QUADRANGLE  
**SAPVELO SOUND**  
GEORGIA



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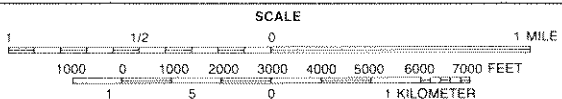
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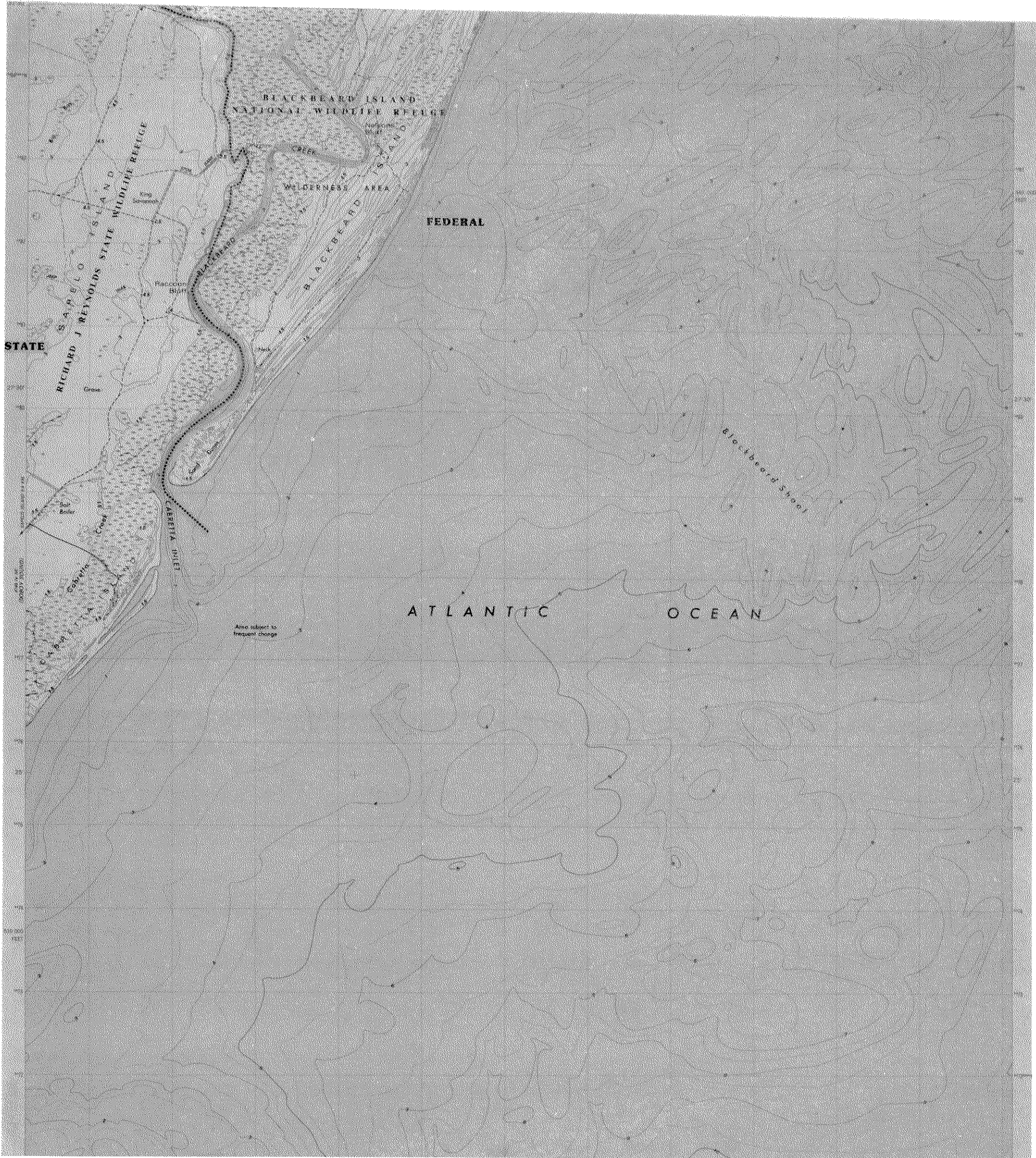
QUADRANGLE  
**SHELLMAN BLUFF**  
GEORGIA



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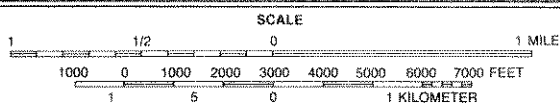
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QUADRANGLE  
**CABRETTA INLET**  
GEORGIA



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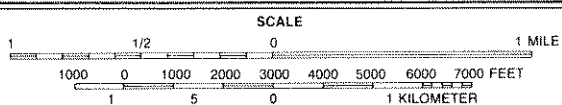
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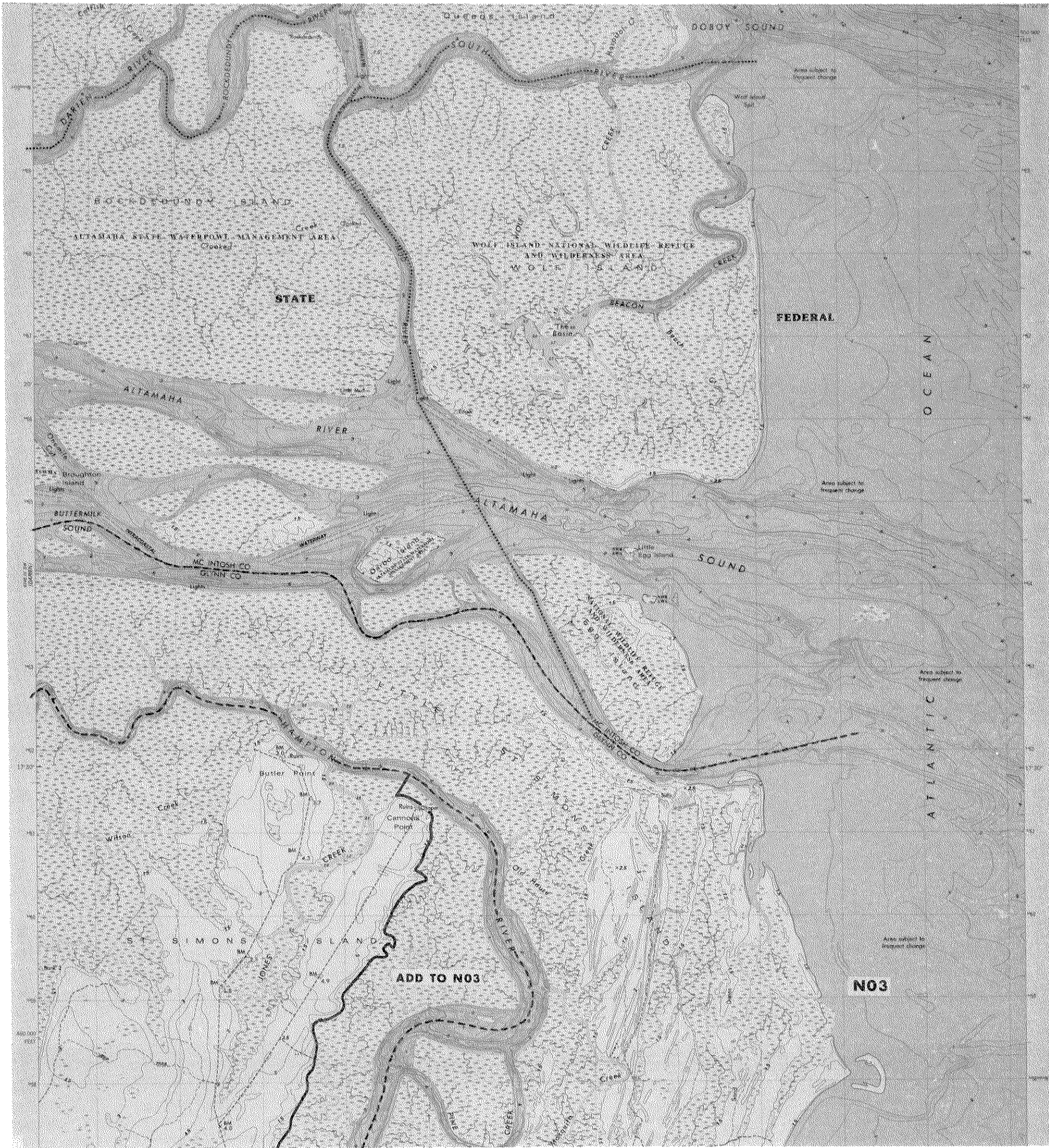
QUADRANGLE  
**DOBOY SOUND**  
GEORGIA



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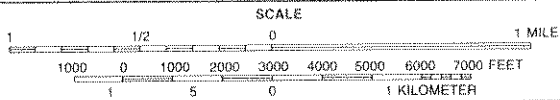
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QUADRANGLE  
**ALTAMAHA SOUND**  
GEORGIA

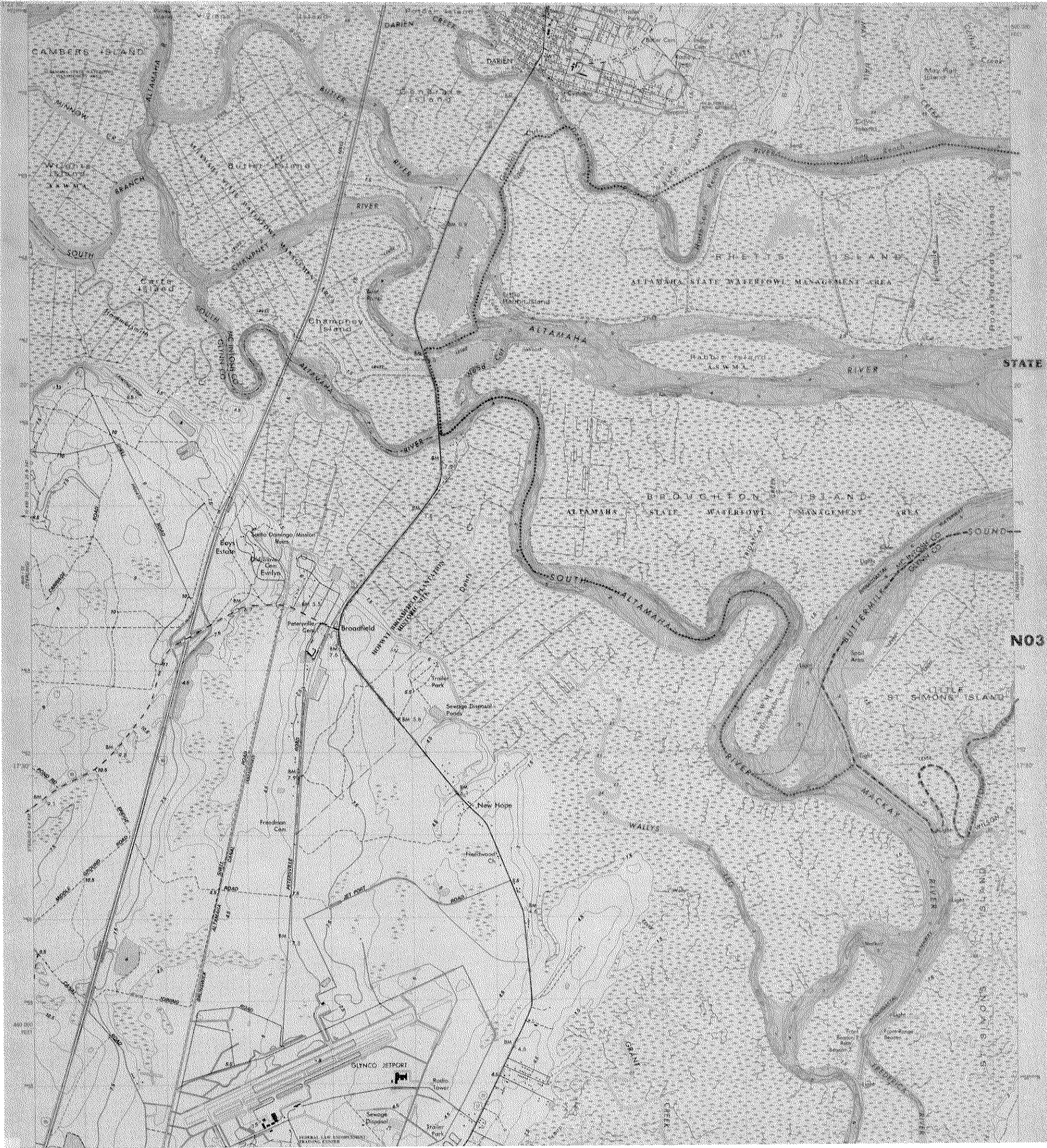


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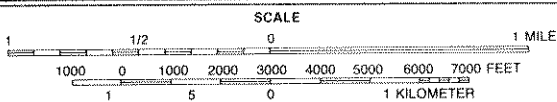
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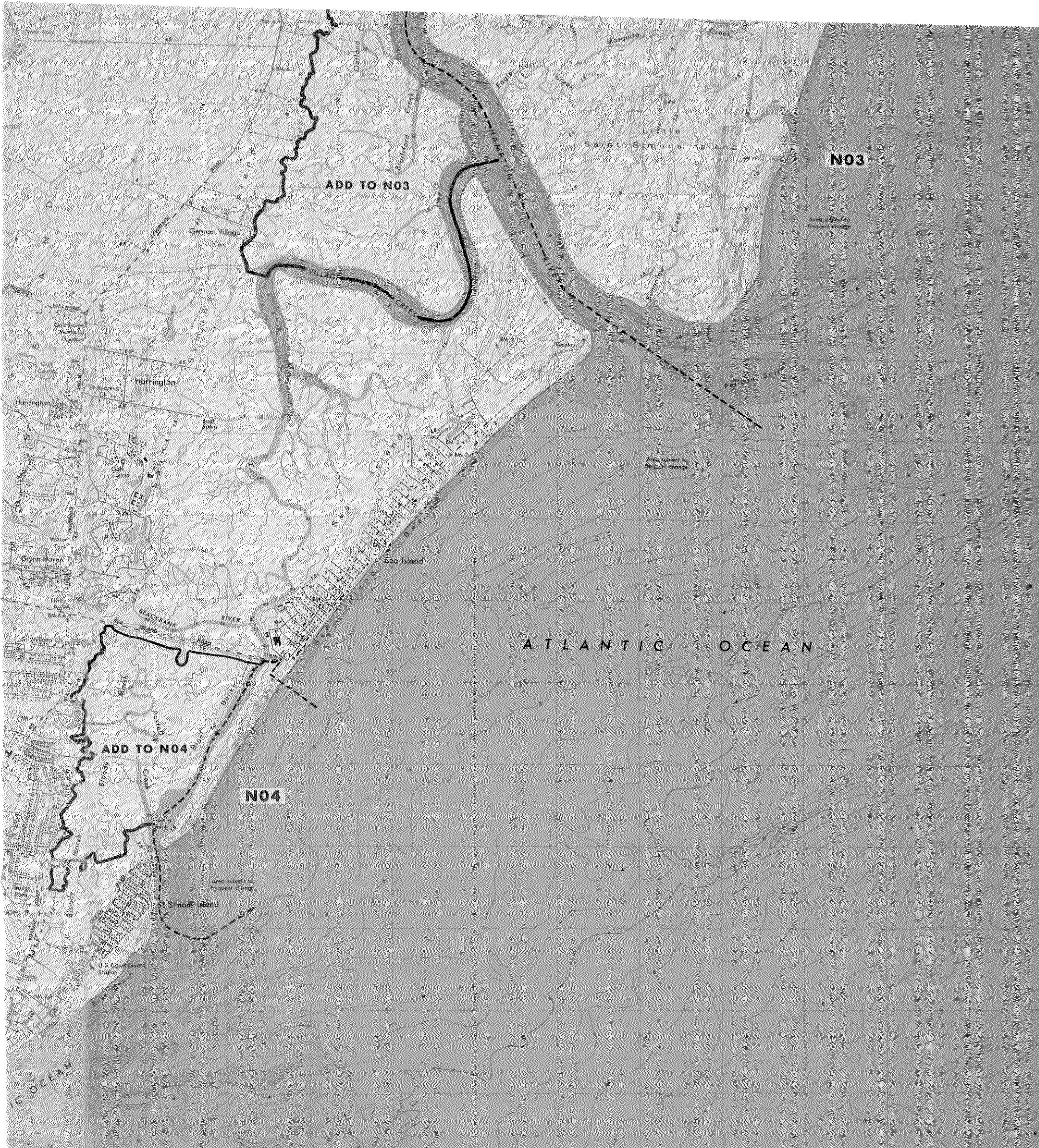
QUADRANGLE  
**DARIEN**  
GEORGIA



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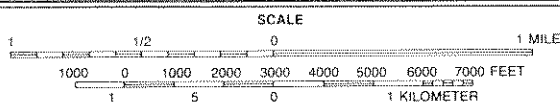
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QUADRANGLE  
**SEA ISLAND**  
GEORGIA



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N03 - LITTLE ST. SIMONS ISLAND

State Position: The State of Georgia opposes any additions to the Georgia CBRS units.

Other Comments: One letter was received requesting a boundary modification at Cannons Point to exclude all the mainland upland areas and expressing concern that inclusion in the CBRS might interfere with the permitting process. The letter is reprinted below.

Response: The DOI has carefully examined the Cannons Point area and has adjusted the

recommended boundary to exclude all the upland. The CBRA does not in any way interfere with the permitting process.

DOI Recommendation: The DOI recommends adding the associated aquatic habitat to the existing CBRS unit. The recommended additions do not include the Cannons Point uplands.

*Sea Island Company*

SEA ISLAND GEORGIA 31561 912 638 3611

June 12, 1987

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

RE: Coastal Barrier Resources Act of 1982 (P. S. 97-348); Revised  
Gentlemen:

The Draft Coastal Barrier Inventory by the Coastal Barriers Study Group dated March 23, 1987, which in part applies to real property owned by Sea Island Company, should be amended to exclude a portion of highland on the Sea Island quadrangle ("add to No. 4") and any highland on the Altamaha Sound quadrangle, including highland islands, ("Add to No. 3"). For your reference I am enclosing a photocopy of the maps with which we are concerned.

First, the highland which the Department of the Interior proposes to add to the Sea Island quadrangle is the shaded area shown upon the enclosed photocopy of the map referenced above. For several decades this narrow strip of land was the site of dormitories occupied by Sea Island Company employees. Even though the dormitories have since been removed so that no one now lives on this highland, nonetheless Sea Island Company should not be prohibited from a similar use in the future.

In addition to the use of this highland as the site for dormitories, it is currently the location of a substation owned and maintained by Georgia Power Company upon an easement granted to it by Sea Island Company. That substation is critical and necessary to the maintenance of all hotel and resort facilities on Sea Island and also to some 500 private homes. To restrict or limit Georgia Power Company in the maintenance or expansion of this substation would adversely affect Sea Island Company and the owners of these private residences.

As to the area which the Department of the Interior proposes to add as shown upon the Altamaha Sound quadrangle, we believe that it is the intention of the Department to add only marshland. However, according to the solid lines drawn by the Coastal Barriers Study Group it is not possible to determine whether or not highland owned by Sea Island Company may have been included in the proposal for additions to the Coastal Barrier Resources System. In addition, it is difficult to determine whether or not those solid lines indicate that private and public docks which might be otherwise permitted by the Department of Natural

900

Coastal Barriers Study Group  
Page 2

Resources of the State of Georgia and by the Corps of Engineers could be restricted by the addition of this area to the System.

The line in question, as to much of its course, runs along highland owned by Sea Island Company, including much of the northeasterly part of St. Simons Island, known as Cannon's Point. The entire area is populated by families, some of whom have lived adjacent to the marsh for fifty to one hundred years. Several private docks are already in place. The Cannon's Point area itself (currently being developed according to a medium to high density plan previously approved by Glynn County, Georgia and the Department of Natural Resources of the State of Georgia. The developer is a successor in title to Sea Island Company.

Adjacent highland to Cannon's Point, still owned by Sea Island Company, will also be developed in the future. It is the concern of Sea Island Company that the inclusion of highland or marshland adjacent to the solid line shown upon the Altamaha Sound quadrangle may adversely affect real property of Sea Island Company.

Even though we have not included with this letter our company records which might verify these facts, plats, copies of deeds, long range development plans, and other relevant documents are available for your inspection in our offices. As we have previously pointed out, Sea Island Company's development of real property on St. Simons Island, Georgia and on Sea Island is old in terms of development projects along the southeastern coast of the United States. It has been well established by the expenditure of tremendous sums of money as well as by the conveyance of real property to citizens of our State and others who in turn have invested their money include the areas referenced above in the Coastal Barrier Inventory, which might affect our ability as well as that of our residents to secure insurance, would be devastating to us and to them and would, in our opinion, most certainly be in violation of your own regulations.

Our office is available for further consultation. Please call upon us if additional information is required.

Sincerely,

SEA ISLAND COMPANY

*J. D. Benefield Jr.*  
J. D. Benefield, Jr.  
Vice President

JDBjr/nea  
Enclosure  
xc: Senator Sam Nunn  
Senator Wyche Fowler  
Representative Lindsey Thomas  
Governor Joe Frank Harris

N04 - SEA ISLAND

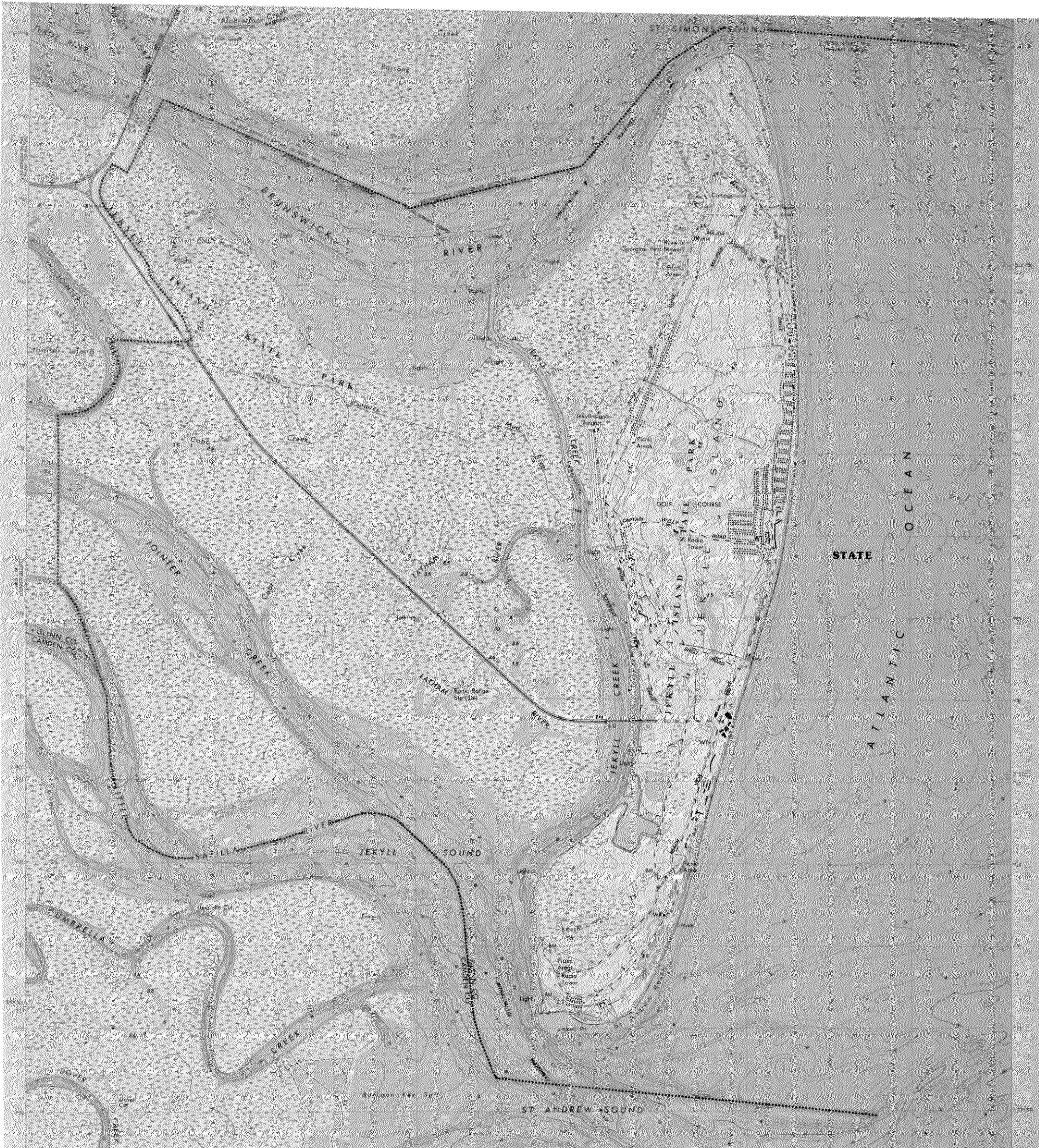
State Position: The State of Georgia opposes any additions to the Georgia CBRS units.

Other Comments: The Georgia Power Company wrote requesting deletions of several areas from N04 because of concern that continued inclusion might interfere with maintenance activities and future developments. The letter is reprinted under N03 (letter number 900).

Response: The DOI has carefully examined the areas that the Georgia Power Company is concerned about and has determined that the filled and elevated land on which the Sea

Island Road is constructed is severely modified and ineligible for inclusion in the CBRS under DOI criteria. The CBRA does not restrict Georgia Power Company activities; it only restricts Federal financial support for new development in CBRS units. Section 6 of CBRA does allow use of Federal funds for maintenance of existing utilities.

DOI Recommendation: The DOI recommends adding the associated aquatic habitat to the existing CBRS unit. The DOI's recommendation does not include the filled and elevated area surrounding the Sea Island Road.



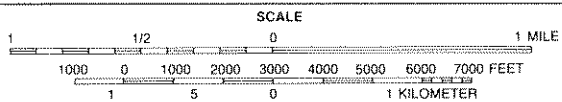
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UNITED STATES  
DEPARTMENT OF THE INTERIOR



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Washington, D.C. 20240

QUADRANGLE  
**JEKYLL ISLAND**  
GEORGIA



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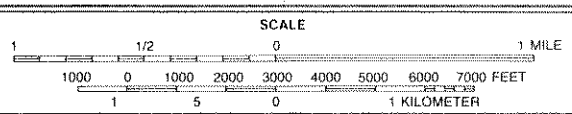
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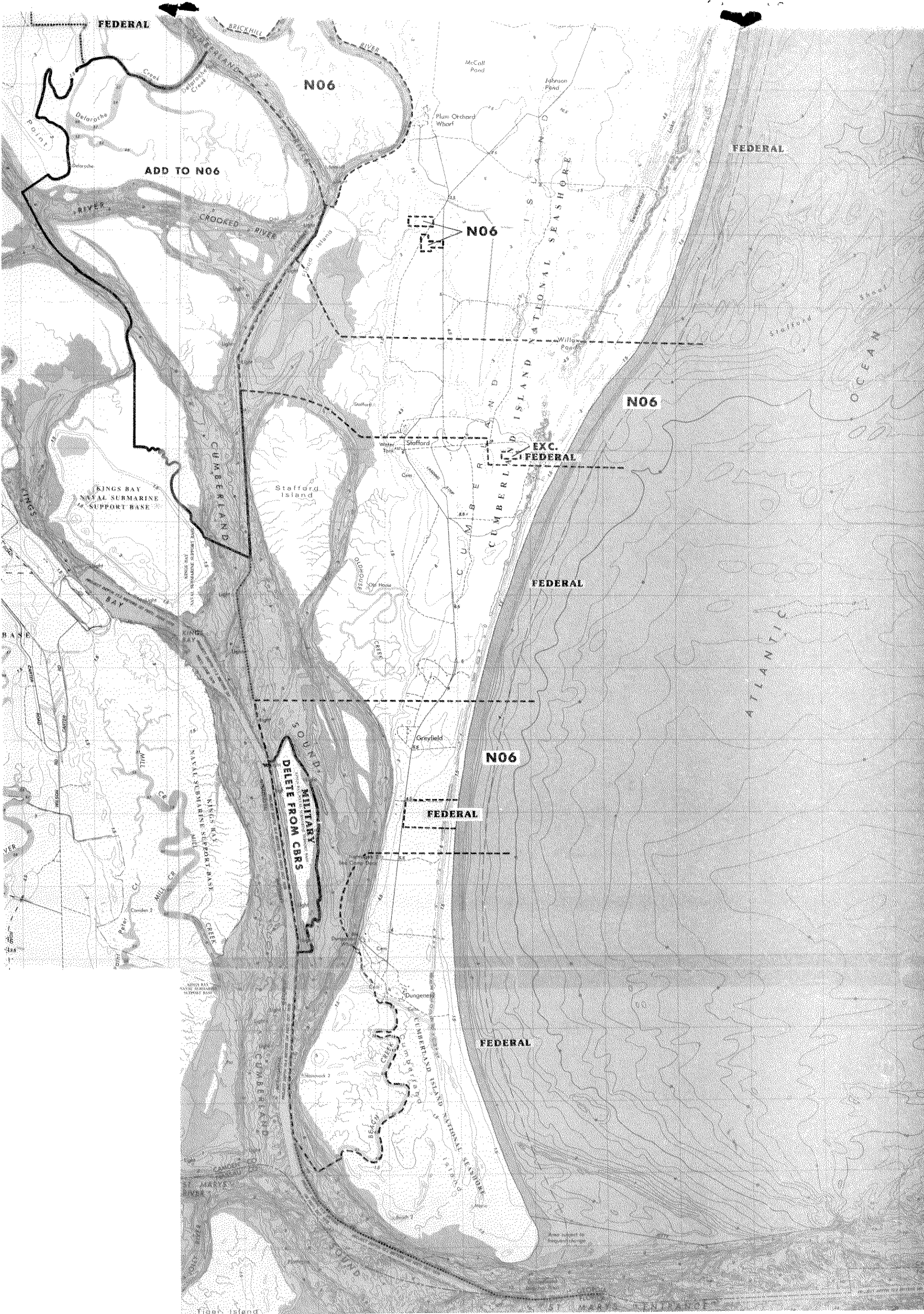
QUADRANGLE  
**CUMBERLAND ISLAND NORTH**  
GEORGIA



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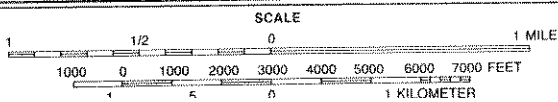
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OUADRANGLE  
**CUMBERLAND ISLAND SOUTH**  
GEORGIA



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N05 - LITTLE CUMBERLAND ISLAND

State Position: The State of Georgia opposes any additions to the Georgia CBRS units.

Other Comments: One letter supporting the addition of the inholdings to N05 was received. Another letter opposing the additions was also received, claiming some of the inholdings are developed. The letters are reprinted below.

Response: None of the inholdings in the Cumberland Island National Seashore are considered developed according to DOI criteria.

DOI Recommendation: The DOI recommends adding the undeveloped inholdings in Cumberland Island National Seashore (NPS) and the associated aquatic habitat to N05.

1156



COASTAL OFFICE 711 SANDTOWN ROAD SAVANNAH, GEORGIA 31410 912/897-6462

June 22, 1987

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

Dear Sirs:

On behalf of the Georgia Conservancy, a state-wide citizens' environmental advocacy organization, I would like to submit comments on the Final draft Report to Congress on the Coastal Barrier Resources Act of 1982 (CBRA).

The Georgia Conservancy supports the expansion of the CBRA system in Georgia as proposed in the Final Draft of March 23, 1987. However, in our view, the expansion does not go far enough. We recommend that for Georgia, you adapt the findings presented in the Coastal Barriers Study Group draft report of April, 1985, with the modifications we recommended in our letter of September 30, 1985 (copy enclosed). In summary this approach would add some 400,000 acres of coastal saltwater wetlands and some 52,000 acres of high ground coastal barriers to the CBRA system. All of Georgia's coastal barriers would be included in CBRA except for Tybee Island, St. Simons Island, the central portion of Sea Island and the developed portions of Jekyll Island and Little Cumberland Island.

The wetlands to be added are among the most productive ecosystems in the world, providing nutrients and habitat for shrimp, blue crabs, oysters, commercial and recreational fish, endangered species and a number of other important species of animals and plants. The Federal government should not be in the business of providing financial subsidy for the destruction of the valuable and vulnerable wetlands.

For the most part, the coastal barriers to be added are owned by either the federal or state government. While these barriers are not under as much development pressure as the privately-owned barriers, they are, none the less, subject to development. This is particularly true of the state-owned islands. The Final Draft makes a serious error when it concludes that government-owned coastal barriers are safe from development. Perhaps some kind of allowance should be made to allow access and use, but subsidy of developments that eventually lead to shoreline stabilization, armoring, beach renourishment and similar actions should be eliminated.

We do wish to protest the proposed deletion of Drum Point Island (part of unit N06) from the CBRA system in Georgia. The island is owned by the U. S. Navy. The Coastal Barrier Resources Act of 1982 contains an exemption for national security activities. This exemption is sufficient in our judgement to allow essential activities to occur. It would effectively block non-essential actions. We strongly recommend that Drum Point Island be retained in CBRA unit N06.

We also recommend that the Coastal Barriers Study Group reevaluate the specific boundaries for Little Cumberland Island, part of which is contained in unit N05. In our view, the undeveloped waterfront land that is owned by the Little Cumberland Island Association (and not by individual lot or homeowners) should be included in the CBRA system. The fact that the area was not included by the 1982 Act is in all likelihood an error of the mapmakers at that time. The intent of the negotiators at the time was to have the shorefront land included.

In these times of massive federal deficits and budget reductions, the prudence of a much-expanded CBRA system in Georgia makes a great deal of sense. We urge you to adopt our recommendations.

Thank you.

Sincerely,

*Hans Neuhauser*

Hans Neuhauser  
Coastal Director

egg

Enclosure



1387

LITTLE CUMBERLAND ISLAND ASSOCIATION  
P.O. BOX 2522  
ATHENS, GA 30612  
24 June 1987

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

Greetings:

Reference is made to Volume 13 (Georgia) of the Report to Congress: Coastal Barriers Resources System (Proposed Recommendations for Additions to and Deletions from the Coastal Barrier Resources System): Cumberland Island North Quadrangle.

This map, as it applies to Little Cumberland Island, is (in its present form) confusing, inconsistent, and would probably be impossible to enforce.

The Little Cumberland Island Association shares the sentiments of the authors of this report regarding their concern for the dangers and risks of overdevelopment of the coastal zone.

It should be noted that Little Cumberland Island lies within the proclamation boundary of the Cumberland Island National Seashore and therefore qualifies as a "federally protected" island. This protection is further reinforced by a formal agreement between the Department of the Interior and the Association ratified in 1974.

It was our understanding that the original alignment of the boundary between the "included" and "excluded" lands was set so as to exclude those lands on the island that were privately owned and designated as homesites, as well as administrative sites owned by the Association with structures of various kinds already in place. The line as drawn on your page 12 excludes some of these areas and includes others.

In order to correct the error and reduce the confusion, I have indicated with colored markers on a copy of your map where the line would best be drawn to meet both your needs and ours. An examination of an aerial photograph of the island will reveal a circumferential road on the northern section of the island. Although the road cuts a corner or two of some of the homesite lots, it forms a reasonable boundary to separate the included from the excluded lands. The land on the interior of the road (the portion left uncolored) is the portion of the island that we understand is to be covered by the provisions of the proposed legislation (and therefore no longer eligible for federally guaranteed flood insurance).

The green line represents the suggested boundary between the included and excluded lands. On the northern portion of the island, the green loop is the approximate location of the sand road referred to above. The portion marked in yellow, then, represents those privately owned homesites or administrative structures that should be excluded from further consideration.

I hope that these comments, together with the map, make clear what it is we are concerned about. If not, I would be willing to respond to questions or to meet with a Park Service representative to clarify the situation. My mailing address is P.O. Box 2522, Athens, GA 30612. Telephone: (404) 542-3350.

Sincerely,

  
Albert F. Ike  
Chairman

COPIES: Thomas  
Green  
Judd  
Neely  
Doyle  
Goddard

N06 - CUMBERLAND ISLAND

State Position: The State of Georgia opposes any additions to the Georgia CBRS units.

Other Comments: One letter opposing the deletion of Drum Point from the CBRS was received. It is reprinted under N05 (letter number 1156). Two other letters opposing the deletion of military land in Georgia in general were also received. They are reprinted in the General Comment Letters section (letters number 1141 and 1593).

Response: Because Section 6 of the CBRA generally exempts military activities from the CBRA restrictions, the DOI is recommending that all military lands be deleted from the CBRS (see Volume 1 for further explanation).

DOI Recommendation: The DOI recommends deleting the Navy land at Drum Point Island from the existing CBRS unit. The DOI also recommends adding the associated aquatic habitat to N06.