

REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

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



**VOLUME 17
MISSISSIPPI**

U.S. Department of the Interior



REPORT TO CONGRESS: COASTAL BARRIER RESOURCES SYSTEM

VOLUME 17

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

MISSISSIPPI

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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MISSISSIPPI

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 Mississippi 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 Mississippi and delineations of additions to and modifications of the CBRS in this State which the Department of the Interior recommends to Congress for its consideration.

BACKGROUND

The Mississippi coast is locally known as the "Riviera of the Gulf." Its many stately mansions and antebellum homes face wide, sandy (yet nourished) beaches and the Mississippi Sound. On clear days, the barrier islands of the Gulf Islands National Seashore can be seen from the mainland.

The major components of this coastal region are erosional mainland shores, marshes and swamps along rivers and bay margins, and the barrier island chain. This barrier island chain begins with Dauphin Island, to the east in Alabama, continues west along the Mississippi coast with the following sequence of barriers: Petit Bois, Horn Island, eastern and western Ship Island, and Cat Island. Except for Cat Island, these are all part of the Gulf Islands National Seashore.

Local erosion and accretion occur to some extent on all gulf and sound shores of the islands. While erosion is intense at the eastern island tips, the western ends are rapidly prograding (Waller and Malbrough 1976). In recent years, the westward spit extension has been dramatically slowed by maintenance dredging of navigation channels through some of the tidal passes.

Hurricanes and tropical storms play a major role in the temporal changes of the barrier islands. The historical patterns of change for most islands are well known (Otvos 1979);

the record shows that major changes were brought about as sudden responses to hurricane impacts. Ship Island was temporarily cut at least five times during the last 130 years. Hurricane Camille (the most intense hurricane in recent U.S. history) formed a 3-km wide cut in 1969, separating the island into its present eastern and western parts.

COASTAL RESOURCE MANAGEMENT

Mississippi Coastal Resource Management

Mississippi has a federally approved coastal zone management program. State concern about the coastal wetlands and barriers became evident in 1973 when the State's Coastal Wetlands Protection Law was passed, 1 year after the Federal Coastal Zone Management Act.

Coastal Wetlands Protection Law. This law established a State policy to favor "the preservation of the natural state of the coastal wetlands and their ecosystems and to prevent the destruction of them, except where a specific alteration of coastal wetlands would serve a higher public interest in compliance with the public purposes of the trust in which these wetlands are held." Following passage of this law, Mississippi began developing its coastal zone management program. This program was approved by the National Oceanic and Atmospheric Administration's Office of Coastal Zone Management in September, 1980.

Mississippi Coastal Program. This program established the guidelines and specific procedures to be used in carrying out the mandates of the Coastal Wetlands Protection Law. Regulated activities specifically include dredging, filling, and the erection of coastal structures. Very few of the regulations affect the non-wetland areas of coastal barriers.

The Mississippi Commission on Wildlife Conservation is ultimately responsible for administering the Coastal Wetlands Protection Law and the Coastal Program and assuring that all State agencies comply with it. Daily management of the Coastal Program is in the hands of the Bureau of Marine Resources (BMR), a subdivision of the Department of Wildlife Conservation. Although BMR administers the major portions of the program, three other agencies also monitor decisions to ensure compliance with the Coastal Program objectives. These agencies include the Bureau of Pollution Control, the Bureau of Land and Water Resources, and the Department of Archives and History.

Even before the enactment of CBRA in 1982, Mississippi's barrier islands were the focus of major environmental controversies. For example, in early 1981, the Deer Island Development Corporation (DIDC) announced its intention to develop a portion of Deer Island with residential condominiums. Jarman and Mills (1982) provided the following description of

the island and the sequence of events which followed DIDC's announcement:

The island, which at one point is only a few hundred yards from the mainland of Biloxi, provides a protective storm buffer for the mainland. In addition, it is a nursery area for species important in commercial and sport fisheries, a waterfowl and shore bird breeding ground and a haven for a wide variety of other wildlife. It has for many years served as a major recreational area for coast residents. The proposed development was to consist of 160 to 300 condominium vacation cabins on stilts, a swimming pool, tennis courts, roadways and possibly a marina. In order to provide utilities and transportation to the island from the mainland, DIDC made application to BMR, pursuant to the Coastal Wetlands Protection Law and the Coastal Program, to build a pier and a subterranean utility corridor under the wetlands. Following BMR's evaluation of the merit of the application and a public hearing on the permit, the Commission unanimously denied DIDC's permit application because the proposed activities were inconsistent with the policies and goals of the Coastal Program, would adversely affect the coastal wetlands and, ultimately, the public interest.

EXISTING CBRS UNITS

The CBRS units in Mississippi are all pineforested, sandy beach-ridge barriers. Round Island and Deer Island appear to be modified remnants of the preexisting Gulfport beach-ridge plain system. They both protect small wetland areas on their landward sides from the wave action of the open Mississippi Sound. The Belle Fontaine Point unit consists of a thin barrier spit sheltering a fairly extensive associated salt marsh system. Cat Island is a beach-ridge barrier island and the westernmost barrier of Mississippi's offshore chain.

A brief description of each CBRS unit in Mississippi 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.

R01-Round Island (Jackson). This unit is a teardrop-shaped island located directly south of Pascagoula Bay. The island appears to be a remnant of a larger island that has been eroded into its streamlined shape by currents running in a southeastern or northwestern direction. The sandy fringes of the island protect an internally vegetated region.

A naturally low elevation allows frequent flooding and submergence of this small island. Both Hurricanes Camille (1969) and Frederic (1979) inundated this island with over 10 feet of water. Because of its fragile nature, development of Round Island has not been attempted.

R01A-Belle Fontaine Point (Jackson). This unit is located east of Belle Fontaine Point, in the vicinity of Graveline Bayou. It

CBRS UNITS IN MISSISSIPPI ESTABLISHED BY CONGRESS, 1982

Unit Name	Unit ID Code	County	Shoreline Length (miles)	Total Area (acres)	Fastland Area (acres)
Round Island	R01	Jackson	1.2	943.7	50.4
Belle Fontaine Point	R01A	Jackson	1.3	681.9	48.8
Deer Island	R02	Harrison	4.5	2,015.6	241.1
Cat Island	R03	Harrison	2.6	668.2	216.6
Totals:			9.6	4,309.4	556.9

includes the coastline west of the bayou outlet for a little more than a mile. The inland boundary of the unit contains wetland communities.

This stretch of coastline includes barrier beaches which protect marshlands and tidal bays. The coastline is eroding and there are insufficient updrift sediment sources to nourish it. Low elevation makes this area extremely vulnerable to flooding. Since 1900 this unit has been inundated 15 times, including 2 occasions (Hurricanes Camille and Frederic) when it was submerged more than 10 feet.

R02-Deer Island (Harrison). This unit, which encompasses Deer Island in its entirety, stretches from the island's most eastern point at the entrance of Biloxi Bay to its most landward point, very near the City of Biloxi, where the island protects the Biloxi Bay Bottoms. The unit's eastern boundary is the Harrison-Jackson County line.

Deer Island itself comprises low, linear beach ridges that protect saltwater/brackish marsh habitat on its bay side. Its low elevations make it subject to flooding from storm surge and wave attack. Both Hurricanes Camille and Frederic totally inundated this island. Limited development of the island has been attempted.

R03-Cat Island (Harrison). Only two segments of Cat Island are part of this unit: the western sixth of the island from West Point inland 1 mile, and a portion of the central "armpit," extending from Spit Cove to the eastward-facing beach.

The crossbow shape of Cat Island suggests that it has been subject to two different dominant wave attacks opposed at right angles. The beach ridges which coalesce to form the main body of Cat Island do not exceed elevations of 6 feet. The beaches are narrow and storm surges have overwashed them, forming washover fans and terraces in the backbeach area. Although Hurricane Camille submerged the entire island, post-storm surveys indicated that nearly all of the island remained intact, losing only 0.05 percent to underwater shoals (U.S. Army Corps of Engineers 1970). There is no new sand entering the system, so the island must maintain itself by using its own sand. Sand from the north-south trending part of

the island is eroding, and incidental waves are using that material to extend South Spit.

RECOMMENDED ADDITIONS AND MODIFICATIONS

The Department of the Interior recommends that all undeveloped, unprotected coastal barriers and associated aquatic habitat identified in Mississippi be added to the Coastal Barrier Resources System. The DOI also recommends that otherwise protected, undeveloped coastal barriers be excluded from the CBRS. However, if 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 Mississippi appear in the following section. A table presenting the Department's position on each unit or proposed unit identified in Mississippi 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 Mississippi reviewed the 1987 Draft Report and supports the CBRS expansion and the exclusion of otherwise protected barriers from the CBRS. The State made no specific comments on particular existing or proposed CBRS units. The State's positions on the DOI's general recommendations are discussed in Volume 1.

The Department received 19 other comment letters concerning Mississippi. All but 3 of these supported CBRS additions in Mississippi, especially the addition of all of Cat Island to R03. Two letters objected to the exclusion of the Gulf Islands National Seashore from the CBRS. Because the Seashore is Federally protected, it is not recommended for inclusion in the CBRS under DOI criteria; however, DOI is recommending the addition of all privately owned inholdings in the Seashore by reference. 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 MISSISSIPPI

Unit ID Code ^a	Unit Name ^b	County	Congress. Dist. ^c	Shore-line Length (miles) ^d	Total Area (acres) ^e	Fast-land Area (acres) ^f	Recommendation ^g
R01	Round Island	Jackson	5	1.2	944	50	No change to existing CBRS unit
R01A	Belle Fontaine Point	Jackson	5	1.3	1,085	55	Add wetlands to existing CBRS unit
MS-02	Marsh Point	Jackson	5	2.3	1,173	69	Add to CBRS
R02	Deer Island	Harrison	5	4.5	2,016	241	No change to existing CBRS unit
R03	Cat Island	Harrison	5	2.6	668	217	No change to existing CBRS unit
MS-04	Heron Bay Point	Hancock	5	0.9	95	30	Add to CBRS
Total - CBRS as Recommended				12.8	5,981	662	
Existing CBRS				9.6	4,309	557	
Net Change in CBRS				+3.2	+1,672	+105	

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

REFERENCES

- | | |
|---|---|
| <p>Jarman, M.C., and C.L. Mills. 1982. The Mississippi Coastal Program: a review. Miss.-Ala. Sea Grant Consortium Publ. MASGP-023.</p> <p>Otvos, E.G., Jr. 1979. Barrier island evolution and history of migration, north-central gulf coast. Pages 291-319 in S.P.</p> | <p>Leatherman, ed. Barrier islands. Academic Press, New York.</p> <p>U.S. Army Corps of Engineers. 1970. Report on Hurricane Camille, 14-22 August, 1969. U.S. Army Engineer District, Mobile, Ala.</p> <p>Waller, T.H., and L.P. Malbrough. 1976. Temporal changes in the offshore islands of Mississippi. Mississippi State University, Water Resources Research Institute.</p> |
|---|---|

STATE COMMENT LETTER



Mississippi Department of Wildlife Conservation
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1159

BILL ALLAIN
Governor

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Indianos

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JOE STONE
Executive Director

Richard L. Leard
Bureau Director

June 22, 1987

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

Gentlemen:

The Mississippi Bureau of Marine Resources has reviewed the Draft Report to Congress: Coastal Barriers Resources System Executive Summary and accompanying proposed recommendations.

The staff concurs with all proposed recommendations for additions to or deletions from the CBRS as well as proposed conservation recommendations.

We appreciate the opportunity to provide comments and if you have a question or we may be of further assistance, please call.

Sincerely,

Richard L. Leard, Ph.D.
Bureau Director

ELL:JIG:jed

OTHER GENERAL COMMENT LETTERS CONCERNING MISSISSIPPI

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MISSISSIPPI CHAPTER, SIERRA CLUB
Office of the Chairman, P. O. Box 176, Ocean Springs, MS 39564

Coastal Barrier Study Group
ATTN: Mr. Frank McGilvrey
U.S. Department of the Interior
National Park Service - 498
P. O. Box 37127
Washington, D.C. 20013-7127

RE: Report to Congress: Coastal Barrier Resources
System (Volume 17: Mississippi)

Dear Mr. McGilvrey:

Please be advised that the Mississippi Chapter of the Sierra Club and its subsidiary, the Gulf Coast Group, strongly support the inclusion of the Belle Fontaine Point wetlands (R01A), Marsh Point and its wetlands (MS-02), and Heron Bay Point and its wetlands (MS-04) in the Coastal Barrier Resources System. We believe that one of the best ways to protect our coastal wetland resources is to protect the barriers that protect them. The 3.2 additional miles of shoreline and the 2,110 additional acres of protected estuarine marshes in those three proposed CBRS units represent a significant part of our coastal resources and natural heritage. (Please note on page 4 of volume 17 that Marsh Point, unit MS-02, is located completely within Jackson County.)

We are extremely pleased with the proposed inclusion of all of Cat Island (R03) in the CBRS. We were displeased with the political realities that prevented the inclusion of the entire island in CBRS initially; however, with the untimely death of the island's major owner, Nathan Boddie, in 1986, we believe that the Congressional definitions of an "undeveloped coastal barrier" must now prevail. We are somewhat concerned, however, that the published shoreline mileage cited in Volume 17 of the Report to Congress (e.g., 5 miles) does not accurately reflect the fact that that island consists of two different coastal barriers that are colliding with one another. The 4-mile long SW-NE sand spit is migrating toward the northwest and has now encountered the 5-mile long E-W segment of the old St. Bernard Delta of the Mississippi River. The E-W segment is nonmigratory at this point in its geological history. While we totally support the preservation concept of the Coastal Barrier Resources Act of 1982 and the CBRS, we recognize that the protection afforded to Cat Island does not prevent its owners from using private capital to develop their properties. Someday, we hope that that island will be protected as a part of the Gulf Islands National Seashore. Perhaps your Study Group can include that suggestion in its final draft of the Report to Congress.

We should like to register our strong opposition to the exclusion of Petit Bois, Horn, and East and West Ship islands (MS-01) from the CBRS. While we recognize that those four islands are already "otherwise protected," as parts of the Gulf Islands National Seashore, considerable numbers and sizes of private parcels (in holdings) still remain on those islands and are not now "totally" protected from adverse development. We are very concerned with the apparent posture of the Department of the Interior that



Coastal Barriers Study Group
June 19, 1987
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"What's good for private property owners is not good for the U.S. Government." We believe that that philosophy is untenable and an apparent abuse of federal power. We strongly suggest that that philosophy be reversed and/or eliminated.

The writer of this letter is a member of the Gulf Islands National Seashore Advisory Commission. His conversations with National Park Service executives in Foggy Bottom indicated that the DOI does want to "have its cake and eat it too." They do not want their development plans for national seashores and coastal wildlife refuges curtailed by anyone or anything even though those development plans involve construction on migrating coastal barriers. Because such development would be a definite waste of our tax dollars, and because we must all abide by the same laws whether they are man-made (COBRA) or natural (coastal barrier dynamics), we strongly suggest that all units of the Gulf Islands National Seashore including the newly created "Sand Island" (a Corps of Engineers' spoil island between Petit Bois and Horn islands) be included in the CBRS. In order for the Park Service to continue providing recreation facilities near Fort Massachusetts on West Ship Island, a small segment of that island can be excluded from the CBRS so as to placate the National Park Service. All other lands on those outer barrier islands must be protected in our opinion by inclusion in the CBRS. To do otherwise is deny the original reasons for the COBRA and CBRS: to preserve our natural and monetary resources!

While we understand that the apparent development on the western section of Belle Fontaine Point prevented its inclusion in the original CBRS, we now take strong exception to that decision. We hereby strongly suggest that your Study Group give serious consideration to including the 1.5- to 2.0-mile spit and low, beach-berm barrier that fronts and protects the 750+ acre Belle Fontaine marshes immediately to the north. Since the original intent of the COBRA was not to protect back marshes, we understand its exclusion in 1982; however, since the upgraded CBRS will include back marshes (e.g., Belle Fontaine Point east and Graveline Bayou marshes), all of the Belle Fontaine marsh ecosystem components should be protected.

And finally, we strongly support your decision not to change the status of Deer Island (R02) and Round Island (R01). The major owner of Deer Island, Mr. John Stocks of Tallahassee, FL, has apparently written off his attempts to develop the island as a \$3.5 million tax loss in 1985. His previous development attempts are crumbling and washing into the Mississippi Sound. Thank you for your unyielding help in protecting Deer Island and its saltmarsh ecosystem. About one-half of Round Island has been deeded to the City of Pascagoula by the Bureau of Land Management as surplus property. That municipality will now attempt to preserve the island as an urban recreation park; however, its protected status under the CBRS will have to be monitored carefully to prevent the unlawful expenditure of federal funds!

Thank you and your study group for their considerable efforts on behalf of Mississippi's coastal barrier resources. We sincerely appreciate all of your individual and collective work. We thank you for permitting us to register our concerns and suggestions regarding the draft Report to Congress on the CBRS. We look forward to assisting the DOI and the Study Group with its present and future efforts to protect Mississippi's coastal barrier and wetland resources as well as our tax dollars! If we can be of further assistance, please contact us immediately. Until then, these comments, suggestions, corrections, etc, are...

Coastal Barriers Study Group
June 19, 1987
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...Respectfully submitted,

Edwin W. Calkins, Jr., Ph.D.
Chairman, Mississippi Chapter
Conservation Chairman, Gulf Coast Group
Member, National Coastal Committee

EWC:ewc

XC: Sen. John Chafee (Mr. Christopher Ford)
Rep. Trent Lott (Ms. Martha Fortenbery)
Rep. Gerry Studds (Mr. Jeff Pike)
Mrs. Vivian Newman, Chairperson
National Coastal Committee



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

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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

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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.

Mississippi

MS-01 Gulf Islands
 "Sands Island", a small dredge-spoil island in Horn Island Pass, should be included. The island is being stabilized by pioneering dune vegetation and is now a major nesting and resting location for gulls, terns, and other migratory shorebirds.

MS-04 Heron Bay Point
 MS-04 should be expanded to include all marshes south of Three Oaks and Heron Bay bayous.

R-03 Cat Island
 We are pleased the Department has decided to recommend the inclusion of all of Cat Island within the System. Cat Island is a unique barrier island because it is a combination of two islands, one moving and one stationary, and now is in the form of a T-shaped island.

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1 Apr 87

Coastal Barrier Study Group
 Dept. Of The Interior
 National Park Service
 P.O. Box 37127
 Washington D.C. 20013-7127

Dear Sirs,

I fully concur with your proposal to increase the area of coastal shoreline and barrier islands that would be ineligible for development subsidies. Besides the obvious benefits of storm protection and ecological balance, there is also the less tangible benefit of human appreciation. Being from Ocean Springs, I have fished the Mississippi coastline and barrier islands covered by this proposal. Catching fish is only part of it; the surroundings are the rest. By discouraging development, everyone will be able to enjoy the natural beauty in these areas for many years to come.

It is a great disappointment when natural surroundings are suddenly closed to the public because of building in the name of progress. One of our favorite diving spots in Florida (East Destin jetty) was recently closed to public access due to the construction of more condominiums. A bill that limits these occurrences deserves full public support.

Diane E. West

John & Diane West
 9313 Pt. Aux Chaux Rd.
 Ocean Springs, MS 39564

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814 NORTH PRESIDENT STREET
JACKSON, MISSISSIPPI 39202
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1733

March 11, 1988

Ms. Audrey L. Dixon
Coastal Barrier Study Group
National Park Service
Post Office Box 37127
Washington, DC 20013-7127

Re: Boardwalk Properties, Inc.
Jackson County, Mississippi

Dear Ms. Dixon:

This is in response to the opportunity to comment on the Draft Supplemental Legislative Environmental Impact Statement on proposed changes to the Coastal Barrier Resources System. I represent the interests of Boardwalk Properties, Inc. of Jackson, Mississippi.

Boardwalk Properties, Inc. owns property along the Mississippi Sound in Jackson County, Mississippi. Boardwalk's property fronts on the Mississippi Sound and is located in Section 14, Township 8, Range 8 of Jackson County, Mississippi.

A telephone conversation with Ms. Tracy Harbaugh of the Office of the Assistant Secretary for Fish and Wildlife and Parks resulted in the conclusion that Boardwalk's property was not included in the properties previously designated as part of the Coastal Barrier Resources System (CBRS). Boardwalk's property is apparently also not listed as one of those covered by your proposed action to include more territory in Mississippi in the CBRS.

Boardwalk Properties, Inc. would also specifically state that if it is wrong in the above conclusion, it opposes any effort by the Department of Interior to expand its definitions under the Coastal Barrier Resources Act so as to include property such as Boardwalk Properties, Inc. has under ownership. Boardwalk Properties, Inc. takes this opportunity to object to the expansion of the definitions and coverage as set forth by your proposed action with respect to the Coastal Barrier Resources Act of 1982.

Ms. Audrey L. Dixon
March 11, 1988
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These comments are made in an abundance of caution and should be included in your record to indicate Boardwalk's objection to any expansion of definitions and coverage under the Coastal Barrier Resources Act, especially one that might include property subject to its ownership and control. Boardwalk feels that any such expansion of definition is beyond the scope of the original Act and would cause an economic loss to the owner.

If you have any questions with regard to these comments, please feel free to contact me.

Sincerely,



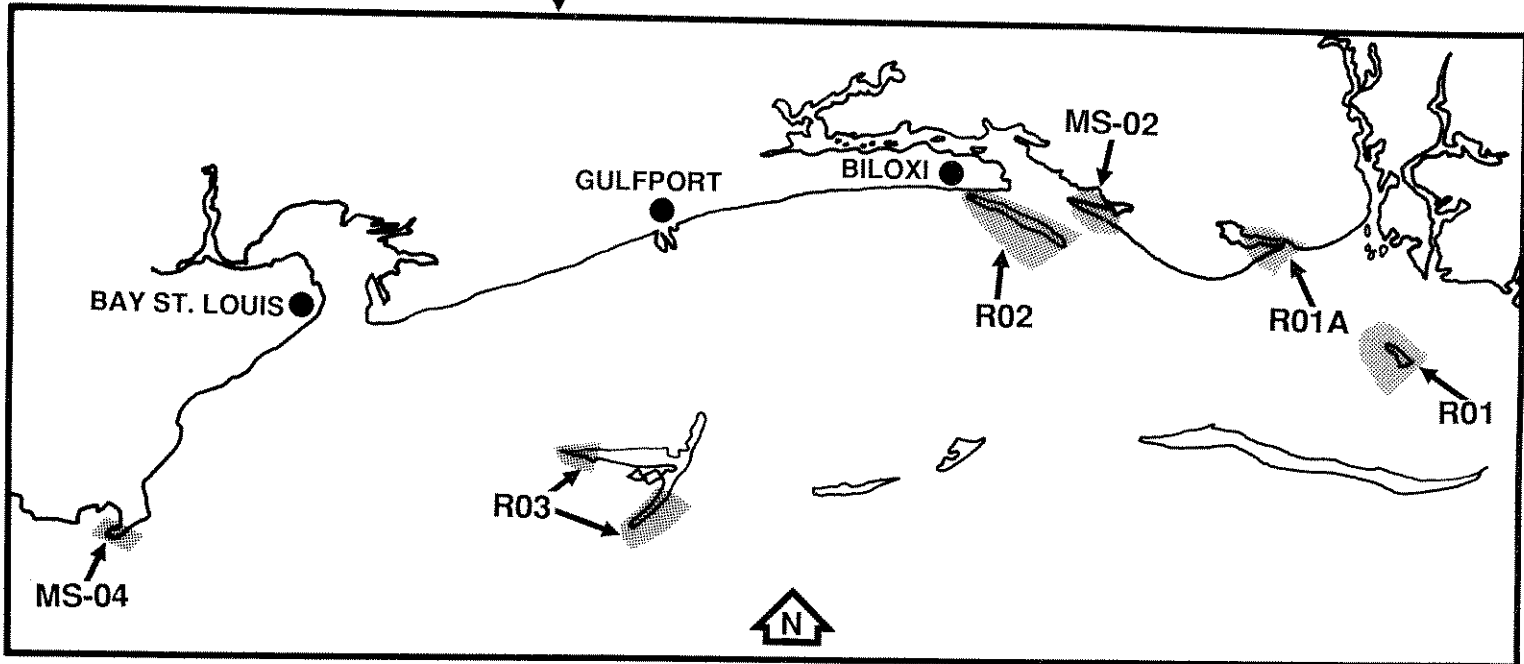
Mack Cameron

MC:hh

INDEX TO EXISTING AND PROPOSED CBRS UNITS IN MISSISSIPPI



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
R01*	Round Island	Pascagoula	12
R01A*	Belle Fontaine Point	Pascagoula	12
R02*	Deer Island	Ocean Springs	15
R03*	Cat Island	Cat Island	24
MS-02	Marsh Point	Ocean Springs	15
MS-04*	Heron Bay Point	Grand Island Pass	27

*Public comment summaries and DOI responses follow unit maps.

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

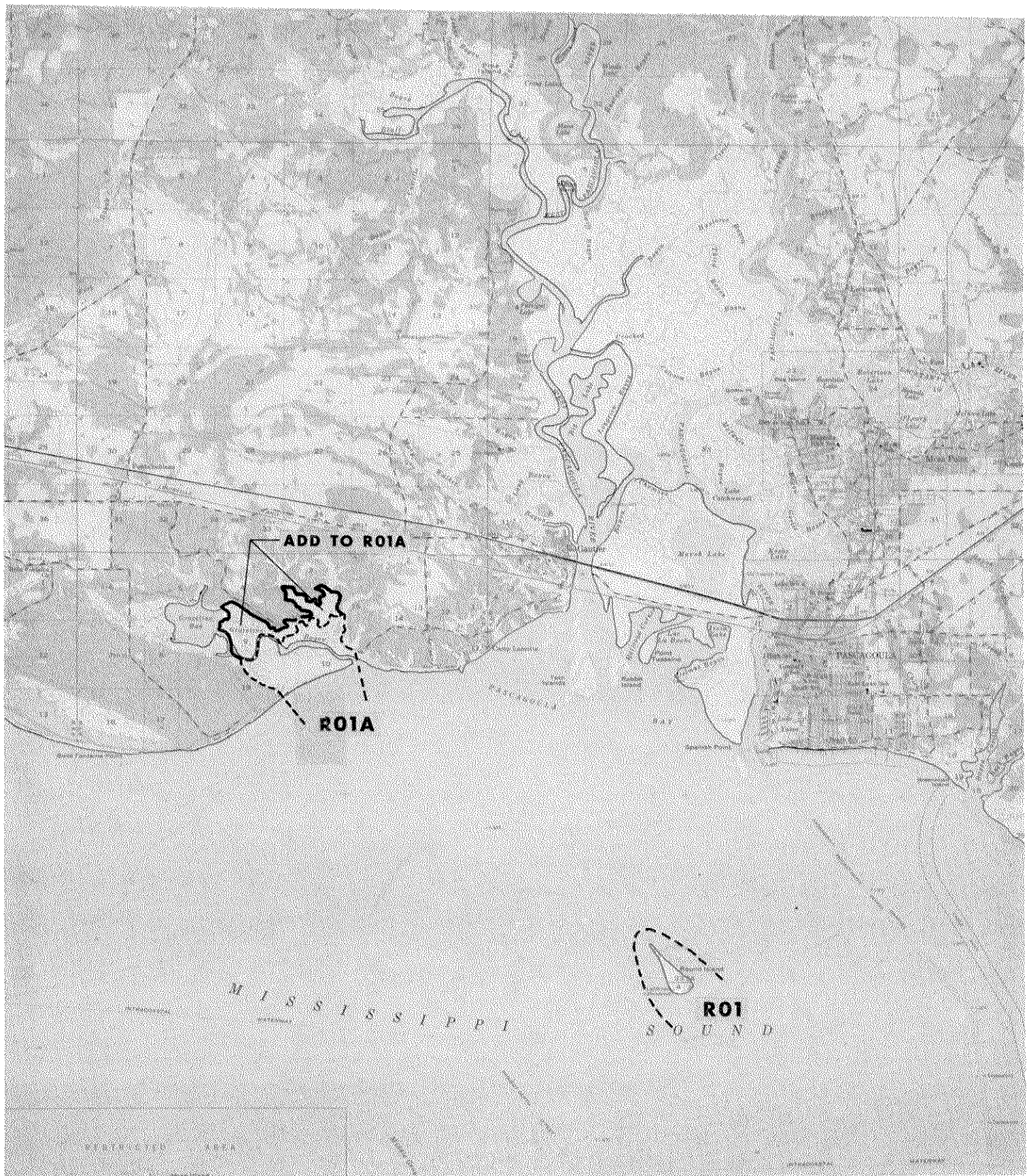
USGS Topographic Map or Map Composite	Coastal Barrier Status	Page
Petit Bois Island	Federal	19
Horn Island East	Federal	20
Horn Island West	Federal	21
Dog Keys Pass	Federal	22
Ship Island	Federal	23

*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.



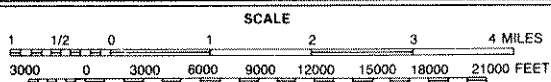
UNITED STATES
DEPARTMENT OF THE INTERIOR



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
PASCAGOULA
MISSISSIPPI



- Solid lines depict recommendations for additions to or deletions from the Coastal Barrier Resources System. (Section 10 of P.L. 97 - 348.)
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Base Map is the U.S. Geological Survey 1:62,500 scale quadrangle.

R01 - ROUND ISLAND

State Position: The State of Mississippi supports the continued existence of CBRS unit R01.

Other Comments: Two letters of support for this unit were received. One, from the City

of Pascagoula, is reprinted below. The other appears in the General Comments Letters section (letter number 979).

DOI Recommendation: The DOI recommends no change in this existing CBRS unit.

709




May 29, 1987

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

Dear Sirs:

I am writing in regard to the changes and additions to the Coastal Barriers Act. It appears your proposed additions to the area covered by the Act include property recently obtained by our City. The City applied for and obtained title to approximately 50 acres on Round Island--which is immediately (3 miles) off the shoreline from Pascagoula. This land was previously held by the Bureau of Land Management. We are in the process of implementing a shoreline stabilization project for a portion of the island, specifically trying to protect the historic lighthouse. Certainly your efforts to protect the island as well as ours will leave an imprint on coastal resources which are rapidly eroding. We appreciate any efforts on your part to achieve this goal.

Sincerely,


Dale Richardson, Mayor
City of Pascagoula

DR:ej

RO1A - BELLE FONTAINE POINT

State Position: The State of Mississippi supports the addition of associated aquatic habitat to RO1A.

Other Comments: One letter opposing additions to RO1A was received. It is reprinted below. Another letter suggested that in addition to the associated aquatic habitat delineated in the 1987 Draft Report, the Belle Fontaine and Graveline Bay marshes should be added to RO1A. It is reprinted in the General Comment Letters section (letter number 979).

Response: The associated aquatic habitat recommended for addition to RO1A fully meets DOI criteria for inclusion in the CBRS. The Belle Fontaine and Graveline Bay marshes are located behind a developed coastal barrier; therefore, they do not qualify for addition to the CBRS under DOI criteria.

DOI Recommendation: The DOI recommends adding the associated aquatic habitat to the existing CBRS unit.



CUMBEST
REALTY, INC.

576



17725 HIGHWAY 63 (Wade)
PASCAGOULA, MISSISSIPPI 39567
PHONE 601-588-6213

April 20, 1987

Mr. Frank McGilvrey
Coastal Barriers Coordinator
U.S. Fish and Wildlife Service
U.S. Department of the Interior
Washington, D.C. 20240

Dear Mr. McGilvrey:

I am in receipt of the information you mailed to me regarding the proposed recommendations of the Coastal Barrier Resources Act.

My family owns approximately 125 acres within the designated Graveline Bay and Bayou area. We are opposed to any government restriction of our property rights.

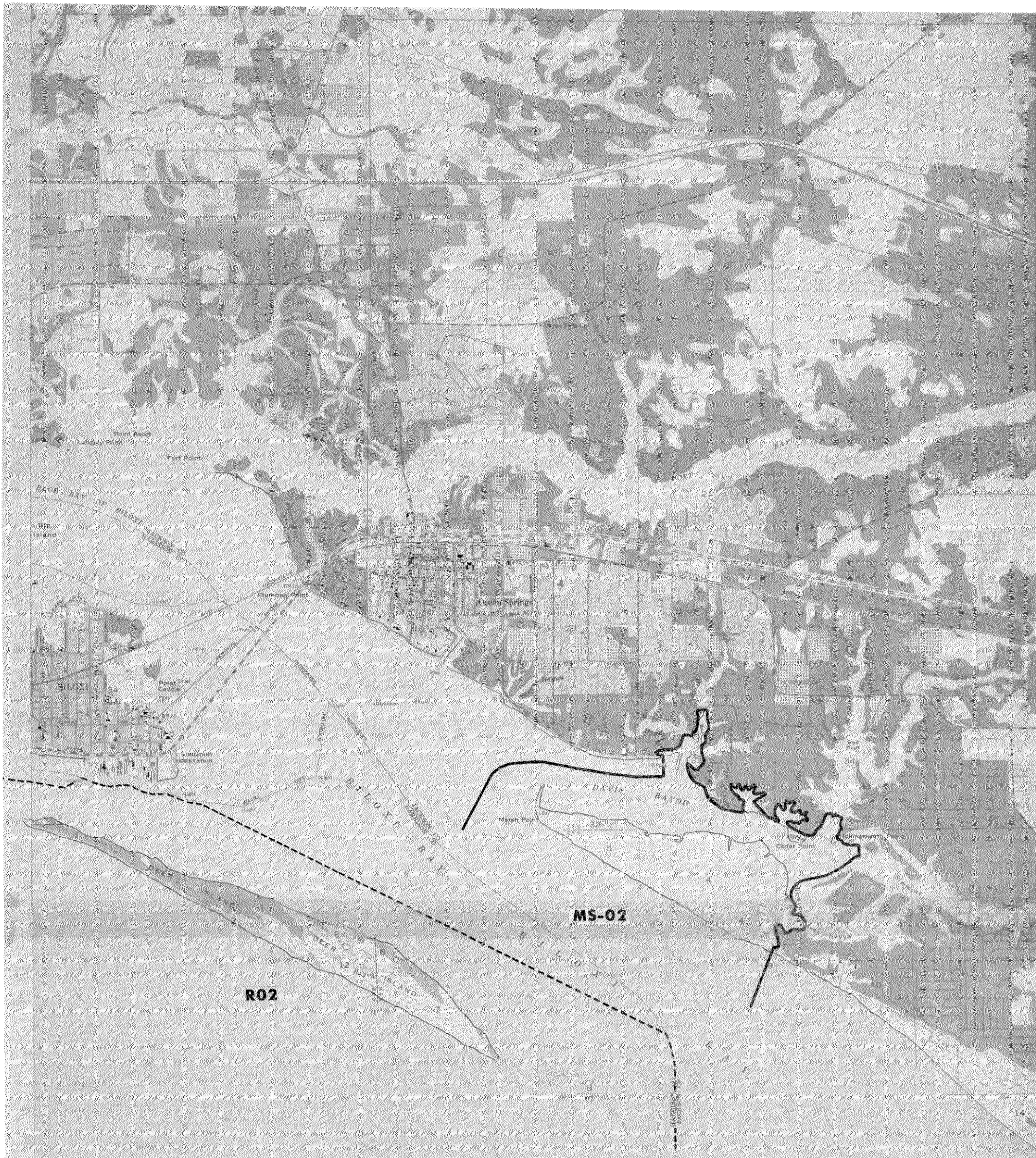
Please get back with me as soon as possible to discuss what we need to do to voice our opposition to this restrictive imposition of our property rights.

Sincerely Yours,

Mark Cumbest, ALC

CC: Congressman Trent Lott
The Coastal Barrier Study Group
David Weiss, NAR

MC:bh



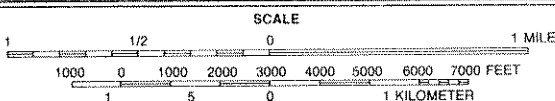
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Report to Congress on the Coastal Barrier Resources System

QUADRANGLE
OCEAN SPRINGS
MISSISSIPPI



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

R02 - DEER ISLAND

State Position: The State of Mississippi supports the continued existence of CBRS unit R02.

Other Comments: The Department received four other comment letters concerning Deer Island. Three of these, including one from the City of Biloxi, support the existence of this unit. The fourth letter requested the deletion of the unit from the CBRS claiming (1) the island is not a coastal barrier because it is located in Mississippi Sound and was formed on a Pleistocene ridge, (2) portions of the unit are developed, and (3) the portions of the unit owned by Coastal Interstate Alliance should be considered otherwise protected. This letter and the City of Biloxi's letter are reprinted below. The other two letters appear in the General Comment Letters section (letter number 979) and under R03 (letter number 10).

Response: Congress identified Deer Island as a coastal barrier when it included the island in the CBRS in 1982. Because Deer

Island is located in Mississippi Sound and does not border directly on the Gulf of Mexico, it is most correct to consider the island a secondary barrier. All of Deer Island fully meets DOI criteria as a secondary barrier. Deer Island did form on a Pleistocene ridge; however, origin of a feature is not relevant to designation as a coastal barrier.

In 1982, the DOI thoroughly reviewed the development status of Deer Island and determined that it was undeveloped according to DOI criteria. Although a few structures were present, they were well below the density required to be considered developed and infrastructure was not in place throughout the island. The DOI has no proof that the Coastal Interstate Alliance is a qualified tax-exempt conservation organization; therefore, the property cannot be considered otherwise protected.

DOI Recommendation: The DOI recommends no change in this existing CBRS unit.

585

Office of the Mayor



May 8, 1987

Mr. William P. Horn
Assistant Secretary for Fish and Wildlife
and Parks
Coastal Barriers Study Group
U.S. Department of Interior
National Park Service - 498
P. O. Box 37127
Washington, DC 20013-7127

Dear Mr. Horn:

This letter is in response to your request for comments on the proposed changes to the Coastal Barrier Resources System which is included in the Coastal Barrier Resources Act of 1982, Section 10.

Mississippi's barrier islands are the jewels that adorn the neckline of our great state. Though they may appear to be fragile spits of sand in a vast ocean of water, they are the strong and diligent guardians of highly populated Mississippi coastal area, of which the City of Biloxi is a part. These beautiful islands are vital to our defense against the eroding and destructive forces of waves, storms and hurricanes.

The City of Biloxi concurs with all of the Department of the Interior's recommendations for the Coastal Barrier Resources System in Mississippi. We agree "that all undeveloped, unprotected coastal barrier and associated aquatic habitat identified in the inventory be added to the Coastal Barrier Resources System." We also agree with your recommendation to delete MS-03 (Buccaneer) and to include all of Cat Island.

We are particularly pleased that all of Deer Island is included in the Coastal Barrier Resources System. It is most important that the entire island be maintained in its natural state, for the protection and well being of our coastline, our property and our citizens.

Mr. William P. Horn
May 8, 1987
Page 2

Thank you for the opportunity to comment on this most important issue. The protection of our barrier islands under the Coastal Barrier Resources Act of 1982 will ensure the integrity of these coastal jewels for generations to come.

Sincerely,


Gerald Blessey
Mayor

GB/maj

cc: Honorable Trent Lott
Robert E. Simmons
Terese P. Collins
Bob Landry
Reba Capers
Dr. Richard Leard

MACK CAMERON
ATTORNEY AT LAW
814 NORTH PRESIDENT STREET
JACKSON, MISSISSIPPI 39202
TELEPHONE 937-8862

1720

March 11, 1988

Ms. Audrey L. Dixon
March 11, 1988
Page 2

Ms. Audrey L. Dixon
Coastal Barrier Study Group
National Park Service
Post Office Box 37127
Washington, DC 20013-7127

Re: Deer Island
Harrison County, Mississippi

Dear Ms. Dixon:

The following are comments made to the Coastal Barrier Study Group on behalf of the Sanders family who have ownership on Deer Island, Harrison County, Mississippi. These comments are made on the Draft Supplemental Legislative Environmental Impact Statement and are made to assist the Secretary of Interior in making his final decision with respect to the placement of the Sanders ownership on Deer Island within the provisions of the Coastal Barrier Resources Act of 1982.

At the time of the passage of the Act and at the time of the public comment period between March 4, 1985 and September 3, 1985 the portion of Deer Island presently owned by the Sanders family was the subject of a claim of conditional ownership by Mr. John Stocks since Mr. Stocks had made a down payment to the Sanders family and issued a deed of trust. Unfortunately Mr. Stocks did not provide any comment to the appropriate authorities on Deer Island during the comment period.

As a result of Mr. Stocks' failure to comply with the terms of the deed of trust, ownership was voluntarily returned to the Sanders family on August 19, 1986. The family makes this presentation in the hopes that their opposition to the inclusion of their remaining property in the Coastal Barrier Resources System (CBRS) will be part of the permanent record with respect to Deer Island and will justify a decision by the Secretary of the Department of Interior to withdraw the present Sanders family ownership from the CBRS. This activity is consistent with the Department of Interior representation that

adjustments of boundaries of units presently in the CBRS will be made in order to remove those areas that do not qualify as coastal barriers under the Department of Interior criteria and should not have been included. In addition, the Department represented that areas that were developed at the time the Coastal Barrier Resources Act became law in 1982 would also be removed from CBRS.

It is interesting to note that the Department previously received 21 other comments concerning Mississippi with all being related to keeping Deer Island in the CBRS. It is my understanding that a petition with 67 signatures opposing the deletion of Deer Island from the CBRS was also received. It is also my understanding that none of the signatures on the petition or the 21 other comments are apparently those of individuals who have ownership on Deer Island and certainly did not include the members of the Sanders family, who are the largest individual owners on the island. Thus there is a situation where recommendations were made by members of the public who have no ownership on the island to the Department of Interior that actions be taken which led to limitations on the utilization of the island with such limitations being detrimental to those who own portions of the island. It is requested that the Department reconsider its decision to recommend that the present Sanders family ownership on Deer Island remain in the CBRS for the following reasons.

Deer Island is not a barrier island in the traditional sense. As is discussed by Dr. Ervin G. Otvos in Attachment "A" and George Cole in Attachment "B," Deer Island is not a true barrier island as is Petit Bois Island, Horn Island, Ship Island or Cat Island. All of those islands form the outer boundary of the Mississippi Sound and front on the Gulf of Mexico. Those islands are the primary barrier islands and are not composed of consolidated materials as is Deer Island. The barrier island system along the Mississippi Gulf Coast creates inland waters which are segregated from the Gulf of Mexico as was noted in the recent U.S. Supreme Court case, *U.S. v. Louisiana*, 407 US 93 (1985), locally identified as the Mississippi Sound Case.

An undeveloped coastal barrier is defined by the Coastal Barrier Resources Act as including a barrier island that is a depositional geologic feature which consists of unconsolidated sedimentary materials. As is indicated by Dr. Otvos' paper, the origins of Deer Island during the Late Pleistocene era indicate that river depositions formed the core of today's island which was located during the Pleistocene era on dry ground since the sea shore was several tens of miles gulward,

Ms. Audrey L. Dixon
March 11, 1988
Page 3

and the whole area was part of the mainland. During the Holocene period, melting of ice sheets gradually raised sea level to the present mainland. It was during this time that the high ground around Deer Island became surrounded by sea waters. For a brief time the Gulf extended to the present mainland but a barrier island chain was formed and separated the newly formed Mississippi Sound from the Gulf of Mexico. Deer Island has long since ceased to be a barrier island because it now sits in a bay lagoon system. The Court in the *U.S. v. Louisiana* case recently decided that the Mississippi Sound is in fact an historic bay. Deer Island lies within this historic bay.

It must be noted that title to the eastern half of the island is presently in a conservation group, the Coastal Interstate Alliance. The Alliance is a duly qualified tax-exempt conservation and preservation entity which has title to those marsh lands and aquatic habitats that the Coastal Barrier Resources Act was directed toward protecting. There will be no construction in this area because the area must be preserved pursuant to the preservation principles set forth for the creation of the Coastal Interstate Alliance. The individuals who made the contributions of the land to the Alliance have already received the significant tax benefits from the donation of the property to the tax-exempt conservation and preservation group and the Internal Revenue Service has certified the donation. Thus the property donated must be preserved as a conservation unit.

The remainder of Deer Island is mostly owned by the Sanders family with a few other individuals holding limited ownership. This portion of the island consists of high ground with an abundance of pine trees, live oak trees, magnolia trees, along with approximately five percent (5%) of the acreage containing marsh lands or wetlands. These limited marsh lands are located on the southeast portion of the Sanders ownership as it presently exists today and is adjacent to the Coastal Interstate Alliance ownership. The vast majority of the Sanders family ownership is high and dry ground the same as or similar to property in the City of Biloxi, a mere quarter of a mile away across a small channel.

The Sanders family asserts that it is blatantly unfair to discriminate against owners of the high ground on Deer Island when federal flood insurance is available on property the same level of elevation across the channel. In many instances the same level of elevation in the City of Biloxi across from Deer Island is entitled to flood insurance while the Sanders family portion of Deer Island at a similar elevation is denied access to flood insurance because of its inclu-

Ms. Audrey L. Dixon
March 11, 1988
Page 4

sion in the CBRS. Such action is certainly unwarranted since Deer Island, and the present portion of Sanders family ownership in particular, fails to meet the criteria of the Coastal Barrier Resources Act of 1982 by being an island composed of consolidated sedimentary material. The action which included the present Sanders family ownership in the CBRS unnecessarily limits the options of the owner to utilize the property and causes a severe economic loss to the owner of the high ground on Deer Island. Such loss by regulation, if allowed to stand, would constitute a taking without due process of law and as such would be an unconstitutional act. The Sanders family respectfully requests that their present ownership on Deer Island, as identified on the map attached as Attachment "C," be withdrawn from the CBRS and that it be able to enjoy the same benefits of the availability of federal flood insurance as those individual property owners a mere quarter of a mile away in Biloxi presently enjoy.

In addition, at the present time there is no access to the preservation area controlled by the Coastal Interstate Alliance. Allowing the Sanders family ownership to be removed from the CBRS and thereby qualifying for flood insurance would enable the Sanders family to make arrangements for access to their high ground area which is adjacent to the preservation and conservation area. Such arrangements could potentially allow, depending upon usage, for the visitation by the public and could hopefully be part of an attraction for the public to be able to visit so that they may enjoy and appreciate the useful purposes such marshlands provide for the sea-based economy and industry at Biloxi and along the Mississippi Gulf Coast. Indeed, immediately to the north of the island, just north of the Point Cadet Marina in Biloxi, is located the Gulf Coast Marine Education Center. The City of Biloxi hopes to institute a shuttle boat service to Deer Island from this location once all questions of usage and ownership have been dealt with.

The Sanders family would also like to take this opportunity to make the Coastal Barrier Study Group aware of the following points. Though the Sanders family was not involved in the development of the island at the time, Mr. John Stocks was about the business of operating his development on Deer Island at the time of the passage of the Coastal Barrier Resources Act of 1982. Inhabited housing units were in place and a full infrastructure of utilities was being provided to the island, including street lights, a fire protection system, and a water system. The existence of these units was certainly easy to determine at the time of the passage of the Act, but

Ms. Audrey L. Dixon
March 11, 1988
Page 5

was probably not known by those individuals who made the determination to include Deer Island in the CBRS. Yet Deer Island very clearly qualifies for an exclusion under the Act's definitions.

Further, it should be noted that large portions of Cat Island in Mississippi were originally excluded from inclusion in the CBRS with portions being included. Yet with respect to Deer Island, all of that location was included. We feel that the application of the criteria of the Act to Cat Island was a more fair, legal and equitable application of the terms of the Act than the application that was made to Deer Island. There is simply no reason for the differing treatment of Deer Island given the present exclusion of portions of Cat Island. We feel that all of Deer Island should have been excluded based on the criteria that should have been utilized at that time.

As is obvious from the above information, at the very least the Sanders family ownership on Deer Island should be one of those areas that is recommended for exclusion from CBRS by the Secretary to the United States Congress. The inclusion of that area of Deer Island, which was in the possession of John Stocks at the time of the Act but is now back in the Sanders family ownership, may have contributed to the failure of Mr. Stocks' development on Deer Island which resulted in a tremendous economic loss to the Sanders family.

The Sanders family wishes only to have an equal opportunity to do the same things with their ownership that those on the beach at Biloxi, a mere quarter of a mile away, and those on Cat Island can do at the present time due to their access to federal insurance programs. Without such equal treatment the Sanders family will be discriminated against and again will suffer a tremendous economic loss and decrease in value of the island so as to severely limit the family's utilization of the property.

In conclusion, we submit that Deer Island did not qualify for inclusion in the CBRS in the first instance due to its composition and location and should not have been included. It also did not qualify since there was an existing development in place at the time of the application of the provision of the Act. With title to the eastern portion of the island, which contains approximately ninety-five percent (95%) of the wetlands and aquatic habitat area, already in a conservation and preservation group, the purpose of the Act is served. The remaining high ground should be allowed the same federal

Ms. Audrey L. Dixon
March 11, 1988
Page 6

program coverage as those areas of similar elevation on the mainland approximately a quarter of a mile away and on Cat Island. At the least, the Sanders family ownership should be excluded from the CBRS and the boundaries of the CBRS unit on Deer Island adjusted accordingly. In addition, definitions under the Act should not be broadened in their application so as to include the Sanders family ownership on Deer Island.

If you have any questions, please contact me.

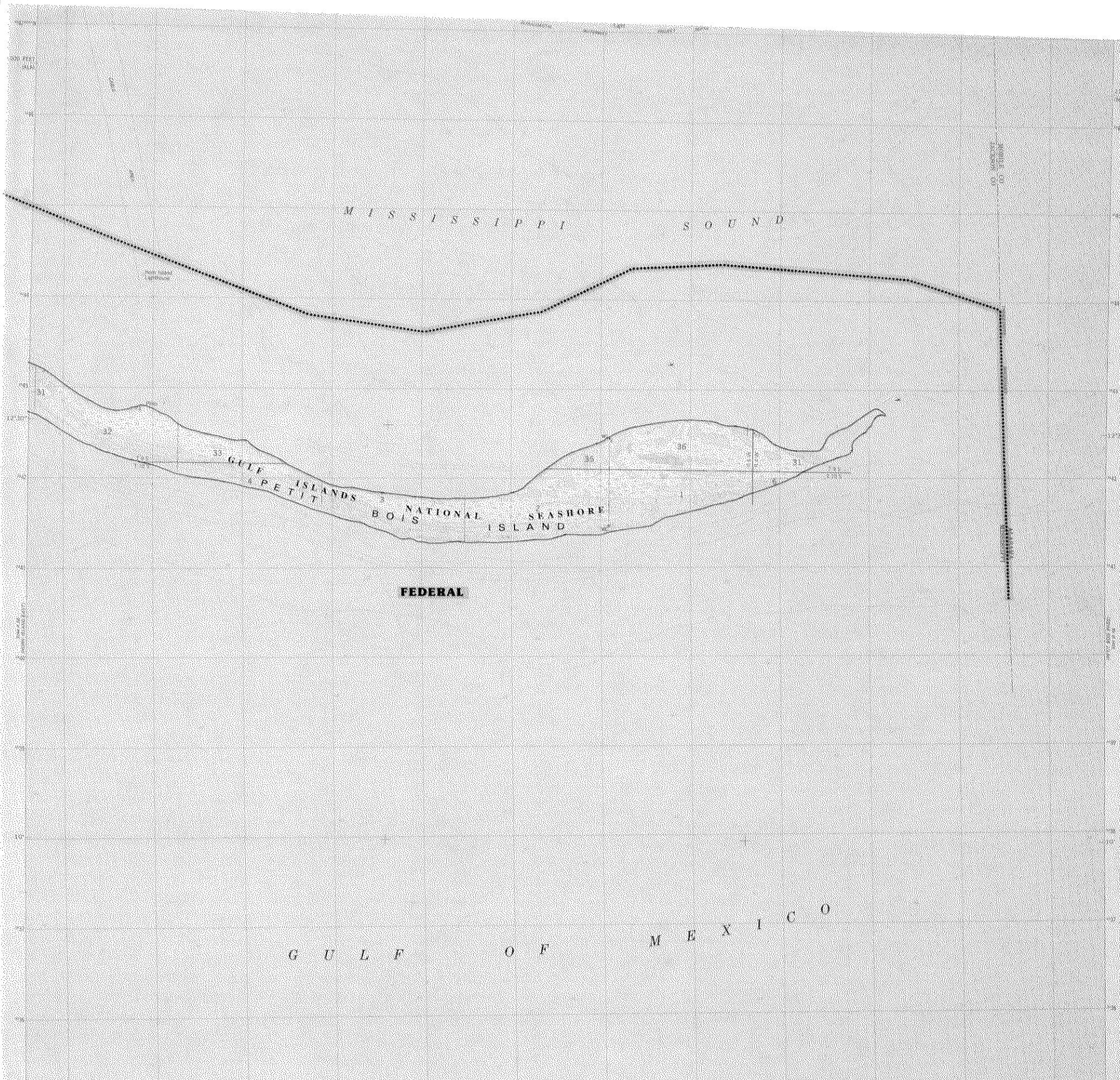
Sincerely,



Mack Cameron

MC:hh

Attachments: "A", "B" and "C"



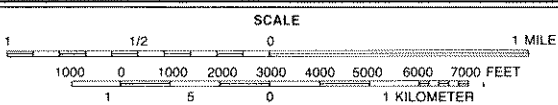
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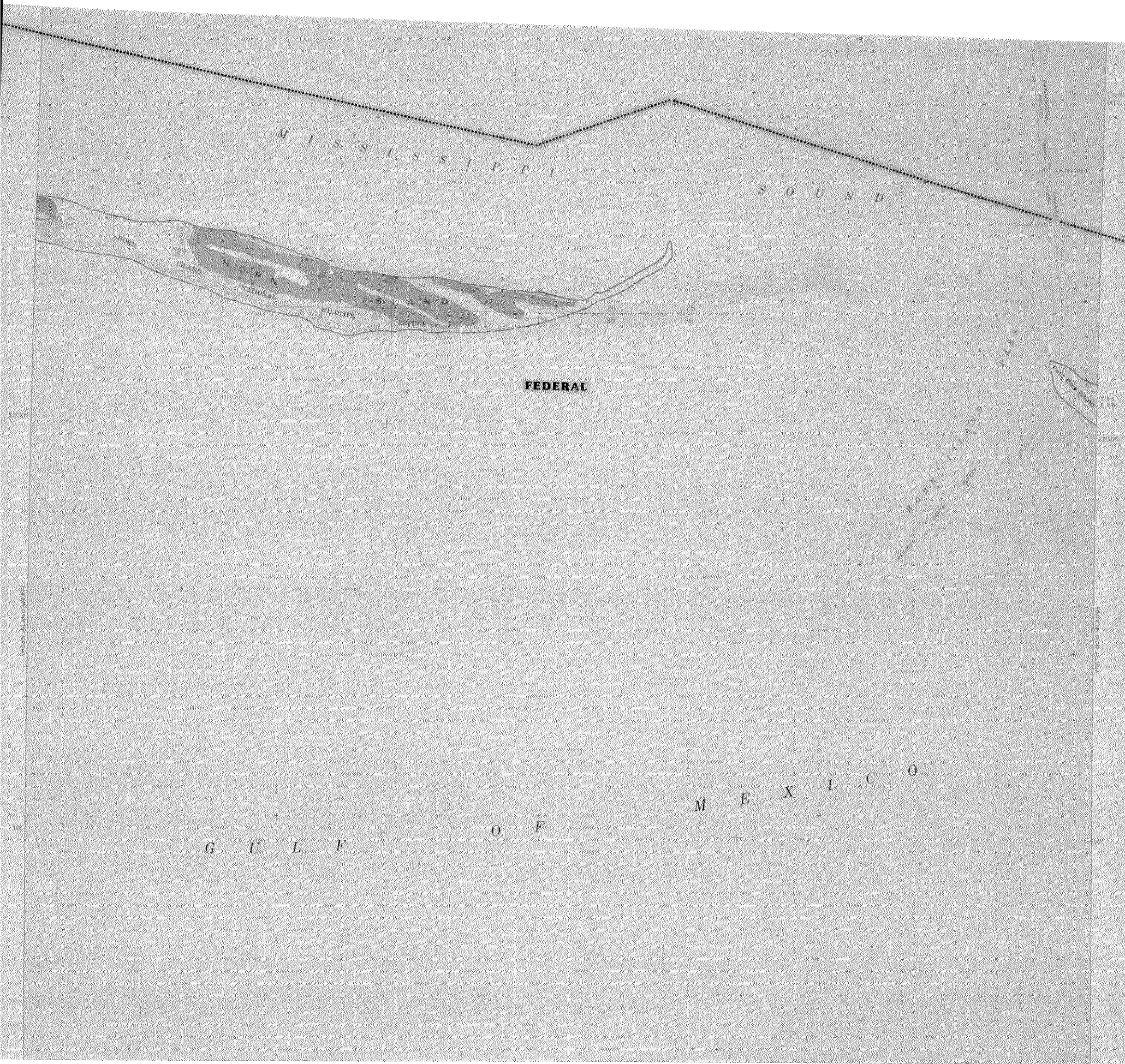
QUADRANGLE
PETIT BOIS ISLAND
MISSISSIPPI



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



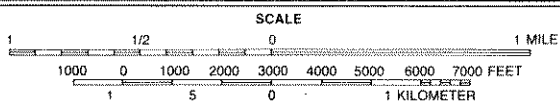
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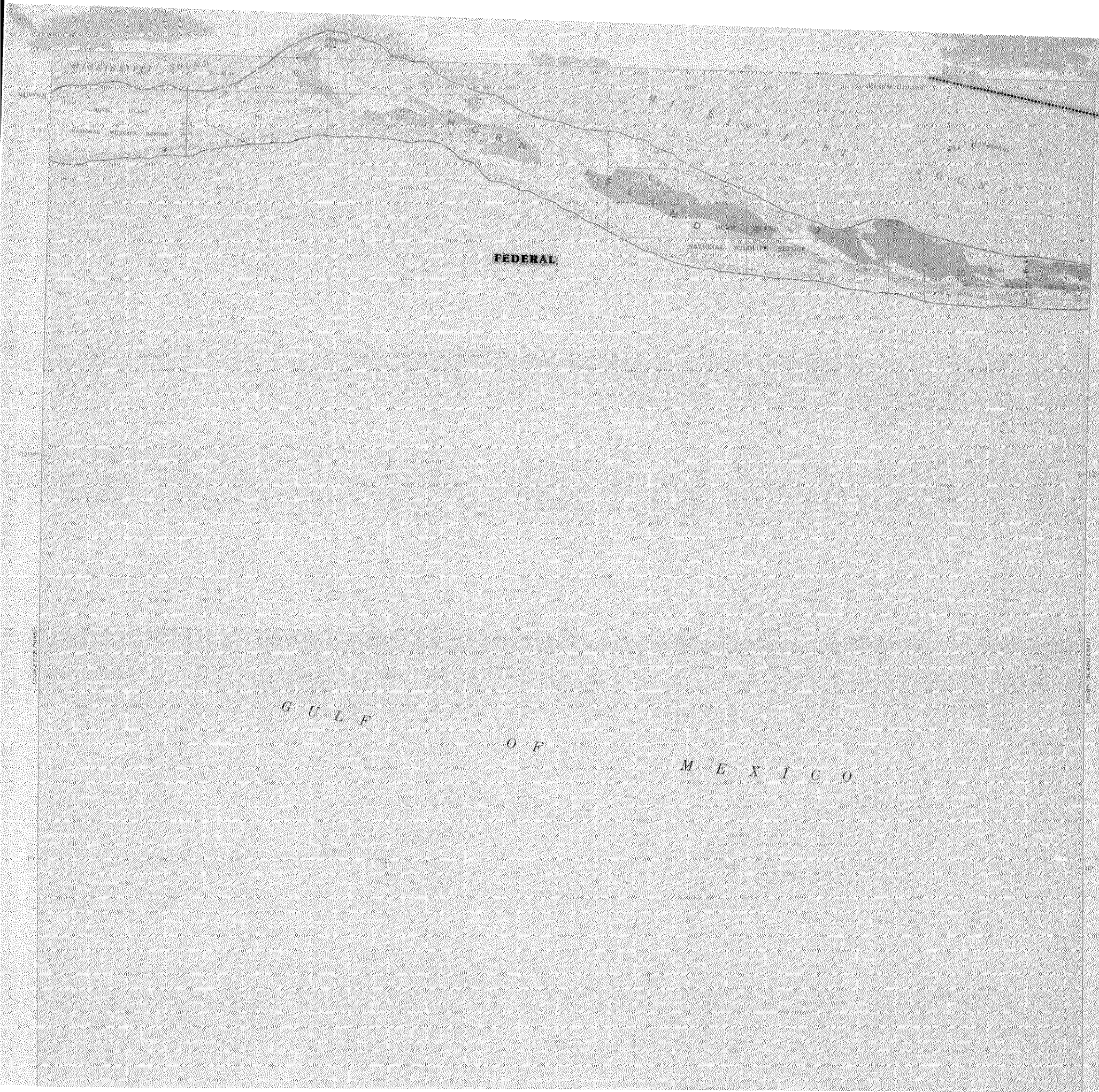
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HORN ISLAND EAST
MISSISSIPPI



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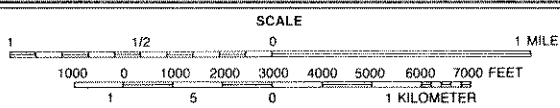
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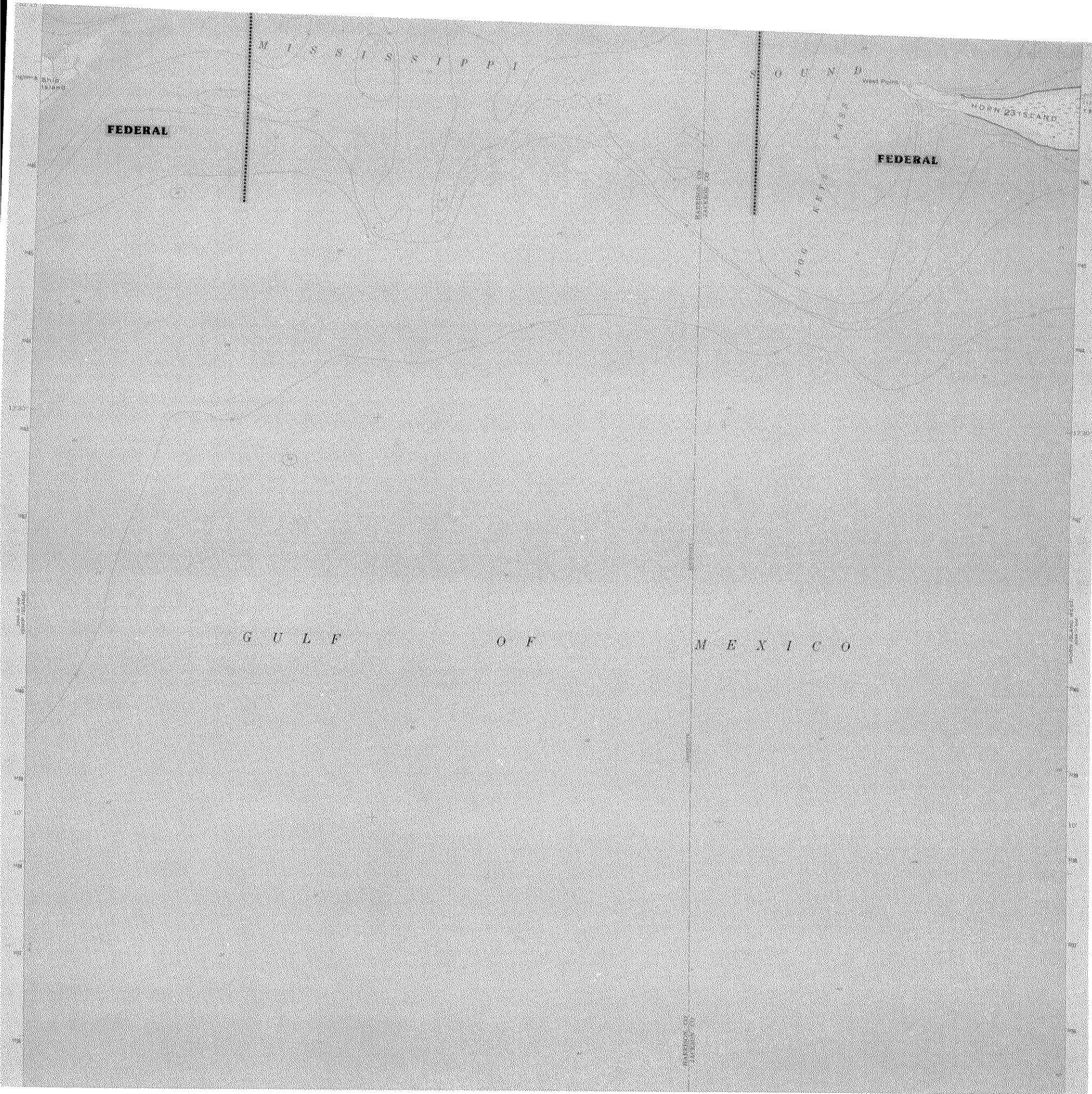
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HORN ISLAND WEST
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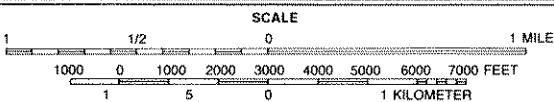
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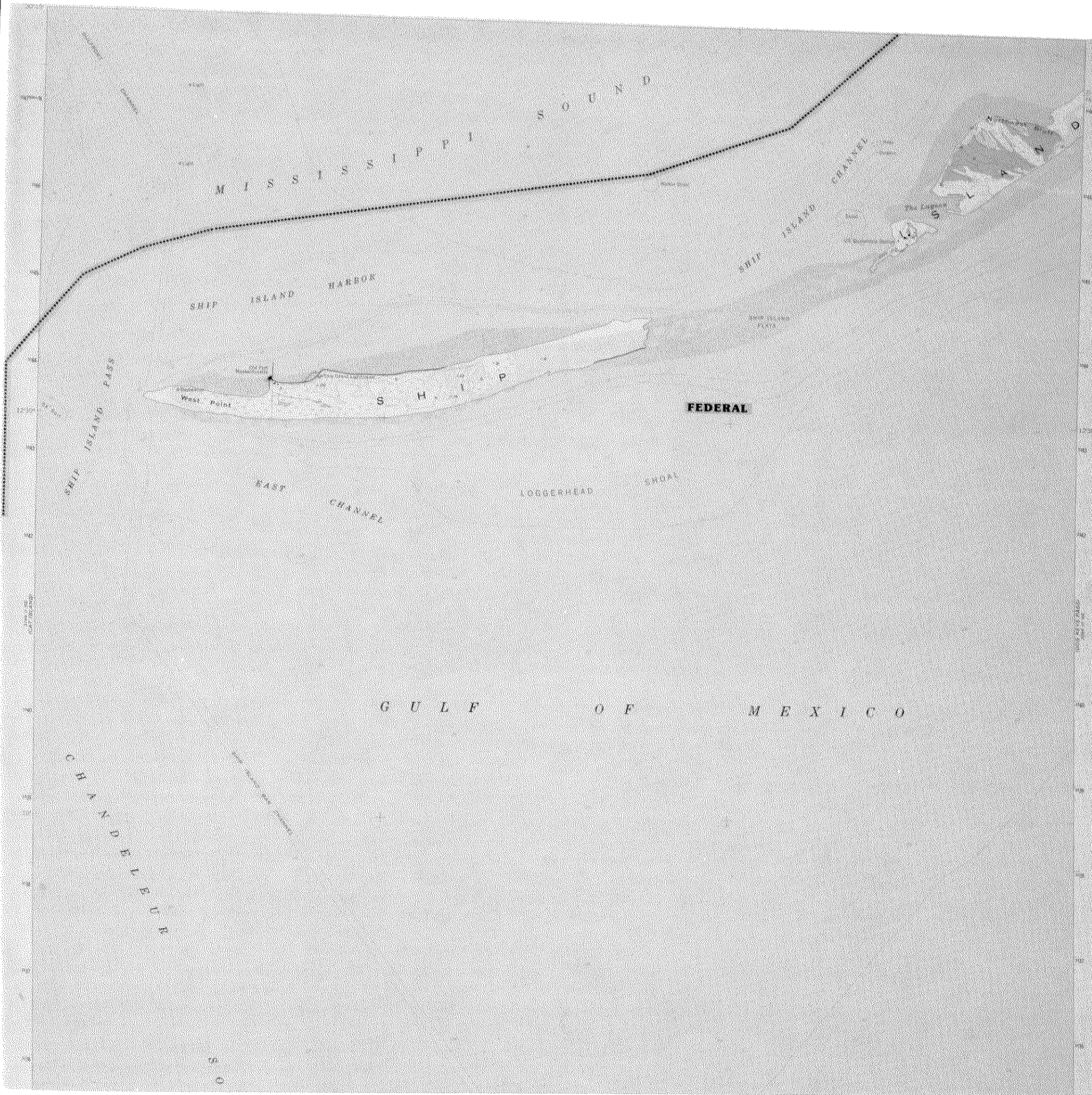
QUADRANGLE
DOG KEYS PASS
MISSISSIPPI



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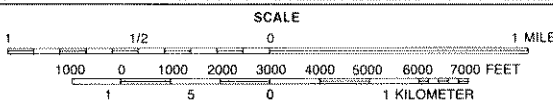
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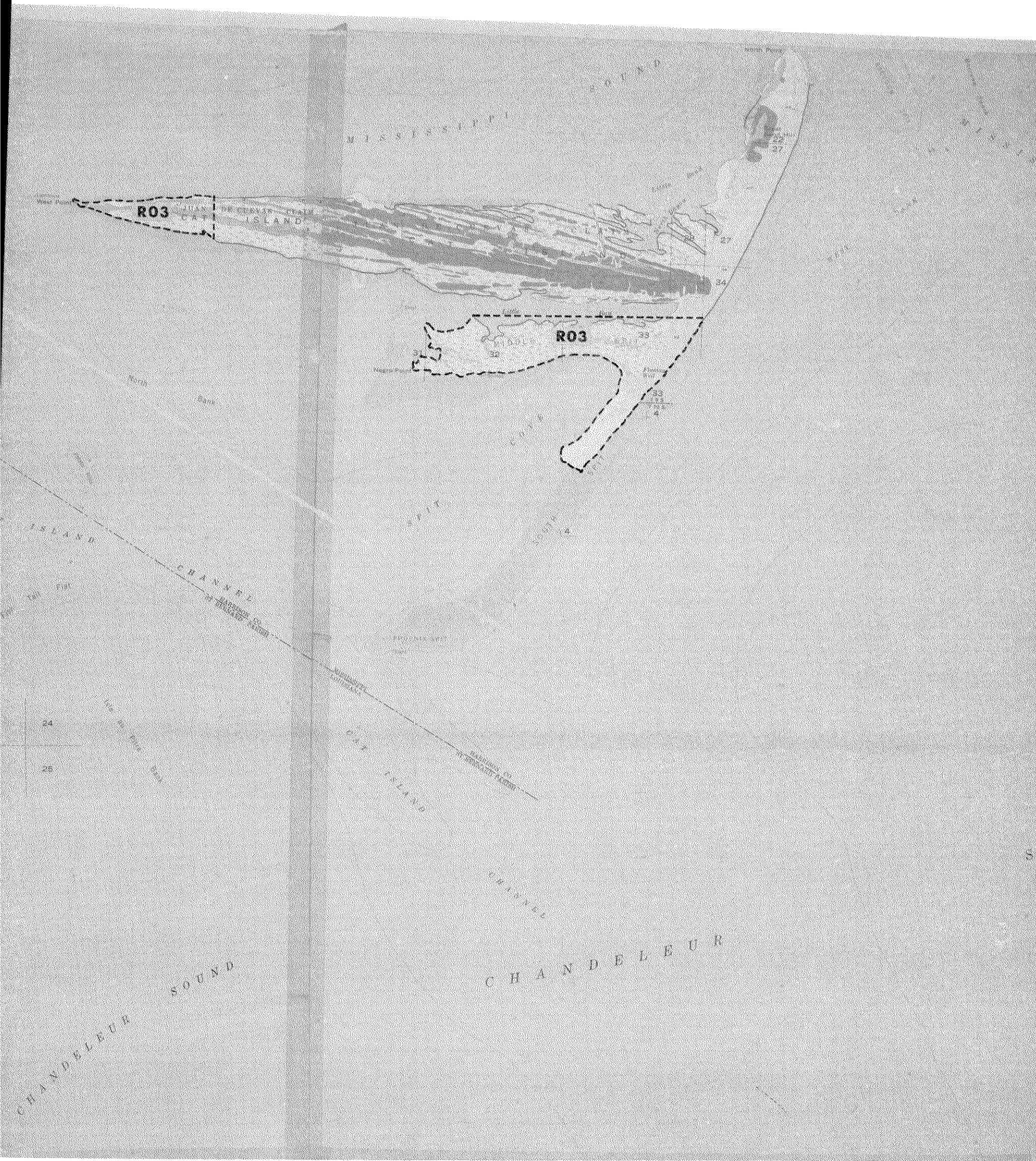
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SHIP ISLAND
MISSISSIPPI



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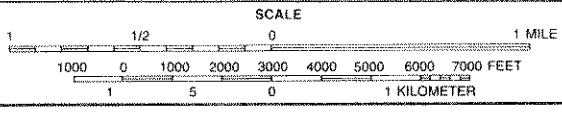
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QUADRANGLE
CAT ISLAND
MISSISSIPPI



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

R03 - CAT ISLAND

State Position: The State of Mississippi supports the addition of all of Cat Island to the CBRS.

Other Comments: Twelve letters supporting the addition of all of Cat Island to the CBRS were received. One letter opposing the inclusion of any of Cat Island in the CBRS was also received. This letter argued that Cat Island does not meet the geologic definitions of a coastal barrier and that it cannot be considered undeveloped. Representative letters of support for Cat Island and the letter of opposition are reprinted below.

Response: In 1982, the DOI recommended that all of Cat Island be placed in the CBRS; however, Congress included only two small parts of the island in the System. The DOI is of the opinion that all of Cat Island fully qualifies as a coastal barrier according to the geologic criteria. The

island is composed of unconsolidated sediments, is subject to wind, wave, and tidal energies, and it protects landward aquatic habitats. It also fully meets the definitions of undeveloped. Although the island has been occupied by the military and used for other purposes intermittently over the last 2 centuries, none of the island is currently developed. The density of structures is well below the threshold of one structure per 5 acres of fastland.

DOI Recommendation: Although the remainder of Cat Island appears to qualify as an undeveloped coastal barrier under DOI criteria, it is not recommended for addition to the CBRS because DOI recommended it in 1982 and Congress considered and rejected it during its deliberations on the CBRA. If the Congress wishes additional information regarding Cat Island, the DOI will provide it upon request.

3

Tom Ketchum
125 1/2 Felicity St.
Bay St. Louis, MS 39520

The Coastal Barrier
Study Group
Dept. of Interior
P.O. Box 37127
Washington, DC 20013-7127

Dear Sirs,

I am writing in regard to the proposed plan which recommends for all of Cat Island (R-03) to be placed in the Coastal Barrier Resource System. As a Gulf Coast resident, I urge your cooperation in making this plan possible.

My family and I spend a lot of enjoyable time on and around Cat Island, and would like to see the island protected from development. I am totally against development on the island at the taxpayers expense. Past history shows how development of an island can ruin its appearance and ecological benefits, therefore, I am strongly against any present or future developmental ideas on Cat Island.

Sincerely Yours,

Tom Ketchum

2

307 Alexander Rd.
Long Beach, Ms 39520
27 January 1987

*The Coastal Barrier Study Group
Department of the Interior
Box 37127
Washington, D.C. 20013-7127*

Dear Sirs,

I understand that your group is considering Cat Island, in the Mississippi Sound, as part of the island coastal system. I am in total agreement that it should be placed under the Coastal Barrier Resource System for future protection and preservation.

Cat Island is one of the larger, prettier islands along the coast. Those of us who have visited there and are familiar with it can take great pleasure knowing that it may be preserved in its natural state for future generations. Thank You!

*Sincerely,
Thomas M. Simpson*

February 3, 1987

7

The Coastal Barriers Study Group
Department of the Interior
P. O. Box 37127
Washington, D. C. 20013

Dear Sir:

I urge you to include all of Cat Island in the Coast Barrier Resource System. To protect only parts of this unique barrier island while allowing development of other parts would ultimately lead to the destruction of the entire island. The total destruction of the Mississippi barrier island, Capri, after its development is an example of what is likely to occur on any of our barrier islands when you disturb their delicate natural balance. Barrier islands protect our mainland from storms. They provide habitat for wildlife and recreation for families. They must all be protected.

I am also opposed to the development of Cat Island because of financial reasons. Federal funds could be used to develop the island if it is not included in the Coast Barrier Resource System. Later more Federal funds would be asked for to help stop erosion and finally vast amounts of Federal disaster relief funds would be required to rebuild after the inevitable hurricane. I am very opposed to such unwise expenditures of my tax dollars.

Sincerely,

David R. Belcher
David R. Belcher
110 N. Country Club Lane
Biloxi, Mississippi 39532

101 Clower Avenue
Long Beach, MS 39560
January 29, 1987

10

The Coastal Barriers Study Group
Department of the Interior
Box 27127
Washington, DC 20013-7127

Dear Sir:

I am writing in reference to the report to Congress that proposes to include Cat Island as part of the Coastal Barrier Resource System (CBRS). I feel very strongly that Cat Island should be included as part of the CBRS and that Deer Island should remain in the CBRS.

I understand that by having these islands included, it will enable the islands to remain as they now are. The Mississippi Gulf Coast is dependent on its tourism. If these islands are allowed to be developed, it will take away from the beauty of the Gulf Coast. We will also have to spend federal money for improvements to the islands (flood insurance, etc.).

Please keep me in mind when this report is considered by Congress.

Sincerely,

Cynthia H. Epperson
Cynthia H. Epperson

899

4802 Jefferson Avenue
Gulfport, Mississippi 39507
May 27, 1987

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

Gentlemen:

As manager and co-owner of Cat Island, Mississippi and authorized representative of the remaining landowners, I strongly oppose the inclusion of any additional portions of that island in the Coastal Barrier Resources System. At this time, the western tip of the island and the southern spit (both low-lying beach areas) are included in a CBRS Unit. A documented report is attached which sets forth in detail the reasons why restriction of the main body of Cat Island to the limitations of the CBRS is inappropriate. Those reasons may be summarized briefly as follows:

(1) Cat Island does not meet the Interior Department's own criteria for barrier island status. Cat Island has a complex and stable structure which appears to have difference geologic origins than other Gulf Islands. [Eluterius 1981] In Hurricane Camille, the most violent U. S. storm of this century, Cat Island remained intact, losing only 0.05 percent of its landmass to underwater shoals. [U. S. Army Corps of Engineers 1970] In contrast, neighboring Ship Island was severed into two islands and has remained in that condition. The main portion of Cat Island is heavily wooded and reaches elevations of 13 feet, considerably higher than much of the adjacent mainland.

(2) The Interior Department has recognized that Cat Island is well suited for development. A February 1976 National Park Service Report states: "The stem of the island does lend itself to construction of major public use facilities insofar as the elevations are concerned. From an engineering standpoint, the elevations permit the island to be extensively (or intensively) manipulated for the construction of public use facilities."

Coastal Barriers Study Group

Page 2

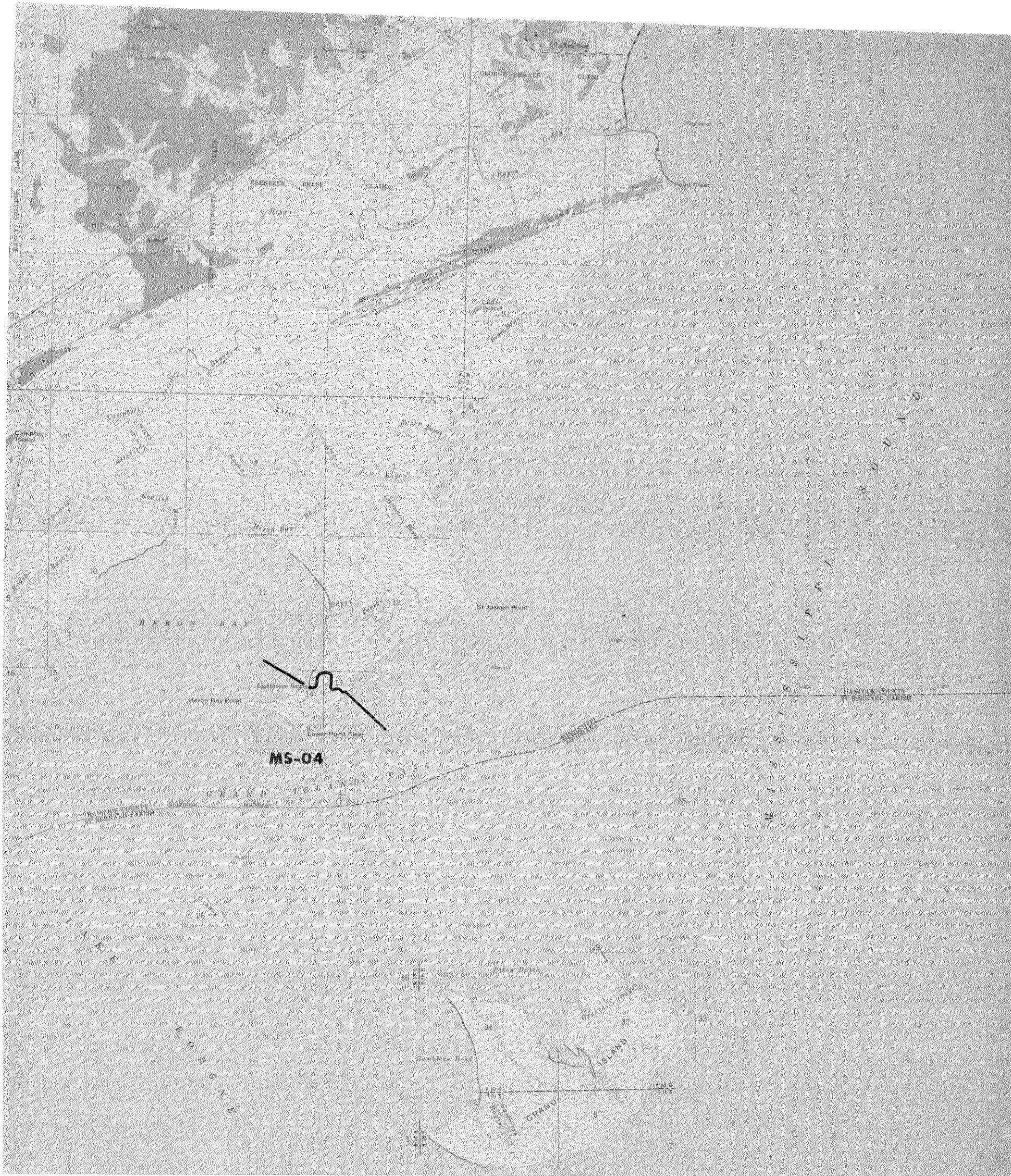
(3) As a stable offshore island, Cat Island is perhaps less susceptible to storm damages than mainland coastal areas. The Corps of Engineers determined that during Hurricane Camille maximum water levels on Cat Island were actually six feet lower than on the adjacent mainland due to the lack of buildup of water. One house on Cat Island which was built in the 1780s withstood all hurricanes for 150 years until it burned in the 1930s. Cat Island is now deed restricted to 16-foot floor levels. Building restrictions also require that both roof and house be tied to pilings and that the pilings penetrate the ground as far as they extend above it. A home built to these specifications survived 220-mph winds without structural damage during Hurricane Camille.

Hurricanes and tidal action are facts which must be dealt with realistically in our coastal areas. Many areas of the Gulf Coast have been developed with federally-subsidized flood insurance under building codes allowing 8-foot elevations in semi-exposed areas and 9 feet on fully-exposed Gulf front beaches. Such irresponsible building invites storm damage. We do not seek federal subsidies but we ask that Cat Island remain eligible for flood insurance rated on a basis not only of elevation but also location and quality of construction. As owners of Cat Island for four generations, the Boddie family appreciates its unique attributes and has no desire to disturb its natural character which is its primary asset. Cat Island should not be included in the Coastal Barrier Resources System but instead should be used as an example for responsible and appropriate coastal development which neither recklessly endangers lives and property nor destroys valuable natural resources.

Yours truly,

George R. Boddie
George R. Boddie

GRB/mc
Attach.



MS-04

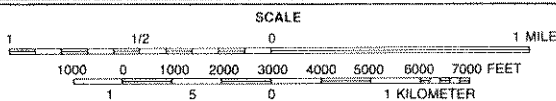
UNITED STATES DEPARTMENT OF THE INTERIOR



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 GRAND ISLAND PASS MISSISSIPPI



- 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.

MS-04 - HERON BAY POINT

State Position: The State of Mississippi supports the addition of MS-04 to the CBRS.

Other Comments: One letter was received suggesting that the marshes south of the Three Oaks and Heron Bay Bayous should be included in MS-04. The letter is reprinted in the General Comment Letters section (letter number 1282).

Response: The marshes south of Three Oaks and Heron Bay Bayous exist in island patches in an extremely low energy area. They do not qualify as coastal barriers under DOI criteria; they are simply marsh islands.

DOI Recommendation: The DOI recommends adding MS-04 to the CBRS as delineated.

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