



## Initiative to Protect Jekyll Island

David and Mindy Egan, Co-Directors

308 Old Plantation Rd.

Jekyll Island, GA 31527

degan1@bellsouth.net

912-577-4655

[www.savejekyllisland.org](http://www.savejekyllisland.org)

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Shore Protection Committee:

The JIA's application for a Beach Stewardship General Permit is fundamentally flawed and should be rejected because it disregards the JIA's own guiding management instrument for conservation on Jekyll Island State Park, its Conservation Plan, which was professionally developed with citizen and scientist involvement and publically vetted six years ago.

Page 48 of the Jekyll Island Conservation Plan deals with the Beach and Interdunal Swale area of the island. The number one and overarching Management Strategy prescribed for that Community is: **To establish a Beach Management Working Group that will develop a comprehensive beach management plan for the Island.**

The JIA Conservation Manager, in his response to comments submitted by the public regarding this application, says the initiative for the application "was motivated: (page one, paragraph three) and informed throughout its development by the Jekyll Island Conservation Plan, a comprehensive framework for protecting and managing the natural resources of Jekyll Island"...

If that were in fact the case, the JIA Conservation Team should have initiated and fulfilled the mandate of the Conservation Plan to develop, in the short-term, a Beach Management Plan which would provide the necessary foundation for carrying out the kind of activities referred to in this permit.

I would like to add that the notion of a general permit is, of course, troubling in its own right because of its precedent setting nature.

In sum, the JIA states in its response to public comments (paragraph one, last sentence.) "Protecting the natural integrity of the shoreline is one of JIA's highest priorities." To realize that objective, this permit should be denied and a recommendation made by the committee for the JIA to develop a comprehensive Beach Management Plan, as prioritized in the JIA's own Conservation Plan six years ago.

The beaches and dunes of Jekyll Island State Park are far too valuable a resource to be managed by a general permit that is not informed by a carefully crafted and publicly vetted Beach Management Plan.

Mindy Egan