

Jekyll Island Technical Comments

Comment (with estimated # of individual comments that provided same or similar comments)
Wildlife Section
Sea turtle nests and emergences maps; add leatherbacks as occasional nesters (pg 27 section 4.3.1)
origin of deer as nuisance species references in plan: "references to over-browsed understory among threats and stresses is not supported by evidence"; constraints to deer should be fences not "a spurious rationale in the CP to provide authority for future culling"
deer are a nuisance species on the island; edge species
several priority raptor species nest on the island; monitoring of these nests should be done for environmental education and protection of the species
"raccoons are a boom/bust species"; "education, not culling is the right tool"; remove use of steel traps on the island for culling of raccoons
Plan should include a mosquito control plan that calls for minimizing spraying
address critical habitat and habitat that could be used for species expansion
remove bird-banding from the island due to mortality caused; document how bird banding is used to support policy decisions
identify protection zones for all nesting bird species that affect trail/development uses
more data needed regarding requirements (reproductive, feeding, refugia, etc.) of priority wildlife species - ed. Note - I think this is a reference to carrying capacity study for habitat on the site
need more data/maps on species/community occurrence and status
address bird species that use the island as a migration stop-over location
address amount of intact habitat needed to sustain various priority species
a plan to reintroduce turkeys should be developed
address meta-population dynamics of some species; interactions between native/nonnative species
feral cat references should include free ranging domestic house cats
what is relevance of 500 foot buffer around rookery? What data was used to generate this distance? Identify functional buffer zone criteria around the rookery
evaluate effect of trails on wildlife uses ("wildlife need human-free refuges")
identify core habitat, necessary landscape linkages and buffers for conservation priorities; develop a ranking system of habitats for priority wildlife; identify buffers for core habitats and landscape corridors
needs more integration between unit specific management techniques and life-history/population requirements of priority wildlife species

Discuss bird banding on island
Vegetation
add specificity for implementation to get from current to desired future conditions
define resources in quantitative terms (what is current species mix proportions of upland maritime forests; what is overstory/understory ratio in understory)
add a priority Plants list for Jekyll
seashore mallow is listed under land cover 18 not not Appendix F; add seaside dropseed to dune vegetation list; check scientific names of plants reference
maritime live oak hammock is listed as imperiled by Natureserve, but not included in SPA designations; clarify what designations are being used
CP should address global rarity ranking vs local/regional rankings for species and habitats
Appendix B: land cover and habitats are different; paved/impervious surface is misleading; lump some categories into Developed
identify how vegetation communities should occur on the island based on soils, edaphic conditions
Include a description of Southeastern Florida Maritime Hammock, Redcedar-Live Oak- Cabbage Palmetto Marsh Hammock/midden vegetative communities
was longleaf pine in occurrence on the island; should it be evaluated for use
forested systems within golf course are too small for species other than edge species; should not be considered ecologically functional
review maps for potentially missing wetland areas
pond formation should be addressed; most ponds are man-made and are not natural
including manmade structures in upland forest category is inaccurate; do not include urban/developed uses in management units except in Urban/develop management unit (management unit #4)
include list of verified invasive species (do not plant list)
update Appendix C with better data (address omissions and updated plant names)
Hydrology
add a hydrologist to staff or on Conservation Committee
some homeowners have surface water wells for irrigation; plan should prohibit use of surface water for irrigation
"Impervious surfaces should be explicitly prohibited by the Conservation" Plan.
evaluate the use of impervious surfaces used in trails
address approaches for conserving surface/subsurface hydrology and tools to be used to meet these approaches
address the sustainability of freshwater demands on the island; development will draw upon freshwater sources
Expand paragraph on Pg. 34 to explain: a) the critical importance of groundwater hydrology, quantity, and quality to the ecosystems covered by the Plan;

b) expand the discussion of the evidence that problems exist but are not well understood
c) raise the level of hydrology analysis as a key component of the Conservation Plan
Fire
Fire risk - "no evidence of wild fire on Jekyll in the past 100 years"; "emphasis on stand-altering fire among the threats is over-blown"; "fire risk is not a legitimate rationale for compromising conservation goals"
fire caused by lightning is a natural process (pg 11 item b)
"Prescribed fire is not an appropriate land management strategy on Jekyll"; burning only begets burning, especially in pine forests
identify techniques to get rid of excess wildfire fuel in small areas/areas next to houses/urban uses
Staffing
Grant writing and grant writer should be noted in plan/added to future staff
Specify <i>which initial actions</i> in the Plan can be implemented by reallocating existing staff or focusing efforts of existing partners
Current funding/staffing section "undermines both the political and environmental purpose of the Plan"; "conservation is fundamental to the Park's value..."
Include some minimal line-items (purposes) for personnel
director of Conservation has too many tasks/responsibilities
use the the title of the NRD position consistently throughout the document
define the NRD position tasks and responsibilities
NRD should report to Executive Director of the Park Authority
define what staffing needs are required for implementing the plan's objectives
establish an independent advisory body separate from the JIA board to guide CP implementation
Set a date-certain for filling NRD position
are there funds for the director of conservation; if not, where to be funded
Is the NRD different from the Director of Conservation? Where is funding for this position?
volunteer coordinator position needed to address volunteer activities and environmental education
Re-label Island Residents/General Public to Citizen Volunteers
emphasize the importance of having a full, time professional conservation staff; efforts to implement the plan will need extensive work efforts to complete, even over the short term
define minimum qualifications of Director of Conservation
draw upon Georgia university system for conservation plan committee makeup
Funding
list actions expected of JIA this budget year

more aggressive support for budget needed to make the Plan work is needed; incorporate a designated conservation budget within the JIA overall budget
define what is funded "on-budget" and "off-budget" ("specify what must be supported by JIA with conditionals") - for instance, what would be supported by the "Conservation Fund"
"Implementation of any aspect of the Conservation Plan should not be contingent" on establishment of conservation fees for island use.
Funding section should show concrete plans for funding actions
identify fees that could contribute to the Conservation Fund, including portion of parking fees; portion of nature and segway tour fees; portion of fees collected for educational programs done by JIA; fines collected for violating certain ordinances; fees from development activities
potential future funding contributors will look to JI's commitment to funding to guide future contributions
research on the island could bring grants to assist in paying for existing facilities
Identify naming rights for programs, trails, other activities that could be used to fund Conservation Fund
define adequate budget along with proposed annual/bi-annual increases
identify economic costs and/or benefits for the direct and indirect economic aspects of JISP conservation
Background
add detailed description of AECOM, staff and principals for work done with JIA and in other areas
add description of "Cabin Bluff land Management" in appendix (at least) to define relevance of their information to plan
reduce the timeframe for the plan from 100 years
GDNR data collection from 2007-2010 non legitimate baseline as new development had started; add data for Islando prior to 2007 to document
reference pertinent laws wherever ecosystems or species covered by laws are discussed
plan should be developed by experts not connected with JIA
add URL links for Jekyll ordinances to pg 55
describe NatureServe Ecological Systems and add links to system
Golf Course
Document and support efforts to qualify for Audubon certification
Document value of freshwater in lakes in golf course as it is important to all wildlife on the island
Environmental Assessment Process
Add separate "no-impact bullet for freshwater (surface/groundwater) in additional to river/marsh/marine hydrology
recognize legal buffers are "minimal" and state buffers will exceed those required by the Clean Water Act/Marsh Protections Act
require LEED or other green building techniques
delete CP's two examples of projects in landscape-scale impacts section
discuss retroactive assessment of ongoing construction projects; grandfather provisions for projects currently underway

Why are there two separate EAP process (one for landscape, one for local) - seems redundant
environmental assessment should not be needed for residential remodeling and renovations if done in the same/existing footprint
What is assurance that stipulations of acts/ordinances referenced will require a permit and not a letter of permission? Add language to assert that all requirements of the acts listed be rigidly enforced
Identify parties that would enforce ordinances created to meet requirements of plan (and/or current ordinances)
address how EAP will take into consideration how proposed impacts will influence critical components (core habitats, landscape linkages, buffers)
if adequate habitat exists for priority species, how will conservation of these elements be part of the EAP; if not, how will key structure/functions be restored/managed
define specific procedures for evaluating projects and when those procedures will begin to be used; including those that would require rejection of a project if appropriate
add existing pet ordinance to appendix
EAP review currently allows projects found in odds with conservation objectives to proceed; needs to be addressed
process should include provision for public/professional review of EAP Team and JIA decisions regarding development proposals
define buffers required for SPAs on the island
environment impacts review should be conducted by an independent panel of experts; an impact review conducted by people dependent on JIA or state of Georgia for their livelihood poses risk that development priorities supercede conservation concerns
Environmental Assessment Team
set up standards for "outside" individuals to be appointed to assessment team
Define the method used to identify the team
Define long-term operations and makeup of EA reviewing team; define expertise required for membership on the team
add leaseholders to EA team (one resident/one non-resident)
add a hydrologist to the EA team (academic credentials)
add an environmental engineer; land management engineer; wildlife biologist
include a public recreational land planning expert
include biology/botany expert (expertise in coastal systems)
include a specialist on shore birds
include a specialist in water quality (perhaps with hydrologist)
three independent (from JIA or state employ), non-political appointees (some say all independent experts)
at least half of the team should consist of individuals outside of JIA/GA employees
Remove names of current individuals holding specified job titles as the title may continue to be on EA team

Long-term future of Conservation Planning Committee - will the range of expertise found on the current committee be available to provide recommendations for future assessment team members
Include statement of power of EA team ("no proposed project will be approved by JIA against the recommendations of the EA team"); recommendations of team should carry more force than currently found in CP; team needs to provide recommendations that will be needed for project approval
Natural Resources Director (NRD) should be team leader (change facilitated to led by NRD)
Why is Chief Communications Officer a member of this team when other areas of "more relevant expertise are not expressly required"
Management and Management Units
review sea level rise when considering hydrological enhancements in coastal wetlands to ensure that enhancement activities do not have unintended consequence of enhancing impacts of future sea level rise
landscape with correct species should be noted
wetlands are good nutrient sinks
plan provides good long-term goals, but is vague on implementation/realization of those goals
address exotic and invasive species within one section
Specific management areas do not adequately define plans for conservation and preserving natural environments
each management unit and subunit should have rules, regulations, and plans for conservation/preservation efforts
Beach management unit does not address beach challenges: ACOE sand sharing systems for the ship channel; removal of rock revetments; barrier island migration; dune restoration as a priority; no future working groups
match management units to vegetation types; state reasons why maps in vegetation section do not match up with management unit sections
clarify management action within the plan to address management controls, actions, steps to plan objectives, evaluation of management
update Island Wide Management section to outline and prioritize options for securing permanent legal protection of the 65% conservation lands; provide specific recommendations for achieving goal
Future Development
Conservation Plan should stipulate that refurbishment/redevelopment of existing commercial/residential properties should be sought before "new" development
Define how acreage of island was determined (from GIS data at GDNR) based on boundary of study area rather than survey of Jekyll Island; define the "land delineation" for purposes of 65/35 determinations
House Bill 214 is not mentioned, but should be
add Section 404 of the Clean Water Act and other wetland regulations to Section 7.3

delineation of natural areas of Jekyll needing protection is needed within the plan to address the 65/35 conservation requirements of the island; criteria and/or standards use to delineate/identify parcels most appropriate for development/redevelopment is needed
visitor carrying capacity study is needed from an independent group from JIA (Bleakley Advisory Group study is inadequate); what is effect of visitation on ecology of island; how to measure impact of visitation levels; should meet study best practices defined by NARRP
include paved lots in developed acreage (part of 35%)
define 35/65 requirements for island (where, what is the % based on,); remove marshlands from calculation
the land between the delineated waters of GA (5.6 ft) and the tree line standard (9.5 ft) should be shown as conservation and as a buffer between upland/beach/estuaries
the incinerator ash disposal area should be designated as a developed area
language in CP mentions "currently limited to not more than 35% of the island's land..." when referencing where development can occur; does this imply that the limit is subject to change?
plan references enforcing lighting ordinance, but doesn't suggest minimizing development on beach-adjacent lands; provide recommendations to limit beach front development
start conservation planning process over to incorporate public in process throughout
hold finalization of conservation plan until it can be integrated with development planning, master planning, fiscal planning, etc. ; plan should precede development activities
Partnerships
Add Atlanta Botanical Garden as potential partner
other stakeholders such as Coastal Georgia Audubon should be included on committees and monitoring activities
partnerships with key elements of JI business community is important for environmental education
add College of Coastal Georgia
Add Garden Club of Georgia as potential partner
Causeway
Add the causeway into the Jekyll plan; discuss bridges/hydrology fixes for causeway
reconnecting Latham Creek by a bridge should be addressed
add definition of the term "island" to clarify 65/35 issues and limit inclusion of the causeway
clarify status of marshland between Jekyll and Mainland within plan
Recreation
Identify broader spectrum of recreation opportunities alternatives; add depth to recreation section
document existing land-based, water-based, community-based resources along with facilities, services, and programs
clarify uses that are "passive recreation" and "active recreation"

identify supply and demand for recreation uses; regional supply of recreation opportunities (Georgia SCORP, trend and forecast demand data by Cordell, SRCCP by USFWS) visitor surveys, etc.
provide appendix of detailed descriptions of resource inventories
identify locations for public viewing and photography
provide qualitative inventory of recreation settings and resources
provide qualitative assessment of existing recreational facilities within JISP
incorporate visitor surveys and analysis of visitor preferences into recreational plan
"recreational trails should be considered "developed" areas on the island"
provide a trend analysis of recreation trends for existing/potential users
use established process to define range of visitor activities across the park
define a timeline for completing recreation surveys, benefits to cost analyses, and visitor use assessments
pg 12 item c: recreation use can have negative impacts on natural systems
addition of new recreational trails should be examined for impacts related to habitat fragmentation, invasive species entry points, and reduction of wildlife habitat; trail locations should be considered based on reducing negative impacts to native ecosystems
four primary areas of CP includes nature-based tourism and recreation; fostering nature-based recreational experiences should consist of more than just trails
reduce the number of projected new trails
CP is silent on visitor capacity of the park; do a rigorous, scientifically valid recreation visitor carrying capacity analysis (address sustainable level and rate of visitation for quality of experience and types of activity/intensity appropriate for visitation and sustainable use of natural resource)
More detail about nature based tourism and environmental education desired - what is the vision and evaluation options for these?
Environmental Education
full time staff/designated funding for nature-based education programs is essential to achievement of education subcommittee goals; but not yet addressed in CP
put section in its own chapter
subcommittee should include persons expert in interpretation as well as EE (NPS professionals, academics, outside professionals)
interpretive planning is needed to identify and recommend ways to assist in implementing experiences
identify current conditions, stories, experiences, policies/guidelines that affect visitor experience/project
identify regional EEI attributes as well as unique resources
assess each existing/potential program in relation to GA performance standards
update themes for EEI on the island; relate to purpose of the park

evaluate new elements for inclusion in the EEI plan included in the CP
address hotel/convention center development and its effects on visitors currently attending and projected to visit the island, with concomittant effects on interpretive and education components of the plan
develop in an EEI plan in concert with recreation and conservation plan
identify threats to resources posed by EEI implementation; identify steps to make desirable experiences more available and/or limit uses detrimental to the resource
address visitor experience, themes, resource, and management goals
add additional information to the plan to reflect relative importance of the EEI to the overall plan
connect resource analysis in CP with the EEI recommendations
update Appendix J to address NAAEE guidelines
recognize diversity of audiences for island
establish a budget for EEI
scientific analysis of the natural, historic, and cultural interpretive themes for the island is needed to improve Appendix J
address why areas have been set aside and/or made accessible to public
incorporate technically innovative communication and analytical technologies to environmental education
education section needs more documentation of decision process and criteria for management objectives
island provides multiple opportunities for nature based education
CP has delegated environmental education section to a subcommittee that has come up with an ambitious vision for nature-based education programs; but the relationship from these recommendations to the CP is unclear
Public Involvement in Plan
"the Plan should make it clear that conservation of a remnant of the natural world for the enrichment of people's lives is the primary responsibility of JIA. The Plan should be strong enough to stand as the measure by which JIA can be held accountable"
Add reminder to plan: "This is public property. It belongs to the citizens of Georgia and they must be involved in any planning process which results in a significant alteration of the island. The opacity of the past must be replaced with the transparency of the future - otherwise any future plan will go the way of the past seven years."
draft of CP should be made available well before public input sessions
identify and incorporate visitor experience/preferences into the preamble, main body, and conclusion of the plan
involve stakeholder groups in plan development (citizens group); involve more stakeholders in planning process (education, recreational, average Georgian, georgian's living off the island)
engage a community participation professional to draft and administer a program for public involvement in future revisions of the Island CP and the upcoming master plan
develop public consensus for future of this public land; use town-hall meetings, questionnaires, letters from public
Develop Citizen Committee to evaluate input from the public; used to drive master planning process

public comments should be appended to each draft of the CP and to the final plan
CP Committee representative should respond to all citizen comments
do not include concrete high rises; concrete access to ocean
planning for recreation/eei/conservation should be done collaboratively and in open process
meetings held at times difficult for attendance; gather more public input on the process, including general public statewide; provide details for popular involvement in planning process, schedule for CP revisions, and dates/times for public meetings
Monitoring and Reporting
Periodic public reporting should be explicit part of plan; define types of reporting that could be done and when within the plan
monitoring should be conducted before, during and after development activities
What are success criteria for buffers
define quantitative indicators for natural systems to be monitored
Cite "wide array of natural resource sciences that have been devoted to development of specific tools and monitoring methods."
General
in Section 8.3 pg. 60 edit St. Catherine's island to replace K with a C
Identify Jekyll Island as a State Park within the plan
review "may" vs "will" affect from sea level rise statements: pg 12, pg 23, pg 24
protect southern area of island from future development
plan was well-organized and reader friendly for non-specialists
add section describing public meetings held to obtain feedback from specialized groups and/or stakeholders
threats are enumerated, but not clearly tied to management solutions; management prescriptions are not specific to threats
Identify ways to incorporate native plants into buffering/dampening the effects of the built environment
plan needs to identify "conservation areas" that will not be developed
edit statement "to create a framework for protecting and managing natural resources on Jekyll Island" to "to create a framework for protecting and managing Jekyll Island"
add a "Defined Terms" section; include terms for "island", "salt marsh", "causeway", "carrying capacity", "natural systems", "appropriate", "developed", "undeveloped", and "State Park" and others
change soils to sediments on pg 36, col 1
place the area included within the 65% conservation under conservation easement
why is the CP a "framework" rather than a comprehensive working plan; the CP does not provide concrete "plan" details; include dates for completion of plan elements

add specific objectives to be accomplished within a specified timeframe
Address fundamental questions about 65/35 issues in plan (altered areas restored within 65% natural area; use restrictions in 65%; management action enhancements in 65% area; legal protections; current delineation on the island)
Identify more information for social and economic perspectives regarding the JISP
Identify alternatives to various options of conservation planning for the island; evaluate full economic and business analyses for each alternative and then provide a selected alternative
review use of word "opportunity"
issues with "X-Men" movie use of dunes; how should activities like this be referenced in the plan (or EAP?)
Conservation committee should read Ecology of a Cracker Childhood by Janisse Ray
Expand regional context information including nature based recreation and educational materials in coastal Georgia
Do a biodiversity study for the island (online drafts of survey, photo-documentation of all species, GPS documentation, reporting by citizens, etc.)
increase marketing outreach for current amenities
independent, peer review of plan
add Appendix I into the main body of the text
change name of plan to A Conservation Plan of an Area around Jekyll Island