

March 7, 2011 draft Conservation Plan: New sections and revisions of the January 4, 2011 draft

(Note: Areas of special concern are bolded)

Preamble (new) - “Context for the Entirety of the Jekyll Island Conservation Plan”: Confirms Jekyll Island’s status as a state park; highlights the need for JIA financial self-sustainability; supports limiting development to 35% of the island’s land area; and **states that the Conservation Plan (CP) will provide for less restrictive protection of wildlife in the 35% development zone compared to the island’s 65% natural areas.**

Section 2.2 (new), Land Area Covered by the Plan (pp. 6-7): Accepts the Master Plan’s calculation of Jekyll’s land area and the number of acres eligible for development under the 65/35 rule. **Confirms that the Master Plan will continue to include as part of Jekyll Island’s land area salt marshes that are above the mean high tide line. Refrains from identifying/delineating the 65% natural area of Jekyll Island.** States that part of the CP’s mission is to review the effects of future development on natural resources.

Section 2.4 (new), Public Involvement (p. 8): Briefly describes the public participation process in the development of the CP. Acknowledges widespread public input and provides a record (Appendix F) of the comments submitted by the more than 300 individuals and groups that remarked on the January 4, 2011 draft CP.

Section 3.2 (new), Hydrology (pp. 9, 12): Discusses lowering of ground water levels and the evidence/sources of reduced hydrological function on the island. Expresses concern over reduced hydrological function and calls for additional studies to improve understanding of the causes of this problem.

Section 3.5 (expanded), History and Land Uses (pp. 13-15): Provides more detail on the island’s history and on the landscape impacts the island has experienced. Among the impacts discussed are the JIA’s circa 1968 attempt to create a marina complex on the southwest end of Jekyll Island, dredging operations in Jekyll Creek and St. Simons Island Sound; hurricanes, and wildfires.

Section 3.6 (new), Cultural Resources (p. 15): Lists archaeological and cultural sites of interest on the island; describes archaeological investigations that have taken place on the island over the past half-century or so.

Section 3.7 (expanded), Ecological Threats and Stresses (pp. 15-16): Provides additional details on the nine ecological threats, stressors and stresses listed in the January draft CP. **Excluded, still, is development/redevelopment as one of the stressors. This seems inappropriate since development is frequently cited among the “threats and stresses” described in the “Vegetative Communities” section of the CP (see pp. 22, 24, 27 and 29 for examples), and the Island-Wide Management section (p. 40) acknowledges that, “future development or redevelopment activities, recreation**

activities, and roadway improvements have the greatest potential to fragment habitat continuity or result in the loss of natural habitats.”

Section 4.2.1.10 (discrepancy), Urban/Developed (p. 30): **The number of developed acres listed in this section is 1,550; the January 2011 draft CP stated that 1,780 acres are classified as developed. No explanation is provided for this significant reduction in the account of developed acreage recorded in the March 2011 draft. No data or explanation is given as to how acreage figures were determined in either the January or March drafts.**

Section 5.3 (new), Causeway Management (p. 44): Discusses strategies for vegetation management and improvement of tidal hydrology impacted by the Causeway; recommends further implementation of research on diamondback terrapins on and adjacent to the Causeway.

Section 5.4 (expanded), Golf Course (p. 54): Added a statement attesting to the importance of forested areas within and along the golf courses as wildlife habitats and calling for them to be managed as a natural resource.

Section 5.4 (expanded), Monitoring (pp. 58-61): Added a section entitled “Reporting” which points out the value of periodic reports that document the results of monitoring efforts conducted on Jekyll Island, and recommends several reporting types for future consideration. **While the CP states that monitoring of the impact of management actions is vital to the achievement of the Plan’s objectives, it only offers a preliminary outline of monitoring activities, stating that, “A more detailed approach should be developed to match staffing and funding levels for implementing the Conservation Plan.” Given the importance of monitoring, which the CP acknowledges, the Plan should formulate a more comprehensive monitoring program and recommend that the JIA provide the staff and funding to implement it.**

Section 6.1 (expanded), Environmental Education (pp. 62-66): Detail has been added to this section by incorporating the Education Subcommittee’s work, which was reported in Appendix J of the January draft CP. **Deleted from that report is the Committee’s recommendation for a full time staff and proper budgeting to implement and coordinate an island-wide, nature-based education program.**

Section 7 (expanded), Environmental Assessment Procedure [EAP] (pp. 67-69): Provides stronger language regarding impacts of development projects that must be avoided, and offers more detail on the potential impacts of development. **Added too is a statement saying, “New commercial buildings must consider certification through LEED, Green Globe or some other environmental certification program.” Asking developers to simply “consider” adhering to the standards of an environmental certification program is insufficient; certification should be required of new commercial buildings. Also expanded is the description of Environmental Assessment Procedure; the final say on the environmental impacts of development/redevelopment projects is still left solely in the hands of the JIA.**

Needed is a provision for professional review of EAP team recommendations and decisions.

Section 8 (expanded), Staffing, Partnerships and Funding (pp. 73-75): More emphasis has been placed here on the need for funding and staffing to secure the objectives of the CP. With respect to the hiring of a Director of Natural Resources, the CP now states, “This Plan simply cannot be effectively implemented without this position. The JIA Executive Director has committed to including a budget for this position for consideration by the JIA Board in the next fiscal year,” which begins on July 1, 2011. **While it’s nice to see that the JIA will recommend a budget for the Director of Natural Resources position, a timeframe should be recommended by the CP for filling this position. Also needed is a detailed job description for the Director of Natural Resources so that the JIA is well-prepared to advertise and fill this all-important position as soon as possible.**

Additional Concerns

A number of the people who submitted comments regarding the January 4, 2001 draft CP noted that the Plan was short on the ‘who, how and when’ of accomplishing the ambitious set of objectives it has for the conservation of Jekyll Island State Park’s natural resources. That apparent deficiency has, to a degree, been addressed in the March 7th draft CP, but there are still instances in which tasks that should have been addressed in some detail are deferred to future committees or work-study groups. The January draft at least called for the formation of these committees/work groups within six months of the adoption of the CP, but those time frames have been deleted from the March draft.

The CP is silent on the need for a visitor capacity study even though the Plan acknowledges that further development could negatively impact wildlife habitats and hydrological functions. Stating that “a number of the island’s natural areas and resources are highly sensitive to human encroachment,” the CP (p. 29) emphasizes that Jekyll’s beaches and primary dunes are particularly vulnerable and may be negatively affected by, “exterior/interior lighting on buildings near sea turtle nesting areas; motorized vehicles on the beach; soil destabilization from pedestrian traffic; trash with tidal wrack or deposited by beach users; human-caused disturbances for nesting and roosting shorebirds and sea turtles.” Given the CP’s concern for the impacts of development, the Plan should, at the very least, include a recommendation that the JIA initiate a professional capacity study, which would include a description of desired future conditions for park resources and visitor experiences; the identification of indicators of quality experiences and resource conditions; establishment of standards that define minimum acceptable conditions, and the formulation of monitoring techniques to determine if and when management action must be taken to keep conditions within established standards.

According to the introduction to both the January and March draft CPs, nature-based tourism/recreation was to be one of the four primary areas of focus for the CP Committee, and “the provision of high-quality nature-based recreational experiences” was to be one of the CP’s main goals. The January draft was criticized for failing to offer a qualitative assessment of existing recreational facilities within Jekyll Island State Park and for its silence on the need to determine visitor preferences regarding desired recreational facilities/opportunities. Rather than address these problems, the March draft has eliminated “Recreation” as a CP subject heading and now says (p. 6) that, “the scope of this Plan did not include specific assessment of existing facilities, user perspectives or recreation needs on the island.” Outdoor recreation deserves to be a major part of the CP. If outdoor recreation is to be beyond the scope of the CP (which it shouldn’t be), then the CP’s statement of goals with respect to recreation should be amended to clearly reflect that choice.

The CP states (p. 40) that it will provide input to Jekyll Island Master Plan regarding the delineation and identification of “parcels most appropriate for development or redevelopment in order to remain in compliance with statutory limitations on subdividing and improving not more than 35% of the land area lying above water at mean high tide,” but the Plan provides no such input. The CP simply says that it will “utilize management recommendations for Management Units, Special Protection Areas, and criteria associated with landscape-scale evaluation in the Environmental Assessment Procedure (EAP) to provide input to updates to the Jekyll Island Master Plan.” Given that planning for a Master Plan update is already underway, and that there is no timeframe for hiring of the Director of Natural Resources—who presumably could provide conservation input to the Master Plan—the CP should formulate its Master Plan input now. The delineation and identification of land most/least appropriate for development or redevelopment is far too important a task to be deferred by the CP.

The January draft CP should have remained posted on the JIA’s website so that people could compare that draft to the March 7th version to determine the extent to which the 300+ public comments regarding the January draft (which are posted on the Authority’s website) are reflected in the latest version of the CP. On several occasions in recent weeks, the Initiative to Protect Jekyll Island asked the CP Committee/JIA to make both drafts available for public review on the JIA’s website, but the Authority did not comply with that request, saying that people might be confused if two drafts were posted instead of just the most recent one. Since the deadline for public comments isn’t until April 1, this problem could still be resolved by the JIA, and should be.