



October 18, 2021

VIA POSTAL MAIL and ELECTRONIC MAIL

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Dear Sirs,

Coastal advocacy organizations have collaborated in preparing the following comments to express our shared concern about critical issues affecting the future of Jekyll Island State Park, which the Jekyll Island Authority (JIA) must explicitly address in the 2021 Master Plan Update (MPU), per O.C.G.A 12-3-234.1. In this letter, we also share potential solutions to the weaknesses we have identified in the proposed MPU.

We hope you will use the authority granted to the Jekyll Island State Park Oversight Committee through O.C.G.A. 12-3-243.1c(4) and file an objection to the fatally flawed MPU. By filing an objection to JIA's proposed amendment, the Oversight Committee will have the opportunity to work cooperatively with JIA staff and Board of Directors to amend the MPU to address the clearly articulated concerns of the public and initiate solutions that can meet the needs of Georgians and the many visitors who deeply value our Jekyll Island State Park.

Positive Updates

The MPU contains several positive additions to the 2014 Master Plan, most notably it:

- incorporates the Conservation Priority Areas (CPAs) as outlined in the 2020 Conservation Plan, ensuring protection of these important areas by the Master Plan.
- reclassifies priority habitat from developed to undeveloped areas and designates them as CPAs. Most notable of the reclassified locations is the "Beach Prairie" paralleling Beachview Drive. It offers "a rare experience of unobstructed ocean views along the beachfront," which is one of Jekyll's natural treasures.

These updates to the Master Plan are consistent with the mission statement of the JIA: "...maintaining the delicate balance between nature and humankind."

Weaknesses

Despite the positive additions, the MPU fails to address the most pressing issue affecting Jekyll's future - the increase in the extent and density of residential and commercial development. The JIA staff and

Board often refer to the importance of the 2018 Carrying Capacity and Infrastructure Study commissioned by the JIA for guidance on development. This published study states that without adding any new development, visitation will increase significantly, warning that Jekyll will reach its functional capacity by 2021 – which is now. However, while the JIA professes a determination to maintain Jekyll’s character and uniqueness as a vacation destination, that admirable goal is not reflected in the specifics of the MPU.

Public concern over additional development of Jekyll Island is evident in the MPU survey conducted on behalf of the JIA by the University of Georgia’s Carl Vinson Institute of Government. Surprisingly, the survey failed to include a question on the development issue, but at least its final question asked, “What else would you like us to know?” By far, the dominant response among the 5,417 people who responded to this open-ended question was that further commercial and residential development of the island would degrade Jekyll’s natural character and traditional appeal. Opposition to expanding Jekyll’s built environment was also evident in the comments on proposals under review by the JIA calling for commercial and residential development of part of the island’s 63-hole golf course complex. More than 90% of those comments were critical of such an idea. (See Master Plan Update – Appendix C, 244 pages of responses to Survey Question #15 “What else would you like us to know?”¹)

A significant weakness of the MPU is the failure to set clear goals concerning future development and how the JIA will measure the extent to which they successfully implement their objectives. In effect, there is no provision in the MPU to establish essential growth controls over the type and density of development but rather just a series of general “recommendations.”

Accordingly, our organizations are urging you to object to this plan update, as provided in 12-3-243.1 of the Georgia Code regarding the Jekyll Island State Park Master Plan.

Solutions

To make the MPU more effective, the Oversight Committee must file an objection to the proposed amendment. At that point, the Committee should direct JIA to carry out the following:

- 1) Amend the MPU to include a moratorium on any building within Jekyll Island State Park, except for the Buccaneer Hotel Property, which is slated for redevelopment and already under a lease. The moratorium is essential because Jekyll has already reached its functional capacity, and without intervention will exceed that capacity and significantly diminish the quality of the destination and experiences generations have enjoyed. This is a matter of some urgency due to the recent proposal to convert part of the golf course complex into commercial and residential space.
- 2) Amend the MPU to commit the JIA to develop a detailed Capacity Plan that addresses the issues raised by the 2018 Carrying Capacity and Infrastructure Study. Such a Capacity Plan should delineate the allowable future uses of Jekyll’s land area and include clearly articulated goals and objectives along with a timeline for their implementation and evaluation. We recommend that the Capacity Plan have a life span of twenty years to accommodate the projected growth in

¹ Draft Appendix C - Jekyll Island Master Plan Update Online Survey Results. Responses to Q15 “What else do we need to know?” begin on page 97 of the 344-page document. Available online at: <https://www.jekyllisland.com/jekyllislandwp/wp-content/uploads/2019/02/Draft-Appendix-C-of-Jekyll-Island-Master-Plan-Update-1.pdf>

Georgia's population. Further, we recommend that the Capacity Plan address the concerns raised by the 2020 Jekyll Island Conservation Plan and cited in the MPU regarding:

- Land management to minimize fragmentation of wildlife habitat. As stated in the Conservation Plan, "future development or development activities, recreation activities, and roadway improvements have the greatest potential to fragment habitat continuity or result in the loss of natural habitats."²
- Sea level rise; and
- Shoreline erosion, protection, and resiliency.

The development of a Capacity Plan should be assigned to an independent, publicly accountable party, using a process that ensures transparency and offers opportunity for robust involvement of all stakeholders.

- 3) Lastly, amend the MPU to provide clarity and guidance regarding the controversial Golf Course Master Plan, currently under review by the JIA Board. The draft Golf Course Master Plan released for public comment in September 2020, revealed that JIA is contemplating redevelopment of the island's golf course complex. This threat of development within valued open space was met with strong objection from the public.

By failing to address how the golf courses will be managed, the MPU neglects the fact that the JIA proposed converting part of the golf course complex to commercial and residential development, including an assisted living facility, to help finance the needed golf course renovations, estimated to cost \$18 million.³ Allowing residential and/or commercial buildings within Jekyll's golf course complex would be character-altering enterprise for this valued recreational area.

Rather than paving open space golf courses within the State Park to cover the cost of modernizing the courses, the State of Georgia should invest in the needed improvements. JIA cannot foot the bill alone, and State funding for improvements on a State Park are justified in many ways:

- **Tradition:** The State of Georgia has traditionally covered the cost of major capital improvement projects within Jekyll Island State Park, including the initial construction of Jekyll's 63-hole golf course complex, \$50 million for a new convention center and associated facilities, \$17 million for the new 4-H Center ("Camp Jekyll") and, \$8 million for the restoration of the island's rock revetment.
- **Precedent:** The previous major renovation of part of the golf course complex – the \$3 million modernization of the Pine Lakes course in 2002 – was paid for by the State.
- **Opportunity:** The State currently has maxed out its reserve fund at \$4.29 billion (the statutory cap is 15% of the previous year's net revenue) and has an additional \$2.18 billion in uncommitted federal funds available. Just a fraction of 1 percent of these surplus funds

² Jekyll Island Conservation Plan 2020. Pg. 55. Available online: <https://www.jekyllisland.com/jekyll-island-authority/jekyll-island-conservation-plan/>

³ Jekyll Island Authority Proposed Vincent Golf Master Plan. Presented to JIA Board November 10, 2020, by the Bleakly Advisory Group. Available online: <https://www.jekyllisland.com/jekyllislandwp/wp-content/uploads/2019/01/Jekyll-Island-Golf-Master-Plan-Financial-Analysis-11102020F.pdf>

would be more than enough to pay for the proposed modernization of the golf course complex.

- **Protection:** State funding of the proposed changes would allow the golf course complex to remain separate from Jekyll's built environment, retaining the unique natural look and appeal of Jekyll's renowned golf courses.

Thank you in advance for your attention. Again, we implore the Oversight Committee to object to the proposed update and advise the JIA to implement the solutions we introduced here.

Contact us at any time to discuss these issues. We look forward to working with you and the JIA to ensure the Jekyll Island State Park remains as it has always been intended – a destination where Georgians can enjoy nature, history, and recreational activities.

Sincerely,



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