



Center For A Sustainable Coast  
221 Mallery St. Suite B  
St. Simons Island, GA 31522  
912-638-3612  
[http://www.sustainablecoast.org/  
susdev@gate.net](http://www.sustainablecoast.org/susdev@gate.net)  
**David Kyler, Executive Director**

**Comments in response to JIA's RFI 266**  
**Submitted by Center for a Sustainable Coast**  
**September 17, 2010**

---

*[Note: these comments are also endorsed by Satilla Riverkeeper®. Other endorsements are pending.]*

1. Planning, implementation, and monitoring

Reference to the master plan should be well-integrated into daily administrative and planning activities of JIA. Decisions about contracts, maintenance, design of new or redeveloped land uses and structures, and replacement of outmoded facilities must be guided by the master plan, and done with attention to consistent adherence to goals, objectives, and specific performance criteria.

Too often, plans are prepared as a pro forma exercise with little follow-through and weakly structured guidance. In such cases, once drafted and adopted, plans become little more than a rationalization of the status quo, or false justification for decisions made opportunistically for reasons of expedience, which do not responsibly serve the public. To prevent the tendency for 'dead' or dysfunctional plans, the Jekyll Island Master Plan (MP) should include the following:

- A. A well worded, concise vision statement that incorporates the supremacy of serving the public interest, including the affordability and quality of experience in relation to Jekyll's natural environment as well as visitor services and facilities.
- B. Specific goals and measurable objectives that are based on the vision statement.

- C. Administrative requirements for annually reviewing the condition of the state park in relation to past assessments, in light of the objectives and work program of the MP.
- D. Specific, measurable performance criteria that are linked directly to one or more MP objectives and the work program that supports those objectives.
- E. A thoroughly detailed process for using the MP and related goals, objectives, and performance criteria to support substantive public involvement – for gathering information not only about public needs and experience as users of the JI State Park, but also to gain helpful insights in support of improving the MP and how it is administered.
- F. Procedural requirements for the JIA to use in conducting board meetings, including reference to the MP and soliciting feedback from the public about all aspects of the MP and its implementation, particularly in relation to adopted performance criteria. Requirements for specifically responding to – and, as appropriate, incorporating – public comments regarding planning revisions should be adopted and routinely followed.
- G. A rigorous and carefully administered procedure for amending the plan should be prescribed, based on field assessment of conditions on the ground, public opinions about visitor experience and innovative ways to enhance it, as well as emerging needs, opportunities, challenges, and problems, both administrative/budgetary and environmental.
- H. Criteria for identifying needed consulting services and for selecting qualified firms to provide them. In the past there has been much avoidable controversy created by incompetent or incomplete analysis and recommendations provided to JIA by consultants who were simply ill-prepared and under-qualified. Such counterproductive disruptions not only degrade JIA's reputation, but they squander public funds and reduce JIA's ability to serve the public interest. By providing a reliable, objective, and transparent process for selecting consultants, and objectives for using them, the value of services in support of the MP can be greatly improved.
- I. In addition to the above, elements of the MP should address and set forth work activities and performance criteria for at least the following:
  - a. Conservation resources by condition, location, use, threats, and protection.
  - b. Facilities assessment, including overnight visitor accommodations, commercial services (shops, restaurants, entertainment, recreation, etc.), their use, condition, maintenance/replacement, and cost.
  - c. Land use and design criteria for areas designated for development as well as recreational and interpretive access to natural areas, consistent with the conservation element.
  - d. Ongoing and routinely updated evaluation of the required apportionment of land area for conservation versus development – as well as the interface between these areas. For instance, visitor experience might be enhanced by making changes in the perception of natural areas afforded by the use and design of developed areas. Likewise, protection of natural areas could possibly be enhanced, and the costs for related remediation reduced, by giving more attention to how development impinges on adjacent conservation lands. This might include use of undisturbed natural buffers as well as better designed access points and structures such as kiosks, gateways, and rest areas.

- e. Economic and business assessment, including revenues generated by distinct sources such as visitors and commercial operators (hotel leases, etc.), and costs of operations by line item, for instance but not limited to: JIA administration (by position), board functions (travel, staff support, other costs), service and maintenance of developed areas, protection and maintenance of conservation areas, infrastructure (both capital and operating costs) such as roads, water and sewer systems, and recreational facilities.
  - f. Board eligibility, service, and balance should be carefully set forth to help ensure that appointments serve the public interest. In addition to individuals who are qualified due to their education and work experiences, appointees to the JIA board should be from a diverse and complementary background, including those having knowledge relevant to administering and planning public facilities and services as well as conservation areas. Any activities likely to be causes for conflicts of interest must be carefully scrutinized, and those who are selected for JIA appointment should be discouraged from participating in them. If individuals are likely to be prone to incurring such conflicts, they should not be appointed to the JIA.
2. Designating eligible areas (65/35 split)
- A. Due to changing sea level caused by climate change (the conservative projection of the IPCC currently being one meter rise by 2100), plus the difficulty of accurately measuring elevation in tidal marsh areas, it is advised that tidal marsh not be included as part of the official land area of Jekyll Island. Moreover, marshes are already protected (in certain ways) as conservation areas under Georgia's Coastal Marshlands Protection Act.
  - B. Land use classifications should be based on professionally established standards, such as those being cited in comments submitted by the Initiative to Protect Jekyll Island. Any disturbed sites such as golf courses (including constructed water hazards) and nature trails should be classified as developed, not natural areas.
3. Design issues
- A. As stated in my last RFI comments, submitted in June 2006, the scale and design of facilities on Jekyll Island are critical to preserving and enhancing visitor experience. Monolithic, massive buildings should not be permitted. The existing building standards are so permissive (for example, a building height "limit" of 64 feet), that they fail to enhance the character of the island. Worse yet, these ill-conceived standards create the false sense that worthy design objectives are being met, while legitimizing inappropriate building scale that undermines the long-valued, traditional experience of visiting Jekyll.
  - B. Similarly, building materials selected should blend with the historic and natural ambience of Jekyll Island. Featuring design with large spans of steel, masonry, glass, pavement, or other industrial materials must be avoided. Pedestrian use of the island must not only be accommodated but encouraged, which means enhancing visual appeal and creating attractive areas for observation, resting, and conversation that are conducive to the allure of this unique state park.

#### 4. Environmental enforcement

- A. Past planning for Jekyll Island has indicated a disturbing degree of neglect – or ignorance – of relevant environmental laws. For instance, the original “redevelopment” plan by Linger Longer Communities proposed a significant amount of construction within the jurisdiction of the Shore Protection Act, which if implemented would have created avoidable hazards to lives, property, and natural features that are prevented by that state law. Likewise, the draft Conservation Plan consisted of an extensive cataloguing of natural features, communities, and species, but it prescribed no means for ensuring compliance with state and federal laws intended to protect natural resources. It is imperative that future planning for the island, and planning implementation, reflects well-informed grasp of all applicable environmental laws, making appropriate accommodations to them from the beginning stages of project proposals throughout revisions, construction, and follow-up.
- B. This means that the plan should prescribe reliable procedures for initial assessment of likely impacts and how they will be addressed through steps to comply with applicable regulations. By providing a method for early identification and evaluation of these issues, more prudent use of JIA’s planning budget will be ensured, and costly legal conflicts over potential violation of environmental laws will be averted. When major impacts are anticipated in initial assessment, adopted procedures should require development of alternative plans to minimize impacts, not only to reduce related risks, but to limit the cost of complying with regulations and preserving the environmental quality that is so essential to Jekyll Island’s visitor experience.