



September 8, 2010

Jekyll Island Authority
Att: Jim Broadwell
100 James Road
Jekyll Island, Georgia 31627

Jekyll Island Authority,

The Glynn Environmental Coalition submits the following comments in response to the Request for Information issued by the Jekyll Island Authority to help assist in revising the Jekyll Island Master Plan.

Sincerely,
Daniel Parshley, Project Manager

Comment 1. – A. The standards being used for "the land of Jekyll Island" for the 35% Developed and 65% Conservation appear to be incorrect. The 1996 JI Master Plan (MP), on page 9, there is a map of JI. On this map is a "4.3 mean high water mark", which is the level where land is considered "useable". But the state of Georgia claims below the 5.6 foot elevation mark as the "waters of Georgia" under the Coastal Marshlands Protection Act (CMPC), and this standard applies on the back side of JI, and another law protects the beach, and another set of standards apply on the beach side. But there is also the 9.5 tree line standard, which should be used as the developed/undeveloped standard to protect the fragile boundaries of Jekyll Island (JI).

B. The 65% of JI to be conserved should be placed under a conservation easement and permanently protected. Once land is developed, conversion to a natural state is next to impossible due to the disturbance to the underlying soil structure.

C. The MP does not specially designate "conservation areas" (the parts of the island that will not be developed) and a plan for these areas, and the developed/recreational areas. The plan should address how conservation measures will be conducted in each area, and designate the areas on a map.

D. The plan should define conservation measures for the developed and undeveloped areas. Wildlife will not respect boundaries between the two areas. Also, areas between forest and

meadow are important for many species. In the case of Jekyll Island, these will often have overlap between conservation and development areas.

E. Since the current conservation plan is a "Conservation and Recreation" plan, critical habitats like bird nesting areas should have a "stand off" area designed in by routing paths trails, and viewing areas an appropriate distance away. Each species will have a comfort level for how close people come to their nesting or roosting area. The minimum distance from these areas should be designated in the MP. Furthermore, the MP should identify these areas as "critical habitat" and be designated as such on a map.

F. Paths, trails, and viewing areas should be considered "development". Since people will frequent these areas, plans should include where bathrooms and trash collection will be located and how they will be accessed. The plan should keep in mind that bathrooms will be high traffic areas and popular for picnicking and other activities. Design and location of amenities can direct people away from critical areas while still making points of interest for nature viewing accessible. The vast majority of people will use the designated trails and paths for viewing or photography.

G. It is important that the Conservation Plan be part of the development plan, MP, and not a standalone document that guides conservation and development. Completion of the Conservation Plan is needed first in order to incorporate it into the MP.

Comment 2. - Since the last MP in 1996, a lot of erosion has taken place at the north end of JI, and accretion at the south end of JI. A new survey is needed, and the results may show there is more land now and therefore, more for development, or less land and reduced development. At a minimum, the Master Plan should use national standards for definitions of "developed" and "undeveloped" land for land use classification.

Comment 3. – The Jekyll Island Conservation Plan should be completed before revising the Jekyll Island MP. Otherwise, the MP will be incomplete and not have the minimum information needed for planning amenities and development.

Comment 4. - French drains and swales are good tools and recharge the groundwater, which allows for a controlled release to wetlands through seeps and such. In the final analysis, the water holding structures for any new development need to be designed with realistic capacity goals in mind. Usually, the pervious surface also costs less. The Request for Proposals (RFP) and the resulting bids for the pervious surface and impervious surface should include performance standards based upon actual rainfall records. An "impervious" surface can be mitigated with a leach field under the surface or "French Drains" that hold the water and let it percolate into the ground. The only other option to an impervious surface is a retention pond, which is expensive in land use and construction. There are many options to achieve the goal of reducing or eliminating excessive runoff.

Comment 5. – The incinerator ash disposal area west of the former incinerator location should be designated as a developed area. Furthermore, the area should be designated for further investigation by sampling and analysis to determine the extent of contamination by combustion byproducts such as dioxin. Elevated dioxin levels found in Jekyll Creek by the National Oceanic

and Atmospheric Administration are most likely emanating from the incinerator ash disposal area.

Comment 6. - Several bad decisions by the JIA over the years that have damaged the economic viability Jekyll Island and driven away the people that kept the park a popular destination.

Just a few of the major mistakes are:

A. Driving away families – Jekyll Island Authority (JIA) Director Georgia Chambliss bulldozed the picnic tables into the marsh and destroyed most all the picnic areas around the island. He did not want people picnicking, but failed to realize these were family reunions that filled the motel rooms and the restaurants at night. Many other things were done to drive families away like closing the fishing pier at dusk. Jekyll managed to kill their "bread and butter" business. Until families are made welcome again, the future of Jekyll will remain uncertain. Space, like picnic areas, for large gatherings are needed as part of the Master Plan. Historical picnic areas should be restored.

B. Motels were harvested – Investors were allowed to harvest the motels and little or no money was put back into the facilities for maintenance. The JIA made this possible by not requiring and enforcing minimum standards and helped facilitate the demise and running the island into the ground.

C. Commercial fishermen - Shrimpers and the fish house were driven from Jekyll in order to have a restaurant (only) on the dock. The draw to the dock was gone and the masses of people that came to watch the catch being unloaded, bought shrimp, and ate at the small restaurant are gone. This significant ambiance of Jekyll Island needs to be restored.

D. The bet on golf - All Jekyll Island's eggs were put into one basket as a golf destination at the time golf courses were going in around coastal Georgia at several per year. The other courses are struggling, and Jekyll is no different.

E. Affordability – Key to any economic recovery plan for JI will be to provide a State Park that is affordable for citizens of ordinary income. Accommodations should be available that are affordable for 90% of the Georgia population, which should be based upon data from the Georgia Department of Revenue.

Comment 7. - We can go on and on about all the bad management Jekyll has endured. Until there is a vision for the future of Jekyll, the Island will continue to struggle. The plan right now appears to be "if we build it they will come." In light of all the mistakes of the past, they will not come unless families and the other "bread and butter" clientele are made to feel welcome again. A day or vacation with the family at Jekyll leads to planning a convention at the destination. This point seems to be still lost on the JIA.

A good business plan starts with "what is your market". Jekyll would be well served to look at the past when the island did well and put a lot of effort into getting their market back. Once the JIA knows the market they serve, building the needed amenities will become evident and should be reflected in the Master Plan.