

Evaluation Findings
Georgia Coastal Management Program
May 2001 – November 2005



Office of Ocean and Coastal Resource Management
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I. EXECUTIVE SUMMARY

A. OVERVIEW

The Coastal Zone Management Act (CZMA) of 1972, as amended, requires the National Oceanic and Atmospheric Administration (NOAA) to conduct periodic performance reviews or evaluations of the performances of States and Territories with Federally approved Coastal Management Programs. The review described in this document examined the operation and management of the Georgia Coastal Management Program (GCMP) for the period of May 2001 through November 2005. The GCMP is administered by the Georgia Department of Natural Resources (DNR).

This document describes the evaluation findings of the Director of NOAA's Office of Ocean and Coastal Resource Management (OCRM) with respect to the GCMP during the review period. The fundamental conclusion of these findings is that DNR is successfully implementing and enforcing its federally approved coastal management program. The recommendations made by this evaluation appear in **bold** and follow the relevant section of findings. Two types of recommendations are possible: (1) Necessary Actions address programmatic requirements and *must* be implemented by the indicated date; and (2) Program Suggestions describe actions that NOAA believes DNR should take to improve the program but that are not currently mandatory. Program Suggestions that are reiterated in consecutive evaluations due to continuing problems may be elevated to Necessary Actions. If no dates are indicated, DNR is expected to address the recommendations by the time of the next §312 evaluation, which will occur approximately three to five years following the release of these final evaluation findings. This document contains four Program Suggestions and no Necessary Actions. NOAA will consider the findings made by this evaluation when making future financial award decisions regarding the GCMP.

B. SUMMARY OF ACCOMPLISHMENTS

The evaluation team documented a number of GCMP accomplishments during the review period. These include:

Issue Area	Accomplishment
Operations and Administration	Continued Establishment and Maturation of Program, which includes the reauthorization of the program under Sunset Legislation during the review period. NOAA commends the GCMP for its efforts in developing a well-balanced program and in identifying key positions and moving resources to address newly developing Program areas.
Operations and Administration	Local Government Technical Assistance. The GCMP's provision of technical assistance has brought recognition for the value of the Program and its staff in supporting successful local community projects that encourage further coordination and planning.

Operations and Administration	Coastal Advisory Council (CAC). The GCMP is commended for reconstituting the CAC. The staff support given to the CAC reflects the dedication and leadership of the State in its partnership at the local, state, and federal level in management of coastal resources.
Operations and Administration	Coordination. The GCMP coordinates well with their partners in local, state, and Federal agencies, non-profit organizations, and the general public in Program implementation.
Operations and Administration	Outreach. The GCMP continued to provide high-quality, relevant educational programming and increase efforts to improve communication and provide information on coastal program issues to GCMP partners, coastal decision-makers, and the public.
Operations and Administration	The Georgia Coastal Non-point Pollution Control Program (CNPCP). The State is commended on working proactively to address non-point source pollution, while still working to achieve full approval of its CNPCP.
Operations and Administration	Implementation of the Coastal and Estuarine Land Conservation program (CELCP). The GCMP is commended for its preparation of and participation in CELCP with its development of a CELCP plan.
Coastal Incentive Grants	Improvement of the CIG Program. During the evaluation period, the Coastal Incentive Grant (CIG) Program has continued to have significant impacts on and provide benefits to GCMP constituents in the coastal zone. At the local, state, and national levels, the GCMP has formed strong partnerships and gained the trust of local governments, resulting in a multitude of successful coastal projects. Many parties that the evaluation team met with repeatedly cited the importance of these grants in supporting research activities, planning studies, and local ordinance development; many of which wouldn't occur without CZM funding.
Coastal Incentive Grants	Research. The GCMP and the CAC are commended on their progress towards ensuring that CIG funded research supports GCMP needs and its use of partnerships with the research community to obtain and better integrate science in coastal decision-making.

C. SUMMARY OF RECOMMENDATIONS

In addition to the accomplishments listed above, the evaluation team identified several areas where the program could be strengthened. Recommendations are in the form of Program Suggestions (PS). Areas for program improvement include:

Issue Area	Recommendation
Operations and Administration	PS: Local Government Technical Assistance. Local elected and appointed officials obviously are in need of additional resources and tools to support decision-making that affects coastal resources. The GCMP and CAC should consider how to best support local

	governments through the GCMP technical assistance function and the CIG Program, such as by finding the means to increase the number of GCMP technical assistance staff; continuing to support and promote resources and programs such as the “Alternatives for Coastal Development” project with CSC, the Green Growth Guidelines, NEMO, and other outreach and education; or providing more formal assistance to local planning efforts.
Operations and Administration	PS: Sunset Legislation. In response to increased development and impacts along Georgia’s relatively undeveloped coast, permit activities have occurred which highlight the importance of the established regulatory program which complements other coastal management activities. As the deadline for the CMA sunset provision approaches, the State should develop a strategy whereby they can garner support for continued implementation of the GCMP through reauthorization of the CMA. The GCMP should address the public perception of it being primarily a regulatory program by highlighting the full range of benefits that accrue through GCMP implementation.
Operations and Administration	PS: Coastal Advisory Council. The GCMP and the CAC are encouraged to continue evaluating and clarifying the role that the CAC should play in most effectively supporting Program implementation.
Operations and Administration	PS: The 40/60 split should be re-evaluated and potentially modified in light of level or declining federal resources. The CZMA requires priority use of the federal funds to ensure adequate staff and program operations necessary to manage increasing coastal development pressures, before funding discretionary activities like the CIG Program. In addition, a portion of the CIG funds should be targeted to directly support the research needs of Coastal Resources Division (CRD). These funds would remain as part of the CIG Program, but would be dedicated solely to supporting the research or other needs of CRD with CRD setting the themes or specifying the research projects as well as choosing the projects that get funding.

II. PROGRAM REVIEW PROCEDURES

A. OVERVIEW

NOAA began its review of the Georgia Coastal Management Program (GCMP) in October 2005. The §312 evaluation process involves four distinct components:

1. An initial document review and identification of specific issues of particular concern;
2. A site visit to Georgia including interviews and a public meeting;
3. Development of draft evaluation findings; and
4. Preparation of the final evaluation findings, partly based on comments from the state regarding the content and timetables of recommendations specified in the draft document.

B. DOCUMENT REVIEW AND ISSUE DEVELOPMENT

The evaluation team reviewed a wide variety of documents prior to the site visit, including: (1) the Federal program approval document and Environmental Impact Statement; (2) financial assistance awards for the review period, associated work products and semi-annual performance reports; (3) official correspondence; (4) previous evaluation findings; and (5) relevant publications on natural resource management issues in Georgia.

Based on this review and on discussions with OCRM's Coastal Programs Division and GCMP staff, the evaluation team identified the following priority issues:

- Effectiveness of Georgia in monitoring and enforcing the core authorities that form the legal basis of the GCMP;
- The manner in which recent changes in state government may affect the GCMP;
- Implementation of Federal consistency authority;
- Implementation of enforcement and compliance mechanisms;
- The manner in which the GCMP coordinates with other State, local, and Federal agencies and programs;
- Effectiveness of technical assistance, training, and outreach to program partners in order to further the goals of the GCMP; and
- The State's response to the previous evaluation findings dated December 27, 2001.

Notification of the scheduled evaluation was sent to Georgia DNR, relevant Federal environmental, and regional newspapers. In addition, a notice of NOAA's "Intent to Evaluate" was published in the *Federal Register* on September 29, 2005.

The site visit to Georgia was conducted on December 12-16, 2005. Susan Melnyk, Evaluation Team Leader; Elisabeth Morgan, GCMP Program Specialist, OCRM Coastal Programs Division; and Todd Janeski, Maine Coastal Program, formed the evaluation team.

During the site visit, the evaluation team interviewed GCMP staff, senior DNR and other state agency officials, federal agency representatives, coastal researchers, environmental educators, nongovernmental representatives and private citizens. Appendix A lists persons and institutions contacted during this review.

As required by the CZMA, NOAA held an advertised public meeting during the evaluation on December 13, 2005, 1:00-4:00 p.m. at the Coastal Electric Membership Cooperative, 1265 South Coastal Hwy (US-17), Midway, Georgia. The public meeting gave members of the general public the opportunity to express their opinions about the overall operation and management of the GCMP. Appendix C lists individuals who registered at the meeting.

NOAA OCRM also accepted written comments during and for up to three weeks after the evaluation site visit. OCRM received two sets of written comments. A summary of the comments and NOAA's responses are included in Appendix C.

The crucial support of GCMP staff with the site visit's planning and logistics is gratefully acknowledged.

III. COASTAL AREA DESCRIPTION

THE GEORGIA COASTAL ZONE

The Seaward boundary of Georgia's coastal area extends to the outer limits of State jurisdiction, which is three nautical miles seaward from the mean low watermark. Included within the coastal area are both waters of the State and submerged lands. Interstate boundaries include the South Carolina state border on the north and the Florida state border on the south. The inland boundary of Georgia's coastal area is the political boundaries of the eleven counties that either border Georgia coastal waters or are immediately adjacent to the first "tier" of counties that do. Encompassed within this boundary are all upland areas in these eleven counties, as well as all waters of the State and all submerged lands within the defined coastal area. The eleven counties described by the coastal management area contain all of the tidally influenced waters of the State, which was the rationale used to determine this inland boundary.

Georgia's Inland Coastal Boundary



IV. PROGRAM DESCRIPTION

Administratively, the GCMP is housed within the Department of Natural Resources. The Ecological Services Section (ESS) of the Coastal Resources Division (CRD) is given the authority under the Georgia Coastal Management Act to administer and manage the program and monitor its progress; make consistency determinations for Federal projects and Federal permits, licenses and assistance; and coordinate among the networked agencies. ESS also issues permits for projects under its purview. Finally, it administers all the federal CZM funds.

The enforceable policies of the GCMP are included in 34 State laws. The program also includes several additional local, regional, State, and Federal programs, agencies, authorities, and commissions. Key program authorities are:

Georgia Coastal Management Act,
Coastal Marshlands Protection Act
Shore Protection Act, and
Revocable License Program.

Agencies networked through memoranda of agreement are:

Department of Natural Resources (Divisions of Environmental Protection, Wildlife
Resources, Parks and Historic Sites, Historic Preservation)
Secretary of State,
Jekyll Island Authority,
Georgia Port Authority,
Department of Transportation,
Georgia Forestry Commission,
Public Service Commission, and
Department of Community Affairs

The program manages impacts to activities which have reasonably foreseeable effects upon land use, water use, or natural resources of the coastal area. Activities subject to the management program are:

development and manufacturing; transportation facilities; agriculture; silviculture;
recreation and tourism; marine related facilities; public service facilities; fisheries,
aquaculture and wildlife; and dredging

The GCMP also has a role in managing shoreline erosion and planning for hazard mitigation; encouraging public and local government involvement in the management of coastal resources; energy facility and shorefront access planning; protecting the national interest and ensuring that uses of regional benefit are not excluded; and management of special areas.

V. REVIEW FINDINGS, ACCOMPLISHMENTS AND RECOMMENDATIONS

The evaluation team met with GCMP partners: representatives of federal and state agencies, non-profit organizations, local governments, and universities, as well as private citizens. The team discussed the Coastal Program's efforts to address the issues identified in Section II of this report as well as concerns of the public in the implementation and enforcement of the States' approved coastal management program.

During this review period from May 2001 through November 2005 the GCMP had many significant accomplishments directly attributable to the actions of the core staff members. In addition to the accomplishments listed below, NOAA commends the State of Georgia on the progress made during the evaluation period in managing and developing partnerships, addressing impacts to its coastal resources, and providing opportunities for input from and consideration of the needs of local government decisionmakers. Listed below are program accomplishments as well as suggestions for improving program performance.

I. GCMP Operations & Administration

The GCMP is organized around the following general areas of activity:

- Program administration, technical assistance, and agency coordination
- Public information, education, and outreach
- Project review and compliance assurance
- Coastal Non-point Pollution Program, CZMA Section 6217 as amended, and
- The Coastal Incentive Grant (CIG) Program

A. Continued Establishment and Maturation of Program.

The program is commended for its management and direction of staff during the review period to balance out Program needs despite considerable turn-over in most key positions associated with program management. The GCMP staff have developed or recruited significant professional experience since the last evaluation through a range of activities and experience in the national program as well as in local and regional efforts. Staff was repeatedly commended for their knowledge, professionalism, and accessibility to their constituents by local, State, and Federal partners, and the research community.

GCMP representatives attend meetings and public events to improve awareness of program resources and opportunities for collaboration. They engage their partners in relevant projects that are responsive to the needs of local communities, special interest groups, and regional, State, interstate, and Federal agencies.

The evaluation team heard from GCMP partners that when a need is identified, the solution can easily be reached through contact with the Program. Program staff provides frequent

opportunities for information exchange through providing a local presence and involvement in the common goals of balancing resource protection with economic development.

The GCMP receives State-based financial support for many positions, including most supervisory positions, and has added three State-funded permit positions since the last evaluation.

The GCMP has managed staff effectively, to capitalize on individual skills and experience to reach Program objectives. Since the last program evaluation there has been significant turnover in staff involving just about all the key positions. The new administration brought changes in DNR leadership as well. Throughout these changes, positions have evolved to fill management and leadership needs and to provide new professional opportunities for key staff. Program leadership is well-positioned and brings relevant experience and technical expertise, coming from other state coastal programs participating in the national CZMP.

The efforts and commitment of GCMP staff have resulted in specific, measurable examples of contributions in many relevant projects working toward a consistent approach towards sustainable growth and resource preservation. The accomplishments that include projects and activities not only consider the interests of their partners; they are building on to a base of information and coastal information tools.

Accomplishment: NOAA commends the GCMP for its efforts in developing a well-balanced program and in identifying key positions and moving resources to address newly developing Program areas.

B. Local Government Technical Assistance

The team heard from coastal program partners how GCMP staff communicates well to coastal communities, provides contacts for technical assistance, and acts as a liaison to the GCMP on CIG opportunities and local planning and projects. CIG funds were used to increase availability and accessibility of land use data for local planning priorities. Partnerships provided further funding and acquisition of data and tools.

GCMP local technical assistance staff regularly attends stakeholder meetings to present information on the Program and activities affecting coastal planning and project issues. Staff regularly provides presentations to planning official on topics such as smart growth, low impact development, permitting, and current natural resource issues.

Open Marsh Water Management (OMWM) workshops were conducted for state and federal agency officials, mosquito control personnel, stakeholders, and citizens in the spring of 2004 to investigate the applicability of the OMWM mosquito control technique in the six coastal counties. OMWM is an ecosystem approach that includes habitat enhancement and reduced pesticide use in integrated mosquito management. Respondents recommended a pilot project and formation of an advisory group to guide the project and determine its impacts.

GCMP staff worked with local officials to increase public access to beaches in Glynn County on Saint Simons Island and the City of Tybee Island through upgrading access points and a focus on provision of handicapped access on Tybee Island. Staff regularly attended City Council and Beach Task Force meetings at Tybee Island where they provide assistance with specific projects to ensure compliance with environmental regulations. CZMA Section 309 funds were used to develop beach and shoreline management practices incorporated in a beach management plan as part of a comprehensive planning effort.

Alternatives to Development was a collaborative project of the GCMP, the NOAA Coastal Services Center (CSC), the Sapelo Island NERR, the Georgia Conservancy, the Georgia Department of Community Affairs, and the City of St. Mary's. The project resulted in data on natural resource use and economic development information as well as planning tools to be used when considering growth and development. The project also identified examples of good developments along the coast.

Accomplishment: The GCMP's provision of technical assistance has brought recognition for the value of the Program and its staff in supporting successful local community projects that encourage further coordination and planning.

Georgia is experiencing unprecedented growth in its coastal area that is significantly impacting its resources such as public access, water quality, habitat, marshland, and beaches. These impacts will be discussed further elsewhere in this document. The evaluation team participated in numerous discussions regarding the impacts of the rapid increase of development in the Georgia coastal zone and its implications for local communities' natural and financial resources. Residential and commercial developments are attractive to elected officials who view increases in the tax base favorably, but these developments are costing communities money in terms of providing infrastructure and services as well as in contributing to the loss of coastal resources that brought people to the coast in the first place. In most of the coastal counties except Chatham and Glynn, there is little planning capacity and the municipal structure is nominal – in many cases there is little more than an elected board of commissioners and a staff person or two to support planning and zoning activities. Further, turnover among staff tends to be high. These communities do not have the means to put together and implement multi-year project proposals for such needed planning tools as master plans or zoning ordinances. As a result, local governments have difficulties participating in the CIG, even though they are a focus area for funding. Developing quality applications for increasingly competitive CIG funding, meeting the matching requirements, and adhering to award time schedules are all challenges these communities face. GCMP technical assistance staff help as they can, however, but with funding to support only two positions (and one is vacant with the internal promotion of the staff person), this is currently an under-resourced function of the GCMP.

1) Program Suggestion: Local elected and appointed officials obviously are in need of additional resources and tools to support decision-making that affects coastal resources. The GCMP and CAC should consider how to best support local governments through the GCMP technical assistance function and the CIG Program, such as by finding the means to increase the number of GCMP technical

assistance staff; continuing to support and promote resources and programs such as the “Alternatives for Coastal Development” project with CSC, the Green Growth Guidelines, NEMO, and other outreach and education; or providing more formal assistance to local planning efforts.

C. Sunset Legislation

During the 2003 legislative session of the Georgia general assembly, House Bill 157 was introduced to reauthorize the enabling legislation that creates the authority of the GCMP, the Coastal Management Act (CMA). The CMA was reauthorized by the Georgia legislature, extending the sunset provision another five years until 2008. The legislation provides: operational Federal consistency provisions and equal legal status with its border coastal states of Alabama, Florida, and South Carolina; a program to simplify the State permitting process; more coordination among local, state, and Federal agencies; and funding for planning, research and other projects through the CIG Program. Successful reauthorization speaks well to the support the GCMP has garnered for its programs and authorities. However, the State may face a new challenge in support for continued authorization of the CMA.

During the evaluation period, the GCMP strengthened implementation of its regulatory program in response to increased development and impacts along Georgia’s relatively undeveloped coast. The Program dedicated effort and staff resources to this program, resulting in better understanding by the regulated community of permitting requirements, increased public participation in the permitting process, and greater consistency by staff in their review of applications and recommendations on permits when based on interpretation of legislative authorities. These activities will be discussed elsewhere in this document.

To the GCMP’s partners and the public, the time and effort spent clarifying the permitting process as well as increased litigation over permit decisions, is leading to the increased perception that the GCMP is mostly a regulatory program. This overshadows the other important functions that the GCMP performs, such as technical assistance, education, and research, activities upon which support for the initial adoption and subsequent reauthorization of the GCMP was based. Program functions and activities that reach local constituencies potentially have far-reaching impact to reverse the perception of the program as only regulatory, and provide an alternative perspective to those who have influence on extending the sunset provision. The evaluation team discussed actions such as developing a key coastal issue to highlight the strengths and purpose of the GCMP, additional outreach activities such as reports to the legislature, and securing a “champion” for the GCMP as potential ways to change the current perceptions of the program. NOAA suggests that the GCMP work with its partners and the CAC to consider these or other efforts as solutions for changing the perception of the public and securing support in the legislature for extending the 2008 sunset provision of the CMA.

2) Program Suggestion: In response to increased development and impacts along Georgia’s relatively undeveloped coast, permit activities have occurred which highlight the importance of the established regulatory program which complements other coastal management activities. As the deadline for the CMA sunset provision

approaches, the State should develop a strategy whereby they can garner support for continued implementation of the GCMP through reauthorization of the CMA. The GCMP should address the public perception of it being primarily a regulatory program by highlighting the full range of benefits that accrue through GCMP implementation.

D. Coastal Advisory Council (CAC)

The GCMP formally reconstituted a Coastal Advisory Committee (CAC) during the evaluation period. A Coastal Zone Advisory Committee was appointed in 1992 to support Program development. Following Program approval, a CAC was appointed to assist the State in Program implementation. Participation on the CAC diminished through time. However, it continued to meet to assist the GCMP on developing annual funding themes for the CIG Program. In 2003, a steering committee recommended a new membership structure and function for the CAC. These recommendations became the basis for the creation of a new Coastal Advisory Council by the DNR Commissioner on October 1, 2003. The newly formed CAC adopted by-laws under which the CAC now operates. The by-laws also provide for the organization of three committees: Coastal Advisory Council Management Committee; Education and Outreach Committee, and Coastal Incentive Grant Committee.

The CAC is a large group of 50-60 members that meets quarterly to represent coastal counties and cities, regional councils of government, state agencies and coastal interest groups. Several current members of the CAC served on the initial Coastal Advisory Committee that was appointed by the Governor in 1992 and assisted with the development of the GCMP. GCMP provides staff support to the CAC that includes: the organization and conducting of quarterly meetings, meeting summaries, communication with Council subcommittees, and maintenance of the membership roster.

Accomplishment: The GCMP is commended on the reconstitution of the CAC. The staff support given to the CAC reflects the dedication and leadership of the State to its partnership at the local, state, and federal level in management of coastal resources.

During the site visit, the evaluation team met with key CAC leadership and the CIG subcommittee; attended one of the CAC quarterly meetings; and also heard about the CAC from members during the public meeting and other meetings where we met with members who partner with the GCMP. According to those interviewed, there is still some debate about the roles the CAC should serve and what activities are appropriate to support the CAC in these roles. For example, some individuals would like to see the CAC provide input and comment on the direction and long term development goals of the program and for program revisions, as well as to provide assistance in conflict resolution. Others feel that the current CAC is too large to do little more than facilitate information exchange. In the meantime, the structure, organization, and activities of the CAC continue to evolve through an on-going process, with various details still under discussion and many decisions still to be made.

3) Program Suggestion: The GCMP and CAC are encouraged to continue evaluating and clarifying the role that the CAC should play in most effectively supporting Program implementation.

E. Effective Use of Federal Dollars

During the development of the GCMP, it became practice to allocate a majority portion (60%) of CZMA Section 306 funds through the CIG Program, leaving the remaining 40% for supporting program staff and operating costs. This split of the Section 306 funds is not required in a formal sense by the GCMP, but it nevertheless is treated as a policy of sorts at this point. Currently, the total federal funding for Section 306 that the State can expect each year is capped at about \$2 million. During the evaluation period, this funding level was constant and it actually declined in 2005, overall decreasing the Grant's real value and creating a scenario whereby the CRD is not receiving the resources it needs to run the Program, and thereby affecting implementation of the Core Program.

In addition, identification of funding themes used in the selection of projects to be funded by the CIG Program is primarily the purview of the CAC. Although GCMP staff have had some limited success in recent years in having specific program priorities or research needs included as CIG funding themes (such as projects that would help the state meet conditions on its coastal non-point pollution control program), and have an advisory role in the project review and selection process, ultimately the distribution of the CIG funds is largely out of the GCMP's control. This responsibility falls to a Technical Review Committee. CAC involvement in the CIG process is important, as it provides outside perspective into local issues and needs, and helps maintain support for and buy-in to the GCMP, among other reasons. As such, that involvement should remain. However, it is also appropriate for the GCMP to have more control over the allocation of at least some of the CIG funds. This would give the GCMP some ability to identify its own themes or research needs as well as directly select the projects that it feels best meets its needs. This approach might also alleviate some of the pressure created by the funding split noted above (as well as serve as a compromise) by giving the GCMP access to program funding above the 40% level that can be targeted for special projects or research of its choosing, while still leaving the funds in the CIG arena to be awarded to program partners.

3) Program Suggestion: The 40/60 split should be re-evaluated and potentially modified in light of level or declining federal resources. The CZMA requires priority use of the federal funds to ensure adequate staff and program operations necessary to manage increasing coastal development pressures, before funding discretionary activities like the CIG Program. In addition, a portion of the CIG funds should be targeted to directly support the research needs of CRD. These funds would remain as part of the CIG Program, but would be dedicated solely to supporting the research or other needs of CRD with CRD setting the themes or specifying the research projects as well as choosing the projects that get funding.

F. Coordination

GCMP staff work well with the program partners in implementing the approved Program. Throughout the week the evaluation team repeatedly heard positive comments on the relationships that different entities have with CRD staff. Relationships were described as “seamless” and “long-standing.”

GCMP staff participates in regular coordination with a number of Federal, State and local agencies to discuss issues related to proposed permitting projects and to suggest techniques to minimize potential impacts. Technical assistance staff regularly represent the GCMP at meetings to present reports, promote the CIG Program, and/or coordinate on project-specific issues with partners such as: Regional Development Centers (quarterly); state Soil and Water Conservation Districts (monthly); NRCS/RC&D Districts, GA Department of Transportation, GA Emergency Management Agency, GA Department of Community Affairs, US Fish and Wildlife, and US Army Corps of Engineers (the Corps).

The GCMP hosted the 2004 Southern and Gulf Region Coastal Program Managers’ Meeting at Jekyll Island. Topics included: CELCP Planning and Prioritization, National Coastal Management Performance Measurement System, projects and activities of NOAA OCRM and the Coastal Services Center, and coastal environmental issues. They continue to attend these meetings as well as the National Program Managers’ Meeting in Washington, DC and the associated Coastal States Organization Meeting.

The DNR Ecological Services Section’s Habitat Management Program coordinates with the Corps’ Regulatory Branch on water quality certifications and permits for dredging and beach nourishment. Corps staff expressed appreciation for the availability of staff and involvement in interagency issues. GCMP staff participates in quarterly inter-agency meetings to discuss policies and procedures for permits regulated under the federal consistency provisions of the CZMA. During the evaluation period, the state programmatic general permit for private recreational docks was renegotiated, and an MOU was negotiated between GA DNR and the Corps for carrying out HB 727, which establishes a policy for beneficial uses of dredged material in maintaining Georgia’s beaches. The GCMP played a key role in this effort.

The evaluation team visited with the GCMP partner in the National Estuarine Research Reserve System (NERRS), also administered by NOAA, Sapelo Island NERR (SINERR). The GCMP and SINERR coordinate well and have successfully partnered on several projects during the evaluation period including studying the marsh die-off syndrome, mapping on-site septic systems in McIntosh County using GIS, and using Open Marsh Water Management for mosquito control. The SINERR is a good liaison to local governments, and helps support management needs for science in decisionmaking.

Accomplishment: The GCMP coordinates well with their partners in local, state, and Federal agencies, non-profit organizations, and the general public in Program implementation.

G. Outreach

The GCMP has continued to implement or initiated several outreach and education activities that make use of the available resources of the program and its partners. Accomplishments during the review period include:

Continued publication of the quarterly newsletter, *The Georgia Sound*, which is produced by GCMP staff and is intended to educate and inform the public about coastal issues and GCMP activities, as well as marine fisheries projects, and coastal environmental issues.

DNR bi-monthly brown bag lunches, which were initiated to promote inter-organization communications, now include programs to inform the public on coastal resource issues and GCMP activities.

News releases concerning GCMP issues, projects, programs, and activities, which are distributed to media sources.

Continued use of the Coastal Ark, a mobile classroom used as a training resource for local elected officials, planners, zoning boards, and building inspectors and promote natural resource protection through education, planning, and cooperation. The Coastal Ark is also used for activities aimed at grade school children and the general public.

The GCMP has continued the CoastFest event, with 2005 representing its 10th annual environmental celebration. It provides over 90 interactive and educational exhibitors and activity areas to learn about and celebrate Georgia's coastal natural resources.

Accomplishment: The GCMP continued to provide high-quality, relevant educational programming and increase efforts to improve communication and provide information on coastal program issues to GCMP partners, coastal decision-makers, and the public.

H. The Georgia Coastal Non-point Source Pollution Control Program

The GCMP received conditional approval for its federally mandated Coastal Non-point Source Pollution Control Plan (CNPCP) in 2002, during the last evaluation period. With outstanding areas for refinement largely focused on non-point sources from agriculture, urban and hydromodification, the Coastal Program has drawn upon a coalition of partners to develop a coordinated approach to gaining full program approval. Funding from both the CIG and US EPA's 319(h) Grants Programs are being used to address these conditions. In its 2003/04 funding cycle, the CAC supported the GCMP's request to include a CIG funding theme for projects that would help the GCMP meet conditions on and earn full approval for its CNPCP. Further, the CNPCP Coordinator was successful in working with DNR's Environmental Protection Division and US EPA Region IV to assure that a portion of the US EPA 319(h) grant monies were accessible for coastal non-point source program development needs.

This coalition of NPS stakeholders includes the DNR Environmental Protection Division and water quality experts in industry, research and education partners, and local governments. Georgia's management responsibilities for the Coastal NPS Program play a critical role in preventing and reducing polluted runoff to the coastal waters being increasingly affected by conversion of land to development. The Coastal Program is helping to ensure that local governments have the tools necessary to address polluted runoff through the CIG, educational programs, and technical assistance to support better local decisionmaking by improvements to land use planning and zoning to protect water quality.

Accomplishment: The State is commended on working proactively to address non-point source pollution, while still working to achieve full program approval of its CNPCP.

I. Implementation of the CELCP

GCMP staff developed and submitted a draft Coastal and Estuarine Land Conservation Program (CECLP) plan according to NOAA guidelines. The plan strives to build upon existing conservation efforts in Georgia and partners with entities engaged in land conservation.

The CELCP provides state and municipal governments with federal funds to protect coastal and estuarine lands considered important for their ecological, conservation, historical, recreational, and aesthetic values. Georgia has proposed that lands within the 11-county coastal zone would be eligible for acquisition including habitats such as: marsh hammocks, Carolina Bays, tidal marshes, lands adjacent to river corridors, areas of historic or cultural significance, land adjacent to state parks or historic sites, coastal maritime forests, hardwood bottomlands, and longleaf pine forests.

Accomplishment: The GCMP is commended for its preparation of and participation in CELCP with its development of a draft CELCP plan.

II. Coastal Incentive Grants

A. Improvements to the CIG Program

The CIG Program, which as noted above receives about 60% or \$1.2M annually from the GCMP's Section 306 allocation, continued to have a significant impact during the review period. Many GCMP constituents and partners repeatedly commented on the importance of this program and expressed support for its continuance. In terms of the types of projects supported, during the review period, 57% of the available funding was directed to universities (mostly for research, but also for some education activities), 29% was directed to local governments, and 14% was directed to other state agencies. Most of the projects funded were research or planning. The NOAA evaluation team also met with the CAC's CIG subcommittee to talk about this program and the CAC's role, and particularly to discuss steps taken by the subcommittee (and the GCMP) to improve the effectiveness and performance of the CIG Program.

The CIG Committee worked to define a process for selecting annual funding themes for the CIG Program, as well as establish better selection criteria that would more closely align projects with the GCMP objectives and goals, resulting in a more defined link between the CIG to the GCMP. They also took steps to ensure that the performance of grantees would be monitored more closely and that projects would be completed on time and as proposed. Consequently, the CIG Program now has a greater likelihood of ensuring that quality projects are selected in each grant cycle that tie back into GCMP goals; and that selected projects are completed on time and meet all the terms of the award contract.

Current CIG program policy allows for applicants to request funding for multi-year projects up to three funding cycles in length, although this practice was debated during the review period. Typically it is the research community that seeks to take advantage of this provision. Research projects that meet a funding theme can receive up to \$100,000 per year for three years. (This is in contrast to local need-based projects, which can receive only up to \$25,000 for one year.) As a result, the amount of funding that is actually available for new projects in any given year can be substantially less than the \$1.2M allocated for this Program. This practice was not monitored that closely and in the FY06-07 funding cycle, it was discovered that only about \$300,000 was free for the competition, with the balance tied up in multi-year projects. The CIG Committee took action to limit re-occurrence of this by establishing a new policy that will allow no more than 50% of annual CIG funding to be committed to multi-year projects, but it will take 2 years to relieve current obligations. Exacerbating the problem, the number and quality of CIG applications for projects have increased, making remaining funds even more competitive. It is estimated that the CIG can fund only about half the projects proposed.

Accomplishment: During the evaluation period, the CIG Program has continued to have significant impacts on and provide benefits to GCMP constituents in the coastal zone. At the local, state, and national levels, the GCMP has formed strong partnerships and gained the trust of local governments, resulting in a multitude of successful coastal projects. Many parties that the evaluation team met with repeatedly cited the importance of these grants in supporting research activities, planning studies, local ordinance development; many of which wouldn't occur without CZM funding.

B. Research

The GCMP has good relationships with the local research community, which assists the GCMP by providing science and some education programs needed by CRD for coastal management. During the award period the Georgia Coastal Research Council (GCRC) was created to help link science to management in Georgia by providing coastal science to state and local decision-makers. The evaluation team heard that when GCMP staff needs data on which to base a Program initiative or policy, they have a resource to turn to in the GCRC. The scientific community takes advantage of funding available through the CIG Program to broaden baseline data and develop predictive models in order to support the development of policies that will preserve natural resources, save lives, and maximize opportunities for sustainable development. Partners include: The University

of Georgia (UGA), Skidaway Institute of Oceanography (SKIO), Georgia Institute of Technology, Georgia Southern University, and Savannah State University.

The GCRC provided leadership to scientists collaborating on an integrated research approach to assessing the marsh die off, which occurred starting in 2001 following three years of drought along high salinity marsh areas. The result has been the development of a standard monitoring protocol to be used to assess Georgia's marsh die back phenomena. A workshop was held in collaboration with researchers from Louisiana to exchange information and address common issues. Following the workshop, DNR moderated a public information meeting that 80 people attended.

The Skidaway Institute of Oceanography study of docks and piers describes the effects of docks extending across the marsh, their effects on the marsh ecosystem, and includes baseline and trend data in dock construction. These data provide comprehensive information and were used by the CRD stakeholder group to present options to foster better resource-related decision-making based upon knowledge and scientific data.

The NOAA Coastal Services Center was the source of data provided for the UGA and Georgia Conservancy project, *Visualizing Past and Potential Impacts of Land Use Changes on the Georgia Coast*. This project resulted in information regarding alternatives to traditional land development patterns relevant to coastal counties and tools to visualize these different types of development scenarios. Workshops were held to educate local governments about these tools.

Savannah State University's Adopt a Stream (AAS) Program activities promote water quality awareness and education through volunteer citizen and group involvement in monitoring local environmental conditions. The AAS Program is presented at educational forums, and representatives serve as a technical and educational resource for coastal issues and planning.

Work is being done at UGA's Marine Extension Service (MAREX) to develop and promote a wetland monitoring program to collect and enhance data through comprehensive monitoring. MAREX developed a database to house all known water quality data for the region at one location.

It is clear that the research community provides assistance to and benefits for the GCMP, on a variety of fronts. The CAC's efforts to improve the CIG process have affected the research arena, with greater consideration of the research needs of the GCMP and local coastal communities and the selection of priority projects. Nevertheless, the CAC should consider a greater emphasis in the CIG Program on projects involving applied research, as opposed to empirical research. Applied research is more likely to have immediate implications and result in recommendations for actions and decision-making that would preserve better coastal resources and result in appropriate resource use and protection. Such projects would better support the needs of the GCMP.

Accomplishment: The GCMP and the CAC are commended on their progress towards ensuring that CIG funded research supports GCMP needs and its use of

partnerships with the research community to obtain and better integrate science in coastal decision-making.

III. Impacts to Coastal Resources

There are a number of resource management challenges faced by the GCMP including: growth and development in the coastal area; loss of traditional public access and available land for new access; proliferation of community and public docks and marinas; available freshwater supply; and development of marsh hammocks. Although no program suggestions or necessary actions on this topic are provided in this evaluation, these issues are a growing problem for the GCMP and should be monitored during the review period and in the next evaluation to see if further action is warranted.

Growth in the Coastal Area

Georgia's rapid growth in the coastal area has the public increasingly concerned over the impacts to coastal resources. During the last four years, the number of locations suitable for development has declined due to several factors. As development occurs, the amount of developable land decreases and existing land may be subject to impacts of erosion or coastal storms. In addition, developments including homes, large communities, or docks have become more complex in size and configuration. At the time of the site visit, the GCMP was involved in appeals over eleven permit decisions. Some of these appeals were brought by third parties seeking to have the GCMP use the development permit process for the Coastal Marshland Protection Act as a tool to manage impacts to uplands adjacent to the marshes. There is definitely interest or concern from multiple fronts about expansion of the reach of the authority provided by the Marsh Act. The development community voiced concern that many Marsh Act permit conditions really address impacts to uplands. All sides agree that Georgia does not really have good state or local laws (consistently) that provide criteria for the management of impacts from development on upland areas. This issue is likely to get resolved in the court system, if the state does not resolve it through legislation.

The Coastal Marshlands Protection Committee and the Shore Protection Committee were established by law and have direct regulatory authority over the marshlands and shore area identified by the state statutes. The Committees are chaired by the DNR commissioner and conduct public hearings on the review of substantial projects, those subject to conditions of Coastal Marshland Protection Act permits and Shore Protection Act permits.

The Habitat Management Program provides for the Committees: a review of each permit application under consideration, decision documents, and supporting display materials upon which to develop findings and recommendations. Due to the increases in the number of permit applications and in the complexity of the process, there has been an increase in resources expended to ensure consistency in the application process: in ensuring consistent timing and reference to the enforceable authority.

The Program has: developed relationships with stakeholders, provided information on current Program issues, been accessible in the in pre-application stage of the permitting process to determine the jurisdiction of the Coastal Marshlands and Shore Protection Acts, evaluated proposed projects, checked the permitted project footprint prior to construction, and inspected sites for compliance with issued permits or the Acts. As development and projects become more complex, staff resources are increasingly needed to ensure coordination and effective processes. The GCMP needs to continue to evaluate the jurisdiction of its authorities to ensure that development impacts are managed, but not in such a way that results in increased litigation.

Public Access

There is growing concern regarding loss of public access, especially at the local levels. Coastal Georgia historically provides a lot of public access to beaches, though of the State's approximately 118 miles of sandy oceanfront and estuarine beaches, about 19 miles have easy public access. Many of Georgia's beaches are located on its barrier islands. However, of the 14 barrier islands, just four are accessible by road, of which three are easily accessible to the public (Tybee, St. Simons and Jekyll Islands). And, while there is considerable beach access on those islands, the majority of the remaining barrier islands are held in conservation by State or Federal agencies and access is, therefore, limited. Opportunities for new access sites are being lost, though, as upland development adjacent to beaches increases. Loss of public access to coastal rivers and waterways is, similarly, being restricted as uplands adjacent to community and public docks and marinas are developed or redeveloped, and the existing infrastructure is converted to private uses. In response to the growing concern about adequate public access, the GCMP does have some access-related projects underway, such as developing an inventory of public access sites to assess extent and trends in availability and to help assess whether management action is needed. In addition, the GCMP is participating in land conservation programs; working with local communities to improve public access through the CIG program; and providing technical assistance.

Community and Public Docks and Marinas

During the evaluation period, there was growing concern about the proliferation of docks in coastal Georgia and what impacts they might be having on marsh ecosystems, such as whether they contributed to the marsh die-off syndrome. CRD staff gathered data on public boating access in Georgia: the size and distribution of public marinas, the average number and sizes of community docks permitted over the past five years, and neighboring states' policies on the regulation of community and private docks. This information was presented to the Coastal Marshlands Protection Committee, which recommended initiation of a stakeholder process for collaboration on the issues of docks, marinas, and community docks. Issues to address include: size of structure, guidelines for dock corridors, length of walkways spanning marshlands, length of walkways spanning waterways, and construction techniques.

Freshwater Supply

The availability of sustainable long-term supplies of groundwater is impacted by the rapid rate of development in coastal Georgia. Because of its unique hydrological factors and a lack of historical study, coastal Georgia has little baseline or trend data regarding water quantity and quality data. This makes it difficult to develop predictive models that would help ensure the balance of freshwater resource protection and sustainable economic development. Groundwater resources are also being impacted by saltwater intrusion in the upper Floridian aquifer, due to the steady increase of the volume of groundwater pumped to meet increased demands for use.

Coastal Georgia's five major river systems, which flow from inland areas to the coast, are also heavily impacted by upstream communities drawing water. Altered freshwater inflow can reduce the volume of water reaching Georgia's estuaries, which may affect coastal resources including fisheries, and tidal marshes and other coastal habitats. In addition, over 60% of the State's land area drains to the coast, which has implications for the quality of this inflow.

Freshwater supply was a funding theme in several CIG cycles during the evaluation period, and a number of research projects were funded to help model flow in various river systems and develop standard tools for doing so. Availability of freshwater supply could have impacts for the ability of coastal communities to develop in the future as well as create a need to manage impacts to natural coastal resources caused by declining freshwater levels.

Marsh Hammocks

The growing scarcity of developable lands in coastal Georgia has led to the trend of increasing development of marsh hammocks. Hammocks are areas of higher elevation that are surrounded by marshlands. They vary in size from less than an acre to many acres, and when proximate to mainland and large enough to support houses, they can become targeted for development. This causes problems including the need to construct bridges or causeways for access from the mainland to the islands, which must go across the marshes that are state-owned, creating public trust issues, access issues and physical impact the marshes. The hammocks themselves also are ecologically important habitats for wildlife. In response to the public's growing concern for these important land areas and the impact on ecosystems, wildlife habitats, fishery industry, shoreline protection, and water quality, in 2001 and 2003 CRD conducted a stakeholder process with a variety of interested parties, including environmental organizations and the development community, to try to address these issues. The DNR appointed the advisory council and developed a study to identify the ecological importance of marsh islands, promote mitigation of development impacts and surrounding marsh ecosystems, and discuss policy issues related to the development of marsh hammocks. The final report of the Coastal Marsh Hammocks Stakeholders Dialogue, *Facilitating Human Dimensions Research on the Future Management of Coastal Marsh Hammock Development* contains recommendations on how to manage marsh hammock ecosystems. These recommendations were presented to the Coastal Marshland Protection Committee, the Board of DNR's coastal committee and the public. While no

regulatory or statutory changes have been made, several recommendations have been implemented whenever possible through the permitting component of the GCMP, as well as low impact development principles promoted through education and outreach and technical assistance.

VI. CONCLUSION

Based on OCRM's review of the federally approved Georgia Coastal Management Program and the criteria at 15 CFR 928.5(a)(3), I find that the State of Georgia is adhering to its federally approved coastal management program. Further advances in coastal management program implementation will occur as the State addresses the program suggestions contained herein.

These evaluation findings contain four recommendations that are program suggestions that the State should consider before the next regularly scheduled program evaluation and which are not mandatory at this time.

This is a programmatic evaluation of the GCMP that may have implications regarding the State's financial assistance award(s). However, it does not make any judgment about or replace any financial audit(s) related to the allocability of any costs incurred.

David M. Kennedy, Director
Office of Ocean and Coastal Resource
Management

Date

VII. APPENDICES

APPENDIX A. PERSONS AND INSTITUTIONS CONTACTED

Georgia Department of Natural Resources, Ecological Services

Name	Title	Affiliation
Susan Shipman	Director	Coastal Resources Division
Brad Gane	Asst. Director	Ecological Services Section
Patrick Banks	Program Manager	EES - Habitat Management Program
Dominic Guadagnoli	Technical Assistant	EES - Operations Program
Brooks Good	Technical Assistant	Operations Program
Jill Huntington	Technical Assistant & Acting Operations Manager	Operations Program
Jan Mackinnon	Technical Assistant	Operations Program
Jennifer Kline	Outreach	Operations Program
Marci DeSart	Grants Management	Operations Program
Ann Thran	Permit Coordinator	Habitat Management Program
Karl Burgess	Permit Coordinator	Habitat Management Program
Kelie Moore	Federal Consistency	Habitat Management Program
Rhonda Knight	Permit Coordinator	Habitat Management Program
Deb Barreiro	Permit Coordinator	Habitat Management Program
Christina Hodge	Permit Coordinator	Habitat Management Program

Representatives of Local Interests and NGOs

Name	Title	Affiliation
George Miners	Vice President, Development	Land Resources Companies
Wood Woodside	President	Brunswick, Golden Isles Chamber of Commerce
Patty McIntosh	Coastal Programs Director	The Georgia Conservancy
Christi Lambert	SE GA Conservation Director	The Nature Conservancy
David Kyler	Executive Director	Center for a Sustainable Coast
James Holland	Riverkeeper	Altamaha Riverkeepers, Inc.
Gordon Rogers	Riverkeeper	Satilla Riverkeepers

Coastal Advisory Council Members

Name	Title	Affiliation
Denise Grabowski	Chair	Citizen-at-Large
Billy Edwards	City Manager, Vice Chair	City of Hinesville
John Butler	Past Chair	City of Pembroke
David Bluestein	Mayor	City of Darien
Faren Sanders Crews		Citizen-at-Large

Michael Melton	City Administrator	City of Richmond Hill
Mickey Whittington		Wayne County
David Kyler	Executive Director	Center for a Sustainable Coast
Paul Wolff	(Attending – Not a Member)	City of Tybee Island
Dr. Marc Frischer		Skidaway Institute of Oceanography
Dr. Steve Vives		Georgia Southern University
Rowe Bowen		Georgia Department of Transportation
Willard Fell		Georgia Forestry Commission
Dr. Randal Walker		University of Georgia MAREX
Katie Alvarado	(Attending – Not a Member)	University of Georgia MAREX
Sheridan Reed		Citizen at Large
Keith Gates		University of Georgia MAREX
Frank Mirasola	(Attending – Not a Member)	Jekyll Island
Phillip Flournoy	(Attending – Not a Member)	University of Georgia MAREX
James Holland	Riverkeeper	Altamaha Riverkeepers, Inc.
Dr. Eugene Keferi		Coastal Georgia Community College
Hope Moorner	Program Manager	Georgia Ports Authority
Sarah Brockenbrough	Regional Representative	Georgia Department of Community Affairs
Michelle Puliese		St. Simons Land Trust
Mindi Morrall		Citizen At Large
Christi Lambert	SE GA Conservation Director	The Nature Conservancy
Herb Shaw	Mayor	Mayor of Jessup
Don White		Coastal Georgia RC&D Council
Patty McIntosh	Coastal Programs Director	The Georgia Conservancy
Paul Brockington		Citizen At Large
Diana Haster	(Attending – Not a Member)	Citizen At Large
Hal Kraft		Citizen At Large
Lucille Brock-Thomas		Town of Screven
Ben Brewton		Bryan County

Tybee Beach Task Force

Name	Title	Affiliation
Freda Rutherford		Tybee Beach Task Force
Lou Off		Tybee Beach Task Force
Paul Wolff		Tybee Beach Task Force
Dee Anderson	Assistant City Manager	Tybee Beach Task Force
Wright Powers		City Council, Tybee Beach Task Force
Wick Searcy		Tybee Beach Task Force
Berta Adams		Tybee Beach Task Force

Walter Parker	Mayor	Tybee Beach Task Force
Bonnie Gaster	Realtor	Tybee Beach Task Force
Dick Magune		Tybee Beach Task Force

Savannah District Army Corps of Engineers (ACOE)

Name	Title	Affiliation
Carol Bernstein	Chief, Southern Section	CESAS-OP-FS
Richard Morgan	Team Leader	CESAS-OP-FS
Jeff King	Regulatory Specialist	CESAS-OP-FS
Joe Rivera	Regulatory Specialist	CESAS-OP-FS
Terry Kobs	Regulatory Specialist	CESAS-OP-FS
Roger Burke	Chief, Plan Formulation Branch	Mobile/Savannah Planning Center
Lyle Macicjewski	Planning Manager	Savannah Harbor ACOE
Daniel Parrott	Chief, Civil Programs and Project Management	ACOE
Susan Rees	Leader, Coastal Environment Team	Mobile/Savannah Planning Center
William Bailey	Physical Scientist	Mobile/Savannah Planning Center
Roger E Lafond, Jr.	Acting Chief	Navigation Management Branch, Operations Division

Georgia Ports Authority

Name	Title	Affiliation
Hope Moorer	Program Manager	Waterways Development

Researchers

Name	Title	Affiliation
Jim Reichard	Associate Professor	Georgia Southern University
Merryl Alber	Associate Professor	University of Georgia
Karen Payne	Public Service Associate	University of Georgia
Marc Frischer	Associate Professor	Skidaway Institute of Oceanography
Chandra Franklin	Professor	Savannah State University
Randal Walker		University of Georgia
Mac Rawson	Director	Georgia Sea Grant
Phil Flournoy	Research Coordinator	University of Georgia, MAREX

Local Governments

Name	Title	Affiliation
Shelley Stevens	Planner	SE GA RDC
Paul Wolff		City of Tybee Island
Katie Alvarado		University of Georgia MAREX
Jackie Jackson	Water Resources Planner	Metropolitan Planning Commission
Vernon Martin	Executive Director	Coastal Georgia RDC

Other State Agencies

Name	Title	Affiliation
Don White		NRCS/Coastal Georgia RC&D Council
David Ferrell	Assistant State Conservationist	USDA/NRCS
Jason Burns	Deputy State Archaeologist	GA DNR
Dan Hawthorne		Coastal Georgia SWCD
Spud Woodward	Assistant Director for Marine Fisheries	Coastal Resources Division, DNR
Brad Winn	Senior Wildlife Biologist	Wildlife Resources Division, DNR
Jeannie Butler	Coastal NPS Coordinator	Environmental Protection Division, DNR

Sapelo Island National Estuarine Research Reserve (SINERR)

Name	Title	Affiliation
Buddy Sullivan	Director	SINERR
Dorset Hurley	Research Coordinator	SINERR
Fred Hay	Island Manager	SINERR

APPENDIX B: PERSONS ATTENDING THE PUBLIC MEETING

Name	Affiliation
Lucille Brock-Thomas	Town of Screven
Hallie Meushaw	Troutman Sanders, LLP

APPENDIX C: NOAA'S RESPONSE TO WRITTEN COMMENTS

NOAA received two sets of written comments regarding the GCMP. Each comment is summarized below and followed by NOAA's response.

Sarah Brockenbrough
Regional Representative
Service Delivery Region Twelve
Georgia Department of Community Affairs
Savannah, Georgia

Comment: Ms. Brockenbrough writes to express DCA's appreciation of GCMP efforts in regional support of communities around the region and to acknowledge the role they played in designating Tybee Island as one of seven WaterFirst communities in the State; in providing technical assistance to Midway, and in Darien/McIntosh County, by continuing to guide the community through growth pressures by locating programs and services local officials and involved citizens can use for support. She states that Program staff is well-regarded and a constant presence in communities around the region.

NOAA Response: NOAA agrees that the GCMP engages communities in the region, and is doing an excellent job providing technical assistance to local officials that promote coastal planning. NOAA thanks Ms Brockenbrough for her comments.

Herb Shaw
Mayor, Jesup, Georgia

Comment: Mr. Shaw shares his perspective as a CAC member and Mayor of Jesup. Mr. Shaw feels that the make up of the CAC is designed in a manner that makes it ineffective as a council. For the following reasons he feels that the make-up of the council should be one that is functional: Its size causes meetings to be more of a forum; Issues surround the number of State agencies involved and their motive for participation, the size of membership, and members that monopolize with their own agenda.

NOAA Response: NOAA acknowledged in the findings that the GCMP and the CAC need to continue evaluating the appropriate functions of the CAC, which could include further consideration of how the group is structured. NOAA believes that these findings recognize the role of the CAC in Program development and implementation and the commitment of the GCMP to local governments to ensure representation in the GCMP. NOAA thanks Mr. Shaw for his comments.