

# Georgia Coastal and Estuarine Land Conservation Program

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## **I. Introduction**

### **The National Coastal and Estuarine Land Conservation Program**

The National Coastal and Estuarine Land Conservation Program (CELCP) was first created in Fiscal Year 2002 as a companion to the Coastal Zone Management Act for the purposes of helping to acquire coastal and estuarine lands, by fee title or easement, that are important for their ecological, conservation, recreational, historical or aesthetic value, and that can be effectively managed and protected. The Omnibus Public Land Management Act of 2009 then authorized Congress to appropriate up to \$60 million to CELCP annually. The program offers competitive funding for projects that ensure conservation of these areas in perpetuity for the benefit of future generations.

The National Oceanic and Atmospheric Administration (NOAA) administers the CELCP and establishes guidelines for a nationally-competitive grant program that include eligibility requirements and project selection criteria. Final guidelines appeared in the Federal Register on June 17, 2003. NOAA is in the process of updating the guidelines to reflect the 2009 reauthorization. Revised guidelines will also be published in the Federal Register.

### **The Georgia Coastal and Estuarine Land Conservation Program Plan**

The Georgia Coastal and Estuarine Land Conservation Program (GA CELCP) Plan was developed in cooperation with existing land protection efforts in the coastal region to allow the State to participate in the national Program as administered by NOAA. The GA CELCP Plan identifies conservation priorities for land acquisition that tailors the national program to the State's coastal conservation needs. Georgia's Plan also gives clear guidance for the nomination and selection of land conservation projects within the State's coastal boundary.

## **II. Geographic Extent of Georgia's Coastal and Estuarine Areas**

Georgia has 110 linear miles of ocean shoreline and nearly 3,400 miles of tidal estuarine and coastal shoreline stretching from the Savannah River to the north and the St. Marys River to the south. These areas are included within the boundaries of the State's approved Coastal Management Program, as described below, which also serves as the State's CELCP boundary:

### GA Coastal Management Program Boundary Extent

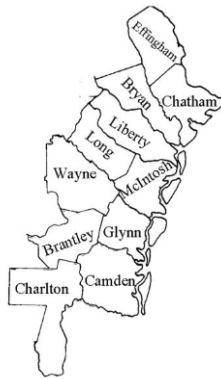
The boundary of the Georgia Coastal Management Program, which is also the GA CELCP area, is the political boundary of the eleven counties: Effingham, Chatham, Bryan, Liberty, Long, McIntosh, Wayne, Glynn, Brantley, Camden and Charlton. Encompassed within this boundary are all upland areas, all waters of the state, and all submerged lands within the defined coastal area extending seaward three nautical miles from mean low watermark.

### Areas Excluded from the Boundary

The jurisdiction of the Georgia Coastal Management Program does not include lands that are subject solely to the discretion of, or held in trust by, the federal government. Federal land areas are not subject to the direct management authority of the Coastal Management Program

and are generally exempt from State permits and other regulations. These areas are not eligible in Georgia's CELCP.

The Coastal Management Program defined area contains all of the tidally influenced coastal and estuarine waters of the State, except as excluded above, and encompasses the priority conservation values described below. All lands as described above that are located within this area shall be eligible for the Georgia CELCP (see Figure 1.)



*Figure 1. Geographic Extent of Georgia's Area for CELCP*

### **III. Coastal and Estuarine Land Conservation Priorities**

#### **Conservation Priorities**

The national CELCP was established by Congress to protect important coastal and estuarine areas that have significant conservation, recreation, ecological, historical, or aesthetic values. Priority is given to those lands that can be effectively managed and that will maintain significant ecological values. The conservation priorities described below serve to both augment and complement existing land protection efforts in coastal Georgia.

Uplands Adjacent to Key Riparian Resources - Georgia is home to nearly 350,000 acres of coastal marshlands that function as essential habitat and breeding grounds for several commercially and recreationally important fisheries as well as habitat for wildlife. Activity in the marshlands is regulated under the Coastal Marshlands Protection Act of 1970 and affords the marsh a level of protection from disturbance. Even though these important resources are afforded protection by the state's jurisdictional oversight, adjacent upland development can indirectly impact marsh health as well as interrupt the natural inland migration of these wetlands due to sea level rise.

Another significant resource in Georgia's estuaries is shellfish harvest areas. Five growing areas comprising 134,000 acres of tidal waterbottoms in Camden, Glynn, McIntosh, Liberty and Chatham counties have been identified by the State and approved by the Food and Drug Administration for recreational and commercial harvest of shellfish. The areas have pristine water quality, support an active fishery, and provide essential habitat for fish, crustaceans, invertebrates, and birds. Upland development poses a threat to both the economic and environmental benefits of these resources.

The GA CELCP Plan will prioritize projects that enhance protection of the state's marshland and shellfish resources by providing buffers to those areas.

Coastal Hammocks - Hundreds of inland marsh islands, called hammocks, rise from the marsh along Georgia's coast. These islands are comprised of uplands commonly dominated by live oak and palmetto and are usually surrounded by brackish water and/or salt marsh. Hammocks range in size from less than an acre to more than 20 acres. Surveys have shown that these islands contain critical habitat for the maintenance of biodiversity, especially for neo-tropical migrant birds and shorebirds. These islands are important roosting and nesting sites for the endangered wood stork and other large wading birds, nesting painted buntings, white-eyed vireos and yellow-throated warblers. Hammocks also provide nesting habitat for diamondback terrapins.

Freshwater Wetlands – Freshwater wetlands are vitally important to the ecosystem of coastal Georgia, which has extensive non-tidal and tidal riparian forested wetlands and marshes. Additionally, isolated inland wetlands, including cypress ponds, swamps, bogs, freshwater prairies, hillside seeps and depressional wetlands, such as Carolina Bays, exist in many areas of the state's southern coastal plain. The value of freshwater wetlands is well documented as they recharge the groundwater supply, filter storm water to improve water quality, provide flood control, offer habitat for fish and wildlife including rare species, and allow for recreation. Large acreages of coastal Georgia's wetlands have been drained to accommodate both silviculture and agriculture or have been drained or filled for development. Many remaining wetlands are significantly degraded or fragmented. Conversely, several large tracts of intact and ecologically functional freshwater wetlands also still exist in coastal Georgia. Encroachment and modification of natural water drainage patterns and processes upon freshwater wetlands leads to the loss of functionality and diminishes their value; therefore, the need for protection and conservation of these declining habitats is immediate.

Bottomland Forests – Bottomland forests, river swamp forests or floodplain forests as they are also called, were once extensive alongside the rivers of coastal Georgia. However, many of these forests have been converted into residential development or manipulated into alternative forest types (e.g., pine plantations). These forests have also been impacted by altered hydrologic conditions and the introduction of invasive species. Current bottomland forests are typically dominated by regenerated hardwoods such as bald cypress, black gum, overcup oak and swamp tupelo. Bottomland forests provide tremendous biodiversity and are critical seasonal habitat for migratory songbirds and waterfowl, in addition to species of concern such as swallowtail and Mississippi kites, which utilize these coastal bottomlands as summer nesting habitat. Because many of these bottomland forests are ephemerally flooded for periods throughout the year, they are also able to support both upland aquatic communities and terrestrial species. Bottomland forests follow rivers, and so, tend to be linear in their distribution. This geographical context facilitates the movement of local and regional faunal species and larvae, while river flow facilitates the dispersal of seeds.

Maritime forests – Maritime forests represent a climax ecological community in coastal Georgia. Dominated by live oaks, southern magnolias, palmetto and cabbage palms, these forests provide critical wildlife habitat; groundwater and aquifer replenishment zones; buffers against degrading agents of upland runoff; and soil stability from stochastic events such as flooding and tidal storm surges. Maritime forests are particularly important for migratory and nesting songbirds. Many of

the maritime forest stands are associated with The Coastal Georgia Birding Trail, a very popular tourist attraction that incorporates a large extent of this forest type within its trail system. Many of the larger stands of maritime forests in coastal Georgia remain on undeveloped barrier islands, giving enhanced wildlife habitat value to stands of this forest type associated with mainland areas.

Longleaf Pine–Wiregrass Savannas– Longleaf pine forests, along with their associated wiregrass understory, are also known as fire dependent or fire dominated habitats as they depend upon frequent fire regimes to maintain biological and ecosystem health. Longleaf pine communities contain some of the highest vegetative biodiversity recorded in North America. Likewise, they provide habitat for some of the State’s rarer animal species, including the red-cockaded woodpecker, gopher tortoise and indigo snake. Longleaf pine communities were once a dominant forest type in coastal Georgia’s landscape. However, due to harvest for timber products such as lumber and turpentine, vast acreages of this forest were destroyed. Several fragmented stands of longleaf pine in need of restoration plantings, improved fire regimes and the reintroduction of native faunal species can still be found scattered throughout Georgia’s coastal plain.

River Corridor and Floodplain Forests – There are five (5) major coastal river systems in Georgia: the Savannah, Ogeechee, Altamaha, Satilla and St. Marys rivers. River corridor and floodplain forests associated with these aquatic resources provide an uptake and conversion buffer for non-point source pollution prior to its downstream dispersal. Much like bottomland forests, these forest types provide habitat for species of concern such as the Mississippi and swallow-tail kites. They also act as water thermal shelters during extreme summer conditions and as stabilizing land-water margin buffers against flooding and erosion. Recreationally, these forest types provide scenic outdoor resources for user communities such as campers, hikers, fishermen, hunters, tourists and boaters. Many of these forests are jurisdictional wetlands and are unsuitable for residential development; however, because of their proximity to river resources, this forest type is under tremendous and continual pressure for conversion and fragmentation. Floodplain conservation in the Coastal Plain is also an important component in community planning for sea level rise adaptation.

Historical or Culturally Significant Lands – Much of the land in the coastal area has ties to Georgia’s rich history. Several properties contain historic structures or ruins related to American Indian villages, pre-colonial communities, rice or cotton plantations, War of 1812 or Civil War battles, slave cabins, or post-Civil War communities with ties to a fading modern culture (e.g., Gullah). While many of these significant sites are currently protected through public or private efforts, many others are located on private property and are unprotected.

Globally and State Imperiled Habitats – Georgia is currently engaged in a project entitled the Coastal Georgia Land Conservation Initiative (CGLCI). The Initiative has resulted in the mapping of vegetative habitats throughout Georgia’s coastal zone (11 counties) and prioritization of those habitats based on a State or global level of imperilment. For example, habitats are ranked on a global scale of G1-G5, with G1 indicating globally-rare habitats and G5 indicating relatively abundant communities. A similar ranking based on a state-wide scale of imperilment

is currently under development. The GA CELCP Plan will prioritize projects that conserve globally-ranked G1-G3 habitats as well as state-ranked habitats on a similar scale.

Greenway/Habitat Corridors – To date, Federal, state and local entities have worked to acquire and permanently protect over 100,000 acres of land throughout coastal Georgia. Conservation lands that contribute to the goals of already-protected lands to create habitat corridors and greenways are essential because they provide natural habitat connections and decrease fragmentation of priority area habitats. Projects that enhance the domain, quality or biodiversity by infusing adjacent, contiguous holdings to these previously acquired lands will be given higher priority.

### **Need for Conservation of Priority Areas**

The types of lands prioritized above are valued as part of the larger coastal plain ecosystem and the need for their conservation through acquisition is great. In coastal Georgia, the economics of developing land has changed, and land is now valued highest for its development potential, rather than for its role in ecosystem maintenance and function. The Georgia CELCP Plan makes as its priority any of the coastal and estuarine lands described above that protect and enhance ecosystem values and the area's unique historic and cultural heritage.

As the lands considered most suitable for development are converted, the ensuing pressure to develop will further extend into fringe areas that may be more critical to the functions of natural coastal ecosystems – areas such as high order streams, isolated and persistent freshwater wetlands and marsh hammocks. Development along the fringes of Georgia's salt marshes and remaining waterfront property on barrier islands and the mainland has increased dramatically over the last 25 years. People are migrating and living on our coast in increased numbers due in part to the unique beauty and productivity of the coastal environment. The coastal population is projected to increase by 32%, adding almost 300,000 new residents to coastal Georgia over the next 20 years (Georgia Office of Planning and Budget, Georgia 2030, March 12, 2010). This trend threatens the very resources that draw people here, as higher human populations degrade ecological processes and functions by direct impacts associated with land conversion and habitat fragmentation, in addition to indirect impacts associated with non-point source pollution. Because of this demographic migration, degradation of the state's coastal ecosystems is occurring at an accelerated pace, making the protection of sensitive and poorly represented natural environments even more important.

According to the IPCC Fourth Assessment Report: Climate Change 2007, global mean sea level rise scenarios project between 0.28 to 0.43 meters (~1 to 1.5 feet) in rise by the end of the 21<sup>st</sup> century. For coastal habitats to naturally migrate and retreat up the western and inland topographical gradient, in order to maintain their existence, these convertible areas and gradients must remain available to accommodate rising sea levels. Conserving areas that provide for the anticipated retreat will allow natural habitats to be sustained while reducing future conflicts with development. Potential conflicts occurring due to sea level rise include: increased hardening of shorelines, infrastructure loss and replacement, loss of habitat due to development barriers and property and structural loss and damage. Strategic acquisition of lands through GA CELCP can reduce many of these anticipated conflicts by conserving critical natural areas while simultaneously managing against human property impacts.

The need for Georgia to maintain land acquisition programs such as the GA CELCP is vital. Concurrent resource conservation, coupled with the vision of this Plan, allows Georgia to invest in a coastal land conservation program, providing the State with a thoughtful process to ensure that lands critical to the maintenance of natural coastal systems and processes are protected.

#### **IV. Coastal and Estuarine Land Conservation Project Areas**

Land acquisition projects proposed under Georgia's CELCP Plan must be physically located entirely within the eleven county Georgia CELCP boundary (see Figure 1) and must be located within or serve to protect one or more of the following Project Areas:

- Salt Marsh & Shellfish Growing Areas –The state of Georgia claimed jurisdictional title to nearly all of the State's 350,000 acres of salt marshes by enacting the Coastal Marshlands Protection Act of 1970. The state is also charged with management of state waters and shellfish growing areas. The conservation of uplands adjacent to or within proximal distance of shellfish growing areas can prevent the degradation of water quality which could otherwise impact the economic and/or natural resources value of these areas. Project priority areas include areas adjacent to marshlands or within the vicinity of shellfish growing areas. The shellfish growing areas are located in Chatham, Liberty, McIntosh, Glynn, and Camden counties (see Appendix A). For questions about the growing areas please contact Dominic Guadagnoli at (912) 264-7218.
- Marsh Hammocks – Hundreds of hammocks can be found in the marshes along Georgia's 110-mile coastline between Savannah and St. Mary's. These islands range in size from less than an acre to more than 20 acres and provide unique and critical habitat for many of the State's coastal species. The Georgia Department of Natural Resources Coastal Resources Division conducted an inventory of marsh hammocks, which included their ownership and development status. This information is available in a Geographic Information Systems database and can be obtained by contacting Jill Andrews at (912) 264-7218.
- River Corridors and Floodplains – There are five major river and tributary systems flowing through coastal Georgia; the St. Marys, Satilla, Altamaha, Ogeechee, and Savannah. While laws of the State largely protect the rivers and streams themselves, the associated floodplains and adjacent uplands are not as highly protected and are, therefore, identified for protection in the GA CELCP Plan.
- Barrier Islands – Benefiting from the foresight of the State's earlier leaders, many of Georgia's fourteen barrier islands are in public or public/private ownership and are protected as wildlife refuges, national seashores, or state managed lands. Only four barrier islands are accessible by car and are significantly developed, including Jekyll, St. Simons, Tybee, and Sea Islands. The remaining privately owned islands, or significant undeveloped portions of land located on these barrier islands, are project areas for conservation under the GA CELCP Plan, provided that the project contains one or more of the conservation priorities.



- Freshwater Wetlands – Wetlands are critical to the healthy functioning of Georgia’s coastal ecosystems. Freshwater wetlands include both floodplain and inland wetlands such as cypress ponds, bogs, and Carolina Bays and hillside seeps. These wetlands are generally in association with fresh water portions of the five coastal river systems or are isolated wetlands that are not permanently connected to a water body. Aerial photography and National Wetland Inventory maps generally depict the size and distribution of freshwater wetlands; however, ground surveys are necessary to accurately delineate wetland areas. Updated National Wetland Inventory maps for coastal Georgia can be found at <http://www.fws.gov/wetlands/>.

Carolina Bays are unique coastal wetland types and have been located through a survey conducted by the Department of Natural Resources. Though rare, a small number of Bays are known to exist in coastal Georgia and are most likely to be found in the interior counties of Effingham, Wayne, Long and Brantley counties (<http://www.georgiawildlife.com/node/819>).

- Significant Forest Types – Bottomland or floodplain forests, maritime forests, and longleaf pine forests were all once prominent on the coastal Georgia landscape. These areas still provide tremendous biodiversity resources to our State’s coastal plain and are the primary habitats for a number of rare and threatened species. However, vast acreages of these forest types have been lost to silviculture conversion or development. Numerous fragmented stands of these forests still exist today, although many of these are in need of restoration or immediate conservation. Geographic Information Systems land cover data and anecdotal and historical information can indicate where these forest types once existed, and aerial photography and ground surveys can be used to identify and assess the condition of current stands. Please refer to the Georgia Wildlife Action Plan’s High Priority Habitat types for the Coastal Plain for specific forest types of concern ([http://www.georgiawildlife.com/sites/default/files/uploads/legacy\\_assets/Documents/cwcs/13\\_SouthernCoastalPlain.pdf](http://www.georgiawildlife.com/sites/default/files/uploads/legacy_assets/Documents/cwcs/13_SouthernCoastalPlain.pdf)).

Also, global ranking of imperiled habitats can be found through the Coastal Georgia Land Conservation Initiative (<http://www.conservecoastalgeorgia.org/>)

- Historical or Culturally Significant Areas – Evidence of earlier civilizations and of pre-colonial and colonial settlements are found throughout the entire GA CELCP area. Much of this evidence is located on privately owned lands and is either undocumented or was documented prior to development. To date, several coastal communities have undertaken historical and archaeological surveys to identify areas of historical and/or cultural significance and have reported that data to the Georgia Department of Natural Resources’ Historic Preservation Division. (<http://gashpo.org/>)

## V. Land Conservation Efforts in Coastal Georgia

The identification of Project Areas for Georgia's CELCP Plan was drawn largely from other land conservation efforts already existing in the coastal area. These programs and activities are incorporated into this Plan by reference and are briefly summarized below.

Of the plans and conservation efforts listed below, several contain maps and data sources that help identify the location of project areas described in the "Project Areas" Section above. Those plans are:

- **Georgia State Wildlife Action Plan** – This plan identifies habitats for priority species and strategies to conserve and restore priority species and habitats, including coastal species within the GA CELCP area.
- **Coastal Marsh Hammocks Advisory Council** – This effort resulted in a Geographical Information Systems database that maps all known hammocks and documents their development or conservation status and ownership.
- **Conservation of Carolina Bays in Georgia** – This report identifies these unique wetland landforms existing in the state; it serves as a guide for identifying Carolina Bays suitable for acquisition through the GA CELCP.
- **Coastal Georgia Land Conservation Initiative** – This project resulted in a set of habitat maps that give local governments, conservation organizations and city planners a baseline of the critical and imperiled communities and important resources within each county.
- **Sapelo Island National Estuarine Research Reserve** – The Reserve has developed a map of its targeted watershed boundary; projects within this area would be considered a benefit to the Reserve.

### **Georgia Land Conservation Act**

In December 2003, Georgia's then-Governor Sonny Perdue created the Georgia Land Conservation Partnership Advisory Council to develop the first-ever statewide comprehensive land conservation plan. The Advisory Council issued the Georgia Land Conservation Partnership Plan in August 2004 that focused largely upon the State's acquisition of large, strategic parcels of land, including fee or less than fee interests; grants and loans to counties and cities for the acquisition and protection of green space; and support and incentives (tax) to increase land conservation by private landowners, land trusts, and philanthropic organizations.

As a result of the Advisory Council's efforts, Governor Perdue signed into law the Georgia Land Conservation Act in April 2005. The Act incorporated many of the recommendations of the Georgia Land Conservation Partnership Advisory Council, including the creation of the Georgia Land Conservation Program (GLCP) and establishment of a trust fund and low-interest loan fund to provide financial assistance to state agencies, local governments and non-governmental organizations for the permanent protection of natural, agricultural and cultural resources.

The Georgia Land Conservation Council created by the Act solicits land acquisition and conservation easement proposals from State agencies, local governments and non-government conservation organizations that permanently protect conservation lands. Priority is given to proposals that are multi-jurisdictional in scope or regional in impact.

Additional legislation in 2007 implemented another recommendation of the Advisory Council by creating the Georgia Conservation Tax Credit Program. Administered by the GLCP, the Tax Credit Program leverages the federal deduction for conservation donations by offering state income tax credits for certified bargain sales or outright donations of conservation lands or easements.

The Georgia Land Conservation Program and GA CELCP are complementary in their objectives. Together, these Programs will advance land conservation efforts in coastal Georgia. For more information see the Georgia Land Conservation Program (<http://glcp.georgia.gov>).

### **Georgia State Wildlife Action Plan**

The Georgia Department of Natural Resources' Wildlife Resources Division began in 2002 to develop a comprehensive plan for conserving Georgia's wildlife as part of a federal mandate in order to qualify for federal wildlife grants. Georgia's plan, completed in August 2005, is based upon the best available data on the distribution and abundance of wildlife species in the state. It identifies habitats for priority species and identifies challenges, research, and strategies to conserve and restore species and habitats. A primary goal of this plan is for the State to be proactive regarding imperiled species so as to avoid further listing of species under the Endangered Species Act. Coordination with other agencies and organizations that manage land or administer wildlife conservation programs is a key factor of this effort. For more information see the Georgia Wildlife Action Plan at <http://www.georgiawildlife.com/conservation/wildlife-action-plan>. An overview and discussion of high priority sites and landscape features within the Southern Coastal Plain ecoregion, which encompasses Georgia CELCP area, can be found at: [http://www.georgiawildlife.com/sites/default/files/uploads/legacy\\_assets/Documents/cwcs/13\\_SouthernCoastalPlain.pdf](http://www.georgiawildlife.com/sites/default/files/uploads/legacy_assets/Documents/cwcs/13_SouthernCoastalPlain.pdf).

### **Coastal Marsh Hammocks Advisory Council and Stakeholders' Group**

Hammocks are also known as back barrier islands. Hundreds of these islands lie in the marsh off of Georgia's mainland and barrier islands. Many hammocks are adjacent to upland areas where a bridge can be constructed to provide access. Others are a great distance away from the mainland or barrier islands, or they are separated from these areas by wide rivers making the construction of bridges impractical. In these cases, the hammocks can be reached only by boat.

Spurred by the increased number in requests for bridge permits to these islands, the Georgia Department of Natural Resources appointed the Coastal Marsh Hammocks Advisory Council in 2001. The Council was asked to identify the ecological importance of marsh hammocks and evaluate the potential impacts of their development. In March 2002, the Council published a report that left a number of issues unresolved. The issues were then taken up by a broad-based stakeholders' group whose charge it was to design a fair and equitable approach to marsh hammock conservation and management while protecting the integrity of the Coastal Marshlands Protection Act. In late 2004, the group issued a report of their dialogue entitled "*Facilitating Human Dimensions Research on the Future Management of Coastal Marsh Hammock Development.*" The report noted the group's progress toward resolving some differences between stakeholder types and recommended a series of policy strategies to the Department.

An additional outcome of this effort was the development of a marsh hammocks Geographical Information Systems database that maps all known hammocks and documents their development or conservation status and ownership. This database will be useful to locate hammocks suitable for acquisition. This information is available in a Geographic Information Systems database and can be obtained by contacting Jill Andrews at (912) 264-7218.

### **Conservation of Carolina Bays in Georgia**

“*Conservation of Carolina Bays in Georgia*” is a report of the Georgia Department of Natural Resources’ Wildlife Resources Division. The Division conducted a study to identify these unique wetland landforms existing in the state and to assess their condition. The results of the study showed that many Carolina Bays have been degraded and demonstrated the need for conservation of this resource. This report will guide the identification of Carolina Bays suitable for acquisition by the GA CELCP (Carolina Bays of Georgia; at <http://www.georgiawildlife.com/node/819>),

### **Coastal Georgia Land Conservation Initiative**

The Coastal Georgia Land Conservation Initiative is a collaborative between the DNR, Georgia Conservancy and the Association of County Commissioners of Georgia, created to preserve critical coastal lands and promote sustainable growth and development.

DNR Wildlife Resources Division created detailed maps of the ecological communities for all counties within the GA CELCP boundary using the U.S. National Vegetation Classification (NVC), which is maintained by NatureServe ([www.natureserve.org/](http://www.natureserve.org/)). An ecological community is a group of interacting plant and animal species that live in the same place. The ecological communities of the coast represent a diverse set of natural resources and provide habitats for many rare plant and animal species, while also supporting basic ecological functions on which people rely. For example, the barrier islands and associated inter-tidal salt marshes reduce the impact of storm surges, which can damage homes and roads. The project has led to the discovery of new habitats and assisted in updating descriptions of other known communities along the Georgia coast. See the following website for more information: (<http://georgiawildlife.dnr.state.ga.us/content/displaypressrelease.asp?ArticleID=1447>).

This project gives local governments, conservation organizations and city planners a baseline map of the critical and imperiled communities and important resources within each county. With this in hand, coupled with technical assistance from the other organizations involved in this project, coastal counties can plan for future development more sustainably by keeping natural resources in mind and ensure their existence in the future. The habitat maps can be obtained from DNR/CRD. For more information see Coastal Georgia Land Conservation Initiative at <http://www.conservecoastalgeorgia.org/>.

### **Coastal Regional Plan**

The State of Georgia places regional planning as a top priority for promoting quality growth. Each Regional Commission throughout the state was charged with preparing a regional plan that allows communities to identify problems and opportunities that are evident from a regional perspective and to focus on how actions at the local level impact the region as a whole. Regional

plans should be used to coordinate the activities of the regional commission, local governments, public agencies, and other parties in the region to further promote quality growth.

Georgia's coastal zone is primarily represented by the Coastal Regional Commission (CRC), which serves the 9 of the 11 counties that comprise the GA CELCP area. The Regional Plan of Coastal Georgia was adopted by the CRC Council on June 9, 2010. This plan will be amended in June 2011 in response to comments received throughout the first year of implementation as well as the need to accommodate the evaluation and monitoring methodology once it is developed. For more information about the Coastal Regional Plan, visit [http://crc.ga.gov/planning/Pages/planning\\_regional.aspx](http://crc.ga.gov/planning/Pages/planning_regional.aspx).

### **Sapelo Island National Estuarine Research Reserve (SINERR)**

Sapelo Island, Georgia's fourth largest barrier island, is located midway on the Georgia coastline and is separated from the mainland by 5 miles of marsh and tidal waterways. A total of 16,500 acres make up Sapelo Island, of which nearly 5,600 acres are tidal salt marsh. The Sapelo Island National Estuarine Research Reserve occupies just over one-third of Sapelo and is comprised of 2,100 upland acres and 4,000 acres of tidal salt marsh. The Reserve lies in the midst of an estuary where the currents of Doboy Sound and the Duplin River converge. SINERR, one of 28 sites within the National Estuarine Research Reserve System administered by NOAA, is managed by the Georgia Department of Natural Resources Wildlife Resources Division. The reserve is committed to research, education and outreach stewardship, and sound management of coastal resources. It provides for and promotes research and monitoring programs primarily within the immediate estuarine area of the Duplin River and Doboy Sound. It also serves as a condition reference site of high quality salt marsh for comparison to similar impacted areas. Some of its programs include the System Wide Monitoring Program (SWMP), the Coastal Training Program and the Georgia Coastal Ecosystems Long Term Ecological Research (GCE LTER) program. Sapelo Island is considered an excellent research site due to minimal development and disturbance of surrounding systems and frequently hosts academic scientists conducting applied studies focusing on coastal program needs. In order to continue to provide for a quality reference site, it is important that disturbances and upstream impacts be minimized. For more information, the Sapelo Island National Estuarine Research Reserve Management Plan 2008-2013 is available at: [http://www.nerrs.noaa.gov/Doc/PDF/Reserve/SAP\\_MgmtPlan.pdf](http://www.nerrs.noaa.gov/Doc/PDF/Reserve/SAP_MgmtPlan.pdf)

Projects that justifiably protect resources surrounding SINERR, e.g. which are located within the SINERR Targeted Watershed, will be given additional consideration. See Figure 2 (below) - a map of SINERR's Targeted Watershed Boundary or visit: <http://coastalmanagement.noaa.gov/land/targetedpdfs/sapelotwb.pdf>

### **The Department of Defense (DoD) Readiness and Environmental Protection Initiative (REPI) and the Army Compatible Use Buffer (ACUB) Programs**

The DoD developed the REPI program to address issues of potential encroachment at participating DoD military bases (all Services). The Army developed the Army Compatible Use Buffer (ACUB) program to supplement the REPI program at Army Installations. The efforts allow military installations to work with state, local communities, and NGO partners to preserve habitat in the vicinity of the installations as well as limit incompatible development. The REPI and ACUB initiatives anticipate protecting approximately 120,000 acres surrounding Fort

Stewart and creating corridors along the Ogeechee and Canoochee Rivers. For more information on Fort Stewart's ACUB program please contact Mr. Tim Beatty at (912) 767-7261.

### **The Nature Conservancy Land Protection Efforts**

The Nature Conservancy (TNC) works in coastal Georgia to protect ecologically significant land and waters. They are engaged in efforts of differing scales in the southeast to identify coastal conservation targets and threats and to develop and implement strategies to protect sensitive natural environments and species. One initiative encompasses salt marshes, hammocks, estuaries, maritime and inland maritime forests and freshwater tidal marshes. Threat assessment and conservation strategies regarding the type of development practices and conservation adjacent to the marsh are important components. McIntosh County is targeted as a pilot project. This is a collaborative effort involving Georgia DNR, Sapelo Island Estuarine Research Reserve, The Nature Conservancy and others. Conservation of riverine and longleaf pine forests in the Altamaha River watershed through acquisition and conservation easements is also a high priority for The Nature Conservancy.

Working with partners, The Nature Conservancy is developing a Mid-Atlantic Marine Eco-region Assessment and conservation plans that include conservation areas from the Altamaha to Ogeechee River estuaries and from the St. Mary's to Satilla River estuaries.

### **Georgia Conservancy**

The Georgia Conservancy works in coastal Georgia to support policies and programs that help protect and preserve the State's coastal resources. Recently, the Georgia Conservancy has been instrumental in developing management plans for natural resource conservation, historic protection and wildlife management on barrier islands; assisting in negotiations to gain additional land for wilderness designation on Cumberland Island; and nominating and achieving the Scenic America *Last Chance Landscape* designation for Georgia's marsh hammocks. Georgia Conservancy has also instituted the statewide "Blueprints For Successful Communities" program that provides direct technical assistance to communities to create sound conservation and quality growth strategies. Georgia Conservancy is also an integral partner to the Coastal Georgia Land Conservation Initiative and is also providing education and outreach to coastal communities on opportunities to adapt to sea level rise.

### **Georgia Coastal Management Program Technical Assistance Initiative**

The Georgia Coastal Management Program provides direct technical assistance to all the counties within the GA CELCP area. The Technical Assistance Initiative has assisted land conservation efforts in several coastal communities by participating in the development of local greenspace/land acquisition plans, identifying and mapping locally important natural and historical resources and developing management strategies for publicly owned and protected lands. This initiative will continue to assist coastal communities in the selection of conservation lands for purchase or easement. For more information, please contact Sonny Emmert at (912) 264-7218 or [Sonny.Emmert@dnr.state.ga.us](mailto:Sonny.Emmert@dnr.state.ga.us).

### **Local Greenspace Plans**

As part of the former Georgia Community Greenspace Program, a number of communities throughout coastal Georgia developed greenspace plans that identified local priorities for land

conservation and acquisition. At the time of the Program, communities received sums of money from the State to purchase land, conservation easements, or development rights. However, funding for the Community Greenspace Program was discontinued before many local land protection goals were met.

In April 2005, the Georgia Land Conservation Act was signed into law, creating a new dedicated source of funding to implement local greenspace plans. Incorporating these greenspace plans into the Georgia CELCP Plan will allow coastal local governments to access CELCP funding to augment the State's land conservation program.

Local planning initiatives such as the Chatham County Resource Protection Council have a program in place that reviews potential lands for acquisition. Camden County, working with Trust for Public Land, has produced a County Greenprint that identifies potential conservation lands within the county.

## **VI. Georgia Coastal and Estuarine Land Conservation Plan Implementation**

### **Lead Agency**

The Georgia Department of Natural Resources' Coastal Resources Division (DNR) is the lead agency for coordinating the establishment and implementation of the Georgia Coastal and Estuarine Land Conservation Program Plan. The DNR will be responsible for soliciting projects that are consistent with the Conservation Priorities and Project Areas outlined in this Plan, reviewing them for completeness, prioritizing them according to State ranking criteria, and nominating projects to the national selection process. The DNR will be the primary applicant for federal CELCP funds. The DNR will also be responsible for passing through and ensuring that allocated funds are used for the purposes of and in a manner consistent with this program.

### **Solicitation of Projects**

The National Oceanic and Atmospheric Administration will notify all coastal states participating in the national CELC Program of annual funding opportunities, recognizing that actual funding is dependent upon Congressional appropriations. At that time, states will have an opportunity to submit priority projects to compete for funding in the national selection process.

Upon notification of a funding opportunity from NOAA, the DNR will solicit land acquisition projects from eligible entities, including local governments and state agencies. All projects will be reviewed in accordance with the Georgia CELCP Plan to ensure that each project is located within a Project Area and contains one or more of the Conservation Priorities as stated above. Applicants will be instructed to prepare applications according to the Federal Funding Opportunity published in the Federal Register. A site visit to the proposed project area by DNR staff may also be required.

Applications for funding will be received by the DNR and reviewed for completion and adherence to the state CELCP Plan. Late applications will not be considered. Incomplete applications may be resubmitted if received before the deadline.

### Who May Apply

Eligible applicants who may apply for and receive CELCP funding include the DNR, as the State's lead agency, and Sapelo Island National Estuarine Research Reserve. Other State agencies with the authority to acquire and manage land for conservation purposes or hold conservation easements are also eligible, including but not limited to: the Georgia Department of Transportation, provided that projects are not for mitigation purposes; University System of Georgia; Sapelo Island Heritage Authority; and Jekyll Island Authority. Applications may also be received from area-wide or regional agencies and local governments, provided that each has the authority to acquire and manage land for conservation purposes. Non-profit organizations are not eligible to apply for funds from this Program. However, eligible applicants may contract with a non-profit organization to perform some elements of the proposed project.

The recipient of CELCP funds, or other appropriate public agency designated by the recipient in their application, will hold title to the land or interests in the land in perpetuity.

### Qualifying Projects

To be eligible for CELCP funding, a project must:

- Be located within the Georgia CELCP boundary area
- Be located within a Project Area described in this Plan
- Contain one or more of the Conservation Priorities described in this Plan
- Meet the National Eligibility Criteria provided below
- Match federal CELCP funds with non-federal match at a ratio of 1:1
- Be held in public ownership (fee simple or conservation easements) and provide conservation in perpetuity
- Provide public access or other public benefits

### National Eligibility Criteria

To be eligible for the national CELCP, projects must meet the following criteria:

- Protects important coastal and estuarine areas that have significant conservation, recreation, ecological, historical, or aesthetic values, or that are threatened by conversion from their natural or recreational state to other uses;
- Gives priority to lands which can be effectively managed and protected and that have significant ecological value;
- Directly advances the goals, objectives, or implementation of the state's coastal management plan or program, NERR management plans approved under the CZMA, national objectives of the CZMA, or a regional or state watershed protection plan involving coastal states with approved coastal management plans; and
- Is consistent with the state's approved coastal management program.

### Eligible Uses

CELCP funds may be used for the following purposes as per the Final Program Guidelines published June 6, 2003 (Note: please refer to revised national CELCP Program Guidelines once they are published as final).

- Acquisition Projects: Acquisition of properties or interests in properties from willing sellers, provided that the terms and conditions will ensure that the property will be



administered for conservation in perpetuity, including direct expenses relating to the acquisition of lands and interests in lands acquired under the authority of the CELCP; and

- Certain initial costs for land stewardship, not to exceed 5 percent of the award and not to exceed 3 years or the duration of the award period, to allow for signage, public safety, or other stewardship purposes.

### Ineligible Uses

(Note: please refer to revised national CELCP Program Guidelines once they are published as final.)

The federal share of CELCP funds may not be used for the following purposes:

- Funding long-term operations, maintenance, and management of the land;
- Construction of buildings, boat launching facilities, docks or piers, shoreline armoring, or other facilities;
- Research;
- Acquisition of lands, or interests in lands, that completely restrict access to specific persons (e.g. non-residents of a community);
- Acquisition of lands, or interests in lands, to comply with mandatory or compensatory mitigation for recent or pending habitat losses resulting from the actions of agencies, organizations, companies or individuals;
- The sole or primary purpose of enforcing fish, wildlife, or other regulations, except when necessary for the accomplishment of approved project purposes;
- Acquisition of land for active recreation, such as sports facilities, water parks, playgrounds, or similar uses; and
- Acquisition of properties where the acquisition would negatively impact working waterfronts.

### Projects Benefiting the SINERR Targeted Watershed

The national CELC Program will dedicate 15% of funding each year to projects that benefit designated National Estuarine Research Reserves. In Georgia, this would include projects that support the goals of the Sapelo Island National Estuarine Research Reserve and that are located within the SINERR targeted watershed boundary (Figure 2). Such projects must be accompanied by a letter of support from the Reserve Manager.

For more information on NERR Targeted Watershed Boundaries and how to download the latest map files (shapefile or Google earth format) please visit the NOAA Coastal and Estuarine Land Conservation Program's Targeted Watersheds page online at:

<http://coastalmanagement.noaa.gov/land/targetwatersheds.html>



*Figure 2: SINERR Targeted Watershed (1999)*

### **Selection of Projects**

The DNR will review project proposals to determine that they qualify, are applicable to the GA CELCP Plan, meet the National Eligibility Criteria, are located within a Project Area, and contain one or more of the Conservation Priorities as listed above. Project applicants are strongly encouraged to submit a current property appraisal, show applicability to the GA CELCP Plan’s goals, and demonstrate applicability to one or more of the listed conservation efforts outlined above.

The DNR will score and rank eligible proposals according to a “Decision Matrix.” The Decision Matrix is a tool to evaluate multiple proposals against a specified set of criteria. Proposals must meet a minimum threshold of 70 points in order to be forwarded to NOAA to compete in the national competition.

The DNR will then submit up to three top-ranked projects to NOAA on behalf of the applicant to compete for funding at the national level.

## **VII. Coordination and Public involvement**

Georgia’s CELCP Plan was developed through a process of interagency coordination and public involvement. On December 5, 2003 members of the Georgia Coastal Management Program staff

hosted a scoping meeting at the Coastal Regional Headquarters with officials of the Georgia Department of Natural Resources' Wildlife Resources Division and The Nature Conservancy. The concept of a GA CELCP Plan was introduced to the group and a roundtable discussion ensued concerning the development of the CELCP Plan and the role that Plan would play in the State's Comprehensive Wildlife Conservation Strategy.

On March 15, 2004 members of the Coastal Management Program staff made a presentation concerning the GA CELCP to the Habitat Sub-committee of the Georgia Coastal Hammocks Work Group. The two groups agreed to work together in development and implementation of the Plan.

On September 17, 2004, a public scoping meeting was conducted to solicit input on the types of lands and values to be protected through the GA CELCP. In addition, coastal conservation efforts, including the ongoing efforts of the Department of Natural Resources, were discussed for inclusion into the Plan.

On January 19, 2005, the draft GA CELCP Plan was presented to the Georgia Coastal Management Program's Coastal Advisory Council. The Council is comprised of local coastal governments, state agencies, non-governmental organizations, researchers, and citizens-at-large, and all Council meetings are open to the public. Staff received verbal comments on the Plan from Council members and incorporated the changes.

On February 15, 2005, Coastal Management Program staff forwarded the draft GA CELCP Plan to members of local governments and coastal stakeholders for comment. The comment period closed on March 15, 2005, and a total of three (3) written comments were received from the public. Comments were incorporated into the Plan as appropriate.

In June 2005, the Board of Natural Resources approved the Georgia Coastal and Estuarine Land Conservation Program Plan. The plan was subsequently forwarded to NOAA and was conditionally approved with comments in 2007.

In accordance with the conditionally-approved plan, DNR initiated a 5-year plan update process through which NOAA's remaining comments would be addressed and general information would be updated, added or deleted depending on current activities. Suggested changes were scoped at a meeting of the Coastal Advisory Council on July 22, 2010.

In December 2010 Coastal Management Program staff completed draft revisions to the Georgia CELCP Plan and sent the revised plan to partner agencies for review and comment, including: DNR Real Estate Section, DNR Wildlife Resources Division, Georgia Land Conservation Program, SINERR, The Nature Conservancy, Georgia Conservancy, and Georgia Land Trust. A partners' meeting was held on February 15, 2011 to discuss comments and revisions to the plan. The revised document was then sent to NOAA for preliminary review on March 1, 2011. Comments and edits were received from NOAA on June 2, 2011 and subsequently incorporated into the plan.

The revised Georgia CELCP Plan was made available for public comment from July 19 – August 19, 2011. Notices of the comment period were placed with local media and the CRD website. Coastal Advisory Council members were also notified. No comments were received.

Interagency coordination will continue throughout the remainder of the development and implementation of Georgia’s CELCP Plan. State agencies, including DNR and Sapelo Island National Estuarine Research Reserve, will be directly involved in establishing land acquisition priorities, selection of projects, and monitoring of acquired lands.

## **VIII. Certification**

### **Certification that this Plan is consistent with Georgia’s approved Coastal Management Program:**

It is the determination of the Georgia Department of Natural Resources Coastal Resources Division, lead agency for the Coastal Management Program, that this proposed activity would be undertaken in a manner consistent to the maximum extent practicable with the mission and enforceable policies of Georgia's Coastal Management Program.

See Appendix B  
\_\_\_\_\_  
Manager, Georgia Coastal Management Program

## IX. Georgia CELCP Land Acquisition Priority Decision Matrix

The following document will be used to score eligible grant applications submitted for consideration under the Georgia Coastal and Estuarine Land Conservation Program Plan. The criteria are adapted from the national Coastal and Estuarine Land Conservation Program and the Georgia Land Acquisition Priority Decision Matrix. All eligible projects will be scored by independent reviewers and then averaged to attain the final project score. A minimum score of 70 is required to be eligible for national competition submission. Georgia will submit the top-ranked projects with qualifying scores into the national competition (NOAA's funding opportunity notice typically allows submittal of up to three projects). The maximum score a project can receive is 100 points. For explanation of scoring sheet, see scoring criteria summary.

1) Ecological Value	_____
a. Georgia CELCP priority area (up to 15 pts.)	_____
2) Conservation Value (up to 10 pts.)	_____
3) Recreational Value (up to 5 pts.)	_____
4) Historic/Cultural Value (up to 5 pts.)	_____
5) Aesthetic Value (up to 5 pts.)	_____
6) Relevance to Conservation Planning (up to 10 pts.)	_____
7) Project Manageability (up to 5 pts.)	_____
8) Long-term use (up to 5 pts.)	_____
9) Threat of Conversion (up to 5 pts.)	_____
10) Acquisition ability (up to 5 pts.)	_____
11) Managerial Capacity (up to 5 pts.)	_____
12) Project Readiness (up to 5 pts.)	_____
13) Project Costs (up to 15 pts.)	_____
14) SINERR Related (up to 5 pts.)	_____
<b>Total Points</b>	_____

## Scoring Criteria Summary

### Project:

- 1) **Ecological Value: Up to 15 points.** This category is scored on the habitat quality of the priority area; a maximum amount of 15 points can be awarded for this category. Priority areas are listed in the Georgia Coastal and Estuarine Land Conservation Program Plan. Priority areas do not have to encompass the entire site but must contain or protect a portion of a priority area.

In order to be considered outstanding and receive the maximum points the project would:

- Protect/restore ecologically important habitats that serve essential ecological functions for fish and wildlife
  - Protect rare, threatened, or endangered species
  - Preserve natural areas with high levels of biodiversity
  - Protect areas of valid biological size to support viable populations of species
  - Protect features that reduce the impacts of coastal hazards and sea level rise
  - Preserve natural features that would control flooding and protect groundwater recharge areas
  - Protect/restore riparian buffers that would prevent nonpoint source pollution
  - Wholly contain and/or protect a priority area
- 2) **Conservation Value: Up to 10 points.** In order to be considered outstanding, the project area should support larger conservation planning, establish corridors or linkages between similar habitats, be able to be functionally restored if needed and contain multiple values (ecological, recreation, historic, and aesthetic).
  - 3) **Recreation Value: Up to 5 points.** In order to be considered outstanding, the project area should support recreational opportunities consistent with GA CELCP goals, provide access in areas of demonstrated need and be accessible and open to the public. It is understood that not all projects will support recreation because they are sensitive areas and access should be limited. However, if they are of viable size, a portion of the project area could potentially be open to the public as long as it would not compromise the area.
  - 4) **Historic/Cultural Value: Up to 5 points.** In order to be considered outstanding, the project area should contain nationally recognized features or designations. Fewer than 5 points would be awarded for state recognized or designated sites. Three or fewer points would be given for locally designated sites. The project would receive partial credit should it contain documented evidence of significant features but has not yet been evaluated. Points awarded would depend on documentation and confidence of significant features that would potentially lead to further recognition.
  - 5) **Aesthetic Value: Up to 5 points.** There is some subjectivity in the ranking of projects according to aesthetic value. Sites protecting viewsheds of designated scenic routes, rivers, or other features would receive full allocation of points. Points would also be awarded if the site contributes or protects the viewshed of the surrounding area or significant features depending upon the level of contribution.

- 6) **Relevance to Conservation Planning: Up to 10 points.** A project must be consistent with the Georgia CELCP Plan and the Georgia Coastal Management Program as documented in the proposal. In order to receive the full allotment of points, a project should also complement or be an element of other federal, state, regional or local planning or land conservation efforts. Any plans that the project is stated to be in support of must be documented in the proposal.
- 7) **Project Manageability: Up to 5 points.** This section refers to the condition of the project area and any additional management that will be incurred that will hinder the project. In order to be awarded the maximum allowable points, the site must be in outstanding condition and will take little to no work to maintain status. Evaluation would include the current use and condition, proposed use, surrounding area impacts, invasive species management, restoration requirements, or any environmental remediation required.
- 8) **Long-Term Use: Up to 5 points.** Project areas will be evaluated on any surrounding threats to the area. In order to receive the maximum allowable points, the surrounding areas would be compatible with the project's primary goal. Also taken into consideration would be management over the life of the project (perpetuity) and any complications that might affect the project's goal.
- 9) **Threat of Conversion: Up to 5 points.** Project areas with imminent threat of conversion to uses that would be in direct conflict with the area's features would receive the maximum allowable points. For other levels of threat, points would be awarded depending on the degree of threat e.g. likely, possible, unlikely, none.
- 10) **Acquisition Ability: Up to 5 points.** Applicants should demonstrate their legal authority to acquire land, personnel, and expertise in land acquisition either directly or through a partner organization. The applicant should give examples of previous successful conservation acquisitions to be awarded the maximum points.
- 11) **Managerial Capacity: Up to 5 points.** Applicants should demonstrate their organizational capacity to manage conservation lands. Ideally, applicants would have dedicated funding, personnel, and expertise to manage conservation land or have partnered with an organization that does. The applicant or partner should demonstrate other successfully managed areas with the primary goal of conservation.
- 12) **Project Readiness: Up to 5 points.** Awarded points will be based upon the stage of negotiations and ease of acquisition of the project area. Points will be awarded dependent upon having a defined project area and match area if applicable; stage of discussion with the landowner with supporting documentation (e.g., evidence of a willing seller); clear title not subject to litigation, liens, or judgments; and any environmental contamination issues addressed.

- 13) **Project Costs: Up to 15 points.** The project's budget should be clear, defined, realistic, and commensurate with the project area and timeframe. Project cost should be based on a current independent appraisal or other assessment of fair market value; clearly state the source of the non-Federal match; display the availability of the matching source within performance period; list other costs related to acquisition that have already been expended; list other administrative costs that are to be charged to the grant or used as in-kind services. Should the CELCP funds only be for a portion of a larger tract, the applicant should clearly define what area the funds would acquire and is the project still viable if the other funding sources do not become available during the performance period.
  
- 14) **Sapelo Island National Estuarine Research Reserve (SINERR): Up to 5 points.** Projects will be evaluated based on the degree the project area will benefit and protect the SINERR.



## Appendix A



**Public Recreational and Commercial Shellfish Harvest Areas in Georgia, 2010**

- Legend**
- Commercial
  - Public Recreational

For more information call the DNR CRD Shellfish Sanitation Program at 912.264.7218



## **Appendix B**



MARK WILLIAMS  
COMMISSIONER

A.G. 'SPUD' WOODWARD  
DIRECTOR

September 15, 2011

Ms. Jill Andrews  
GaDNR Coastal Resources Division  
One Conservation Way, Ste 300  
Brunswick, Georgia 31520

RE: Consistency Certification of NOAA Grant CFDC# 11.419: CELP Plan, Georgia

Dear Ms. Andrews:

Staff of the Coastal Management Program has reviewed your September 14, 2011 e-mail and attached Georgia Coastal and Estuarine Land Conservation Program (GA CELP) Plan. The GA CELCP Plan identifies conservation priorities for land acquisition that tailors the national program to the State's coastal conservation needs. Georgia's Plan also gives clear guidance for the nomination and selection of land conservation projects within the State's coastal boundary.

The Program concurs with your consistency determination. This determination ensures that the proposed project has been designed to comply to the maximum extent practicable with the applicable enforceable policies of the Georgia Coastal Management Program.

Please feel free to contact Kelie Moore or me if we can be of further assistance.

Sincerely,

A.G. "Spud" Woodward  
Director

SW/km