



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL OCEAN SERVICE  
OFFICE OF OCEAN AND COASTAL RESOURCE MANAGEMENT  
Silver Spring, Maryland 20910

Commissioner Mark Williams  
Georgia Department of Natural Resources  
Commissioner's Office  
2 Martin Luther King, Jr. Drive, S.E., Suite 1252  
East Tower  
Atlanta, Georgia 30334

**MAR 02 2012**

Dear Commissioner Williams:

Enclosed are the final evaluation findings for Georgia's Coastal Management Program for the period from December, 2005, to May, 2011.

The fundamental conclusion of this evaluation is that Georgia is adhering to the programmatic requirements of the Coastal Zone Management Act in implementing the federally-approved Georgia Coastal Management Program. This evaluation findings document includes seven recommendations, one of which is a necessary action related to Georgia's conditionally approved Coastal Nonpoint Program.

We appreciated the cooperation and assistance of your staff during the evaluation.

Sincerely,

Donna Wieting  
Acting Director

Enclosure

cc: Brad Gane, Assistant Director, Ecological Services  
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**EVALUATION FINDINGS**  
**FOR THE**  
**GEORGIA COASTAL MANAGEMENT PROGRAM**  
**DECEMBER 2005 - MAY 2011**

**February 2012**

Office of Ocean and Coastal Resource Management  
National Ocean Service  
National Oceanic and Atmospheric Administration  
United States Department of Commerce



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## I. EXECUTIVE SUMMARY

Section (§) 312 of the Coastal Zone Management Act (CZMA) of 1972, as amended, requires NOAA's Office of Ocean and Coastal Resource Management (OCRM) to conduct periodic evaluations of the performance of states and territories with federally-approved coastal management programs. This review examined the operation and management of the Georgia Coastal Management Program (GCMP) by the Georgia Department of Natural Resources, the designated lead agency, for the period from December 2005 through May 2011.

This document describes the evaluation findings of the Director of NOAA's OCRM with respect to GCMP during the review period. These evaluation findings include discussions of major accomplishments as well as recommendations for program improvement. The evaluation concludes that the Department of Natural Resources (DNR) is successfully implementing and enforcing its federally-approved coastal management program, adhering to the terms of the Federal financial assistance awards, and addressing the coastal management needs identified in section 303(2)(A) through (K) of the CZMA.

Overall, OCRM finds the GCMP continues to demonstrate progress in addressing coastal management issues through successful coordination and collaboration with both governmental and non-governmental partners. Georgia continues to successfully balance a regulatory permit program with technical assistance to coastal communities and research support for the scientific community. Staff relationships with partners are outstanding, and their technical assistance is highly valued. The evaluation team consistently heard the staff are the "go to" people for coastal management issues.

The Georgia Coastal Management Act sunset clause was repealed 2008 and core authorities have been improved via new rules for the Coastal Marshlands Protection Act. A compliance and enforcement program was developed during the review period, and program suggestions include addressing compliance and enforcement staff needs and the related issue of timely legal assistance. In addition, the DNR should play a facilitation role in State agency review of saltmarsh mitigation banks and explore other means and internal programs to foster saltmarsh wetland mitigation on the Georgia coast.

Coastal communities are utilizing the Coastal Incentive Grants (CIG) as "seed" funding to leverage additional public and private funding for projects which revitalize waterfronts, enhance public access and promote community planning. The GCMP is continuing to provide highly valued technical assistance to local governments, and the GCMP should identify and evaluate opportunities and resources to further develop this part of the program.

The one necessary action identified is: "GA DNR must work with NOAA OCRM to develop and submit to OCRM by September 30, 2012, a work plan with interim benchmarks and a time line for meeting the outstanding conditions of its conditionally approved coastal nonpoint program. The documentation indicating how GA met the outstanding conditions must be submitted to NOAA OCRM no later than May 31, 2016."

## II. PROGRAM REVIEW PROCEDURES

### A. OVERVIEW

The National Oceanic and Atmospheric Administration (NOAA) began its review of the GCMP in July, 2010. The §312 evaluation process involves four distinct components:

- An initial document review and identification of specific issues of particular concern;
- A site visit to Georgia, including interviews and public meetings;
- Development of draft evaluation findings; and
- 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.

The recommendations made by this evaluation appear in boxes and bold type and follow the findings section where facts relevant to the recommendation are discussed. The recommendations may be of two types:

**Necessary Actions** address programmatic requirements of the CZMA's implementing regulations and of the GCMP approved by NOAA. These must be carried out by the date(s) specified;

**Program Suggestions** denote actions that the OCRM believes would improve the program, but which are not mandatory at this time. If no dates are indicated, the state is expected to have considered these Program Suggestions by the time of the next CZMA §312 evaluation.

A complete summary of accomplishments and recommendations are outlined in Appendix A.

Failure to address Necessary Actions may result in future finding of non-adherence and the invoking of interim sanctions, as specified in CZMA §312(c). Program Suggestions that are reiterated in consecutive evaluations to address continuing problems may be elevated to Necessary Actions. The findings in this evaluation document will be considered by NOAA in making future financial award decisions relative to the GCMP.

### B. DOCUMENT REVIEW AND ISSUES DEVELOPMENT

The evaluation team reviewed a wide variety of documents prior to the site visit, including: (1) 2005 GCMP §312 evaluation findings; (2) federally approved Environmental Impact Statement and program documents; (3) financial assistance awards and work products; (4) semi-annual

performance reports; (5) official correspondence; and (6) relevant publications on natural resource management issues in Georgia.

Based on this review and on discussions with NOAA's Office of Ocean and Coastal Resource Management (OCRM), the evaluation team identified the following priority issues:

- *Program accomplishments since the last evaluation;*
- *The effectiveness of the state in implementing, monitoring and enforcing the core authorities that form the legal basis for the CMP;*
- *Implementation of the Federal Consistency process, including adherence to procedural requirements;*
- *The manner in which GCMP has addressed the recommendations contained in the §312 evaluation findings released in 2005. The GCMP's assessment of how it has responded to each of the recommendations in 2005 evaluation findings is located in Appendix B.*

### **C. SITE VISIT TO GEORGIA**

Notification of the scheduled evaluation was sent to the Department of Natural Resources, the Georgia Coastal Management Program, relevant environmental agencies, members of Georgia's congressional delegation and regional newspapers. In addition, a notice of NOAA's "Intent to Evaluate" was published in the *Federal Register* on March 16, 2011.

The site visit to Georgia was conducted on May 23-27, 2011. The evaluation team consisted of Kenneth Walker, Program Analyst, National Policy and Evaluation Division; Sarah van der Schalie, Program Specialist, Coastal Programs Division; and Jeffrey Willis, Deputy Director, Rhode Island Coastal Resources Management Council.

During the site visit, the evaluation team met with federal and state agencies, local officials, academicians, and non-governmental organizations. Appendix C lists people and institutions contacted during this review.

As required by the CZMA, NOAA held an advertised public meeting on May 25, 2011 at 5:30 at the Shipman Environmental Learning Center, One Conservation Way, Brunswick, GA 31520. The public meeting gave members of the general public the opportunity to express their opinions about the overall operation and management of GCMP. Appendix D lists individuals who registered at the meeting. NOAA's response to written comments submitted during this review is summarized in Appendix E.

The GCMP staff members provided essential support in setting up meetings and arranging logistics for the evaluation site visit, in addition to providing the evaluation team with needed program information before, during, and after the site visit. The evaluation team greatly appreciated their assistance and active participation.

### III. COASTAL MANAGEMENT PROGRAM DESCRIPTION

The State of Georgia initiated development of the Georgia Coastal Management Program (GCMP or coastal program) in 1992 and the GCMP was approved by NOAA in 1998. The Georgia General Assembly authorized the GCMP in April 1997 through the passage of the Georgia Coastal Management Act (O.C.G.A. 12-5-320 et seq) and designated the Georgia Department of Natural Resources, Coastal Resources Division, as the lead agency for administering the GCMP. 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 permits, licenses and assistance; and coordinate among the networked agencies. EES also issues permits under its purview and 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 Authority

Agencies networked through memoranda of agreement are:

Department of Natural Resources (Division 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

## IV. REVIEW FINDINGS, ACCOMPLISHMENTS, AND RECOMMENDATIONS

### A. OPERATIONS AND MANAGEMENT

#### 1. Organization and Administration

In 2008, the Georgia General Assembly repealed a sunset clause within the Georgia Coastal Management Act (O.C.G.A. 12-5-329) that effectively reauthorized the program indefinitely. This successful reauthorization of the core authorities and permanent removal of the sunset provision speaks to the support the GCMP has garnered for its programs and authorities. It also speaks to the maturity of the program and public understanding of both the regulatory and planning functions of the GCMP.

Accomplishment: The GCMP is to be commended on the 2008 repeal of the Georgia Coastal Management Act sunset clause.

Coastal Advisory Council (CAC) members represent a diverse cross-section of coastal stakeholders including state and regional agencies; local governments; environmental organizations; research scientists; and citizens-at-large. The CAC has three main roles: serving as a forum for information sharing, setting funding themes for the Coastal Incentive Grant Program (CIG), and providing the GCMP with feedback and advice. During the stakeholder meetings, participants noted that the organization of the CAC and the CIG process have continued to improve since the last evaluation period. In addition, participants often noted how much they appreciate the information sharing that occurs between the GCMP, researchers, the CAC members, and associated stakeholders. Using the CAC as a forum for outreach and education is an effective communication approach that is valued by CAC members.

During a number of the stakeholder meetings, participants suggested that the GCMP clarify the CAC's role as an advisory body. Many of the people we interviewed felt that it was unclear what role the Council members had in an advisory capacity. What were they providing advice on and for what purpose? They suggested that the GCMP determine the most effective way to utilize the CAC on this topic. In addition to clarifying the roles of the CAC, additional suggestions for the GCMP and CAC included: (1) continuing to encourage local governments to participate; (2) asking CIG recipients to present on their completed work; (3) having members share current issues occurring in different locations along the coast; and (4) adding more academic leaders from universities not already represented.

During conversations with the GCMP staff about the CAC's advisory role, staff noted that they had been working with the CAC on clarifying the advisory role set forth in the bylaws, but that they could continue to work on this. Given the large number of people attending the CAC meetings, we also discussed whether a professional facilitator might be helpful in running the CAC meetings.



Program Suggestion: GCMP staff should continue to clarify the advisory role for the CAC to assure their fullest potential use.

## **B. PUBLIC ACCESS**

Georgia has approximately 100 miles of oceanfront shoreline and 3,650 miles of tidal creek and riverine shoreline. Coastal Georgia is fortunate to have leaders with foresight, generous landowners and an economy based around access to the water. The result is many barrier islands are conserved, river corridors are being protected, and public access to the coast is being enhanced. The GCMP continues to support local partners' efforts to enhance public access and access facilities along the coast.

The Coastal Incentive Grants (CIG) are often used to provide funds for communities to plan, design and implement coastal access enhancements. Many of these access projects also include an educational component and habitat enhancements. An example from the review period is the Georgia Saltwater Paddling Trail, which has been a regional effort to provide a coastal route for the paddling community. This effort has been successful in linking these communities by water, promoting ecotourism, and increasing recreational opportunities in the region. This effort has spurred communities such as Darien and St Marys to create access points and facilities to better position themselves for tourism opportunities. A full discussion of the CIG is found under Section F: Coastal Dependent Uses and Community Development.

In addition, staff provides technical assistance to communities, and one staff focuses on public access and land conservation issues. This assistance is highly valued by all the community members the evaluation team met with. Technical assistance is discussed under Section G: Technical Assistance.

## **C. COASTAL HABITAT**

The GCMP implements permitting authorities, including enforcement, under the Coastal Marshlands Protection and Shore Protection Act, issues Revocable Licenses for the use of State coastal water bottoms. During the review period, new rules were developed and implemented to address community docks and marinas and upland components of projects permitted through the Coastal Marshlands Protection Act. The GCMP convened an upland stakeholders group and a community docks and marinas group to develop and make recommendations on the new rules related permitting of community docks and marinas and upland components of projects.

Since 2005, forty-three percent of applications coming before the Coastal Marshlands Protection Committee have involved marinas and/or community docks. The Committee has, through time, established trends in the conditions they apply to these types of permits regarding siting, size and design standards; however, there were no formalized standards for these structures. Recognizing

the need for such standards, the Committee tasked the GCMP in 2005 to engage a stakeholders' dialogue to examine permitting practices for marinas and community docks, and to propose standards or rules for permitting these types of projects while also accommodating the uniqueness of each application.

An Upland Stakeholders Committee was convened in 2006 by the Board of Natural Resources to develop recommendations for stormwater management, impervious cover, and buffer design and maintenance practices for upland components of projects subject to permitting under the CMPA. The Stakeholders' recommendations were reflected in the new rules drafted by the GCMP and presented to the DNR Board for adoption. In February 2007, the new coastal marshlands protection rules were passed, calling for more stringent stormwater management measures, a fifty-foot buffer on coastal marshlands, and limitations on effective impervious cover on upland project components.

The evaluation team heard this was a model process, which brought together a variety of stakeholders (including developers and environmentalists) which may be valuable in future rule making processes. The new rules have also provided a more predictable permitting process for the development community.

Accomplishment: Improvements to the Coastal Marshlands Protection Act rules have resulted in a more predictable permitting process for the development community.
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Saltmarsh is a significant coastal resource, providing habitat and nursery area, water quality enhancements, storm surge protection, floodwater storage capacity, and import and export of primary food sources to support coastal fauna including many species of commercial and recreational importance. Saltmarsh in Georgia stretches in a band four to six miles wide between the mainland and coastal barrier islands. The evaluation team heard that currently the State is missing out on potential opportunities for saltmarsh mitigation banking, and saltmarsh is inevitably adversely impacted by some permitted activities. Recognizing that there is a greater need for mitigation banking on the coast, that the State is the Trustee of most submerged lands, and that there exist yet unresolved legal issues that are slowing the development of mitigation banks on state lands, the State needs to take a greater facilitation role in saltmarsh mitigation banking. This builds on the GCMP's role as a facilitator in bringing together partners around coastal issues. It is appropriate for the state's coastal management program to not only participate in the US Army Corps of Engineers' sponsored Interagency Review Team to evaluate coastal wetland mitigation bank proposals, but to facilitate broader State agency review and to explore other means and internal programs to foster saltmarsh wetland mitigation on the Georgia coast.

Program Suggestion: GA DNR should play a facilitation role in State agency review of saltmarsh mitigation banks and explore other means and internal programs to foster saltmarsh wetland mitigation on the Georgia coast.

#### ***D. WATER QUALITY***

##### **Georgia's Coastal Nonpoint Source Program**

Georgia's Coastal Nonpoint Source (NPS) Program is housed within the Environmental Protection Division (EPD) and receives funding from the GCMP Section 310 and EPD's Section 319 Program. Georgia's Program is a national model for coordination between Coastal and 319 Statewide Nonpoint Source, with millions of 319 dollars directed during the evaluation period to lifting the Coastal NPS conditions with an array of projects benefitting coastal resources. The Coastal Nonpoint Source Program focuses on building local government capacity to promote sustainable growth techniques, and coordinates with existing nonpoint source programs conducted by various agencies to assess their effectiveness and implement management measures in areas where improvements are needed. To facilitate this coordination, the Coastal Nonpoint Source Program established a Nonpoint Source Advisory Committee comprised of State and local partners working on nonpoint source issues.

In accordance with Section 6217(g) of the Coastal Zone Act Reauthorization Amendments of 1990 (CZARA), to the federal Coastal Zone Management Act, all states with federally approved coastal zone management programs must develop corollary comprehensive coastal nonpoint pollution control programs. These programs must be developed and implemented in accordance with guidance by the National Oceanic and Atmospheric Administration (NOAA) and the US Environmental Protection Agency (EPA). The State of Georgia initially submitted Program documentation in 2001. The National Oceanic and Atmospheric Administration (NOAA) and the U.S. Environmental Protection Agency (EPA) reviewed the information and evaluated the extent to which Georgia's program conforms with the requirements of CZARA. In June 2002, NOAA and EPA issued Findings and Conditions for Georgia's Coastal Nonpoint Program, which specified conditions for full program approval. Several of these conditions for Georgia and other states were administratively waived as a result of the implementation of Phase II, National Pollution Discharge Elimination System.

Georgia has made significant progress on development of their Coastal Nonpoint Program, and the State is actively working with federal partners to assure full approval of their Coastal Nonpoint Pollution Program. Georgia has submitted draft documents for all of the nonpoint categories for review, questions, and revisions and the collaborative process is ongoing. Coastal nonpoint accomplishments include meeting the management measures for hydromodification, with pending approval of the Program Boundary and New Development Management Measure, 401 Water Quality certification enhancements (including increased staffing), the Coastal Stormwater Supplement to Georgia Stormwater Management manual, and the Green Growth Guidelines and corollary model ordinances.

During the site visit, the evaluation team heard firsthand from stakeholders about the value of the Coastal Stormwater Supplement and how its development was a very large collaborative effort. The Coastal Nonpoint Source (NPS) and Statewide NPS Program contracted with the Center for Watershed Protection (CWP) and the Chatham County-Savannah Metropolitan Planning Commission to develop the Coastal Stormwater Supplement to the Georgia Stormwater Management Manual with extensive stakeholder involvement throughout the entire process. The project included research on coastal stormwater best management practice (BMP) performance, development of the Supplement, stormwater model ordinance, and monitoring protocols for determining effectiveness of the BMPs. The Coastal Stormwater Supplement establishes runoff-reduction design criteria through Green Infrastructure performance standards that incorporate a combination of natural resources protection, better site planning and design and low impact development practices and meets many required management measures using an innovative approach. Georgia received a Governor's Service Award in 2009 for this work.

The Green Growth Guidelines have also been a success. In response to the need for innovative tools to manage growth on the Georgia coast, the GCMP funded the development of the "Green Growth Guidelines." The Green Growth Guidelines serve as a practical guide to designing with the coastal landscape utilizing techniques such as site fingerprinting, low impact development practices for stormwater, and bank stabilization techniques. Intended for developers, engineers, land planners, local governments, natural resource managers, and citizens, the Guidelines provide design specifications for a variety of low impact techniques as well as a discussion of the economic benefits of conservation development. The GCMP, Coastal and Statewide Nonpoint Source Programs are continually working to update the Guidelines with the latest relevant sustainability concepts and have made the Green Growth Guidelines available to every coastal county and municipality, the coastal development community, and have distributed many copies nationwide.

Accomplishment: GA has made much progress in developing their Coastal Nonpoint Program, has met hydromodification conditions, and launched significant initiatives to protect coastal habitats, wildlife and waters, including 401 water quality certification enhancements and staffing, the Coastal Stormwater Supplement to the Georgia Stormwater Manual, and the Green Growth Guidelines.

At the time of the site visit, twelve out of 34 states with NOAA-approved coastal management programs had conditionally approved coastal nonpoint programs. Under the Coastal Zone Act Reauthorization Amendments (CZARA), the presence of remaining conditions makes a state's coastal nonpoint program non-approvable. CZARA outlines severe financial penalties for states with NOAA-approved coastal zone management programs through withholding up to 30 percent of CZMA Section 306 funds and Clean Water Act Section 319 funds each year a state has failed to submit an approvable program. NOAA and EPA continued to encourage support conditionally approved coastal nonpoint programs to satisfy their remaining conditions and achieve their final approval, without levying financial penalties. Subsequently a recently settled lawsuit involving NOAA, EPA and the Oregon coastal nonpoint program, NOAA and EPA

mutually agreed to establish reasonable dates for each conditionally approved state to submit a request for final approval. A state will incur financial penalties as specified in CZARA for failing to submit an approvable program by a specified date. NOAA and EPA established “submission by” dates for Oregon and Washington, and agreed to establish “submission by” dates for the ten other conditionally approved states no later than the issuance of those state’s next 312 evaluation findings.

Necessary Action: GA DNR must work with NOAA OCRM to develop and submit to OCRM by September 30, 2012, a work plan with interim benchmarks and a timeline for meeting the outstanding conditions of its conditionally approved coastal nonpoint program. The documentation indicating how GA met the outstanding conditions must be submitted to NOAA OCRM no later than May 31, 2016.

In addition to the program’s accomplishments, staff also described communication challenges that arise from the current programmatic organizational structure and physical distance between staff; the NPS staff are under GA DNR’s EPD whereas the majority of the GCMP staff are located within GA DNR’s Coastal Resources Division. In order to meet this Necessary Action, staff working on the NPS program are going to need the full support from management at all levels within both CRD and EPD. As noted in the paragraph above, CZARA penalties potentially impact funding for programs in both Divisions.

Program Suggestion: GCMP and NPS staff should identify ways to improve communication to management at all levels within CRD and EPD in order to gain support for the Coastal Nonpoint Program.

## **E. COASTAL HAZARDS**

The GCMP has three staff who provide technical assistance to local governments, and they have developed specializations in coastal hazards, public access and land conservation, and sustainable development. The specialists organize and provide direct technical assistance, workshops, and training for local governments, and comment on projects reviewed by the Coastal Regional Commission of Georgia.

An example of this technical assistance on coastal hazards from the review period was the “Roadmap for Adapting to Coastal Risk” workshop for the Chatham County/Savannah region, organized by GCMP technical assistance staff and provided by NOAA’s Coastal Services Center. The evaluation team repeatedly heard this workshop was a great success. The workshop brought a diverse group of stakeholders together and helped a local community create a roadmap for the next steps to address sea level rise. The workshop has translated to action, as the local government is moving forward with updating zoning ordinances to address sea level rise. In

particular, the GCMP was instrumental in using their local contacts to make sure the relevant local stakeholders were at the table for this workshop.

A program suggestion related to staff technical assistance is included in Section G: Technical Assistance.

## **F. COASTAL DEPENDENT USES AND COMMUNITY DEVELOPMENT**

Every year, the GCMP allocates fifty to sixty percent of its federal funding, approximately \$1.1 million, to local governments, research institutions, and state and regional agencies in the form of Coastal Incentive Grants (CIG) for projects that promote the understanding, protection or enhancement of coastal natural and historic resources. Since 2005, the CIG program has awarded over \$6,908,000 to local governments, research institutions and other state agencies. In the 13 years since the CIG program was initiated, the GCMP has distributed over \$13,500,000, which has been leveraged by at least that amount in state and local match funds, totaling over \$27,000,000. In August 2006, the GCMP sent out over sixteen hundred “Performance Surveys” to coastal stakeholders and citizens asking them to rate their level of familiarity and satisfaction with the suite of Coastal Program activities. The Performance Survey results expressed that respondents were most satisfied with the GCMP’s CIG Program.

The stakeholders that the evaluation team met with during the evaluation period expressed overwhelming support for the CIG Program. They noted how it fills a “unique niche” in providing funding for research on coastal issues and to local governments for planning and project implementation. One researcher noted that the program is very nimble and flexible, and allows the GCMP to direct funds to needed research. The GCMP has also successfully linked their regulatory program with their funded research activities through the CIG to address management needs (such as marsh die back research completed by the Georgia Coastal Research Council). A local government staff member also noted that the CIG program operationalizes comprehensive plans in a way that the local community would not otherwise be able to do.

The partners that the evaluation team interviewed also spoke very highly of the GCMP staff running the CIG program – noting that the staff were very approachable and that their workshops were very helpful. Throughout the site visit, the evaluation team was also able to view and learn about numerous CIG projects. These projects demonstrated how the CIG grants can be used to: complete and share needed research that will inform policy and management; assist local communities in protecting their coastal resources, providing access, revitalizing their waterfronts and economies; and improve regional planning and capacity.

In Darien, the community has utilized the CIG program for updating their comprehensive plan. After development of the plan, the community received funds to implement components of the plan to preserve their working waterfront and enhance access to the waterfront. These enhancements have included a master plan for Darien’s waterfront park, a multi-use trail, and interpretative signage that explains the ecological value of coastal resources. Today, an active shrimping fleet, new docks and boardwalks, enhanced signage and waterfront park improvements are all community assets which enhance the maritime heritage of the waterfront.

Darien is also planning an eco-tourism and birding visitor's center and a stop on the Georgia Saltwater Paddling Trail. Darien has successfully leverage \$130K in CIG planning grants with an additional \$6-7 million in public and private investment.

During the review period, the GCMP has made improvements related to the CIG themes and criteria, and staff have seen an increase in the quality of applications. The evaluation team consistently heard about the value of CZM funds to initiate these waterfront revitalization and planning efforts, and how these funds are serving as “seed” money to leverage additional public and private investment. In particular, the planning funds are highly valued (there are limited State funds for planning) and have leveraged additional investment.

CIG funds dedicated to research for directed projects continues to be an important mechanism for Georgia to address coastal management needs and issues. For example, during the review period, the Coastal Water Quality indicators project compiled existing water quality data into one database and analyzed for trends. A recent directed project enabled the acquisition of LiDAR and encouraged local governments to use this dataset. GCMP staff should consider creating a way to consistently track the impact of directed and competitive CIG funded research on management.

Stakeholders also provided suggestions to improve the effectiveness of the program including: (1) identify ways to continue to improve the theme setting process; (2) evaluate the possibility of creating more directed projects; (3) increase diversity of universities and colleges submitting proposals; (4) encourage more local communities to apply for funds and target small and rural communities in outreach efforts; and (5) review the percentage of funded research projects and evaluate whether that percentage should be decreased.

Staff are also supportive of continuing to improve the theme setting process; however, they noted that the themes are set by the CAC and further refinement is a challenge as the CAC is a large group with many ideas and priorities to reconcile.

Accomplishment: The GCMP has made Coastal Incentive Grant improvements related to themes, criteria and quality of applications. GCMP “seed” funding for local projects to enhance public access, revitalize urban waterfronts, and plan for future growth is allowing coastal communities to leverage significant additional public and private funding for implementation of these projects.
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GCMP staff were also supportive of encouraging more local communities to submit project proposals; however, they are unsure of how to accomplish this. They already conduct extensive outreach and they encounter a number of challenges (e.g. lack of capacity, time, match funding, etc.). The evaluation team heard the CIG projects are also helping to build capacity at the local level, particularly for several small and rural coastal communities. GCMP staff should continue to assess the barriers (real or perceived) that prevent local communities from submitting successful proposals, and should identify ways to remove or help local communities overcome those barriers.

## **G. Technical Assistance**

In 2009, the Technical Assistance Program adopted a new approach to providing technical assistance to communities. The GCMP has three staff that provide technical assistance to local governments, and they have developed specializations in coastal hazards, public access and land conservation, and sustainable development. During the site visit, the specialists were consistently described as invaluable to the program. Stakeholders noted that the specialists were always available and willing to help, they had effectively built relationships with local governments, and they were great communicators of useful and relevant information. Given all of the positive work they do, one group of stakeholders interviewed recommended that the program do more to promote the specialists work and the program's products.

Accomplishment: The GCMP is continuing to provide highly valued technical assistance to local governments on coastal hazards issues, public access and land acquisition, and sustainable development.

Program Suggestion: The GCMP specialists provide invaluable support to local governments and communities. The GCMP should identify and evaluate opportunities and resources to further develop this part of the program.

## **H. GOVERNMENT COORDINATION AND DECISION-MAKING**

### **1. Programmatic Coordination**

A Compliance and Enforcement Program for the Marshlands Protection and Shore Protection Act was developed using CZM 309 funds over the review period. The GCMP's Compliance and Enforcement Program enforces the Coastal Marshlands Protection Act, Shore Protection Act, and Revocable License authority along the entire coast of Georgia and up to approximately fifty-five miles inland. GCMP staff review each permit application to ensure that all documents are legal and correct. Staff also monitor all Marina Lease agreements.

The Compliance and Enforcement Program conducts routine compliance inspections of all Coastal Marshlands Protection Committee permitted projects to ensure that structures were constructed as approved by the Committee. Should these projects not meet the standards required by the Committee, corrective action is taken to bring the facility or structure into compliance. GCMP staff investigates various alleged violations of the Coastal Marshlands Protection Act. These include any unauthorized dredging, filling, excavating, placement of an unauthorized



structure, or altering of the marsh. Some of the most common violations are unauthorized removal of marsh, fill of jurisdictional wetlands, and vehicular operation in the marsh.

The GA CMP staff also shared a number of challenges for the regulatory program, which included: (1) proliferation of unpermitted individual docks; (2) lack of sufficient numbers of compliance staff; and (3) obtaining access to timely legal advice on compliance and enforcement issues.

The Evaluation team heard that much progress has been made to address unpermitted development, but that much more enforcement work is needed. For example, the team repeatedly heard about an increasing number of unpermitted docks in the coastal zone, and dock builders who build unpermitted structures. NOAA is concerned that the current staff of two cannot keep up with the on-the-ground needs in coastal Georgia.

A related issue, the evaluation team understands that in order to obtain legal guidance GCMP staff must go through a structured referral process to the Department of Law. NOAA recommends that GA continue to further develop the Compliance and Enforcement program, examine staffing needs and explore how to obtain timely and responsive legal advice.

Program Suggestion: NOAA recommends that GA continue to further develop the Compliance and Enforcement program, looking at staffing needs and how to obtain timely and responsive legal advice.

## **2. Partnerships**

Throughout the site-visit interviews, the evaluation team heard about a number of productive and beneficial partnerships from a variety of partners including the Sapelo Island NERR, the Georgia Coastal Research Council, the Coastal Regional Commission of Georgia, and the Coastal Georgia Land Conservation Initiative. Each of these partnerships serves a different role and leverages resources to further the goals of the GCMP program.

Staff relationships with partners are outstanding. The evaluation team heard the same message consistently from the scientific and research community, Federal and state partners, local and regional governments, and NGOs, which was that GCMP staff are the “go to” people for coastal issues, and if the staff do not have the answer to a question, they follow through by providing the appropriate knowledgeable contact. The staffs are professional, accessible, and highly respected. During the site visit, it was obvious to the evaluation team that the GCMP staff members are well respected. State and local officials as well as representatives of non-governmental organizations were complimentary about the staff’s accessibility and knowledge, and local partners appreciate the staff specializations.

Accomplishment: Staff relationships with partners are outstanding. Staffs are seen as the “go to” people for coastal issues and staff specializations are appreciated by local partners.

### 3. Education and Outreach

The GCMP is very active in education and outreach targeting local governments, the general public, school groups and community organizations. Many of these activities are accomplished through the work of the GCMP’s Coastal Resources Specialists. The GCMP also relies on a number of partners to support their education and outreach efforts.

For example, the GCMP partnered with the Bryan County Tree Foundation, Sapelo Island National Estuarine Research Reserve and University of Georgia to host a workshop series entitled “Saving Money Through Smart Growth“. The workshops illustrated the basic concepts, costs, and benefits of Low Impact Development (LID) strategies to local decision makers, and demonstrated to developers, engineers, land planners and landscape architects that LID is a feasible alternative to traditional stormwater management practices. In addition, the GCMP and partners organized a “Planning for Quality Growth” workshop for McIntosh County and the City of Darien. The workshop focused on planning for future growth and the impacts that may result from unplanned growth. Two follow-up workshops focused on Erosion and Sedimentation and Low Impact Development. The workshops helped spur these coastal local governments into considering new policies and ordinances to manage growth in areas adjacent to sensitive coastal resources.

In addition, Georgia’s CoastFest! is a major education and outreach effort for the GCMP. Held on the grounds of the Brunswick DNR, this event brings together over 80 environmental, educational research and resource exhibitors and builds public awareness of environmental issues in coastal Georgia.

Accomplishment: The GCMP is continuing to provide valuable education and outreach on coastal issues to local governments, school groups, community organizations and the general public.

During the site visit, the evaluation team did hear that there might be additional opportunities to expand public knowledge of the program. In particular, there is a need to target local decision-makers in small and rural coastal communities.

Program Suggestion: The GCMP should expand public knowledge of program, possibly targeting rural and small communities, city councils, and county commissioners.

## V. CONCLUSION

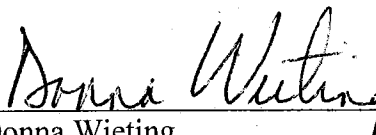
For the reasons stated herein, I find that Georgia is adhering to the programmatic requirements of the Coastal Zone Management Act and its implementing regulations in the operation of its approved CZMP.

The Georgia Coastal Management Program has made notable progress in the following areas: operations and management, public access, coastal habitat, water quality, coastal hazards, coastal dependent uses and community development, technical assistance, programmatic coordination and partnerships.

These evaluation findings also contain seven (7) recommendations. The recommendations are in the form of one (1) Necessary Actions and six (6) Program Suggestions. The State must address the Necessary Actions by the dates indicated. The Necessary Action requires GA DNR to work with NOAA OCRM to develop and submit to OCRM by September 30, 2012, a work plan with interim benchmarks and a time line for meeting the outstanding conditions of its conditionally approved coastal nonpoint program. The documentation indicating how GA met the outstanding conditions must be submitted to NOAA OCRM no later than May 31, 2016.

The Program Suggestions should be addressed before the next regularly scheduled program evaluation, but they are not mandatory at this time. Program Suggestions that must be repeated in subsequent evaluations may be elevated to Necessary Actions. Summary tables of program accomplishments and recommendations are provided in section VI.

This is a programmatic evaluation of the GCMP that may have implications regarding the state's financial assistance awards. However, it does not make any judgment about or replace any financial audits.

  
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Donna Wieting  
Director, Office of Ocean and Coastal  
Resource Management

March 2 2012  
Date

## VI. APPENDICES

### Appendix A. OCRM Summary of Accomplishments and Recommendations

Issue Area	Accomplishment
Operations and Management	The GCMP is to be commended on the 2008 repeal of the GA Coastal Management Act sunset clause.
Coastal Habitat	Improvements to the Coastal Marshlands Protection Act rules have resulted in a more predictable permitting process for the development community.
Water Quality	GA has made much progress in developing their Coastal Nonpoint Program, has met hydromodification conditions, and launched significant initiatives to protect coastal habitats, wildlife and waters, including 401 water quality certification enhancements and staffing, the Coastal Stormwater Supplement to the Georgia Stormwater Manual, and the Green Growth Guidelines.
Technical Assistance	The GCMP is continuing to provide highly valued technical assistance to local governments on coastal hazards issues, public access and land acquisition, and sustainable development.
Coastal Dependent Uses & Community Development	The GCMP has made Coastal Incentive Grant improvements related to themes, criteria and quality of applications. GCMP “seed” funding for local projects to enhance public access, revitalize urban waterfronts, and plan for future growth is allowing coastal communities to leverage significant additional public and private funding for implementation of these projects.
Programmatic Coordination & Partnerships	Staff relationships with partners are outstanding. Staffs are seen as the “go to” people for coastal issues and local partners appreciate staff specializations.
Education & Outreach	The GCMP is continuing to provide valuable education and outreach on coastal issues to local governments, school groups, community organizations and the general public.

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 Necessary Actions and Program Suggestions. Areas for improvement include:

<b>Issue Area</b>	<b>Recommendation</b>
Organization and Administration	PROGRAM SUGGESTION: GCMP staff should continue to clarify the advisory role for the CAC to assure their fullest potential use.
Habitat	PROGRAM SUGGESTION: GA DNR should play a facilitation role in State agency review of saltmarsh mitigation banks and explore other means and internal programs to foster saltmarsh wetland mitigation on the Georgia coast.
Water Quality	NECESSARY ACTION: GA DNR must work with NOAA OCRM to develop and submit to OCRM by September 30, 2012, a work plan with interim benchmarks and a time line for meeting the outstanding conditions of its conditionally approved coastal nonpoint program. The documentation indicating how GA met the outstanding conditions must be submitted to NOAA OCRM no later than May 31, 2016.
Water Quality	PROGRAM SUGGESTION: GCMP and NPS staff should identify ways to improve communication to management at all levels within CRD and EPD in order to gain support for the Coastal Nonpoint Program.
Technical Assistance	PROGRAM SUGGESTION: The GCMP specialists provide invaluable support to local governments and communities. The GCMP should identify and evaluate opportunities and resources to further develop this part of the program.
Programmatic Coordination and Partnerships	PROGRAM SUGGESTION: NOAA recommends that GA continue to further develop the Compliance and Enforcement program, looking at staffing needs and how to obtain timely and responsive legal advice.
Education & Outreach	PROGRAM SUGGESTION: The GCMP should expand public knowledge of program, possibly targeting rural and small communities, city councils, and county commissioners.

## Appendix B. GCMP's Response to 2005 Evaluation Findings

### Response to 2005 NOAA Section 312 Evaluation Findings

**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 best to support local governments through the GCMP technical assistance function and the CIG Program, such as by finding means to increase the number of GCMP technical assistance staff; continuing to support and promote resources and programs such as “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.*

**RESPONSE:** The GCMP, since 2006, has worked to improve its service to coastal local governments. The Program was not able to increase the number of technical assistance staff (Coastal Resource Specialists) due to state personnel policies and state budget constraints. However, other actions were taken to make the efforts of existing staff more efficient. Results from these efforts have been described in previous sections. In addition, in 2006 the GCMP and partner SINERR engaged a contractor to conduct a Coastal Community Needs Assessment Survey to ask community decision-makers and their staff what coastal resource management issues were most pressing in their communities, and also to determine what form of technical assistance they would like to receive (one-on-one vs. workshop, etc.). The results of the survey did not yield one issue that stood out as a priority for all communities, but it did help direct the GCMP in refining its provision of technical assistance, including the development of “specialty areas” or areas of expertise within the Technical Assistance Program. These specialty areas also have enabled staff to timely information related to state, regional and national priorities directly to local governments.

The GCMP also continued the development of tools and resources for coastal local governments. Specifically, the Program funded the development of a guidebook for the GCMP/NOAA Coastal Services Center *Alternatives for Coastal Development* project that provides an expanded “how-to” guide for the evaluation of alternative development scenarios within a community. This guide was provided to NOAA CSC and other project partners for their use as well. GCMP has worked to make the Georgia Green Growth Guidelines a living document. Since 2006, the Program has developed a new economics chapter (completed in 2010) and two additional chapters are currently underway (recreational facilities and local government planning tools). A suite of model ordinance discussed above in the Community Development and Coastal Dependent Uses performance measure category will also be added to the Green Growth Guidelines. Finally, a complete update of the Green Growth Guidelines is underway to reflect changes in new guidance for stormwater management. This is scheduled for completion in 2011.

On February 11, 2005, Governor Sonny Perdue signed an Executive Order directing Georgia's Department of Community Affairs to complete a Coastal Comprehensive Master Development Plan by September 2007. The Plan was to outline a vision for Georgia's coastal area that promotes sustainable future development without compromising the region's valuable and

vulnerable natural environment. The plan was developed by stakeholders with expertise in the areas of tourism, economic development, environmental management, housing and transportation. The GCMP funded a portion of the plan development and was a key stakeholder throughout the planning process. The GCMP remains a key stakeholder as the Coastal Comprehensive Plan (now titled Regional Plan of Coastal Georgia) enters the implementation phase, led by the Coastal Regional Commission. Coastal Resource Specialists serve on an implementation team and are currently involved in developing a strategy to implement the natural resource-related provisions within coastal local governments.

**PROGRAM SUGGESTION:** *In response to increased development and impacts along Georgia's relatively undeveloped coast, permitted 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 re-authorization 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.*

**RESPONSE:** The GCMP developed an outreach strategy to ensure the reauthorization of the Georgia Coastal Management Act (GCMA) prior to its sunset in June 2009. A key component of the strategy was to highlight the GCMP as a service and assistance program, and not just a regulatory program. To that end, staff redesigned its Triennial Report to the State Legislature to appeal specifically to elected officials. This report was sent to the coastal delegation in advance of the 2008 legislative session where a bill to reauthorize the GCMA was to be introduced. In the summer of 2008, staff launched a campaign to promote the GCMP in advance of the reauthorization bill that included an increased presence at educational venues outside of the immediate coastal zone and throughout the state (Coweta County Fair, Sportsman's Day at the Capital, etc.). This campaign was also carried out at the annual CoastFest celebration where staff redesigned the Program's exhibit to focus more on the outreach and assistance-related aspects of the Program. As a result of these efforts, the GCMA was reauthorized during the 2008 legislative session such that the Program's sunset provision was repealed. The lasting effect of this strategy is that the Program has greatly improved the visibility of the non-regulatory program components among constituents.

**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.*

**RESPONSE:** The GCMP continued to work with the Coastal Advisory Council to clarify and improve its role in supporting Program implementation. A key objective of the CAC is to provide input to the Coastal Incentive Grant Program through annual theme setting activities and by establishing project evaluation criteria. The CAC and GCMP have worked to strengthen the CAC's role in this area. Several committees have been formed to address particular aspects of the grant program, including revisions to the project evaluation criteria and limitations to multi-year project proposals. The CAC has also been tremendously supportive of the GCMPs

recommendations for Directed Projects as a means to fund projects critical to the implementation of the program. This is all evidence of the closer role the GCMP has with the Council.

Various committees have been appointed by CAC Chairs over the past 5-years, including a Coastal Development Tracking and Planning Committee to compile information and analyze development proposals, trends, and impacts as well as ongoing local and regional planning activities, for use in advising the CAC to make recommendations for implementing, adapting, and improving the GCMP. A CAC Operations Committee is currently working to increase participation of members, increase efficiency of the CAC and increase effectiveness of council in its ability to provide advice to DNR as set forth in the by-laws. All committees were established by Council members with approval of the Chair. GCMP staff provides logistical support to Committees on an as-requested basis.

Finally, in 2009 the GCMP conducted a survey of CAC members as a way to learn more about members' interests in serving on the Council, how the staff can facilitate their participation and how to ensure an effective and efficient council. The results of the survey revealed that most members are interested in receiving information from GCMP staff about timely coastal resource management issues. In response to this finding, the GCMP has organized at least one speaker for each meeting to talk about a coastal issue or project. Recipients of Coastal Incentive Grants have been among the presenters.

Coordination with chair and vice chair is excellent. Last year a new handbook was developed to orient new members and remind existing members of the Council's role and purpose. The Coastal Advisory Council is supported by the DNR Commissioner as evidenced by its reauthorization in 2007 and again in 2011.

***PROGRAM SUGGESTION:*** *The 40/60 split should be re-evaluated and potentially modified in light of level or declining federal resources. The CZMA required 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.*

**RESPONSE:** The GCMP has prioritized the allocation of CZMA Section 306 funds to ensure that adequate program staff and operating funds are available to support full implementation of the Program. Formal modification of the 40/60 split has not been addressed as there have been some years where the Program could not generate a sufficient amount of state matching funds to retain anything greater than 40% for Program operations. As a practice, the Program makes every effort to pass through as much of the 60% as possible, but ensures that Program needs are met first. In the past two years, the split has been closer to 50/50.

As noted previously, the CAC has been tremendously supportive of the GCMP putting forward Directed Projects for funding under the CIG Program as a means to have critical research or other projects accomplished. To date, the CAC has approved 3 GCMP directed projects to fund



much needed work, including: development of a water quality indicators report (Cycle 10 and 11); coastal Georgia LIDAR project (Cycle12); and a study of marsh wrack (Cycle13 and 14).

## ***Appendix C. Persons and Institutions Contacted***

### **Department of Natural Resources: Coastal Resources Division**

Brad Gane, Assistant Director  
Jill Andrews, Program Manager  
Susan Reeves, Grants Coordinator  
Elizabeth Cheney, Beach Program Coordinator  
Sonny Emmert, Coastal Resource Specialist  
Dominic Guadagnoli, Water Quality Supervisor  
Paulette Hayes, Marine Technician  
William Hughes, Marine Technician  
Jennifer Kline, Coastal ARK Coordinator  
Jan Mackinnon, Wetlands Program Coordinator  
Kelly O'Rourke, Coastal Resources Specialist  
Karl Burgess, Program Manager  
Deb Barriero, Coastal Permit Coordinator  
Marci De Sart, Coastal Permit Coordinator  
Shea Gaither, Coastal Permit Coordinator  
Cindy Gregory, Associate Permit Coordinator  
Lisa Kowalczyk, Coastal Permit Coordinator  
Kelie Moore, Federal Consistency Coordinator  
Ann Thran, Coastal Permit Coordinator  
John Wynne, Coastal Permit Coordinator  
Buck Bennett, Program Manager  
Kevin Brady, Legal Assistant  
Josh Noble, Coastal Permit Coordinator  
Dominic Guadagnoli, Shellfish Monitoring

### **Department of Natural Resources: Environmental Protection Division:**

Bruce Foisy, Environmental Protection Division  
Alice Vick, Environmental Protection Division  
Cliff Lewis, Environmental Protection Division  
Jeff Larsen, Environmental Protection Division

Dale Caldwell, Environmental Protection Division  
Jeannie Lewis, Environmental Protection Division  
Brian Baker, Environmental Protection Division

### **Partners:**

Jan Mackinnon, EPA Wetlands grants  
Elizabeth Cheney, EPA Beach Program

Randall Walker, University of Georgia Marine Extension Service

Janice Flory, University of Georgia, Georgia Coastal Research Council  
Dr. Clark Alexander, Jr, Skidaway Institute  
Charles Hopkinson, GA Sea Grant  
Clark Alexander, Skidaway Institute  
Chandra Franklin, Savannah State University

Johanna Bounds, Chatham County-Savannah Metropolitan Planning Commission  
Jackie Teel, Chatham County-Savannah Metropolitan Planning Commission  
Bill Edwards, City of Hinesville

Brett Coole, City of Darien  
John Cox, City of Darien  
Kelly Spratt, McIntosh County Board of Commissioners  
Frank Field, City of Darien

Christi Lambert, The Nature Conservancy

Joe Slaughter, Georgia Power  
Eugene Keferl, College of Coastal Georgia  
Buddy Sullivan, Sapelo Island National Estuarine Research Reserve  
Suzanne VanParreson, Sapelo Island National Estuarine Research Reserve

Chris Emmer, Coastal Regional Commission  
David Dantzler, Coastal Regional Commission

Michael DeMell, Environmental Services, Inc.  
Bill Sapp, Southern Environmental Law Center  
Conn Cole, Camden County  
Sonny Timmerman, Liberty Consolidated Planning Commission

Sherelle Reinhardt, U.S. Army Corps of Engineers  
Mark Padgett, U.S. Army Corps of Engineers  
Margarett McIntosh, U.S. Army Corps of Engineers  
William Bailey, U.S. Army Corps of Engineers

*Appendix D. Persons Attending the Public Meetings*

The public meeting was held on May 25, 2011, at 5:30 at the Shipman Environmental Learning Center, One Conservation Way, Brunswick, GA.

The following members of the public attended this meeting.

David Kyler, Center for a Sustainable Coast  
Stan Humphries  
Bob Ingram  
Alice Vick, EPD

## **Appendix E. NOAA's Response to Written Comments**

OCRM received two sets of written comment regarding the Georgia Coastal Resources Management Program (GCMP). This letter is part of the official record of the evaluation and is briefly summarized below, followed by OCRM's response.

Bob Ingram  
St Simons Island, GA

**Comments:** Mr. Ingram expressed his concern about the lack of attention that is being given to climate change and the potential impacts on coastal Georgia. In particular, Mr. Ingram is concerned most information about climate change is not properly formatted for the general public. In addition, coal fired power plants in Georgia are a source of contribution to climate change and water consumption is also a concern for the State of Georgia.

**OCRM's Response:** The evaluation team thanks Mr. Ingram for his comments. The evaluation team heard about a number of recent activities such as the workshop "the Road to Resilience" which was held in partnership with local governments in the Savannah region which considered impacts such as increased coastal flooding and storm surge on the region. This was cited as an accomplishment over the review period and is a model that might serve other parts of coastal Georgia. OCRM appreciates the concern that information is not properly formatted for the general public.

David Kyler  
Center for a Sustainable Coast

**Comments:** Mr. Kyler expressed his concern about the effectiveness of networked state agency considerations in the state permit process. He further cites that until these considerations are applied, the Georgia Coastal Management Program will fall short of its potential to improve protection of coastal resources.

**OCRM's Response:** The evaluation team thanks Mr. Kyler for his comments. The evaluation team heard from a number of state agency partners that the permit review process goes well and there is adequate opportunity for networked state agencies to raise concerns about permit approvals. Also over the review period, the evaluation team identified a number of activities which have led to the increase in the protection of coastal resources. These include improvements to the Coastal Marshlands Protection Act and a new compliance and enforcement program.