



*Advocating responsible decisions to sustain coastal Georgia's environment and quality of life*

Mr. Landon and Members of the Camden County Planning and Development Commission:

The Center for a Sustainable Coast is strongly opposed to the variance request #ZV2016-8 by Lumar LLC regarding 87.51 acres of undeveloped land on Cumberland Island, presently zoned Conservation-Preservation.

For this subdivision to occur, it is our understanding that a waiver, or "variance," would have to be issued by the Planning Commission to meet the stated requirement for a paved frontage road.

Clearly, the only purpose of subdividing such property is to then proceed with a rezoning that, if granted, would allow construction of buildings on each of the subdivided lots – whether such rezoning occurred for all lots at once, or sequentially over a series of individual applications. Therefore, the variance request cannot be responsibly considered without contemplating its consequences. Reviewing the variance application in isolation of these consequences would be negligently misleading, with dire results.

The existing zoning, conservation-preservation, is in keeping with the dedicated purpose of Cumberland Island as a federally designated "National Seashore" – some 80% of which is a designated "Wilderness Area" under federal law. These dedications at Cumberland are rare and make the island extremely valuable as lasting remnants of a coastal barrier island in its nearly pristine natural state. The maritime forest, primary and secondary dunes, unpaved trails, and diverse wildlife of Cumberland, in its undeveloped state, create an unparalleled experience for millions of nature-loving visitors worldwide. Cumberland Island is not a recreational area, but rather a natural sanctuary enabling humans to witness the raw beauty and tranquility of an undisturbed barrier island.

The proposal under consideration presents the strong possibility of setting a dangerous precedent. If approved, this subdivision and subsequent rezoning and development would undoubtedly serve as incentives for further development and/or higher-impact redevelopment of other privately-held properties. If the requested subdivision is granted, a serious threat to the prized character of Cumberland Island will be unleashed, with consequences that are, cumulatively, likely to subvert the critically important public purpose of the National Seashore.

The Center for a Sustainable Coast, therefore, strongly objects to this proposal, with particular objection to any future rezonings that would permit construction on the referenced land. Without approval of the variance that would allow the subdivision, a future rezoning is extremely unlikely to be requested.

We firmly believe that the requested variance required for the subdivision would create an irreversible series of actions that would degrade natural conditions that are vital to retaining the highly valued character of Cumberland Island and therefore the variance requested should be denied.

Respectfully,

David C. Kyler, Executive Director