

John H. Chafee Coastal Barrier Resources System Unit FL-63P, Tigertail, Florida

Type of Unit: Otherwise Protected Area (OPA)

Location of Unit: South of Naples, in Collier County, Florida

Congressional District: 19

Draft Map Date: November 10, 2014

Imagery Source and Date: U.S. Department of Agriculture National Agriculture Imagery Program, 2013

Establishment of Unit: The Coastal Barrier Improvement Act of 1990 (P. L. 101-591 enacted on 11/16/1990) originally established Unit FL-63P.

Historical Changes to Unit: There have been no changes to the boundaries of Unit FL-63P since its designation in 1990.

Background and Proposed Changes to Unit: The comprehensively revised draft map dated November 10, 2014, modifies the boundary of Unit FL-63P to remove from the Coastal Barrier Resources System (CBRS) several structures in the South Seas Club community and more precisely

follow the boundary of Tigertail Beach Park, which is owned by Collier County. Portions of Sand Dollar Island that are owned by the State and are currently within Unit FL-63P are proposed for reclassification to Unit P16.

The Service's review of Collier County records indicates that 9 condominium buildings within the South Seas Northwest, South Seas West, and South Seas East areas of the South Seas Club community were constructed between 1979 and 1981. The Service's assessment (based on the level of development on the ground in 1990 and the development criteria codified by the Coastal Barrier Resources Reauthorization Act of 2000 in Section 2 of P.L. 106-514), indicates that these structures were inappropriately included within the CBRS and would be appropriate for removal from Unit FL-63P. There are no known private inholdings within the proposed boundaries of Unit FL-63P.

The CBRS contains two types of units, "System Units" and "Otherwise Protected Areas"

(OPAs). System Units are generally comprised of privately held areas. OPAs are generally comprised of areas held for wildlife refuge, sanctuary, recreational, or natural resource conservation purposes. When the Service comprehensively remaps a unit of the CBRS, the conserved areas within the unit are identified and the history of those areas is evaluated to determine whether they are appropriately classified as System Unit or OPA. The Service's CBRS remapping protocols generally recommend reclassification from System Unit to an OPA, or vice-versa, depending on when the particular area was included within the CBRS and whether the area was held for conservation or recreation at the time it was included. Unit FL-63P currently includes part of an area owned by the State of Florida that is known as Sand Dollar Island. The Service's review found no documentation indicating that this area is held for conservation or recreation (in accordance with the Coastal Barrier Resources Act definition of an OPA), however it does meet the criteria for a System Unit. Therefore, this area is proposed for reclassification to System Unit P16.

Acres, Shoreline, and Structures:

	<i>Total Acres</i>	<i>Upland Acres</i>	<i>Associated Aquatic Habitat Acres*</i>	<i>Shoreline (miles)</i>	<i>Structures**</i>
Existing Unit	214	38	176	0.9	
Added to the CBRS	0	0	0		0
Removed from the CBRS	(52)	(30)	(22)		(9)
Reclassified Area	(119)	(1)	(118)	0.0	
Proposed Unit	43	7	36	0.0	
Net Change	(171)	(31)	(140)	(0.9)	(9)

*Includes wetlands, marshes, estuaries, inlets, and open water landward of the coastal barrier, but does not include open water seaward of the shoreline.

**Approximate structure count derived from 2013 aerial imagery. Structures without walls and a roof (such as picnic shelters) and structures with fewer than 200 square feet were not counted.



John H. Chafee Coastal Barrier Resources System Unit P15P, Cape Romano, Florida

Type of Unit: Proposed new Otherwise Protected Area (OPA)

Location of Unit: South of Naples, in Collier County, Florida

Congressional District: 19

Draft Map Date: November 10, 2014

Imagery Source and Date: U.S. Department of Agriculture National Agriculture Imagery Program, 2013

Current CBRS Status: The proposed new OPA Unit P15P is not currently within the Coastal Barrier Resources System (CBRS).

Otherwise Protected Area Criteria: Proposed new Unit P15P meets the Coastal Barrier Resources Act definition of an OPA and criteria for an undeveloped coastal barrier. The majority of the area proposed for inclusion within this new unit is maintained for conservation and recreation purposes by the State of Florida (State) as part of the Rookery Bay National Estuarine Research Reserve (RBNERR) or is privately held and subject to a conservation easement.

Background and Proposed Unit: The comprehensively revised draft map dated November 10, 2014, proposes to include within Unit P15P areas owned by the State that are part of the RBNERR, minor portions of the Rookery Bay Aquatic Preserve owned by the State, and areas owned by the Key Marco Community Association (comprising about 26 acres) that are subject to a conservation easement held by the Conservancy of Southwest Florida. There are no known private inholdings within the proposed boundaries of Unit P15P.

The adjacent Unit P15 currently includes portions of the Cape Romano–Ten Thousand Islands Aquatic Preserve and Rookery Bay Aquatic

Preserve that are proposed to remain within Unit P15. Other portions of these two Aquatic Preserves (consisting primarily of shoals and open water) are proposed for addition to Unit P15. The Department of the Interior (DOI), in Volume 14 of the 1988 Report to Congress: Coastal Barrier Resources System, Recommendations for Additions to or Deletions from the Coastal Barrier Resources System, commented on areas designated as “Florida State Aquatic Preserves” and “Outstanding Florida Waters.” The report stated that DOI had carefully considered the legal status of Florida State Aquatic Preserves and found that they do not meet the definition of “otherwise protected”. This 1988 recommendation was supported by comments submitted by the State to DOI about the level of protection afforded to these areas. The DOI report states that “although these waters and their surrounding shorelines are subject to stricter permitting requirements, they can be developed. They are not set aside for wildlife refuge, recreational, or other natural resources conservation purposes. Therefore, where Aquatic Preserves or Outstanding Florida Waters meet other definition and delineation criteria, the DOI recommends they be included in the CBRS.” The U.S. Fish and Wildlife Service continues to support this recommendation that Florida State Aquatic Preserves and Outstanding Florida Waters be classified within the CBRS as System Units rather than as OPAs.

The adjacent Unit P15 currently includes portions of the RBNERR that are proposed to remain within the unit. Other portions of the RBNERR are proposed for inclusion within the new Unit P15P. However, minor portions of the RBNERR are proposed for inclusion within Unit P15 in cases where it is impractical from a mapping perspective to delineate them separately from the surrounding System Unit (i.e., small islands or

other features that are too small to carve out from the surrounding aquatic habitat). Similarly, minor portions of the Rookery Bay Aquatic Preserve are proposed for inclusion within Unit P15P where it is impractical to delineate them separately from the surrounding OPA.

Cape Romano Unit P15P, Florida

Acreage, Shoreline, and Structures:

	<i>Total Acres</i>	<i>Upland Acres</i>	<i>Associated Aquatic Habitat Acres*</i>	<i>Shoreline (miles)</i>	<i>Structures**</i>
Existing Unit	0	0	0	0.0	
Added to the CBRS	1,502	6	1,496		0
Removed from the CBRS	0	0	0		0
Reclassified Area	0	0	0	0.0	
Proposed Unit	1,502	6	1,496	0.0	
Net Change	1,502	6	1,496	0.0	0

*Includes wetlands, marshes, estuaries, inlets, and open water landward of the coastal barrier, but does not include open water seaward of the shoreline.

** Approximate structure count derived from 2013 aerial imagery. Structures without walls and a roof (such as picnic shelters) and structures with fewer than 200 square feet were not counted.

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John H. Chafee Coastal Barrier Resources System Unit P15, Cape Romano, Florida

Type of Unit: System Unit

Location of Unit: South of Naples, in Collier County, Florida

Congressional District: 19

Draft Map Date: November 10, 2014

Imagery Source and Date: U.S. Department of Agriculture National Agriculture Imagery Program, 2013

Establishment of Unit: The Coastal Barrier Resources Act of 1982 (CBRA; P. L. 97-348 enacted on 10/18/1982) originally established Unit P15.

Historical Changes to Unit: The Coastal Barrier Improvement Act of 1990 (P.L. 101-591 enacted on 11/16/1990) modified the eastern boundary of Unit P15 to add Helen Key, Henry Key, Fred Key, Margaret Key, and portions of the southern end of Horrs Island, along with their associated aquatic habitat, to the unit.

Background and Proposed Changes to Unit: The comprehensively revised draft map dated November 10, 2014, does not propose to remove any areas from Unit P15. The proposed boundary of Unit P15 is modified to add to the Coastal Barrier Resources System (CBRS) areas that meet the CBRA criteria for an undeveloped coastal barrier, including areas owned by the U.S. Fish and Wildlife (Service) that are part of the Ten Thousand Islands National Wildlife Refuge (NWR); areas owned by the State of Florida (State) that are part of the Cape Romano – Ten Thousand Islands Aquatic Preserve, Rookery Bay Aquatic Preserve, and Rookery Bay National Estuarine Research Reserve (RBNERR); and some privately owned areas (including approximately 46 acres on the southeastern side of Horrs Island and 3 acres along Barfield Bay). The draft map does not include within Unit P15 portions of Horrs Island (also known as Key

Marco) where the existing level of development exceeds the development threshold codified by the Coastal Barrier Resources Reauthorization Act of 2000 (Section 2 of P.L. 106-514).

The CBRS contains two types of units, “System Units” and “Otherwise Protected Areas” (OPAs). System Units are generally comprised of privately held areas. OPAs are generally comprised of areas held for wildlife refuge, sanctuary, recreational, or natural resource conservation purposes. When the Service comprehensively remaps a unit of the CBRS, the conserved areas within the unit are identified and the history of those areas is evaluated to determine whether they are appropriately classified as System Unit or OPA. The Service’s CBRS remapping protocols generally recommend reclassification from System Unit to an OPA, or vice-versa, depending on when the particular area was included within the CBRS and whether the area was held for conservation or recreation at the time it was included. An exception is made for certain conservation and recreation areas where the landowner specifically requested their lands be included within the CBRS as a System Unit. Unit P15 currently includes many areas that are owned by the State and held for conservation or recreation purposes. The Service sought input from the State during the preparation of the draft map. The State’s Department of Environmental Protection did not recommend any changes to the existing CBRS designations, though the State may have further comment following a public review of the draft map and a review of the draft map by the Board of Trustees of the Internal Improvement Trust Fund.

Unit P15 currently includes portions of the Cape Romano – Ten Thousand Islands Aquatic Preserve and Rookery Bay Aquatic Preserve that are proposed to remain within the unit. Other portions of these two Aquatic Preserves

(consisting primarily of shoals and open water) are proposed for addition to Unit P15. The Department of the Interior (DOI), in Volume 14 of the 1988 Report to Congress: Coastal Barrier Resources System, Recommendations for Additions to or Deletions from the Coastal Barrier Resources System, commented on areas designated as “Florida State Aquatic Preserves” and “Outstanding Florida Waters.” The report stated that DOI had carefully considered the legal status of Florida State Aquatic Preserves and found that they do not meet the definition of “otherwise protected.” This 1988 recommendation was supported by comments submitted by the State to DOI about the level of protection afforded to these areas. The DOI report states that “although these waters and their surrounding shorelines are subject to stricter permitting requirements, they can be developed. They are not set aside for wildlife refuge, recreational, or other natural resources conservation purposes. Therefore, where Aquatic Preserves or Outstanding Florida Waters meet other definition and delineation criteria, the DOI recommends they be included in the CBRS.” The Service continues to support this recommendation that Florida State Aquatic Preserves and Outstanding Florida Waters be classified within the CBRS as System Units rather than as OPAs.

Unit P15 currently includes portions of the RBNERR that are proposed to remain within the unit. Other portions of the RBNERR are proposed for inclusion within the new Unit P15P. However, minor portions of the RBNERR are proposed for inclusion within Unit P15 in cases where it is impractical from a mapping perspective to delineate them separately from the surrounding System Unit (i.e., small islands or other features that are too small to carve out from the surrounding aquatic habitat). Similarly, minor portions of the Rookery Bay Aquatic Preserve are proposed for inclusion within Unit P15P where it is impractical to delineate them separately from the surrounding OPA.

Cape Romano Unit P15, Florida

Portions of the Ten Thousand Islands NWR are proposed for addition to Unit P15. Although these areas meet the CBRA definition of an OPA, the NWR concurred with these areas being added to the CBRS as System Unit instead of as OPA.

Acreage, Shoreline, and Structures:

	<i>Total Acres</i>	<i>Upland Acres</i>	<i>Associated Aquatic Habitat Acres*</i>	<i>Shoreline (miles)</i>	<i>Structures**</i>
Existing Unit	7,259	3	7,256	5.2	
Added to the CBRS	11,720	0	11,720		0
Removed from the CBRS	0	0	0		0
Reclassified Area	0	0	0	0.0	
Proposed Unit	18,979	3	18,976	7.6	
Net Change	11,720	0	11,720	2.4	0

*Includes wetlands, marshes, estuaries, inlets, and open water landward of the coastal barrier, but does not include open water seaward of the shoreline.

** Approximate structure count derived from 2013 aerial imagery. Structures without walls and a roof (such as picnic shelters) and structures with fewer than 200 square feet were not counted.

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John H. Chafee Coastal Barrier Resources System Unit P16P, Keewaydin Island, Florida

Type of Unit: Proposed new Otherwise Protected Area (OPA)

Location of Unit: South of Naples, in Collier County, Florida

Congressional District: 19

Draft Map Date: November 10, 2014

Imagery Source and Date: U.S. Department of Agriculture National Agriculture Imagery Program, 2013

Current CBRS Status: The proposed new OPA Unit P16P is not currently within the Coastal Barrier Resources System (CBRS).

Otherwise Protected Area Criteria: Proposed new Unit P16P meets the Coastal Barrier Resources Act definition of an OPA and criteria for an undeveloped coastal barrier. The area proposed for inclusion within this new unit is maintained for conservation purposes by the City of Naples and is subject to a conservation easement. Additional areas proposed for inclusion within the new Unit P16P include areas owned by the State of Florida (State) as part of the Rookery Bay National Estuarine Research Reserve (RBNERR) and areas owned by Collier County for conservation purposes.

Background and Proposed Unit: The comprehensively revised draft maps dated November 10, 2014, propose to include within Unit P16P areas owned by the State that are part of the RBNERR; minor portions of the Rookery Bay Aquatic Preserve owned by the State; areas owned by the City of Naples that are subject to a conservation easement held by the State of Florida Trustees of the Internal Improvement Trust Fund; the Shell Island Preserve and other conservation areas in Tarpon Bay which are owned by Collier County; and a 15 acre private inholding that is completely surrounded by the

RBNERR.

The adjacent Unit P16 currently contains areas that are designated as “Florida State Aquatic Preserves” and “Outstanding Florida Waters.” Other portions of this Aquatic Preserve (consisting primarily of shoals and open water) are proposed for addition to Unit P16. The Department of the Interior (DOI), in Volume 14 of the 1988 Report to Congress: Coastal Barrier Resources System, Recommendations for Additions to or Deletions from the Coastal Barrier Resources System, commented on areas designated as “Florida State Aquatic Preserves” and “Outstanding Florida Waters.” The report stated that DOI had carefully considered the legal status of Florida State Aquatic Preserves and found that they do not meet the definition of “otherwise protected.” This 1988 recommendation was supported by comments submitted by the State to DOI about the level of protection afforded to these areas. The DOI report states that “although these waters and their surrounding shorelines are subject to stricter permitting requirements, they can be developed. They are not set aside for wildlife refuge, recreational, or other natural resources conservation purposes. Therefore, where Aquatic Preserves or Outstanding Florida Waters meet other definition and delineation criteria, the DOI recommends they be included in the CBRS.” The U.S. Fish and Wildlife Service continues to support this recommendation that Florida State Aquatic Preserves and Outstanding Florida Waters be classified within the CBRS as System Units rather than as OPAs.

The adjacent Unit P16 currently includes portions of the RBNERR that are proposed to remain within the unit. Other portions of the RBNERR are proposed for inclusion within the new Unit P16P. However, minor portions of the RBNERR are proposed for inclusion within Unit

P16 in cases where it is impractical from a mapping perspective to delineate them separately from the surrounding System Unit (i.e., small islands or other features that are too small to carve out from the surrounding aquatic habitat). Similarly, minor portions of the Rookery Bay Aquatic Preserve are proposed for inclusion within Unit P16P where it is impractical to delineate them separately from the surrounding OPA.

Keewaydin Island Unit P16P, Florida

Acreage, Shoreline, and Structures:

	<i>Total Acres</i>	<i>Upland Acres</i>	<i>Associated Aquatic Habitat Acres*</i>	<i>Shoreline (miles)</i>	<i>Structures**</i>
Existing Unit	0	0	0	0.0	
Added to the CBRS	2,022	329	1,693		0
Removed from the CBRS	0	0	0		0
Reclassified Area	0	0	0	0.0	
Proposed Unit	2,022	329	1,693	0.0	
Net Change	2,022	329	1,693	0.0	0

*Includes wetlands, marshes, estuaries, inlets, and open water landward of the coastal barrier, but does not include open water seaward of the shoreline.

** Approximate structure count derived from 2013 aerial imagery. Structures without walls and a roof (such as picnic shelters) and structures with fewer than 200 square feet were not counted.

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John H. Chafee Coastal Barrier Resources System Unit P16, Keewaydin Island, Florida

Type of Unit: System Unit

Location of Unit: South of Naples, in Collier County, Florida

Congressional District: 19

Draft Map Date: November 10, 2014

Imagery Source and Date: U.S. Department of Agriculture National Agriculture Imagery Program, 2013

Establishment of Unit: The Coastal Barrier Resources Act of 1982 (CBRA; P. L. 97-348 enacted on 10/18/1982) originally established Unit P16.

Historical Changes to Unit: The Coastal Barrier Improvement Act of 1990 (P.L. 101-591 enacted on 11/16/1990) modified the eastern boundary of Unit P16 to add associated aquatic habitat to the unit and modified the southern boundary to add portions of uplands known as Isles of Capri and Royal Marco Point located on either side of Big Marco Pass, along with their associated aquatic habitat, to the unit.

The U.S. Fish and Wildlife Service (Service; via notice published in the Federal Register on 2/24/1997; 62 FR 8258) modified the southern boundary of the unit at the mouth of Big Marco Pass to include a substantial shoal which had developed outside of the unit. This area is known today as Sand Dollar Island. This modification was made in accordance with Section 3 of P.L. 101-591, which allows for modifications to the Coastal Barrier Resources System (CBRS) boundaries to reflect changes that have occurred as a result of natural forces.

Background and Proposed Changes to Unit: The comprehensively revised draft maps dated November 10, 2014, modify the boundary of Unit P16 to remove from the CBRS the Royal Marco Point, La Peninsula, and Twin Dolphins condominium complexes, and a few private homes on the Isles

of Capri (comprising about 46 acres). The proposed boundary of the unit is also modified to add to the CBRS areas that meet the CBRA criteria for an undeveloped coastal barrier, including areas owned by the National Audubon Society; areas owned by the State of Florida (State) that are part of the Rookery Bay Aquatic Preserve and Rookery Bay National Estuarine Research Reserve (RBNERR); submerged areas in Tarpon Bay owned by Collier County; and approximately 477 acres of privately owned areas (including a mangrove island, portions of the "Isles of Collier Preserve" Planned Unit Development, and areas owned by the Hideaway Beach Association). Portions of Sand Dollar Island that are owned by the State and are currently within Unit FL-63P are proposed for reclassification to Unit P16. The Service's review found no documentation indicating that this area is held for conservation or recreation (in accordance with the Coastal Barrier Resources Act (CBRA) definition of an "Otherwise Protected Area" (OPA)), however it does meet the criteria for a System Unit. There is also a portion of Sand Dollar Island which is currently located outside of the CBRS between Unit FL-63P and Unit P16 that is proposed for addition to Unit P16.

The Service reviewed the Royal Marco Point Condominium Complex using information provided by the condominium association as well as Collier County records, which indicate that the six condominium buildings were constructed between 1990 and 1996 and all had a full complement of infrastructure available to each building site prior to their designation. The Service's review found that the buildings that were not walled and roofed until after their designation within the CBRS on November 16, 1990 had a full complement of infrastructure. The Service also reviewed the Twin Dolphins and La Peninsula condominiums on Isles of Capri using information provided by

an interested party as well as Collier County records, which indicate that the La Peninsula condominiums were constructed between 1985 and 1988 and the Twin Dolphins condominium was completed in 2002. There are an additional five structures that were built within the vicinity of these condominiums between 1982 and 2006. The majority of the buildings were constructed prior to their designation within the CBRS on November 16, 1990. The Service's assessment (based on the level of development on the ground in 1990 and the development criteria codified by the Coastal Barrier Resources Reauthorization Act of 2000 in Section 2 of P.L. 106-514), indicates the structures within the Royal Marco Point Condominium Complex and the structures on the Isles of Capri were inappropriately included within the CBRS and would be appropriate for removal from Unit P16.

The CBRS contains two types of units, "System Units" and OPAs. System Units are generally comprised of privately held areas. OPAs are generally comprised of areas held for wildlife refuge, sanctuary, recreational, or natural resource conservation purposes. When the Service comprehensively remaps a unit of the CBRS, the conserved areas within the unit are identified and the history of those areas is evaluated to determine whether they are appropriately classified as System Unit or OPA. The Service's CBRS remapping protocols generally recommend reclassification from System Unit to an OPA, or vice-versa, depending on when the particular area was included within the CBRS and whether the area was held for conservation or recreation at the time it was included. An exception is made for certain conservation and recreation areas where the landowner specifically requested their lands be included within the CBRS as a System Unit. Unit P16 currently includes many areas that are owned by the State and held for conservation or recreation purposes. The Service sought input from the

State during the preparation of the draft maps. The State's Department of Environmental Protection did not recommend any changes to the existing CBRS designations, though the State may have further comment following a public review of the draft maps and a review of the draft maps by the Board of Trustees of the Internal Improvement Trust Fund. The Service also sought input from the National Audubon Society, the Conservancy of Southwest Florida, and The Nature Conservancy, all of which own areas that meet the CBRA definition of an OPA. Each of these landowners, however, concurred with maintaining their areas within the CBRS as a System Unit rather than reclassifying them to an OPA.

Unit P16 currently includes portions of the Rookery Bay Aquatic Preserve that are proposed to remain within the unit. Other portions of this Aquatic Preserve (consisting primarily of shoals and open water) are proposed for addition to Unit P16. The Department of the Interior (DOI), in Volume 14 of the 1988 Report to Congress: Coastal Barrier Resources

System, Recommendations for Additions to or Deletions from the Coastal Barrier Resources System, commented on areas designated as "Florida State Aquatic Preserves" and "Outstanding Florida Waters." The report stated that DOI had carefully considered the legal status of Florida State Aquatic Preserves and found that they do not meet the definition of "otherwise protected." This 1988 recommendation was supported by comments submitted by the State to DOI about the level of protection afforded to these areas. The DOI report states that "although these waters and their surrounding shorelines are subject to stricter permitting requirements, they can be developed. They are not set aside for wildlife refuge, recreational, or other natural resources conservation purposes. Therefore, where Aquatic Preserves or Outstanding Florida Waters meet other definition and delineation criteria, the DOI recommends they be included in the CBRS." The Service continues to support this recommendation that Florida State Aquatic Preserves and Outstanding Florida Waters be

classified within the CBRS as System Units rather than as OPAs.

Unit P16 currently includes portions of the RBNERR that are proposed to remain within the unit. Other portions of the RBNERR are proposed for inclusion within the new Unit P16P. However, minor portions of the RBNERR are proposed for inclusion within Unit P16 in cases where it is impractical from a mapping perspective to delineate them separately from the surrounding System Unit (i.e., small islands or other features that are too small to carve out from the surrounding aquatic habitat). Similarly, minor portions of the Rookery Bay Aquatic Preserve are proposed for inclusion within Unit P16P where it is impractical to delineate them separately from the surrounding OPA.

Areas owned by the National Audubon Society (and leased to the State as part of the RBNERR) are proposed for addition to Unit P16. Although these areas meet the CBRA definition of an OPA, the National Audubon Society concurred with these areas being added to the CBRS as System Unit instead of OPA.

Acreage, Shoreline, and Structures:

	<i>Total Acres</i>	<i>Upland Acres</i>	<i>Associated Aquatic Habitat Acres*</i>	<i>Shoreline (miles)</i>	<i>Structures**</i>
Existing Unit	16,281	1,119	15,162	9.7	
Added to the CBRS	1,899	107	1,792		0
Removed from the CBRS	(47)	(43)	(4)		(20)
Reclassified Area	119	1	118	0.0	
Proposed Unit	18,252	1,184	17,068	11.2	
Net Change	1,971	65	1,906	1.5	(20)

*Includes wetlands, marshes, estuaries, inlets, and open water landward of the coastal barrier, but does not include open water seaward of the shoreline.

** Approximate structure count derived from 2013 aerial imagery. Structures without walls and a roof (such as picnic shelters) and structures with fewer than 200 square feet were not counted.

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