



P.O. Box 872 Scottdale, GA 30079  
[www.wildcumberland.org29](http://www.wildcumberland.org29)

December 29, 2022

Superintendent Gary Ingram  
Cumberland Island National Seashore  
101 Wheeler Street  
St. Marys, Georgia 31558

Re: Cumberland Island National Seashore Proposed Visitor Use Management Plan & Environmental Assessment (2022)

Dear Superintendent Ingram,

Thank you for this opportunity to comment on the proposed Visitor Use Management Plan and Environmental Assessment. The public comment and environmental review process was established to protect public interest and ensure that the general public has an opportunity to share site-specific knowledge and weigh in on any proposed changes. We appreciate the extension of thirty (30) days provided to review the proposed plan.

Wild Cumberland believes that opportunities for civic engagement and cooperative conservation should be factored into any decision-making process regarding our public lands. We also acknowledge that managing visitor access and use for recreational benefits and resource protection is inherently complex — particularly within Cumberland Island National Seashore and Wilderness.

A Visitor Use Management Plan (VUMP) should ideally establish a vision for the future, provide a clear connection to future management actions, and protect against incremental or haphazard change. For implementation within a Seashore that has had approximately 20 superintendents in its 50-year history, protecting against haphazard changes is particularly relevant and necessary.

Unfortunately, we find the proposed plan and its environmental assessment to be filled with contradictions and insufficient for proper public evaluation. It is impossible for the public to fully evaluate the implications of the proposed plan until the questions and issues raised in this document have been adequately addressed:

**1. Purpose and Intent of the Seashore**

In determining whether or how to allow certain types of uses, park managers must first consider the congressional or presidential interest as expressed in the enabling legislation or proclamation.

Cumberland Island National Seashore was established by the Act of October 23, 1972, 86 stat. 1066, Public Law 92-536, *"to provide for public outdoor recreation use and enjoyment of certain significant*

shoreline lands and waters of the United States, and to preserve related scenic, scientific and historical values".

The law further states that "the Seashore shall be permanently preserved in its primitive state, and no development of the project or plan for the convenience of visitors shall be undertaken which would be incompatible with the preservation of the unique flora and fauna or the physiographic conditions now prevailing".

Cumberland Island National Seashore (CUIIS) is one of two seashores that includes this very specific language, and it was granted an *additional layer of protection with Wilderness and Potential Wilderness designation in 1982*. We disagree with the NPS' assessment that the proposed Visitor Use Management Plan aligns with the purpose and intent of the Seashore.

## **2. Congressionally-Protected Wilderness**

Though the Cumberland Island Wilderness Boundary Adjustment Act of 2004 (Division E, Section 145 of Public Law 108-447) removed three roads from within the Cumberland Island Wilderness (Main Road, North Cut Road, and Plum Orchard Spur), required management to offer public access to historic resources adjacent to the Wilderness, and adjusted its external boundary -- **Cumberland Island Wilderness remains today**. Many of the items contained in the proposed Visitor Use Management Plan are in direct violation of the law and others lack appropriate evaluation.

## **3. Additional Directives**

Perhaps the most important statutory directive for the National Park Service is provided by interrelated provisions of the NPS Organic Act of 1916 and the NPS General Authorities Act of 1970 (*including amendments to the latter law enacted in 1978*). The management-related provision of the Organic Act reads as follows:

*[The National Park Service] shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified...by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. (16 USC 1)*

Congress, recognizing that the enjoyment by future generations of the national parks can be ensured only if the quality of park resources and values is left unimpaired, has provided that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant.

- The approved CUIIS 1994 Land Protection Plan identified top priorities for the Seashore as *Potential Wilderness, protection of Wilderness, St Marys administrative sites, and other federal lands contiguous with the island*. With this information, and particularly in light of the unprecedented challenges our coastlines and barrier islands are currently facing, it is disappointing that local park management would choose to prioritize current visitor access changes over resource protection for future generations.
- Director's Order 75 (Civic Engagement and Public Involvement) also directs managers to extend interactions with stakeholders beyond the formal public participation process of NEPA and other laws.

- Stakeholders (specifically, referenced on pages 1, 2, and 81 of the 2022 Visitor Use Management Plan) are not identified, and any requests for updates related to revisions of this plan made by our organization since 2019 were rebuffed.
- The NPS has a responsibility to ensure that management incorporates the desires of the public, within bounds set by law and policy (which also reflect public values) and the physical constraints of natural systems.

#### 4. National Park Service Management Policies

Even as the Seashore celebrates its 50th anniversary, a Wilderness management plan (or Wilderness stewardship plan) has never been approved for Cumberland Island. The Seashore's Foundation Document (2014) lists priorities, planning, and data needs for its future and clearly identifies natural resource planning as an equally-high priority.

Public interest would have been far better served by development of a Wilderness Management Plan (WMP). The creation of a WMP would also meet the requirements of NPS Management Policies (2006), Chapter 6, Wilderness Preservation and Management, which directs each park superintendent in charge of wilderness resources to develop and maintain a wilderness stewardship plan to guide the preservation, management, and use of those resources.

In addition to directing each park to develop and maintain a Wilderness Stewardship Plan, NPS Management Policies (2006) further state: ***"To preserve Congress's prerogative to designate wilderness, general management plans and other plans potentially affecting eligible wilderness resources will propose no actions that could adversely affect the wilderness characteristics and values that make them eligible for consideration for inclusion in the National Wilderness Preservation System."*** 2.3.1.10. Wilderness

The following policies address the appropriate use of parks, including visitor use, consistent with the overall purpose of NPS policies to avoid or eliminate those impacts that, individually or cumulatively, would be inconsistent with a park's purposes or values; diminish opportunities for current or future generations to enjoy, learn about, or be inspired by park resources or values; or unreasonably interfere with an appropriate use or the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park;

The policies emphasize the NPS is to judge a particular form of visitor enjoyment to be *"appropriate"* recreation consistent with the protection of the park. (NPS 2006, sec. 8.1.1).

*Consequently, in determining whether a particular use is appropriate, the NPS shall evaluate all proposals for park uses, including proposals for visitor uses, for: consistency with applicable laws, executive orders, regulations, and policies; consistency with existing plans for public use and resource management; actual and potential effects on park resources and values; total costs to the Service; and whether the public interest will be served.* (NPS 2006, sec. 8.1.2)

In judging visitor uses, *"many forms of recreation enjoyed by the public do not require a national park setting and are more appropriate to other venues. The Service will therefore...provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks..."* (NPS 2006, sec. 8.2.2).

*“The Service will strive to preserve or restore the natural quiet and natural sounds associated with the physical and biological resources of parks. To do this, superintendents will carefully evaluate and manage how, when, and where motorized equipment is used by all who operate equipment in the parks, including park staff.” (NPS 2006, sec. 8.2.3).*

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise.

This ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them:

*The NPS has discretion to allow impacts on Park resources and values when necessary and appropriate to fulfill the purposes of a Park. However, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006, sec 1.4.3).*

*An action constitutes an impairment when its impacts “harm the integrity of Park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (NPS 2006, sec 1.4.5).*

*In determining whether an action constitutes impairment, the NPS must evaluate “the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts.”*

*Importantly, an impact is “more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:*

*\* necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, or*

*\* key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or*

*\* identified in the park’s general management plan or other relevant NPS planning documents as being of significance. (NPS 2006, sec. 1.4.5).*

Wild Cumberland finds the 2022 proposed Visitor Use Management Plan and Environmental Assessment out of compliance with federal law and NPS’ own management objectives/standards and completely deficient in the necessary data, mitigation measures, and cumulative impact evaluations required to be properly considered by the public at this time.

## **Concerns by Topic**

### **1. General Concerns (Wilderness)**

First and foremost, no published or public data or metrics exist by which to evaluate potential degradation or infringement upon Wilderness values at Cumberland Island National Seashore. We would also highlight the following:

- The proposed plan did not employ adequate Wilderness coordination in planning.

- The proposed plan is NEPA-deficient and provides insufficient environmental analysis for consideration.
- The plan, nor the public, can fully evaluate the impacts on wilderness because baseline data is unavailable; there are additional concerns relating to commercial operations in proximity to Wilderness, including cumulative impacts to the undeveloped quality of wilderness and opportunities for solitude or primitive and unconfined recreation.
- A Wilderness Management Plan is necessary before making any changes in visitor use. Without "desired future conditions" and a carrying capacity for wilderness areas, established by a WMP, the NPS cannot determine acceptability of predicted impacts.
- The plan suggests that Wilderness can be harmed for visitor experience (VUMP P10): "Balancing Wilderness Character and Visitor Experience." This contradicts the Wilderness Act and the 11th Circuit Court's previous ruling that the Wilderness Act is not intended to balance, it is meant to **protect**.
- The strategies for monitoring recreational impacts are weak, and baselines underdeveloped; mitigations for Wilderness impacts (Appendix A) are weak and attempt to change visitor behavior primarily through persuasion and information, which is a poor last-line management strategy.
- There is no documentation of any Minimum Resource Decision Guidance (MRDG) applied for any of the proposed actions as related to Wilderness or Potential Wilderness.
- The 1984 General Management Plan specifies visitor entrance to Wilderness at Stafford; the proposed plan changes Wilderness access via Plum Orchard. The impacts of this decision have not been fully analyzed.
  - This plan redistributes day-use visitors by boat or shuttle to a site that is directly adjacent to the *middle* of a federally-protected Wilderness without the necessary environmental analysis.
  - Access to Plum Orchard by boat was envisioned and justified by Congress when visitors could not use the Main Road to access the property; that is no longer the case.
- There are numerous types of commercial use authorizations included in this plan, and there is insufficient data, implementation, and mitigation measures to properly evaluate potential impacts.
- The plan increases recreational boat use, including on-island tours and rentals and motorized and non-motorized tours, but no locations or proximity to Wilderness are identified for proper evaluation.
- The proposed Visitor Use Management Plan indicators and thresholds described in "Appendix A: Indicators and Thresholds" are **completely insufficient for evaluation**.
- Appendix F, conflates the public purposes (plural) or uses in section 4(b) of the Wilderness Act with the overriding purpose (singular) in section 2(a) by stating, "the purpose of the wilderness is to protect the recreational, scenic, scientific, and historical values present within the wilderness boundary." (VUMP P 155). Section 2(a) of the Wilderness Act is clear; its "purpose" is "to secure for the American people of present and future generations the benefits of an enduring resource of wilderness".
  - *In 1962, Howard Zahniser, the author of the Wilderness Act, wrote, "The purpose of the Wilderness Act is to preserve the wilderness character of the areas to be included in the wilderness system, not to establish any particular use."*
- No discussion is given to nationwide use changes that have occurred since the start of the pandemic.
- The proposed plan does not adequately or proactively address increased user conflicts specific to Cumberland Island's truly unique, linear, and divided Wilderness that must facilitate multiple user groups (and would incorporate additional user groups in this plan). While rerouting trails and

moving campsites certainly disperses groups differently, that is mitigated by an increase in users, new and unlimited access points; and new categories of users.

- Many important elements of the Seashore's 1984 General Management Plan seem to have been selectively disregarded in the development of the proposed Visitor Use Management Plan, including:

*ISLAND DEVELOPMENT: "Historical and cultural resources are within walking distance for most visitors. From Stafford north, the island widens and becomes less developed and offers an experience of a more primitive nature."*

*SPECIAL QUALITIES OF CUMBERLAND ISLAND: "...The establishing legislation specifies that no causeway be built to Cumberland Island and that access continue to be by boat. This constraint provides a novel opportunity to monitor, to some degree, almost every facet of visitor use. The number of visitors and points of entry onto the island are completely controlled, and visitor activities and impacts can be at least partially regulated by availability and scheduling of National Park Service transportation, time constraints on visitor movement into surrounding areas, and availability and variety of visitor services...."*

## 2. Bike and E-Bike Access (Wilderness)

Wild Cumberland recognizes that an increasingly aging American population has embraced e-bikes as a means of continuing to experience the outdoors. However, our predecessors *predicted exactly this* when establishing the 1964 Wilderness Act:

*"Mindful of our "increasing population, accompanied by expanding settlement and growing mechanization," Congress passed the 1964 Wilderness Act in order to preserve and protect certain lands "in their natural condition" and thus "secure for present and future generations the benefits of wilderness." 11 U.S.C. § 1131(a).*

The current phrasing of "authorized roads" regarding expanded bicycle use, along with the plan's map (page 35, Figure 7), suggests that bicycle use will be permitted on the following roads in Wilderness (which are presently open to limited motor vehicle use by reserved rights holders and NPS emergency vehicles):

1. *South Cut Trail;*
2. *Cedar Dock Road;*
3. *"Whitney Road" leading into Sweetwater Lakes/Whitney Lake/Rollercoaster Trail; and*
4. *The road north of Plum Spur/Table Point Road.*

**Please clarify that the NPS is not attempting to authorize bike use in Wilderness by correcting the map and changing the phrasing from "Administrative" to "Public".**

Allowing bikes and e-bikes to use the Main Road certainly contrasts with the purpose and design of the Wilderness Act; however, opening administrative roads to bikes and e-bikes in designated Wilderness is an explicit violation of the Wilderness Act and a deliberate act to undermine Wilderness protections that destroys Wilderness character. Wild Cumberland would assert that without these corrections, regulations have been intentionally misused to promote and allow uses that are prohibited in Wilderness.

It is imperative to remember that simply because the Main Road *can* be used for vehicles doesn't mean the Main Road was ever *intended* to facilitate any additional use beyond limited

Congressionally-required tours, limited administrative use, and limited residential use. *Nor* does it mean that the NPS can shirk its responsibility to consider impacts on its surrounding Wilderness - including increased and different types of use (such as bikes and e-bikes).

CUIS management should not be proceeding with any pre-decisional planning processes that considers ebike use until the NPS completes a proper rulemaking NEPA process. (see *Pub. Emps. for Environmental Responsibility v. National Park Serv., Civil Action No. 19-3629 (RC), 2022 U.S. Dist. LEXIS 93204 (D.D.C. May 24, 2022)*)

- The additional risks and impacts from ebike operation risks adjacent to and within the Wilderness have not been properly evaluated. **Additional Wilderness impact assessments are necessary to allow bikes and e-bikes within Cumberland Island National Seashore, even outside of Wilderness, because they impact Wilderness values.**
- NEPA requires agencies to consider reasonably foreseeable impacts “that have catastrophic consequences, *even if their probability of occurrence is low.*” (40 C.F.R. § 1502.21)
  - Ebike transport and operation may present additional **increased fire and/or explosion risks to the ferry operator and visitors, the Seashore, and its Wilderness that have not been properly evaluated.**
  - Ebike fires are typically caused by the lithium batteries that power them.
  - Lithium batteries include a highly combustible electrolyte fluid that can catch fire if the battery is overheated, damaged, or otherwise faulty in its construction. This can create a chain reaction that causes the battery to explode and create toxic gas.
- Secretary's Order 3376 may allow e-bikes wherever standard bikes are allowed, *however*, this order still empowers park superintendents and land managers to limit, restrict, or impose conditions on bicycle use and e-bike use as necessary to manage public health and safety, natural and cultural resource protection, and other management activities and objectives.
- The proposed Visitor Use Management Plan takes the *presumptive* position that proper environmental assessment was previously done for bikes and e-bikes, and it was NOT. Bicycle access was only mentioned in the 2009 North End Transportation Management Plan except as a practice allowed to continue. *The 1984 GMP (p. 38) states, “The use of vehicles, horses, bicycles, or other forms of transportation will not be allowed except as identified in wilderness legislation (Public Law 97-250).”*
- Potential social trail development and their impacts are not addressed in this plan but are easily identifiable, particularly in areas including North Cut Rd and South Cut Trail; Kings Bottom Trail; and Duck House Trail.
- The proposed plan states, “*Given the natural environment, it is unlikely that e-bikes will be used extensively on the island because sand and salt may damage the relatively expensive motors.*”
  - Wild Cumberland knows this to be inaccurate, based on firsthand observations; the majority of personal bikes being transported on the ferry in 2022 are e-bikes (80/20 ebikes/bicycles). Previous e-bike supply chain issues have eased, and generous financial incentives have been established to facilitate increased public ebike use.
- The proposed plan imposes a limit of 100 bikes and/or e-bikes per day, but numbers **do not** reflect recreational boaters who bring their own bikes, residents’ bikes, or bikes associated with established commercial uses (Greyfield Inn, Stafford). **Further, independent charter services have previously acknowledged their interest in transporting bicycles:**

<https://www.onlineathens.com/story/news/state/2014/03/21/fate-georgia-island-ferry-key-issue-coast/15538072007/>

- The proposed plan also specifically authorizes 15 bikes (an increase from the current 10 per vessel currently contracted) transported per vessel, but total vessel numbers are unspecified.
- The plan also authorizes an additional 25 bikes available for rental on island, but does not specify impact analysis, management details, or safety solutions. Type(s) of bikes are undisclosed.
- The plan does not limit bicycle transportation services to its concessioner.
- Many bikers are seeking a similar experience as hikers, but the ways in which people choose to seek that experience can, and will, cause unnecessary and avoidable conflicts. This is particularly relevant given Cumberland Island's feral horse population, which is an additional factor in visitor safety that is not evaluated in the plan (Appendix K).
- Can Georgia state bike laws be safely enforced on a one-way road?
- The plan indicates that 15% of visitors self-report using bikes; we can reasonably anticipate demand for bike rental and/or access will continue to increase. This plan does not address how and where any impacts, potential increases in numbers, or mitigation may be evaluated or implemented.

Again, NPS seems to have selectively avoided guidance from its own approved General Management Plan:

- *"Travel on the Island... Trails in most instances will be along existing roads. **Many roads, however, will be excluded from the trail system and allowed to revert to a natural state**" and "The most southern part of the historic Main Road will remain the primary north-south route, with short existing side spurs leading to the improved campgrounds, and **it will remain in its present condition, a narrow, shell-base (in places) road.**"*
- *"The use of vehicles, horses, bicycles, or other forms of transportation will not be allowed except as identified in wilderness legislation (Public Law 97-250). P 38"*

Wild Cumberland would also seek a commitment from NPS management that Grand Ave./the Main Road on Cumberland Island **will be maintained in its historical condition -- there shall be no widening or paving to facilitate increased vehicular or bike use now or in the future.**

### **3. Water Quality in Wilderness**

The Plan will significantly affect limited freshwater resources on Cumberland Island. Impacts to freshwater resources have not been properly evaluated in the Plan or Environmental Assessment. Increased visitation, development, infrastructure, and increases in waste and withdrawal will have significant impacts to water quality and availability, especially for wildlife.

Cumberland Island National Seashore and Wilderness has the greatest diversity of habitats and biotic communities of any barrier island. The limiting resource for many of these species and communities is freshwater. The island supports freshwater lakes, ponds, and sloughs with highly fluctuating water levels. Regional declines in the Upper Floridan Aquifer in coastal Georgia are well documented (USGS 38).

The hydrological impacts from existing cones of depression along the Georgia and North Florida coasts render approximately 50,000 people in Glynn and Camden Counties vulnerable to freshwater pollution and saltwater intrusion.



Fresh water pollutant levels have exceeded National Primary Drinking Water Standards at Whitney Overflow (USGS 17-18), where feral horses often congregate. In 2018, the NPS released its Natural Resource Condition Assessment for Cumberland Island National Seashore: ground and surface water sources were sampled for parameters that included pH, Dissolved Oxygen (DO), and nutrients, but bacteria was not studied — even though there are known concerns of bacterial contamination due to frequent wildlife use.

Climate change is expected to affect freshwater resources on the island, and increasing storm intensity and frequency may alter island hydrology. Increasingly higher tides are already leading to more inundations of interdune freshwater (USGS 34).

Natural breaches in dune systems may become more common, leading to the loss of interior lakes and ponds and saltwater intrusion into sensitive freshwater ecosystems. **Human breaches in these highly-protected dune systems have been documented as recently as 2021.**

Saltwater intrusion is especially prominent in the shallow south end aquifer (USGS 4). In addition, the south end freshwater systems are the most vulnerable to saltwater intrusion. Already, they have the highest salt content of any surface water on Cumberland Island. The South End Ponds occasionally record salt levels higher than seawater (USGS 35).

Insufficient water quality testing in common [visitor access areas](#), Wilderness, and Potential Wilderness have been identified as existing management concerns. Ultimately, all of the following have been documented as known issues pertaining to water quality within the Seashore and are inadequately addressed in conjunction with changes proposed in VUMP:

- Saltwater intrusion (Allen et al. 2018)
- Aging septic systems of structures on the island (Alber et al. 2005)
- Industrial pollution in mainland watersheds, which impact the rivers and wetlands of the wilderness (Alber et al. 2005)
- Organic matter input, invasive species spread, trampling, and nutrient input by large feral mammals (Noon and Martin 2004, Allen et al. 2018); and
- Eutrophication due to wet deposition of air pollutants (nitrogen and phosphorous);
- Dredging of the Intracoastal Waterway (Alber et al. 2005)

#### **4. Visitation & Visitor Experience (General)**

Wild Cumberland understands that Americans are seeking increasingly more remote and secluded experiences – and places like Cumberland Island National Seashore and Wilderness will face an ever-increasing demand for the unique opportunities it provides for transformation, respite, and rejuvenation.

The Seashore, as reflected in its originating legislation, is intended to be a primitive experience for ALL visitors - not just those who seek a Wilderness experience. The proposed plan undermines that intent and experience.

- The NPS has not documented the need or justification to more than double the daily visitor limit in the proposed VUMP. It also fails to acknowledge documented history that the current visitor capacity was not developed based solely upon ferry capacity, but with public feedback and with resource protection in mind.

- The 2022 VUMP focuses on the concept of increasing visitation without presenting substantive evidence that the current 300 per day limit is insufficient in meeting visitor demand.
- The proposed plan touts research that visitors experience “low to moderately low” levels of crowding at key destination sites (Brownlee et al. 2019); this experience exists and is consistent because of the controlled access points and visitor restrictions employed by management at the time of research.
- The 2022 VUMP/EA repeats the survey finding made in 1974 that visitors expect “visits to Cumberland Island should be a rare experience that does not duplicate similar visits to other coastal islands such as Jekyll Island and neighboring beaches to the south.” (VUMP P 104).
- The number of camping permits will increase: Sea Camp will increase from 112 to 130, and opening Beach Creek and Hunt Camp will result in up to 72 camping permits — doubling the current number of campers at one time without analyzing impacts to adjacent Wilderness.
- The plan offers no data on how weather affects visitors’ reservations or demand.

### 5. Socioeconomic & Environmental Justice Concerns (General)

There are inadequate details in this plan about ways the Seashore intends to facilitate use or improve access by historically-marginalized groups by increasing visitor numbers. It simply facilitates more access to the same demographic of users. Without significant changes to current Seashore fee structure, concessionaire fees, and/or other initiatives, the demographics of the park will remain more of the same.

- Campsite and entrance fees for Cumberland Island have increased significantly just in the last decade:
  - In 2012, the CUIS entrance fee was only \$4; Sea Camp camping site fees were \$4 per night; and the adult ferry fee was \$20 round trip.
  - In 2022, the CUIS entrance fee was \$10; Sea Camp camping site fees \$22-40 per night; and the adult ferry fee \$34 round trip. *(All prices pre-tax.)*
  - The concessionaire has announced a **rate increase since this plan was released for public review (effective 1/1/2023).**
- The proposed plan acknowledges the likelihood that ferry costs may **increase** as the concessionaire adjusts for increased operating costs.
- The proposed plan states clearly, *“Proposed development in St. Marys and Camden Spaceport may increase visitation...as a result, the town may need to develop additional accommodations such as lodging and dining that could provide economic benefit to the gateway community and local stakeholders. At the same time, this increase in development and potential growth of the area may lead to changes in local economics that could increase associated prices of traveling and the ferry prices. Consequently, **the socioeconomic barriers to visitation may increase or remain the same.**”*
- It facilitates increased access by recreational boaters, but they are not the population that has historically been excluded from access to our public lands.
- An increased offering of commercial services is not only contrary to the Seashore’s intent, it may create additional barriers for some visitors.
- The proposed plan’s assessment (VUMP p.80) that “visitor access to Cumberland Island would be improved due to an expansion of visitor services offered and with the addition of facilities and supplies on the island” does not align with park and visitor values.

### 6. Proposed Commercial Use & Services (General)

The 1984 General Management Plan specifies that “No concessions will be permitted on the island.” (P 36)

- Clearly the proposed plan does not align with the intent of the Seashore nor its management guidelines. **Would the General Management Plan require amendment to allow this drastic change?**
- The proposed plan does not include any relevant use numbers or potential impacts for any of the proposed new uses created under this plan; nor does it reflect existing commercial uses (Greyfield Inn and Stafford) for proper public consideration.
- Specific details are NOT provided on proposed location, size, or potential environmental impacts from construction and/or operation of ANY of the proposed operations, including an island-based retail store, boat rentals, motorized or non-motorized boat tours, etc. A detailed environmental analysis would be required for proper evaluation.
- Vehicle-based tours (South End Shuttle) - There are insufficient data provided in this plan for cumulative evaluation. This element is briefly covered under a separate plan, the 2009 North End Transportation Management Plan. Further, the Finding of No Significant Impact (FONSI) is NOT available online for public review.
- The closest data provided to establish any need for expansion of services is stated within the plan as follows, “Members of the public, park staff, and potential visitors **occasionally** suggest that the park consider providing additional visitor uses and services either through commercial use providers or through NPS facilities.” (VUMP p 9-10)

## 7. Ferry Service & Recreational Boater Concerns (General)

More frequent, increased passenger ferry boats will be implemented at peak visitation times — which coincides with peak season for the many threatened and endangered marine species who inhabit the waters surrounding Cumberland Island, including sea turtles, manatees, North Atlantic Right Whales, sturgeons, and more.

- Charter services to Cumberland Island are listed in the proposed plan without critical details to properly evaluate impacts. A water taxi service is also listed, but specific details are again omitted.
- The proposed plan actively increases, but does not thoroughly evaluate, impacts from increased recreational boat use. The increase in daily visitor numbers (700) reflects *only* ferry passenger delivery.
  - The proposed plan reflects numbers that the NPS has established for maximum use without resource degradation, but does NOT include a restriction on capacity.
  - There is **no** daily threshold capacity that reflects the \*numerous\* ways that people will arrive to the island based on this plan (recreational boats, water taxi, charter services, commercial use, etc.).
  - There is an increased number of recreational boaters on the waterways adjacent Cumberland Island.
  - Ever-shifting access boundaries for boaters on the South end will require near-constant monitoring and staff for proper enforcement. No public safety measures are reflected in this plan.
  - There is no proper interpretation opportunity for this specific user group; signage has proven to be woefully inadequate in preventing damage to the resource. The signage will also obstruct others' views and detract from their visitor experience.
  - These changes will contribute to increased noise and light pollution (no relevant data relating to thresholds or adaptive management strategies for this element are included in this plan from the NPS Night Skies and Sounds division).
  - The proposed plan facilitates direct access to Wilderness by mechanization (motorboats) by selectively employing concurrent jurisdiction with the State of Georgia.

- Opening additional tidal creeks on Beach Creek to motorboats does not benefit *any* of the species who depend on it for sustenance or shelter; “no wake” signs are not strong enough measures to protect imperiled species. The result of these changes creates a “protected” bird area on the south end, flanked by motorboats and a campsite on one side, and a constantly-shifting recreational boat landing zone on the other.
- The South End Beach (Vessel Landing Zone or “VLZ”) will result in the direct loss of critical beach-nesting bird habitat through the entire 1,900 foot zone, and indirectly into adjoining “protected” habitat due to an increased and/or concentrated volume and frequency of pedestrian traffic and associated recreational activities.
  - This zone would also foster direct and indirect threats to the adjoining “closure area” immediately west of the landing zone, north along ocean beach to jetty, and South Beach — all of which represent critical WIPL and WILL nesting habitat as well as PIPL and REKN critical habitat.
  - The VUMP fails to adequately address if or how recreational impacts will be contained within the Vessel Landing Zone (VLZ) or restricted beyond the zone’s boundaries.

## 8. Zoning Change Concerns

The accuracy and implications of zoning changes proposed in the plan lack sufficient information for proper evaluation. Further, Wild Cumberland is unaware of any map established since the 2004 boundary redraw that depicts a rational alignment relative to on-the-ground features and landscapes of a legal description of the boundaries (required under Director’s Order 41) that would allow any changes in use or zoning. Specific concerns include, but are not limited to:

- Removal of Potential Wilderness designation on a parcel south of Stafford (NPS 2014 Foundation Document P55) to a Special Interest Zone without supplemental details.
- **The establishment of a new Development Zone** on the fringe of designated Wilderness (Hunt Camp/adjacent to a historical zone) lacks sufficient analysis. This proposed change is further complicated by the fact that this Historic Zone is already in the “middle” of a linear Wilderness bisected by a road.
- If the “Private Interest Subzone” “...includes reserved estate properties on Cumberland Island where the relevant parties, upon selling their property to the federal government, were granted rights of use and occupancy,” (VUMP P16), the zoning map and chart as provided in the proposed VUMP are inaccurate:
  - Retained estates are not reflected as “Private Interest Subzone” for High Point or retained estates in the area of Halfmoon Bluff.
- The table reflects removal of Natural Environment Subzone & Historic Zone designations for Greyfield, yet the map indicates it remains a historic zone; implications are omitted.
- The **Environmental Protection Zone** on the South End is described, “*In the environmental protection zone, infrastructure includes only that which fulfills a critical need based on the need to protect resources where other mitigations are not feasible or practical.*”
  - Wild Cumberland believes it is both feasible and most impactful to limit visitor access to the entire area, and that visitor access is not a critical need. Establishment of a boat landing area and an additional campsite (Beach Creek), and allowing motorized boats, increases access within close proximity to critical habitat — this is a counterintuitive conservation attempt that only results in a slight increase in revenue, a significant increase in staff, and need for increased ongoing funding.
  - It seems necessary to also identify “development zones” within the new Environmental Protection Zone to reflect planned use of Nightingale Beach and Dungeness Pavillions, Beach Creek Campsite, and the South End Vessel Landing Zone (VLZ).

The proposed VUMP says, “*The VUM plan is needed to establish a vision to manage visitor use at the park. It will evaluate access to and around the island, as appropriate, that allow for **optimal** resource protection and visitor experience.*” (VUMP P226).

- Unfortunately, the term “**optimal**” is not defined by the NPS. Limitations to accessing the resource/this site have been, and should continue to be, utilized as a protective mechanism, not an exploitative one.

Management is using this opportunity to establish newly-defined “desired conditions” through a visitor-centric planning process, resulting in a deviation from the original legislative intent of the Seashore to become an increasingly wilder, more intact barrier island Wilderness.

- The “desired conditions” established in the proposed plan are based on park staff’s own interpretation of previous plans (some of which were never approved or implemented). The definition of “desired conditions” provided in the NPS’ proposed VUMP glossary reads: “*statements of aspiration that describe resource conditions, visitor experiences, and opportunities, and facilities and services...*”.
- However, Wild Cumberland is unaware of any established management or development guidelines that may exist for NPS managers to accurately assess and define “desired conditions”, leaving them open to bias.
- “Desired conditions” for public lands - especially a site like Cumberland Island - should incorporate the *physical* things and related processes that stakeholders, including park managers, want to see on lands or waters. In other words, “desired conditions” should describe what the resource condition will be, not how it is managed.
- Desired conditions have to be distinguished from other management concepts (such as visitor use) and should be related to resource conditions (think “natural,” “optimal,” “impaired,” or “integrity”). They are separate from historic or current conditions, and can absolutely be defined as “natural”, or free from human dominance.

**To ensure that our natural resources remain unimpaired for future generations, desired conditions should ideally:**

- describe conditions and/or processes as they will exist in the future, under reasonable scenarios
- build on existing or historical conditions
- include structural compositional and functional descriptors, a dynamic range of conditions, and process rates, and the amount of fluctuation within those ranges
- apply to a specific management unit or resource context
- address the spatial, temporal and ecological scale issues relevant to focal resources
- establish a framework and purpose for subsequent management actions & projects; translate into operational objectives which are achievable within management constraints
- need to be both realistic and achievable, but normally not in the short term
- are based upon a documented analytical framework that identifies and supports underlying assumptions
- include measurable benchmarks for operational objectives, including hypothetical ecological and management thresholds
- make use of existing condition assessments, particularly in the surrounding landscape, and the ability of the park managers to influence landscape conditions over time
- take account of irreversible ecosystem changes and limitations imposed by park boundaries or other variables

- identify expected outcomes that are derived from goals

**Desired conditions should not:**

- prescribe or compel specific management actions or projects
- imply that compulsory actions or conditions must ensue
- only document current conditions or predict trends based on current conditions and passive management
- focus only on removal or mitigation of ecosystem stressors
- focus on specific outputs
- focus only on a single point in time or be constrained by short-term possibilities

Descriptions of desired conditions should create a picture of how a particular area will look, feel, sound, and function in the future. Unfortunately, the “desired conditions” developed by management in the proposed plan fall short of the resource stewardship Cumberland Island deserves.

**9. Exclusions, Errors, & Omissions**

There are no data included or publicly available to identify what necessitated the determination to increase visitor capacity. The NPS has not documented the need or justification to more than double the daily visitor limit in the proposed VUMP.

As of 11/30/22, the NPS had not submitted its VUMP and Environmental Assessment to GADNR for its required Coastal Consistency Determination, despite the plan’s intent to significantly increase beach visitation and recreational boat use, develop a new beach access through protected dunes, construct shade pavilions, a restroom and showers on land controlled by the Georgia Shore Protection Act, and to increase bike traffic on miles of environmentally sensitive beachfront.

In addition, the following plans or studies have **not** been accessible to the general public for review in conjunction with the proposed Visitor Use Management Plan:

- **Omitted: General Management Plan (1984)** - The proposed Visitor Use Management Plan serves as an amendment to the 1984 General Management Plan.
  - *“...in a small park, the important proposals may be presented in a single document; in a large park, it may be necessary to prepare associated plans for specific management and development actions. **These associated plans will not always be prepared concurrently with the general management plan but will be consistent with it.** General Authorities Act, October 7, 1976 (PL. 94-458)*
- **Omitted: Business Plan (2016)** *(has not been shared with the public - provided under FOIA request on 12/27/22)*
- **Omitted: Housing Study (date unknown)**
- **Omitted: Land Protection Plan (1994)**
  - CUIS has received funding provided by the Land Water Conservation Fund (LWCF) and Great American Outdoors Act (GAOA,) to facilitate improvements, land exchanges, and land acquisitions that are not reflected in the proposed Visitor Use Management Plan and EA. Any potential impacts and changes from acquisition or exchange of public lands should be clearly detailed in this plan in order for the public to consider **all** possible implications.
- **Omitted: Long Term Interpretation Plan (2017)** *(has not been shared with the public - provided under FOIA request)*
- **Omitted: Wilderness Character Baseline Assessment (unpublished, 2021)**

- **Omitted: Former Reserved Properties Management Plan and Environmental Assessment (July 2012)**

The following plans are relevant and referenced within the body of the document, but are NOT referenced in the appendix of the proposed Visitor Use Management Plan and EA for public evaluation:

- **2018 Natural Resource Condition Assessment (NRCA):** This is the most recent attempt at a comprehensive study on the natural resources of Cumberland Island. It clearly identifies the data gaps and lack of information that would be necessary to proceed with any iteration of changes that may be proposed in this plan.
- **2009 North End Access & Transportation Management Plan (TMP):** This Plan covers vehicular tours and shuttles; there is a mention of bikes as a practice allowed to continue. The FONSI is NOT available online for this plan.
  - Specific details, including schedules, for shuttles and tours were not presented in the North End Transportation Management Plan and appear to be undeveloped; any implications to the proposed plan cannot be properly evaluated with the limited information available.

The following topics are equally relevant to note as deficiencies within the proposed plan:

- **Excluded from Further Analysis: Feral horses** were excluded from consideration in the proposed Visitor Use Management Plan (Appendix K). We believe the safety implications of more than 700 visitors per day and potential risks associated with the island's feral horse population should absolutely be evaluated. The horses' documented and ongoing degradation of island ecosystems were not considered in conjunction with an increase in visitor impact in any environmental analysis.
- **Omitted from Evaluation: Visitor Safety** issues are not addressed in the plan, including but not limited to: feral horses, Hurricane Safety Plan impacts, visitor parking, and unmonitored access.
- **Omitted from Evaluation: Climate Change** is not acknowledged or evaluated in correlation with any proposed changes — except for this: *“Further, the proposed action proposes very little infrastructure in an area that is anticipated to be affected by sea level rise and climate change.” (VUMP P229).*

#### 10. Other Projects / Impacts NOT Identified in this Plan

- **Existing/Current Projects:** CUIS has recently received funding for (and has already begun) projects within the boundary of the Seashore for projects that are NOT referenced, included, or integrated into this plan for the public to consider in its contextual assessment. These projects include, but are not limited to:
  1. Sea Camp Ranger Station Rehabilitation
  2. Sea Camp Campground Bathroom Renovation
  3. Grand Ave/Main Road Grading and Repair
  4. Three separate funding installments for renovation of the Grange
  5. Shoreline Restoration (grant received)
  6. Mainland museum renovation
- **Insufficient Resources to Employ an Adaptive Management Framework:** Funding deficiencies, the need for trained staff, and other factors can hinder NPS managers from taking timely and necessary action, negatively impacting both the resource and visitor experience. Insufficient political will and organizational ability to implement adaptive frameworks can lead to

the misapplication of concepts and ideas. NPS action is often further constrained by the political and socioeconomic environment in which a particular park unit is located.

- The proposed plan uses modeling based on forecast and projections, but no integration of scenario planning.
  - How would adaptive visitor management strategies be realistically employed by the NPS, particularly at this unit? Given the proposed plan's lack of clear, data-driven metrics and benchmarks, adaptive management is not appropriate for CUIS.
  - The proposed plan does not identify the potential effects on CUIS operations, such as increased requirements for on-island staff for maintenance, vehicles, ranger patrols, services, resource monitoring, mitigation, interpretation, administrative oversight, and facilities and infrastructure.
    - These changes will directly impact every visitor experience, particularly given the limited transportation routes available for staff, volunteers, and visitors.
  - The proposed plan lacks the necessary details for the public to fully evaluate the drastic changes that would be required in park staffing and housing. It is widely-known and well-documented that the NPS is experiencing issues staffing, funding, and housing the types of diverse experts needed to employ adaptive management strategies effectively and accurately across our entire system — **Cumberland Island will be no exception.**
- **Potential Private Development On Island:** The potential rezoning and residential development of nearly 90 acres (Lumar, LLC) immediately adjacent to Sea Camp on Cumberland Island is *not* addressed in this plan. This will have a direct impact on recreational boat and vehicle use, and a possible impact to visitor services; the proposed plan lacks sufficient data for evaluation.
  - **Adjacent Growth and Development Concerns:** Planned residential, marina, and port developments in adjacent communities (Fernandina, FL and St Marys, GA) will have a direct impact on recreational boat use; the proposed plan lacks sufficient data for evaluation. While the plan says these developments have been considered, increasing ferry service and recreational boat access to the Seashore increases threats, risks, harms, and the potential take of at-risk species. There are additional factors that the NPS had not considered:
    - **Long-term mooring permits** are now allowed in Georgia waterways (based on increased demand/need); this will have a direct impact on recreational boat use; the proposed plan lacks sufficient data for evaluation.
    - There is no longer a Georgia/DNR budget line item or funding source for the **removal of derelict boats** in our waterways. The state of Georgia does NOT require boater's insurance, so boats are more often abandoned in the water than removed when an incident occurs. These abandoned boats create safety hazards for boaters, kayakers, anglers, commercial operations, and threatened and endangered wildlife.
    - The NPS shares **concurrent jurisdiction** with the state of Georgia, which often allows parties to selectively absolve themselves of responsibility related to the waters in, surrounding, or adjacent to the Seashore and its Wilderness.
    - **Proposed growth of the Fernandina (FL) Port into the passenger excursion arena:** the Port Master Plan has now added "economic development with Camden County" to its scope. A 60' passenger terminal is planned on the Fernandina-Amelia River, along with tours already booked for 1200-passenger ships.
      - Fernandina is touted as an "excursion" port of call - which means those 1200 people are seeking experiences beyond Main Street. The port plan also discusses developing a ferry service to St. Marys and outlying areas.



- **Spaceport Camden:** The public was unaware of the details included in this plan when Spaceport decisions (votes) were made, and the environmental analysis for Spaceport Camden did not include the changes that this plan proposes.
  - The NPS had a moral obligation to disclose the details of any plan that increased safety risks with the public during that process, misleading the public (particularly local voters) by not doing so.

## 11. Special Status Species

More than doubling the number of annual visitors will have a significant impact on federally-listed species and their habitats. Expanding visitor uses of the island, motorized access to the island, and development of the island will also have significant impacts to species. NPS' evaluation of potential impacts to the species and/or ecosystems within the Seashore is both indifferent and dismissive.

Wild Cumberland opposes any and all visitor-centric changes or accommodations within the proposed plan that would result in the potential degradation or harm to any special status species and/or their habitats, short or long-term.

We have an obligation to prevent any additional threat or harm to these species, and many (if not all) of the actions proposed in this plan will have a direct and negative impact on the special status species identified within the proposed plan. Simply "minimizing risk" is NOT an acceptable approach for an agency who is charged with the long-term protection of our public lands. This responsibility is made clear in the agency's own management policies:

*"The Service will fully meet its obligations under the NPS Organic Act and the Endangered Species Act to both proactively conserve listed species and prevent detrimental effects on these species. To meet these obligations, the Service will:*

- *Cooperate with both the U.S. Fish and Wildlife Service and the NOAA Fisheries to ensure that NPS actions comply with both the written requirements and the spirit of the Endangered Species Act.*
- *undertake active management programs to inventory, monitor, restore, and maintain listed species' habitats; control detrimental nonnative species; manage detrimental visitor access; and reestablish extirpated populations as necessary to maintain the species and the habitats upon which they depend;*
- *manage designated critical habitat, essential habitat, and recovery areas to maintain and enhance their value for the recovery of threatened and endangered species" (4.4.2.3)*

We can also reasonably anticipate the identification of additional threatened and endangered species or critical habitats within the boundaries of Cumberland Island National Seashore:

- Ex.: Tricolored Bats (*Perimyotis subflavus*) Wild Cumberland would encourage the NPS to consider potential impacts to tricolored bats now, as a species currently proposed for ESA protection by the US Fish and Wildlife Service.
- US Fish and Wildlife Service identified 55 birds in the proposed action area that are of particular concern because they occur on the USFWS Birds of Conservation Concern list or warrant special attention in the project location (USFWS 2019a).

The Environmental Assessment (Appendix C) and Biological Evaluation in (Appendix G) fails to measure and fully analyze these impacts to species and their habitats. The NPS also failed to complete a full consultation with U.S. Fish and Wildlife Service and National Marine Fisheries Service as required by

Section 7(a)(1) of the Endangered Species Act. Its in-house Biological Evaluation fails to meet Section 7 Endangered Species Act requirements.

## 12. Invasive Species Concerns

There are no data or mitigation included in this plan to properly minimize and address the increased risks related to the introduction and spread of invasive species within the Seashore, despite the plan acknowledging that increased visitors, hikers, bikers, and boaters will increase potential spread and/or introduce new species.

## 13. Support for Parts of the Plan

Wild Cumberland strongly supports the addition of NPS Wilderness Rangers to full-time staff, as well as improvements in interpretive programming. We support Toonahowie as a Wilderness campsite choice because it is in a previously developed area; *Wild Cumberland cannot, however, endorse access to the Wilderness by any means of mechanization, including motorboats.*

- The National Park Service should exercise its right to enforce its jurisdiction beyond the high tide line to maintain compliance with the Wilderness Act, for the integrity of the resource, and to ensure visitor safety. This recommendation also applies to the Brick Hill campsite location, which is identified in this plan as also permitting motorized boat access to Wilderness; in addition to the NPS' general regulatory authority, the Seashore Act gives NPS regulatory authority over non-federally owned lands within the bounds of Cumberland Island National Seashore.

## Conclusion

Wild Cumberland appreciates the National Park Service for developing a Visitor Use Management Plan for Cumberland Island National Seashore and Wilderness. However, Wild Cumberland finds the 2022 proposed Visitor Use Management Plan and Environmental Assessment out of compliance with federal law and NPS' own management objectives/standards and completely deficient in the necessary data, mitigation measures, and cumulative impact evaluations required to be properly considered by the public at this time.

- **Wild Cumberland recommends that the NPS chooses the “No Action” alternative and completes a Wilderness Management Plan (WMP)** before proceeding with an EIS for any Visitor Use Management Plan. A WMP is necessary before making any changes in visitor use; without established "desired future conditions" and a carrying capacity for wilderness areas (as established by a WMP) the agency cannot determine acceptability of predicted impacts.
- **The proposed VUMP and its EA should be revisited using a full Environmental Impact Statement (EIS).** Significant changes are being proposed to nearly every aspect of the Seashore in this plan; an EIS is the minimum appropriate level of review for the scope of actions in the proposed plan. The proposed plan also fails to meet NEPA requirements, providing only a no-action alternative and second alternative. It included no incremental alternatives and only provided its preferred alternative, choosing to dismiss from further consideration many options that have widespread public and scientific support.

Perhaps most importantly, **the proposed VUMP undermines the Congressional intent for Cumberland Island National Seashore.** Its original "desired future conditions" were purposely designed to keep the island in its primitive state, enabling the NPS to protect and manage it as a place where uses would diminish, not increase, over time. It was intended by Congress, its enabling legislation, and the Wilderness Act to gradually evolve into an increasingly wild, less-developed island. As retained rights expired, more of the island was intended to revert to its natural state. The proposed plan moves in the

opposite direction: it expands development, accommodations, and commercial activity on one of the wildest and most biologically diverse islands in our country.

Most of the Seashore's visitors are seeking solace from an increasingly fast-paced, technology-driven, commercialized society. Cumberland Island was **designed to be different** — to be preserved in its most primitive state and protect space for those seeking natural resource challenges and a more primitive, often solitary, experience.

NPS management is *not* empowered by the public it serves to work toward any future it wishes, removed from accountability, until all memory of what used to be fades. Cumberland Island presented a rare opportunity to prevent further degradation and slowly reduce human intrusions on the primitive experience available to the public.

This plan may be disguised as a desire to improve accessibility, but it actually promotes reliance and, one could argue, actively *discourages* self-reliance. There are numerous parks and public lands within close proximity of Seashore - many of which feature water-based access, have fewer restrictions and offer endless amenities.

The only party who appears to benefit from the prioritization of the proposed Visitor Use Management Plan as it stands seems to be private or commercial service operator(s), with an intense expansion of visitor services. (Though the plan does require a substantial increase in law enforcement personnel, which should be taken into careful consideration given documented disparities in treatment of communities of color by law enforcement.)

We urge the NPS to re-examine its proposed Visitor Use Management Plan and Environmental Assessment for consistency with applicable laws, executive orders, regulations, and policies; consistency with existing plans for public use and resource management; actual and potential effects on park resources and values; total costs to the Service; and perhaps most importantly, whether these changes align with the Seashore's original intended purpose. It is imperative that we maintain the integrity of the Wilderness values and characteristics that Cumberland Island was established to cultivate — and the proposed plan does NOT do that.

If we don't exhibit the restraint necessary to ensure that places like Cumberland Island remain undeveloped now -- none will remain in the future.

Thank you for the opportunity to comment; we are eager and available to work with the National Park Service on an improved Visitor Use Management Plan that prioritizes the Congressional intent of the park and long-term resource protection.

Sincerely,

Jessica Howell-Edwards  
Executive Director  
Wild Cumberland

## Alternatives & Suggestions

Wild Cumberland believes there are numerous management strategies that could, and should, be considered in conjunction with any proposed Visitor Use Management Plan, including:

- A **Wilderness Education Plan** must be implemented prior to, and in conjunction with, any potential increase in visitation, access changes, or types of use.
- Provide access to the **NPS Visitor Center** in St Marys before and after ferry hours; this has been a consistent visitor request for decades.
- Develop a robust education/outreach program targeted to **recreational boaters and anglers**. These users are unable to go through proper park interpretation based on their means of travel and originate from more than one state at all times.
- Facilitate **Citizen Science** opportunities that engage the community and stakeholders in a way that is meaningful to resource protection.
- Ensure there is a **park ranger present on every boat** transporting visitors to and from the island.
- Consider an **overall reduction in on-island vehicular speed limits** due to an increase in vehicular (South End Shuttle and residential), foot, and bike traffic to ensure wildlife protection and visitor safety.
- Facilitate the ability for a concessionaire to establish and run a store **on the mainland** with extended hours to meet the demand of increased recreational boaters and an extended ferry schedule.
- Publicly define all stakeholders. Develop and implement a **stakeholder engagement plan** to seek regular input from community stakeholders on CUIS management issues that directly or indirectly affect the local community.
- **Form informal partnerships and Memorandums of Understanding with public and service organizations** that conduct scientific, social, and historical research and programming not currently provided by NPS.
- Position the **Sweetwater Lakes Wilderness campsite** slightly further north, near Cedar Dock, to reduce adverse impacts and degradation to delicate freshwater wetlands and numerous resident and migratory species.
- Provide a timeline for the development, approval, and implementation of an **Air Transportation Management Plan**, because measures to address commercial use of public airspace, infringement upon Wilderness character, and/or impacts on the visitor experience are not addressed in this plan.
  - Low-flying aircraft were identified as an issue the park needed to actively address in its original 1984 General Management Plan; to date, no data is being tracked that would facilitate the development of this plan.
    - 2006 Management Policies direct that park managers will “(1) *identify what levels and types of sounds contribute to or hinder visitor enjoyment, and (2) monitor, in and adjacent to parks, noise-generating human activities—including noise caused by mechanical or electronic devices—that adversely affect visitor opportunities to enjoy park soundscapes. Based on this information, the Service will take action to prevent or minimize those noises that adversely affect the visitor experience or that exceed levels that are acceptable to or appropriate for visitor uses of parks.*” (NPS 2006, sec. 8.2.2).
  - There is an increasing amount of air traffic, including flight schools and commercial use by small air tour pilots; many of these frequently advertise their low-flying flights over Cumberland Island on social media.

Wild Cumberland recommends the following **accessibility suggestions**:

- Allow a portion of reservations to be made **more than six months in advance** to accommodate planning, travel, and other needs specific to the experience this resource requires.
- Provide **daily discounted admission** for local residents, first-time visitors, families with young children, and college students.
- Revisit the **“no cash accepted”** policy instituted by management in July of 2022.
- **Partner with local libraries** to provide free backpacks for check out, containing park passes, maps, native wildlife brochures, interpretation materials, and binoculars.
- **Establish an official “Friends” group** for the park, who can commit to fundraising for programs that will actively work to increase access for historically-marginalized populations, and facilitate community and stakeholder involvement both on and offsite. Cumberland Island National Seashore is one of only two National Seashores that do not have an official “Friends” group.
  - Prioritize initiatives to offset some of the costs of outdoor recreation for low-income visitors, including equipment costs, entrance fees, and travel costs.
  - This group would work in cooperation with the NPS to fund projects and programs that protect, preserve, and enhance Cumberland Island National Seashore.
  - This group would also help to source volunteers and advance educational programs and research projects. Promoting and enhancing public understanding of and appreciation for our public lands is critical to future stewardship.
- Identify and host inclusive public lands **events and programming** on park facilities on the mainland.
- **Increase interpretation staff** that are trained to ensure visitors safely and responsibly interact with the island’s sensitive ecosystems and species, and remain aware of the unique hazards of the island, instead of increasing law enforcement staff.
  - Wild Cumberland would like any proposed plan for CUIS to reflect a commitment to the priority of training staff on diversity and inclusion and a commitment to hiring rangers from more diverse backgrounds.