

February 11, 2026

Sent via Email to: [CUIS\\_Superintendent@NPS.gov](mailto:CUIS_Superintendent@NPS.gov)

Ms. Melissa Trenchik  
Superintendent  
Cumberland Island National Seashore  
101 Wheeler Street  
St. Marys, GA 31558



***RE: Comments on draft Cumberland Island National Seashore Visitor Use Management Plan***

Dear Superintendent Trenchik,

Thank you for the opportunity to submit comments on the proposed Cumberland Island National Seashore Visitor Use Management Plan (herein referred to as "VUMP"). These comments are submitted on behalf of One Hundred Miles (OHM), a nonprofit organization based in Brunswick, Georgia, with the mission of protecting Georgia's 100-mile coast through education, advocacy, and community engagement.

Although OHM generally supports increased public access to Georgia's 100-mile coast, after reading the draft VUMP, we are deeply concerned that the plan lacks sufficient management practices and enforcement measures to ensure the increased visitation will not harm the island's wilderness, critical wildlife habitat, and threatened species. Specifically, the draft VUMP does not adequately describe the adaptive management practices and enforcement actions that will be employed to avoid or mitigate the adverse impacts increased visitation will inevitably cause to habitats relied upon by Cumberland's sensitive and endangered species.

**Statutory Mandate for Preservation**

Cumberland Island National Seashore was established through federal law in 1972. The statute states,

*"...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, nor shall any road or causeway connecting Cumberland Island to the mainland be constructed."* (92-536 October 23, 1972).

In light of this mandate, the final VUMP for Cumberland Island National Seashore must clearly demonstrate that any increase in visitation (island-wide or within key locations) will remain fully compatible with the preservation of the unique assets of the national seashore. The VUMP must also clearly articulate the management tools, mitigation measures, and enforcement mechanisms the NPS will use to ensure this compatibility.

## 1) The VUMP lacks adequate beach management measures.

The most alarming deficiency in the draft VUMP is the **absence of ANY meaningful management practices or limitations on human activity on the beaches of Cumberland**. The VUMP must be revised to include specific mitigation measures for beach use that appropriately balance visitor experience with habitat protection.

OHM recognizes that the Georgia Department of Natural Resources (GA DNR) is statutorily obligated to manage activities on publicly owned beaches "landward from the ordinary low-water mark to the line of permanent vegetation" (§12-5-232(4)). However, Cumberland Island's beaches constitute critical habitat within the jurisdiction of the National Park Service (draft VUMP, page 3). The State of Georgia and the federal government share or concurrent jurisdiction of the Cumberland Island National Seashore, meaning the state may act only where such actions are consistent with federal purposes/use (16 U.S.C. Section 459i-6 and OCGA 27-1-11(a)).

Accordingly, NPS must not, nor is it in the best interest of the American people for the NPS to, abdicate management or enforcement responsibility for beach activity. Beach management on Cumberland Island should be a shared responsibility between the GA DNR and NPS.

### **OHM recommends the following mitigation measures to protect sensitive beaches and wilderness habitats:**

#### **1.a) Restrict or limit the use of e-bikes on public beaches.**

The draft VUMP acknowledges that critical habitat for the piping plover includes Cumberland Island's eastern shoreline and southern tip. It also acknowledges that "piping plovers are typically present from late July through mid-May" (draft VUMP, page G-40). **The document further recognizes that increased human activity in these areas will increase disturbance to these species beyond current levels, particularly during peak visitation periods.** Specifically, the draft VUMP states, "The presence of people and the ongoing use of bicycles and class 1, 2, and 3 e-bikes on the beach between Dungeness and Sea Camp can initiate aversive behavior in shorebirds or cause them to exert energy needed for migration as applicable or searching for food in these areas." (draft VUMP, page 56).

Both NPS and the Georgia General Assembly have recognized that beach driving harms wildlife and cultural resources. Georgia law restricts beach driving and requires state-issued authorization for motorized vehicle use on beaches (O.C.G.A. §12-5-248(a)). Although the Superintendent's Compendium allows e-bikes where traditional bikes are permitted<sup>1</sup>, e-bikes are, by definition, motorized vehicles. Their use on public beaches therefore warrants additional regulation, particularly in designated critical habitat areas.

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<sup>1</sup> <https://www.nps.gov/cuis/learn/management/superintendent-s-compendium.htm>

**OHM recommends** that the VUMP prohibits the use of all e-bikes on Cumberland Island's public beaches.

**1.b) Seasonally or permanently close private boat access to South End Beach (south of the jetty).**

The draft VUMP identifies South End Beach as critical habitat for numerous protected species, including West Indian manatees, Wilson's Plovers, least terns, and piping plovers (see "Effects to Evaluated Species and Determinations" beginning p. G-36).

The draft VUMP also recognizes that the South End beach is heavily used by private boaters, with peak visitation reaching up to 400 people per days, especially during the holiday weekends like July 4<sup>th</sup>, which coincides with critical season for piping plover and rufa red knot, federally protected species (draft VUMP pgs. G20 through G-22). The draft VUMP further notes a significant increase in visitation through private vessel (draft VUMP page B-15). The draft VUMP also noted that a 2019 scientific research project conducted by Brownlee et al was disrupted because South End Beach visitors vandalized and robbed observation equipment (VUMP page B-15).

**Visitation to Cumberland Island National Seashore should prioritize visitors seeking to experience natural and undeveloped environments over unregulated mass recreation that undermines wildlife protection.** Continued unrestricted private boat activity on South End Beach is incompatible with the protection of critical habitat.

On December 30, 2022, the U.S. Fish & Wildlife Service (USFWS) Project Leader Peter D. Maholland submitted a letter to Mr. Gary Ingram, past Superintendent of CINS, outlining the need for additional federal protections for South End Beach (See attachment A). The letter supports seasonal and potential year-round closures of the South End Beach and includes recommendations to prevent an unlawful "take" of protected species.

Despite the USFWS' support for the closures, the 2025 draft VUMP excluded consideration of any closure scenarios for South End Beach (draft VUMP page 42). Table G-6 suggests USFWS' concurrence but does not reference the 2022 letter, **raising serious concern as to whether formal concurrence was obtained for the current proposal.**

**OHM strongly recommends** that NPS, in coordination with GA DNR's Wildlife Resources Division and Coastal Resources Division:

- Implement seasonal or permanent closures of South End Beach (south of the jetty);
- Develop and fund a robust boater education program explaining closures; and
- Actively enforce restrictions to prevent unauthorized boat access to South End Beach.

**1.c) Prohibit dogs and pets on South End Beach and Nightingale Beach.**

In more than seven sections, the draft VUMP describes the harm that pets, especially dogs, can cause nesting and foraging shorebirds, yet it fails to identify management actions to address this threat. Dogs can directly harm chicks and cause adults to abandon nests, resulting in eggs and chicks' mortality.

Prohibiting dogs from sensitive beach habitats is a necessary and preventative measure. Documented impacts to Georgia shorebirds (like those documented in July 2025 by Manomet and GA DNR<sup>2</sup>) underscore the urgency of this action.

**OHM recommends:**

- A year-round prohibition on dogs on South End Beach;
- Seasonal prohibition of dogs on Nightingale Beach during critical nesting/foraging periods; and
- A leash requirement for all dogs elsewhere on the island, for wildlife and public safety.

**2) The VUMP fails to limit use of e-bikes in wilderness areas.**

By definition e-bikes are motorized vehicles. According to the Wilderness Act of 1964, motorized vehicles are prohibited from congressionally designated wilderness areas. On page 86, the VUMP touts an additional benefit of increased e-bike activity being, "visitors may be able to access more areas of the island than on a traditional bicycle or on foot." Because of the proposed increased e-bike availability and activity, we are concerned about the impact e-bikes will have on the wilderness areas and wilderness experiences for those seeking "the opportunity to experience solitude, remoteness, risk, challenge and self-sufficiency." (draft VUMP page B-23) We are also concerned about the potential for e-cyclists to ride on wilderness trails or to trespass on private property and cause environmental damage. Finally, we are concerned about the battery life of the bikes and the potential for them to be abandoned in the wilderness.

If e-bikes are to be allowed in wilderness areas, an Environmental Impact Statement (EIS) should be conducted to assess the impact this new mode of allowed transportation will have on the National Seashore.

**3) The VUMP increases motorized vessel access to the island.**

OHM supports non-motorized access such as kayaking and canoeing. However, increasing boat access to campsites and creeks will increase motorized vessel traffic and

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<sup>2</sup> <https://www.savannahnow.com/picture-gallery/news/environment/2025/07/20/ogeechee-bar-shorebirds/85281798007/>

associated risks to manatees in the intercoastal waterway, particularly near docks along the island's western shoreline.

**OHM recommends** that the NPS limit access to the wilderness campsites at Brickhill Bluff and Toonahowie to foot traffic and nonmotorized watercraft only. Small motorized watercraft access could threaten the manatees and allow campers to introduce equipment to the wilderness area that may cause undo harm.

4) **The VUMP lacks enforcement of visitor use rules.**

The draft VUMP does not adequately address how visitor use rules will be enforced. Effective management requires visible, consistent enforcement.

**OHM recommends:**

- Ban e-bikes from all wilderness areas, including roads.
- Increased law enforcement and ranger presence in wilderness areas and along the South End Beach during peak use;
- Dedicated funding for enforcement staff at key locations;
- Enhanced signage and monitoring at Nightingale Beach, Sea Camp, and adjacent areas critical to sea turtle nesting; and
- On-site staffing at Plum Orchard to ensure compliance by day visitors and backpackers.

With only four of Georgia's 14 major barrier islands accessible by car, Cumberland Island National Seashore offers essential opportunities for public education and wilderness experience. However, visitor access must never come at the expense of the preservation mandate that defines the National Seashore.

We appreciate the opportunity to comment on the draft VUMP and look forward to working with NPS to ensure Cumberland Island National Seashore remains a protected, wild, and ecologically functional landscape for generations to come. Contact me at any time if I can be of assistance.

Sincerely,



Megan Desrosiers  
President and CEO  
One Hundred Miles

ATTACHMENT A



United States Department of the Interior

**Fish and Wildlife Service**  
RG Stephens, Jr. Federal Building  
355 East Hancock Avenue, Room 320  
Athens, Georgia 30601

West Georgia Sub Office  
P.O. Box 52560  
Ft. Benning, Georgia 31995-2560

Coastal Sub Office  
4980 Wildlife Drive  
Townsend, Georgia 31331

December 30, 2022

Mr. Gary Ingram  
Superintendent  
Cumberland Island National Seashore  
101 Wheeler Street  
St. Marys, Georgia 31558  
Attention: Visitor Use Management Plan comments

Re: USFWS File Number 2023-0027826

Dear Mr. Ingram:

The U. S. Fish and Wildlife Service (Service) reviewed your request for comments on the National Park Service (NPS) Cumberland Island National Seashore (CINS) visitor use management plan and environmental assessment (VUMP). As stated in the invitation for comments, the plan purpose is to determine appropriate opportunities for visitors to use, experience, and enjoy the park while protecting the area's sensitive wildlife, ecosystems, historic buildings, cultural landscapes, and other resources. The objective of the plan is to provide park visitors, including those who have been historically disadvantaged and unable to visit, with opportunities to be inspired through personal connections with the natural wonders, special places, and important stories the park protects. Our comments are submitted in accordance with provisions of the Endangered Species Act (ESA) of 1973, as amended; (16 U.S.C. 1531 *et seq.*) and the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703 *et seq.*).

The VUMP is an all-encompassing document for visitor use of the entire CINS balancing visitor use with protecting the natural and historic environments of the island. The 1984 General Management Plan included visitor capacity at approximately 300 visitors per day. The VUMP has ferry delivery of approximately 600 people per day to the Dungeness and Sea Camp Docks and another 100 people to the Plum Orchard Dock at maximum capacity. This more than doubles the number of visitors. The Service expects that increasing the number of visitors per day will increase the amount of human disturbance on the island. This includes disturbance to all ESA listed species and to birds covered under the MBTA. With the conditions, protective measures, and best management practices proposed we do not expect any of this disturbance to rise to the level of 'take' of ESA listed or candidate species. Therefore we concur with the NPS ESA determinations of May Affect, Not Likely to Adversely Affect (MA NLAA) for the; West Indian manatee (*Trichechus manatus*), piping plover (Atlantic Coast, Northern Great Plains, and Great Lakes Watershed populations [*Charadrius melodus*]) and piping plover critical habitat (CH), red knot (*Calidris rufa*), wood stork (*Mycteria Americana*), gopher frog (*Lithobates capito*) (under review for listing), green sea turtle (*Chelonia mydas*), Hawksbill sea turtle

(*Eretmochelys imbricata*), Kemp's ridley sea turtle (*Lepidochelys kempii*), leatherback sea turtle (*Dermochelys coriacea*), loggerhead sea turtle (*Caretta caretta*) and loggerhead sea turtle CH. Sea turtles are under the jurisdiction of the Service when on land and under the National Marine Fisheries Service (NMFS) when in the water. Sturgeon species are mentioned in the VUMP. Sturgeon are under the jurisdiction of the NMFS at all times. The gopher tortoise (*Gopherus polyphemus*) is mentioned in the VUMP. The Service made an ESA finding of listing not warranted for the gopher tortoise.

All bird species covered under the MBTA that occur on the island will likely face similar increased human disturbance from the actions proposed in the VUMP. We agree with the NPS environmental assessment portion of the VUMP that the level of disturbance should not be out of compliance with the MBTA.

While the Service concurs with the NPS ESA determinations of MA NLAA for the activities of the VUMP, the effects to species will not be beneficial. The Service opines that the effects of the increased human disturbance will likely be adverse impacts to species not rising to the level of take. Impacts to bird species covered under the MBTA will likely be similar.

The Service does recommend enhancing or reconsidering the VUMP actions for the South End Beach to ensure minimization of impacts to ESA listed shorebirds and other shore birds covered under the MBTA.

The CINS Foundation Document describes one of the Fundamental Resources and Values (FRV) of the park as a rich environment of diverse habitats with natural character and a variety of plant and animal species. The document also lists a threat to the FRV of pristine beach as intense visitation and overcrowding from boaters landing on south end. The foundation document describes that a high priority planning need is south end management; "Uncontrolled visitation to the island's southern tip via private boats impacts critical bird habitat as well as other resources, both natural and cultural. It may also produce intense visitation and overcrowding that is not compatible with an undeveloped, primitive character."

The VUMP states that one of the management objectives for CINS is a 'back to nature' experience exemplary of a 'wild America' that does not duplicate the visitor experiences on other area beaches. High visitor density would be inconsistent with this management objective (page 104).

The VUMP includes information from a 2019 study of current visitor conditions on the island (Brownlee et al, 2019). The study information mentioned in the VUMP includes visitor usage of the South End Beach in 2019. The median observed level of visitor use on all holidays and weekend days was 42 visitors and the average of all these days was 72 visitors. The busiest days were the Memorial Day and Independence Day holidays at 225 and 418 people observed.

The Service is aware that the southern tip of the island is recognized by private recreational boaters in the area as an uncontrolled access 'beach' destination. This uncontrolled access includes family dogs, which are very disruptive to shorebirds. One trip through a shorebird nesting area by an unleashed dog can destroy nests, eggs, and young fledglings. Recreating

human visitors can have similar effects. Unless controls are placed on recreational boater visitation to the South End Beach, visitation will only swell as the boating public of the area grows. Growth of private boating in the area is being encouraged and facilitated by marina expansions and new development around the town of St. Marys.

The CINS south end is the closest 'beach' destination for boaters from the Kingsland / St. Marys area and the only available beach destination for many miles. From the closest marinas and public boat ramps on the mainland, CINS South End Beach is approximately 7 miles. On the other side of the St. Marys River and sound ship channel between the barrier islands is Fort Clinch State Park in Florida. The Fort does not allow boaters to access the beach in the state park. To reach the next closest beach that allows boaters access requires traveling at least another 20 miles south to Amelia Island State Park. The next closest beach after that is the north end of CINS, 28 miles from the St. Marys public boat ramps. Access to the boat landing area on the north end of CINS can be dangerous and difficult due to waves and a shifting channel. Additionally, the area is not accessible on the lower portions of tidal cycles. These distances make the CINS South End Beach a popular destination for area recreational boaters.

The VUMP proposes limiting South End Beach visitor and boating access to an 'open' portion of the South End Beach defined as a natural environment zone on the eastern portion of the beach. This would be approximately two-thirds of the beach. The purpose of which is allow active recreational opportunities to dominate and provide low-density experiences. As stated in the VUMP, natural resources in the natural environment zone should remain largely unaltered by human activity and visitor impacts kept to a minimum. Another portion of the South End Beach area, the 'closed' portion, would be designated as an environmental protection zone. It will be the western one-third of the beach. It is described as having areas of little human intrusion and other areas where humans would be excluded for the purpose of protecting shorebird habitat. The entire South End Beach area would be a dog-free area. No dogs on or off-leash would be allowed.

The primary goal of the VUMP is to preserve the fundamental resources and values of Cumberland Island. The amount, timing, distribution, and types of visitor use on CINS influences both conditions of fundamental resources and visitor experience. The VUMP sets the South End Beach visitor capacity at 60 People-At-One-Time in open portion, and zero people in closed area to west.

The Service has recommendations concerning the South End Beach portions of the VUMP.

It is unclear as to how much of the environmental protection zone (aka 'closed portion' or sensitive shorebird area) of the South End Beach would actually be closed to humans permanently, what portion closed seasonally, and what portion may have some limited access for wildlife / shorebird viewing. The Service is aware that there are large numbers of people on the South End Beach at times. The Service opines that permanent closures / no human access can be made by simple signage and are simple to understand. Seasonal closures and limited access tend to be invitations for large numbers of people to access areas without reading signs because they saw someone else enter the area at some time in the past. The danger for shorebirds is that a shorebird nest, egg, and or chick can be permanently destroyed by one trespass into a sensitive

shorebird area. Educating the offender may help alleviate future trespasses but the damage done by just one trespass may be permanent to a nesting attempt. The Service recommends that the environmental protection zone portion of the South End Beach be an area permanently closed to humans.

The Service provides the following as additional information supporting year-round area closure of shorebirds protection areas. In Georgia, shorebirds (including ESA listed shorebirds) prefer wintering habitat at the ends of barrier islands where the wave energy is lower than the face of the islands (per. com. - T. Keyes Georgia Department of Natural Resources [GADNR]). The south end of CINS is used by the piping plover and red knot, and is listed piping plover CH. The term 'wintering habitat' is a misnomer, as the piping plovers may use it from July 15 through May 15, or ten months of the year and be gone only two months out of the year. During these two months other shorebirds protected by the MBTA commonly nest on the beaches at the island ends. The south end of CINS has the greatest number of least tern, Wilson plover, and American oyster catcher nesting in Georgia (per. com. – T. Keyes GADNR). When shorebirds perceive a threat and take flight, they use valuable energy resources. Numerous studies have indicated that a bird's fitness is reduced by this use of energy, especially when it occurs often.

The Service lauds the NPS for proposing the South End Beach area to be a 'no dogs allowed' area. Dogs can impact shorebirds and their nesting similar to impacts by humans. In addition, dogs cannot read signs restricting access and some are attracted to small creatures (shorebirds) moving about on the sand. Leash rules are not always followed, and as mentioned earlier, any shorebird disturbance can be impactful.

The VUMP includes an indicator of effectiveness of the environmental protection zone on the western portion of the South End Beach. This would be monitoring for people entering posted closures (temporary or permanent) of sensitive shorebird areas. Adaptive management strategies to reduce disturbance would be implemented if more than two consecutive monitoring reports of visitor-related disturbance in a posted closure occur during the monitoring period/season. The Service opines that this is a good concept, but may not be protective of shorebirds depending on how it is implemented on the ground. When monitoring events would occur is not specified. Frequency, day of the week, time of day, observing for indications of recent disturbance, and other variables can change the amount of detection of disturbance. The Service recommends that monitoring be done with frequent regularity during high visitation periods. For example, monitoring near noon every Saturday and Sunday. If every other monitoring event occurs during a low visitation time, then consecutive reports of violations are less likely to occur. Similarly, looking for evidence of recent disturbance such as footprints in a closed area and considering that to be a reportable violation will give a more accurate report of disturbance to shorebirds rather than only reporting on humans seen during a monitoring event. Additionally, the Service opines that three consecutive reports of violation is a high trigger before adaptive management strategies are implemented. Many infractions could occur before this trigger is met. The Service recommends two consecutive reports of violation as the trigger. We see this as protective while not being likely to have allowed many infractions to occur before adaptive management is begun.

The VUMP document states on page 91 under ‘Potential Management Strategies’ for the South End Beach: “If necessary, consider a full closure of the South End Beach area to protect sensitive shorebirds if posted closure areas are not effective.” The Service lauds the NPS for considering such a strategy and agrees that it may be necessary and appropriate to protect shorebirds protected by the ESA and/or the MBTA.

While the VUMP sets the South End Beach visitor capacity at 60 People-At-One-Time in open portion of the area, it also states that the capacity may need to be reconsidered (page 111). The Service opines that to go to any higher visitor capacity number on the South End Beach would not align with the goals and desired conditions for CINS. Some of these are for visitors to experience uncrowded settings unlike other local beaches and protection of natural resources. This has been expressed in CINS surveys and public comment periods. We agree with the statement in the VUMP that visitor use levels in the range of 200 to 400 people on the South End Beach at one time is not appropriate (page 114). Additionally with the implementation of the VUMP, the size of the area that visitors would have access to would be decreased due to the establishment of the closed sensitive shorebird area.

We appreciate the opportunity to comment the VUMP. If you have any further questions, please contact our Coastal Georgia Sub Office staff biologist, Bill Wikoff, at [bill\\_wikoff@fws.gov](mailto:bill_wikoff@fws.gov) .

Sincerely,

**JOHN**  
**DORESKY**

Digitally signed by  
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(for) Peter D. Maholland  
Project Leader

cc: Tim Keyes, GADNR Shorebird Biologist, Brunswick, Georgia

#### References

Brownlee, Sharp, Blacketer, Nettles, and Perry. 2019 Evaluation of the Relationship Between Current Conditions, Travel Patterns, Visitor Thresholds, and Ferry Services at Cumberland Island National Seashore.