

December 22, 2022

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

RE: Comments on proposed Cumberland Island National Seashore Visitor Use Management Plan and Environmental Assessment

Dear Gary,

Thank you for the opportunity to submit comments on the proposed Cumberland Island National Seashore Visitor Use Management Plan (VUM plan) posted for review on October 31, 2022. These comments are submitted on behalf of One Hundred Miles, our Board of Directors, and our 1,200 members. One Hundred Miles (OHM) is a non-profit organization based in Brunswick, Georgia, with the mission to preserve and protect Georgia's 100-mile coast through education, advocacy, and community engagement.

We appreciate the 30-day extension to the original comment period. As we stated in the November 11, 2022, request for more time, this is a very important plan and every person who loves Cumberland Island and our national parks should be afforded a complete and effective opportunity to review and comment.

Background.

In general, OHM supports more public access to the significant natural areas of Georgia's 100-mile coast. The generational conservation effort to protect Georgia's barrier islands has been largely successful, but the lack of opportunities to visit our barrier islands often results in the general public not understanding the value of our coast. Given that only four of our 14 barrier islands are accessible by car, and one of those is gated, the Cumberland Island National Seashore provides valuable opportunities for people to visit and learn about our coastal ecosystems and wildlife.

We also support the plan's strategy for better distributing visitors across the island and throughout the day to minimize the impact of those visitors in any one location. We understand that while the daily limit will be increased to 700 visitors, there will be only a few times a year when visitation will peak and even fewer times when all 700 visitors will be in the park at the same time.

However, as the plan states, the additional visitors could pose a threat to the quality of the resources at Cumberland Island National Seashore—specifically the wildlife populations and the habitats that support them. As written, we are concerned that the VUM plan lacks enough specificity regarding enforcement, adaptive management, and monitoring strategies that will be implemented to preserve the diverse habitats of the sensitive and endangered species found on the island.

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). Considering this mandate, the updated VUM plan for Cumberland Island must offer assurances that increasing the number of visitors (island-wide or within key locations) will be compatible with the preservation of the unique assets of the national seashore, and it must adequately describe the necessary measures to secure these assets.

As previously mentioned, the benefits of having visitors experience a coastal barrier island that is designated wilderness are innumerable. Therefore, the need to balance the visitor experience with the preservation of the resource is imperative. Since we generally support the idea of increasing visitation to the island, as proposed, our comments will focus on identifying the appropriate indicators and thresholds and implementing adequate mitigation measures.

Indicators and Thresholds.

If the NPS believes that 700 people per day visiting the Cumberland Island National Seashore is appropriate, then reliable indicators and thresholds must be carefully and scientifically chosen. The listed indicators are (VUM plan, page 24):

1. Number of people entering posted closures of sensitive shorebird areas.
2. Number of people per viewshed at Nightingale Beach.
3. Number of people encountered on trails per day in designated wilderness.

Indicator 1: Number of people entering posted closures of sensitive shorebird areas.

We disagree that the “number of people” should be the indicator. Shorebird populations will be the most threatened of all wildlife populations on the island. In particular, the nesting shorebirds on the south end of Cumberland are especially vulnerable to the actions of visitors arriving on the island by private vessel to spend a day at the beach. Unlike visitors who arrive by ferry service and have an opportunity to be educated via written materials and direct communication from NPS staff, these boaters may be completely unaware of the sensitive shorebird habitat they encounter.

Understanding this challenge, we recommend using long-term nesting data trends as a baseline. We also recommend continued participation in data collection and analysis so that the true impact to the shorebirds can be assessed. Instead of defining the indicator as “number of people”, we urge you to work with scientists to determine the appropriate scientific metric that will ensure long term shorebird population success.

Indicators 2 and 3: Number of people per viewshed at Nightingale Beach. And number of people encountered on trails per day in designated wilderness.

We are concerned that these indicators lack any kind of scientific justification or correlation to habitat quality. We understand that visitor experience is one of the NPS’s primary concerns, but we feel it is inappropriate to establish indicators to help determine the human impact on a natural resource that are based only on human experience. Rather, the NPS should establish scientific indicators that help determine the true impact humans are having on quality of the wilderness (wildlife and habitat) that defines the Cumberland Island National Seashore. These could include wetland impacts, the health of key species, water quality, erosion rates, etc.

Possible Additional Indicators.

The three proposed indicators relate to the impacts humans have on the beach and trails. While we support the idea of increased ferry traffic with more frequent ferry trips to more locations on the island, we recognize that this change could also negatively impact the island’s resources—both terrestrial and marine. We are especially concerned that an increase in water vessel activity on South

Beach, in Cumberland Sound and in the intercoastal waterway could negatively impact federally and state-protected species, especially shorebirds, sea turtles, and manatees. As such, we recommend working with scientists to establish the appropriate metrics to ensure the frequency and location of expanded ferry and private vessel operations do not cause unintended consequences.

Mitigation Measures.

Increased visitation to Cumberland Island could provide an invaluable opportunity for visitors from all over the world to better understand the significance of Georgia’s predominately undeveloped coast. But the increased visitation will pose threats to the island. These threats, if not properly mitigated, could result in the degradation of the island’s wilderness. While we do not believe 700 people per day will have this effect, it will be the NPS’s responsibility to ensure it does not. As such, these mitigation measures will be essential to ensuring the preservation of Cumberland’s wilderness and wildlife resources for generations to come. We offer the following recommendations/amendments to your proposed mitigation measures.

1. **Full Closure to South End Beach.** We were sorry to see that you eliminated from consideration the concept of full closure of South End Beach (VUM plan, page 38). Over the next decade Camden County and St. Marys are expected to grow significantly. Plans for [Cumberland Inlet](#) and the future development of land around I-95, alone will bring more residents, more marinas, and more Georgia-based boat traffic. We also anticipate an increase in boat traffic from Florida. The beaches and marshes south of Cumberland Sound in Florida are designated Nassau River-St. Johns River Marshes and Fort Clinch [Aquatic Preserve](#), so no boat access is allowed to the beaches south of the state line. Considering these facts, it is safe to anticipate a significant increase in boater activity and beach-users along the South Beach of Cumberland Island.

Given the projected increase in boat traffic, as it is indicated in Figure B-7 (VUM plan, page 113), we are concerned that the proposed closure area will be insufficient for the protection of nesting

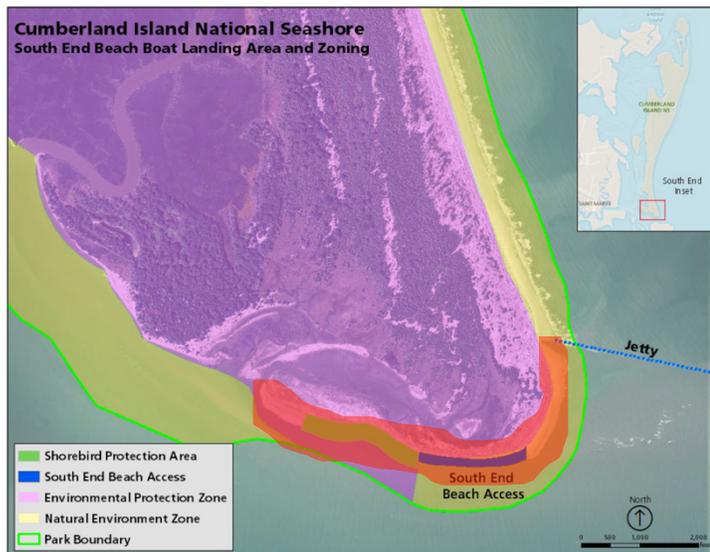


Figure B-7. Map showing the South End Boat landing area in relationship to management zoning

shorebird species south of the jetty. Because studies have shown that fencing and signage are inadequate tools for protecting shorebird nests from human impacts when humans and shorebirds share a beach in close proximity, we recommend that the NPS reconsider closing the entire south beach below the jetty to create a true “protected area”. (Our recommended closure area is highlighted in red in the adjacent

illustration.) We understand that safe landings for motorized boat visitors are a concern, however there are a variety of alternative opportunities to visit Cumberland Island, and we believe that private boat docking on South End Beach poses a threat to the sensitive shorebird populations

there. In addition to communicating about the closure to visitors arriving on the ferry, at the dock, and via signage on the beach for boaters, enforcement officials would need to regularly monitor South Beach to ensure compliance with the closure.

2. **Limit Motorized Vessel Access to the Island.** This includes small ferry service options. Kayaks and canoes are a great way to explore the island, and we support efforts to offer more water-based opportunities for visitors. However, increasing the number of access points along the marsh front and beachfront will increase motorized vessel traffic. This could have a detrimental impact on the manatees that are known to occur in high numbers in the intercoastal waterway of Cumberland, especially around boat docks on the western shoreline of the island.
3. **Strategic Ongoing Evaluation of the Impact of Ferry Traffic Island Resources.** The VUM plan references expanded ferry service throughout every section of the proposed plan, referencing more detail in the appendices: *“For a complete discussion of how ferry delivery will be managed within identified visitor capacities in this plan, see appendix C.”* (VUM plan, page 98). But upon review of Appendix C: Daily Ferry Delivery Technical Report (VUM plan, pages 129 to 136), we find no details regarding the expanded ferry service and no mention of how the ferry service expansion could impact the wilderness areas or protected species. The details offered in Appendix C only describe the Park Service commitment to the upholding obligations of the ferry concession contract and adapting management strategies based solely on the visitor experience of the island. We urge the NPS to work with scientists to identify mitigation strategies that reduce ferry impact on manatees, sea turtles, and the island’s shoreline.
4. **Improved Enforcement of Island Management Rules.** The VUM plan fails to commit to enforcement strategies that will be employed to ensure visitors comply with management rules designed to protect species. We recommend the Park Service partner with the United States Fish & Wildlife Service and the Georgia Department of Natural Resources to increase enforcement presence to ensure compliance with new and existing visitor use rules.
 - a. Specifically, the Park Service should incorporate law enforcement or ranger duties to enforce management strategies and rules in the wilderness areas where use of bicycles may increase and along the South Beach where boater activity is known to be heavy, especially on holidays and summer months.
 - b. We also recommend designated and funding law enforcement staff at key locations to ensure visitor and boater compliance with rules and regulations.
 - c. We are concerned about the potential impact of increased visitors at Nightingale Beach, Sea Camp and the area in between Sea Camp and South Beach. These regions of the island are critical habitat for nesting sea turtles and increasing human activity will harm the quality of the area for the sea turtle nesting. We recommend increased signage and law enforcement monitoring of behavior in these locations.
 - d. We also recommend planning for and funding law enforcement and/or rangers at Plum Orchard to ensure day visitors stay within the established grounds and that backpackers fully understand wilderness expectations.
5. **Analyze the Environmental Impact of E-Bikes on Cumberland Island.** We are concerned about the impact E-bikes will have on the wilderness areas and the beaches. If E-bikes are to be allowed in wilderness areas, an environmental impact statement should be conducted to assess the impact this new mode of allowed transportation will have on the National Seashore.

6. **Employ and Maintain Effective Wastewater Management Strategies.** Several new facilities/pavilions are proposed to enhance visitor experience. We recommend that each new facility include state of the art wastewater treatment facilities (mounded septic systems or composting toilets, for example). Targeted efforts must be planned so increasing the number of visitors to key locations does not negatively affect the water quality of the area. This is particularly important in the areas where the Park Service will be adding new facilities, such as Beach Creek Campsite and the upgrades to the facilities at Plum Orchard.

Thank you again for the opportunity to comment on this important plan. Contact me at any time should you need more information or have questions regarding these comments and recommendations. I can be reached by cell phone at (912) 223-8608 and by email at Megan@OneHundredMiles.org.

I hope you and your family enjoy a merry Christmas and a happy New Year.

Sincerely,



Megan Desrosiers
President and CEO
One Hundred Miles