



## WILDERNESS WATCH

*Keeping Wilderness Wild*

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May 10, 2019

Cumberland Island National Seashore  
Attn: Visitor Use Management Plan  
101 Wheeler Street  
St. Marys, GA 31558

Sent via the internet to: <https://parkplanning.nps.gov/cuis> and via US Mail

Dear Planning Team,

Enclosed are comments from Wilderness Watch on the Spring 2019 Visitor Use Management Plan scoping letter public outreach. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper administration of the National Wilderness Preservation System. We have attached a letter of October 23, 2015 sent to the Superintendent that addresses issues related to this plan as well (hard copy only).

The scoping letter states the purpose of the National Seashore:

*Cumberland Island National seashore maintains the primitive, undeveloped character of one of the largest and most ecologically diverse barrier islands on the Atlantic coast, while preserving scenic, scientific, and historical values and providing outstanding opportunities for outdoor recreation and solitude.*

However, the proposal in the scoping letter is in sharp contrast to the legislative purpose of the Seashore. The proposal seems to cheapen the Seashore and Wilderness through proposals to increase commercial use and expand visitor numbers and activities. Perhaps the best demonstration of this is the enumeration of the key issues. The plan seeks the “maximum” amount of visitor use while emphasizing more facilities and opportunities for commercial use. Even more telling is how the NPS apparently views protecting the *primitive and undeveloped character* of the island as an impediment to visitor use (i.e. “Determine how these mandates (enabling legislation and Wilderness) will impact decision making on visitor use”), rather than the overarching goal for management that will provide the type of experience visitors to the island deserve and have every right to expect.

In keeping with the direction of the statute establishing the national seashore and the CI Wilderness, all decisions affecting the lands north of the south boundary of the Wilderness should be designed to allow the island to return to a more wild and primitive condition. South of the wilderness boundary development should be limited to only which is necessary to administer the Island and protect the natural and cultural values from harm. To that end, we have the following suggestions:

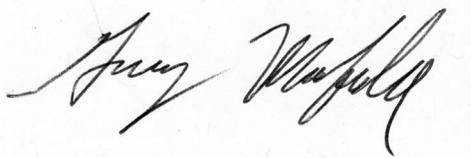
- 1- Keep the 300 person limit per day access to the Seashore.
- 2- With the exceptions of retained rights (and any statutory motorized access via the NPS or concessionaires), ban vehicle (motorized and mechanized) access to the beach. While the State of Georgia controls the beach itself below the high tide line, the Park Service controls road access to the beach. This will enhance the solitude of the Wilderness and other portion of the Seashore.
- 3- With the exceptions of retained rights (and any statutory access via the NPS or concessionaires), ban vehicle (motorized and mechanized) access through the Wilderness.
- 4- Bicycle use should be banned north of the southern boundary of the Wilderness. This kind of mechanized transport is not in keeping with the primitive nature of the Wilderness or land immediately adjacent to the designated Wilderness. The advanced technology used in modern bikes almost assures the island's primitive roads and trails would be swarming with bikes. And with the advent of motorized e-bikes any opportunity to experience Wilderness on Cumberland will vanish. While bike rather than automobile access to Plum Orchard might make sense, it would likely be impossible to control bike use in the nearby Wilderness. Our earlier letter details this concern.
- 5- Do not have paid guided tours between Sea Camp, Dungeness, and Plum Orchard and do not offer kayak rental at those locations. Commercialization needs to be kept to a minimum. The plan should consider ending the Lands and Legacies Tours, or, if not possible, recommend that the statue be changed to allow ending those tours. In the interim, if those Lands and Legacies Tours, (and any other commercial services in the Seashore at the south end) were conducted via horse-drawn carriages rather than motor vehicles, that would be more keeping with the character of the island.
- 6- In lieu of building new campgrounds in the Wilderness (Toonahowie and Whitney), consider allowing dispersed camping on a regulated basis in the Wilderness. This could be monitored and have restrictions put in place to prevent damage to wildlife, beaches, soils, vegetation, etc.. For example, restrictions on campfires, party size, camping on the beach or areas frequented by T&E species, etc. However, the number of people allowed to camp should not be increased.
- 7- Ferry access to Plum Orchard should only be considered if the statutes would allow the Park Service to close or regulate the road access to the area. In any case, visitor numbers at Plum Orchard should not increase if a ferry system is allowed.
- 8- Don't create new campsites accessible by canoe, kayak or small boats.

9- Forego development at Settlement and Long Point. Consider moving the church to the south end of the island where it can be more easily accessible and will obviate much of the motorized use through or adjacent to the Wilderness.

10- Remove the feral horses and allow fire to play its natural role in the Wilderness.  
Enjoying a wilderness experience depends on having an authentic Wilderness to visit. For the Cumberland Island Wilderness in particular, all aspects of management affect visitor experiences and should be geared toward providing opportunities to experience the real thing.

Please keep Wilderness Watch updated on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Macfarlane", written in a cursive style.

Gary Macfarlane  
President

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