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Comments submitted to:

<https://parkplanning.nps.gov/commentForm.cfm?documentID=137987>

October 16, 2024

Melissa Trenchik
Superintendent
Cumberland Island National Seashore
101 Wheeler St.
St. Mary's, Georgia 31558

Subject: Cumberland Island National Seashore Land Exchange

Dear Superintendent Trenchik:

I am writing on behalf of the Coalition to Protect America's National Parks (Coalition), which represents over 2,800 current, former, and retired employees and volunteers of the National Park Service (NPS). Collectively, our membership represents over 50,000 years of national park management and stewardship experience. Our members include former National Park Service directors, deputy directors, regional directors, and park superintendents, as well as a variety of program specialists and field staff. Recognized as the Voices of Experience, the Coalition educates, speaks, and acts for the preservation and protection of the National Park System, and mission-related programs of the National Park Service.

We write today to express our concern regarding the proposed land exchanges on Cumberland Island National Seashore (CUIS). Cumberland Island National Seashore is unique – and of critical importance – because of its wilderness character and values. Considering both designated and potential wilderness, the Cumberland Island Wilderness encompasses more than half of the island's land mass and is exceptionally large for a barrier island. Its deep, lush forest and untamed atmosphere offer outstanding opportunities for solitude and inspired recreation. Even

outside of the designated wilderness areas, the mandate to permanently protect the primitive state of the entire seashore protects these values. The current level of visitation helps to maintain these qualities and no action should be taken that would create the risk of diminishing Wilderness characteristics.

We have concerns that the proposed land exchange would do just that and **we urge the NPS to provide a complete analysis of alternatives and the direct, indirect and reasonably foreseeable impacts in an Environmental Impact Statement (EIS) so that the public can properly assess the impacts of the proposed land exchanges.**

The [public law](#) creating Cumberland Island National Seashore states that, “except for certain portions of the seashore deemed to be especially adaptable for recreational uses, particularly swimming, boating, fishing, hiking, horseback riding, and other recreational activities of similar nature, 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 not prevailing...”

This legislation creates two legal mandates for the management of land within the authorized boundary of Cumberland Island National Seashore:

1. With the exception of areas developed for certain recreational uses, **CUIS “shall be permanently preserved in its primitive state...”**
2. Even in those areas deemed “especially adaptable for recreational uses,” nothing can be developed **“which would be incompatible with the preservation of the flora and fauna or the physiographic conditions not prevailing...”**

In addition, the purpose of Cumberland Island National Seashore, according to the [CUIS Foundation Document](#), is to maintain “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.”

A park’s significance statements – found in in the Foundation Document - express why a park’s resources and values are important enough to merit designation as a unit of the National Park System. Statements of significance describe the distinctive nature of the park and why an area is important within a global, national, regional, and systemwide context. They focus on the most important resources and values that will assist in park planning and management.

The following significance statements from the park’s [Foundation Document](#) have been identified for Cumberland Island National Seashore. These statements are linked to the purpose of Cumberland Island National Seashore, and are supported by data, research, and consensus. (Please note that the sequence of the statements does not reflect the level of significance.)

1. Cumberland Island National Seashore is one of the Atlantic Coast's most ecologically diverse barrier islands, where local variations in environmental conditions create extensive and unique communities across the island; from the beach and dune system on the east, through the interdune, freshwater wetland, and upland forest habitats in the interior, to the salt marsh on the west.
2. Cumberland Island National Seashore contains a rich concentration of cultural resources that recount 4,000 years of human habitation and include a remarkable diversity of ethnic and social backgrounds. These pieces of the past—archeological features, landscapes, architecture, artifact collections, people—cast a compelling backdrop to the island that draws visitors into the stories of this remote place.
3. With almost 18 miles of pristine beach and one of the largest oak maritime forests remaining in the United States, Cumberland Island provides an unparalleled visitor experience.
4. Cumberland Island National Seashore protects the largest designated wilderness area on an East Coast barrier island.
5. Cumberland Island National Seashore's physical isolation provides visitors opportunities to experience outdoor recreation in an uncrowded, undeveloped setting. Moreover, this isolation helps to preserve and protect the island's fragile natural and cultural resources.

The condition of the Seashore is stable **because of the approximately 300 person per day capacity and the lack of bridge access**. In other words, the low level of daily visitation allows for a stable environment where unacceptable impacts and impairment are prevented. While there have been discussions over the years about allowing significantly more visitors, automobiles, and other modes of transportation, there has always been clear recognition that preventing unacceptable impacts and impairment consistent with the authorizing legislation is essential to the protection and preservation of CUIS.

As we have expressed in [previous comments](#), we are very concerned that the Visitor Use Management Plan for CUIS provides for increased use and development and we believe that the proposed land exchanges would open the door for even more development and recreational uses that would impact the visitor experience, as well as adversely impact park resources.

The proposed land exchanges seem to be based on the idea that consolidation of development would be an asset in administering the park. However, without restrictions consistent with the authorizing legislation, the essence of the Seashore as a wilderness and a place where a visitor can enjoy isolation and solitude could be lost. Allowing for the possibility of new private development within the Seashore would reverse half a century of investment by the federal government and by countless people who have worked together to protect this priceless resource.

The NPS has recognized that development of any kind on the remaining inholdings would be inconsistent with the enabling legislation and the general management plan of the Cumberland Island National Seashore. The Land Protection Plan says, “[I]n the long run, to provide full public use of the island, provide adequate protection for natural and cultural resources, and fulfill the purposes of the seashore as defined by the [authorizing legislation], full fee acquisition [of private inholdings] is desirable and necessary in most cases.” (*Land Protection Plan at 20*) In

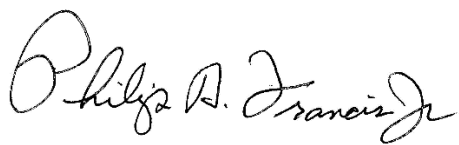
addition, the Land Protection Plan discusses its specific concerns about inholdings and explains why development would be incompatible on each inholding.

In recognition of the threat of development, the NPS has acquired approximately 800 acres of fee simple land within CUIS through eminent domain or declarations of takings since 1972 (*Land Protection Plan at 12*). Although the NPS has expressed a preference for acquisition from a willing seller, it has also conceded that eminent domain will be exercised “when acquisition is critical and the owner and the NPS could not negotiate another alternative.” (*Land Protection Plan at 12*]

Congress made reference to the [1916 Organic Act](#) of the National Park Service in the [legislation](#) that created CUIS as a unit of the National Park System, stating that CUIS should be managed in a manner consistent with that act. The [Redwood Act](#) also clearly states that, “Congress further reaffirms, declares, and directs that the promotion and regulation of various areas of the National Park System, as defined in section 2 of this Act, shall be consistent with and founded in the purpose established by the first section of the Act of August 25, 1916, to the common benefit of the people of the United States.” And CUIS’ [Wilderness Designation](#) further affirms and directs a very high level of protection for the park’s resources.

It is clear that the intent was to protect the Cumberland Island National Seashore from becoming like other developed areas found along the coast of our country. Today, we must reaffirm how important it is to preserve and protect these special and unique places. To ensure that CUIS is protected from development and excess uses that may cause harm to the park’s resources and ecosystems, we urge the NPS to provide a complete analysis and EIS so that the public can properly assess the impacts of the proposed land exchanges.

Sincerely,

A handwritten signature in cursive script that reads "Philip A. Francis Jr." The signature is written in black ink and is positioned below the word "Sincerely,".

Phil Francis
Chair
Coalition to Protect America’s National Parks