

**National Park Service
U.S. Department of the Interior**

**Cumberland Island National Seashore
Georgia**



**FINDING OF NO SIGNIFICANT IMPACT AND DECISION DOCUMENT
Visitor Use Management Plan
Cumberland Island National Seashore
PEPC 73577**

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Recommended:

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INTRODUCTION

The National Park Service (NPS) prepared an environmental assessment to evaluate the possible alternatives and potential environmental impacts that may occur with implementation of a visitor use management plan for Cumberland Island National Seashore. Cumberland Island National Seashore is referred to as “the park” in this document. The purpose of the visitor use management plan and environmental assessment (VUM Plan/EA or the plan) is to determine appropriate opportunities for visitors to use, experience, and enjoy Cumberland Island National Seashore and to develop strategies to concurrently protect resources. The plan was prepared to identify visitor capacity for the island, to identify effective strategies for managing visitor use, to reduce visitor impacts on sensitive natural resources, to provide guidance for ferry transportation to the island, and to consider visitor use changes in relationship to wilderness mandates^{1 2}.

The VUM Plan/EA analyzed two alternatives: alternative 1 or the no-action alternative, which provides a basis for comparing environmental impacts of alternative 2; and alternative 2, the National Park Service proposed action and preferred alternative.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the Visitor Use Management Plan and Environmental Assessment (2025) and associated decision file. The VUM Plan/EA was made available for public review January 6, 2026, through February 21, 2026. A prior version of the plan was available for public review October 28, 2022, through December 30, 2022. This FONSI reflects the decision based on the updated 2025 plan after the project was reinitiated.

The National Park Service made changes to the 2022 plan based on public and agency input received, including clarifications and corrections. Attachment A provides the public comment report, including NPS responses to comments received on the updated 2025 VUM Plan/EA. Attachment B provides a determination of non-impairment as required by NPS Management Policies 2006. Attachment C provides the errata, which provides revisions and corrections to the plan and environmental assessment. Attachment D provides Step 1 of the minimum requirements analysis, which documents the necessity for taking actions in wilderness. Prior to implementation of actions in wilderness, Step 2 of the minimum requirements analysis will be further developed and finalized to identify the techniques and types of equipment needed to ensure that impacts on wilderness resources and character are minimized. The FONSI, plan, and errata constitute the final decision for implementing this plan at the park. The statements and conclusions reached in this FONSI are based on documentation and analysis provided in

¹ Certification related to Page Limits: The National Park Service certifies it has considered the factors mandated by NEPA; that this FONSI represents its good-faith effort to prioritize documentation of the most important considerations required by the statute within the congressionally mandated page limits; that this prioritization reflects the National Park Service’s expert judgement; and that any considerations addressed briefly or left unaddressed were, in the National Park Service’s judgement, comparatively not of a substantive nature that meaningfully informed the consideration of environmental effects and the resulting decision on how to proceed.

² Certification related to Deadline: The National Park Service certifies that this FONSI represents a good-faith effort to fulfill NEPA’s requirements within the congressional timeline; that such effort is substantially complete; that, in the National Park Service’s expert opinion, it has thoroughly considered the factors mandated by NEPA; and that, in the National Park Service’s judgment, the analysis contained therein is adequate to inform and reasonably explain its decision regarding the proposed Federal action.

the VUM Plan/EA and associated decision file. To the extent necessary, relevant sections of the VUM Plan/EA are incorporated by reference below.

The environmental assessment and this finding of no significant impact have been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended.

SELECTED ALTERNATIVE

The alternative selected by the National Park Service for implementation is alternative 2 (proposed action and NPS preferred alternative), as described on pages 34-39 of the plan. Updates and clarifications to alternative 2 are included in Attachment C: Errata. Changes made to the selected alternative due to public and agency comments include the following:

- Updated language in Appendix G states that visitors on bikes and e-bikes would be subject to the same speed limits described in the Superintendent's Compendium at section 4.21.
- Updated language throughout the plan regarding impacts to special status species, per consultation with US Fish and Wildlife Service (USFWS).

The following summary of the selected alternative is inclusive of the changes described in the bullet points above.

Under the selected alternative, the National Park Service aims to balance visitor use opportunities and resource protection in the areas of Cumberland Island under NPS jurisdiction. Actions under this alternative include improved connections for visitors to the park's fundamental resources and values, increased and more predictable visitor access, and enhanced visitor recreational opportunities in designated wilderness, as well as the park's backcountry and frontcountry areas. The selected alternative incorporates visitor use management strategies including rotating campsites through administrative closures to allow for recovery and management within visitor capacities at key locations.

Two new wilderness campsites at Toonahowie and Sweetwater Lakes will be designated and added to the Recreation.gov reservation system alongside the existing designated wilderness sites at Brickhill Bluff and Hickory Hill. Fees for the new sites will mirror those charged for existing wilderness campsites. The existing Yankee Paradise site will be abandoned. These changes will allow the same maximum number of people to camp in designated wilderness at one time (72 campers) but spread out the maximum of 12 parties across four sites instead of three. Step 1 of a minimum requirements analysis for changes to campsites in wilderness has been included as attachment D. Prior to implementation of actions in wilderness, Step 2 of the minimum requirements analysis will be further developed and finalized to identify the techniques and types of equipment needed to ensure that impacts on wilderness resources and character are minimized.

Backcountry camping capacity will increase from the current maximum of 36 campers to a maximum of 54 campers at one time. Stafford Beach Campground will continue under current management. Three sites at Hunt Camp campground, currently used exclusively for managed hunts and NPS administrative needs, will be opened to public reservations. A maximum of 18

campers (three parties of six campers) will be able to make reservations for the Hunt Camp campsites.

For frontcountry camping, Sea Camp campground will convert the three current sites reserved for overflow situations into public sites available through Recreation.gov. While no new sites will be developed at the campground, the selected alternative will increase camper capacity from 112 campers to up to 130 campers at one time.

A campground will be constructed at Nightingale Beach, allowing three parties of up to six people to camp at one time. A bathhouse offering visitor restrooms and outdoor showers will be constructed near Nightingale Beach. Two shade pavilions will be created—one near the existing Dungeness Beach Boardwalk and one alongside the new Nightingale Trail beach access spur. The pavilions at Nightingale and Dungeness Beaches will be simple, floorless (no concrete pad), and have shade structures utilizing natural materials with minimal environmental consequences if they were washed out in a storm surge. Visitor facilities will be fully compliant with the Architectural Barrier Act Accessibility Standards (ABAAS), to the extent practicable.

The park may consider expanded ferry service to Sea Camp and Plum Orchard dock, on-island kayak and canoe rentals, additional flexibility in motorized tour schedules and itineraries, and the potential to sell health, safety, camping essentials, and bookstore-appropriate items alongside authorized on-island bicycle and cart rentals. The park would go through the appropriate NPS commercial services process (i.e., concession contracts, commercial use authorizations, leasing, and annual work planning) prior to making any changes.

Bicycle use on the beach will be extended between Dungeness and Stafford Beach Crossing. Bicycle use will remain prohibited on park trails, and users must dismount and walk their bikes across boardwalks, including the boardwalk from Sea Camp Campground to the beach. Bicycle use will be prohibited from 30 minutes after sunset to 30 minutes before sunrise during turtle nesting season (May 1 to October 31). The park will actively manage the number of personal bicycles transported via ferry and the number of bicycles available for on-island rentals. The total daily combined number of bicycles delivered and available for rental will not exceed 100. After the NEPA process is complete, and in accordance with 36 Code of Federal Regulations (CFR) 4.30, the Superintendent would prepare a written determination stating that the addition of bicycle use on the beach and administrative roads is consistent with protecting the park's natural, scenic, and aesthetic values, is consistent with management objectives, will not disturb wildlife or park resources, and has considered safety impacts. The written determination would be published in the Federal Register for a 30-day public comment period, after which, the Regional Director will evaluate whether to approve the written determination. Bicycle use between Dungeness and Stafford Beach would not occur until the written determination is finalized.

HOW THE VUM PLAN/EA AMENDS CUMBERLAND ISLAND NATIONAL SEASHORE'S 1984 GENERAL MANAGEMENT PLAN

The VUM Plan/EA amends the park's general management plan for the following topics:

- Zoning. Pages 13-21 of the VUM Plan/EA, including Table 2, “Changes to Zoning,” describes the amendments to the park’s 1984 general management plan and provides rationale for each change.
- Desired Conditions. The zoning described in the 1984 general management plan does not provide enough detail to inform the decisions of park managers regarding appropriate visitor uses and resource conditions. Therefore, the VUM Plan/EA provides greater detail to the zones through desired conditions. Desired conditions are statements of aspiration that describe visitor experiences and opportunities, resource conditions, and facilities and services that the National Park Service strives to achieve and maintain in a particular area. The desired conditions are found on pages 14-18 of the VUM Plan/EA.
- Visitor Capacities. The 1984 general management plan indicated a visitation ceiling of 300 people per day. The VUM Plan/EA amends this number through a visitor capacity analysis summarized on pages 26-28 and detailed in Appendix B. To support the capacities, the VUM Plan/EA identifies monitoring to be completed by the park to understand whether desired conditions are impacted by visitor use. The Indicators and Thresholds section on pages 25-26 and further elaborated in Appendix A describe these monitoring activities. The three monitoring activities identified for this purpose are:
 - number of people entering posted closures of sensitive shorebird areas
 - number of People Per Viewshed (PPV)
 - number of people encountered on trails per day in designated wilderness

Management of daily ferry delivery to the island is crucial to maintaining and protecting the desired experience and resource conditions of the park. It is also an important aspect to managing the amounts and types of use in the identified visitor capacities for key areas and ensuring thresholds are not exceeded. The framework park managers would use to identify how many passengers the ferry service can deliver to Cumberland Island per day is discussed in Appendix C of the VUM Plan/EA.

Based on the analysis in Appendix C of the VUM Plan/EA, the park may increase daily ferry delivery to the island from current levels without adversely impacting desired conditions, exceeding thresholds, or exceeding visitor capacities. The analysis in Appendix C estimates that the ferry may deliver approximately 600 people per day to the Dungeness and Sea Camp docks combined. In addition to the 600 people delivered to the Sea Camp and Dungeness area, the analysis estimates that another 100 people per day may be delivered directly to Plum Orchard if ferry service to that location is established. The number of people delivered to the island by ferry each day will be managed incrementally and adaptively. As the plan is implemented and additional visitors are delivered to the island each day, two key indicators (PPV at Nightingale Beach and encounter rates in wilderness) will be monitored. If conditions approach their respective thresholds for these indicators, park managers will adjust ferry delivery by working with the concessioner. Those adjustments may include changes to the daily delivery number, timing of delivery, and/or spatial distribution of delivery.

RATIONALE FOR THE DECISION

The National Park Service selected alternative 2 because:

- It is consistent with the park's enabling legislation and meets the purpose and needs for action by providing appropriate and improved opportunities for visitors to use, experience, and enjoy Cumberland Island National Seashore, while concurrently protecting its resources.
- It provides an update to the park's 1984 General Management Plan's desired conditions and zoning as well as its determination that "visitation to the island is to remain at approximately 300 people a day." Alternative 2 updates this determination with visitor capacities and a ferry delivery analysis that are consistent with current NPS policy and best practices, have a scientifically sound basis in the protection of park resources and visitor experiences, and reduce barriers for new and diverse groups visiting the island.
- It provides for improved monitoring of resources and experiential attributes on the island to track achievement of desired conditions.
- It will provide opportunities for visitors to enjoy the park, gain appreciation of park resources, and derive inspiration from the resources.
- It includes mitigation measures to minimize impacts on park resources and visitors. While some resources will experience adverse impacts over time and broad geographic areas, there is no potential for significant impacts to occur.

MITIGATION MEASURES

The National Park Service places a strong emphasis on avoiding, minimizing and mitigating potentially adverse environmental impacts. To avoid, minimize, or mitigate impacts, the National Park Service will use the following strategies stemming from the NPS Organic Act and NPS Management Policies or any specific authorities as listed below throughout implementation of the selected alternative.

The authority for mitigation for this project comes from laws and policies, including:

- NPS Organic Act (16 USC §1.)
- The Redwood Act (HR3813 (95th)
- 1978 National Parks and Recreation Act
- Endangered Species Act, as amended (16 USC § 1531 et seq.)
- National Historic Preservation Act of 1966, as amended (54 USC § 300101 et seq.)
- Director's Order #41: *Wilderness Stewardship* (NPS 2013)
- NPS *Management Policies 2006* (chapters 4, 5, and 6)

Natural Resources – Developed in Collaboration with US Fish and Wildlife Service

- Educate ferry operators and boaters about manatees, sea turtles, and sturgeon, and boaters' responsibility.

- Enforce regulations related to the protection of manatees and sea turtles.
- Manage visitor activity adjacent to the Plum Orchard Mansion pond to prevent disturbance of wood storks and other wading birds. Ideally, the number of visitors directly adjacent to the pond would be controlled. If necessary, install fencing designed to complement and blend with the historic cultural landscape. If fencing is not feasible, then a screen/barrier using natural vegetation should be developed to prevent access to the pond.
- Develop an educational program for concession staff and park interpretive staff that focuses on threatened and endangered species identification and proper actions when species are encountered. Provide refresher training for staff on a regular basis and ensure that new personnel receive training promptly.
- NPS staff would monitor the beach for nesting American oystercatcher pairs, least tern colonies, and other species of concern. Informational signs would be used to identify nesting areas and restrict access when and where necessary to protect the species of concern.
- Staff involved with the annual sea turtle nest monitoring and protection project would continue to maintain records of disturbances to nest sites. A database would be developed to evaluate trends in human disturbance potentially related to implementation of the preferred alternative. Mitigation in the form of increased visitor education efforts and nest protection measures would be necessary to maintain a reduced pedestrian presence and disturbance around nest sites.
- Consistent with current closure practices described in the Superintendent's Compendium (36 C.F.R. 1.5), seasonal trail or beach closures may continue to be implemented during certain times of the year. The park's resource managers would continue to make this determination based on the presence of species of concern, their proximity to key visitor access routes or locations, and the likelihood that increased levels of human disturbance may negatively impact breeding or nesting success.
- Any potential future night programming would take precautions to minimize the use of lighting and noise disturbances.
- Bicycle and e-bike use on the beach would be prohibited 30 minutes after sunset to 30 minutes before sunrise during sea turtle nesting season (May 1 to October 31).
- Visitors on bicycles and e-bikes would be subject to the same speed limits described in the Superintendent's Compendium at section 4.21, which range from 10 to 25 miles per hour.
- According to NPS Management Policies 2006, the National Park Service would strive to construct the proposed trail with a sustainable design to minimize potential environmental impacts. Development would not compete with, dominate park features, or interfere with natural processes, such as the seasonal migration of wildlife or hydrologic activity. To the extent possible, the design and management of the proposed trail and boardwalks would emphasize environmentally sensitive construction, use of nontoxic materials, resource conservation, recycling, and integration of visitors with natural and cultural settings.
- Care would be taken to not disturb any sensitive wildlife species found nesting, hibernating, estivating, or otherwise living in or immediately nearby work sites. Resource

management personnel would be notified/consulted when wildlife must be disturbed or handled.

- If sensitive resources are discovered during the construction of trails or campsites, construction would cease and the area would be surveyed in more detail so that impacts could be avoided, minimized, or an alternative route be established.
- Educate motorized tour operators of the potential for tortoises on the road and what to do if one is encountered.

Cultural Resources

- The park would conduct an archeological survey of any area that would be subject to ground disturbance and would avoid and minimize the effects of new development on archeological resources.
- The park would consider the effect of all new development on historic properties in consultation with the Georgia State Historic Preservation Office (SHPO) and other consulting parties in accordance with section 106 of the National Historic Preservation Act (36 CFR 800).
- Prior to the start of construction projects that involve ground disturbance, the National Park Service would consult with American Indian tribes traditionally associated with lands within the Cumberland Island National Seashore.
- Should construction unearth previously undiscovered cultural resources, work would be stopped in the area of discovery, and the park would consult with the SHPO and the Advisory Council on Historic Preservation as necessary, according to 36 CFR 800.13. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony were discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC 3001) would be followed.

Wilderness Resources and Character

- Develop an educational program for concession staff and park interpretive staff that explains what congressionally designated wilderness is, provides an understanding of the type of experience sought by typical wilderness users, and describes methods for minimizing impacts on wilderness character. Provide refresher training for staff on a regular basis and ensure that new personnel receive training promptly.

Implementation of alternative 2 authorizes the National Park Service to implement the visitor use management strategies, visitor capacity framework, campsite and visitor facility improvements, and associated management actions analyzed in the environmental assessment. Certain site-specific actions may require additional environmental review, permitting, consultation, or compliance prior to implementation depending on final design, location, or site conditions. The selected alternative incorporates mitigation measures, monitoring requirements, adaptive management strategies, and agency stipulations identified throughout the environmental assessment and associated compliance documentation, including measures developed through consultation under the Endangered Species Act, the National Historic Preservation Act, and the Coastal Zone Management Act.

THE DEGREE OF EFFECTS OF THE ACTION

The National Park Service considered the following in evaluating the degree of effects (40 CFR 1501.3[b]) of the selected action.

As described in the VUM Plan/EA, the selected alternative has the potential for adverse and beneficial impacts on park resources, including vegetation, wetlands, special status species, wilderness character, visitor use and experience, and socioeconomics.

Vegetation

New and decommissioned campsites will have both adverse and beneficial impacts on vegetation. During construction, the Toonahowie and Sweetwater Lakes Wilderness campsites will each require the removal of less than 1,000 square feet of vegetation, with little impact on understory vegetation and no impact on mature trees in the short term. Because these sites already have little groundcover, long-term adverse effects will be minimal. In contrast, closing the Yankee Paradise Wilderness Campsite will end localized trampling on roughly 1,000 square feet, allowing natural vegetation recovery and producing a slight long-term benefit.

The Nightingale Campground and Bathhouse will require clearing about 3,000 square feet and 1,000 square feet respectively of understory vegetation in Live Oak habitat. These adverse impacts will be short-term, and mature trees will be avoided. Additional clearing for bathhouse utilities includes 2,670 linear feet for utility lines and 1,200 square feet for a septic leach field. Roughly 400 square feet will remain permanently cleared for the bathhouse footprint, but other disturbed areas will be reseeded with native vegetation. Tree removal for the leach field will be minimized.

The Nightingale and Dungeness pavilions (each ~800 square feet) will be placed in vegetation types with naturally sparse groundcover, avoiding mature vegetation removal.

New trails will also affect vegetation.

- The Nightingale Beach Access Trail will cross about 425 linear feet of freshwater forested/shrub wetlands. Elevated boardwalks on helical piers will result in short-term adverse impacts during construction, but will allow light and rainfall penetration, reducing long-term adverse impacts. The remainder of the trail crosses Live Oak–Cabbage Palmetto habitat and will avoid mature trees.

Overall, vegetation impacts would be limited in extent and primarily confined to understory vegetation within previously disturbed areas or areas with naturally sparse groundcover. Project design incorporates avoidance and minimization measures, including siting facilities to avoid mature trees, using elevated boardwalks in wetland areas, minimizing utility corridor clearing, and revegetating temporarily disturbed areas with native species. Because development footprints are small and designs emphasize avoidance and minimization, impacts are expected to be minimal.

Across all proposed facilities and trail, approximately 2,500 square feet of vegetation will be permanently removed and converted to developed use, while approximately 3,870 square feet of understory vegetation will be temporarily disturbed during construction. In total, about 6,400

square feet will be affected over the life of the plan, though construction will likely occur in phases. Most adverse effects will be short-term and localized, and disturbed areas not needed for long-term operations would be restored through revegetation. Beneficial effects would also occur through closure of the Yankee Paradise Wilderness Campsite, allowing recovery of approximately 1,000 square feet of previously trampled vegetation.

Given the limited acreage affected relative to the extensive vegetation communities present within the Seashore, the avoidance of mature trees and sensitive plant communities, the localized nature of the disturbance, and the implementation of restoration and mitigation measures, the proposed action will not substantially alter the composition, structure, function, or ecological integrity of vegetation resources. Accordingly, impacts to vegetation will be minor to moderate, localized, predominantly short term, and would not rise to the level of significance.

Wetlands

Most facilities and the new trail will be built on well-drained sandy soils. Construction will only proceed after soil investigations and wetland delineations confirm suitable conditions. Wetlands will be avoided wherever possible; if avoidance is not feasible, elevated boardwalks on helical piers—set at least 24 inches above ground—will be used to maintain hydrologic flow and sunlight penetration.

The Nightingale Beach Access Trail will cross through up to approximately 425 linear feet of freshwater forested/shrub wetland. Placement of helical piers to support the boardwalk will require digging postholes and will permanently disturb up to 165 square feet (0.004 acre) of soil. The total surface of the boardwalk will not exceed approximately 0.03 acre.

To comply with Executive Order 11990, “Protection of Wetlands,” any facilities or construction will be designed to avoid adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. Impacts on wetlands are not anticipated to be greater than 0.1 acre and therefore excepted from statement of findings and compensation requirements (NPS 2016b). If impacts greater than 0.1 acre were unavoidable, additional compliance and a wetlands statement of findings will be necessary prior to trail development.

To comply with Executive Order 11988, “Floodplain Management,” any facilities or construction will be designed to reduce property losses and risk to human safety. In accordance with the Coastal Zone Management Act, impacts on estuarine and marine wetlands require consideration for a marsh permit under the Georgia Coastal Marshlands Protection Act. Upon further design and field delineation, if impacts on this wetland type are unavoidable, the park would contact the Georgia Department of Natural Resources, Coastal Resources Division, to ensure the design and installation were compliant with local permit requirements.

Collectively, the trail will cross through up to approximately 425 linear feet of freshwater forested/shrub wetlands. The installation of helical piers to support a boardwalk over these stretches will result in the permanent removal of approximately 165 square feet of wetland soils and wetland vegetation. While the impact of construction is adverse and long-term, overall functions of the wetlands will not be noticeably altered because of the small area of ground

disturbance in relation to the total acres of wetlands present in the project areas. The impacts are therefore not significant.

Special Status Species

Overall, expanded ferry service and motorized concession tours increase risks for vessel and/or vehicle collisions and disturbance to several special status species; however, this increase will be mitigated by additional education and educational signage around the docks and in areas where affected species are known to be present. Generally expanded ferry service to the island and additional access to various portions of beach along the eastern seashore may lead to an increased potential for the presence of people on beaches used by nesting and foraging shorebirds and sea turtles and will increase disturbance to these species beyond what is currently experienced. Mitigation efforts and implementing indicators and thresholds for management strategies will help minimize this risk and may reduce disturbance to shorebirds. The impacts are not significant, as described below.

Special Status Mammals

Construction of a new trail, utilities, a bathhouse, pavilions, and additional campsites will permanently remove about 0.3 acre of native and nonnative vegetation. This small-scale habitat loss will slightly reduce habitat quality for the tricolored bat, but it will not measurably affect the species because the park contains more than 36,000 acres of suitable habitat, including marshlands, live oak forests, pine stands, palmetto, swamps, and coastal scrub-shrub areas.

There are no in-water actions and there is no in-water construction required to accommodate the expanded ferry service and therefore no impacts on West Indian manatee habitat. The increased ferry service will overlap the season when manatees are most likely to be in the waters around Cumberland Island (April through October) and therefore, the risk of boat collisions and visitor interactions with manatees will slightly increase during these months resulting in a short-term adverse impact on individual manatees.

If kayak rentals are placed in proximity to areas where manatees are known to congregate, staff will identify and designate a zone on the beach where renters may safely enter and exit the water without disturbing the manatees. Kayak renters will be educated on safe distances to maintain from the animals to ensure their protection and minimize the potential for disturbance.

These increased risks for vessel collisions and disturbance will be mitigated by additional educational signage around the docks and installation of signage in areas, such as Beach Creek, where manatees are known to congregate. Vessel speed will be posted and further enforced around the ferry landing docks, and no-wake zones will be posted in areas, including Beach Creek and smaller unnamed creeks south of Beach Creek, minimizing impacts on manatees. Ferry service operators currently follow boater best management guidelines when operating the ferries and these same guidelines will be followed for expanded ferry services and routes. With the implementation of these mitigation measures, the risk to individual manatees will be minimized.

Special Status Birds

The increased potential for the presence of people on the beaches used by nesting and foraging shorebirds will increase disturbance to these species beyond what is currently experienced, a long-term adverse effect. The continued and expanded use of both bicycles and Class 1, 2, and 3 e-bikes on the beach between Sea Camp and Stafford Beach Crossings may initiate aversive behavior in shorebirds or cause them to exert energy needed for migration (as applicable) or searching for food in these areas. The increased presence and noise of the e-bikes may disturb foraging shorebirds. However, given the naturally high ambient noise levels caused by wave action along the beaches on the island, the noise generated by e-bikes is not anticipated to result in impacts on special status bird species. In addition, many shorebirds are more frequently found in low wave energy locations on the northern or southern tips of the island, areas where bicycles and e-bikes are not allowed on the beach.

Staff will monitor visitors entering posted closures (temporary or permanent) of sensitive shorebird areas and will implement adaptive management strategies to reduce disturbance if more than two consecutive monitoring reports of visitors entering a posted closure or visitor-related disturbance in a posted closure occur during the monitoring period/season.

Across the island, impacts on special status shorebirds and marsh birds will be minimized by additional enforcement and additional educational signage.

No actions will occur in the freshwater marsh, swamps, lagoons, ponds, and brackish wetland habitat of the island used as foraging grounds for the wood stork and Eastern black rail.

Special Status Insects

There is the potential for single removals of monarch butterflies' host plant, milkweed, as part of vegetation clearing for these proposed actions; however, the locations of the proposed structures in the dune fields and in shaded forest are not ideal conditions for most milkweed species that prefer open conditions with access to sun and sandy soils. Upon completion, the addition of two pavilions, a campground, and a bathhouse at Nightingale may reduce dune trampling by visitors in these areas, minimizing impacts to monarch habitat. The temporary disturbances caused by short-term construction may temporarily agitate individual monarchs but are not expected to displace the species from the island.

Special Status Reptiles

Most proposed actions will occur south of the island's known gopher tortoise range, so direct impacts on tortoise and Carolina gopher frog habitats are not expected. Wilderness campsite areas will be surveyed before any clearing to ensure tortoise burrows are avoided. Expanded ferry service, new camping opportunities, and increased visitor access may slightly increase disturbance in tortoise habitat, and additional motorized tour vehicles may marginally raise the risk of vehicle strikes, though operators will be instructed on how to avoid harming tortoises.

Several proposed actions will increase public access to beaches used by nesting sea turtles. While the northern five miles of the island remains the primary loggerhead nesting area, nesting is increasing on the southern end and near Stafford Beach. More visitors could create additional pedestrian and bicycle tracks, which may slow hatchlings, cause them to overturn, or trap them

in debris. Debris or compacted sand may also impede hatchling emergence. Most visitor activity occurs during daylight, so direct interactions with nesting females or emerging hatchlings are unlikely, but nighttime beach use with flashlights could deter nesting or disorient hatchlings, a long-term adverse effect.

Increased ferry service during the nesting season (March through September) will slightly elevate the risk of vessel strikes, as sea turtles also inhabit sounds, estuaries, and tidal creeks. Best-management practices for ferry operators and educational signage will help reduce this risk.

The park's ongoing sea turtle monitoring program will continue to track human-related disturbance, and mitigations—such as visitor education and nest protection—will help reduce impacts. Adaptive management strategies will be implemented if new issues arise. Monitoring beach crowding and maintaining low visitor densities (e.g., a threshold of 69 people per one-third mile at Nightingale Beach) will also help limit sand compaction and foot traffic impacts.

Overall, while increased access may slightly elevate risks to gopher tortoises and sea turtles, mitigation measures and adaptive management will minimize adverse effects.

Special Status Fish

There will be no in-water construction and therefore no impacts on Atlantic or shortnose sturgeon habitats.

The increased ferry service will overlap the confirmed spawning season for Atlantic sturgeon in Georgia (late summer and fall) and therefore, the risk of boat collisions will slightly increase for spawning sturgeon returning to the St. Marys River during these months, resulting in a slight adverse impact. However, migrant Atlantic sturgeon individuals that are not spawning in any given year are least likely to be present in Cumberland Sound between June and November and therefore the increased risk during much of the high visitation season will be confined to the portion of the route in the St. Marys River (approximately five miles).

Since Atlantic sturgeon are bottom feeders and shortnose sturgeon have a propensity toward river estuarine habitats, an increase in kayak and canoe activity in the vicinity of the island will not be anticipated to affect the fish.

Special Status Plants

No actions will occur within the lawn-like areas at Dungeness Mansion or Plum Orchard and therefore no impact on velvet sandy woods sedge is anticipated.

Wilderness Character

The potential for an expanded ferry schedule and service to Plum Orchard and the use of Hunt Camp campground may extend the frequency and distance day-use visitors travel into wilderness by dropping them off closer to the wilderness portions of the national seashore and allowing for an extended day on the island. As a result, access to *opportunities for solitude or primitive and unconfined recreation quality* of the wilderness in the national seashore will

increase. It is anticipated that many day-use visitors taking the ferry to Plum Orchard will focus their visit on touring the Plum Orchard Mansion and taking short hikes on the wilderness trails in the immediate vicinity. As a result, the *opportunities for solitude or primitive and unconfined recreation quality* may be minimally impacted by a higher concentration of visitors in the vicinity of Plum Orchard.

Monitoring indicators, such as encounter rates on trails in the wilderness area of the island, will be implemented to measure opportunities for solitude, allowing NPS management to use adaptive management strategies if these opportunities were threatened. This will result in long-term beneficial impacts on the *opportunities for solitude or primitive and unconfined recreation quality* of wilderness character in the national seashore.

Impacts on each of the wilderness qualities will continue to be greatest along trails and in proximity to the wilderness campsites and Plum Orchard, since access to other parts of designated and potential wilderness is more difficult and time-consuming. Given the dense vegetation that hinders off-trail access, the impacts will continue to be localized and minimal when compared to the overall amount of wilderness in the national seashore.

The *undeveloped quality* of wilderness and *opportunities for solitude or primitive and unconfined recreation quality* of wilderness will continue to be affected by ongoing park management activities. Opportunities to experience the *solitude or primitive and unconfined recreation quality* of wilderness will continue to be affected by nearby development outside of the park and during park managed hunts when the wilderness area of the park is closed to all except licensed hunters. The *natural quality* of wilderness will continue to be threatened by invasive species and benefit from management to control their spread.

Overall, repeated overnight human use and potential human disturbance to ecological systems in designated and potential wilderness areas will contribute to slight adverse long-term impacts on the *natural quality* of wilderness in these locations. Reducing the number of parties at each site and dispersing these uses will result in beneficial impacts on the *natural quality* of wilderness by reducing the footprint of impact. New campsites and the continued use and maintenance of trails will add to ongoing long-term impacts that degrade the *opportunities for solitude or primitive and unconfined recreation quality* of the designated wilderness. An increase in the dispersal of campers across additional sites will provide slight long-term benefits to the *opportunities for solitude or primitive and unconfined recreation quality*.

Although the selected alternative may result in localized adverse impacts on certain qualities of wilderness character, the National Park Service determined that these impacts would not impair wilderness character or fundamentally alter wilderness resources or experiences. The selected alternative disperses use, maintains visitor use limits, incorporates monitoring and adaptive management measures, and minimizes the intensity and extent of impacts within wilderness areas. The minimum requirements concept was incorporated into the plan, and a minimum requirements analysis will be completed prior to implementation of applicable actions to inform the development of measures intended to avoid or minimize impacts on wilderness character to the greatest extent practicable.

Visitor Use and Experience

Under alternative 2, beneficial and adverse impacts are likely to occur to visitor access, use, and quality of visitor experience. The NPS selected alternative management strategies aim to balance visitor use opportunities and resource protection at Cumberland Island National Seashore. Not all strategies will be implemented immediately, and some may be introduced in incremental phases or as determined necessary by monitoring.

Visitor access will be improved due to the expansion of visitor services offered through the concessioner, including possible access to Plum Orchard, though there may be short-term adverse impacts as visitors adapt to potential changes in service. Bicycle use may increase under the selected alternative, granting visitors more opportunities to experience different areas of the island, though visitors seeking solitude may encounter more people and frequent interruptions by others due to this increased bike use. This impact will be mitigated by management of the number of personal bikes transported on the ferry service and rented through the on-island concession. Use of e-bikes will have a long-term beneficial impact by allowing visitors who would typically visit the island in a passive way to participate in more active forms of recreation. Visitors will also gain opportunities for overnight use under the selected alternative, a long-term beneficial effect.

Although the selected alternative includes an increase in visitor use capacity, increased visitation alone does not inherently constitute a significant impact under NEPA. The visitor capacity framework established by the plan incorporates indicators, thresholds, monitoring, and adaptive management strategies intended to ensure that visitor use remains within levels protective of park resources, wilderness character, and visitor experience conditions. Thresholds were developed to identify changes in conditions before unacceptable impacts occur, and monitoring will occur throughout implementation of the plan. If conditions approach established thresholds, park managers may implement additional management actions, including modifying visitor access, adjusting use levels, increasing visitor education, or implementing temporal or spatial restrictions to prevent unacceptable impacts.

Implementing and managing visitor capacities at key attraction sites will provide beneficial impacts on experiential conditions. Some management strategies may alter visitor use patterns and access, resulting in both beneficial and adverse effects depending on an individual's perspective.

Socioeconomics

Visitation to Cumberland Island National Seashore will continue to provide beneficial impacts to the socioeconomics of St. Marys and other gateway communities. Businesses within the community will continue to benefit from visitor spending on goods and services such as lodging, retail, dining, and transportation services. If visitation slightly increases, local businesses will likely see increases in revenue from additional visitor spending, leading to long-term beneficial impacts. Under alternative 2, the potential expansion of visitor services, namely additional trips from St. Marys to the island, will impact concessioner operations both beneficially and adversely. While the potential expansion of services will create jobs and contribute to the economy, these services may require a concessioner to have an expanded fleet or infrastructure

to accommodate a slight increase in visitation. These changes will result in slight adverse impacts if the cost per ticket increases.

Under the selected alternative, the park will continue outreach to underserved populations and explore opportunities to provide more affordable access to the island, such as partnership with the ferry concessioner or philanthropic groups to aid potential visitors who are unable to afford the ferry fare. This will lead to long-term beneficial impacts to visitor socioeconomics. Overall, the selected alternative will result in slight adverse impacts in the short term as the community and business operations adapt but will have long-term beneficial impacts on socioeconomics.

Degree to Which the Proposed Action Affects Public Health and Safety

The selected action will prioritize public health and safety by expanding camping capacity, improving visitor facilities, and increasing recreational access. Adding new wilderness, backcountry, and frontcountry campsites disperses visitors more evenly across the island, reducing overcrowding but increasing the need for clear safety communication, emergency response coverage, and resource protection in more remote areas. New amenities—such as restrooms, outdoor showers, and shade pavilions—will improve sanitation, reduce heat-related risks, and enhance accessibility, directly supporting visitor well-being. Expanded visitor services, including kayak and canoe rentals and the sale of health and safety essentials, will help visitors better prepare for environmental hazards. Extending bicycle access on the beach and managing bicycle and e-bike numbers up to 100 per day introduces additional considerations for preventing user conflicts and maintaining safe travel conditions on trails, roads, and beaches. Overall, the selected action will enhance visitor comfort and access while requiring coordinated safety oversight to address increased use across a broader area of the island.

Degree to Which the Proposed Action Affects Economic Activity

The selected action will stimulate economic activity by increasing overall visitor capacity, diversifying recreation options, and expanding concessionaire opportunities on the island. Adding new wilderness, backcountry, and frontcountry campsites, along with improved facilities like restrooms, showers, and shade structures, will support higher visitation levels, which will in turn boost spending on ferry tickets, camping fees, rentals, and other visitor services. Opening Hunt Camp to public reservations and creating new campgrounds near Nightingale Beach will broaden the market for overnight stays. Expanded visitor services, including kayak and canoe rentals, flexible motorized tours, and the sale of health, safety, and camping essentials, will create new business opportunities for concessionaires and increase the economic value of each visitor's stay. Extending bicycle access on the beach and managing up to 100 bikes per day will also support rental demand and encourage longer, activity-rich visits. Collectively, these changes will enhance the island's recreational economy while distributing economic benefits across a wider range of service providers.

Degree to Which the Proposed Action Affects the Quality of Life of the American People

The selected action will enhance the quality of life for the American people by expanding opportunities for outdoor recreation, improving access to natural spaces, and strengthening the

infrastructure that supports safe and enjoyable public use. Increased camping capacity across wilderness, backcountry, and frontcountry areas will allow more individuals and families to experience restorative time in nature, which is consistently linked to improved physical and mental well-being. New visitor facilities, such as restrooms, showers, and shade pavilions, will make outdoor experiences more comfortable, accessible, and inclusive, particularly for visitors with mobility needs. Expanded visitor services, including kayak and canoe rentals, flexible tours, and the availability of safety and camping essentials, will support a wider range of recreational interests and help visitors engage with the park more confidently. Extending bicycle access on the beach and managing bike numbers will promote healthy, low-impact recreation, while reducing congestion. Collectively, these improvements will broaden public access to high-quality outdoor experiences, supporting national goals related to health, recreation, and equitable enjoyment of public lands.

AGENCY AND TRIBAL CONSULTATION

US Fish and Wildlife Service

Section 7(a)(2) of the Endangered Species Act requires each federal agency, in consultation with the Secretary of the Interior, to ensure that any action the agency authorizes, funds, or carries out is not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of designated critical habitats.

Because the visitor use management planning effort has spanned multiple planning processes, consultation occurred during both the earlier planning effort and the current effort. Consultation conducted for the earlier effort informed development of the updated plan and is summarized below for context.

For the earlier planning effort, the National Park Service initiated informal consultation with the USFWS Coastal Georgia Ecological Services Field Office in September 2019. Park staff met with USFWS representatives on October 2, 2019, to discuss the draft plan and potential impact on federally listed species and their critical habitats. Additional meetings and telephone discussions occurred between October and November 2019. Following release of the previous environmental assessment, the National Park Service transmitted a biological evaluation and requested concurrence from the USFWS and the National Oceanic and Atmospheric Administration (NOAA), National Marine Fisheries Service (NMFS). In December 2022, the USFWS concurred with NPS determinations in the biological evaluation but also noted that effects to species would not be beneficial and made additional recommendations for minimizing effects to species protected under the Endangered Species Act (ESA). Because no in-water work is proposed in this plan, NMFS concurred in March 2023 with the withdrawal of consultation for ESA species under NMFS management.

For the current effort, consultation was reinitiated in 2025, to address revisions to the plan and updated resource information. The most recent list of federally listed species was obtained from the USFWS Information for Planning and Consultation (IPaC) website on March 14, 2025. Following release of the current environmental assessment, the National Park Service provided the updated biological evaluation (appendix G) to the USFWS and requested review of the species analyzed, the impact determinations, and concurrence with those determinations. Park

staff met with USFWS representatives on June 5, 2025, and subsequent coordination occurred in June and July 2025 and April and May 2026. Known and potential species included the following: tricolored Bat (*Perimyotis subflavus*), West Indian manatee (*Trichechus manatus*), eastern black rail (*Laterallus jamaicensis jamaicensis*), piping plover (*Charadrius melodus*), red knot (*Calidris canutus rufa*), wood stork (*Mycteria americana*), monarch butterfly (*Danaus plexippus*), Eastern indigo snake (*Drymarchon couperi*), Carolina gopher frog (*Lithobates capito*), 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 Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*). The Atlantic sturgeon falls under the jurisdiction of the NMFS. On June 4, 2026, the USFWS concurred with NPS determinations in the biological evaluation and clarified that the effects to the species will not be beneficial. The June 4, 2026, concurrence letter satisfies ESA Section 7 consultation requirements for the selected alternative analyzed in the environmental assessment.

Coastal Zone Management Act Consistency Determination

The Coastal Zone Management Act was enacted by Congress to balance the competing demands of growth and development with the need to protect coastal resources (16 USC 1451 et seq.). The Georgia Coastal Management Program was established in 1998 and is administered by the Department of Natural Resources, Coastal Resources Division. Upon the 2019 public release of the environmental assessment, the consistency determination and a copy of the assessment were submitted to the Georgia Coastal Management Program for review. In 2025, the National Park Service reinitiated consultation on the updated plan. On June 18, 2025, the consistency determination and a copy of the draft assessment were submitted to the Georgia Coastal Management Program for review. On August 15, 2025, the Georgia Coastal Management Program provided a concurrence with the determination on topics subject to the state's authority.

Floodplain Management

Executive Order 11988, "Floodplain Management," requires the National Park Service and other federal agencies to evaluate the likely impacts of actions in floodplains. The objective of Executive Order 11988 is to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative. NPS procedures for complying with the floodplain executive order are outlined in NPS Director's Order 77-2: Floodplain Management and Procedural Manual 77-2 (Director's Order 77-2 and PM 77-1, respectively).

In accordance with Executive Order 11988, and NPS guidelines for implementing the order, the National Park Service has reviewed the flood hazards for proposed actions that fall within the designated floodplain on Cumberland Island and has determined that the proposed actions are consistent with NPS Floodplain policy.

Georgia Historic Preservation Division and Affiliated Tribes, Section 106 Consultation

Agencies that have direct or indirect jurisdiction over historic properties are required by section 106 of the National Historic Preservation Act of 1966, as amended (54 USC 306108) to take into account the effect of any undertaking on properties eligible for listing in the National Register of Historic Places. The National Park Service submitted a copy of the plan/EA to the Georgia Historic Preservation Division (HPD) for review on February 22, 2023. In a response dated March 22, 2023, the Environmental Review and Preservation Planning Department of the Georgia HPD concurred with the mitigation measures listed in the document, along with continued consultation. In 2025, consultation reinitiated on the updated plan. On July 17, 2025, the draft assessment was submitted to Georgia's Historic Preservation Division for review. The National Park Service received concurrence from the Historic Preservation Division in August 2025 regarding the special conditions, including conducting archaeological surveys and monitoring, consulting with HPD under Section 106 of the NHPA, and addressing unanticipated discoveries. The National Park Service will continue to consult with the HPD as future projects are developed according to this plan.

FINDING OF NO SIGNIFICANT IMPACT

As described throughout the VUM Plan/EA, implementation of the selected alternative has the potential to result in both beneficial and adverse impacts on park resources and values, including vegetation, wetlands, special status species, wilderness character, visitor use and experience, cultural resources, and socioeconomics. However, the National Park Service has determined that these impacts would not be significant, either individually or cumulatively, and can be avoided, minimized, or mitigated through the measures identified in this FONSI, the VUM Plan/EA, and associated compliance documentation.

The selected alternative includes management strategies intended to improve visitor access and recreational opportunities while protecting the natural, cultural, and wilderness resources of Cumberland Island National Seashore. The selected alternative would incrementally and adaptively manage visitor use through the establishment of visitor capacities, indicators, thresholds, and monitoring strategies designed to protect desired resource and visitor experience conditions. The plan includes measures to disperse use geographically, monitor sensitive resources, and implement adaptive management actions if thresholds are approached or exceeded.

Implementation of the selected alternative would result in localized and generally minor impacts associated with construction of new visitor facilities, campsites, trails, boardwalks, and related infrastructure. These impacts would primarily affect small areas of understory vegetation and limited wetland areas and would be minimized through sustainable design practices, avoidance and minimization measures, revegetation, and compliance with all applicable permitting and resource protection requirements. The overall scale of disturbance would represent a very small proportion of available habitat and affected resource areas within the national seashore.

The selected alternative may increase the potential for disturbance to certain federally listed and other special status species through increased visitor access, expanded ferry service, and

additional recreational use in some portions of the island. However, the National Park Service developed the plan in coordination with the U.S. Fish and Wildlife Service and incorporated mitigation measures, visitor education, seasonal restrictions, monitoring, and adaptive management strategies specifically intended to minimize adverse effects on protected species and habitats. The U.S. Fish and Wildlife Service concurred with the National Park Service's determinations under Section 7 of the Endangered Species Act.

The selected alternative would also result in some long-term adverse impacts on opportunities for solitude and primitive recreation in portions of designated wilderness due to increased visitor access and use. However, these impacts are expected to remain localized and limited in intensity and extent. The selected alternative incorporates wilderness monitoring indicators and thresholds intended to protect wilderness character and visitor experience conditions over time. The plan would also provide beneficial effects through the dispersal of camping use, rehabilitation of existing impacted areas, and implementation of management strategies intended to reduce concentrated visitor impacts within wilderness areas.

The National Park Service recognizes that the plan has generated substantial public interest and differing viewpoints regarding visitor use levels, ferry service, recreational access, and wilderness stewardship. Public concern and opposition, however, do not by themselves indicate that effects would be significant within the meaning of the National Environmental Policy Act. The National Park Service has carefully considered public and agency comments, incorporated revisions and clarifications into the final plan and errata and determined that the selected alternative would not result in highly uncertain, highly controversial, or significant adverse effects on the human environment.

The selected alternative was developed in coordination with federal and state agencies and in compliance with applicable environmental laws and executive orders, including the Endangered Species Act, National Historic Preservation Act, Coastal Zone Management Act, Executive Order 11988 (Floodplain Management), and Executive Order 11990 (Protection of Wetlands). Consultation and coordination efforts are summarized in this FONSI and documented in the administrative record.

CONCLUSION

Based on the environmental analysis presented in the Visitor Use Management Plan and Environmental Assessment, the implementation of mitigation measures, the results of agency consultation, and the consideration of public comments, the National Park Service has determined that the selected alternative will not result in significant impacts on the quality of the human environment. Accordingly, preparation of an environmental impact statement is not required.

ATTACHMENT A: PUBLIC COMMENT SUMMARY

INTRODUCTION

Cumberland Island National Seashore ("the park") initiated a 47-day public comment period for the *Visitor Use Management Plan and Environmental Assessment* (the VUM Plan/EA or the plan) on January 6, 2026, and the public was invited and encouraged to provide feedback on the document. The public's feedback during this public comment period was reviewed and analyzed for themes and substantive comments.

According to the Department of the Interior (DOI) NEPA Handbook (February 2026), substantive comments are those that 1) Question, with a reasoned basis related to the analysis, the accuracy of information in the Environmental Impact Statement (EIS) or Environmental Assessment (EA); 2) Question, with a reasoned basis related to the analysis, the adequacy of, methodology for, or assumptions used for the analysis; 3) Present new information relevant to the analysis; 4) Present reasonable alternatives or issues outside those analyzed in the EIS or EA, or those mentioned in the Notice of Intent; 5) Present relevant additional issues for analysis in the EIS or EA; or 6) Prompt potential changes or revisions to one or more of the alternatives.

During the public comment period, the National Park Service received 3,752 pieces of correspondence. Each correspondence was reviewed and specific comments within each unique correspondence were identified. The standard NPS practice is to respond to substantive comments that are submitted during the public review period for environmental assessments. However, NPS staff recognized that many of the non-substantive comments warranted a response due to the relevance and frequency the comment was represented in the correspondences or the importance of the comment to the plan and park management. Where needed, updates to the VUM Plan/EA are made via errata (see attachment C).

PUBLIC OUTREACH DURING THE COMMENT PERIOD

The National Park Service released an earlier draft of the plan for public review and comment on the NPS Planning, Environment, and Public Comment (PEPC) website (https://parkplanning.nps.gov/CUIS_VUM_Plan) in October 2022. The 2022 public comment period was announced via a media release and posted on social media platforms. On November 17, 2022, the National Park Service held a virtual public meeting to present the planning process and content of the draft plan, as well as answer questions from members of the public. The presentation, excluding the question-and-answer session, was recorded and later posted on YouTube with a link from the park's website. The park also conducted a targeted engagement session with key stakeholder groups. A frequently asked questions document was compiled based on questions and responses from the public meeting and posted to PEPC while the review period was open. The 2022 FAQ may be found at https://parkplanning.nps.gov/CUIS_VUM_Plan.

After the 2022 public review and comment period, the National Park Service considered the submitted correspondences to decide how to best reflect the suggestions and concerns received. This revised plan was shared in January 2026 via the NPS PEPC website. Most of the 3,752 correspondences received during the comment period opposed some of the key actions within

the plan including the proposed increase in the visitor capacity, the daily ferry delivery number, and the potential impacts to various seashore resources and wilderness character.

COMMENTS AND RESPONSES

Concern: Some commenters felt that the purpose of the visitor use management plan and actions presented in the NPS selected alternative do not align with the park's enabling legislation and wilderness designation.

NPS Response: The purpose of this plan is “to determine appropriate opportunities for visitors to use, experience, and enjoy Cumberland Island National Seashore and to develop strategies to concurrently protect resources.” The purpose of this plan and its subsequent actions directly align with the Cumberland Island National Seashore's enabling legislation, which states the park was established “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” (Statute at Large 86 Stat. 1066 - Public Law No. 92-536 (10/23/1972)). Both the purpose of this plan and the park's enabling legislation align with the overall mission of the National Park Service to “preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations.”

Approximately 20,617 acres of Cumberland Island National Seashore—9,907 acres of designated wilderness and an additional 10,710 acres of potential wilderness—are managed to protect the five qualities of wilderness character: untrammeled, natural, undeveloped, solitude or primitive and unconfined recreation, and other qualities. The purpose of this plan does not detract from the park's wilderness qualities. The proposed action on camping within wilderness would maintain the number of visitors in wilderness at one time, and further disperse camping, which would positively affect the natural quality of wilderness as described on pages 80-81 of the plan.

Concern: Commenters were concerned that allowing wilderness campers to access the Brickhill Bluff and Toohahowie sites by small, motorized watercraft could lead to visitors using motorized craft in the Wilderness.

NPS Response: This is unlikely to be an issue for several reasons. The first is that the plan is making only a minor adjustment to the current condition by adding the campsite at Toonahowie. Use of motorized vessels within Designated Wilderness is not observed to be an issue at the existing Brickhill Bluff campsite.

The plan is not changing where motorized boats can go or where the wilderness is located. The on-land portions of the park are Designated Wilderness. Motorized boats are not allowed to beach on land using the motor (users could turn off the motor and paddle onshore, though few do this due to the shallowness of the water and the high risk of becoming stuck). The submerged portions of the park are Potential Wilderness due to the non-conforming use of motorized boating. Motorized boats are allowed to be used here. Motorized boat users are allowed to anchor offshore and wade onto the land

(again, few do this due to the shallowness of the water near Brickhill Bluff and the same would apply at Toonahowie). Any access to these locations by motorized boat would be for drop-offs only, as overnight beaching of vessels within the National Seashore boundary is prohibited (Cumberland Island Superintendent's Compendium Section 2.10).

Overnight users of Brickhill Bluffs and Toonahowie campsites would be educated on these existing regulations as they obtain their permit to prevent any unauthorized use of motors in the designated Wilderness.

Concern: Commenters questioned why the National Park Service considered expanding commercial services, as well as the adequacy of the necessary and appropriate determination, especially when considering impacts to designated wilderness.

NPS Response: The National Park Service considered expanding commercial services to address the purpose and need of this plan, such as to “determine appropriate opportunities for visitors to use, experience, and enjoy the park.” The National Park Service evaluates commercial services as governed by the 1998 Concessions Management Improvement Act (PL 105-391) and those evaluations are documented in Appendices E and F of the plan. Current authorized commercial services include, but are not limited to, Land and Legacies Tour, guided walking and hiking tours, guided nonmotorized boat tours, and guided motorized boat tours.

The National Park Service acknowledges that wilderness and self-sufficiency in nature is a valuable experience on Cumberland Island; however, visitor safety is a top priority for the agency. The commercial services analysis within this plan evaluated the need for a camp store on the island through the necessary and appropriate criteria. The plan identified that a camp store meets the necessary and appropriate criteria, and the park may consider providing this service in partnership with a commercial operator in the future, pending interest from operators. A camp store assists the National Park Service in managing visitor use and provides an essential service or facility not available within a reasonable distance from the park. If visitors on the island need to purchase a necessary camping item that they do not have (e.g., it broke, was lost, or forgotten), a camp store would allow visitors to purchase such items without having to travel back to the mainland or call park staff for an emergency.

Appendixes E and F provide thorough analyses of the commercial visitor services and the extent necessary determination for commercial services in the Cumberland Island Wilderness, including rationale for each type of commercial service that is determined as necessary in wilderness. Park management would go through the appropriate NPS commercial services process (i.e., concession contracts, commercial use authorizations, leasing, and annual work planning) prior to making any changes.

Concern: Many commenters do not want motorized or mechanized use, specifically bike use, on roads in wilderness, other than the rights given to residents on Cumberland Island. They stated bike use is inconsistent with the Wilderness Act.

NPS Response: The plan does not propose any motorized or mechanized use (including bikes) within designated or potential wilderness. Bicycles and e-bikes are not allowed in wilderness (16 U.S.C. § 1133). The scale of the maps in the environmental assessment (figure 4 and figure 7) do not adequately show the wilderness boundaries as they relate to roads. A 25-foot right-of-way along Main Road, Plum Orchard Spur, and North Cut Road is not within designated or potential wilderness, as described in Figure 4 on page 21. This figure clarifies that bicycle and e-bike use along these roads is allowable since they are not within wilderness areas and are currently open to vehicular travel. Roads that are within designated wilderness are only open to bicycle and e-bike use by individuals with existing deeded rights.

Currently, bicycle and e-bike use occurs on the beach between Dungeness and Sea Camp and would be extended north to Stafford under the preferred alternative. This is also outside of the wilderness boundary. In compliance with the bike rule, once the NEPA process is complete, the park would prepare a Written Determination (WD) stating that bicycle use on 4.5 miles of the beach (and 18 miles of administrative roads) is consistent with the protection of the park area's natural, scenic and aesthetic values, safety considerations and management objectives, and would not disturb wildlife or park resources. The National Park Service would publish a notice in the Federal Register providing the public at least 30 days to review and comment on the written determination. After the 30-day public review period concludes, the Regional Director would evaluate whether to approve the written determination. If the Regional Director approves the written determination, the Superintendent may designate the trails for bicycle use and would provide notice of such designation to the public under 36 CFR 1.7. Bicycle and e-bike use within the park would be managed to provide for a safe recreational experience for visitors to the island. Visitors on bikes and e-bikes would be subject to the same speed limits described in the Superintendent's Compendium at section 4.21. Bicycles and e-bikes on the beach would be subject to the same dusk and dawn restrictions as vehicles (between May 1 and October 31). Bicycles and e-bikes would continue to be prohibited in wilderness areas.

Concern: Commenters expressed concern that e-bikes are an increasing use type at Cumberland Island, presenting anecdotal observations that they are now the dominant form of bicycle use. Commenters felt that the National Park Service did not adequately consider the potential effects of additional visitor use in the outer reaches of the park that these devices enable.

NPS Response: In developing the Visitor Use Management Plan/EA, the National Park Service thoroughly evaluated the impacts of e-bike use within the context of existing access and use patterns on Cumberland Island.

Currently, both traditional bicycles and e-bikes are permitted on 1.5 miles of beach between Dungeness and Sea Camp, as well as on the island's administrative roads. While the selected action would newly allow visitor bicycle use on approximately 3 miles of beach between Sea Camp and Stafford Beach, no additional areas are being opened to bicycle or e-bike access beyond this change; the same routes and destinations will otherwise remain accessible as before. Further, the daily limit of 100 bicycles ensures

that, even as e-bikes may enable some visitors to travel farther or more easily reach remote areas, the total number of people accessing these areas by bicycle will not exceed a manageable threshold.

This approach is part of an adaptive management framework. If monitoring indicates that the current limit is not sufficient to protect resources or visitor experience, the superintendent has the authority to adjust management prescriptions as needed.

Superintendents have the authority to allow e-bikes where traditional bicycles are allowed, as well as to limit or restrict their use. This management discretion ensures that superintendents have the flexibility to act quickly when needed, while also requiring transparency and public notification in accordance with 36 CFR 1.7.

Concern: Commenters noted that the plan is inconsistent regarding the speed limit for bicycles and e-bikes.

NPS Response: Commenters correctly note the inconsistencies. The document has been updated via errata as noted in Attachment C.

Concern: Commenters wondered how the plan addresses equity and financial accessibility (e.g., the cost of visiting the island), which is specifically mentioned in the plan's purpose and need.

NPS Response: As written on pages 1-2 of the plan, the purpose and need of the plan do not specifically mention equity nor financial accessibility. This plan addresses "providing visitors improved access" to park resources, which means improved opportunities to be able to access the park and enjoy its resources.

Regarding financial accessibility, or the cost of visiting the island via ferry, concession contracts are made between the National Park Service and private companies. These agreements must ensure that the business operation would be profitable for the company to operate per the Concession Management Improvement Act of 1998. Given the need to provide a reasonable business opportunity, and the input costs associated with operating a ferry and the likelihood these costs increase over time, there is little the National Park Service can do to reduce the overall cost of a ferry ride to the island. However, NPS managers would be receptive to any actionable proposal that would reduce costs for the visiting public, such as grant opportunities, cost-sharing, or similar partnerships.

Concern: Commenters asked for additional clarity related to the proposed changes to zoning, and stated the following specific concerns:

1. "Private interest zone" was not defined.
2. Out of concern for additional development on the island, some commenters wondered where future development would be allowed.
3. Which parcels are proposed for potential land exchange?
4. Desired conditions for "natural environment zone" described a place where "active recreational opportunities dominate" instead of passive recreation.
5. South End Beach would be designated as an environmental protection zone, but no proposed restrictions.

NPS Response:

1. As described on pages 13 and 18 of the plan, “the private interest zone includes areas that have some level of private, legal, or otherwise binding attachment to lands within the park boundary, “and was formerly known as the “special use zone” in prior park planning documents. Desired conditions for the private interest zone were not developed as part of this plan because these lands are outside of the management of the National Park Service.
2. NPS zoning does not control or influence what private development may or may not occur on lands within the NPS boundary but outside of NPS management. Development-related zoning on lands that are outside of NPS jurisdiction are the purview of local county government. Park management zoning can and would be updated as needed in the future should land ownership or boundary changes occur.
3. While the National Park Service is aware of the ongoing efforts to exchange privately held parcels on the island, these actions were not included in the environmental assessment due to the uncertainty associated with the potential land exchanges and potential private development.
4. As described in the glossary on page L-1, active recreation includes activities like “paddling, hiking, biking, backpacking, and camping,” while passive recreation includes “contemplative activities such as exploring historic sites, watching birds, and observing wilderness and natural areas.” The natural environment zone desired condition states that “active recreational opportunities dominate.” This statement means that active recreation is much more common than passive recreation in this zone and is an acknowledgement of the relative difficulty of accessing this zone. To get there, some form of active recreation is likely required. It is worth noting that the parkwide desired condition of visitors having opportunities for both active and passive recreation ensures that both active and passive recreation may occur parkwide.
5. A full and partial closure of South End Beach were both considered as actions within this plan and ultimately dismissed from further consideration. South End Beach was removed from the scope of this planning effort and will be addressed in a targeted planning effort, separate from this plan.

Concern: Commenters questioned the adequacy of the VUM Plan/EA. Some questioned how recent the data used within the environmental assessment is and if adequate baseline data was available while preparing the VUM Plan/EA. Several commenters requested that the National Park Service prepare an environmental impact statement (EIS) to properly discuss the severity of potential impacts. Specifically, commenters questioned the adequacy of addressing the following topics: Visitor experience (crowding from increase in visitation and public health and safety); water resources and quality; species/wildlife; ecosystem/ecological impacts; climate impacts; wilderness character; ferry delivery to Plum Orchard; dark skies and natural soundscapes; and dynamic coastal processes (i.e., pavilions proposed at Dungeness and Nightingale Beach and bathrooms within dunes).

NPS Response: The environmental assessment uses the most current and relevant data available. The impact topics analyzed were selected based on DOI policy, directing

analysis to focus on issues most connected to the proposed action. The plan evaluates vegetation, wetlands, special status species, character of designated and potential wilderness, visitor use and experience, and socioeconomics. Broader categories—such as general “ecosystem/ecological impacts,” “species/wildlife,” “dark skies,” or “natural soundscapes”—were not analyzed because current guidance requires focus on specific, measurable resources with a reasonable potential to be affected. Climate considerations are incorporated where appropriate using the best available science in accordance with current policy.

Impacts associated with potential crowding, visitor health and safety, and ferry delivery to Plum Orchard are addressed in the Visitor Use and Experience section. Public health and safety are further addressed in the FONSI. While water resources and quality were not addressed broadly, the Wetlands section does address water quality and floodplains were considered but dismissed from further analysis in Appendix K. Facilities at Dungeness and Nightingale Beach were planned inland to avoid impacts from coastal processes, and Appendix H provides additional analysis demonstrating consistency with coastal resource protections.

Regarding the appropriate NEPA Pathway, NPS managers determined that an Environmental Impact Statement is not necessary for this project. Per the DOI NEPA Handbook (February 2026), “a bureau should prepare an environmental impact statement only with respect to proposed actions that the bureau reasonably foresees would have a significant effect on the quality of the human environment. NEPA section 106(b)(1); 42 U.S.C. § 4336(b)(1). Whether an impact rises to the level of “significant” is a matter for a bureau’s expert judgment.” The planning team determined that the proposed action would not have a significant effect on the quality of the human environment and therefore prepared an environmental assessment for this plan. The degree of effects is further described and analyzed within the “Degree of Effects of the Action” section in this FONSI. As demonstrated in this section of the FONSI, no Environmental Impact Statement is needed as there are no significant effects associated with the proposed action.

Concern: Commenters questioned the rationale, need, and justification for increasing visitation via ferry delivery from 300 people per day to 600 people per day to the Dungeness and Sea Camp docks and an additional 100 people per day to Plum Orchard. They indicated that increasing daily ferry delivery may be inconsistent with the park’s purpose. They also pointed to visitor survey data that indicated only 13 percent of Seashore visitors felt that more ferry service was needed and indicated this was not considered in the analysis.

NPS Response: In planning for the Seashore’s future, the National Park Service must anticipate how visitor use may evolve over the next 50 years to ensure appropriate access, while continuing to protect the island’s resources and primitive character. As part of that long-range responsibility, the plan evaluates potential changes in ferry use to reduce access barriers during busy periods and support broader opportunities for public recreation. This effort to reduce barriers to access aligns with the EXPLORE Act (H.R. 6492), by supporting broader efforts to improve recreation opportunities on, and facilitate greater access to, federal public land.

The proposed ferry delivery limits are based on social science data, park expertise, an understanding of the relationship between the number of visitors delivered by ferry and observed use levels at locations on the island, and the desired conditions articulated for key locations on the island. This is described in detail in Appendix C. While commenters correctly describe the purpose of the park, it is incorrect to interpret this statement of purpose as precluding an increase in daily ferry visitation. In fact, the exercise of identifying thresholds, visitor capacities, and associated maximum ferry delivery is an effort to define the appropriate amount of “outstanding opportunities for outdoor recreation” while maintaining opportunities for “solitude” and protecting the park’s “primitive, undeveloped character” and its “scenic, scientific, and historical values.”

The 13 percent figure cited from a visitor survey reflects only visitors who were already able to secure ferry seats, limiting its salience in assessing the degree to which potential visitors may desire more opportunities to visit. Had those who were not successful in obtaining a seat on the ferry been surveyed, it is reasonable to assume a much higher proportion would have been concerned with the amount of ferry service. However, these would-be visitors are difficult to sample in a survey.

Based on the full analysis and professional judgment of park managers, the National Park Service concluded that the proposed ferry delivery levels align with all legal and policy requirements and will continue to safeguard Cumberland Island’s natural and cultural resources.

Concern: Commenters noted that the ferry delivery analysis relies on a small handful of thresholds and visitor capacities and express concern that this approach could mean that use in other locations could be inconsistent with desired conditions under the ferry deliveries described.

NPS Response: Commenters correctly note that the ferry delivery analysis for Sea Camp and Dungeness largely relies on the threshold for people per view at Nightingale Beach. This was a logical decision based on social science data and park staff expertise. As described in appendix C, page C-2, and elsewhere in the plan, “Researchers found a dominant travel pattern that was consistent across seasons. This travel pattern has visitors departing from Dungeness Dock, going to Dungeness Ruins first, to the Nightingale Beach area second, and ending at Sea Camp Dock.”

Given this dominant travel pattern, NPS staff considered locations along the well-trod path as most likely to be affected by changes in ferry delivery. NPS staff did consider how increased ferry delivery would impact Dungeness Ruins as indicated on page C-7. However, mathematical analysis indicated that a threshold at Nightingale Beach is “more constraining than Dungeness Ruins,” meaning that as daily ferry delivery were increased incrementally, the threshold would be reached at Nightingale Beach before a likely threshold at Dungeness Ruins would be reached.

In the case of ferry delivery to Plum Orchard, where ferry-based visitor use is hypothetical and not currently a reality, the ferry delivery analysis in appendix C for Plum Orchard largely relies on the visitor capacities at Plum Orchard, the Settlement, North Beach, and the threshold for encounters in designated Wilderness. This

methodology considers all the destinations that a visitor to Plum Orchard might reasonably visit.

Adjustments to ferry delivery would be based on conditions on the island as indicated by monitoring. So, if increased ferry delivery did exceed key thresholds and/or specific visitor capacities were exceeded, the ferry delivery would be reduced accordingly. Changes to the ferry service would be made under the next concession contract. The current ferry concession contract is set to expire in 2027. In anticipation of that expiration, the park staff will work with the National Park Service Commercial Service Program to develop a new concession contract. Once a concession operator is established, an annual operating plan is developed with authorized and required services. The details of ferry service, such as schedules, would be identified at that time. No change in ferry service operations is anticipated prior to award of a future concessions contract.

Concern: Commenters questioned the daily ferry delivery number and were concerned that the visitor capacity analysis ignores private boaters that arrive on the island without riding the ferry.

NPS Response: The current ferry delivery number, as established in the park's general management plan, does not account for the number of private boaters that can access the island. However, the visitor capacity analysis, found in Appendix B, is indifferent to means of arrival and applies to all people at various locations on the island regardless of how they got there. In this way, it accounts for private boaters that may access the island and ensures that desired conditions for resource protection and visitor experience are maintained by location. While the General Management Plan equated ferry delivery to capacity, this plan follows updated NPS guidance to treat the visitor capacity and the mechanism by which visitors arrive (i.e., the ferry) as related, but different numbers.

Additionally, the daily ferry delivery analysis does account for visitors that do not arrive by ferry within the prediction equation in Appendix C. Within the equation, the intercept of 2.2 can be understood to represent people who are present in the viewscape at Nightingale Beach in the absence of the ferry. In this way, the analysis does incorporate the volume of use that occurs beyond the ferry delivery.

Concern: Commenters noted that two visitor use studies referenced in the plan—Brownlee et al. 2019 and Hallo et al. 2012—reached different conclusions from those included in the plan in regard to the maximum number of people that could be delivered per day by ferry. They also noted other apparent discrepancies between the studies and conclusions in the plan.

NPS Response: While these studies were influential in informing the National Park Service's decisions as evidenced by their citations in the plan, they were not the only input. In addition to the social science research, park managers took into account public comment; law, regulation, and policy guiding park management; and professional judgment to ultimately inform a management decision. Guidance from the Interagency Visitor Use Management Council and determinations from Department of the Interior Solicitors is clear that visitor capacity is *not* an inherent property of place (that can be discovered through scientific study). Rather, it is a decision of the agency which is

informed by science. Like other agency decisions related to actions in a park (e.g., where to site a trail), there is no single “right” or “wrong” visitor capacity.

In the case of the 2018 study, the difference between the researchers’ conclusions as described in the report, and the NPS management decision stems from a different understanding of the appropriate number of people per view at Nightingale Beach. Regarding the 2012 study, NPS managers did not find data points related to the acceptability of different ferry delivery numbers to be particularly salient or instructive given the somewhat leading phrasing and visitors’ general preference to “keep things as they are.”

It is worth noting that NPS managers did not interpret the researchers’ findings from the reports in a vacuum, rather, they included those researchers in the conversations surrounding an appropriate threshold. Those researchers concurred with the National Park Service’s interpretation of the data and deemed it an appropriate and reasonable conclusion.

Concern: Commenters expressed concern that NPS managers may have been overly reliant on “social norm” surveys when establishing visitor capacities and thresholds in the plan. They requested that the National Park Service apply its expertise and professional judgment in determining appropriate levels of use.

NPS Response: While social norm studies and other social science research were influential in informing the National Park Service’s decisions, they were not the only input. In addition to the social science research, park managers took into account public comment; law, regulation, and policy guiding park management; and professional judgment to ultimately inform a management decision.

National Park Service *Management Policies 2006* defines “professional judgment” as “a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities in relation to the decision.”

Several of the public concerns and NPS responses in this attachment describe areas where NPS managers exercised their professional judgment to interpret multiple social science studies, which themselves had slightly different conclusions.

Concern: Commenters noted that the National Park Service did not consider how actions of the plan will interact with the proposed increase in daily ferry delivery to the island. They pointed to the Nightingale trail, pavilion, and campground as well as changes to bicycle management as actions that may change visitor use patterns on the island. They also noted that the National Park Service did not consider the potential for private arrivals to increase.

NPS Response: The exact nature and scale of these changes, and others like them, is difficult to predict. Overall, some of the actions will improve distribution (i.e., spread visitors out) while others may lead to some increased congregation in places (i.e.,

condense visitors together). NPS managers took into account the changes that are likely to be most impactful in their analysis. For example, in Appendix C, the analysis notes that changes in ferry delivery times may spread use throughout the day, and the use of smaller ferries may decrease the pulsing effect. At the same time, park managers are committing to monitoring that will serve to verify that conditions are consistent with articulated desired conditions. While NPS managers made a good faith effort to predict effects, ultimately, some error is inevitable as no predictive analysis will ever be perfect.

Concern: Commenters noted that the plan lacks specifics related to required monitoring to ensure actions do not affect ecological and visitor use conditions. They noted that the omission of detailed monitoring protocols prevents opportunities for public comment on these protocols. They raised concerns about the ability of the National Park Service to execute on the monitoring it has committed to.

NPS Response: Appendix D includes a table of monitoring activities in the plan that would ensure ecological and visitor use conditions are consistent with desired conditions. The indicators and thresholds in Appendix A include general monitoring strategies to give the public an indication of how monitoring may proceed.

The agency's decision on indicators concerns *what* will be monitored, which is why it is included with the other decisions in the plan. The tools that are used to implement the decisions, in this case monitoring techniques, are not a part of the decision themselves and therefore not included in the plan and EA. Changes in technology, funding, and staffing can all impact which monitoring approach is most feasible.

While it is an important practical question to ask, the ability of the National Park Service to implement a reasonable decision isn't the purview of NEPA. Indeed, the scope and scale of the monitoring commitment was a topic of great concern to NPS managers in the development of this plan. For that reason, the commitment to monitoring was scaled to the absolute minimum believed necessary to adequately monitor for changes in conditions on the island. However, whether the National Park Service will implement the action described is not for the NEPA document to address.

Concern: Numerous commenters expressed concern that the National Park Service only evaluated two alternatives, a no-action alternative and the preferred alternative. The commenters were concerned this was an inadequate range of alternatives to fully assess the impacts of visitor use and left the National Park Service with limited "choices," essentially creating an "all or nothing" proposal.

NPS Response: Per the DOI NEPA Handbook (Feb 2026), "Reasonable alternatives means a reasonable range of alternatives that are technically and economically feasible, meet the purpose and need for the proposed action, are within the jurisdiction of the bureau, and, where applicable, meet the goals of the applicant."

Department of Interior regulations Section 46.310 affirm that one action alternative is appropriate "when the Responsible Official determines that there are no unresolved conflicts about the proposed action with respect to alternative uses of available

resources, the environmental assessment need only consider the proposed action and does not need to consider additional alternatives, including the no action alternative.”

As part of the planning process, the National Park Service evaluated several potential management actions and strategies not included in the preferred alternative. These actions and strategies were dismissed from further consideration due to impacts to resources, cost, relative desirability from a visitor experience perspective, sustainability, safety, and other factors. Only the actions and strategies that best met the purpose and need for the plan were retained in the preferred alternative. A few of the potential actions and strategies dismissed from further analysis are documented in the “Alternatives and Actions Considered but Dismissed from Further Consideration” section of chapter 3.

Additionally, the “alternatives” in the plan and environmental assessment are intended only for analysis purposes and do not represent binary options or choices. Under NEPA, that National Park Service could select to implement parts of the action or no-action alternatives as part of the selected action. In this way, the preferred alternative presents a set of potential actions the National Park Service can select.

Concern: Commenters would like to know if the National Park Service would have the ability to reduce visitor numbers if impacts became too great.

NPS Response: As described in Appendix A: Indicators and Thresholds, the National Park Service would monitor specific indicators on the island to ensure conditions of concern remain within the identified range of acceptable conditions. The visitor capacities identified in Appendix B describe the expected maximum level of visitor use that different areas of the park could accommodate while ensuring conditions remain within identified key thresholds and/or specific visitor capacities. Likewise, Appendix C estimates the maximum number of people per day that could be delivered to the island while maintaining acceptable conditions. However, if monitoring carried out in accordance with Appendix A reveals that conditions are becoming unacceptable (impacts are becoming too great), then daily ferry delivery numbers would be adjusted accordingly before unacceptable impacts could occur (as described in the “the “Adaptive Management and Concessioner Operations” section of Appendix C).

Concern: Commenters noted that the plan does not include numbers, location, size or potential impacts from construction or operation of commercial operations.

NPS Response: As documented in Chapter 2, page 34, under the NPS preferred alternative, the park would consider expanding commercial services to provide additional visitor services. Existing or temporary infrastructure would be utilized to protect sensitive natural and/or cultural resources; therefore, mitigation measures and best practices would be taken to minimize construction. If additional construction is proposed, it would require additional NEPA analysis and compliance with applicable laws. The numbers, location, and size of commercial operators cannot be adequately defined at this time and will be incorporated into the concessions contract or in the commercial use authorization permit, depending on interest from local businesses.

Concern: Commenters expressed concern that the plan does not include adequate rationale for not including actions to protect the South End Beach. Commenters were concerned by the absence of resource protection for this area.

NPS Response: While this planning effort initially aimed to resolve emerging issues at the South End Beach, the response to previous drafts of the plan made clear that issues in this area are more complex than originally thought. Additional data collection is needed to inform more robust planning for this area, and a targeted purpose and need to guide planning would be helpful. Planning for this area would be addressed in a separate effort as described on page 42 of the plan.

Concern: Commenters questioned whether the changes in visitor use described in the plan, specifically the change to daily ferry delivery and necessary and appropriate commercial services, trigger Federal Register rulemaking requirements at 36 C.F.R. 1.5(b).

NPS Response: These requirements are not applicable. NPS regulations at 36 CFR 1.5 give superintendents discretionary authority to take certain actions, including establishing visiting hours, public use limits, closures, designations, conditions, and restrictions on visitor use of park areas. Paragraph (b) requires the National Park Service to complete rulemaking in the Federal Register for such actions when they meet certain criteria.

Changes to daily ferry delivery and other necessary and appropriate commercial services as described in the plan would not be implemented under the authority of 36 CFR 1.5, but rather under the terms and conditions of a concession contract, which is entered into between a commercial visitor service provider and the Regional Director or Director. Operating plans providing the details of ferry service would be subject to and consistent with the terms and conditions of the contract.

Concession contracts are governed by the regulations at 36 CFR part 51, not 36 CFR 1.5, and in general concession contracting authority is held by the Director or Regional Director, and is not delegated to superintendents. As a result, these ferry service changes would not be discretionary actions taken by the Superintendent of the National Seashore under the authorities granted in 36 CFR 1.5(a), and the rulemaking requirements in paragraph (b) therefore would not apply.

ATTACHMENT B: NON-IMPAIRMENT DETERMINATION

THE PROHIBITION ON IMPAIRMENT OF PARK RESOURCES AND VALUES

National Park Service (NPS) *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given NPS the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the NPS must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the NPS. It 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.

WHAT IS IMPAIRMENT?

National Park Service *Management Policies 2006*, section 1.4.5, “What Constitutes Impairment of Park Resources and Values,” and section 1.4.6, “What Constitutes Park Resources and Values,” provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible NPS manager, would 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).

Section 1.4.5 of NPS *Management Policies 2006* states:

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be 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.*

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Per section 1.4.6 of NPS *Management Policies 2006*, park resources and values that may be impaired include:

- the park’s scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and*

physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;

- *appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;*
- *the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and*
- *any additional attributes encompassed by the specific values and purposes for which the park was established*

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act unless the National Park Service was in some way responsible for the action.

HOW IS AN IMPAIRMENT DETERMINATION MADE?

Section 1.4.7 of *NPS Management Policies 2006*, states, “[I]n making a determination of whether there would be an impairment, an NPS decision maker must use his or her professional judgment.” This means that the decision maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969; consultations required under section 106 of the National Historic Preservation Act; relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

National Park Service *Management Policies 2006*, further defines “professional judgment” as “a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities in relation to the decision.”

NON-IMPAIRMENT DETERMINATION FOR THE SELECTED ALTERNATIVE

This determination on impairment has been prepared for the selected alternative (alternative 2) described in chapter 3 of the Visitor Use Management Plan/Environmental Assessment, December 2025, and revised with the FONSI and appended errata. The non-impairment determination does not include discussion of impacts on wilderness, visitor experience, socioeconomics, public health and safety, environmental justice, land use, park operations, etc., as these do not constitute impacts to park resources and values subject to the Organic Act non-impairment standard. A non-impairment determination is made for all resource impact topics analyzed in detail for the selected alternative except for visitor use and experience, wilderness,

and socioeconomics because impairment findings relate back to park resources. Visitor use and experience and socioeconomics are not generally considered to be a park resource under the Organic Act and cannot be impaired in the same way that an action can impair park resources.

Non-Impairment Finding for Vegetation

The park's foundation document identifies the significance of the park's ecological diversity, including its terrestrial habitats and specifically calls attention to the island's upland forest habitat and oak maritime forests (one of the largest remaining in the United States) (NPS 2014 – Foundation document). Protection of these plant species is fundamental to the park's purpose. Construction of facilities and trails will permanently remove approximately up to 6,800 square feet of vegetation. Mitigation efforts will include revegetation and minimizing vegetation loss where possible. However, the vegetation communities that will be affected make up a small percentage of the park (less than half a percent), are not rare, and can be found in abundance in the park. In addition, mitigation measures will be implemented to protect mature trees, revegetate areas, and control invasive plants. Therefore, no impairment of vegetation will occur under the selected alternative.

Non-Impairment Finding for Wetlands

Productive wetlands are fundamental to the park's purpose because they contribute to making Cumberland Island one of the most ecologically diverse barrier islands on the Atlantic Coast (NPS 2014). While the installation of elevated boardwalks will disturb wetlands in the project area, only approximately 165 square feet of wetland soils and wetland vegetation will be permanently affected. The overall functions of the wetlands will not be noticeably altered because of the small area of ground disturbance in relation to the total acres of wetlands present in the project areas. Elevated boardwalks will not impede the purpose of the park to maintain the ecological diversity, therefore, no impairment of wetlands will occur.

Non-Impairment Finding for Special Status Species

The presence of special status species contributes to making Cumberland Island one of the Atlantic Coast's most ecologically diverse barrier islands (NPS 2014). Special status species contribute to the fragile natural resources preserved and protected by the island's isolated setting, and provide visitors opportunities to experience outdoor recreation in an uncrowded, undeveloped setting. The presence of the intact barrier island system, which provides critical refuge to a magnificent variety of plant and animal species is fundamental to the park's purpose. While expanded ferry service and additional access to portions of the island will increase risks for vessel and vehicle collisions and disturbance, implementation of mitigation measures and the application of monitoring indicators and thresholds will minimize adverse impacts to special status species when compared to current conditions and provide potential for adaptive management strategies to protect them; therefore, no impairment of special status species will occur.

Additional impact topics considered during preparation of the environmental assessment, including floodplains, cultural resources, and certain species of special concern, were dismissed

from detailed analysis because implementation of the selected alternative will result in no effects or only negligible to inconsequential effects on these resources. The selected alternative will avoid or minimize impacts to floodplains and cultural resources through compliance with applicable laws, policies, and consultation requirements, and would not measurably affect the dismissed species of concern because they are not found within affected areas. In addition, future site-specific implementation actions would remain subject to applicable compliance requirements, including Section 106 consultation and floodplain review, as appropriate. Accordingly, the National Park Service determined that implementation of the selected alternative would not impair park resources or values associated with these dismissed impact topics.

Unacceptable impacts were also considered but will not occur. Impacts on these resources will be reduced through mitigation implementation as identified in the FONSI and Appendix H of the EA and adjustments would be made based on conditions on the island as indicated by monitoring. Each resource or value for which impairment is assessed and the reasons why impairment will not occur are described below.

CONCLUSION

The National Park Service has determined that implementation of the selected alternative will not constitute an impairment of the resources or values of the park. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, comments provided by the public and other agencies, and the professional judgment of the decision maker guided by the direction of NPS *Management Policies 2006*.

References

U.S Department of the Interior, National Park Service (NPS).

- 2014 *Foundation Document*, Cumberland Island National Seashore, Georgia. US Department of the Interior, National Park Service.

ATTACHMENT C: ERRATA

The following errata document changes to the text of the environmental assessment. Changes to the text below are noted by page number; additions to the text are denoted by underlined text and deletions are denoted by strikethrough text.

Ferry Delivery, Page 29:

If conditions approach their respective thresholds for these indicators, park managers ~~may make adjustments to ferry delivery in terms of the daily delivery number, timing of delivery, and spatial distribution of~~ will make adjustments to ferry delivery by working with the concessioner. Those adjustments may include changes to the daily delivery number, timing of delivery, and/or spatial distribution of delivery.

Alternative 2 Summary, Page 34:

Proposed visitor facilities would be fully ABAAS compliant for accessibility, to the extent practicable.

Special Status Species Analysis, Page 78:

Under alternative 2, proposed actions would contribute slight adverse impacts ~~and long-term beneficial impacts~~ on ongoing impacts on special status species.

Adaptive Management and Concessioner Operations, Page C-7:

If conditions approach their respective thresholds for these indicators, park managers may adjust the amount of visitors that should be delivered via the ferry in specific places and/or at specific times to ensure that desired conditions continue to be met at these key locations will make adjustments to ferry delivery by working with the concessioner. Those adjustments may include changes to the daily delivery number, timing of delivery, and/or spatial distribution of delivery.

Ferry Delivery, Page G-5:

If conditions approach their respective thresholds for these indicators, park managers ~~may make adjustments to ferry delivery in terms of the daily delivery number, timing of delivery, and spatial distribution of~~ will make adjustments to ferry delivery by working with the concessioner. Those adjustments may include changes to the daily delivery number, timing of delivery, and/or spatial distribution of delivery.

Appendix G, Page G-8:

~~A year-round, 20 MPH speed limit will be implemented for all bike/e-bike use on park roads and the beach.~~ Visitors on bikes and e-bikes would be subject to the same speed limits described in the Superintendent's Compendium at section 4.21.

Appendix G, Page G-40:

Although plovers do not nest on the island, their foraging and resting habitat can overlap the posted sensitive areas of other shorebirds. Implementation of adaptive management strategies to maintain these objectives would ~~result in slight beneficial~~ reduce negative impacts to the piping plover.

Across the island, impacts to piping plover would be minimized by the ~~beneficial~~ effects of the following: additional enforcement, additional educational signage regarding species sensitivity in various locations on the island that would aim to reduce disturbances and benefit shorebirds and other wildlife, including piping plover.

Appendix G, Page G-41:

Upon completion, the addition of these two pavilions, campground, and a bathhouse at Nightingale could reduce dune trampling by visitors in these areas resulting in a ~~beneficial~~ reduced negative impact to plover habitat.

Appendix G, Page G-42:

Upon completion, the addition of these two pavilions and a bath house at Nightingale could reduce dune trampling by visitors in these areas ~~resulting in a beneficial~~ and reduce negative impacts to red knot habitat.

Implementation of adaptive management strategies to maintain these objectives would ~~result in beneficial~~ reduce negative impacts to the piping plover and red knot. ~~Implementation of adaptive management strategies to maintain these objectives would result in beneficial impacts to the red knot.~~

Appendix G, Page G-44:

Upon completion, the addition of these two pavilions and a bathhouse at Nightingale could reduce dune trampling by visitors in these areas ~~resulting in a beneficial impact on monarch~~ habitat.

Appendix G, Page G-45:

Bicycle and e-bike use on the beach would continue to be prohibited between sunset and sunrise between May 1 and October 31, ~~and a reduced speed limit of 20 MPH for bicycles and e-bikes would be implemented year-round~~ and Visitors on bikes and e-bikes would be subject to the same speed limits described in the Superintendent's Compendium at section 4.21. Together, these new and ongoing efforts would reduce disturbance to sea turtles ~~and result in beneficial impacts~~ when compared to current conditions. The proposed project would have localized, beneficial impacts to coastal resources and uses by improving visitor use management and the public's access to natural, historic, and recreational resources within the coastal zone

Appendix G, Page G-46:

Implementation of adaptive management strategies to maintain these objectives would ~~result in beneficial~~ help reduce negative impacts to the sea turtles. Maintaining this low density use along key areas of the island's shorelines, would indirectly minimize the potential for sand compaction and heavy foot traffic. ~~Implementation of adaptive management strategies to maintain these objectives would result in beneficial impacts to sea turtles~~

Appendix H, Page H-10:

The proposed project would have localized, ~~beneficial~~ minimal impacts to coastal resources and uses by improving visitor use management and the public's access to natural, historic, and recreational resources within the coastal zone.

Multiple Locations Throughout the Document:

The word "trails" should instead read "trail" in several locations throughout the document. This change is made on pages 1, 41, 47, 48, 49, 73, 75, G-36, G-41, G-43, G-44, G-1-2. H 18, H-1-1, and J-2.

ATTACHMENT D: MINIMUM REQUIREMENTS ANALYSIS FRAMEWORK NPS WORKBOOK

TITLE

CUIS Visitor Use Management Plan—Wilderness Camping Opportunities

STEP 1: DETERMINE IF ADMINISTRATIVE ACTION MAY BE NECESSARY

Issue Statement

Cumberland Island National Seashore has developed a visitor use management plan (the plan) to establish appropriate opportunities for visitors to use, experience, and enjoy the island, while simultaneously safeguarding natural, cultural, scenic, and wilderness resources. The plan addresses long-standing questions about visitation levels, resource protection, access, and the evolving ways visitors reach and utilize different areas of the island. Given that more than half of Cumberland Island is designated or potential wilderness (approximately 20,617 acres), the planning process carefully evaluated how current and anticipated visitor use patterns may affect wilderness conditions, including reconsideration of the appropriate number and capacity of wilderness campsites to support and enhance visitor experiences while preserving wilderness character.

Primitive camping at existing wilderness campsites—Brickhill Bluff, Hickory Hill, and Yankee Paradise—is an appropriate and valued activity, supporting visitors’ ability to immerse themselves in a unique wilderness experience. However, concentrated overnight use at these sites has resulted in impacts to wilderness character, including vegetation trampling, soil compaction, and the potential spread of invasive plant species. While these campsites intentionally provide only basic clear areas for tents and a well to maintain a primitive camping experience, the current capacity and configuration (allowing up to four parties of six at each site) generates predictable usage patterns and localized impacts. Repeated use, while facilitating meaningful wilderness experiences, may alter the environment and influence visitor experiences by increasing the likelihood of encounters, diminishing opportunities for solitude, and reducing the sense of remoteness expected in a wilderness setting. Development of the plan provided an opportunity to reconsider wilderness camping opportunities in the context of current and anticipated future visitation to ensure primitive camping remains sustainable and preserves wilderness character to the greatest extent practicable.

Options Outside of Wilderness

Is this issue wilderness dependent, or can an action occur outside of wilderness to properly resolve the issue now or over time?

Can the issue be resolved or addressed outside of wilderness?

☐ YES

STOP – EXPLAIN BELOW AND DO NOT TAKE ACTION

☒ NO

EXPLAIN BELOW AND PROCEED TO THE NEXT

The issue cannot be resolved outside of wilderness because the conditions prompting concern—vegetation trampling, soil compaction, invasive species risks, and reduced opportunities for solitude—occur at the existing wilderness campsites. These impacts arise from on-site use within wilderness boundaries and therefore cannot be addressed solely through actions in non-wilderness areas.

Although broader visitor distribution patterns, ferry arrivals, and frontcountry access influence how visitors recreate within the wilderness, these external factors only contribute indirectly. The core issue remains rooted in resource and experiential impacts occurring within the wilderness campsite environments themselves and the opportunity to improve the wilderness visitor experience, making it impossible to fully resolve outside of wilderness.

Criteria for Determining Necessity

Do any of the criteria below apply?

A. Wilderness Character

Based on the Issue Statement, are any of the qualities of wilderness character degraded, impaired, or threatened, or is action necessary to preserve/maintain one or more of the five qualities of wilderness character?

UNTRAMMELED

Select your answer.

☐ YES

☒ NO

The untrammeled quality is a measurement of how "wild" the wilderness is. It monitors actions that intentionally manipulate or control ecological systems, which if allowed to occur, would affect wilderness character. This quality is typically preserved when no action is taken to control, hinder, or manipulate the natural functioning of the ecosystem. Any human manipulation that is intended to manipulate or control the biophysical environment, regardless of impact (i.e., benefit or detriment), is considered a trammel upon the wilderness.

While there is increased invasive species risk within wilderness campsites due to disturbances such as soil compaction, these disturbances, and therefore the spread of invasive species, are not an intentional manipulation of the biophysical environment. Although ongoing and future management actions to control the spread of invasive species on the island help to minimize the spread of invasive plant species and their impacts, this is not a core component or proposed action associated with the issue at hand. Therefore, action is not necessary to preserve this quality.

UNDEVELOPED

Select your answer.

☐ YES ☒ NO

The undeveloped quality is preserved when wilderness retains its "primeval character and influence," and is essentially "without permanent improvements" or modern human occupation. This quality is influenced by the section 4(c) prohibited uses which are the presence of modern structures, installations, habitations, and the use of motor vehicles, motorized equipment, or mechanical transport. This quality is preserved by the absence of structures and installations and refraining from these prohibited uses.

Per Reference Manual 41: NPS Wilderness Definitions, an installation is anything made by humans that is not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness. Although installations, including wells and signage, are present at the existing wilderness campsites, these features have historically been deemed necessary for the continued operation of these camps. The wells provide access to a water source on a remote island whereas the signage provides affirmation to visitors that they are in the correct location and reduces the risk of resource damage from campsite creep. These features would remain a part of any campsite considerations; therefore, action is not necessary to preserve this quality.

NATURAL

Select your answer.

☒ YES ☐ NO

Historically, wilderness is strongly associated with protecting and preserving ecological systems from the impacts of modern people. Wilderness ecological systems are substantially free from the effects of modern civilization. This quality is preserved or improved by restoring ecological processes and can be degraded by the alteration of those processes.

The concentrated use of the existing wilderness campsites has resulted in impacts to the natural quality, including vegetation trampling, soil compaction, and the increased threat of invasive plant species. While these conditions are not unexpected for a designated campsite, even a primitive one, opportunities may exist to lessen the impact on the natural environment. Therefore, action may be necessary to preserve or improve this quality.

OUTSTANDING OPPORTUNITIES FOR SOLITUDE or PRIMITIVE and UNCONFINED RECREATION

Select your answer.

☒ YES ☐ NO

This quality is comprised of two sub-parts: (1) opportunities for solitude, and (2) opportunities for primitive and unconfined recreation. This quality is primarily about the opportunity for people to experience wilderness and is influenced by settings that affect these opportunities. This quality is preserved or improved by management actions that reduce visitor encounters, signs of modern civilization inside wilderness, agency-provided recreation facilities, and management restrictions on visitor behavior.

Visitor encounters at designated wilderness campsites—where up to four parties of six may occupy small, cleared areas at once—can reduce the sense of solitude and the primitive, self-reliant experience these sites are intended to provide. Concentrated use increases the likelihood that campers will see or hear other parties, diminishing unconfined recreation opportunities and the feeling of remoteness central to this wilderness quality. Capacity limits at campsites also create predictable clustering of visitors, which further elevates encounter rates and can erode the experiential setting. Although each campsite includes an agency-provided well, these wells are longstanding features essential for safe overnight use in a remote environment and would remain part of any future campsite considerations.

Because visitor encounters and campsite capacity pressures directly influence whether visitors can experience outstanding opportunities for solitude or primitive, unconfined recreation, action may be necessary to preserve this quality of wilderness character.

OTHER FEATURES OF VALUE

Select your answer.

☐ YES ☒ NO

The Wilderness Act says wilderness areas "may also contain ecological, geological, or other features of scientific, educational, scenic, or historical use" that reflect the character of this wilderness. From this wording, this quality focuses on "features" and features typically occur in specific locations, whereas the other four qualities apply throughout an entire wilderness. While many different types of features could be included in this quality, the intent is to include those that significantly contribute to the setting of the wilderness and understanding of its wilderness character. This quality is degraded by loss or damage to these features.

Numerous culturally significant sites within the national seashore are evident from American Indian inhabitants, plantation regime, and Carnegie-era development. However, none of these occur within or are threatened by the existing primitive campsites. Therefore, action is not necessary to preserve this quality.

B. Valid Existing Rights

Select your answer.

Is action necessary to satisfy a valid existing right? If so, cite the specific right, terms and conditions, and source.

☐ YES ☒ NO

C. Special Provisions of Wilderness Legislation

Is action necessary to satisfy a special provision in wilderness legislation (i.e., Section 4(d) of the Wilderness Act of 1964 or subsequent wilderness-enabling laws) that requires action? Cite law and section.

☐ YES ☒ NO

D. Requirements of Other Federal Laws

*Not including special provisions found in wilderness-enabling laws, does another Federal law, by itself or as implemented or interpreted through EO, court order, etc., **require** action? Cite law and section.*

☐ YES ☒ NO

STEP 1: DETERMINATION – IS ADMINISTRATIVE ACTION NECESSARY IN WILDERNESS?

Based on the responses and detailed explanations in A through D above, is there a need to proceed to Step 2? If at least one criterion in B through D in Step 1 has been met, or at least one quality of wilderness character is threatened, check the “Yes” box and provide a thorough explanation of the rationale described in A through D. It may also be helpful to describe in this determination how action would be consistent with the public purposes of wilderness or satisfy a specific agency obligation. If none of the criteria have been met, action is NOT necessary. Check the “No” box, explain why the proposed project does not meet the criteria, and stop your analysis.

☒ YES **EXPLAIN BELOW AND COMPLETE STEP 2 OF THE MRAF**

☐ NO **STOP – EXPLAIN BELOW AND DO NOT TAKE ACTION**

Administrative action within wilderness is necessary to preserve and address impacts to the natural and opportunities for solitude or primitive, unconfined recreation qualities. Concentrated use at existing campsites has resulted in both ecological and experiential challenges—vegetation trampling, soil compaction, threats from invasive species, and reduced chance of solitude—that occur directly within wilderness boundaries and cannot be sufficiently remedied by actions outside the wilderness. Taking administrative action is also consistent with the public purposes of wilderness, specifically recreation and conservation. By reevaluating the factors that affect wilderness camping, including visitor capacity, the number of camping options, and restoration of impacted areas, the park can safeguard both the natural environment and the quality of recreational opportunities. Therefore, actions related to wilderness camping, as contemplated in the plan, are both necessary and appropriate to ensure the preservation of wilderness character and support the public purposes of wilderness.

The development of the plan offered a valuable opportunity to thoughtfully reassess wilderness camping opportunities and proactively identify strategies that minimize impacts to wilderness character and enhance the wilderness visitor experience. This included expanding camping opportunities both in and near the wilderness, closing and restoring a campsite to improve unacceptable impacts, and reducing capacity at individual wilderness campsites to improve opportunities for solitude while maintaining capacity across all sites thus preserving opportunities for primitive recreation. Prior to implementation of the proposed actions, Step 2 of this minimum requirements analysis will be further developed and finalized to identify the techniques and types of equipment needed to ensure that impacts on wilderness resources and character are minimized.