

**Cumberland Island National Seashore
Visitor Use Management Plan**

PUBLIC COMMENT SUMMARY REPORT

May 2019



CONTENTS

EXECUTIVE SUMMARY	1
CORRESPONDENCE ANALYSIS	2
DEFINITION OF TERMS	5
COMMENT SUMMARY	6
Visitor Use and Visitor Experience.....	6
Campsites.....	9
Facilities/Structures/Amenities.....	10
South End Beach	12
Natural Resources	12
Cultural Resources	13
Interpretation and Education	13
Wayfinding	13
Trails and Trail Use	13
Bikes and Bike Use.....	14
Commercial Activity.....	15
Miscellaneous Strategies.....	16
Campfires	17
General Accessibility	17
Miscellaneous Comments that May Be of Interest to the Park in Future Planning Efforts	18
Figure 1.	3

EXECUTIVE SUMMARY

From March 26 through May 12, 2019, the National Park Service (NPS) held a public comment period to receive feedback on draft strategies for future visitor use management of Cumberland Island National Seashore.

To inform the public of the draft strategies under consideration and provide an update on the planning effort, a newsletter was released on March 27 that described the key issues, planning time line, draft strategies, prompting questions, and instructions for how to comment. The newsletter was made available on the project website (parkplanning.nps.gov/cuis) and was sent to interested parties by mail and e-mail.

In addition to the newsletter, National Park Service staff hosted two public listening sessions to provide interested members of the public an opportunity to learn more about the planning effort and share their ideas. The first was held at St. Marys, Georgia, on April 12 and the second was held in Atlanta, Georgia, on April 13.

A total of 73 people attended the two public listening sessions. The availability of the newsletter; the length of the comment period; and the dates, times, and locations for the public listening sessions were publicized by a media release issued on March 27, posts on the park's Facebook page, updates to the park's website, and flyers posted in St. Marys and Atlanta.

While the full breadth of comments received is summarized in this comment summary report, the following paragraphs provide a brief summary of the most commonly heard opinions and suggestions.

Overall, a large number of the comments received (about half) included comments on the topics of visitor use and visitor experience. Many commenters expressed that they would like to see Cumberland Island retain its current primitive character. Commenters also provided a range of thoughts and opinions about how many people per day could be on the island. About a third of the commenters provided comments about use levels, supporting infrastructure, and other issues related to managing visitor use of the island wilderness area. More comments opposed changing the island use levels than supported it.

Approximately one-fifth of the correspondences included comments related to potential commercial services on the island or other thoughts on what commercial services should or should not be available on the island and where they should be located. Also, approximately one-fifth of correspondences include comments about camping options, both in campgrounds and backcountry camping. While a variety of comments were provided concerning new or potential changes to camping, there was little support for campfires in backcountry campsites and strong support for allowing boats in campsites.

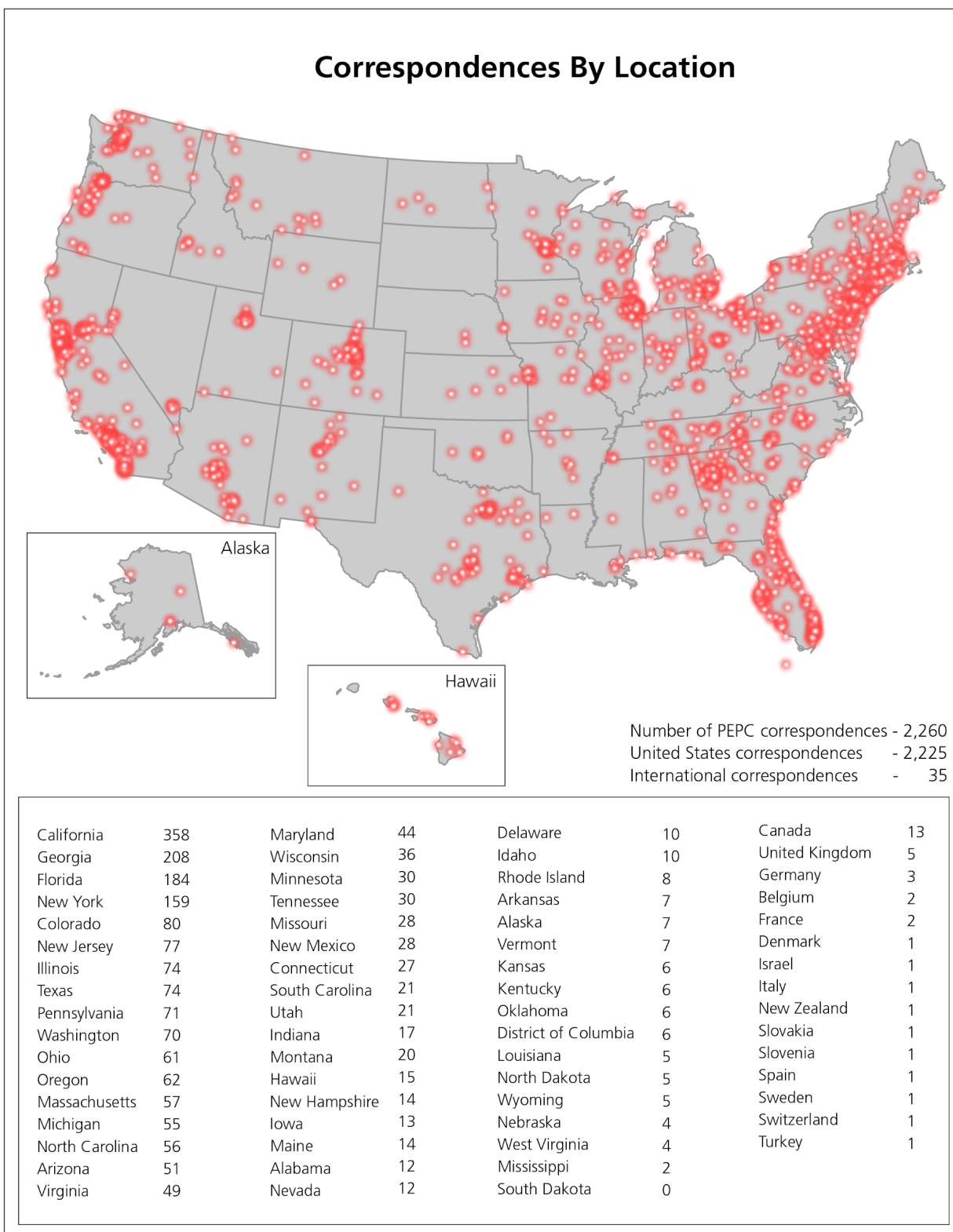
CORRESPONDENCE ANALYSIS

During the public comment period, the National Park Service received 2,260 individual correspondences directly on the Planning, Environment & Public Comment (PEPC) website, via e-mail, or through mail correspondence.

The National Park Service collected public comments on this early phase of the planning effort in order to understand public perspectives on key issues and draft strategies for visitor use management at Cumberland Island National Seashore. Within this process, thoughts and ideas from individuals, organizations, and agencies are analyzed and considered equally. For this reason, the unique content of comments, rather than the number of times a comment was received, will be used to guide the development of a range of reasonable management alternatives for the plan. This comment report summarizes all public comments received during this comment period.

Comments were received from 49 states (only South Dakota was not represented), the District of Columbia, and 15 foreign countries. The following table and map provides the geographic distribution of public comments that were submitted.

Figure 1. Geographic Distribution of Correspondences



In addition to general public comments, the National Park Service received letters from official representatives of the following agencies and organizations:

- United States Department of the Interior, Fish and Wildlife Service
- Wilderness Watch
- Southern Environmental Law Center and the National Parks Conservation Association
- City of Kingsland, Georgia
- Ramapo College of New Jersey (#140 and 1922)
- Georgia Conservancy (#2097)
- Georgia Department of Natural Resources (#1141)
- City of St. Marys (#134)
- Camden County Chamber of Commerce, Joint Development Authority (#99)

DEFINITION OF TERMS

The following definitions are used for the associated terms in this document.

Correspondence. A correspondence is the entire document received from a commenter. It can be in the form of a letter, written comment form, note card, or other written communication on the plan to the park.

Comment. A comment is a portion of the text in a correspondence that addresses a single subject or issue. It could include such information as an expression of support or opposition to the use of draft strategy, a suggestion for a potential management strategy, or additional data regarding existing conditions or key issues.

Comment Summary. A description of a group of comments that are focused on a common subject. Comment summaries combine similar comments.

COMMENT SUMMARY

Three questions were posed to commenters to provide targeted feedback on the draft strategies. These questions included:

- Which potential management strategies in the plan do you feel would be most helpful in meeting the vision for the future and why?
- Do you have other suggestions that could address the plan's key issues that you would like to be considered?
- Do you have ideas around accessibility, bike use, trails, paddle trails, etc., that you would like to be considered?

In the comment summary that follows, major concepts and unique perspectives are represented for each of the categories and topic areas for which the National Park Service received comments that were related to how the park manages visitor use and how visitors experience the park. These categories represent the major themes that were gleaned from the correspondence analysis that were within the scope of the visitor use management plan. These categories and topic areas include:

- Visitor Use and Visitor Experience
- Campsites
- Facilities/Structures/Amenities
- South Beach
- Natural Resources
- Cultural Resources
- Interpretation and Education
- Wayfinding
- Trails and Trail Use
- Bikes and Bike Use
- Commercial Activity
- Miscellaneous Strategies
- Miscellaneous Comments that May Be of Interest to the Park in Future Planning Efforts (out of scope for this planning effort)

VISITOR USE AND VISITOR EXPERIENCE

Visitor Use Levels. The National Park Service received comments both in favor and opposed to increasing visitor use levels on the island. Comments that supported increased use offered various

new levels for daily visitation ranging from 350 to 400, 450, 500, 600, and one comment that mentioned 1,000 visits per day. A couple comments noted that the current 300 number was set arbitrarily at the beginning of the park's history, adding that it is too restrictive and additional visits could be accommodated while still achieving desired conditions. Comments that supported an increase in visitor use levels generally advocated for focusing on increased visitation in the southern portion of the park and away from the wilderness areas of the park. However, some comments advocated for dispersing visitors across the island so they are not concentrated in the Sea Camp and Dungeness areas.

Some comments in support of increasing visitor use levels proposed using an adaptive approach, either by increasing visitation incrementally over time or increasing the level while monitoring for the occurrence of adverse impacts to resources or visitor experiences. A commenter stated that capacity should include campers from previous days and visitors who arrive by private watercraft, while another stated that backcountry campers should be excluded from capacity tallies.

Several comments advocated for a reevaluation of the ferry's winter season operations as a means of increasing visitor access. Comments supported increasing ferry operations to 365 days a year, shortening the winter season when the ferry only operates five days per week, or potentially using smaller boats in the winter when fewer people visit.

Some comments in support of increasing use levels argued that doing so could bring additional attention to the island and the local area, increase operational funding, and increase opportunities for people to share the island experience with family and friends.

Many commenters expressed a desire for visitor use level to be kept at 300 people per day, while some commenters advocated for decreasing the number to 100 or 250 if the science supported doing so. Most of these comments, however, argued for maintaining the status quo and not increasing visitation to the island. Some commenters stated that the island as a whole or specific areas on the island such as Stafford Beach are already overcrowded and do not support quality experiences, with a few stating that they currently do not enjoy the island due to high or increasing levels of visitation. Comments supported maintaining the status quo because the island should be a place without crowds unlike many of the other islands on the east coast, and because increasing visitation would harm the fragile ecosystem and natural resources such as habitats for sea turtles and shore birds. A commenter did state that the opportunity to be alone on the beach is a desired condition, and increasing the visitation level would potentially work against this condition.

While the majority of comments supporting keeping the level at 300 simply stated that desire, some did provide additional rationales. Commenters noted that keeping the overall usage level low would preserve opportunities to experience nature in the backcountry and maintain this magical experience. A few commenters supported the 300 number with an "if it ain't broke, don't fix it" type of argument. They noted that the visitation number has been fixed at 300 people per day for 40 years and that this visitor use level has successfully protected park resources and preserved the primitive feel of the island. A few commenters put this argument in historical context by adding that visitor capacities on the order of 1,480 or 10,000 people per day were proposed, and ultimately dismissed in favor of the 300 number. They noted that had these other proposals been adopted, the condition and experience on the island would likely be very different. One added that if the National Park Service were to change the limit, the agency would need to explain why the 300-person per day limit was no longer valid and the rationale for any new proposed limits.

Commenters noted that on many days, the ferry is not at capacity, indicating that demand does not currently necessitate an increase in visitor use levels. Others added that they would prefer to wait

and visit at a future date than visit with crowded conditions. Some commenters brought up budget considerations and the issue that the National Park Service may struggle to protect the island with increased visitation under current budget constraints.

Finally, a few commenters observed that identification of visitor capacities and visitor use levels will be a challenging task because it will require assessment of how visitor experiences deteriorate as more people are allowed on the island and how visitation impacts wildlife. Commenters noted that detailed studies would be needed before any decision to change the use level. Relatedly, one commenter noted that the park's current method of counting official visitation misses many visitors to areas of the island managed by the National Park Service, and that nonofficial visitation can at times exceed official visitation.

Visitor Experiences and Values. Many commenters expressed a strong desire for the National Park Service to maintain the character of Cumberland Island National Seashore in its current condition. Commenters variously described this character as rustic, wild, primitive, undeveloped, and rugged. A number of comments stressed the importance of the island's Wilderness designation and the purpose of the national seashore to "maintain the primitive undeveloped character of one of the largest and most ecologically diverse barrier islands on the Atlantic coast. . ." (quoted from park purpose statement, Foundation Document, 2014). Many commenters felt that the National Park Service has not kept the promise of a wild Cumberland Island, and urged the agency to protect and restore the island to a primitive condition. Other commenters looked to the agency to uphold its strong tradition of protection of the island. In some cases, comments urged preventing increased visitation, or any visitation at all, so the island could return to a natural condition. These comments tended to mention that human activity is detrimental to wilderness.

Some comments noted that the island is a special place where people can get away from the noise and environmental degradation found elsewhere along the eastern seaboard. Several of these comments focused on the quiet soundscape on the island and urged the National Park Service to maintain one of the few peaceful places left in the region. Some comments even noted the benefits of outdoor recreation in quiet places to the reduction of stress and anxiety.

Several comments noted that the island is a place where visitors can have transformative experiences and that opportunities for these experiences should be preserved. Some of the experiential opportunities commenters noted: connecting with nature and one's self, learning about the importance of preserving wild places, practicing responsibility and self-sufficiency, enjoying the solitude and natural quiet, and being in fellowship or communion with nature.

Many commenters expressed concerns about the potential for increased commercialism or development on the island. Most of these comments urged the National Park Service not to pursue additional tourist amenities or services. While the comments saw minimizing commercialism and maintaining a degree of difficulty as a way to preserve the rustic feel of the island, other commenters argued that services such as sunscreen and insect repellent could make visits more enjoyable and safe, and thereby improve overall visitor comfort and reduce the potential for unpleasant visitor experiences.

Motor vehicles were a common subject of many comments, with many commenters asserting that motor vehicle use should be prohibited or limited in some way. Some advocated for eliminating motor vehicle use altogether, suggesting the National Park Service use its jurisdiction over roads that access the beach to eliminate this access. Others maintained that motor vehicle use that isn't specifically authorized by private existing rights should be prohibited.

Island and Area Access. Overall, comments expressed support for additional access options on the island and offered numerous suggestions. Several comments expressed a desire for improved access options to the North End, especially for those unable to hike that far, either due to time or ability. Along these lines, it was suggested that ferry service be provided to Plum Orchard with the potential for transport from Brunswick or another surrounding area. In addition, numerous commenters suggested alternative methods for transport on the island such as increased van services, a tram, shuttle, golf cart transport, or the use of pedicabs to improve access. It was noted that the need for this has been compounded by the closure of the Dungeness Dock, which has resulted in longer walking distances to portions of the island. Several comments expressed general opposition to any increased access to the park due to concern for impacts on resources.

Numerous comments expressed support for continued access by private boaters and even a willingness to pay for dinghy access. It was suggested that short-term docking facilities be provided at Sea Camp, Plum Orchard, and Dungeness Dock during daylight hours. Continued access for a manageable level of access to South End was also mentioned. In contrast, a few comments specifically opposed private boat access to South End.

Additional suggestions received included increased opportunities for access by regional school students, consideration of economic accessibility, and the possibility of an annual pass for county residents.

While beyond the scope of this plan, one comment was received requesting the park service limit access to beach driving and to require permits for development in the island's private inholdings. Another comment expressed opposition to the current ban of carts north of Sea Camp.

CAMPSITES

Backcountry Campsites. Many commenters expressed opposition to new campsites, citing concerns that new sites would detract from the primitive and undeveloped character of wilderness and suggested the park allow dispersed camping in lieu of designated sites. Many also stated that all use should be monitored and usage should be further limited to prevent impacts on resources. Others supported further dispersing visitors by increasing the number of campsites without increasing the number of permits. One suggested that wilderness camping should not increase unless NPS staffing is increased; others cited concerns that the park does not have enough law enforcement rangers to respond to visitor incidents or emergencies on the north end of the island. One commenter suggested keeping the number of backcountry camping permits at current levels to maintain desired resource conditions consistent with the purpose for which the area was established as a way to offset increased visitation and corresponding amenities at the southern portions of the park.

Many commenters opposed creating a campsite in the settlement area, expressing concern about potential vandalism; the impact on the safety, privacy, and security of island residents; the negative impact of van tours and traffic on campers; an increase in traffic to support additional programs and campsites; and the likelihood that campers would rely on island residents for support during emergencies. In lieu of a campsite at the settlement, one commenter suggested increasing capacity and facilities at Brickhill Bluff to provide access to the Settlement while minimizing the impact on retained rights homeowners.

Several commenters supported adding campsites at Toonahowie and Beach Creek. Others expressed opposition to new campsites at Lake Whitney and Long Point citing concerns about the impact to sensitive natural habitat, particularly to endangered/threatened species such as turtles, terns, and other sea birds; others expressed concern about the potential risk to campers caused by alligators,

high tides, or storm events. One commenter opposed a new campsite at Beach Creek and suggested moving the site inland to reduce impacts to the sensitive area. A small few supported adding campsites at the Settlement, Long Point, and Lake Whitney.

Other commenters suggested providing a water source and/or privy at each backcountry campsite; eliminating wilderness camping and limiting overnight stays to the southern part of the island; adding a wilderness campsite close to the beach; adding a campsite to the bluff near Terrapin Point Trail; adding a campsite north of Candler Road on Cedar Dock Road; limiting wilderness overnight stays to one to two nights; rotating wilderness campsites to allow them to recover; and limiting the number of wilderness campers by employing a lottery system. A few commenters urged the National Park Service to analyze current use, demand, and impact to ensure that additional sites will not impair campers' experience of solitude before any new sites are added.

A few commenters requested that hand pump water sources be added at Hickory Hill, Yankee Paradise, and Lake Whitney. Other suggestions included adding filters at current backcountry water sources to remove sulfur and adding a spigot somewhere in Sea Camp for visitors to be able to refill their water bottles.

Kayak Accessible Campsites. Many commenters expressed support for canoe and kayak accessible campsites. Several shared concerns that if the sites were accessible by motorized boats, wilderness character would be negatively impacted, trash at the sites may increase, and unauthorized access to the island may occur. Others expressed concern that the National Park Service may be unable to manage the new sites given limited staffing levels.

Sea Camp and Stafford Campsites. Many commenters supported adding three new campsites at Sea Camp. One suggested adding new sites if those without a proper buffer were closed; another suggested yurts in lieu of campsites; and another suggested adding the campsites to the new Nightingale connection or lowering the maximum occupancy for new sites to reduce resource impacts and maintain visitor enjoyment. Several opposed creating any new campsites citing further loss of privacy and solitude and an increase in traffic. One commenter supported additional campsites at Stafford campground and suggested that the sites be moved farther away from the road.

FACILITIES/STRUCTURES/AMENITIES

Many commenters supported maintaining minimalistic and bare-necessity style facilities on the island. Commenters noted that the undeveloped character of Cumberland Island is a unique experience on the East Coast. A majority of commenters urged the park to limit any new development to that which is necessary to administer the island. Commenters expressed general support to improving facilities between Sea Camp and Dungeness and generally opposed facility changes outside this area. Commenters expressed concern with adding new facilities, especially as it related to viewsheds, park operations, and storm and sea level rise impacts.

Resource Impacts. Some commenters expressed concerned with adding more visitors to the island because that would require more facilities and services, including more parking at St. Marys and generally more parkwide staff. A few commenters expressed concern with adding new facilities and maintenance responsibilities given the current park maintenance backlog. Multiple commenters stated the current lack of trash cans and noted that the current carry-in, carry-out policy may become harder to enforce. Commenters requested trash receptacles be added to the island and urged the park to consider the trash implications from higher visitation. Similarly, commenters expressed concern that providing food services on the island would further impact the racoon population at the campsites. To help with this, commenters suggested adding bear boxes at all campsites in Sea Camp.

Restrooms and Viewing Platforms. Many commenters supported adding restrooms near the beach as well as latrines in the backcountry. Multiple commenters noted that adding a bath house at Nightingale would detract from the character of the area. A handful of commenters supported new restrooms and showers in this area. There was a suggestion to place the Nightingale bath house west of the main road. Many commenters supported the addition of pavilions and viewing platforms because they would provide visitors a respite from the elements. Commenters noted a desire to maintain beaches free of humanmade structures and suggested placing new facilities behind the dune line, obscured from the beach and ocean. Many commenters supported adding restrooms for visitors who explore outside the main developed areas.

Docks. Multiple commenters urged the park to prioritize the repair and reopening of Dungeness Dock and suggested dedicating dock areas for dinghies and day boat users. Commenters noted the limited docking spaces and conflicts that sometimes arise with powerboats. A few commenters suggested charging a daily docking fee to help cover dock repair expenses. There was also a suggestion to consider creating a short-stay buoy field for transient boaters, as well as outlining how boaters tie up to help maximize dock access.

North End. A few commenters noted that facilities in wilderness should be allowed to deteriorate and suggested that unoccupied buildings in the wilderness area be removed. Commenters also suggested that no additional development be allowed to occur in wilderness. There was a suggestion to move the church to the south end of the island to improve visitor access and avoid the need of motorized use adjacent to the wilderness area. Furthermore, there was concern with rerouting pedestrian use from the main road and the road becoming part of the Land and Legacies Tour.

Ice House Museum. Other comments included updating or rebuilding the Ice House Museum and rebuilding Dungeness with private-sector support to provide visitors the opportunity to experience what the Carnegies enjoyed.

South End Beach

Most commenters were opposed to adding or expanding facilities in the South End Beach area. Many noted the potential adverse impacts to natural resources, including nesting shorebirds, as a reason for not adding facilities. Commenters were concerned that more facilities would increase visitation to the area and that those visitors would not be properly educated about their potential adverse impacts to the resources. Commenters noted that if facilities were expanded in the South End Beach area, there would need to be a park service presence to address the potential increase in visitors through education and enforcement of regulations. Several commenters noted that this increased presence may be difficult for the park to maintain. Fewer commenters were in favor of additional facilities in this area for the day visitor and private boaters, but stated that the facilities should be minimal in order to protect the sensitive habitat and not detract from the undeveloped nature of the island. Of the few that were in favor of expanded facilities, they also expressed concern that additional facilities might increase visitation and would require additional park staff in the area to manage visitors. Many commenters were generally in favor of active management of visitors on the south end of the island.

NATURAL RESOURCES

Parkwide. The majority of commenters encouraged the park to restore, preserve, and maintain natural, more primitive and wild conditions on Cumberland Island. Concern was expressed over increasing visitation to the island because of the potential for increased impacts to natural resources. One comment expressed support for additional visitors so long as an increase could be managed to avoid impacts to the natural environment. One comment expressed opposition to daily ferry access on the island due to potential disruption to wildlife. Comments expressed support of additional activities such as kayaks and dispersed campsites, as long as they were managed to prevent damage to the island's natural resources.

Commenters expressed support for prioritizing wilderness and wildlife conservation and the potential for increased enforcement of regulations that protect these resources. Suggestions were made to provide additional interpretation and signage that promotes the island's sensitive natural environment and provides information on how the public can protect it. Concern was expressed over additional development on the island, including campsites, and the potential effect on species biodiversity from inadvertent visitor impacts. Along this line, a commenter provided an example on how the bathhouse at Stafford has affected the wilderness character and visitor experience in that area and expressed concern with further development having similar impacts. Commenters also expressed support for limiting bicycle use and off-road vehicle use to preserve the sensitive ecosystems.

South End. A large number of comments were received expressing concern over sensitive shorebird nesting habitat at South End. Numerous commenters opposed any development in the area fearing it would promote additional visitation that could disturb dune stability and the success of numerous sensitive and protected shorebird species that nest there in higher concentrations than elsewhere on the island. Commenters also noted that sea level rise may inundate this portion of the island, rendering any structures placed there unusable. Other commenters suggested either limiting visitation to a small area away from the western area most heavily used by birds, or alternatively improving access to Front Beach to entice visitors to go elsewhere. Overall, commenters were concerned about impacts to shoreline habitat and nesting shorebirds at South End resulting from increased visitation by private boaters and their dogs and were in support of increased management to address these issues. One commenter however, expressed concern about what additional management at South End would look like.

CULTURAL RESOURCES

A handful of comments mentioned cultural resources found on the island. Overall, commenters interested in the history of the island requested more representation of Native Americans—the island’s early inhabitants, and the history of enslaved people who once lived at the Settlement and potentially more access to the Settlement area.

Some commenters interested in limiting access to the northern portion of the island proposed creating a replica of the First African Baptist Church or moving the historic structure to Dungeness or Sea Camp. This would provide visitors an opportunity to see the type of structure where John F. Kennedy Jr. and Carolyn Bessette were married without increasing visitation to the building at its current location in the Settlement. They felt that this approach would limit impacts to the building and the wilderness adjacent to the main road and make it easier for visitors to have this experience outside current tour options. One of these commenters also questioned the appropriateness of operating a kayak rental facility in any of the historic districts on the island.

INTERPRETATION AND EDUCATION

Some commenters wanted more interpretation and educational opportunities related to the island’s past inhabitants and natural environment, resource protection, visitor impacts and appropriate behaviors, and shorebirds. Suggestions varied from creating additional educational materials and signs related to historic structures and park policies to ranger-guided driving or walking tours. Additional locations for interpretive programs or guided tour stops mentioned in comments included the Settlement, South End, and Sea Camp; interpretive signage was requested at Dungeness and South End. One commenter felt strongly that the Junior Ranger Program should be updated to utilize new technology and apps for an interactive scavenger hunt experience. A few commenters wanted the park to expand its offerings for school groups and the interpretation available at St. Marys museum and on the ferry. One commenter asked for Ice House Museum hours to be extended to better accommodate visitors taking the Land and Legacies tour. Another commenter suggested offering shorter driving tours to accommodate those with physical limitations, although other commenters felt strongly that all driving tours should be banned due to their effects on traffic and solitude. One commenter urged the park to embrace the Urban Agenda Call to Action Initiative.

WAYFINDING

A few commenters requested more directional signage to the ferry dock and on the island. Suggested places for improved visitor orientation information include along I-95, more wayfinding between the ferry departure area and park museum, clearer signage at Sea Camp and directions to Sea Camp Beach, better visual trail markers, private road/property postings, rules/regulations relating to waste disposal, and visitor outreach and resource protection for shorebird nesting areas at the south end. One commenter requested better signage on the southern end of Cumberland Island, especially around the ruins, and most especially around the outbuildings near the “Grange.”

TRAILS AND TRAIL USE

Dungeness to Nightingale and Parallel Beach Trails. The majority of comments were in support of the proposed changes to the Dungeness / Nightingale-Parallel Trail Connector. Overall, there was support for these trails to promote diverting pedestrians off of Grand Avenue and onto the trails and to hopefully dissipate high traffic areas and the potential for degradation. One comment did suggest keeping that portion of the road pedestrian friendly and not incorporating it into one of the land-based auto tours. While the majority of comments were supportive of the proposed trail expansions in this area, there was some concern raised over the idea of creating new access while also

maintaining the existing access. One commenter felt extending the trail to Sea Camp was unnecessary.

A few comments suggested alternative routes for the proposed new trails, some noting that access should be improved here or even farther north to divert people away from the more sensitive beach areas at South End. Alternative suggestions included shifting Nightingale Trail to the main road intersection to align the primary beach access with the new bathhouse. It was also suggested that the Nightingale Trail should become the primary and Architectural Barriers Act (ABA)-compliant accessible route for beach-oriented visitation once the Dungeness Trail is repaired. One commenter recommended that the Dungeness Trail be converted solely to a service trail following the completion of the Nightingale Trail.

Proposed Trail and Trail Changes at South End. Comments regarding extending a trail from the Dungeness area to South End were mixed. Numerous comments were in support of extending the trail as a way to connect people to other parts of the park and meet visitor demand to this area; however, several commenters raised concern about keeping some areas on the south end undisturbed. Similarly, comments regarding abandoning a section of the existing South End Trail near the marshes were mixed with some comments in support and others in opposition.

One alternative route for the new trail involved shifting the proposed Beach Creek campground farther north and away from the main creek channel and constructing a trail from the campground east and then south along the westernmost dune ridge to intersect the South End Trail. This alternative would eliminate the new westward trail connection to the ponds and South End woodlands.

General Trail Design and Construction. Most commenters were in support of proposed new trails on the island; however, numerous comments received made suggestions for elements of the proposed trail design and construction. Several commenters suggested paving a bicycle path or providing separate hiking and biking trails or bicycle lanes. It was also suggested that a paved bike path be provided to Plum Orchard so families and visitors could explore that area of the island more quickly without the need to take a van tour. The use of loops was suggested as a means of distributing visitors more evenly. It was also suggested that all trails be made ABA-accessible.

Commenters suggested the use of sustainable materials in trail construction and the use of natural barriers to prevent visitors from going off trail. The use of intentional trail routing, signage, and enforcement was suggested to prevent visitors from accessing known sensitive areas.

On the contrary, a few commenters opposed the idea of new roads and trails and felt only that the existing trails should be maintained. Commenters stressed the desire to maintain the wild, remote, and pristine characteristics of the wilderness areas by limiting trails in the park. Similarly, concern was expressed that if access was broadened equally to all trails, it would hinder the experience of those seeking a more rugged/unique experience.

BIKES AND BIKE USE

Numerous commenters stated that allowing bike access on the main road would make it easier for bikes to illegally enter wilderness, and also expressed concern over the potential for adverse impacts from bikes to the wilderness character, the visitors' wilderness experience, and the park's natural resources. These same commenters advocated for restricting bike use to the southern end of the island, below Stafford. A few commenters stated that hardening road and trail surfaces would allow people of all ages and abilities to access more of the island by bicycle. Others suggested that bike use could be allowed if it was managed to prevent damage to park resources and to prevent people from

accessing the wilderness areas. There was a suggestion to plot and monitor bike trails on the island as well as bike rentals and determine how many bikes would be allowed on the island at any one time. Some commented that there should be no additional fees charged for transporting personal bikes on the ferry. There was a comment to offer tricycles for those who would prefer them and they could be reserved at time of ticket purchase. Another commenter asked if safety regulations are being met by allowing bikes and autos to share a single lane sand road.

COMMERCIAL ACTIVITY

Comments overwhelmingly supported limiting commercial services on the island to help maintain the primitive and undeveloped character of the park. Commenters noted that in this time, there is too much commercialization and one of the attractions of Cumberland Island is being able to get away from it all. Commenters expressed concerns that expanding commercial services would require adding facilities such as storage buildings and it would require additional oversight from the already limited park staff. Additionally, commenters noted that commercial visitor services should be limited and closely monitored to avoid impacts to park resources and visitor experience. Fewer commenters expressed support to increase commercial visitor services on the island and generally supported providing such services at the south end of the island. Guided services of Dungeness and between Dungeness and Plum Orchard were generally supported. Some commenters expressed concern with increasing motorized traffic through the main road and suggested that new services to the north end of the island be provided as an option to the existing land-based tours instead of additions. A few commenters requested that any commercial visitor service opportunities considered are advertised among a variety of providers.

Basic Supplies Store. Many commenters noted that people visit Cumberland Island to escape modern conveniences and questioned their need at the island given the availability of sundries at the local businesses in St. Marys and at the ferry. Some commenters noted that having basic supplies near a ferry terminal would enhance the visitor experience. A few commenters noted that providing opportunities to buy supplies on the island would discourage visitors from planning ahead and being self-reliant during their visit. Many commenters expressed concern with selling bottled products on the island due to the trash implications. Commenters suggested selling reusable water bottles and providing water bottle filling stations. There was mixed support for providing an ice machine on the island with some commenters noting that it would improve visitor experience while others noting that ice can be bought on the ferry.

Plum Orchard. There was a suggestion to conduct a cost benefit analysis that takes into account the additional investment and improvements that would need to be completed at Plum Orchard to support higher visitation. A few commenters noted that in its current condition, Plum Orchard would not be able to support additional visitation.

Noncamping Overnight Accommodations. A few commenters suggested adding basic overnight (noncamping) accommodations for rent between Sea Camp and Dungeness to house visitors who are no longer able or willing to camp at the island, but who are still interested in visiting the park. Some of the suggestions included building “duck cabins” similar to the ones built by the Carnegies or building sustainable tree houses, cabins, or yurts that support ecotourism. However, one commenter noted that each of the buildings in the park has a story for the public to experience and therefore they should not be repurposed or leased.

Kayak Rentals. Multiple commenters supported providing kayak rental opportunities on the island and generally supported avoiding this use at Sea Camp to prevent disrupting campers as well as crowding in that area. Many commenters expressed concern that renting kayaks would increase the

need for law enforcement and rescue personnel given the environment of the island. Additionally, some commenters were concerned that inexperienced kayakers would create safety problems with boaters.

South End. A few commenters supported permitting services where commercial boat operators could beach on the south end of the island to drop off and potentially guide visitors. One commenter suggested that all commercial visitor tours landing on the seashore be required to obtain a commercial use permit and be required to complete a course about the sensitive resources of the seashore. The commenter suggested that commercial tour providers' noncompliance with park regulations should result in loss of permit and access.

Variety of Commercial Tours. Some commenters expressed hope that offering a greater variety of commercially guided tours (length, location, scheduling, and price point) would allow more visitors the opportunity to participate in such tours and learn more about Cumberland Island. Multiple commenters expressed support for commercially guided walking tours, pedicab tours, and commercial visitor services that expand opportunities for visitors with mobility challenges. Other suggestions for commercially guided tours included guided bike tours, guided paddle trips, and guided boat tours to Plum Orchard. Commenters were concerned with the high cost associated with visiting the park. A few commenters suggested that visitors should have more opportunities to participate in guided tours at no extra cost.

Ferry Service. Many commenters supported providing ferry service to Plum Orchard. Commenters who supported additional ferry service to the island suggested using smaller ferries with more frequent service that would disperse visitors. Multiple commenters suggested that the additional smaller ferry services should replace, not add to the current larger ferry. A few commenters questioned whether there was demand for year-round service. Additional landing sites suggested included somewhere that would allow access to the Settlement area, a landing site north of Greyfield, service from Fernandina Beach marina and from Amelia Island. Fewer commenters opposed providing ferry service to Plum Orchard due to its proximity to wilderness and the negative effects it would have on the wilderness experience.

Other Suggestions. Commenters suggested a variety of activities and services be considered as commercial visitor services including golf cart rentals for visitors with limited mobility as well as for visitors desiring to explore the island on their own; providing ecotourism opportunities; and providing annual passes for local residents.

MISCELLANEOUS STRATEGIES

Additional Comments. Several commenters had general suggestions related to the management of the park, the proposed strategies in the plan, and the public listening sessions. Recommendations for the management of the island included improvements to the online camping reservation website, a fund donation container at several locations in St. Marys, faster renovations to the park dock in St. Marys after Hurricane Irma, the need for additional park employees on the island (for briefings and to respond to injured or ill hikers), and the increased cost of getting to the island for families, which could potentially be remedied with a discount for those who live in the area. One commenter noted that the park already has maintenance and facility needs that it cannot address due to budget shortfalls, and thus advised caution in moving forward with building new visitor facilities. It was suggested that the park should be more explicit in its description of the facilities in the plan newsletter. For instance, one commenter would like more detail about whether the comfort station identified in the newsletter would be a pit or flush toilet, with potable or nonpotable water. Another commenter suggested that using a question and answer format with a large group at the public

listening session would be more transparent than one-on-one discussions between park staff and individuals. Finally, one commenter suggested that the plan's timeline be shifted to release the decision document in the fall or winter to allow the park ample time to implement the plan and minimize confusion before peak visitation.

New Management Strategies. Commenters suggested a wide range of new management strategies, some of which are related to visitor use and others of which may prove informational for park managers in the future. Several commenters expressed interest in mooring balls, docks, or some other way of improving access for private visitors arriving to the Sea Camp area. Others asked park managers to look into possibilities for overnight lodging on the island, whether in expired life estate properties or newly constructed duck cabins, tree houses, or yurts. One commenter recommended relocating the beach access trail that currently goes through Sea Camp to another location to decrease foot traffic in the campground.

A few commenters noted the high cost of visiting the park with a family of four (in excess of \$100), and suggested methods to increase visitation to the island by local, low-income residents, including a partnership with local businesses and the ferry concession to develop a program that would allow local families to fill empty seats on the ferry during the off-peak season. A few commenters also encouraged the creation of, or offered to help initiate, a friends group for Cumberland Island to help with funding.

Commenters recommended new management strategies related to interpretive offerings on the island including more organized tours focused on topics such as history, wildlife, plant life, and conservation; a guided water-based tour of the island; expansion of the Ice House Museum, more options on the south end such as the Grange and Maintenance Barn, and rebuilding Dungeness so visitors could have a historic experience.

If a water trail is to be developed, commenters advised that paddlers would likely be novice and recommended that buoys be used to provide clear direction, the number of kayakers on the water at one time be limited, and kayaks only be rented during fair weather.

Commenters also suggested the park host biannual cleanups with volunteers in the spring and fall off-season and that an emergency phone be installed at the Sea Camp Ranger Station.

Campfires

Comments received overwhelmingly opposed allowing campfires in designated wilderness campsites. Rationale for the opposition included the following: the threat to visitors, natural and cultural resources and the property of retained rights holders; the lack of fire management capacity on the island; the potential for fire pits to become trash pits; the likelihood that campers would gather dead and live wood from the wilderness area; and the potential for wildfire.

One comment supported the use of campfires as being in line with Native American activity on the island over the last 5,000 years and another expressed support for continuing to allow campfires at Sea Camp and Stafford Beach campsites.

General Accessibility

Many commenters expressed support for making Cumberland Island more accessible to more people. A few commenters noted that accessibility of boarding experience in St. Marys should be assessed and improved. Commenters noted that the proposed facility improvements could improve accessibility and suggested that providing an accessible path to the beach should be a high priority

for this planning effort. Wheelchair accessible ramps for the new boardwalks and viewing platforms were suggested. Many commenters suggested providing some form of transportation between the ferry landing sites and adjacent sites including Dungeness, Sea Camp, and Nightingale Beach trailhead. Commenters suggested using golf carts to provide free transportation for people with limited mobility and/or allowing commercial services like pedicab to improve accessibility, especially during the summer. A few commenters suggested increasing the number of motorized commercial tours to enable mobility-impaired visitors the opportunity to experience the park. A few commenters urged that when assessing the accessibility of the island to consider economic means as well as visitor ability. A few commenters expressed concern with trying to make all of Cumberland Island accessible due to the impact it may have on the natural habitat and character of the island.

MISCELLANEOUS COMMENTS THAT MAY BE OF INTEREST TO THE PARK IN FUTURE PLANNING EFFORTS

Numerous comments were received regarding management actions in the park that are beyond the scope of this visitor use management plan. Natural resources issues included fire management and management of the feral horse and feral pig populations on the island. While applicable to the management of natural resources in the park, management of these resources is and/or will be addressed in other resource management planning efforts. The use of private resident vehicles on the island and management of vehicles using state-issued beach driving permits are also beyond the scope of this plan because they are activities regulated by established agreements, authorizations, and regulations. One commenter also encouraged the National Park Service to move expeditiously to dispose of expired retained rights structures so that wilderness could reclaim the landscape as the Wilderness Act and park enabling legislation envisioned. These issues are addressed in the park's Former Reserved Properties Management Plan.