



300 Osborne Street
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December 28, 2022

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

Submitted via online portal & electronically sent to Superintendent to ensure proper formatting and clickable links are provided

Re: Cumberland Island National Seashore Proposed Visitor Use Management Plan & Environmental Assessment

Dear Superintendent Ingram and the Planning Team:

Thank you for the opportunity to comment on the Visitor Use Management Plan for Cumberland Island National Seashore. St. Marys Riverkeeper submits the following comments on behalf of the St. Marys River and Riverkeeper Members and Supporters.

St. Marys Riverkeeper (Riverkeeper) is a 501(c)3 private environmental advocacy organization that was formed in 2016 with the charge to protect the St. Marys River from harm and engage the community that calls the watershed home in that protection. Our work as an independent voice for the St. Marys River is made possible by the financial support of donations and memberships of concerned citizens within the watershed and surrounding region. The St. Marys River is the focus of our work to improve water quality in areas that are designated as swimmable and/or fishable, ensure the river thrives for future generations with our work on resiliency projects and community partnerships, promote low impact development in a fast-growing area, and advocate against industrial threats in our underserved communities.

As a border river, the St. Marys River watershed comprises four counties – two in Georgia and two in Florida with roughly 60,000 residents who depend on the health of the river for tourism, recreation, commercial fishing, and safe drinking water. Arising from the Okefenokee Swamp, the St. Marys River flows 130 miles to the Atlantic Ocean at Cumberland Island National Seashore. The watershed has more than 3,000 miles of streams and tributaries, is comprised of 40% wetlands, and is home to many endangered and threatened species such as the Atlantic Sturgeon

Riverkeeper is concerned that the National Park Service (NPS) fails to adequately address the impacts of the Visitor Use Management Plan's (The Plan) proposed action, specifically to provide appropriate accommodations for the projected increased number of visitors. This includes the unlimited access to the island by private boaters and unmentioned water quality monitoring of the water bodies adjacent to septic systems, wells, and campsites. The project does not currently consider any of the expected tourism development coming to Camden County, such



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as Cumberland Inlet, nor the proposed Fernandina Beach cruise ships. Additionally, climate change and sea level rise is not addressed in enough detail to gain a full understanding on how new infrastructure proposed in The Plan may be impacted by rising waters.

1. Recreational Boater Visitation, Monitoring, and Enforcement

The NPS is proposing to designate a 1,900-foot-wide visitor access, boat landing, and anchoring area along South End Beach.¹ Having a designated and managed visitor use area would be beneficial to regulate how private boats are accessing the island, but the location and size of this site is in flux. The Plan states that the area “could shift from year to year depending on coastline conditions”² indicating that any signage and delineation markers would also need to be adjusted accordingly. There seems to be no consideration for the area size based on seasonal activity along the shoreline for nesting birds and sea turtles.

The Visitor Capacity Summary states that “60 PAOT (people at one time) in the open portion of South End Beach (the visitor capacity for the closed area to the west of the beach access area is 0 PAOT)”.³ During the November 17th, 2022, Stakeholder Meeting, it was mentioned that in 2019 there were 2,308 private boaters counted and 560 people visited during the month of May.⁴ Figure B-6 of The Plan shows Observations of use levels on weekends and Holidays at South End Beach in 2019. Using remote cameras, the Park collected data to count the total number of people on the beach as well as other data of interest such as dogs and boats. On Memorial Day weekend (May 25, 2019), 225 people were observed on the beach at one time while on the 4th of July weekend there were 418 people observed. The average number of visitors at South End Beach in 2019 on weekends and holidays was 72. Visitors to South End Beach are spread out across the one mile that is currently open to public access.⁵

The Plan does not mention a limit to the number of private boats that can access the island or how many boats would be allowed at South End Beach at one time. Within The Plan, new paths, campgrounds, and access points are proposed, but there is no mention of how many Rangers or Law Enforcement would be added to monitor and enforce the visitor capacity numbers laid out in The Plan, especially visitors accessing the island at South End Beach via private boat. It is encouraging to know that dogs will be prohibited at South End Beach to prevent disturbing any nesting shorebirds and turtles; however, enforcement will be required.

¹ The Plan at 113

² The Plan at 32

³ The Plan at 25

⁴ Sarah Bodo, Project Manager for NPS. November 17, 2022 Virtual Stakeholder Meeting

⁵ The Plan at 111



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Riverkeeper encourages recreational use of our waterways so that residents and visitors experience the beauty of the St. Marys River, while also being an advocate for river friendly practices and manageable visitation in more sensitive ecosystems. With more access comes increased visitation, which can be a force multiplier for damaging and irreversible impacts. Without proper enforcement, increased accessibility to Cumberland Island may harm the ecological integrity for species that nest on the island, which coincides with peak visitation months.

2. Water Quality Impacts

Bacteria

One of Riverkeeper's flagship programs is our water quality monitoring. We are focused on identifying sources of nonpoint-source pollution in our watershed through a dedicated citizen science water quality monitoring effort. Using Georgia Adopt-a-Stream's monitoring protocols for chemical and bacterial sampling, our team of trained staff and volunteers monitor over 50 sites, including several public access sites in the City of St. Marys and Fernandina Beach every month to build an extensive water quality database. This tool is used to report on the overall health of the St. Marys River watershed and help communities apply for funding to remediate failing septic systems. All the data we collect is available on Riverkeeper's website⁶, Georgia Adopt-a-Stream⁷, and Swim Guide⁸ so people can quickly check the water quality of where they are boating or swimming.

⁶ St. Marys Riverkeeper, Inc. <https://www.stmarysriverkeeper.org/>

⁷ Georgia Adopt-A-Stream: Volunteer Water Quality Monitoring. <https://adoptastream.georgia.gov/>

⁸ Swim Guide. <https://www.theswimguide.org/>



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Enterococci and *Escherichia coli*, *E. coli*, are bacteria that live in the intestinal tracts of warm-blooded animals, including humans, and are good indicators of the presence of fecal waste in a waterbody. *E. Coli* is used to identify fecal contamination in freshwater while *Enterococci* is used in more saline waters. “Significant amounts of [bacteria] in a water body can negatively affect the recreational and economic value of the aquatic resource. Overabundance of fecal bacteria in the water can cause beach closures, swimming and boating bans and closures of fishing and shellfishing areas”.⁹ U.S. Environmental Protection Agency (USEPA) recommended standard for *Enterococci* in marine recreational waters is a geometric mean of 35 Colony Forming Units (CFU)/100ml. This geometric mean standard is based on 19 gastrointestinal illnesses per 1,000 swimmers at marine beaches. USEPA recommended *E. coli* level standard is based on 8 people out of 1,000 might get sick and is 126 CFU/100mL.¹⁰

In 2018, the NPS released a Natural Resource Condition Assessment for Cumberland Island National Seashore which included water quality studies with U.S. Geological Survey and NPS from April 1999 to March 2000. Both ground and surface water sources were sampled for parameters that included pH, Dissolved Oxygen (DO), and nutrients, but bacteria ended up not being studied even though there were serious concerns of bacterial contamination due to frequent wildlife use.¹¹ Currently, there is insufficient water quality testing in common visitor access areas, wilderness, and potential wilderness areas, and the existing communication strategy from NPS management is not timely:

Water Quality Incident #1: Between January 1, 2022, and March 31, 2022, NPS did not complete all monitoring or testing for Total Coliform for the Nightingale Water System located at Sea Camp and therefore could not be sure of the quality of the drinking water during that time.¹² After the infraction, all testing requirements were brought back up to speed and results were negative ensuring the drinking water was within safety standards to consume. This notification was distributed on July 21, 2022, four months after the final non-compliance date.

⁹ United States Environmental Protection Agency: What is enterococci? <https://www.epa.gov/national-aquatic-resource-surveys/indicators-enterococci>

¹⁰ United States Environmental Protection Agency: Recreational Water Quality Criteria and Methods. <https://www.epa.gov/wqc/recreational-water-quality-criteria-and-methods>

¹¹ 2018 National Park Service. Natural Resource Condition Assessment: Cumberland Island National Seashore. <https://irma.nps.gov/DataStore/Reference/Profile/2257083>

¹² Google Photos image of water quality violation notification in 2022. shorturl.at/belsT



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Water Quality Incident #2: On May 27, 2022, Riverkeeper received multiple calls from concerned citizens about sogging ground and a foul smell behind Sea Camp. Riverkeeper was able to go out and take samples offshore to test for any possible bacterial contamination; however, we were only able to sample for *E. coli* even though Enterococci would have been preferred. Results from all samples collected were 0 CFU/100mL. A follow up call to NPS to inquire about the complaint found that the septic systems were being inspected and that inspections happen twice a year. But the ground was still reported to be visibly soggy in early November.

The proposed increased number of people accessing Cumberland Island daily (via ferry or by private boat) and at overnight campsites will impact the water quality of the freshwater systems and surrounding bays, estuaries, and ocean if not properly maintained and monitored. It is recommended that both types of fecal coliform bacteria are tested frequently near septic systems as well as water bodies and wells adjacent to campgrounds to monitor the health of the inland and shoreline waters. Results should be posted in a timely manner on Cumberland Island, the Ferry, mainland location, social media, and website to ensure public awareness and NPS transparency. Riverkeeper offers its assistance to help train and equip Park Rangers with the resources needed to run water quality tests on Cumberland Island and report findings to the public.

It is strongly recommended that current septic systems on the island be evaluated and upgraded to accommodate the increased number of visitors. With the projected number of people visiting the island, how often does the NPS believe they will require pump out service? Is this contracted out to a private business or does the NPS pump out their own tanks?

A new trail segment will connect the beach to the Nightingale Trail which will include restrooms and outdoor showers. A 1,200 square foot septic leach field will be installed, but the location has not been determined. Is the thought that this new facility will help offset the use of the current septic systems so no septic systems will need to be replaced?

Freshwater

The “primitive, undeveloped character” of Cumberland Island is a draw for many who seek to escape the hustle and bustle of the world and secluded camping opportunities is a draw to many outdoor adventurers. “The NPS is required to preserve the qualities of wilderness character”¹³ as made clear by Congress when Cumberland Island was established as a National Seashore in 1972:

¹³ The Plan at 10



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[W]ith the exception of areas deemed especially adaptable for recreational uses, the seashore shall be permanently preserved in its primitive state, and no development for the convenience of visitors shall be undertaken that would be incompatible with the preservation of the prevailing unique flora and fauna or the physiographic conditions.¹⁴

In addition to the proposed 700 visitors by Ferry to Cumberland Island, under Alternative 2 Proposed Action and Proposed Alternative, reserved camping permits will increase at Sea Camp Campground and Backcountry Camping. Sea Camp will go from 112 people to 130 people in the front country campground. Backcountry Camping at Stafford Beach Campground will remain the same at 36 campers while two new camping opportunities will be available at Beach Creek and Hunt Camp resulting in a max of 72 camping permits which doubles the current number of campers at one time.¹⁵

The surficial and Upper Floridan aquifers on Cumberland Island are the primary sources of drinking water for residents, park employees, and visitors and are recharged by infiltration of rainfall and seepage from wetlands. Unconfined portions of the surficial aquifer are important for sustaining freshwater wetland ecosystems on Cumberland Island.¹⁶ The Plan will significantly affect limited freshwater resources on Cumberland Island. Impacts to freshwater resources have not been properly evaluated in the Plan or Environmental Assessment. Increased visitation, development, infrastructure, and increases in waste and withdrawal will have significant impacts to water quality and availability, especially for wildlife.

Cumberland Island National Seashore and Wilderness has the greatest diversity of habitats and biotic communities of any barrier island. The limiting resource for many of these species and communities is freshwater. The island supports freshwater lakes, ponds, and sloughs with highly fluctuating water levels.

¹⁴Act of Oct. 23, 1972, Pub. L. No. 92-536, 86 Stat. 1066 (1972) (establishing the Cumberland Island National Seashore).

¹⁵ The Plan at 30

¹⁶ Frick, E. M. Brian Gregory, Daniel L. Calhoun, and Evelyn H. Hopkins. 2022. Water Quality and Aquatic Communities of Upland Wetlands, Cumberland Island National Seashore, Georgia, April 1999 to July 2000. United States Geological Survey. <https://pubs.usgs.gov/wri/wri02-4082/pdf/wrir02-4082.pdf>



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3. Climate Change and Sea Level Rise

The Climate Change and Sea Level Rise section of The Plan is only one page long and does not provide significant insight into how Cumberland Island may be impacted by 3 ft or 5 ft sea level rise or the increased frequency of strong storms as a result of climate change. Flood zones have been identified in The Plan; however, has the long-term sea-level rise been considered in developing along any waterbody or wetland? As a barrier island, it is more vulnerable to hazards and detrimental impacts including saltwater intrusion in freshwater systems, erosion, habitat destruction, trail maintenance, and structural damage. It is discouraging to see public docking prohibited for months at a time due to damage. Currently public docking on the island at Sea Camp and Dungeness is prohibited until repairs are made. This notification was made public on October 19 and updated on November 12, 2022, but the dock is still closed.¹⁷

There is no mention of the Camden County Resiliency Implementation Workplan¹⁸ that was published in May of 2022 that includes steps to improve resiliency and prioritize a list of specific, actionable projects that would address flooding, coastal erosion, sea level rise impacts, and associated risks for the County as a whole. NPS at Cumberland Island Seashore is listed as a Partner to help create and implement this workplan however it is not mentioned in The Plan.

4. Population Growth in Gateway Communities

Cumberland Inlet

Cumberland Inlet¹⁹ is a 722-acre development project in downtown St. Marys along the North River. This is the site of the old Gilman Paper Plant and contains brownfield sites from the hazardous material buried there during operations of the plant. The master-plan developer, Jim Jacoby, is leading the project along with Camden County Joint Development Authority. Mr. Jacoby is respected for his development project, Atlantic Station in Atlanta. The Cumberland Inlet development will include a 10-acre marina, vacation rentals, build-to-rent, camping park, and a town center.

¹⁷ National Park Service. Cumberland Island National Seashore, Georgia. Alerts & Conditions.

<https://www.nps.gov/cuis/planyourvisit/conditions.htm>

¹⁸ Camden County Resiliency Implementation Workplan. 2022.

<https://drive.google.com/file/d/1JcgVZVPO8ATNzufeYR63JGTXCv5C7qsZ/view>

¹⁹ Cumberland Inlet Master Plan proposed March 24, 2022.

https://drive.google.com/file/d/1dYM30Lq1wQKLdKsAwAbGLqMGY59XFiYg/view?usp=share_link



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1. Vacation Rentals, Build-to-Rent, and Eco-tourism Parks

Cumberland Inlet is proposing a Vacation Rental District which will cover roughly 31 acres and comprise 874 units. The Build-to-Rent is roughly 14 acres and has the capacity to build 162 units. The Vacation Rental District and the Build-to-Rent are designed to be short-term, providing more opportunities for people to come visit St. Marys on a yearly basis. The proposed parking count is close to 3,000 parking spots. In addition, an Eco-tourism Park (71 acres) and a place for Yurts, Cottages, and Cabins (26 acres with 30 units) is proposed for the north end of the master plan. Many of these non-residents will visit Cumberland Island as day-trippers.

2. Marina

A 10-acre boat basin has been proposed in the uplands adjacent to the North River. This basin will include roughly 115 wet slip docks and 304 dry slips.²⁰ It is expected that the marina will reach 95% capacity within the first few months of opening as there is a need along the east coast for more docks. Both fuel and a sewage pump out will be available on site. Easy access from the Ocean and Intercoastal Waterway will entice more private boaters to explore the St. Marys River and dock for multiple nights to explore the region. This will increase the number of people that will travel to Cumberland Island in private boats.

Raydient Development off Exit 1

Raydient is the taxable subsidiary of Rayonier, a leading timberland real estate investment trust with assets located in some of the most productive timber growing regions in the U.S. and New Zealand. Raydient is in process of getting its annexation and zoning approval by the City of St. Marys to build a nearly 1800-acre development with industrial space, mixed use area, and a commerce park off Exit 1 in Georgia. This is a public/private collaboration that has a timeline of 20 years for completion. The Master Plan states that St. Marys could expect to have another 5,000 to 11,000 residents by 2050 based on population projections by the Georgia Governor's Office of Planning and Budget (OPB). This proposed development could add 3,000 homes with a population of approximately 8,040.²¹

²⁰ Georgia Department of Natural Resources, Coastal Resources Division. Camden County Joint Development Authority, Modification of a Commercial Marina Facility Wharf at St. Marys, North River, Camden County, Georgia. <https://coastalgadnr.org/camden-county-joint-development-authority-modification-commercial-marina-facility-wharf-st-marys>

²¹ Raydient St. Marys Annexation Petition and Application for Rezoning. 2022, page 16.



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Fernandina Beach Cruise Ship

On November 27, 2022, Fernandina Beach News Leader, a local newspaper, reported that there are two cruise lines that have expressed interest in docking at the Port of Fernandina Beach, one in April and the other in May of 2023.²² Oceania is advertising Fernandina Beach, FL as a new port for their 2024-2025 voyages and the cruise line carries 1,200 passengers²³ while The Seven Seas Voyager carries 680 passengers and is advertising arrival to Fernandina Beach in May 2023 on their Miami to Montreal Spring Voyage.²⁴

The Port of Fernandina Beach's Draft Master Plan does mention the potential cruise port of call stating "though not currently in full operation, there have been considerations for the development of a cruise port of call which would provide access to the Fernandina Beach area. If implemented, this service would likely be provided within or adjacent to the Port facility, requiring further coordination".²⁵ At the October 18, 2022 City of Fernandina Beach Commission meeting, the Commissioners voted that a super majority vote be required for any proposed expansion of the port into the historic district.²⁶ Although a port expansion would need City Commission approval, under FL SB 1194 (2021) Transportation Bill, Florida ports "may not restrict maritime commerce" and "local ballot initiative or referendum may not restrict ships based on vessel type, size, number, or capacity".²⁷

It is unclear whether shore excursions to Cumberland Island will be offered to cruise passengers. However, with a proposed ferry service connecting St. Marys, GA and Fernandina Beach, FL and the proposed expansion of concessionaires and commercial use offerings found in Alternative 2, the accessibility and comfort of the visitors could quickly outcompete the protection of Cumberland Island's sensitive ecosystem.

²² Fernandina Beach News Leader. *Cruise Ships scheduled for the Port of Fernandina without knowledge by OPHA*. November 23, 2022.

https://drive.google.com/file/d/1h232K_OinJd3Tod4bJoIjMV54heJ8cRe/view

²³ Travel Pulse. *Oceania Cruises Introduces 2024-2025 Tropics & Exotics Voyages*. October 31, 2022.

<https://www.travelpulse.com/news/cruise/oceania-cruises-introduces-2024-2025-tropics-exotics-voyages.html>

²⁴ Cruisedig. *Seven Seas Navigator Itineraries*. <https://cruisedig.com/ships/seven-seas-navigator>

²⁵ OHPA Port of Fernandina Strategic Master Plan Update Draft. November 2022. Page 51

<https://drive.google.com/file/d/1f0IjcGJ2WRAGMTJwIiAOVnGNQjux4XL/view>

²⁶ City Commission of the City of Fernandina Beach, Florida. [Resolution 2022-188](#).

²⁷ Royal Caribbean Blog. Florida Governor signs bill to overrule Key West cruise ship ban. FL SB 1194 (2021). <https://www.royalcaribbeanblog.com/2021/06/30/florida-governor-signs-bill-overrule-key-west-cruise-ship-ban>



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Conclusion

St. Marys Riverkeeper appreciates the National Park Service for developing a Visitor Use Management Plan for Cumberland Island National Seashore and Wilderness and offers its assistance in any way they feel is beneficial. Cumberland Island National Seashore is the culmination of a 130-mile journey down the St. Marys River. The St. Marys River possesses excellent water quality, outstanding natural habitats, diverse wildlife, and incredible, but untapped, recreational value.

Riverkeeper is encouraging NPS to adopt the following suggested strategies to protect Cumberland Island from recreational pressures that can lead to degradation and irreversible impacts due to tourism development in the surrounding gateway communities:

1. **Outline a Strategic Plan for implementation.** During the November 17, 2022, Stakeholder Meeting, no set priorities were discussed nor how long the plan would take to fully implement once adopted. A timeline of events would be beneficial to indicate project priorities and which funds and grants would be initially sought.
2. **Enforce a daily visitor threshold that includes restricting private, recreational visitors.** Limiting the number of people who can access the island daily, will ensure public safety as well as maintain the wilderness character that many who come to Cumberland Island are looking for. The proposed plan touts research that visitors experience “low to moderately low” levels of crowding at key destination sites²⁸ this experience exists and is consistent *because* of the controlled access points and visitor restrictions employed by management at the time of research.
3. **Adopt a Visitor Impact Management Strategy.** Some of the following items to minimize recreation impacts have been laid out in The Plan, but the details of how these will be administered or evaluated in their effectiveness for preserving the Island's ecosystem are unclear. NPS can minimize Cumberland Island's recreational impact by restricting high-impact uses, containing rather than dispersing recreational use, encouraging the use of resistant environments, teaching low-impact recreational practices, and enforcing park rules and regulations.

²⁸ Brownlee, Matthew, Ryan Sharp, Marchel Blacketer, John Nettles, and Elizabeth Perry. 2018-2019. *Evaluation of the relationship between current conditions, travel patterns, visitor thresholds, and ferry services at Cumberland Island National Seashore*. Department of Parks, Recreation, and Tourism Management. Clemson University.



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4. **Actively monitor and report on the water quality of Cumberland Island.** It appears the water quality monitoring is occurring; however, the transparency of the data is not consistent, and when an issue does arrive, notification of any violation occurs months after the incident. With more full-time staff needed to fulfill everything The Plan proposes, a team of water quality testers should be included to ensure that all visitors are aware of the quality of the water they are seeing and know that the water is safe to drink.
5. **Complete an Environmental Impact Statement, EIS.** A full EIS should be done to comply with federal law and for the public to assess the broad scope of changes, and cumulative impacts from this plan.
6. **Adopt a more thorough Resiliency Workplan.** Camden County has invested time, energy, and funds to develop an understanding of the long-term impacts that sea level rise will have on the community today and for the future. Cumberland Island National Seashore is included in this plan and the findings from the workplan should be considered for future infrastructure plans on the island.

The Plan addresses many complex issues in a thoughtful manner and the public has been involved in the decision-making process since this first began. Riverkeeper knows that NPS staff will give considerable thought to the comments provided in this letter and hope that the efforts today will develop a strong foundation for future management decisions at Cumberland Island as well as an example for other National Seashores.

Thank you for the opportunity to comment. Riverkeeper is eager to work with and support the NPS on any Visitor Use Management Plan improvements and water quality testing needs.

See you on the river soon!

A handwritten signature in black ink, appearing to read "Emily Floore".

Emily Floore
Executive Director
St. Marys Riverkeeper