



WILDERNESS WATCH

*Keeping Wilderness Wild*

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National Park Service  
Cumberland Island National Seashore  
101 Wheeler Street  
St. Marys, GA 31558

October 17, 2024

National Park Service,

Thank you for asking for public feedback. The agency should ask these questions, however, before spending any taxpayer money for negotiations on the disposal of public property. The newsletter suggests that negotiations might already be well underway. Please disclose who initiated this land exchange.

While Wilderness Watch supports the agency's efforts to acquire land, we oppose the idea of exchanging any land on Cumberland Island when there exists the authority and means to simply acquire the land still owned in fee simple. Additionally, the lack of details provided makes it difficult to meaningfully engage in the merits of this proposal or identify potentially better alternatives.

A simple acquisition of acres could more fully meet the stated purpose and need than a land exchange. One of the stated needs for the proposal in the public presentation was to "improve manageability of these areas." But, NPS has never completed a wilderness management plan for this Wilderness.<sup>1</sup> The absence of such a plan with goals and strategies for wilderness (and potential wilderness) management would make it difficult to have goals and strategies to "improve manageability" of these same areas. A second stated need for the proposal in the presentation was to "preserve important resources." The agency's ambiguous reference to "conservation easements" that would be tied to the land transferred into private hands, however, suggests that the agency would dispose of important resources. NPS stated that properties considered for acquisition intersect with the Seashore's main road. But, the few details from three of the four exchange proposals also show the agency disposing of land along the main road. In this nascent stage, the land that would be transferred into private hands seems to undermine proposal's purpose.

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<sup>1</sup> "Wilderness" means a designated wilderness area managed by the 1964 Wilderness Act.

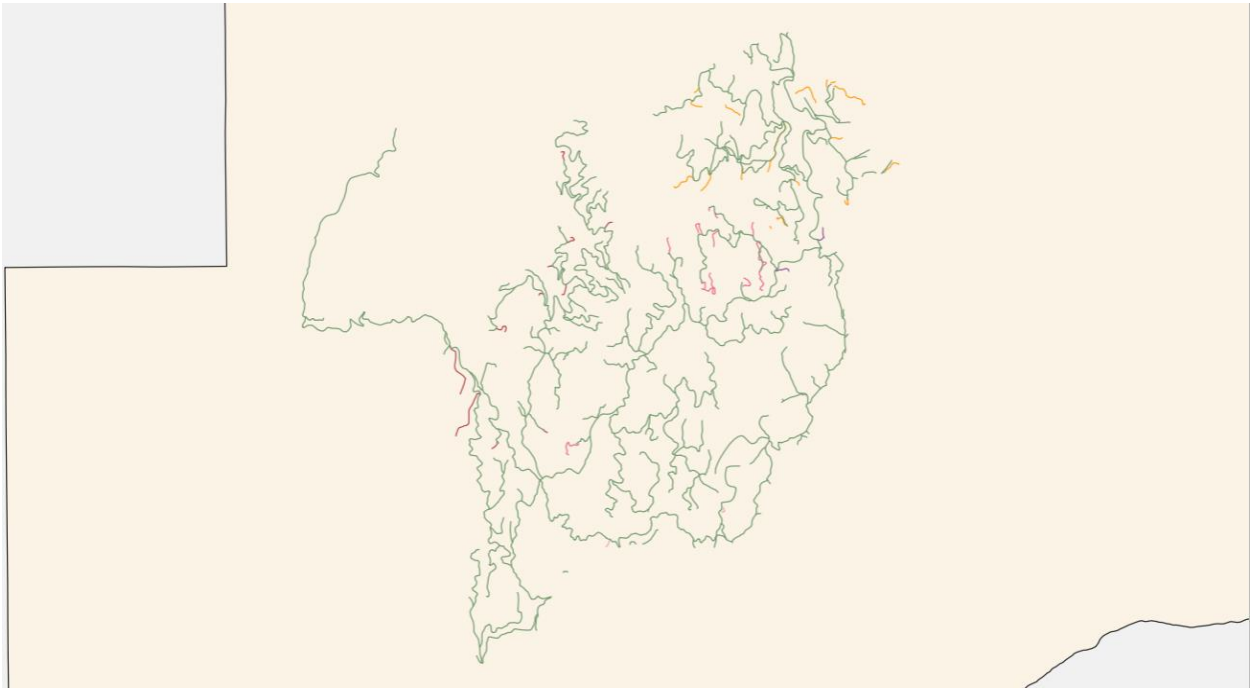
The document is missing the ownership specifics of the properties that NPS is hoping to acquire. There are retained rights on Cumberland Island, where the federal government has already acquired ownership, but private individuals retain rights to occupy it for a period of time set to expire on a specific date. Upon expiration, the property in question would be entirely owned by the public with no right of occupancy for private parties. This information is paramount because the agency must not spend taxpayer money “acquiring” what the public already owns.

Some of these areas will already become Wilderness once the nonconforming uses end, so it is important to confirm this proposal doesn’t seek to “buyout” land and property rights the public already has. For example, in the newsletter under Exchange #1, NPS described the land to be acquired as “currently designated as potential wilderness and would convert to designated wilderness after NPS acquisition.” Congress usually doesn’t designate private property as “potential wilderness.” If this property already is in public ownership with retained rights, its current designation as “potential wilderness” makes sense. But, this also means that NPS would be trading away land the public will completely own after the retained rights expire. For this reason, NPS must clarify and disclose the type of ownership of the land that NPS seeks to acquire before spending more time and taxpayer money on this proposal.

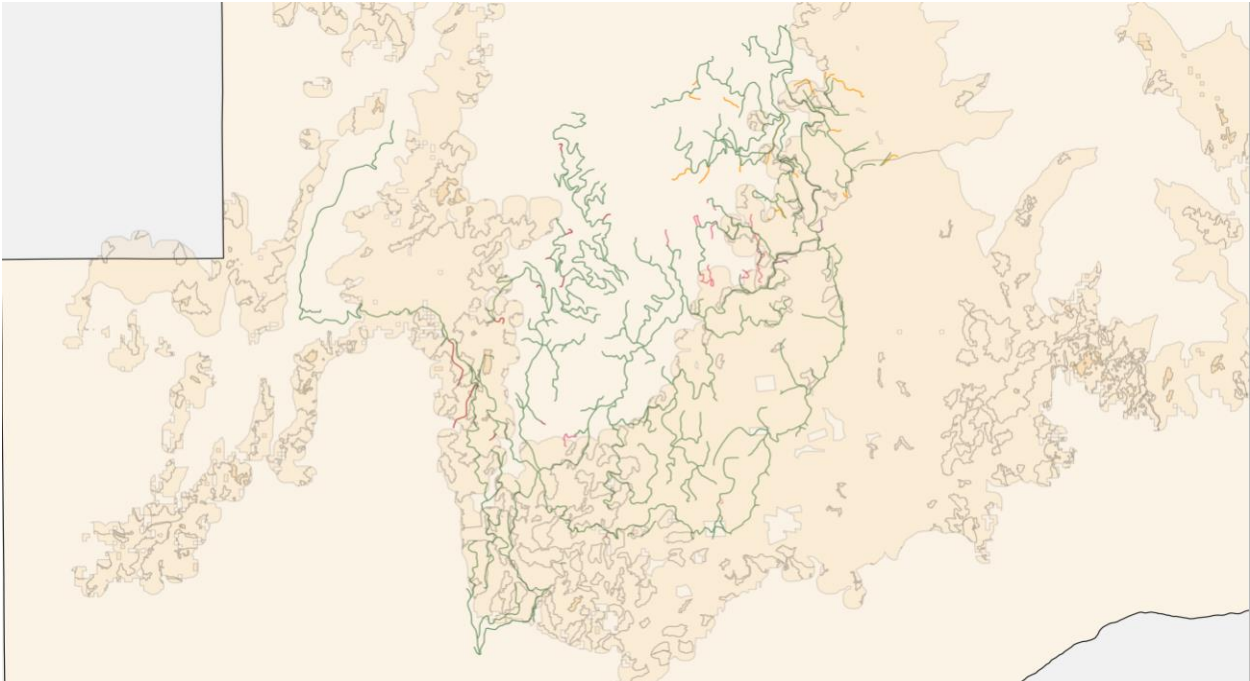
Moreover, NPS is precluded from transferring lands currently designated Wilderness or potential wilderness from federal ownership. The Wilderness and potential wilderness boundaries were established by Congress and only Congress can change them. Transferring any of those lands would effectively change the boundaries of the Wilderness or potential wilderness. NPS does not have authority to do this.

NPS must disclose better maps. The maps provided do not map all that is federal land, potential wilderness, state-owned, privately owned, or utilized by the Department of Defense. Further, the maps do not identify where the conservation easements are needed or proposed for the land identified to transfer into private ownership. If NPS has already identified the potential land to be disposed, the agency should know where those conservation easements would generally be.

Below is an illustration of why maps are important. This is a road layer on a national forest. The green lines are roads where the agency proposed roadwork connected to a logging project. The red lines are the temporary roads proposed for the logging project.



With only knowing the national forest boundaries (land in beige) and the roadwork proposed (this map excludes all existing roads and focuses just on the proposed roadwork), one cannot know the impact to a threatened species like lynx. The below map, however, are the same roads mapped with lynx habitat (darker beige).



This second map provides more context and this context suggests a negative impact to lynx that the first map did not, demonstrating the need for further analysis. Yet this second map still lacks the proposed logging units, scale, and the audience for this map doesn't know if there is a larger region of lynx habitat. Mapping in relation to other things provides important context.

The maps NPS provided are similar to the first map of the ones above. The proposal suggests it would "safeguard[] critical habitat for federally protected species such as sea turtles and nesting shorebirds." But, none of that critical habitat is mapped with the land acquisition or disposal, so the public, and likely NPS, is operating with large gaps in knowledge. Also, even though NPS aims to have connecting corridors, three of the exchanges proposed for disposal border each other, creating a very large, contiguous block of land going into private hands. Yet, NPS did not release a map where all proposed land disposals were mapped next to each other.

NPS should create maps that outline the ownership, maps that show the aggregate of land gained versus land lost, maps with all gained and lost tracts so the public may see their spatial relationships, and maps that contain this information with critical habitat and proposed easements. Beyond that, though, so the public can analyze this proposal, NPS should release the GIS layers the agency has on Cumberland Island so the public might use their information make their own maps.

Finally, this proposal lacks the following pieces of information that would contribute to meaningful public engagement, including whether the agency should pursue this proposal or develop other alternatives.

- Specificity of the conservation easements that are presumably necessary or desirable
- The acres of public land that would be lost, and the net loss (which is what the maps seem to suggest)
- Valuation estimates

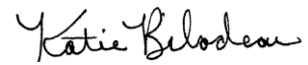
Please disclose the money spent thus far on planning and developing this idea before making the public aware of this proposal.

Please analyze impacts to Wilderness and to potential wilderness.

Much of the public process exists ahead, as this step does not represent the start of what is required under the National Environmental Policy Act. We recommend this become a NEPA proposal where you do not exchange land, but instead study the most strategic acreage of land to acquire and look to sources like the Land and Water Conservation Fund to realize that acquisition. We oppose any land exchange, but if this idea moves forward, we recommend that NPS impose conditions and covenants on the public land it trades away that prevents development of those lands in order to retain the undeveloped character of the island.

We request notice on this proposal moving forward. You may mail that notice to the address in the letterhead, and you may email that notice to [kbilodeau@wildernesswatch.org](mailto:kbilodeau@wildernesswatch.org), [gnickas@wildernesswatch.org](mailto:gnickas@wildernesswatch.org), and [masonp@wildernesswatch.org](mailto:masonp@wildernesswatch.org).

Sincerely,

A handwritten signature in black ink that reads "Katie Bilodeau". The signature is written in a cursive, flowing style.

Katie Bilodeau  
Legislative Director and Policy Analyst  
kbilodeau@wildernesswatch.org

*and for*

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