



Cumberland Island National Seashore

Comments on the Visitor Use Management Plan

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The following comments address fundamental problems in the assertions and procedures applied in preparing the VUMP and in the process for public review, including unaddressed issues critical to the purpose of the plan.

1. The VUMP should be subordinate to, and facilitated by, a plan for wilderness management by NPS, yet such a plan does not yet exist. Since nearly 10,000 acres of Cumberland are already designated as wilderness and an area described as potential wilderness could double that expanse, it is imperative that the management of wilderness takes priority and must precede adoption of visitation guidelines. Without a wilderness management plan, the VUMP cannot credibly, reliably serve the public interest.
2. Terms used in the VUMP lack adequate definition and measurable parameters essential to ensuring that the plan is effective. For instance, means for achieving desired conditions such as “uncrowded setting” lack coherence. Similarly, metrics are inadequate for “maintaining a setting that is consistent with the value of [planning units]” intended to conclusively determine whether objectives are being served or violated.
3. Limitations on daily visitation do not account for the well-documented tendency for higher accumulation of visitors at certain locations, especially during periods of maximum visitation. Critical review of the VUMP narrative suggests that assessment of average daily visitation is susceptible to misleading conclusions about the effects on visitor experience because the aggregation of visitors during daily activities is not accounted for.
4. There appears to be no evidence that demand for visitation is on a scale that the VUMP proposes to serve, which could more than double existing daily visitors. Lacking confirmation of unmet demand, if adopted as drafted the VUMP is likely to promote demand beyond levels consistent with management objectives, and also likely to generate excessively disruptive activities – including the use of motorized vehicles – that conflict with the Congressionally established public purpose of CUIS.

There are many other detailed considerations that could serve as the basis for commenting, but there is little reason for providing them because of the fundamental problems outlined above that threaten both visitor experience and the critically important value of living resources of Cumberland Island National Seashore. Until these basic issues are resolved, the VUMP is premature and thus inherently deficient.