



United States Department of the Interior



NATIONAL PARK SERVICE
Cumberland Island National Seashore
101 Wheeler Street
Saint Marys, Georgia 31558

IN REPLY REFER TO:
4.A (D3219 CUIS)

September 19, 2024

Paul Tobler
Georgia Department of Natural Resources
One Conservation Way
Brunswick, Georgia 31520
via email: paul.tobler@dnr.ga.gov

Re: Coastal Marshlands Protection Committee/National Park Service (NPS) Construction and Maintenance of a Bank Stabilization Project, Plum Orchard, Brickhill River, Cumberland Island, Camden County Georgia

Dear Mr. Tobler,

Thank you for the public comments regarding Cumberland Island National Seashore's bank stabilization project at Plum Orchard National Historic District, located along the Brickhill River. Here is our response to the concerns raised during public comment.

There were concerns regarding impacts to emergency services and public access.

The Plum Orchard dock will be closed to all services during the construction period with the exception of NPS escorted loading and unloading of hunters for the public hunts and special event "Christmas at Plum Orchard" attendees. These dates are:

- November 4th
- November 8th
- December 2nd
- December 6th
- December 7th
- December 20th
- December 23th
- January 6th
- January 10th

Recreational boaters and kayakers will still be able to navigate the Brickhill River but will need to avoid the construction zone. This shoreline work will not permanently affect recreational boating and kayaking. Regarding concerns for emergency services, there are two public docks (Dungeness and Sea Camp) further south that are the primary docks used for emergency services. Emergency first responders will determine appropriate evacuation measures situationally.

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There was a discrepancy regarding the construction schedule.

The construction schedule has been updated to November 4, 2024 through February 7, 2025.

There were concerns regarding impacts to wildlife.

Please see the attached letter from Fish and Wildlife regarding the concerns for marine ecosystems and wildlife. The letter concludes with the following statement: "Based on the information provided and available, the proposed action is not expected to significantly impact fish and wildlife resources under the jurisdiction of the U.S. Fish and Wildlife Service."

There were concerns regarding Wilderness and impacts to vegetation.

Per Public Law 108-447 that includes the Cumberland Island National Seashore Wilderness boundary update, the Plum Orchard Road and the entire proposed project area is not in designated Wilderness. After consultation with the Southeast Coastal Network Vegetation Ecologist, the proposed collection of Wax Myrtle would occur outside of the designated Wilderness and likely on the South End near the Dungeness Beach Crossing. There will be no elimination of vegetation north of the rip rap. Some or all of the dead trees that have eroded from the shoreline will be removed so that vegetation and rip rap can be placed.

We currently manage the Plum Orchard Historic District landscape in accordance with the Plum Orchard Cultural Landscape Report (2014), to include mowing along the shoreline and maintaining the Plum Orchard Road. Alternatives to managing the landscape in consultation with the Georgia State Historic Preservation Officer are being considered. Stabilizing the shoreline is a benefit for the landscape and the long-term protection of the historic district, the shoreline, and salt marsh ecosystem. The park is working with Georgia Department of Natural Resources on boating speed regulations, enforcement, and public messaging.

We appreciate the feedback and advocacy for Cumberland Island.

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TRENCHIK**

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Date: 2024.09.19
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Melissa R. Trenchik
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