

The Park Service deserves our support for opening The Grange to the public, but the rest of the retained estate management plan needs a closer look.

While housing for essential Park Service personnel at Davisville is logical and mentioned in the General Management Plan, many structures outside that area have come to be used as housing for discretionary personnel or those peripherally associated with the park. There are presently two dormitories which can house over 30 people, "staff quarters" with 3 large bedrooms, 5 houses (3 with more than 1 bedroom), and 4 separate apartments, which together could hold over 60 people, conservatively 50. How many people does the Park Service envision being able to simultaneously accommodate overnight on the island? The GMP directs that the number of staff living on the island be restricted to the number needed for "operational effectiveness and capability of immediate response to emergencies." At the present time that number is 5.

Given the guidelines established by the enabling legislation, including the ceiling on daily visitation numbers, planning housing for concession employees, technical assistants, cooperators, volunteers, SCA people, and anyone else someone considers a benefit to the park in addition to essential personnel, as suggested in the Plan, needs close scrutiny. It can be safely assumed that the more housing space available, the more overnight people there will be. This has been a perennial problem in this park and is not in keeping with reducing the human impact and maintaining a "primitive state."

Maintaining an NPS community at Davisville, while suitably out of the public eye, may have a negative impact on the surrounding gopher tortoise colony, a Threatened species. Landowners visited only periodically, whereas full-time residents or even semi-full time people, will have an effect on these animals which needs to be acknowledged in the EA, instead of being "dismissed." There have been road fatalities.

Keeping the Stafford Beach House as yet another overnight accommodation place needs justification. The EA section on "Historic Structures" provides no insight to its historical significance, and no one can seem to (or is willing to) provide a date of construction. I have requested that information several times. Increased activities there affect the ambiance at the near-by Stafford campground and beach.

Respectfully,

Wild Cumberland

The Cumberland Island Chapter of Wilderness Watch