

The Honorable Earl L. Buddy” Carter
First District of Georgia, U.S. House of Representatives

Dear Representative Carter,

I have lived in Camden County – off and on – since 1979. As a citizen and retired Naval Officer, I urge you to actively support the National Park Service (NPS) to take necessary actions that will preclude commercial and residential development on Cumberland Island – anywhere in and adjacent to the *Cumberland Island National Seashore*.

Currently, distant owners of 87.5 acres of private property are requesting local authorities for variances and other changes that will allow residential development. This property is within the boundary of the Cumberland Island National Seashore and immediately adjacent to “Sea Camp” – a secluded and most unique camp site with international acclaim.

Some say this is a “local issue”. This is correct regarding “zoning” and local “codes”. However, this island is the crown jewel of Georgia’s coastal barrier islands. In addition, as the name of the seashore suggests, this is a National resource, with international visibility and tens of thousands of annual visitors and campers from throughout the Country and the world.

With the assistance of others and referencing relevant studies and directives, I have attached information that, hopefully, will convince you that this is a subject of National importance that deserves and requires your intervention and support to protect the “...primitive, undeveloped character of one of the largest and most ecologically diverse barrier islands on the Atlantic coast. ...”

In advance, thank you for your consideration and support. Please feel free to contact me if you would like to discuss this issue further

Sincerely,



Tom Canning
410 Point Peter Place
St. Marys, Georgia
912-576-4933
tcanning@tds.net

Sea Camp Photos



PUBLIC LAW 92-536-OCT. 23, 1972: “Except for certain portions of the Seashore deemed to be especially adaptable for recreational uses ...the Seashore shall be permanently preserved in its primitive state. ...”

https://www.nps.gov/cuis/learn/management/upload/sal92-536_enab-leg.pdf

The purpose statement for Cumberland Island Nation Seashore is: “Cumberland Island National Seashore maintains the primitive, undeveloped character of one of the largest and most ecologically diverse barrier islands on the Atlantic coast, while preserving scenic, scientific, and historical values and providing outstanding opportunities for outdoor recreation and solitude.”

Fundamental Resources and Values



(Foundation Document Cumberland Island National Seashore Georgia February 2014)

https://www.nps.gov/cuis/learn/management/upload/CUIS_FD_FINAL.pdf

Fundamental resources and values (FRVs) are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes determined to warrant primary consideration during planning and management processes because they are essential to achieving the purpose of the park and maintaining its significance. **Fundamental resources and values are closely related to a park's legislative purpose and are more specific than significance statements.**



Fundamental resources and values help focus planning and management efforts on what is truly significant about the park. One of the most important responsibilities of NPS managers is to ensure the conservation and public enjoyment of those qualities that are essential (fundamental) to achieving the purpose of the park and maintaining its significance. **If fundamental resources and values are allowed to deteriorate, the park purpose and/or significance could be jeopardized.**

The following fundamental resources and values have been identified for Cumberland Island National Seashore:



National register archeological districts and other significant archeological resources. ... There are other archeological resources on the island that reflect its 4,000 years of human culture and reveal stories that include American Indian life, Spanish missions, colonial fortresses, agricultural plantations, military occupation, enslaved Africans, vacation retreats, African American communities, remote lifestyles, maritime endeavors, and grand estates. **Some of these sites are listed in the national register** as features of the island's historic districts.

National register historic districts and their contributing features. Cumberland Island National Seashore's four national register historic districts—Dungeness, Stafford Plantation, Plum Orchard, and High Point-Half Moon Bluff—highlight the cultural landscapes, historic structures, artifact collections, archeological sites, and other **features associated with their respective historic and prehistoric cultures. They are significant with respect to archeology, architecture, community planning, agriculture, landscape architecture, leisure/resorts, religion, and/or social/humanitarian history.**



Intact barrier island system driven by coastal geological and biological processes. Cumberland Island National Seashore is largely undeveloped and, although it had been affected by human endeavors in the past, natural forces now prevail. The length and breadth of the island allow numerous diverse habitats to prosper, which in turn give critical refuge to a magnificent variety of plant and animal species. **This rich environment and natural character make Cumberland Island unique among coastal barrier islands.**



Live oak maritime forests. The oak maritime forest is dominated by the live oak *Quercus virginiana* and the sprawling, arching trees are enhanced by Spanish moss, ferns, mosses, and a thick palmetto understory. This distinctive forest community has an aesthetic charm that many visitors associate with Cumberland Island. It also provides excellent habitat for a variety of plant and animal species.



Pristine beach (scenic). The pristine beach is of great importance to Cumberland Island as a national seashore and is exceptional because public access to undeveloped, uncrowded, pristine beaches is increasingly rare. **There are very few areas in the United States where beaches remain undeveloped; with more than half of the nation's population living near coastal areas, it is vital to preserve such a cherished yet vulnerable resource.**

Wilderness. Taking into account both designated and potential wilderness, the Cumberland Island Wilderness encompasses more than half of the island's land mass and is exceptionally large for a barrier island. Its deep, lush forest and untamed atmosphere offer outstanding opportunities for solitude and inspired recreation. **Low visitation helps maintain these qualities.**



Primitive and undeveloped character. The legislation establishing Cumberland Island National Seashore mandates that, with 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. In keeping with this directive, development within the national seashore has been minimal since establishment and natural processes have been allowed to dominate.

An uncrowded setting that provides opportunities for both passive and active outdoor recreation. **The uncrowded setting is important because it allows visitors to have opportunities for passive and active recreation. The absence of crowds and overwhelming**



development provides opportunities for solitude and exploration. The island's beaches, flora, fauna, trails, and surrounding waters, as well its cultural sites, present opportunities for a broad array of interests and recreational pursuits.

Background and Fact Sheet follows.



- Lumar LLC purchased this 87.51 acre property in 1998 for \$3.5 million. The parcel is an inholding, held in fee simple, within the boundary of the Cumberland Island National Seashore. There are roughly 1,000 acres of private property held in fee simple within the NPS boundaries on the island.
- The Lumar property is directly north of the NPS Sea Camp campground. It runs the width of the island (from marsh to beach) and is bisected by the Main Road and the Parallel Trail. The owners have indicated that they intend to build 10-12 houses on the property.
- Camden County exempted Cumberland Island from zoning by county ordinance from 1992-2002. In 2009, the parcel was assigned “Conservation Preservation” zoning. CP does not allow single family dwellings, but does allow uses such as nature parks, wildlife sanctuaries, marinas, hotels and motels, museums, cemeteries, churches, etc.
- Lumar seeks to subdivide the property for development. In order to do so, they will need a rezoning. As a first step toward rezoning, Lumar has sought a hardship variance to subdivide the property into a 10-lot split, although the lot does not front a paved road as the Camden zoning ordinance requires. There are no paved roads on the island and the Main Road is in the National Register of Historic Places. The Camden County Planning Commission granted this variance on Dec. 7, 2016.
- SELC represents National Parks Conservation Association and St. Marys EarthKeepers in the appeal of the hardship variance before the Camden County Board of Commissioners. The hearing for that appeal has been delay several times, currently until October 2017.

- The County's current approach is to rezone all of the remaining 1,000 acres of inholdings. This would assuredly lead to more development on this wild island. The County has suggested incorporating a density maximum into the rezoning that would permit 1 house per 10 acres. This scheme would allow approximately 70 additional houses to be built on the island. If the county permits a maximum density of 1 house per 5 acres, potentially 149 new houses would be permitted. If the County permits the density allowed under the Agricultural Forestry zoning classification (1 house per 3 acres) which is currently in place on other parcels on the island, this would allow 263 houses.
- This level of development is unacceptable and would ravage the crown jewel of Georgia's coastal barrier islands. Indeed, the Act that established the national seashore provided that “Except for certain portions of the Seashore deemed to be especially adaptable for recreational uses . . . the Seashore shall be permanently preserved in its primitive state.”
- NPS intervention would prevent this development. If provided the authorization, NPS can exercise eminent domain over the Lumar parcel. NPS acquisition of all remaining private parcels in fee has always been the ultimate goal of the Seashore, in order to carry out NPS' management responsibilities.
- NPS could exercise eminent domain using funds that are privately raised. But in order to do so, NPS requires Congressional approval. The Georgia delegation (Buddy Carter, and Senators Isakson and Perdue) must be willing to approach the House and Senate Natural Resources Committees, as well as the House and Senate Appropriations Committees to request this action.