TOWN OF CHINCOTEAGUE, INC.

September 9, 2011

Patricia Kicklighter, Superintendent
Assateague Island National Seashore
7206 National Seashore Lane
Berlin, MD 21811

RE: Assateague Island National Seashore
General Management Plan Alternative Concepts

Dear Ms. Kicklighter:

On behalf of the Town of Chincoteague and the Chincoteague to Assateague Beach Access Advisory Committee, I am presenting a brief list of comments and concerns regarding the General Management Plan (GMP) Alternative Concepts for the Assateague Island National Seashore that are included in your Summer 2011 Newsletter #2.

After waiting for 2 years since your last newsletter, we learned about new ideas and new policies for the first time in your open house presentation and have only been provided a limited window of time for community participation. The alternatives planning process is frustrating because there are very good ideas mixed with very bad ideas from our perspective as the gateway community for the southern end of Assateague Island. The following list is provided to clearly identify those elements of the draft GMP that we hope the NPS will work on in more detail with the Town of Chincoteague representatives.

Strongly Oppose

A. Oppose the current direction of seashore management that favors the use of alternative transportation systems and treats the idea as a Fundamental Value.
B. Oppose the concept of a Marine Research Reserve until more information is provided. Specifically, the intended use for research and environmental education that would restrict public or commercial use of the Chincoteague Bay.
C. Oppose NPS regulations for 'watch houses' that remove State authority over wastewater treatment and disposal and/or require removal of private structures that serve as a traditional cultural resource.
D. Oppose NPS commercial use permit regulations that restrict access to Assateague Channel.
E. Oppose Natural Resource Management policies that limit or ban commercial fishing and aquaculture within the seashore boundary. Without the managed use of our natural resources by private industry, the NPS would be responsible for dealing a critical blow to a vital portion of the local economy and a traditional lifestyle of the native population.

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F. Oppose the policy that would permanently close areas to OSV use if coastal storms or other natural processes create breaches/inlets that cut off access to portions of the beach. If NPS continues to administer OSV permits for the FWS along Toms Cove in Virginia, this policy would permanently remove public access to the Hook ...forever...as soon as the 'let nature take its course' management approach is effective in breaking through the existing parking areas whether the barrier island heals itself or not.

G. Oppose any options that abandon the public trust and allow existing visitor use facilities and infrastructure, specifically bridge access from the mainland to Assateague Island, to be subjected to natural coastal processes without maintenance, repair or replacement.

H. Oppose the NPS relocation of public access and recreation at the National Seashore in favor of passive management of natural coastal processes and promoting exclusive environmental research uses.

Support

A. Support for the current adaptive management plan that has been successful for the last 20 years.

B. Support for the use of 'management zones' to identify different areas of Assateague Island so that all of the purposes of the National Seashore can be met in different areas.

C. Support for the new management zone concept and the strong emphasis on traditional beach recreation.

D. Support for policies that defend the visitor areas in both Maryland and Virginia.

   a. *"Artificial dune fortification, habitat manipulations, and possible beach nourishment would be used to protect the developed visitor areas from the effects of natural coastal processes and climate change/sea level rise...storm overwash and breaches in the developed visitor areas would be repaired, while natural evolution of the island's backcountry areas would continue without interference..."*

   This makes sense to protect and actively manage important public use areas and allow natural processes to take their course in other management zones. It should apply to Virginia and should be incorporated into a new interagency agreement.

E. Support for NPS to expand its existing partnership with the U.S. Army Corps of Engineers related to erosion control. This implements the direction provided by Congress in the 1965 Seashore Act, Section 8, which created the Assateague Island National Seashore and requires the Secretary of the Interior to cooperate with the Secretary of the Army in the study and formulation of plans for beach erosion control and hurricane protection of the seashore.

F. Support for USACE to study dredging or other improvements to maintain tidal flow to the north end of Chincoteague Bay as an active management solution to the reported decline in water quality of the central bay area.

G. Support for Natural Resource Management policy that allows for continued commercial fishing and leasing of submerged lands within the seashore boundary for commercial aquaculture.

H. Support for taking no action related to privately owned structures associated with submerged land leases in Chincoteague Bay within the seashore boundary

I. Support for a policy that recognizes the potential for natural forces to temporarily close OSV access until such time as the beach is naturally restored or restored through active management.

J. Support an OSV policy that would replace area lost to OSV use by opening other portions of the island to over sand vehicles.

K. Support for continued bridge access at both the north and south end of Assateague Island for both public access and emergency services.

Request for more Information

A. Request that the NPS initiate a study with USACE of the Tom's Cove shoreline to determine the best means (including beach nourishment and/or 'land base replenishment') to continue recreational beach use, and protection of the public health and safety for residents of Chincoteague Island from the potential effects of natural hazards that are currently provided by the existing management of Assateague Island.

B. Request that the significant investment in recreational facilities and infrastructure should be listed as a fundamental resource on page 4.

C. Request that recreation and stewardship should be listed first under interpretive themes on page 5 to reflect the traditions of the NPS

D. Request that any communication between NPS and VMRC regarding shellfish leases and commercial fishing to be shared with the Town of Chincoteague.

E. Request a plan for active use of the historic Coast Guard Station.

F. Request NPS support of OSV access to the Coast Guard Station during summer months for programmed activities.

G. Request NPS support for OSV secondary or emergency access to the Wildlife Loop or Beach Road if the Virginia recreational beach area is relocated to the north by FWS.

H. Request preparation of a socio-economic impact study that evaluates each alternative (revised or new policies and programs) with its effect on the Town of Chincoteague as a gateway community.

I. Existing Aquaculture areas in Toms Cove are shown on the map as a single line along the shoreline. There are other aquaculture areas along Assateague Channel that are not currently shown on the map. Please provide more information on why some areas are targeted and others are not.

J. If NPS is the intended manager of a future campground facility in the Town of Chincoteague, please provide more information in the GMP alternatives to describe proposed management actions for the next 20 year planning period.

Thank you for the opportunity to provide comments at this point in the planning process. Our concerns and support are based on review of the Newsletter #2 which only provides general information to make a well informed decision about the alternatives in a short period of time. The Town of Chincoteague will continue to rely on NPS staff to support public recreational beach use, OSV use and shoreline management in Virginia through the interagency agreement with the FWS.

Sincerely,

John H. Tarr
Mayor

cc. Lou Hinds, CNWR
Elected Representatives

"One-fifth of all the people in our Nation live within an easy day's drive of Assateague. And now as the result of your labors--you, the farsighted Members of Congress--these wide sandy beaches will be the people's to enjoy forever."

"What the Good Lord once gave in greatest abundance have now become rare and very precious possessions. Clear water, warm sandy beaches are a nation's real treasure."

"For the rest of this century, the shoreline within reach of the major cities of this country just must be preserved and must be maintained primarily for the recreation of our people."

Lyndon B. Johnson: "Remarks at the Signing of a Bill Establishing the Assateague Island Seashore National Park.," September 21, 1965