

Town of Chincoteague Assateague Beach Access Committee

October 2011



Eight Draft Management
Alternatives for Assateague
Island National Seashore
and Chincoteague National
Wildlife Refuge

The Chincoteague Town Council has approved the recommendation of our Beach Access Committee to submit preliminary response letters about the strategies described in NPS and FWS newsletters. View the Town position on our website: www.chincoteague-va.gov

Thank you to the National Park Service and U.S. Fish & Wildlife Service staff who have dedicated their time and talent over the last year to prepare draft alternative management strategies and to incorporate the ideas of the American people into a master plan for the next 15 years.

"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."

"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

There are serious concerns! We hope the purpose behind reviewing 4 fully developed alternatives for both the General Management Plan and the Comprehensive Conservation Plan is to align the two plans and evaluate which makes the most sense. Revisions to each alternative based on public comment are anticipated. Selection of one or more alternatives as being 'preferred' will occur sometime this year. More detailed work will be presented next summer or fall in the form of a draft Environmental Impact Statement and public comment will be collected again. This is the time to make sure that all alternatives are fairly considered.

"Actions considered but not developed" The FWS newsletter excludes consideration of beach nourishment or other shoreline management techniques needed to compare the cost and benefit of alternative strategies. Wouldn't it make sense to allow for natural surface parking areas at Toms Cove to move with the barrier island over time? Placement of sand on the ocean side or the cove side is a 'natural solution' that deserves full consideration under one or more alternatives. It is required by the Assateague Island National Seashore Act (1965) in Section 8.

### Chincoteague National Wildlife Refuge CCP Alternate A or B

Making the case for a stand in defense of the recreational beach at Toms Cove

Release of the long awaited FWS Alternative B plan occurred on August 22nd. After a thorough review of information presented in the August 2011 Newsletter, consideration of public comment, and tours of the proposed site, the Town of Chincoteague cannot support any alternative at this time other than an improved current management plan for the following reasons:

#### 1. Visitor Experience

The 5 miles of seashore that was set aside from the Refuge for public recreation in 1959 and maintained by the National Park Service for over 40 years is a treasured landscape that is not easily left behind. This promise to America should be extended for another 15 years. North Beach as proposed is a diminished experience that does not compare to the exceptional 360 degree opportunities in Alternative A.

#### 2. Parking

FWS has ignored a specific request for Alternative B to provide a minimum of 961 parking spaces conveniently located to North Beach. The Plan locates parking in a woodland and marsh that is fiercely defended by mosquitoes, too far from the beach, unlikely to be approved for more than 500 spaces, and potentially exposed to the same natural forces that challenge Toms Cove. Against all reason, the concept of transit shuttles from a remote location is forcing unreasonable strategies and planning decisions.

### 3. Chincoteague Ponies

FWS has omitted a commitment to maintain the maximum size of the Pony herd at 150 ponies. Terms and phrases that are used in Alternative B mirror those from Currituck NWR and other Department of Interior battlegrounds that label wild ponies as feral invasive species that must be reduced or eliminated. It is hard to be reassured and depart from the 1992 Master Plan without a future Pony Management Plan.

## 4. Public Safety

The interagency agreement between FWS and NPS provides for the maintenance and repair of the parking areas at Toms Cove. If public recreation is relocated to North Beach, FWS would allow and encourage over wash, breach and inlet creation on Assateague Island as natural forces that would expose the Town of Chincoteague to an additional 4 feet of base flood elevation, storm surge and tidal erosion. This is a public safety issue that is the direct result of a change in federal policy which the Town cannot ignore. Beach erosion control and hurricane protection of the Seashore is required by Public Law 89-195, Section 8. The Town requests the cooperation of the US Army Corps of Engineers and the Secretary of the Interior to study and implement a storm damage reduction plan for Toms Cove.

### 5. Economic Impact

In times of economic constraint, it is generally understood that you should take good care of what you have. Why would the public investment of over \$500,000 in 2010 to rebuild beach parking lots be abandoned...or Beach Road...or the Coast Guard Station...or the NPS visitor center all to be tossed out in favor of spending \$20 to 30 million of taxpayer dollars to construct new roads, parking lots, visitor center and a transit system?

The Town is concerned for our local economy, and the FWS management changes or alternatives that could eliminate jobs, businesses and whole industries on Chincoteague. We oppose the purchase of any property in Chincoteague for a transit/remote parking facility and the federal conversion of productive land within Town limits with its loss of tax revenue, direct competition with private enterprise, and full control of Assateague Channel boat access.

#### 6. Tradition

There are elements of a traditional way of life and family traditions that are quietly being challenged in the proposed alternatives. Plans to remove aquaculture in Toms Cove which supports an entire shellfish industry on Chincoteague, horseback riding on the Seashore, elimination of historic watch houses, criminalization of shoreline access, and lost freedom to independently visit the Refuge by automobile represent a fundamental change in what is unique about this place.

#### 7. People First

In a letter from Congressman Scott Rigell, dated May 27, 2011, the USFWS received a comment that 'public access to the beach' should be added as a Vision and Goal for the CCP. We are surprised that this suggestion was not honored in the published August newsletter of alternatives. For that portion of the National Wildlife Refuge that is located on Assateague Island, we believe that there should be a balance between 'people first' and 'wildlife first'. There is no reason to take away the people's small area of beach at Toms Cove when the habitat needs of managed species are adequately met on the other 14,000 acres of the Refuge, and the other 120,000 acres of the Virginia Coast Reserve.

### 8. Climate Change

The potential for increasing sea level rise to adversely affect the public recreation facilities at Toms Cove has been presented as the main reason to consider a move to North Beach. The recent tours provided by FWS staff illustrated dune erosion and over wash progressing north from the Wildlife Loop to C-dyke and the future need for active shoreline management to protect parking areas even in the new location. An inlet at Toms Cove would further destabilize the south end of Assateague Island requiring protection measures for Alternative B. The change that is required is in the policy that does not allow NPS to maintain and repair Alternative A.

The Town of Chincoteague must choose to support a plan that was originally developed with people in mind and has been a proven success rather than a new concept proposed by a single federal agency (FWS) which largely excludes people from the environment which it manages.



#### Assateague Island National Seashore GMP - Alternate B or C

Making the case for a stand in defense of the recreational beach at Toms Cove

Release of the long awaited NPS General Management Plan Alternatives occurred in August with comments due in 45 days. After a thorough review of information presented in the Summer 2011 Newsletter, consideration of public comment, and attendance at an Open House presentation, the Town of Chincoteague has chosen to support selected ideas and oppose others:

#### 1. Management Zones

The identification of management zones for different areas of Assateague Island is a great idea. This way all of the purposes for the National Seashore can be combined for a variety of uses including the Toms Cove 'assigned area' for recreation.

#### 2. Recreational Use

The Town supports active management strategies that protect the developed visitor areas of the Seashore from storm damage and defend against natural coastal processes. Ideas contained in Alternative #2 should also be applied to recreational facilities in Virginia at Toms Cove.

#### 3. Marine Research Reserve

NPS has introduced a new idea in Alternative #3 that would seek a permanent ban on commercial aquaculture, fishing, boating, farming or any human cultural activity in the vicinity of central Chincoteague Bay and Toms Cove. This must be opposed.

#### 4. Assateague Channel

The combined effort of FWS and NPS to purchase property on Chincoteague Island for remote visitor parking, a shuttle system to the beach and a national campground within Town limits will have the unintended (?) effect of controlling both sides of Assateague Channel and allowing all water access to be restricted by Department of Interior law enforcement. The Town cannot support unconstrained expansion of federal control in the waters surrounding Chincoteague.

#### 5. OSV Access

NPS has introduced the policy 'if vehicular access to the Over Sand Vehicle zone is lost due to natural coastal processes or the effects of climate change and sea level rise, no action would be taken to restore access'...ever. If adopted, this approach would apply to the Toms Cove Hook and would override the assurances given by FWS about seasonal OSV access to the shoreline for surf fishing in Virginia.

#### 6. Interagency Agreement

NPS holds the public trust to stand up for public recreation areas that were set aside from the National Wildlife Refuge by Congress. A public access easement along Beach Road, control of the Toms Cove Area, visitor use center, parking areas and the historic Coast Guard Station must survive the current planning process. The Town has asked to review additional information including the draft Inter Agency Agreement between NPS and FWS to understand what has not been included in the simplified newsletters.