

Cumberland Island's Carrying Capacity

By
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Introduction

Cumberland Island National Seashore is the first unit of the National Park System to limit the total number of people who could visit the park on any given day. For the last 30+ years, this limit has been and remains at 300 people each day. How did this number come into being, how was it justified and is it still justified now? The simple answers are: (1) most – but not all – of the principals involved in the creation of the Seashore wanted limited development; (2) the number 300 was selected by National Park Service and published in its 1984 General Management Plan for the island, (3) because most of the general public who expressed an opinion on the matter wanted the island left alone and not further developed; and (4) while some CINS Superintendents, out of self-interest, would support a higher number, there is little evidence to suggest that the general public wants the experience of visiting Cumberland to change.

The events that led to the selection of the 300 people a day figure transpired over a period of sixteen years, between 1968 when potential visitation levels of 10,000 people a day were first suggested and 1984 when the 300 number was formally approved by the National Park Service in its General Management Plan for Cumberland.

In the history that follows, the focus is on carrying capacity and limits to development on the island. Other issues that indirectly relate to carrying capacity such as creating the National Seashore and designating part of the island as Wilderness are mentioned to help establish the context for the carrying capacity history but are not treated comprehensively here. More thorough coverage of those issues may be found in Lary Dilsaver's *Cumberland Island National Seashore - A History of Conservation Conflict* (2004) and Charles Seabrook's *Cumberland Island – Wild Women, Wild Horses* (2002).

1968

Dr. Charles Keating of the University of Georgia asked the question: how many people would visit Cumberland Island each day if it were designated a National Seashore and if access were unlimited? The results were published in 1968: ten thousand people would be attracted each day. Dr. Keating did not endorse the figure as the number of people who should visit the island.¹

1971

At the urging of Alfred W. "Bill" Jones, the President of the Sea Island Company, Paul Mellon gave \$6 million² to the National Parks Foundation to acquire Charles Frasier's

¹ Charles Seabrook (2002) *Cumberland Island Strong Women, Wild Horses*; page 245.

² There is some disagreement over the amount of money that the Andrew Mellon Foundation donated to the National Parks Foundation to purchase lands on Cumberland. Figures range from \$6 million (N. Reed

portions of Cumberland Island and additional land owned by the Carnegies. “Once again, Mellon money enabled the federal government to save a choice piece of property for the American public”³

Mellon did not want Cumberland to be over-developed. According to Nathaniel Reed (Assistant Secretary of the Interior for Fish and Wildlife and Parks, 1971-76) Mellon said: “I think the development of Cumberland island as a national seashore should not follow the pattern of existing state and federal seashores that maximized recreation. There are simply too many assets on the island to allow it to be developed as Jekyll Island State Park or even as a Cape Hatteras.” (N. Reed essay, 2014, in press).

National Park Service (NPS) Director George Hartzog testified before Congress in November 1971 on NPS plans for the island should it be designated a National Seashore. The plan (the map is reprinted in Dilsaver, page 151) called for developments throughout the island that would accommodate the 10,000 people per day that Dr. Keating said would come. To Hartzog, the designation “National Seashore” implied that the site would be used for recreation and that other uses such as timber harvesting, mining and cattle grazing were permissible as long as they did not interfere with the primary goal of recreation.

Director Hartzog’s plan infuriated the senior management of the Department of the Interior including Rogers Morton, the Secretary of the Interior, and Nathaniel P. Reed, the Assistant Secretary for Fish and Wildlife and Parks, Nathaniel P. Reed, in part because Hartzog had not subjected the plan to rigorous agency review and in part because he had bypassed the Secretary and on his own had gone directly to the House and Senate leadership including Senator Alan Bible, the Chair of the Senate Interior and Insular Affairs Committee, and Representative Wayne Aspinall, chair of the House Subcommittee on National Parks, who visited Cumberland on November 10, 1971 (N. Reed essay, 2014, in press, and Fred Marland, 2009; personal communication).

One of the more contentious issues in the creation of the National Seashore was the proposed causeway from the mainland to the island. Congressman Russell Tuten (who preceded William Stuckey as Congressman for the district) wanted one. An early version of the bill called for the creation of a committee that would annually review the need for a causeway. But Senator Bible was against a causeway; so was Nat Reed. The Georgia Conservancy’s Bill Griffin, Jane Yarn and I and others also actively opposed the causeway because it would lead to the over-development of the island and deprive Camden County of much-needed tax revenue. George Hannaford, the Chairman of the Camden County Commission agreed. The final legislation prohibited the construction of a road or causeway connecting Cumberland to the mainland.

1972

essay) to at least \$6 million (Dilsaver, page 102) to \$7.5 million (Jim Gilbert, attorney for the Sea Island Company).

³ Dilsaver, page 102)

President Nixon signed the legislation into law on October 23, 1972 (PL 92-536) establishing Cumberland Island National Seashore. In response to Director Hartzog's plan, the House and Senate leadership inserted protective language that the National Seashore "shall be permanently preserved in its primitive state..." The Congress also included a requirement that a study be conducted of the potential for wilderness designation on the island; Hartzog's 1971 Plan had included none. In 1977, Thornton Morris claimed that the requirement was added because the Congress did not trust the National Park Service to protect the island environment (Dilsilver, page 161⁴)

Initial visitation to the island was limited by the size of the small ferry – about 35 people per day. A larger ferry was procured and up to 300 people per day could visit the island. Due to the ferry's capacity of about 150 passengers and its schedule, that number is rarely reached.

The Conservation Foundation (CF), a Washington, DC nonprofit think-tank, published *National Parks for the Future*⁵. CF made numerous recommendations for future national park management including involving citizens in the planning process, basing its planning on natural resource impacts and conduct carrying capacity studies to determine the appropriate number of visitors (Dilsaver, page 152).

1974

Bob Dennis and Sandy Hobbs, the editors of the Conservation Foundation study, enlisted the help of the Georgia Conservancy and Coastal Director Hans Neuhauser in conducting a follow-up study to *National Parks for the Future*: will its general and sometimes theoretical recommendations work in the real world, on the ground? Cumberland was selected in part because of its unusual legislative mandates to permanently preserve the island.

The first tasks were to persuade the NPS to abandon the Hartzog plan and "go back to the beginning" in its planning for CINS and to let citizens participate. E. U. Curtis "Buff" Bohlen (Nat Reed's Deputy Assistant Secretary of the Interior) was enlisted to help.

I argued that the 1971 plan was made without a thorough knowledge of the island; the Park Service did not know what natural and historic resources were present or where they were; they did not know what areas were resilient and what areas were fragile. The studies that would help the Park Service decide what areas to protect and what areas they might develop were in preparation but they had not yet been delivered.⁶

⁴ Dilsaver, L.M. 2004. Cumberland Island National Seashore – A History of Conservation Conflict. University of Virginia Press, Charlottesville.

⁵ Dennis, R.T. and S. Hobbs, editors (1972). *National Parks for the Future*. Conservation Foundation, Washington, DC.

⁶ For example, Hillestad et al's *The Ecology of the Cumberland Island National Seashore, Camden County, Georgia* published in 1975.

This ignorance on the part of the Park Service led to the destruction of what may have been one of the most important historic and archaeological areas on the island located south of the Dungeness mansion. The first Superintendent, Sam Weems,⁷ ordered student interns to bulldoze the area to get rid of the unsightly brush. We'll never know what was lost.

The initial pushback from the Park Service was a statement to the effect that “we’re the professionals and we know what we’re doing; we don’t need people to tell us how to develop Cumberland.” This was coupled with their intent to send someone from the NPS Denver Service Center to Cumberland for a site visit of two or three days after which the Center would prepare the plan for the island’s development.

I told a reporter with the *Savannah Morning News* about the Park Service’s refusal to let citizens – many of whom knew more about the island than the Park Service did - participate in the planning for Cumberland. The reporter’s story appeared on the front page of the newspaper the next day. That morning, I got a call from David Thompson⁸, the NPS Southeast Regional Director, who said, “Let’s talk.”

The Conservation Foundation and Georgia Conservancy (CF/GC) assembled four teams to examine natural resource management, transportation, priorities for interpretation and visitor carrying capacity.

Initial discussions of carrying capacity considered a wide variety of options ranging from three people (“as long as I was one of them”) to thousands carried to the beach on a monorail to tens of thousands viewing the island from gondola cars that never let visitors set foot on the island.

Drs. Al Ike and Jim Richardson, members of the CF/GC carrying capacity study team and faculty members at the University of Georgia provided a more logical framework for consideration. First, they considered Cumberland in a regional context, stating “A visit to Cumberland Island should be a rare experience that does not duplicate similar visits to other coastal islands” They then wrote: “**Recreational carrying capacity is the maximum number of people, involved in a given activity, that can be supported by a given site without degrading the environment or the quality of the visitor’s experience** (emphasis added). Their initial findings published in 1974⁹ estimated the carrying capacity of nearly 16,000 visitors per day “without damage to the island’s environment.” In 1975, they revised the figure down to 14,382 people – the bio-physical carrying capacity.

The carrying capacity that defines “the quality of the visitor’s experience” – the psychological carrying capacity - is different from the bio-physical carrying capacity. The psychological limits could not be determined without additional data. Ike and

⁷ Sam Weems was the Seashore’s first Superintendent, serving from 1973 to 1974..

⁸ David Thompson, NPS Southeast Regional Director, 1970-1977.

⁹ Ike, A.F. and J.I. Richardson (1974; revised 1975). Estimating Carrying Capacity for Cumberland Island National Seashore. Institute of Community and Area Development, University of Georgia.

Richardson recommended that the psychological carrying capacity be determined experimentally. Park managers should “start with relatively low numbers of visitors and that they will increase density according to a cautious plan of trial, observation and reassessment.” Thus, the limit on carrying capacity is neither biological nor physical; rather it is psychological – especially the impacts of various levels of crowding on the quality of the visitor’s experience of visiting the island.

The CF/GC study also recommended that units of the National Park system be managed on the basis of the unit’s resources and not on the basis of what the unit was called. For Cumberland Island, the recreational resources (e.g., the beach and camp grounds) should be managed for recreation, the natural areas (e.g., the sand dunes, Lake Whitney, the marshes) should be managed for their natural resource values, and historic features (e.g., Dungeness, Plum Orchard) be managed as historic resources. The leadership of the Department of the Interior were already predisposed to this idea and accepted the recommendation not just for Cumberland Island but for the Park System as a whole.

1976

In 1976, Superintendent Paul McCrary¹⁰ presented a summary of the NPS’s *Environmental Review for the General Management Plan and Wilderness Recommendation*. The McCrary plan called for a total of 1,060 persons being accommodated on the island at one time...assuming a 50% turnover for the day use activities, the NPS planners added another 400 for a daily total of 1,460 (Dilsaver, pages 158-159). Developments would occur in the north, central and southern parts of the island. The leftovers would be considered for wilderness designation.

The Georgia Conservancy proposed an alternative wilderness plan (GA Conservancy newsletter). Carol Ruckdeschel’s criticism leads to modifications into what become the final plan.

1978

NPS Director Bill Whelan visited CINS on October 25. Paul McCrary (CINS Superintendent), Whelan and Hans Neuhauser drove north into the proposed wilderness area. Whelan questioned the hikers he met about wilderness. To a person, they all support the idea. Whelan also talked briefly with some island residents including wilderness advocates Carol Ruckdeschel and Louis McKee. Before Whelan left the island, he announced his support for the citizens’ plan in which the northern half of the island minus Plum Orchard would be recommended for wilderness and potential wilderness.

1981

¹⁰ Paul McCrary was Superintendent from February 1976 to September 1981.

In February 1981, the Park Service released a *Final Environmental Impact Statement and draft General Management Plan* for the island. Among other things, the proposal called for planning to accommodate 1,460 people per day. This number was initially supported by representatives of the actively engaged conservation groups including Bill Mankin with the Sierra Club; Randy Snodgrass with The Wilderness Society and Hans Neuhauser with the Georgia Conservancy.

Robert Coram, a former Park Service ranger on Cumberland and now a “reporter” with the *Atlanta Journal and Constitution* along with its editorial board vigorously opposed the developments and the increase in number of visitors (Seabrook, page 246). Coram also attacked the conservation organizations’ leaders including me. Over 4,000 people wrote to Joe Brown, the Regional Director of the NPS saying, in essence, “**leave the island alone.**”

Thornton Morris, reflecting Ike and Richardson’s recommendation to determine carrying capacity by an experimental approach, said, “You’ve got the best data you could ever get about keeping it at 300 people per day.”¹¹

Regional Director Brown resigned soon thereafter and was replaced by Robert M. Baker. On June 29, 1981, the *Atlanta Constitution* quoted Baker as saying, “The revised plan will be a reflection of what the public wants to happen on Cumberland.”¹²

In November 1981, the Park Service issued a revised summary brochure outlining its new plans. Among the commitments was: “Visitation is to remain at approximately 300 people a day.”

1984

In January, the Park Service released the General Management Plan (GMP) for Cumberland Island National Seashore. In the GMP’s section on carrying capacity, it stated “about 300 people will visit the island each day” (page 48 of the GMP). Elsewhere, the GMP refers to the “300 visitor-a-day limit.” The GMP was formally adopted in February 1984. This, then, became the carrying capacity of Cumberland as determined by the public who cared enough to write the Park Service with their opinions. As Woody Allen remarked, “The world belongs to those who show up.”

It was the first time the agency had ever set a visitor limit for an entire national park¹³ It was also the first time that the limit was set on the basis of psychological carrying capacity - the quality of the visitors’ experiences.

The ferry boat, limited by both capacity and schedule, thus became the primary tool or mechanism for controlling visitation rather than the method of determining the

¹¹ Quoted in Dilasver, page 209.

¹² Quoted in Dilasver, page 209.

¹³ Seabrook, page 246.

appropriate number of visitors. In other words, the capacity was not determined by the number of passengers the ferry could carry; rather, the capacity was determined through experimentation and adopted in official policy and the ferry became the tool to control the number.

Post 1984

At some point following the adoption of the GMP, an unknown Superintendent subtly changed the words from a 300 people a day limit to: “about 300 visitors on the island at any one time” (Compendium of Superintendents Orders, 2014), saying “this regulation is derived from the General Management Plan.” The change was neither authorized by the Regional Director nor had it been subject to public review as required by the General Management Plan (see GMP, page 48).

A cynic will note the expansions provided by the addition of the words “about,” “visitors” (as opposed to persons which would include Park Service staff and retained rights holders and their guests) and “at any one time” (rather than per day; change the ferry boat capacity and schedule and the number could double or even triple per day).

Conclusions: The Need for Eternal Vigilance

On occasion, Camden County business interests and others express an interest in increasing the number of tourists allowed to visit Cumberland Island. They are often motivated by the positive economic impacts both to themselves and to the local community. Occasionally, CINS Superintendents will pine for a higher number to placate their neighbors’ wishes and to increase their standing within the National Park Service where park size and visitation levels are measures of both prestige and pay scale.

While the history of how the Park Service set the policy of 300 visitor figure came about may never placate those interested in increasing the number for economic gain, this narrative helps explain that the number is neither arbitrary nor capricious. The number persists, not as blind obedience to the past, but because there is little evidence that the public wants the experience of visiting Cumberland (with a 300 person limit) to change.

The history of the National Park Service’s support for a particular number of visitors, from an expected 10,000 a day in 1971 to a limit of 300 visitors a day in 1984 to about 300 visitors on the island at any one time (by 2014) emphasizes the need for continuing citizen vigilance, both by individual citizens and by conservation organizations.¹⁴ The latter are particularly important because of their collective wisdom, their ability to persevere over the long haul and supporting the leadership that is necessary for success.

¹⁴ The same holds true to the wilderness designation, which NPS officials have opposed on a number of occasions. For instance, the NPS had the beach removed from potential wilderness status without any public input.