Whose Sacred Place? Planning Conflict at Cumberland Island National Seashore

Lary Dilsaver

he American national park system consists of legally defined reserves managed within a web of laws and policies. The parks also are cultural constructs, sites where valued places and resources are preserved for future generations. As such, they have always been open to interpretation and to a division of public opinion about what is worthy of protection, what activities should occur in such "sacred places," and who should make decisions regarding their future. Public idealism, National Park Service tradition, and threats from surrounding land uses make the parks contested landscapes where a democratic population imprints its beliefs on the land.

Historical geographers are part of a growing cadre of scholars who study the meaning and management of the national park system. Ronald Foresta has provided a trenchant analysis of the National Park Service and its management policies in National Parks and Their Keepers. Lary Dilsaver has studied management of overcrowding, Dilsaver and William Tweed have studied National Park Service relations with concessionaires, and Dilsaver and William Wyckoff have examined the process of overdevelopment. Stanford Demars focused on Yosemite National Park to demonstrate the effects of such crowding. Michael Yochim has written on attempts to build dams and the historical geography of snowmobiles in Yellowstone National Park. Michael Conzen and Edward Muller have studied the complexities of national heritage areas at the Illinois and Michigan Canal and Rivers of Steel sites respectively. The meaning of national parks also has been a popular subject. Wyckoff and Dilsaver have explored the construction of images to draw tourists, Judith Meyer has analyzed the cultural and spiritual meaning of Yellowstone, and Terence Young has shown how a historic scene in a park may be a carefully wrought but inaccurate artifact.3 Environmental historians have also contributed to the growing body of literature about the park system led by Hal Rothman, Alfred Runte, and Richard Sellars. Indeed, there now exist "administrative histories" for nearly 100 individual park units from the current total of 388.5

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One topic that has not received adequate attention is the management of multiple-resource parks and the legal constraints and cultural issues that make it difficult and controversial. Many units of the system contain a mix of natural, historical, and recreational resources. Congressional preservation legislation and National Park Service policies are usually resource specific and do not necessarily take other types of resources into account. In cases where different types of resources overlap spatially, protection of all of them can be challenging. Three factors have led to this type of management problem in a number of park system units. First, most of the units established after World War II are located in well-settled areas with historic development and land uses. This is particularly the case along rivers and coastlines and in the crowded eastern United States.

Second, the fundamental laws that direct National Park Service management create conditions where it is either impractical or unaffordable to satisfy all of them at a site where resources overlap. Two laws passed in the 1960s are especially difficult to coordinate. In the Wilderness Act of 1964 (and its derivative, the Eastern Wilderness Areas Act of 1975), Congress established a mechanism to create a system of permanently preserved areas without roads or other types of human intrusions. The National Historic Preservation Act of 1966 ordered federal agencies to study, protect, and maintain historic resources including archaeological sites and historic structures. At first glance it would seem that these laws should be spatially exclusive. However, both wilderness laws allow historic structures to exist within a wilderness area. The reality of later applications of the laws has created situations where maintaining historic resources in a wilderness area is extremely constrained.

Third, Congress passed the National Environmental Policy Act of 1969 (NEPA), a sweeping law that mandates public involvement in the planning process for parks and other federal lands. NEPA requires open hearings, issuance of draft plans for public review, and a responsibility to explain any deviance in a plan from what the public wants. NEPA has allowed special interest groups to strongly influence park planning and management.

The overlap of resources and the *de facto* clash of legislation have created the greatest controversy at Cumberland Island National Seashore, a small 28,000-acre barrier island off the coast of Georgia. Established in 1972, the seashore is the site of one of the largest remaining, undisturbed maritime oak forests, a sixteen-mile long beach perfect for mass recreation, and several dozen historic sites ranging from the archaeological remains of Native American villages to three large mansions from the Gilded Age. Active, politically powerful interest groups support each category of seashore resources. Each group believes that the National Park Service must follow the letter of the law that protects its favorite resource and that other missions should be sacrificed if necessary to do so. The Park Service itself is divided on the priority of the island's many resources.

In the national seashore's thirty-two-year history, every Department of the Interior Secretary and several presidents have become involved in the resulting conflict. Four superintendents have been removed under political pressure. It took ten years to complete a wilderness recommendation and eleven years to design a general management plan. Some twenty-two years after Cumberland's wilderness area was established the island still does not have a wilderness management plan. The historical geography of Cumberland Island National Seashore is one that readily demonstrates the difficulties that arise where multiple public interest groups try to impose different management prescriptions and where the laws do not clarify the situation.

Georgia's Golden Isle

Cumberland is a barrier island that lies approximately three miles from the mainland near the Georgia-Florida border (Figure 1). Approximately 18 miles long and from one-half to three miles wide, it has been settled by humans for at least 6,000 years. The Spanish built several missions on the island. Later the British erected a fort on either end. Permanent non-Native American settlement commenced after the American Revolution with acquisition of much of the island by war hero General Nathaniel Greene. During the antebellum period, the island functioned as one of the premier sites for sea-island cotton. Extensive deforestation and other modifications of the natural landscape occurred during this time.⁹

In 1881, Thomas Carnegie, the brother and partner of Andrew Carnegie, bought much of the island, and turned it into a vacation retreat for the wealthy. In reality, his wife Lucy did most of the work because Thomas died in 1884. The couple had nine children who lived much of their lives on the island. They built five mansions, three of which survive today. When Lucy Carnegie died in 1916, she left a trust arrangement whereby the island could not be sold as long as any of her children lived. The last heir died in 1962 and the grandchildren divided the island. A court document approving the division stipulated that all heirs could drive the Main Road along the length of the island, although it remained vague on most other roads. ¹⁰

Several of the heirs wanted to sell their land, which precipitated a move by the others to invite the National Park Service to buy the rest for a park. A long and controversial battle raged during which some heirs kept their private land while others sold to the National Park Foundation for the future park. Owners who sold to the foundation or later to the National Park Service exacted nineteen different retained rights agreements whereby they could live on plots on the island through their lives or those of their children. Many other rights including vehicle use of the Main Road continued.¹¹

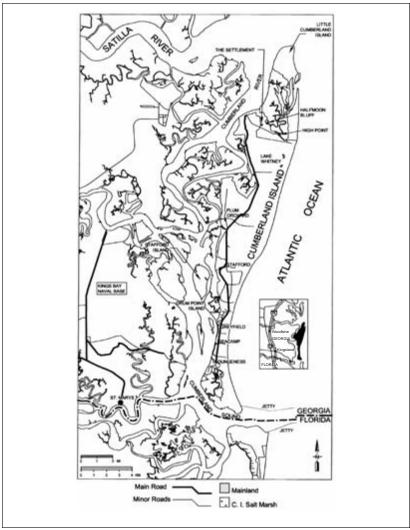


Figure 1. Cumberland Island National Seashore.

President Richard Nixon signed the bill creating Cumberland Island National Seashore on October 23, 1972. As a national seashore, the new unit technically fell within the recreation category of park system units. However, the legislative history of the seashore is replete with congressional concern over potential overcrowding, danger to the ecosystem, and the fate of historic resources. Throughout the congressional hearings and reports, legislators stressed the island's importance in all three of the national park system's missions—recreation, cultural resource protection, and natural resource preservation. However, Congress gave no specific direction for the future management of the complex new unit.¹²

Planning Cumberland Island National Seashore

From the beginning, the National Park Service faced uncertainty and conflict over how to prioritize the resources and purposes. Budget limitations and conflicting laws and policies demanded decisions unpopular among some agency personnel and segments of the public. Even Park Service natural resource and cultural resource specialists clashed over the worth of the Plum Orchard Mansion which the former called a "white elephant." The presence of a highly vocal and politically powerful group of island residents further complicated management. Seashore officials faced three major tasks with the new unit. First, they had to devise a general management plan that would specify how the agency would develop recreation facilities, including a transportation system, and establish the appropriate level of visitation, while protecting all the resources. Second, the establishing act for the seashore required the National Park Service to determine how much of the island, if any, was suitable for designation as a wilderness area.¹³ Third, when Congress did establish wilderness on Cumberland, the agency had to develop a wilderness plan to explain which public activities and management procedures were appropriate in the restrictive zone. Of particular importance were questions about the privileges and limits on the island's residents, both contract holders and fee simple owners. Could they have retained estates in a wilderness? Could they drive the Main Road in that zone? Where else could they drive?

During the 1971 congressional hearings on the bill to establish Cumberland Island National Seashore, the National Park Service had promised extensive recreation development for visitors over much of the island. Officials explained that the designation "national seashore" meant a high capacity for recreation and promised up to 10,000 visitors per day for Cumberland. It is unlikely that the Park Service could have secured enough local and state backing to establish the new seashore without proposing mass tourism that would offset the loss of tax revenue in Camden County. After the national seashore became a reality, Park Service planners assumed that they were bound by their promises to implement extensive development.¹⁴

Just prior to the hearings, the National Park Service released a "master plan" that outlined its ideas for recreation on the island (Figure 2). The primary visitor center would be on the mainland, connected by a fleet of twelve 100-passenger ferries to the island. Each of three island debarkation sites would have interpretive facilities, a jitney terminal for island transportation, and concession facilities to sell picnic supplies and rent bicycles and camping equipment. The jitney service would run the length of the island connecting the three docks as well as three beach areas, six campgrounds, and historic areas like High Point, Dungeness, and Stafford.¹⁵

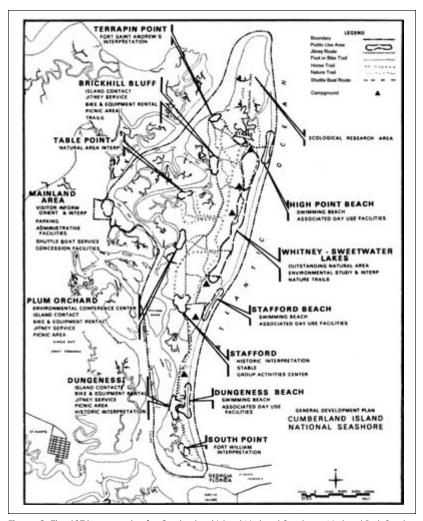


Figure 2. The 1971 master plan for Cumberland Island National Seashore. National Park Service map, Cumberland Island National Seashore Archives.

The Park Service planned to develop three beach areas that would accommodate 7,000 sunbathers at one time. Their plan also included a stable, a bicycle rental concession, multiple camping and dining facilities, numerous interpretive sites, and many miles of new trails. NPS officials planned to turn the Plum Orchard and Stafford mansions into environmental conference and study centers. The planners offered no specific upper limit of visitors, but the level of development and capacity of the intensive use beach zones suggested that 10,000 visitors per day could be easily accommodated.¹⁶

Any questions the National Park Service might have had about this level of development seemed to be answered in an in-depth study con-

ducted by the highly respected Conservation Foundation.¹⁷ Teams from the foundation studied each development area of the agency's master plan and consulted ecological and recreational literature to estimate the carrying capacity. In 1975, the Conservation Foundation released its report estimating that the island could tolerate approximately 14,400 visitors per day. The authors suggested that the Park Service should develop infrastructure and increase visitor capacity slowly to gauge the impacts on the ecology and visitor satisfaction. Seashore officials argued that these figures, coming from a reputable conservation organization, supported the 1971 master plan.¹⁸

After establishment of the seashore, the National Park Service decided to design a general management plan and a recommendation for wilderness at the same time. The general management plan serves as the basic guide to seashore policies and programs. The wilderness recommendation was due to Congress in October 1975. During the next few years, consultations with environmental groups and criticism from island residents led the agency to back away from the master plan's visitation and infrastructure levels. Instead planners offered an array of options for camping, beach use, embarkation points, historic interpretation programs, and visitor limits. Superintendent Bert Roberts suggested that while 10,000 people per day remained a viable maximum for visitation, he expected that 5,000 to 6,000 visitors per day was a more realistic figure of what the transportation system would bring to the island. ¹⁹

In February of that year, the National Park Service held a hearing in Woodbine, Georgia, to receive input from the public on their draft plans. Approximately 200 people attended, primarily members of several environmental organizations. To the surprise of agency planners, the speakers soundly rejected all aspects of the scaled-down plan. They countered that a jitney system was unnecessary, that a few hundred visitors, not 5,000, was a reasonable number for a small and fragile island, and that the Park Service's wilderness recommendation excluded every road, historical site, and retained estate, badly compromising the proposed wilderness. Island residents, afraid that mobs of visitors would intrude on their jealously guarded solitude, agreed with environmentalists' criticism.²⁰

After the hearings, seashore planners returned to the job of designing draft versions of the general management plan and wilderness recommendation. The vast difference between the original plans and what the public at the hearings demanded demonstrated the gap between the National Park Service's concept of its mandate and opinions of environmentalists and island residents. Somehow, agency officials had to forget promises made during the legislative battle and their own experience in developing mass seashore recreation.

In July 1977, the Park Service released a new draft general management plan and wilderness recommendation. Agency planners had dramatically changed every area of the original master plan. The new plan called for beach development only on the southern end of the island for

400 people, rather than 7,000. Food services were reduced to a few vending machines in the developed areas. Horseback riding and bicycle concessions had been eliminated. The Park Service had lowered the visitor limit from 10,000 to 1,460 per day. The plan proposed a much-reduced jitney service, which would operate between Stafford and Dungeness with occasional tours to Plum Orchard mansion and the "Settlement," a cluster of former slaves' homes at the north end of the island. Finally, the Park Service recommended wilderness designation north of Stafford for a total of 8,851 acres and that another 11,794 acres to be established as "potential wilderness." Exclusion of the Main Road and High Point, the large estate retained by the Candler family at the north end of the island, divided the wilderness acreage into three parcels. ²¹

Two months later, the National Park Service confidently presented its new management plan and wilderness recommendation at hearings in St. Mary's and Atlanta.²² Once again the reactions of the audiences shocked veteran officials. For the second time, seashore planners heard the Park Service characterized as an irresponsible agency recklessly rushing to destroy the island. Every environmentalist challenged the idea of running jitney tours to the north end. One pointed out that one of the three proposed units of wilderness did not meet the 5,000-acre minimum required by the Wilderness Act.²³

The National Park Service had expected some antagonism to the plan from environmentalists. However, island residents also opposed the new plan. They pointed out that the wilderness proposal was an addition to the seashore's establishing act ordered by congressmen who did not trust the National Park Service to protect the island environment. ²⁴ Once again, Park Service planners regrouped to study their proposals. However, the draft plans and environmental statement had touched off a continuing public debate. The conflict over jitney travel to the north end of Cumberland eventually led Park Service leaders in Washington to discontinue motorized transportation for visitors on all of the island. ²⁵

After a great deal of soul searching and careful consultation with environmentalists, the National Park Service released yet another draft general management plan and wilderness recommendation to the public on February 25, 1981.²⁶ At that time Cumberland Island was a quiet backwater for a national park unit. Only 300 visitors, two ferry loads, came to the island on the busiest days. Island transportation between Dungeness and Sea Camp had been suspended two years earlier. Only one developed campground existed near the Sea Camp dock and three tiny primitive camping areas were located in the backcountry. No concessions, no beach facilities, and no stables for horseback riding existed. At the two debarkation points, the Park Service used existing structures, most of them historical, for limited interpretation and island management.

Compared to all the previous drafts, the new document suggested only moderate changes. The most significant were the classification of

nearly 20,000 contiguous acres as wilderness or potential wilderness and reestablishment of transportation at the south end of the island. Very limited additional tours to Plum Orchard and the Settlement by way of the Main Road also would be available until retained rights were extinguished. The plan proposed several new backcountry campsites and again recommended a visitor limit of 1,460 per day.²⁷

The public response was even more antagonistic than before. Most of the more than 4,000 who commented on the drafts accepted the wilderness proposal with relatively little comment. However, they directed withering criticism at nearly every aspect of the scaled-down management plan. As in the past, the greatest furor focused on the level of visitation and visitor transportation into the proposed wilderness. ²⁸ Again National Park Service planners were caught completely off guard. In part this was due to the muted response from environmental organizations. The initial statements of the Georgia Conservancy, Atlanta Audubon Society, Sierra Club, and Wilderness Society were cautiously favorable. Each group was relieved to see the new wilderness proposal and together they expressed preliminary agreement with the goals if not the details of the development plan. ²⁹ A reporter for the *Atlanta Constitution* accused them of abandoning their principles and "caving in" to the Park Service. A spirited exchange of angry letters to the editor and caustic newspaper articles followed. ³⁰

A month later, the National Park Service scrapped the 485-page plan and ordered park planners to divide planning for the general management plan and the wilderness recommendation into two separate procedures. The generally favorable response to the wilderness proposal convinced agency officials that they could rush through a report to Congress, already six years overdue. In the meantime, seashore planners could try once more to design a management plan that would satisfy the island's troublesome constituency.³¹

The Wilderness Bill

The generally favorable response to the wilderness recommendation left the National Park Service free to draft a wilderness bill for the island with the help of environmental organizations. The Georgia Conservancy and other conservation groups convinced the Park Service to include the Main Road north of Plum Orchard in the wilderness area, and to designate the portion of the road from Plum Orchard southward to Stafford as potential wilderness. Local Congressman Ronald "Bo" Ginn introduced a bill with these provisions in the House of Representatives on October 7, 1981, where it met a favorable response.³²

On October 16, 1981, the House Subcommittee on Public Lands and National Parks held a brief hearing on the bill.³³ Most of the speakers favored the bill, although some suggested changes. One environmental

organization, the Coastal Georgia Audubon Society, warned against including the main road south of Plum Orchard in wilderness or potential wilderness. The group's president suggested that cost of maintaining the mansion by boat would be prohibitive, and taking visitors to Plum Orchard by boat would cost more and take up too much of their limited time on the island.³⁴ Other environmental groups hotly contested this recommendation and urged the legislators to designate all the roads as wilderness immediately.

Representatives of the island's fee-simple owners and retained rights holders also spoke and submitted a long letter of comment. They reported that the residents supported the proposed bill in principle, but wanted to make sure that their rights would take precedence over the restrictions of wilderness designation. They categorized these caveats as "valid existing rights" and suggested that the phrase be inserted in the bill. The final bill incorporated these changes and President Ronald Reagan signed it into law on September 9, 1982.³⁵

Public Law 97-250 gave the National Park Service wilderness designation for 8,840 acres and potential wilderness status to another 11,718 acres. While the final act did not address many management specifics, those who later interpreted the law relied on its legislative history for guidance. In discussions and hearings on the bill, Congress had addressed some concerns central to administering Cumberland Island's many resources. Legislators agreed that the National Park Service could maintain the Plum Orchard mansion and the Settlement by vehicle over the Main Road. Furthermore, the agency could bring small groups to visit the two sites. However, they also made it clear that they favored stringent adherence to the Wilderness Act of 1964 wherever and however possible. To that end the lawmakers charged the Park Service to use water transportation unless it was completely impractical and unaffordable. President Reagan, in his statement on the new law, echoed Congress when he admitted there were considerable inconsistencies in a wilderness area with houses and vehicle traffic, but that the island would develop into a proper wilderness as the retentions ended. Like Congress, President Reagan offered no specific recommendations on how to manage this legal contradiction.³⁶

The Final General Management Plan

Simultaneously, National Park Service officials resumed work on the overall general management plan. The catastrophic response to the original 1981 draft plan had chastened agency planners. During the summer and fall of that year, seashore planners and the Georgia Conservancy hosted meetings to collect input on the plan. The overwhelming response was to "leave the island as it is." Only representatives of Camden County sought higher visitor numbers and more development. However, their voices were lost in the anti-development rhetoric.³⁷

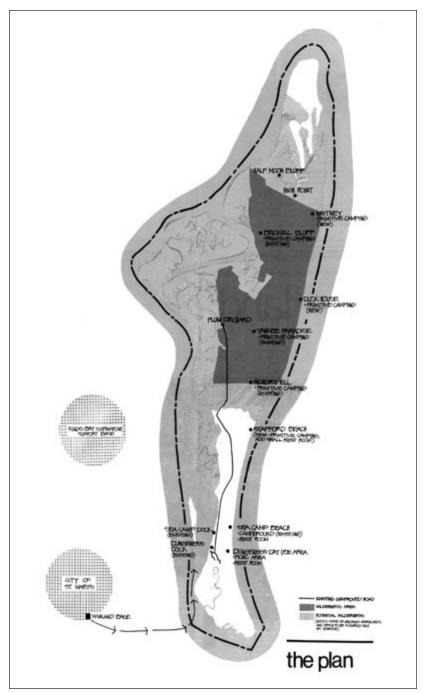


Figure 3. The 1981 Revised General Management Plan. The Park Service issued this plan after the public rejected its development-oriented plan earlier in the year. National Park Service map, Cumberland Island National Seashore Archives.

Seashore planners issued a revised general management plan summary in November 1981 (Figure 3). It included most of what the environmentalists and island residents wanted. Visitation would stay at 300 people per day. The Park Service planned to limit camping to the existing developed site at Sea Camp, and add one "transitional" campground with a bathroom but no fire pits or tables near Stafford and five primitive camping areas in the wilderness. Because of the lower visitation limit, the agency abandoned all development at the beach, scaled down plans for the two docks, and eliminated island transportation except for occasional tours to Plum Orchard. They also promised to study seriously the option of boating tourists to the mansion.³⁸

Island residents and the principal environmental organizations immediately approved the changes incorporated into the new plan, but environmentalists offered further recommendations. The Sierra Club proposed that the Park Service should use horses for patrolling the wilderness, conduct all tours of Plum Orchard by boat, and delete two of the proposed campgrounds. The Park Service accepted these suggestions and issued its final general management plan in January 1984, more than eleven years after the seashore's creation.³⁹

Wilderness Use

During the campaign to create the national seashore and the tortuous process of designing a general management plan, environmentalists and island residents found themselves on the same side. That alliance continued as the two groups sought wilderness designation to block any future attempts by the National Park Service to extensively develop the island. The alliance ended abruptly when the Park Service turned to managing the wilderness. Some twenty-two years have passed at Cumberland Island without a wilderness management plan. Opposing values held by the former allies and a *de facto* conflict between preservation laws have turned the idyllic island into a legal battlefield.

Without clear direction from Congress, seashore administrators faced a number of challenges. For guidance, they relied on three pieces of legislation—the Wilderness Act of 1964, the Eastern Wilderness Act of 1975, and Cumberland's wilderness act. The 1964 law expressed an ideal to strive for:

Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area ...[and] no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other forms of mechanical transport, and no structure or installation within any such area.⁴⁰

Although the Wilderness Act allowed for nonconforming activities associated with retained rights, the 1964 lawmakers never anticipated the number of intrusive uses present at Cumberland Island. Neither did the framers of the 1975 Eastern Wilderness Areas Act, which specifically allowed retained rights in wilderness. ⁴¹ The intensity of interest-group attention increased the difficulty of managing the wilderness area. The conflict focused on two related issues. First, how tightly did the 1964 act restrict the use of vehicles and motorized equipment in Cumberland Island's wilderness? Second, how could the many historic resources in the wilderness zone be maintained affordably without the use of such machines?

Environmental groups challenged the rights of retained estate holders to drive anywhere other than the main road in the wilderness zone. Island residents protected their traditional uses just as fiercely. Environmentalists also maintained that the Park Service itself should not use vehicles or power tools, and that people renting from the residents had no right to drive. 42 They also challenged the right of the Greyfield Inn, a resort on private land run by one branch of the Carnegie family, to conduct motor tours of Plum Orchard and the Settlement for their guests. To groups like the Georgia Conservancy, this practice seemed to flout the 1964 Wilderness Act's stipulation against "commercial enterprises" in a wilderness area. However, the Greyfield owners argued that it was part of their legal right to traverse the roads on the island as established by the court decision dividing the island among the heirs. National Park Service solicitors suggested that the Park Service might be able to ban the tours, but admitted that the matter would probably have to be settled in court. 43 Through the 1990s, the Park Service elected not to pursue this contentious course as every land protection plan listed the Greyfield wilderness tours as an activity "beyond the management control of the NPS."44

Cumberland Island contains numerous historic and archaeological resources scattered across the island. The National Register of Historic Places lists six multiple-resource historic and archaeological districts plus the main road on the island. Two of the historic districts as well as much of the road are affected by the wilderness designation. The High Point/Halfmoon Bluff District at the north end, including the Settlement (Figure 4), lies within the potential wilderness zone. The Plum Orchard District, with its huge mansion, is surrounded by wilderness on all its land boundaries. Prior to Cumberland's wilderness act, the Park Service maintained the two complexes by vehicle using the main road. When Congress created the wilderness area, both areas became sources of controversy.

Plum Orchard mansion in particular, with its enormous maintenance cost, became a lightning rod for conflict (Figure 5). The Carnegie heirs donated the mansion and \$50,000 for its maintenance to the National Park Foundation in 1970. The Park Service assumed control with creation of the national seashore. Thereafter, the agency spent several million dollars struggling to prevent the mansion's decay in the hot and humid southern Georgia climate. In spite of the Park Service's efforts, the house continued to deterio-



Figure 4. The African-American church in the Settlement, site of John F. Kennedy Jr.'s wedding. National Park Service photo, Cumberland Island National Seashore Archives.



Figure 5. Plum Orchard Mansion. National Park Service photo, National Park Service Archives, Harpers Ferry, West Virginia.

rate. Eventually, disgusted island residents founded the Cumberland Island Historical Foundation to organize protection for the mansion and other historic resources. The foundation sought money for repairs to the interior of the house, while working with the seashore officials to find an organization to lease and care for it.⁴⁶

In 1994, the historical foundation led an effort to create a Carnegie-Cook Center for the Arts. This organization planned to secure funding from corporations and foundations to lease and refurbish Plum Orchard as a retreat for "education and research in the broad field of American fine and performing arts." Supported activities would include seminars, workshops, classes and symposia as well as full support for artists in residence for specified periods of time. 47 The National Park Service enthusiastically greeted this proposal and secured a promise from the Carnegie-Cook group to allow visitors to tour the first floor. In addition, the arts group agreed to restore the nearly disintegrated Plum Orchard carriage house for additional rooms. In turn they wanted permission to house thirty staff members and long-term guests plus bring over up to 300 additional people four times per year for colloquia and other meetings. The Park Service agreed to exclude the colloquia participants from the daily visitor count. Finally, it seemed the agency had a solution to the emotion-charged Plum Orchard problem.⁴⁸

During 1995 and 1996, while the Park Service drafted a memorandum of agreement giving the Carnegie-Cook Center a fifty-year lease on the mansion, opposition grew among environmental groups. Environmentalists warned that people living at or visiting the center would inevitably spill into the adjacent wilderness and damage its resources. They also cited additional concerns such as increased automobile traffic on the main road, the probability of a new wave of construction at Plum Orchard and on private lands, and the detrimental effect that a fifty-year lease would have on later planning and wilderness legislation.⁴⁹

On January 24, 1995, the Arts Center proponents, including the Cumberland Island Historic Foundation and the Park Service, met with the environmental groups. The debate quickly polarized around the fundamental philosophical beliefs of the opposing forces. Even the seventy-five-year-old National Parks and Conservation Association, pledged to support preservation of all national park system resources, questioned nearly every aspect of the memorandum.⁵⁰ In response, the Carnegie-Cook faction dropped its plan to build new structures and agreed that the 300 people participating in the quarterly colloquia would be housed on the mainland. Nevertheless, environmentalists still opposed the agreement claiming that it provided a window of opportunity for development in the middle of the wilderness. They resolved to stop it at all costs.⁵¹

In February 1996, the Park Service issued a "finding of no significant impact" approving the lease of the mansion to the arts group. ⁵² In response, a new environmental group, the Defenders of Wild Cumberland, filed a lawsuit to block the memorandum of agreement for Plum Orchard. This froze the plan and set Park Service solicitors to work analyzing the entire scheme. Apparently, they did not like what they saw, for in mid-June, the Park Service cancelled the agreement, citing the need to initiate a new lease procedure under guidelines specified in the National

Historic Preservation Act and NEPA. Bitter Carnegie heirs and historic preservationists had to start all over looking for a way to save the historic house.⁵³

Searching for a Wilderness Management Plan

National Park Service wilderness management at Cumberland Island frustrated both environmentalists and retained rightsholders. Both groups complained that officials made spontaneous decisions for each situation without consistent policy guidelines. Park Service policy requires each unit with wilderness acreage to have a wilderness-management plan. Yet in 1996, with the Cumberland wilderness fourteen years old, the seashore still did not have one. At the same time, the level of conflict between various interest groups grew more emotional and vicious with each passing year. The agency's reactive and somewhat erratic management faced almost certain lawsuits in the near future.

Seashore officials dreaded the prospect of designing a wilderness-management plan. It was hard to know where to start with such poor congressional guidance in the 1982 act and with such diametrically opposed interest groups. Furthermore, the historic preservation and wilderness laws seemed almost contradictory. Historic preservation legislation demanded protection for Plum Orchard and the other historic structures, yet wilderness legislation made it impractical. Planners would have to set firm parameters for beach and road driving, determine the rules for maintaining historic structures in the wilderness, and decide whether to sanction traditional uses by the island residents or stick to the letter of the law and the specifics of individual retained rights agreements. In all likelihood, lawsuits would result from any managerial choices.

In December 1996, a new superintendent, Denis Davis, arrived at the seashore with strong credentials in park planning. He hoped to use collaborative input from all the interest groups to formulate a wilderness plan and solve the dilemma over use of the Plum Orchard Mansion. However, he underestimated the degree of philosophical opposition and personal hatred that had developed between the factions. Island residents had formed another association, the Cumberland Island Preservation Society, to advocate increased protection for historic structures and defend their rights against aggressive environmental organizations like the Defenders of Wild Cumberland. The groups sued each other within months.⁵⁴

In October 1997, the Cumberland Island Preservation Society, at Davis' urging, sponsored a forum on wilderness planning. Residents, environmentalists, historic preservation specialists, Park Service officials, and a professional meeting-facilitator attended. The results were promising. Participants avoided recriminations and discussed all the ramifications of wilderness planning for the island. They identified a number of issues to be addressed by wilderness planners including a definition of Cumberland's wilderness and its boundaries, retained rights including vehicle use, visi-

tor activities and the limit on their numbers, and identification and preservation of historical and archaeological resources.⁵⁵

The following spring, the preservation society hosted two more meetings. The first considered the Plum Orchard dilemma. Historic preservationists and island residents dominated this forum and struggled with how to fund the mansion's rehabilitation and carry out maintenance surrounded by wilderness on nearly all sides.⁵⁶ The second meeting again addressed wilderness planning and all the related issues raised in the October meeting. This time, several preservation society members suggested that the main road be "cherry-stemmed," that is, removed from the wilderness. In this way building supplies and visitors could be carried to both Plum Orchard and the Settlement by vehicle. This option would be far less costly than access only by boat. Residents and historic preservationists also called for removal of all features on the National Register of Historic Places from the wilderness. They suggested that Congress could add a portion of the south end of the island to compensate for the loss of the wilderness acreage of the road and historic sites. Much of the suggested southern acreage consisted of marsh and dredge spoils dumped by the U.S. Army Corps of Engineers in the 1950s. Seashore officials and environmentalists rejected these ideas.⁵⁷

During these negotiations, a new opportunity arose for the National Park Service. The owners of the Greyfield Inn offered to sell another portion of their land, more than 2,000 acres, to the Park Service for approximately \$18 million. This offer was particularly significant because the land would automatically become part of the wilderness when acquired by the government. The Nature Conservancy agreed to buy the land in five separate parcels with the understanding that the government would reimburse it.⁵⁸

Local congressman Jack Kingston opposed the purchase because of the cost to the government. He suggested an alternate solution that would secure the land for the national seashore at no cost. The Candler family had come to regret selling their High Point estate to the government. During negotiations between Greyfield owners and the Nature Conservancy, the Candlers offered to purchase the Greyfield tract and donate it to the national seashore in return for which the government would reestablish their ownership of a plot of equal value at High Point. On June 23, 1998, Kingston submitted in congress a bill called "The Cumberland Island Preservation Act" that would provide funds for the restoration of Plum Orchard and other historic structures, approve the land swap between the Candler and the Greyfield groups, cherry-stem the main road, and add the land and marsh on the south end of the island to the wilderness. The bill exactly matched the proposals of the island residents.⁵⁹

The reactions to Kingston's bill were predictably diverse. Island residents, naturally, were elated. Seashore officials, who had not been consulted, were caught completely off-guard, and they opposed it. Environ-

mental organizations were furious at what they saw as a betrayal of the collaborative process worked out during the meetings over the past year. Georgia senator Max Cleland also opposed the bill, citing the fact that the Nature Conservancy had completed three of the five phases of land acquisition, and had options on the remaining 575 acres. During the ensuing months, the two legislators negotiated to find a solution. Hoping to break the deadlock, National Park Service Director Robert Stanton and Assistant Secretary of the Interior Donald J. Barry visited the island and agreed to divert funds from other programs and parks for historic resource preservation at Cumberland Island.⁶⁰

In late November, Senator Cleland and Congressman Kingston announced their mutual stand on the Cumberland Island issues. Their letter committed the Park Service to allocate \$1 million to rehabilitate Plum Orchard mansion, \$500,000 for other cultural resources, and \$50,000 for new interpretive exhibits. Cleland and Kingston also promised to increase the seashore's annual base funding for historic maintenance by \$300,000. In addition to these welcome increases for cultural resources, the legislators promised that congress would release \$11.9 million for land acquisition. These funds, coupled with a \$6 million donation by the Nature Conservancy, would complete acquisition of the Greyfield tract. However, they placed conditions on the disbursement of the funds. The Park Service and all its many interest groups had to settle the issues of maintenance and visitor access to Plum Orchard and the Settlement. 61

During the next two months, senior Department of the Interior officials worked with all the parties to reach an agreement. On February 17, 1999, fourteen organizations representing the various advocacies, the Carnegie and Candler heirs, and representatives of the senator and the congressman signed a "Cumberland Island Agreement." It provided much more money for historic preservation and land acquisition, but ordered the Park Service to use the main road for historic maintenance and tours of Plum Orchard and the Settlement, to create a wilderness trail parallel to the road, and to develop a wilderness management plan. 62

This sweeping document would have been unusual at any national park unit. At Cumberland Island, it was little short of miraculous. The key factor was linking land acquisition to vehicle use on the main road in the wilderness. Within weeks, however, ominous signs appeared. Another environmental organization, Wilderness Watch, announced that it did not approve of the stipulation that the Park Service should take visitors to the historic sites by vehicle through the wilderness. Then, citing similar concerns, the Defenders of Wild Cumberland reneged on their commitment to the agreement.⁶³

In spite of these threats to the hard-won agreement, Park Service officials continued to carefully develop a draft wilderness-management plan. At the same time, the agency sought to establish the legal and scientific grounds to support its preferred alternatives. The solicitor's office under-

took the most complete and detailed review of retained rights agreements ever compiled to determine who had rights to different uses and activities and who did not.⁶⁴ The Park Service released its draft wilderness management plan on December 15, 2000. The agency's preferred alternatives for the wilderness included use of motor vehicles for ranger patrols, one seaturtle-monitoring trip per day, and, on rare occasions, for maintenance of roads, bridges, and historic structures. The agency also proposed to build a loading ramp at the Plum Orchard dock, a new dock at the north end near the Settlement, and a hiking trail parallel to the Main Road, and to start visitor tours by boat. Planners also asked island residents to "voluntarily" give up driving on four roads east of the main road.⁶⁵

Between December 2000 and July 2001, the National Park Service held eight hearings and received more than 3,500 letters and electronic mailings. The main environmental groups decried all vehicle use in the wilderness. Residents and historic preservationists suggested that the Park Service should either move the historic structures to sites outside the wilderness or eliminate the wilderness designation completely. 66 As the Park Service fielded these responses, some of its thoughts about the wilderness plan began to change. In 2002, the agency banned their own vehicles in the wilderness except for one or two visitor tours to Plum Orchard each month and for emergencies. Ranger patrols, turtle research, and most historic preservation must take place on foot with "minimum tools." The latter term denotes use of hand implements unless the job is impossible without a machine. Then the job's importance itself must undergo careful review. In 2004 a court decision halted the agency's visitor tours. At present, a bill to remove the Main Road and several subsidiary roads from the wilderness, sponsored by Congressman Kingston, has received bipartisan support from Georgia's congressional delegation. If it passes, it will solve the legal issues but may establish a dangerous precedent for all of the country's wilderness areas.⁶⁷

In the end, the only certainty about the wilderness plan is that it will not stand as proposed. Indeed, Department of the Interior officials ordered the agency to submit a new draft for full public review in 2004. The intensity of public interest, distrust of the Park Service, group self-interest, and philosophical differences are deeply entrenched. The only thing certain about this ongoing planning process is that it will continue to be a source of conflict and lawsuits.

Conclusion

Cumberland Island National Seashore has existed for thirty-two tumultuous years. During that time, a succession of National Park Service officials have struggled to accomplish the three missions of the agency. Devising plans to guide management has been fraught with conflict and cost several officials their jobs. The seashore was originally planned to be

a recreation unit with up to 10,000 visitors per day riding trams and rented horses to three huge beach developments and more than a dozen interpretive sites. In a decade, environmentalists, island residents, and the general public, using the NEPA review process, battered these plans down to an unscientific 300-person daily limit with no special recreation facilities.

At the same time, the Park Service belatedly proposed a wilderness area that Congress established despite the existence of retained estates and driving within its boundaries. Wilderness designation on the northern two-thirds of the island has complicated historic preservation, standard Park Service ranger patrols, ecological research, and fire management. Seashore rangers now patrol on horseback and carry hand tools and building materials for maintenance of historic structures. Meanwhile, the furious debates, recriminations, and lawsuits of the opposing factions have prolonged every planning and decision-making process of the Park Service drastically. One of the most difficult and expensive planning efforts ever mounted by the agency finally resulted in a draft wilderness plan nearly nineteen years after the legislation. Some 3,500 letters representing all the polarized camps in this battle have already forced the agency to start redesigning it. In the meantime, Congress may alter wilderness protection nationwide by cherry-stemming island roads and breaking the remaining area into small, non-contiguous pieces.

The intent of the Wilderness Act of 1964 was to lay aside areas with no roads, no structures, and no use of mechanical devices. The intent of the National Historic Preservation Act of 1966 was to study, classify, and protect historic structures and objects. Many public laws protect the sanctity of contracts including those for retained rights of occupancy and use. On Cumberland Island, all these laws affect the same property. The clash of these different pieces of legislation baffles and infuriates all the interest groups.

The historical geography of Cumberland Island National Seashore provides a compelling example of the conflicts that arise when interest groups envision and then demand their version of a "sacred place." Different categories of resources exist in the same places, especially where settlement and economic development have a long history. Each resource carries a body of regulatory legislation and is supported by an advocacy group. The legal planning process, shaped by the National Environmental Policy Act, allows each group to insist on compliance with the law regarding its favored resource, even when that compliance may weaken or contradict protection of another resource. Some groups have proposed that the entire island become a wilderness area while others want a single island-wide historic district on the national register. The result is a contested landscape that will be replicated with the addition of each new park along the nation's coasts or in the well-settled East.

Notes

- Ronald A. Foresta, America's National Parks and Their Keepers (Washington, D.C.; Resources for the Future, Inc., 1984).
- 2. Lary M. Dilsaver, "Preservation Choices at Muir Woods," Geographical Review 84 (1994): 290-305; Lary M. Dilsaver and William C. Tweed, Challenge of the Big Trees: A Resource History of Sequoia and Kings Canyon National Parks (Three Rivers, Calif: Sequoia Natural History Association, 1990); Lary M. Dilsaver and William Wyckoff, "Agency Culture, Cumulative Causation and Development in Glacier National Park, Montana," Journal of Historical Geography 25 (1999): 75-92; Stanford E. Demars, The Tourist in Yosemite, 1855-1985 (Salt Lake City: University of Utah Press, 1991); Michael J. Yochim, "Beauty and the Beet: The Dam Battles of Yellowstone National Park," Montana 53:1 (2003): 14-27; Michael J. Yochim, "Snow Machines in the Garden: The History of Snowmobiles in Glacier and Yellowstone National Parks," Montana 53:3 (2003): 2-14; Michael P. Conzen, "Heritage Corridors and the New Historic Canal Tourism in the United States," Geographische Rundschau 53:1 (2001): 49-55; Edward K. Muller, "Politics and Parks: The Emergence of the Rivers of Steel National Heritage Area," Paper presented at the 100th Annual Conference of the Association of American Geographers, Philadelphia, Pa., 2 March 2004.
- 3. William Wyckoff and Lary M. Dilsaver, "Promotional Imagery of Glacier National Park," Geographical Review 87 (1997): 1-26; Judith L. Meyer, The Spirit of Yellowstone (Lanham, Md.: Rowman and Littlefield Publishers, Inc., 1997); Terence Young, "False, Cheap and Degraded: When History, Economy, and Environment Collided at Cades Cove, Great Smoky Mountains National Park," Journal of Historical Geography (forthcoming).
- Hal Rothman, The New Urban Park: Golden Gate National Recreation Area and Civic Environmentalism (Lawrence: University of Kansas Press, 2004); Alfred Runte, National Parks: The American Experience, Third Edition (Lincoln: University of Nebraska Press, 1997); Richard West Sellars, Preserving Nature in the National Parks: A History (New Haven, Conn.: Yale University Press).
- National Park Service, "Administrative Histories List," (http://www.cr.nps.gov/history/hisnps/ NPSHistory/adminhistory.htm). Accessed17 August 2004.
- "An Act to Establish a National Wilderness Preservation System for the Permanent Good of the Whole People, and for other purposes." 78 Stat.890. 3 September 1964.
- "An Act to Establish a Program for the Preservation of Additional Historic Properties Throughout the Nation, and for other purposes." 80 Stat. 915. 15 October 1966.
- 8. "An Act to Establish a National Policy for the Environment, to Provide for the Establishment of a Council on Environmental Quality, and for other purposes." 83 Stat. 852. 1 January 1970; Good sources on the National Environmental Policy Act include Council on Environmental Quality, The National Environmental Policy Act: A Study of Its Effectiveness After Twenty-Five Years (Washington, D.C.: Government Printing Office, 1997); and Matthew J. Lindstrom, Zachary A. Smith, and Lynton K. Caldwell, The National Environmental Policy Act: Judicial Misconstruction, Legislative Indifference, and Executive Neglect (College Station, Tex.: Texas A&M University Press, 2002).
- The best history of the years before the seashore was established on Cumberland Island is Mary
 R. Bullard, Cumberland Island: A History (Atlanta: University of Georgia Press, 2003); see also
 Louis Torres, Historic Resource Study Cumberland Island National Seashore and Historic Data
 Section of the Dungeness Area (Denver, Colo.: National Park Service, Technical Information
 Center, 1977).
- Bullard, Cumberland Island, 179-275; see also Nancy C. Rockefeller, "The Carnegies of Cumberland Island," unpublished manuscript in the Georgia State Archives, Morrow, Georgia (1993).
- 11. Information on the sales of land to the National Park Service and retained rights agreements can be found in National Park Service, Southeast Regional Office (hereafter SERO), Lands Division, "Summary of Retained Estates, May-July 2000," available at that office in Atlanta as well as in the Lands files at Cumberland Island National Seashore (hereafter CINS). In addition, the CINS files also contain copies of each individual deed and retained right agreement under "Deeds to the National Park Foundation."
- "An Act to Establish the Cumberland Island National Seashore in the State of Georgia, and for other purposes." 86 Stat. 1066. 23 October 1972.
- 13. "An Act to Establish the Cumberland Island National Seashore in the State of Georgia," section 9.

- 14. Park Service director George Hartzog and his assistants made numerous promises of extensive development at Congressional hearings. See, for example, Hearings Before the Subcommittee on National Parks and Recreation of the Committee on Interior and Insular Affairs, House of Representatives, 92nd Cong., 2nd Sess., Washington, D.C., 20-21 April 1972.
- National Park Service, Master Plan Proposed Cumberland Island National Seashore (October 1971), CINS Library.
- 16. National Park Service, Master Plan.
- Albert F. Ike and James I. Richardson, "Cumberland Island National Seashore Study, Carrying Capacity, Revised." Institute of Community and Area Development, University of Georgia (September 1975): 14.
- 18. Ike and Richardson, "Cumberland Island National Seashore Study."
- 19. "Excessive Tourism Threat to Island?" Atlanta Journal, 5 February 1975.
- National Park Service, "Transcript of a Public Hearing Held on February 4, 1975 at Woodbine, Georgia," CINS Library, 56-57; Robert Stanton to Sam Nunn, Correspondence, 6 December 1974, CINS Central Files, A3815.
- National Park Service, 1977, Draft Environmental Statement General Management Plan[,] Wilderness Study Cumberland Island National Seashore, DES 77-25, CINS Library; National Park Service, 1977, Draft General Management Plan and Wilderness Study[,] Cumberland Island National Seashore, CINS Library.
- 22. National Park Service, "Transcript of a Hearing on the General Management Plan and Wilderness Study on the Cumberland Island National Seashore, September 24, 1977, St. Mary's, Georgia," CINS Library; National Park Service, "Transcript of a Hearing on the General Management Plan and Wilderness Study on the Cumberland Island National Seashore, September 27, 1977, Atlanta, Georgia," CINS Library.
- 23. National Park Service, "Transcript of a Hearing, Atlanta," 64-65.
- 24. National Park Service, "Transcript of a Hearing, Atlanta," 62.
- "U.S. Parks Chief to Study Cumberland Jitney Fight," Atlanta Journal, 14 August 1978; Carol Ruckdeschel to William Whalen, Correspondence, 12 February 1979, CINS Central Files, A3821.
- Cumberland Island National Seashore, Final Environmental Impact Statement General Management Plan[and] Wilderness Recommendation[,] Cumberland Island National Seashore, (December 1980), D-1194B, CINS Library.
- Cumberland Island National Seashore, Final Environmental Impact Statement; Southeast Region Office, National Park Service, "Park Service Nearing Approval of Plan for Cumberland Island," (1981), Press Release in SERO Planning Files under "Cumberland Island National Seashore General Correspondence."
- Robert Coram, "Can Georgia's Island Jewel Be Preserved And Developed?" 7 March 1981, Atlanta Journal and Constitution; "Save Cumberland," Atlanta Constitution, 17 March 1981; "Conservationists Divided on Park Plan," Rome News-Tribune, 17 March 1981.
- 29. G. Robert Kerr, "Conservancy Explains Action," Atlanta Constitution, 13 March 1981.
- Kerr, "Conservancy Explains Action"; Ingle, 18 March1981; Hans Neuhauser, "Wilderness for Cumberland," Atlanta Constitution 20 March 1981; "Cumberland Saved," Atlanta Constitution, 19 March 1981.
- Southeast Region Office, 18 March 1981; G. Robert Kerr, "Cumberland Plan Beached." The Georgia Conservancy Newsletter 10, 1 April 1981.
- 32. Hans Neuhauser interviewed by Joyce Seward, Athens, Georgia, 21 November 1995. Transcript in CINS Archives; Cumberland Island National Seashore, Final Environmental Impact Statement 9; U.S. House of Representatives, Correcting the Boundary of Crater Lake National Park in the State of Oregon, and for other purposes, House Report 97-383, 97th Cong., 1st Sess., 4-5, 10 December 1981; "Island Wilderness Bill Submitted," The Savannah Morning News, 8 October 1981; H.R. 4713, 97th Cong., 1st Sess., 1981.
- U.S. House of Representatives, Additions to the National Wilderness Preservation System, Hearing before the Subcommittee on Public Lands and National Parks of the Committee on Interior and Insular Affairs on H.R. 1716, H.R. 3630, and H.R. 4713, 97th Cong., 1st Sess., Serial No. 97-9, Part IV, 16 October 1981.
- U.S. House of Representatives, Additions to the National Wilderness Preservation System, 85-109.
- U.S. Senate, Cumberland Island National Seashore, Georgia, Wilderness; Committee on Energy and Natural Resources Report No. 97-531, 97th Cong., 2nd Sess., 18 August 1982; "Reagan Signs Bill for Island," Florida Times-Union, 11 September 1982; Neuhauser 1995, 30.

- "Statement by the President," The White House, Office of the Press Secretary, 9 September 1982, CINS Central Files, A4027.
- 37. "Camden Longs for Access to Cumberland," Florida Times-Union, 18 October 1981.
- National Park Service, "Summary of the Revised General Management Plan for Cumberland Island National Seashore, Georgia," 19 November 1981, Copy of Pamphlet in SERO Planning Files.
- "Revised Cumberland Plan Is Called 'The Ultimate,'" Atlanta Constitution, 20 November 1981;
 "Island Revisions Praised," Florida Times-Union, 20 November 1981; William E. Mankin to Robert M. Baker, 13 December 1981. Includes "Comments on Summary of the Revised General Management Plan"; Hans Neuhauser to Friends of Cumberland Island, 16 March 1982, CINS Central Files, A4031.
- 40. "An Act to Establish a National Wilderness Preservation System."
- 41. "Eastern Wilderness Areas Act," 88 Stat. 2096, 3 January 1975.
- 42. G. Robert Kerr, Randy Snodgrass, Don Nixon, and George Songer to Robert Baker, Correspondence, 5 April 1983, CINS Resource Management Files under "Wilderness."
- Roger Sumner Babb to Robert M. Baker, Correspondence, 17 August 1987, CINS Central Files, C38.
- See Cumberland Island National Seashore's Land Protection Plans and updates for 1985, 1986, 1989, 1991, and 1994, CINS Central Files, L14.
- Edwin C. Bearss to Chief of Registration Shull, Interagency Resources Division, Correspondence, 15 August 1984, National Park Service, Park History Office Files under "Cumberland Island"; Bennie C. Keel to Superintendent, Cumberland Island National Seashore, Correspondence, 15 September 1994, CINS Central Files, H2215.
- 46. SERO, "Summary of Retained Estates"; Southeast Region Office, National Park Service, "Draft Minutes of the First Meeting of Cumberland Island-Plum Orchard Friends," 12 September 1983, SERO Planning Files under "Cumberland Island—Plum Orchard"; Cumberland Island Historic Foundation, "Minutes of Meeting of November 18, 1983," November 1983, SERO Planning Files under "Cumberland Island—Plum Orchard."
- Cumberland Island Historic Foundation, "Minutes of Meeting of November 9, 1988," November 1988, CINS Central Files, A3821; Cumberland Island National Seashore, "Staff Meeting Minutes," 25 October 1989, CINS Central Files, A22; Rodney M. Cook Jr. to Rolland R. Swain, Correspondence, 4 February 1994, CINS Central Files, H3021.
- 48. Rolland R. Swain interviewed by the author, Cumberland Island National Seashore, 11 June
- "Artists' Retreat Criticized," Florida Times-Union, 14 March 1995; "A Necessary Evil on Cumberland," Editorial in Atlanta Constitution, 22 May 1995; "Legislator Blasts Park Plan," The Southeast Georgian, 15 February 1995.
- 50. Don Barger to Rolland Swain, Correspondence, 2 March 1995, CINS Central Files, H3021.
- 51. "Artists' Retreat Criticized," 14 March 1995.
- 52. Cumberland Island National Seashore, "Finding of No Significant Impact on Environmental Assessment for Alternatives for Preservation of Plum Orchard Mansion in the Cumberland Island National Seashore between United States of America[,] Department of the Interior[,] National Park Service[,] Southeast Field Area[,] Cumberland Island National Seashore and The Plum Orchard Center for the Arts on Cumberland Island, Inc.," February 1996, CINS Central Files, A64.
- 53. "Defenders of Wild Cumberland, Inc. vs. United States; Bruce Babbit, Secretary of the Interior; Roger Kennedy, Director National Park Service; Robert Baker, Southeast Field Director, National Park Service; Rolland Swain, Superintendent, National Park Service, Cumberland Island National Seashore," U.S. District Court for Northern Georgia, Case Number 1 96-CV-830-ODE, 1996; Robert M. Baker to Ms. Nancy Parrish and Ms. Janet (GoGo) Ferguson, 14 June 1996, CINS Central Files, A22.
- "Davis To Head Cumberland NPS," The Southeast Georgian, 20 November 1996; Thornton Morris interviewed by the author, Atlanta, Georgia, 6 October 1999.
- Cumberland Island National Seashore, "Superintendent's Annual Report 1999," 2000, CINS Central Files, H2621.
- Jennifer Bjork to Workshop Participants, Briefing Statement, 26 May 1998, CINS Central Files, A40.
- 57. "Superintendent's Annual Report 1999"; "Cumberland Island Wilderness Management Plan Forum," Held at Cumberland Island National Seashore, Georgia, 1-3 May 1998, attended by

- the author; "Wilderness Plan Near?" Florida Times-Union, 5 May 1998.
- Cumberland Island National Seashore, "Superintendent's Annual Report 1997," 1998, CINS Central Files, H2621; The Nature Conservancy of Georgia, "Nature Conservancy Negotiates a 4-Year Purchase Plan to Protect 1,148 Acres on Cumberland Island," The Nature Conservancy of Georgia Newsletter, Spring 1997.
- Jack Kingston, "Kingston To Introduce Cumberland Preservation Act," 23 June 1998, News Release in CINS Superintendent's Office Files; "Kingston Plan Divides Factions," Florida Times-Union, 12 July 1998; H. R. 4144,105th Cong., 2nd Sess., 25 June 1998.
- Denis Davis to Jack Kingston, Correspondence, 17 July 1998, CINS Central Files, W38;
 "Kingston Plan Divides," 12 July 1998; "Superintendent's Annual Report 1999"; Robert Stanton to Max Cleland, Correspondence, 2 December 1998, CINS Central Files, A98; "Park Service, Lawmaker at Odds Over Seashore," Atlanta Journal and Constitution, 11 December 1998; "Island Issues on Tap," Florida times-Union, 13 December 1998.
- "Funds for Land Cleared," Florida Times-Union, 22 December 1998; Max Cleland and Jack Kingston to Don Barry, John Berry, and Robert Stanton, Correspondence, 25 November 1998, CINS Superintendent's Office Files.
- "Superintendent's Annual Report 1999"; Cumberland Island National Seashore, "Final Agreement," 16 February 1999, CINS Management Specialist's Office Files.
- Andy Ferguson interviewed by the author, St. Mary's, Georgia, 2 July 2001; "Superintendent's Annual Report 1999."
- Andy Ferguson interview, 2 July 2001; Arthur Frederick interviewed by the author, St. Mary's, Georgia, 2 July 2001.
- Southeast Region Office, National Park Service, Draft Introduction to Planning Effort and Environmental Impact Statement for the Wilderness Management Plan, Long Range Interpretive Plan, Commercial Services Plan, Resource Management Plan (Cultural and Natural Resources), Three volumes with Appendices (December 2000), CINS Superintendent's Office.
- Arthur Frederick interview, 2 July 2001; Richard Sussman telephone interview by the author, 13 July 2001; Southeast Region Office, December 2000.
- Richard Sussman interview, 13 July 2001; Andy Ferguson, telephone interview by the author, 17 March 2003.