

**To: Professional colleagues with the National Association of Recreation Resource Planning**  
**From: Ken Cordell, Forest Service R&D, Athens GA**

**Introduction.**—Below you will find my review of a public draft of the Conservation Plan for Jekyll Island State Park. Should you be interested, the plan draft can be found at (<http://www.jekyllisland.com/LinkClick.aspx?fileticket=rdIaZ7DT2ws%3d&tabid=315>). The Jekyll Island State Park Authority contracted a consulting firm to carry out this conservation planning project. Jekyll Island State Park is a barrier island near Brunswick, Georgia, with land area of approximately 4,000 acres. The east side is open ocean beach and the west side is marshland. By law, only 35 percent of the JISP land area can be developed. The remaining 65 percent must be left undeveloped and conserved.



View from front of the Jekyll Island Club Hotel.

I sent my review to both Bob Manning (U. Vermont) and Glenn Haas (CSU and NARRP Board) to get their reactions. I sent it to them because I used the principles for park and recreation planning provided by the National Association of Recreation Resource Planners (NARRP) as a framework. Dr. Haas has been a principal contributor to development of these principles and to the NARRP sponsored monograph on refinement of carrying capacity methods. Dr. Manning has been a principle contributor to the NARRP and other efforts to refine carry capacity analysis as a planning tool. My question to them was “*whether my review of the Jekyll Island State Park*

*Conservation Plan properly reflected in general the NARRP planning principles and also the concept of carrying capacity in park planning and management.*

I must say that I greatly admire the work these two and several others have done to advance professionalism through development of the NARRP planning and capacity principles. I particularly appreciate the definition from the NARRP web site that indicates that “Recreation planning is a rational, systematic decision-making process, and as such it is a fundamental tool that deters our human tendencies to make decisions based on predisposition, bias, inadequate analysis, group-think, insular perspectives, resistance to change, and excessive self-confidence. It results in decisions that are more effective, efficient, fair, reasoned, and defensible.”

Because of the number of definitions and principles on the web site, I chose to frame my comments and recommendations around some, but not all of the NARRP Principles. The ones chosen are quoted below (in italics) and are followed with my comments concerning the Jekyll Island State Park conservation plan. While these principles frequently refer to recreation planning, I understand that the intent of the NARRP principles is that they apply equally to any form of park planning, park conservation planning included. I chose to frame my comments regarding visitor capacity (sometimes referred to as carrying capacity) in light of the NARRP monograph entitled *Capacity Reconsidered: Finding Consensus and Clarifying Differences* (Capacity Working Group 2010).

I am submitting my review to the Newsletter in order to share with you an application of the NARRP Principles to an actual planning process that is underway. I let the Jekyll Island State Park Authority and their consultant with AECOM know in advance I was going to do this. I will as well send my review to other organizations as appropriate, such as the NASPD. I see this review as an excellent opportunity for us as colleagues, for students and for planners in general to examine the usefulness of the NARRP principles and the capacity tool.

My comments were and are meant to provide a constructive perspective and to remind all of us of the importance of our commitment to rigorous and open public land planning and management. A cornerstone of that commitment is to put the interests and active involvement of the public front and center from beginning to end in execution of any public planning process. In my opinion, the NARRP Principles are extremely well done and reflect a deep understanding of the importance of professional planning values and approaches. I found that in using these principles as a framework for reviewing the JISP conservation plan, a number of needed improvements came to light that might not otherwise have been noted. I submitted my review in two parts, included below. First presented are selected key principles with my comments. Secondly presented are selected key elements of the Capacity Working Group’s Capacity Reconsidered monograph.

### **What is happening now?**

In response to widespread interest in and concern about Jekyll Island State Park planning and to the well over 250 comments and reviews sent regarding the first public draft of the JISP Conservation Plan, a revised timeline was developed (shown below). In contrast to the procedure for the first public meeting held in December (before which no documents were made available

for pre-meeting review), this revised schedule will make a draft available before the March 25 public meeting. At the recommendation of a number of interested professionals and the general public, all comments have been posted on the Authority Web site. Prior to the high volume of public comments, completion of the conservation plan was on a fast track. These comments can be seen at <http://www.jekyllisland.com/Revitalization/ConservationPrograms.aspx>. A number of the reviews raised concerns about the lack of financial and staffing commitment to the plan and about a number of other highly important plan components not covered. Some of these are mentioned in my review below. Again using the NARRP Principles, a second review of the redrafted Plan will be prepared. Both Drs. Haas and Manning confirmed that my use of the NARRP principles to organize a plan review and guide comments was appropriate and professionally done.

#### New Timeline for Completion of Conservation Plan

- February 11th – Deadline for public comments on the January 4 draft (Complete)
- February 18th – Public comments, committee notes and summary to be posted to website (Completed)
- March 7th – Revised plan draft posted online
- March 25th – Public meeting
- April 1st – Deadline for comments on March 7th draft, and comments from public meeting

#### Next Steps after April 1st:

- Complete plan draft
- Committee Review
- Present to Jekyll Island Authority Board of Directors at a public board meeting

As the Conservation Plan (CP) is in what appears to be its final phases, the JISP Authority is moving rapidly toward Master Planning. As with the CP, development of the master plan is being contracted to a private consulting firm. I and others concerned for the future of JISP will become as engaged as possible in the MP process and will share the NARRP Planning Principles with all involved. If the Authority and its consultant are open to it, this will provide an excellent opportunity to put the Principles to work in the beginning of a plan process. Unfortunately, the first opportunity to do so has passed, that is, an opportunity to engage the public in design of the public input and planning process itself.

#### **Letter and Review submitted to the Jekyll Island State Park Authority Conservation Plan Committee Chair, February 7, 2011.**

To: Dr. Terry Norton  
Jekyll Island State Park Authority  
100 James Rd.  
Jekyll Island, Georgia 31527

From: H. Ken Cordell, PhD  
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Southern Research Station  
USDA Forest Service  
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Dear Dr. Norton:

I am writing to provide comments concerning the January 4 draft Conservation Plan for Jekyll Island State Park. I have grounded my review in the principles for professional park and recreation planning provided by the National Association of Recreation Resource Planners (NARRP). I have sent my comments to two prominent contributors to development of those principles. I have asked Drs. Manning (U. Vermont) and Haas (Colorado State U.) for their observations regarding my application of the NARRP principles in reviewing the JISP conservation plan. These two individuals are very highly regarded in the natural resources planning field. They are, in fact, among the pioneers in this area. One aspect of planning they have pushed to a high level sophistication is the concept of capacity, which I also address below.

My comments will ultimately be submitted for publication through the NARRP organization and through other organizations, such as the National Association of State Park Directors. The JISP conservation plan is a good case example for the planning community. One of the most fundamental of public land planning principles is commitment to putting public interests and active involvement front and center from beginning to end. By holding the plan up to the light of the Principles and the park capacity guidelines, I was able to see a number of ways the conservation plan could be strengthened.

**NARRP Planning Principles and My Comments (Ken Cordell, USDA Forest Service, Athens GA, February 7)**

*A Contract with the Recreating Public: A ... plan is a contract with the ... public and affected stakeholders that transcends any one person or administration, and as such should be detailed, unambiguous, and provide for accountability.*

Cordell Comment.—The introduction to the plan states that “The intent of this Plan is to create a framework for protecting and managing natural resources on Jekyll Island (State Park). It is not the final story for conservation; instead, it is a prescription for a long-term (100 year) approach to protect the sensitive environments of this barrier island. The Plan is expected to be clarified, refined, ....”

While I like the wording regarding intent in general, throughout the Conservation Plan (CP) I am left wondering “What is the level of commitment, and is that commitment at the level of a contract”. As I understand the guidance from the NARRP Principles, a budget and commitment to a plan as if it were a contract is essential. Frequently, words or phrases such as may ..., opportunities to ..., etc. are used. Thus, I recommend that the Jekyll Island State Park (JISP) CP be more concrete in setting out the need for and commitment to funding, staffing and other resources for achievement of stated objectives. I also recommend that the conservation plan not be advanced until there is a commitment to a budget and other necessary resources.

*Represent the Public Interest: Recreation resource planning is a collaborative public process that deters the bias of special interests, political intervention, or incremental unplanned decision making.*

Cordell Comment.—The planning process for the Jekyll Island State Park has by all appearances been a closed process. For the most part, input was limited to that of members of a committee selected by the Jekyll Island State Park Authority. Some of the members are actually JISP Authority staff directors. Public involvement in helping to define the planning process itself seemed especially missing. As I understand it, public land planning of any kind should engage the public at the very beginning and it should represent the full scope of public and stakeholder interests, especially the interests of general citizens and visitors. I recommend that a survey of public and visitor interests and preferences for management of Jekyll Island State Park be conducted. I recommend that finalization of the current CP be put on hold until the public's interests are clearly understood and taken fully into account. This would need to involve surveying both visitors and Georgians generally. In any surveying, or other form of citizen engagement, great care should be exercised that opinions and values of all segments of Georgian society be represented.

*Recreation Diversity: Because there is no “average” recreationist, it is important to plan for and maintain a spectrum of diverse recreation opportunities.*

Cordell Comment.—The recreation plan section of the CP acknowledges existence of a variety of recreation resources on JISP and interests among Georgians. This variety of resources and interests ranges from beach to golfing to biking opportunities. Given that nature-based tourism and recreation is one of the 4 primary focus areas identified by the CP, it seems that a broader based and more in-depth consideration of opportunities are both appropriate and necessary. The only in-depth consideration of opportunities is expansion of the trail system. No other alternatives are identified or considered. JISP can offer a broader spectrum of nature-based recreation opportunities, some of which are unique. It is my recommendation that a broader spectrum of recreation opportunity alternatives be identified through aggressive involvement of current and potential new visitors to this island state park. This would help assure a broader representation of interests across the diversity of Georgia Citizens and would build greater trust in JISP management. As a significant assurance step, I recommend that a rigorous Civil Rights Impact Analysis (CRIA) be conducted to assess any possibilities of discrimination or favoritism.

*Systems Approach: Resource planners must consider how their resources fit into a larger regional system, how their potential ... alternatives might contribute to regional recreation diversity, and how their opportunities can be linked to larger systems.*

Comment.—I was delighted to see that in Section 3.2 a regional context was introduced for JISP conservation planning. This regional context did not, however, seem to play a noticeable role in shaping the CP analysis and conclusions. Consideration seemed focused on resources within the borders of the island itself. Similarly, the nature-based recreation and environmental education components of the CP did not address the JISP position among and relationships with (e.g.,

complementarity) the broader system of public and private park, recreational and educational resources in coastal Georgia. It is my recommendation that these other resources be identified in a systematic way and that beneficial relationships be integrated into plans for JISP. Given the sagging state and local budgets of governments over the last few years, it seems that a regional systems approach would be much more efficient. It seems that a study is needed to identify how decisions regarding JISP might compete with or complement off-island public or private interests.

*A Process: While the specific terms and steps in a ... planning process often vary across institutions, all recreation resource planning in some manner includes:*

- *Identification of public issues, management concerns, opportunities, and threats through collaborative stakeholder involvement.*
- *Establishment of planning and decision criteria for evaluating and selecting the preferred alternative.*
- *Inventory of resources, the current situation, and the best available science and information.*
- *Formulation of alternatives which address the significant issues and concerns.*
- *Evaluation of the consequences, benefits, and affects of each proposed alternative.*
- *Selection of a preferred alternative based upon a full and reasoned analysis.*
- *Implementation and monitoring.*
- *Plan adaptation or revision.*

Comment: The Jekyll Island State Park CP document is well written and does address in some ways portions of the above 8 components of planning. However, the planning process seemed to exclude some key Jekyll Island stakeholders in development of drafts of the CP (bullet No. 1). While a planning committee was named, that committee is not broadly representative of the diversity of stakeholders with interests in the future of JISP. Missing generally, and especially in the recreation and environmental education portions of the CP process, were the voices of average Georgians who visit, recreate on and learn from experiences at the Park. As well, the CP did not seem to take into account the values and preferences of Georgians who may never visit the park. Four of the 8 plan components listed above explicitly refer to alternatives. Missing from the JISP CP was reference to and consideration of alternatives for addressing nature conservation, recreation and environmental education issues and concerns. Only one management scenario was offered. Needed in the CP is a range of reasonable alternatives with a rigorous evaluative comparison of their costs, benefits, effectiveness and effects. I recommend that more complete spectrum of alternatives be developed through full involvement of Georgia public stakeholders and that the CP be enhanced and redrafted accordingly.

*Planning Inputs: Resource planning requires the consideration of many inputs such as an inventory of existing plans and policies, current type and amount of recreation use (supply and demand), recreation trends, public issues, management concerns, regional supply of recreation opportunities, visitor and stakeholder preferences, economic impact of recreation participation, best available science, environmental conditions, and available information from recreation and resource monitoring.*



Comment: The JISP CP could benefit significantly by explicitly including the above listed critical planning inputs. In addition to inclusion, a thorough description of how these inputs are used in analysis and decision making will help citizens, stakeholders and officials understand the rationale for selection of the best management course. JISP is not only a resource of statewide significance, but it is also a regional resource drawing visitors and citizen interests from a number of nearby states. Jekyll Island is also of vital interest to the science community, particularly scientists studying bird migration, marsh ecology, wetlands, sea turtles, and barrier island geology. I heartily recommend that the above list of inputs be fully and seriously taken into account and that the CP with its recreation and environmental education components not be finalized until these inputs are fully considered through a rigorous comparative analysis of alternatives. Numerous informed professional sources exist (e.g., Manning 2009). These include the Georgia SCORP, trend and forecast demand data from the National Survey on Recreation and the Environment (Cordell et al 2004), trend data from the Fish and Wildlife Service and the Outdoor Foundation, numerous applicable visitor surveys (including some done for JISP), recreation resource inventory methods, economic impact studies at the University of Georgia and its partner the Southern Research Station, widely published social science methods for assessing public land value trends, and state of Georgia and other state strategic plans. It is recommended that experts familiar with these and other relevant systems of data and planning methods be engaged in revisiting the CP process and its science foundations.

*Recreation Resource Publics: Recreation resource planning must try to engage and hear from all the diverse publics who value the ... resource. The easily recognizable publics are often labeled visitors, local business, land owners and communities, but there may also be equally important publics who vicariously value the resource, some who have been displaced by past unacceptable conditions, some who do not have the ability to attend meetings, or some who live across the country, but equally share in the ownership of the public resource. **and** Collaboration: The meaningful engagement and exchange with the public is essential throughout the planning process. Collaboration results in a clearer definition of public values, more creative alternatives, more reasoned and reasonable decisions, and a constituency that becomes better informed and committed to the plan and its implementation.*

Comment: To some extent, the CP was informed by public concerns and values through the CP Committee. Two of the committee members represent Georgia conservation organizations. However, visitors, local business, and the public at large across the state clearly did not have a voice in development of the CP for this citizen-owned state park. The natural character of Jekyll Island State Park is the park's primary resource and the reason the island is so popular and scientifically significant. The CP committee and its consultant kept development of the plan closed until a full draft had been prepared. The public had little voice in establishing a shared vision and the primary thrusts of the plan. After completion of a draft, public input sessions were scheduled, but were held at such times that few Georgia citizens could attend. For example, the next public meeting was scheduled for February 23 on Jekyll Island, a Wednesday. I recommend that both a statewide public survey and public input sessions in other locations be held before the CP is taken further toward completion. These steps would greatly improve the representativeness of Georgians' values in the plan and build greater trust in the planning process, the planning officials and the plan recommendations. In addition, I recommend that a stronger commitment to collaboration with the public be undertaken. For example, any citizens who volunteer to assist

with aspects of the planning process should be welcomed and engaged readily. This has not often been the case. Trust can be eroded when planning is a closed process.

*Comprehensive and Integrated: Recreation planning should consider other significant natural and cultural resources, uses, demands, and values in an integrated and comprehensive fashion. Functional planning, whereby one resource is planned for in a vacuum from other resources, is not appropriate and is contrary to comprehensive and integrated planning.*

Comment: Integration of all planning for JISP can greatly benefit decisions and future management of this important state park. Integration should include all conservation planning, development planning currently underway or being implemented, master planning, fiscal planning, partnership planning and any other planning. Currently these planning components do not seem to be connected, nor are they open processes. Construction of large-scale projects is underway and other construction is being planned without the benefit of a conservation plan, public participation, or a comprehensive examination of alternative futures for island management. I recommend that all planning be integrated and that a comprehensive range of management alternatives be considered. The conservation plan should not be finalized until it becomes a closely integrated component of comprehensive planning.

*Clear Management Alternatives: Management alternatives must be clear, comprehensive, and provide a reasonable range of choices for public consideration. Each alternative can be contrasted by its proposed objectives, desired future conditions, desired recreation experiences, facilities, management strategies and actions, quality standards, visitor capacities, economic value, projected budget requirements, and monitoring program. **and***  
*Rigorous Analysis: The analytical stage in a planning process is the evaluation of alternatives whereby the alternatives should be sharply contrasted, and the pros and cons are rigorously evaluated so the reasons for and against each alternative become clear.*

Comment: The conservation plan for JISP offers no alternatives for future resource management and nature protection. Resources for public land management are and will always be limited and scarce. Specifying a reasonable and well balanced range of choices for public consideration is in keeping with widely respected public land conservation planning principles. Subjecting such a range of alternatives to rigorous analysis is in the best interest of management, the public and the resource. As earlier stated, no alternatives for resource conservation on JISP were identified, and since there were no alternatives offered, no rigorous analysis was conducted.

*Budgetary Tool: An effective recreation plan should include projected budgetary needs to implement the plan. In this way, the plan is a tool to prepare and justify annual budgets, for allocating budgets, and to guide annual work priorities, and facilitate the scheduling and sequencing of projects.*

Comment: The JISP conservation plan omitted inclusion of a projection of budgetary needs. Without a budget needs projection, it will not be possible for the JISP Authority and its board to rationally consider the conservation plan in whatever form it is finally submitted. As it stands, it is entirely possible that the conservation plan and its objectives and strategies will enter decision making as less than a full partner in management. I recommend, as an essential step in planning,



that a needs budget be developed, hopefully across a respectable range of alternative future management scenarios. It is difficult to understand how a plan can be considered without knowing its costs relative to its effectiveness.

### **Visitor Capacity as an Essential Ingredient of Conservation Planning**

*A capacity is a decision about a reasonable number of recreation opportunities that will be managed for which is consistent with and helps achieve the full management prescription for an area. **and***

*There is no single absolute, maximum, or correct capacity number, or estimate thereof. There is a range of reasonable capacities whose merits are rigorously evaluated across the alternatives during a planning process. (Haas Perspective in Capacity Working Group 2010).*

The following are direct quotes from the Capacity Working Group's Capacity Reconsidered Paper (2010). This paper and the international experts who wrote it represent the state of the art in definition and guidelines for application of carrying capacity analysis as a tool in public land, park and recreation planning.

*The role of capacity in planning changed with the advent of new natural resource decision-making processes in the late 1960s. Management professionals and the public increasingly recognized that resource degradation, resource scarcity, competing demands, changing and conflicting public values, and limited management resources needed to be addressed in a comprehensive and integrated manner, and that resource uses might have to be limited to ensure quality.*

Cordell Comment: Jekyll Island State Park is a major destination and favored island environment for nature-based recreation and tourism. The draft JISP conservation plan identified the following goal and objectives:

“One of the goals from the 2009 Conservation Strategy relates to recreation on the Island with the mission of providing a high quality, nature-based recreational experience and environmental education for the general public. It has the following objectives and proposed actions:

**Objective:** Provide well-planned public access to natural areas of interest in a manner that:

- Protects specific natural resources and habitat integrity
- Protects the Island's sensitive areas and wildlife
- Provides a quality natural history educational experience that integrates the Island's natural communities
- Increases visitor enjoyment
- Brands Jekyll Island as a premier nature-based coastal recreational destination”

This stated objective is admirable. It is imperative that Jekyll Island State Park play a major role as a provider of quality recreation in Georgia, and more generally in the Southeast U. S. However, very little is provided in the way of management prescription and standards to guide achieving the objective and its components of protection and quality visitor experiences. These concepts are not defined, nor are alternative goals and objectives provided and evaluated. Needed in the recreation section of the conservation plan analysis is a rigorous analysis of recreation visitor capacity that is internally consistent with stated resource conservation and protection goals and

objectives. The conservation plan leadership had been briefed and subsequently given written information on availability of long-standing planning principles and methods, including visitor capacity analysis.

*“Recreational carrying capacity” received considerable research attention starting in the 1960s, leading to the notion that capacity has both environmental and experiential dimensions. Visitor use can affect biophysical resources such as soils, vegetation, water, and wildlife, and it can degrade the quality of visitor experiences through crowding, conflicting uses, or aesthetic impacts on the environment.*

Comment: Visitor capacity in planning is a well researched and widely applied tool in park and recreation planning. Methods for analyzing and specifying capacity or indicators and standards are easily obtainable. Absence of consideration of visitor capacity at Jekyll Island State Park represents to me a fatal flaw in conservation planning for this park. Throughout this conservation plan, much information and discussion is devoted to the subject of protecting soil, vegetation, water and wildlife conditions. Noted in a number of places are aspirations to serve as a provider of high quality nature-based recreation opportunities and experiences. It is recommended that visitor capacity be fully integrated into the planning process and that the next draft of the conservation plan provide specific capacity prescriptions for a well analyzed preferred alternative.

Visitor or carrying capacity in park, recreation and public land planning is very well researched tool. A number of approaches exist that are readily adaptable to a setting such as a barrier island state park. I strongly recommend as a starting point for revision of the conservation plan, that the planning committee and the AECOM consultant obtain and read the NARRP planning principles and the Capacity Working Group paper on Capacity Reconsidered. There is broad-based professional consensus that the principles and the associated paper on Capacity Reconsidered represents the state of the art in planning. Without fully analyzing Jekyll Island’s visitor capacity, it is difficult to judge now, or determine in the future if the following stated description is accurate: “The Island’s existing overall resource-based recreation system is well used and well designed. The interconnected network of loop trails, numerous access points and picnic areas, and wide variety of recreation types create a successful recreational system that provides users of all ages and skill levels access to the Island’s unique natural and historic resources.”

*Capacities are a common “management tool” used by many local, state, and federal agencies (Brown 2001) and the topic has been the subject of several national conferences and a Federal Interagency Task Force (2002). .... Capacities have been widely applied in diverse recreation settings (e.g., rivers, lakes, trails, backcountry areas, mountains, and islands) to protect natural, cultural, and experiential resources; help define the appropriate size and type of facilities (e.g., campgrounds, marinas, boat launches, trail and transportation systems, and visitor centers); shape the size of agency programs (e.g., interpretation, maintenance); and determine appropriate levels of commercial and non-commercial uses.*

Comment: There are numerous examples of applications of capacity analyses for management and planning of parks. These could prove highly valuable in furthering the depth of the JISP conservation plan. Properly done, a capacity analysis would be useful in defining and

quantifying concepts such as “successful”, “better access” and “new experiences” as used in the following quote---“Although the existing trail system is successful overall, there are several additional paved and unpaved trails that could provide better access, or new experiences on the Island.” As described in the Capacity Monograph, capacity is as much about visitor experiences as it is about protection of natural and cultural resources.

*The analytical focus of public planning processes is developing and evaluating a range of management alternatives. Each proposed alternative offers a different combination of management goals, objectives, resource uses and values, management programs and actions, indicators/standards, affected environment, capacities, and budget/personnel requirements which produce different sets of consequences. Because each alternative has a different management prescription, each has a different capacity.*

Comment: In the recreation portion of the conservation plan, no management alternatives are presented. There is only one management scenario described throughout the plan. Much needed for public consideration and for consideration by the state park Authority Board is a reasonable range of alternatives. Accompanying these alternatives would be a full description of goals, objectives, values represented, indicators, capacities and budgets. Without alternatives, there is little way that future options can be considered and a suitable superior future for park management selected. For example, what would Georgia citizens of average means prefer more, a mostly natural island with traditional lodge and cabin accommodations, or a more developed island with multi-storied hotels and choice eating establishments? Visitor capacities and management prescriptions would vary accordingly.

*Through the planning process, decisions are made about the recreational opportunities to be provided in harmony with other resource values and uses. The overarching goal is to ensure the protection of natural, cultural, and experiential resource values, and this is achieved through a management prescription that links management actions to management objectives, desired conditions, and standards. **And***

*Meeting a capacity by managing the type, amount, and location of recreation use may be an effective tool for achieving certain objectives, but ineffective for others. Impacts are not always related to the number of users, or may be strongly affected by other factors (e.g., poorly designed or built trails, unauthorized use, inconsistent tourism marketing...)*

Comment: The data compilation section of the conservation plan notes that “The Plan consists of documentation of data compiled on natural resources in Georgia through written text, appendices, and references to websites where data on sea turtle nests, bird banding stations, NatureServe research, etc. is regularly updated. It also includes a new process for assessing projects that could impact natural resources called the Environmental Assessment Procedure.” While the plan is rich in information listings existing natural systems and species of flora and fauna, it lacks data on public resource values, preferred recreation experiences, visitor identity, and other social dimensions of island use and clientele. These types of data are critically needed to aid in managing recreation and other uses in ways consistent with the overarching goal of park management, that is, ensuring the protection of natural, cultural, and experiential resource values.

*... a capacity is ... specified by units of use, time, and location components (e.g. float trips per day leaving the put-in, backpack trips per day entering the backcountry, people at one time using an interpretive center, cars or buses at one time in a parking area). .... Capacities are a fundamental planning and management tool .... Some of the multiple purposes and values to managers, the public, and the private sector include:*

- a. help ensure that use levels do not degrade ecological, cultural, or experiential resources and values;*
- b. provide clarity and predictability for concessionaires, local businesses, and communities;*
- c. enable best-business practice of demand/supply analysis;*
- d. improve the clarity and comparability of management alternatives in a planning process;*
- e. help plan and design recreation and administrative facilities, infrastructure (sewer, water, electricity), transportation routes and systems, and other built environments;*

*It is important to address capacity proactively before impacts become unacceptable, irreversible change occurs, or conflict and contentiousness develops among stakeholders. If possible, managers should prescribe which management actions they will employ if parts of the management prescription are violated, particularly if direct use limits are contemplated. Restrictions or allocations may be more readily accepted by users or stakeholders if they are prescribed before they need to be implemented.*

*... indicators are variables selected to represent natural and cultural resource, experiential, or managerial conditions in a recreation setting. Standards define thresholds for those indicators; they “draw the line” between “acceptable” and “unacceptable,” “desirable” and “undesirable,” “high quality” and “low quality,” depending upon the situation. In the preferred alternative, choices of standards are based on sound professional judgment that considers:*

- a. the legal environment, including laws, policies, and regulations;*
- b. current resource and social conditions;*
- c. administrative feasibility such as available personnel and funding (can actions be taken to meet the standard?);*
- d. public acceptability (will stakeholders or the public support management actions given tradeoffs with other values?);*
- e. costs and benefits associated with planned management actions;*
- f. supply and demand of regional opportunities;*
- g. uniqueness of opportunities;*
- h. risk of irreversible change, and*
- i. impacts on all resources, including T&E species, fragile cultural or biological resources, and non-recreational uses.*
- j. science-based information about the sensitivity of resources and recreation experiences, the relationships between visitor use and impacts, and public values and preferences.*

Comment: In my view, consideration of natural resources and visitor and other uses are inseparable in planning and management prescriptions. A primary point of the NARRP principles and capacity documents is that planning should not be done in pieces. Adoption of a

conservation plan in the absence of other elements of comprehensive planning, especially in the absence of visitor capacity and potential use impact considerations, may well leave protection of marsh, forest, beach, dune, and other resources isolated in future management. It is recommended that resource conservation planning be integrated with other elements of comprehensive planning (e.g., fiscal, development and tourism). This implies not giving a final approval to the plan as it currently stands, but continuing to build upon the structure thus far created and adding alternatives and a strong element of capacity analysis.

The following is quoted from Manning's Perspective on Visitor Capacity in park planning (Capacity Working Group 2010).

*Formulation of a visitor capacity should represent a **strong commitment** by management agencies. A visitor capacity is based on an explicit statement of the resource and experiential conditions to be provided, and management agencies should maintain these conditions. Addressing visitor capacity is a long-term and continuing process. Once visitor capacity has been estimated, use levels and indicators and standards must be monitored and management actions taken to ensure that 1) standards are not violated and 2) management actions are effective.*

From the above perspective, it is clear that Jekyll Island State Park management through its JISP Authority needs to make a commitment to recreation management that takes into account both the protection of the conditions of the natural resources of the island and of recreation experiential conditions. In order to make such a commitment, implementation of state-of-the-art planning principles in visualizing and analytically comparing alternative management futures, including visitor capacity analysis, is going to be needed. Planning that lays out no alternatives to consider and presents no cost-benefit comparisons could lead to decisions that are based on predisposition, bias, inadequate analysis, group-think, insular perspectives, resistance to change, or excessive self-confidence. The planning process followed thus far has been far less than an open and inclusive one. It is highly recommended that all future planning be comprehensive (not compartmentalized) and that it be publicly inclusive and open.

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