

NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations

Testimony of Denis Galvin

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On behalf of

Board of Trustees, National Parks Conservations Association

To discuss proposed revisions to

The National Park Service Management Policies

and

Director's Order 21

Before the House Subcommittee on National Parks

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Mr. Chairman, and other distinguished Members of the Subcommittee; it is a pleasure to be before this Subcommittee again. As you know, I recently retired from the National Park Service after a 38-year career, during which I served as, among other positions, park engineer, manager of the professional architecture and design center, associate director, and deputy director. I have actively participated, as a career professional, in the agency's interpretation and implementation of the 1916 NPS Organic Act, and all of the other laws given to the NPS to carry out, at the field, regional, and headquarters levels on a day-to-day basis for more than three decades, including development of the 1988, and 2001 editions of *NPS Management Policies*, the official manual that guides the agency's day-to-day work under these laws. I am also intimately familiar with the issues associated with Director's Order 21 on the role of philanthropy in the national parks, revisions to which have also been proposed.

As is valid for all public laws and all public agencies, it is appropriate for this Subcommittee to exercise its oversight responsibilities to assess periodically how the National Park Service is doing in carrying out the statutory mandates that it has been given by the Congress and Presidents, and NPCA is pleased to play a role in supporting that effort on your part. We welcome your oversight, but strongly believe that the Administration has shown NO need for the broad and comprehensive changes that they propose to make in *NPS Management Policies*. NPCA remains enormously concerned about the proposed rewrite, as do the many thousands of Americans who have submitted comments on the policies so far. NPCA has submitted comments to the Park Service regarding the proposed revisions to DO-21, and we are providing a copy of those comments to the subcommittee with our testimony.



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The 1916 Organic Act as the Guiding Tenet

The fundamental re-interpretation of the Organic Act that is being proposed in the rewrite of the *Management Policies* does not make it a better document for agency manager's guidance. In fact, the proposed changes would remove the clear guidance of the 2001 edition, and replace it with muddy, unclear, and too-broad discretion for NPS managers and Administration appointees to judge what is and is not appropriate use of the national parks. A clear service-wide standard for day-to-day management decision-making is proposed to be replaced with a much broader range of choices.

As I have testified before to this subcommittee, there is clearly NO need to amend the NPS Organic Act, or any of the other laws governing how our national parks are intended to be managed. The Organic Act has endured soundly for 90 years, and will probably be good for another 90 years, at least.

Likewise, there is NO need to re-write *Management Policies*. For those narrow subjects that the Administration has asserted were not addressed in the 2001 edition (homeland security, cell towers, succession planning, etc.) the issuance of specific *Director's Orders* is the operative process already in place to take care of them.

What is needed is for the broad constituency of interests that are engaged with the National Park Service—recreation, tourism, gateway communities, conservation, preservation, and regular “good citizens” – to step up their support for their national parks as they are, and as they are intended to be, preserved unimpaired for future generations to enjoy. Special interests must give way to the national interest if the national parks are to flourish in the future.

In 1918, Secretary of Interior Franklin Lane articulated the core management policy for the NPS, which endures today, “*First, that the national parks must be maintained in absolutely unimpaired form for the use of future generations as well as those of our time; second, that they are set apart for the use, observation, health, and pleasure of the people; and third, that the national interest must dictate all decisions affecting public or private enterprise in the parks.*”

Appropriate Recreation

Nearly 300 million people visited the parks last year, and we know from surveys that they “enjoyed” them. NPS concessionaires grossed over \$1 billion in 2004; surrounding gateway communities and businesses grossed over another \$11 billion attributable to national park visitors. Despite this, there are those who suggest that NPS management of the parks is TOO RESTRICTIVE, or that the parks are LOCKED UP, or lack ACCESS. Nothing could be further from the truth.

Nevertheless, some want to engage in thrill-type recreation activities, mostly in various types of motorized vehicles, in the national parks. Some (but far from all) park gateway



communities complain that they could draw in more tourists if the NPS were “less restrictive” of various uses. These types of demands would seek to kill the goose that lays the golden egg, and must be rejected or ignored.

The national parks do not have to sustain all recreation; that is why we have various other federal, state, local, and private recreation providers to share the demand, and to provide for those types of recreation that generally do not belong in the national parks, or that must be carefully limited. The 1916 NPS Organic Act, emphasizing conservation for future generations, is substantially different from the organic laws of the Bureau of Land Management, the US Forest Service, the US Fish and Wildlife Service, the Army Corps of Engineers, or any other federal agency. The NPS mission is also different from that of state park agencies, or of county or city park agencies. Together, these agencies provide for many forms of public recreation – but not all forms of recreation are appropriate in national parks.

Balancing Use with Preservation in Day-to-Day Management of National Parks

Over the 90 years history of the NPS, there has been much debate over whether the NPS is achieving the proper balance between uses of the parks for today, and conserving them unimpaired for future generations. These conflicts usually erupt over day-to-day management of particular parks, and the decisions that the NPS makes as it goes through periodic management planning. It is crucial to this discussion, however, to note *that there is no credible debate over whether parks should be used by the American people, the debate centers on how the use occurs, or sometimes when or where.*

- The snowmobile controversy in Yellowstone would be far less significant if there were no impacts on wintering bison and trumpeter swans;
- The off-road vehicle debate at Cape Hatteras would be moderated if there were no impacts on breeding birds, or if more of the beaches were limited to pedestrian use;
- Shenandoah National Park staff could be less involved with opposition to adjacent power plants if emission controls under the Clean Air Act were being enforced at a higher standard, and if the scenic vistas from the park’s overlooks were as clear as they were 50 years ago;
- NPS staff at Mojave National Preserve, where hunting is allowed by law, oppose the artificial wildlife watering holes, known as guzzlers, not because they oppose hunting, but because these devices dry up the natural springs at higher elevations, and concentrate wildlife unnaturally, exposing them as easier targets to both natural and human hunters;
- Professional NPS staff at Glacier Bay National Park limit the number of cruise ships allowed in the park at a time, both due to impacts on whales and other wildlife, and to maintain the quality of the visitor experience, both for cruise ship passengers and other park boaters;
- The buildings and associated utility lines for the Giant Forest Lodge in Sequoia National Park were killing the big trees, so NPS had them removed, and had its concessions



partner, Delaware North, build a brand new lodge in a better location, still serving the visitors, but without impact to the giant Sequoias.

For the NPS professionals, conserving the parks *unimpaired* for future generations is synonymous with offering park visitors today a high-quality experience. Scenic vistas should be clear, natural sounds should dominate over man-made noises, native wildlife should be abundant and visible for visitors, historic sites such as battlefields should look like they did when the historic events occurred, park visitor facilities should not be located so as to disturb the natural scene or the cultural landscape.

Viable alternatives to expanded use and commercial development in parks should be provided outside the parks, on other public lands, or in gateway communities. Natural and cultural resources of the units of the National Park System must be maintained and in some cases improved. Preservation is the key to continued success of the NPS in fulfilling its statutory mandate, and also to sustaining the core destinations that fuel the tourism industry.

The Administration Has NOT Made a Case for Proposed Revisions to Management Policies

One of the common explanations provided by Park Service leaders for the proposed changes to management policies is that there is a need to update the 2001 policies to reflect substantive legal changes affecting the agency that have passed into law. For instance, Deputy Director Don Murphy recently stated in the New York Times (1/10/2006) that the proposed management policy changes were needed because “laws have changed, regulations have changed, and times have changed. We have greater responsibilities for homeland security.”

We enthusiastically challenge this proposition, which appears to be an argument borne more from a need to justify a flawed process than an argument that has its roots in reality. Since 2001, there have been no amendments to the 1916 Organic Act. And although the Park Service now must fund roughly \$50 million in new homeland security demands it did not have to spend before September 11, 2001, the 277-page proposed revision to the management policies, which makes hundreds of changes, adds a two-sentence section referring to homeland security. Those sentences, which appear in section 8.3.7, are: “The Park Service will work cooperatively with the Department of the Interior, Department of Homeland Security, and other federal, state, and local agencies to prevent and respond to foreign attacks on American soil. The park service will maintain a capacity to rapidly move law enforcement personnel to Icon, critical infrastructure, or other identified areas in the event of a terrorist attack, elevated threat level, or other major emergency incident.” In addition, the document appears only to add two additional references to “Department of Homeland Security” or “homeland security” to other sections of the document. It is difficult to see how the addition of barely 40 words referencing homeland security justifies so many unrelated changes that affect the Park Service’s core mission. Interestingly, the Park Service’s own website makes no reference whatsoever to the 2002 Homeland Security Act on its online list of park-related laws passed by the 107th Congress. The Interior Department can



much more effectively meet the Park Service's homeland security challenges by securing appropriate reimbursement for them in the federal budget process, rather than by adding two lines to an unwarranted, comprehensive rewrite of the Park Service's management policies.

The absence of any new system-wide law impacting the Park Service makes the significant changes proposed for the Chapter 1 Foundation chapter—which deals with the core mission of the agency—all the more questionable. The current version of the policies had 25 numbered paragraphs in chapter one, including the introduction. The 2006 draft changes 12 of those paragraphs in a substantive way and adds 18 new paragraphs. This is a massive change to a chapter that deals with the core mission of the agency. There have been no changes in law or regulation since 2001 relating to the basic mission of the National Park Service. Therefore, those massive changes are not justified. The Foundation Chapter is called the Foundation Chapter for good cause, and we along with countless Americans believe that agency leaders have failed to substantively prove their case that new laws warrant any changes to this key chapter.

Significant Concerns Regarding Proposed Revisions To The National Park Service's Management Policies

Protecting national parks such as Gettysburg, the Grand Canyon, Martin Luther King's birthplace, and Yellowstone for future generations has been the highest priority of the National Park Service since its inception. The 1916 Organic Act, which created the National Park Service, directs that the national parks be preserved "by such means as will leave them unimpaired for the enjoyment of future generations."

The management policies fill in the details not addressed by Congress in the many laws governing national parks. Management policies define what constitutes impairment of park resources and provide guidance on how to manage specific park resources, such as archeological relics, or how to manage certain land designations, such as wilderness. Historically the National Park Services management policies are revised every 10-12 years as laws that affect the parks are enacted or amended. The last policy revision was in 2001. No significant changes in the laws affecting the parks that would merit a change in policy have occurred since then.

According to NPCA's analysis, the National Park Service's long-term conservative stewardship of the nation's heritage will be weakened by the proposed rewrite of the management policies. The rewrite includes numerous damaging proposals, most notably the removal of significant language included in the existing 2001 Management Policies about the importance of conservation above all else in park decisions.



Following are the significant revisions proposed in the rewrite of greatest concern to NPCA:

Section 1.4.3 – The NPS Obligations to Conserve and Provide for Enjoyment of Park Resources and Values

Specific Revisions:

The revisions entirely removes the language referring to the Organic Act as beginning “with a mandate to conserve park resources and values” and that this mandate “is independent of the separate prohibition on impairment, and so applies all the time, with respect to all park resources and values, even when there is no risk that any park resources or values may be impaired.” This section also removes the language describing how “Congress recognizing that the enjoyment by future generations of the national parks can be ensured only if the superb quality of park resources and values is left unimpaired, has provided that when there is a conflict between conserving resources and values and providing for enjoyment of them, conservation is to be predominant.” Finally this section deletes the explanation that the courts “have consistently interpreted the Organic Act, in decisions that variously describe it as making resource protection the primary goal or resource protection the overarching concern, or as establishing a primary mission of resource conservation, a conservation mandate, an overriding preservation mandate, an overarching goal of resource protection, or but a single purpose, namely, conservation.”

Concern:

These revisions reinterpret the NPS Organic Act and reduce the clarity of the NPS mission. The deleted language reflected 80 years of NPS policy that established conservation and resource protection as the NPS primary purpose. The language was replaced with more ambiguous language dispersed throughout the document that, in the aggregate, de-emphasizes the importance of resource protection and might lead some readers to conclude that NPS has a dual purpose, namely protecting resources and providing opportunities for enjoyment, and that the latter is given as much weight as resource protection. If the deleted language were retained, the ambiguity of all the other sections would be removed.

Specific Revisions:

The revision inserts the following guidance, “The Park Service recognizes that activities in which park visitors engage can cause impacts to park resources and values, and the Service **must balance** (emphasis added) the sometimes competing obligations of conservation and enjoyment in managing the parks. The courts have recognized that the Service has broad discretion in determining how best to fulfill the Organic Act’s mandate.”

Concern:

The overarching mandate as set down in the Organic Act is to protect park resources. Nowhere in the statutes governing the parks is the NPS instructed to “balance” resource preservation and visitor use. Furthermore, the park manager does not have “broad discretion” as to how to fulfill the Organic Act mandate as stated in the proposed draft. While federal courts have shown deference to the federal decision-maker in questions about defining impairment, these same



courts have universally upheld the paramount mandate of the Organic Act to conserve park resources and values unimpaired, even to the extent of reducing or eliminating a particular form of use.

Section 1.4.3.1 - Appropriate Use

Specific Revision:

The proposed definition of “Appropriate Use” states that such uses may include uses whose impacts can be successfully mitigated or eliminated through

- visitor education,
- temporal, spatial, or numerical limitations on the use,
- the application of best available technology, or
- the application of adaptive management techniques.

Concern:

Relying upon mitigation to resolve an impact may solve one problem, but frequently creates others. As clever as we humans are, we still are pretty ignorant when it comes to nature. It is far better to avoid the damage than try to clean up afterwards.

Section 1.9: Partnerships

Specific Revision: The proposed amendments insert concepts, such as “cooperation” and “consensus-based management” that could lead to the National Park Service inappropriately sharing its decision-making authority with outside entities to the detriment of park resources. In addition, the policies have incorporated the Secretary of Interior’s “4 Cs mantra” – “Communication, Cooperation and Consultation all in the service of Conservation” without sufficiently addressing the adverse impact this could have on management decision making.

Concern:

The National Park Service already communicates and consults with outside entities, however, “cooperation” is a term that can be interpreted to mean consensus in the law. For example, in 2000 the NPS and the Department of Transportation drafted a rulemaking that stated that, “Cooperation means that the parties involved in carrying out the planning and/or project development processes work together to achieve a common goal or objective.” (USDO/USDOT Part 1610 Transportation Rulemaking) In other words, the NPS would not be able to decide unilaterally its management objectives for its roads, but would have to accommodate the goals of the state DOT and carriers on as well. It is easy to see how a similar definition of cooperation could be drafted for the management policies that could lead to the NPS seeking accommodation with and approval from local entities for many of its decisions.

The addition of “consensus-based” management to this section inappropriately establishes the concept that the National Park Service is not the final arbiter of its own management decisions. The encouragement of “consensus-based” management with public partners could lead the NPS



to cede decision authority it is legally not allowed to relinquish. For example, some superintendents may feel they should seek outright approval for management actions from partners, before taking certain management actions. In fact, in numerous conversations with park personnel around the country, the overall reaction to the insertion of “cooperation” and “consensus-based management” has been that they will now need to seek approval from local stakeholders before moving forward with management actions.

To be sure, it is critically important that national park managers communicate openly and productively with local communities, and that they understand and attempt to learn about how their decisions might impact local communities. The reverse is also true for local communities, themselves, when they take actions that could impact the parks. However, national parks need the continued ability to make their own decisions to protect the resources they are created to protect. In order to ensure that there is no confusion on the part of managers as to where the responsibility for final decisions lies, the references to “cooperation” and to “consensus-based management” should be stricken.

Section 4 - Natural Resource Management – Air

Deleted from the first paragraph:

“Natural resources, process, systems, and values found in the parks include physical resources such as clear skies” and “highly valued associated characteristics such as scenic views.”

Added to the second paragraph:

“The term ‘natural condition’ is used here to describe the condition of resources that would occur in the absence of human dominance over the landscape, but not necessarily the absence of humans.”

Concern:

In combination these changes fundamentally weaken the standard that the National Park Service must apply to managing park air resources. Under the existing policies, pollution-free air (“clear skies”) is an essential part of the parks, equal to soil, water, and other physical resources. The rewrite demotes clear skies to an “associated characteristic.” Although not defined or used elsewhere in the draft, the term “associated characteristic” strongly implies that clear skies would not qualify for the same degree of protection as would other physical resources of the parks. This is reinforced by the draft’s deletion of scenic views as a highly valued natural resource of the parks. In addition, the current policies effectuate the Clean Air Act mandate to remedy all existing impairment of park visibility caused by man-made air pollution, and to prevent future impairment (CAA Sec. 169A). The states are now writing plans to implement this mandate, and as part of that process are defining “natural” visibility conditions for the parks. By redefining the term “natural” to include impacts caused by human activities, the redraft opens the door to some level of existing air pollution being included in the definition of “natural.”



For example, Great Smoky Mountains National Park's natural 100-plus mile views that existed before the proliferation of coal-fired power plants would never be restored if "natural" conditions were redefined to include the presence of man-made activities like power generation.

Section 4.9 - Soundscape Management

Deleted from the first paragraph:

"The National Park Service will preserve, to the greatest extent possible, the natural soundscapes of parks."

Concern:

The purpose for this change is unclear, not specifying where or in what circumstances natural soundscapes should be protected as they are today. By removing this goal from the opening of this section, one could interpret this as a de-emphasis on soundscape preservation. While the new revision still notes that the National Park Service "will restore degraded soundscapes wherever practicable and will protect natural soundscapes from degradation due to unacceptable noise," the force of the word "preservation" with regard to soundscapes is lost. Moreover, by substituting "wherever practicable" for the phrase "wherever possible," this revision may force a "cost-benefit" analysis on future soundscape conservation efforts, which could hamper National Park Service actions to study and preserve soundscapes in a tight budget environment.

Section 6.2.1 - Assessment of Wilderness Suitability or Non-suitability

Deleted:

"All lands administered by the National Park Service, including new units or additions to existing units since 1964, will be evaluated for their suitability for inclusion within the national wilderness preservation system. The assessment must be completed no later than one year after the establishment of the park or the acquisition of new lands."

Concern:

This sharply contrasts with the 2001 Management Policies that explicitly require a wilderness review of all existing park units, lands that are added into the system, and lands deserving re-evaluation due to changed circumstance. In addition, the mandate to conduct these reviews in a timely manner, many of which are decades overdue, is entirely removed. Hundreds of thousands of acres currently under the jurisdiction of the National Park Service and potentially having wilderness character are affected by the proposed revisions and risk not being reviewed and/or protected. Included in this list are Nevada's remote 76,000-acre Great Basin National Park and the spectacular Redwood National Park along California's northern coast.



Section 6.3.1 - Wilderness Resource Stewardship General Policy

Added language:

“Lands that were originally deemed wilderness eligible, but which were not included in the wilderness recommendation sent to Congress, will no longer be managed under the provisions of these chapter 6 policies. They will, however, be managed in accordance with the same high standards to which all other NPS lands are managed, in full accord with all other provisions of these *Management Policies*.”

Concern:

The revision weakens interim protection for lands deemed suitable for wilderness designation by the superintendent, Director, Assistant Secretary and Secretary but not necessarily recommended by the President to Congress. Essentially they “release” lands from interim protection earlier in the multi-step review process. If the past record is any indication, the review process through Presidential recommendation can, unfortunately, stall at various levels within the Administration and take years, and in some cases decades to complete. Therefore ensuring interim protection of these areas in order to preserve congressional discretion is essential. To do otherwise, usurps congressional prerogative.

Section 8.1 - Use of the Parks - General

Specific Revision:

The revision deletes “the Service will not knowingly authorize a park use that would cause negative or adverse impacts unless it has been fully evaluated, appropriate public involvement has been obtained, and a compelling management need is present. In those situations, the Service will ensure that any negative or adverse impacts are the minimum necessary, unavoidable, cannot be further mitigated, and do not constitute impairment of park resources and values.” It is replaced by a phrase in Section 8.1.2 that says: “When a use is causing or would cause unacceptable impacts, the Service will seek first to manage the use in a way that will eliminate unacceptable impacts and, when necessary, restrict or disallow the activity.”

Concern:

This completely changes the approach to considering a use. The deleted language only allows the uses after it’s been evaluated and deemed to be necessary, and after impacts are minimized and determined to be unavoidable. The new language requires the superintendent to affirmatively look for ways to make the use less damaging so it can be allowed. And while the manager can still prohibit the use, unlike the existing policies, the mandate to help the “use” comply with the law makes it difficult to stop an offending use that would be easily prohibited under the existed rules.



Section 8.2 - Visitor Use

Specific Revision:

“The Service will not allow visitors to conduct activities that unreasonably interfere with the atmosphere of peace and tranquility, or the natural soundscape maintained in wilderness and natural, historic, or commemorative locations within the park.” This is replaced by “an unacceptable impact is an impact that would unreasonably interfere with the park’s desired conditions, as identified through the park’s planning process.”

Concern:

A loud, offending motorized vehicle, if not covered by the Directors Order, could not be prohibited unless the park had a soundscape management plan or remembered to include natural quiet as a goal in its planning documents. This removes a useful tool for managers. The combined effect of this and the deletion in section 4.9, is a clear retreat from an emphasis within the national parks on protecting visitor enjoyment of natural sounds and natural quiet.

Section 8.2.2 – Recreational Activities

Specific Revision:

The revision replaces the provision that a new form of recreational activity will not be allowed within a park “until after an environmental analysis has determined that it will not result in unacceptable impacts” with “if a park manager determines that it will result in unacceptable impacts.”

Concern:

Reverses the burden of proof on unacceptable impacts. Currently, a new form of recreation will not be allowed until after an environmental analysis has been determined. The language in this section proposes that the activity will not be allowed “if” a park manager determines it will cause unacceptable impacts. Not restricting a new activity until after an environmental analysis has been completed could lead to additional difficult recreation management situations; such there are with snowmobiles and PWCs. Frequently impacts to resources are not something that is readily obvious. Once a use has becomes established, however, it is difficult to ban.

Section 8.2.3 - Use of Motorized Equipment

Deleted:

“Where such use is necessary and appropriate, the least impacting equipment, vehicles, and transportation systems should be used.”

Concern:

The snowmobile controversy in Yellowstone is a good example. The National Park Service and the Environmental Protection Agency have independently concluded in three major studies since 2000 that allowing snowmobile use to continue in Yellowstone—even with limits on the number



and type of snowmobiles—results in significantly more noise, exhaust, wildlife disturbance, and human health risks than the environmentally-preferred alternative of replacing snowmobiles with snowcoaches. The new draft policies remove specific direction to the National Park Service to heed such scientific conclusions and use only the least impacting equipment and vehicles. This opens the door to more snowmobiling and associated noise and air pollution, and wildlife disturbance, not only in Yellowstone but also in other national parks.

8.2.3.1 – Off-road Vehicle Use

Deleted:

”Off- road motor vehicle use in national park units is governed by Executive Order 11644 (as amended by Executive Order 11989).”

“Routes and areas may be designated only in locations in which there will be no adverse impacts on the area’s natural, cultural, scenic and esthetic values, and in consideration of other visitor uses.”

“Consistent with the executive orders and the Organic Act, park managers must immediately close a designated off- road vehicle route whenever the use is causing, or will cause, unacceptable adverse effects on the soil, vegetation, wildlife, wildlife habitat, or cultural or historic resources.”

Concern:

These combined changes reduce clarity for park managers regarding adverse and unacceptable impacts, and therefore overall management, of off-road vehicles. First, they remove reference to the specific executive order numbers that provide the basis for managing off-road vehicles (and that provide more explicit language on types of unacceptable impacts). In addition to not providing guidance on which executive orders to refer to, the new policies also remove specific reference to the types of off-road vehicle impacts, including soil, vegetation, wildlife, cultural and visitor impacts, that are unacceptable. How will a park manager use these new policies to determine when and where to actually close routes with no reference to the types of impacts that might justify such closures? If those impacts have been codified anywhere, the new regulations provide no guidance as to where that information can be found. This leaves off-road vehicle impact problems largely up to the discretion of individual park managers.

Section 8.2.3.3 – Personal Watercraft

Specific Revisions:

The language stating that motorized personal watercraft are banned unless identified as “appropriate” has been changed to state that motorized personal watercraft may be permitted if found appropriate.



Concern:

The revisions to the language in this section soften the widely held contention that personal watercraft are inappropriate in most national parks, thus encouraging pwc enthusiasts to pursue access opportunities.

Section 8.4.8 – Airports and Landing Sites

Added language:

Fully functional, efficient, and safe operation of airports is important to providing visitors opportunities to use and enjoy their parks. To help achieve this, and in recognition of the needs of adjacent local communities, the Service will work cooperatively with the Federal Aviation Administration and other entities having jurisdiction over landing sites and airports adjacent to parks.

Concern:

Ensuring the functionality of a local airport should not be a concern of a local park manager other than its impact upon park resources and park visitors. This section does not serve to clarify NPS standards, but to confuse park managers as to where their priorities should lie. For example, how does this section help the park manager faced with an airport expansion that will have impacts upon park resources and experiences, but that will provide more efficient and convenient air access?

Section 8.6.8.1 - Domestic and Feral Livestock

Deleted:

“No livestock use or activity, regardless of how authorized, will be allowed that would cause unacceptable impacts to a park’s resources, values, or purposes. In particular, livestock use that depletes or degrades non-renewable resources, or whose effects cannot be satisfactorily mitigated, will not be allowed.”

Concern:

By removing this language in the “umbrella criteria” section that sets forth the general standards for livestock use in National Park Service units, there is a general shift away from existing a policy that places highest priority on protection of park resources, to a policy that allows or continues permitted grazing with park protection taking a back seat. Again, it is not clear what problem the Department of Interior is trying to solve with this proposed change.

Thank you for the opportunity to testify here today, and I would be happy to answer any questions.

