

February 17, 2006



American Recreation Coalition

*Dedicated to the protection and enhancement of everyone's right
to health and happiness through recreation.*

The Honorable Fran Mainella, Director
National Park Service
1849 C Street, NW
Washington, DC 20240

Dear Director Mainella:

The American Recreation Coalition (ARC) is pleased to submit comments on the proposed revisions to the National Park Service Management Policies. In addition to addressing specific content of the proposal in an attachment to this letter, we wish to offer some general comments on the value of the policy review and the overall philosophy that we believe should guide the agency in its stewardship of a treasured public legacy – the national park system.

ARC commends the agency for seeking to address long-range and strategic goals during a period when many important and immediate issues could easily overwhelm the agency leadership. **ARC supports periodic review of and revisions to the agency's management policies** and feels that undertaking such a review now is both necessary and appropriate. We believe that **the review can and should be a consensus-building effort**, with full and open discussion emphasizing ideas and vision. While understanding that our parks prompt great passion, we urge the agency to commit to a process that encourages and rewards constructive dialogue.

To help keep the policy dialogue constructive, we think that it is important to emphasize two key points, which have been included in the proposed policies and in testimony before the House of Representatives Committee on Resources: **first, that the laws, regulations and executive orders now in place prevail over policies; and, second, that the proposed revisions will not dramatically alter current park operations and conditions.**

We support the current review as especially significant because the 2001 version of NPS management policies was developed under Interior leadership that repeatedly expressed concerns about visitors "loving the parks to death" and suggested the likelihood of continued large increases in park visitation. This philosophy pervaded departmental and agency thinking, even to the point that Take Pride in America – a proven vehicle for building appreciation for public lands and volunteerism

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on those lands – was mothballed by departmental beliefs that the program unwisely encouraged visits to public lands and that volunteerism was an ineffective tool for park protection and operation.

We believe that philosophy was based on a false premise. In fact, recent data suggest that **visitation to the national park system is not increasing**. Visitation in 2005 was down 2.1% for the year and visitation to the small portion of the 388-unit system comprised of national parks has been stable or trending downward for several years. We have a real **fear that the mental, physical and spiritual benefits of visits to our national park system will be realized by a declining portion of the public** – and that the system will have little meaning for some of the U.S. population cohorts experiencing the fastest growth – ethnic minorities, urban residents, and young people. We are not alone in our concern. There are signs of increasing public sensitivity to this prospect, as evidenced in such literature as Richard Louv's book ***Last Child in the Woods: Saving Our Children From Nature Deficit Disorder*** and news accounts such as the ***Los Angeles Times'*** February 13, 2006 story "Fishing's Lure Lost on Young."

We are pleased that **the proposed policies adopt a much more balanced approach toward the mission of visitor management in parks**. We believe it is a far more accurate reflection of the progressive philosophy that guided the creation and early management of the national park system. This early ethic was actively pro-people and prompted actions to encourage and assist visitors – through the construction of roads, lodges and a variety of additional infrastructure. That ethic also reflects a philosophy that we embrace: that park visitors are great friends of the national park system; that the most important threats to the parks often arise from activities and uses proximate but external to the parks; and that the best means to address those challenges is agency communication with other entities, including state and local governments. The **proposed revisions provide a stronger framework for engagement with external entities**, as well as a proven philosophy for these efforts: cooperative conservation.

We believe that **the 2001 policies erred in responding favorably to an understandable desire among some park managers and park advocates for a simplistic, single-focused mission**. As an example, the 2001 policies stated:

NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on park resources and values.

This statement does not reflect the direction of the Organic Act and ignores the management precedents of the agency's most respected early leaders. **The vision of those leaders resulted in design and construction of infrastructure that has long enhanced visitation to the parks while providing protection for park features and qualities**: roads that host 90% and more of all visits; lodging, including world-class

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accommodations; visitor centers, and more. **A more recent example of this same philosophy is the construction of elevated walkways through alpine meadows in Glacier National Park at Logan Pass** – an action that greatly mitigated visitor impacts on vegetation and permitted tens of thousands, including those who are mobility impaired, to enjoy the astonishingly beautiful meadows. The 2001 policies document failed to embrace such pro-visitor, pro-protection actions. We strongly support actions of the National Park Service that yield both resource protection and increased opportunities for public use and enjoyment.

Early leaders of the National Park Service also revised operations to accommodate changes in travel modes and activity preferences. In some instances, actions proved inappropriate – like the firefall at Yosemite – and have been either ended or mitigated. We have learned that many visitor-related impacts can be addressed and subsequently eliminated – with damage to resources proven temporary and reversible.

We recognize the challenges faced by the agency in adopting a management philosophy that stresses both protection and enhancement of visitor experiences. However, we submit that **virtually all organizations face multiple goals**. Transportation agencies seek to provide safe and rapid movement of goods and people; motor vehicle manufacturers must juggle safety, efficiency, performance, cost and other consumer and government expectations.

While we do find many of the changes in the draft appropriate and supportable, **we are very disappointed to find no reflection of the charge provided under Executive Order 13266**, which directs the National Park Service and other federal land managing agencies to assist in a national goal of increasing healthy physical activity by the public as a means to promote improved physical and mental health. A copy of the Executive Order is appended. The EO states, in part:

The Secretaries of Agriculture, Education, Health and Human Services (HHS), Housing and Urban Development, Interior, Labor, Transportation, and Veterans Affairs, and the Director of the Office of National Drug Policy shall review and evaluate the policies, programs, and regulations of their respective departments and offices that in any way relate to the personal fitness of the general public. Based on that review, the Secretaries and the Director shall determine whether existing policies, programs, and regulations of their respective departments and offices should be modified or whether new policies or programs could be implemented. These new policies and programs shall be consistent with otherwise available authority and appropriated funds, and shall improve the Federal Government's assistance of individuals, private organizations, and State and local governments to

- (i) increase physical activity;

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Although there is no reference to the Executive Order in the proposed management policies, the National Park Service has taken important actions to implement this directive through the National Park Service Advisory Board. We believe reference to this activity, and guidance to the field to support implementation of the Board's recommendations, should be incorporated into the proposed policies.

We also **find the proposed document to be inadequate in providing park managers and allies with guidance for responding to a new fiscal reality – that the mission of the agency cannot be effectively implemented through appropriations alone**, but that alternatives are available that can make park system management successful. Director's Order 21 is referenced, but it is just a portion of the needed direction. We feel increased attention can and should be placed upon using fees to increase agency resources, as well as upon tapping funding available through other federal, state and local government programs in the transportation, health, education, criminal justice and other arenas. ARC has worked with the agency on this topic, producing a compilation of revenue sources known as the ***Toolbox for the Great Outdoors*** in 2003. A subsequent and significantly expanded ***Toolbox*** is now in development. We believe it, or at minimum a reference to its philosophy, must be incorporated into the final policies.

The proposed policies support improved use of science to aid both decision-making and management. This strengthened direction is appropriate and is an important means to avoid and reverse decisions and actions based instead upon individual manager's values and attitudes. We have witnessed incidents where such values have inhibited adoption of strategies that will make park visits relevant to and valued by diverse visitors – without significant environmental or social consequences. For example, geo-caching, mountain biking and over-snow transportation can each enhance and encourage park visits and, yet, in many cases, have been resisted reflexively by managers. Protection of intrinsic values of park units cannot become an excuse for opposing changes that are appropriate. We urge agency leadership to review the attached article from the February 2006 issue of ***Backpacker***, "Buzzing Still." This article provides proof of the power of using good science and technology to achieve the full agency mission of resource protection and quality experiences for park visitors.

We firmly believe that **increased use of technology to educate, interpret for and manage visitors – often through partnerships – is a preferred course for the National Park Service.** However, we have seen little enthusiasm for this course – and a general aversion to high tech as compatible with resource protection. We reject that premise and suggest it is the product of values and attitudes triumphing over science and good management. The multi-lingual Pocket Ranger initiative at Santa Monica Mountains NRA is especially praiseworthy as proof of compatibility of technology and park mission and partnerships.

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Finally, we are **concerned by the failure of the proposed revisions to acknowledge and celebrate the extraordinary diversity of the national park system.** This diversity must be reflected in the operations of these units. Man-altered environments like Lake Mead, much of Golden Gate NRA and the National Mall, for example, must be managed far differently than park units with extensive Wilderness and backcountry zones. And we are especially passionate about the value of these altered areas. These are the units that many Americans will first encounter when they visit the national park system, and play a special role in creating an understanding of the value of the priceless outdoor legacy we enjoy today. Past leaders of the National Park Service have striven to be relevant to the public. The agency's 21st century leaders must continue to do so and will find these efforts to be invaluable help in building public interest and backing during an era of competition for leisure time and for institutional support.

In addition to these comments, ARC submits the attached document, which details our views on specific portions of the proposed NPS Management Policies.

Sincerely,
Derrick A. Crandall
Derrick A. Crandall
President

Attachments:

EO 13266

Los Angeles Times: February 13, 2006, "Fishing's Lure Lost on Young"

Backpacker: February 2006, "Buzzing Still"

