



## American Recreation Coalition

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

July 14, 2006

Mr. Steve Martin, Deputy Director  
National Park Service  
1849 C Street, NW  
Washington, DC 20240

Dear Steve:

We thank you for your time in recent weeks to ensure good communications regarding the National Park Service Management Policies. The discussions have been helpful.

ARC and its members are committed to a process which delivers a valuable and useful NPS Management Policies document to the men and women charged with day-to-day oversight of the 390 units of the national park system – and to the many individuals and organizations that have a genuine interest in assisting in the protection of this wonderful national legacy.

We want to share concerns and suggestions regarding the “final draft” of the document released on June 19, 2006, and we want to commit to working with the agency and all other interests to find common ground and consensus.

One of our observations would be that the ten principles used by the agency deserve comment because they are likely to play a crucial role in the implementation of the final document. Most efforts are shaped by the precepts used to launch and guide an initiative. Were we to craft such a list of principles for the Management Policies anew, we would have begun with a commitment to conserve the natural and cultural resources of the areas managed by the agency, followed immediately by a commitment to provide full opportunities for the American public to visit and enjoy units of the national park system. These two principles would address the two elements of the mission outlined in the 1916 Organic Act. Our third principle would be closely related to the principle which received major media attention: a commitment to protect the natural and cultural resources if visitor enjoyment was causing, or threatened to, cause an impairment of park resources – with one addition: that protective efforts would rely on management and limitations on use rather than on outright bans wherever possible.

Regarding the actual content of the Management Policies, we offer the following comments:

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1) Reference is made to the 1916 Organic Act repeatedly – and inconsistently. We firmly ascribe to the interpretation that the National Park Service was assigned a single mission that includes both conservation of the natural and cultural resources of the system units and efforts to ensure that these same resources provide quality experiences for current and future generations of Americans. This is appropriately represented in portions of Section 1 but then altered without explanation or justification in other portions of the document. We urge that the document be revised to put “enjoyment” – park visitor experiences – in a positive context and as a primary objective, giving development of visitor services and facilities equal standing to conservation. An example of needed revision is Section 1.5, which should be re-written to emphasize the diversity of appropriate means to enjoy park units when managed well – including fine dining at in-park hotels, concerts and other cultural events and appropriate organized events such as Race for the Cure on parklands in the National Capital Region.

Similarly, a revision is needed at Page 48, which states: “As explained in chapter 1 of these Management Policies, *preserving park resources and values unimpaired is the core, or primary, responsibility of NPS managers.*” (Emphasis added) This is not an accurate representation of the Organic Act mission. Another example of this inappropriate change is found at P. 15, line 31-32: “and to support its primary concern of protecting park resources and values.” Still another misrepresentation is found at P. 148: *Use of the Parks*. The language in Section 8.1 misreports Congressional direction: “the 1916 Organic Act ... directs the Service to conserve park resources ‘unimpaired’ for the enjoyment of future generations.” The entire section is written in a pejorative tone regarding use by today’s Americans. The Organic Act provides for enjoyment by *current* Americans, as well as future generations. There are additional, similar references in other sections of the draft document that should also be revised.

2) The draft Management Policies provide direction to managers not contained in law and clearly not consistent with the mission to provide opportunities for Americans to enjoy the parks. For example, P. 49 states: “Biological or physical processes altered in the past by human activities may need to be actively managed to restore them to a natural condition ...” Such guidance is absolutely incongruous with the current use of dozens of NPS sites – from Lake Mead NRA to C&O Canal to Going to the Sun Highway, or with the clear expectation that the agency will manage historic battlefield sites to provide visitors with an understanding of the human-altered landscapes on which those battles were fought. This section needs to be altered to refer to appropriate additions of infrastructure and policies which facilitate enjoyment of NPS units where natural biological and physical processes have been altered.

3) The draft Management Policies approach to avoiding resource impairment unnecessarily limits effective management options. Page 13 states: “When an NPS decision maker becomes aware that an on-going activity might have led or might be leading to an impairment of park resources and

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values, he or she must investigate and determine if there is, or will be, an impairment.” While seemingly a good direction to encourage pro-active management, this mandated action could lead to needless repression of enjoyment of park units “to be safe.” We suggest inclusion of additional language that directs the decision maker to respond to actual or likely impairment with management, mitigation and, only if these steps fail, cessation of the activity.

4) We are troubled by the principle encouraging “consistency across the system – one National Park System.” There is value to consistency, but there are 390 NPS units, many of which are assigned specific uses and management direction by statute and which vary greatly from Yosemite to Wolf Trap and Anacostia Park in the greater Washington area. The NPS needs to engage in a review of current statutory and regulatory direction to promote coherency of the system without creating roadblocks to maximizing public benefits from units which feature largely non-natural resource attributes.

5) We certainly support control of noise which has adverse consequences for visitor enjoyment and park natural resources. Yet we find the section entitled “Natural Soundscapes” to be troubling. Section 4.9 states: “The Service will restore to the natural condition wherever possible those park soundscapes that have been degraded by unnatural sounds (noise), and will protect natural soundscapes from unacceptable impacts.” This direction seems to preclude music in the skating pavilion at Anacostia Park, or cheering at softball games on the National Mall, and is a direct threat to recreational activities such as camping and boating. Soundscape-management direction must be re-examined and should be applied where impairment is occurring or will occur, and must not needlessly limit visitor use and enjoyment.

6) We believe that the section entitled “Process for Determining New and Appropriate Uses” (P. 149) should be revised. The section places the burden of evaluating new uses on individual Superintendents, who may or may not be able to evaluate such uses adequately and develop mechanisms and “best available technology” provisions alone. Rather, we suggest that the Director convene a regular meeting of Superintendents to discuss emerging uses and coordinate investigations and pilot management efforts associated with uses. In many cases, such discussions should include state and other agencies which may have complementary regulatory roles. Consultations with manufacturers and sellers of recreation equipment, and with organizations representing those engaged in an activity should be encouraged. Such an approach would also help the NPS manage emerging uses in a coherent, “consistent” fashion. The section also fails to highlight the reality that new uses may assist NPS efforts by providing new means to provide interpretation and education, or by overcoming limitations on those who are physically challenged. The Director should solicit and evaluate proposals for new uses in park units which will aid the mission of the agency.

7) We applaud the new emphasis on Cooperative Conservation, but are concerned by some of the language in “Cooperative Conservation Beyond Park Boundaries”

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(Section 1.6). Page 16 states: “When participating in a park network, the Service will not relinquish any of its authority to manage areas under its jurisdiction, nor will it expect other partners to relinquish theirs.” This language significantly erodes the potential good of Cooperative Conservation, suggesting that agreements are to be proclaimed without engaging in full partnerships. For management of rivers, trails, lakes and other portions of NPS units, it may be vital to relinquish day-to-day authorities to achieve consistent and successful management systems.

8) We believe that the Management Policies in current form do not adequately address the ability of the national park system to serve important needs of the nation. The current focus of the Management Policies is preservation of natural and cultural assets and largely ignores important roles of the agency in health, crime deterrence, education, local and regional economies. NPS has appropriately acted to implement EO 13266, facilitating additional physical activity on public lands to improve the health of Americans. The Management Policies provide no generic, positive direction to decision makers that initiatives of this type – providing benefits to the American public – are important and appropriate.

We urge the Management Policies to apply the principles behind Cooperative Conservation to education, public health, worker training, and other important initiatives. Just as the agency has a role in working with others outside its boundaries on conservation issues, it should establish and work with those in the education, public health, youth skills training (including conservation corps) and other fields to seek ways to gain greater public benefits through cooperation.

9) Overall, it appears to us that the Management Policies do not encourage NPS managers to find innovative ways to improve visitor enjoyment during park visits. One striking example of this failure is found in Section 6.3.10.4, “Signs in Wilderness.” Signs do detract from the wilderness character of an area and make the imprint of man and management more noticeable. Only those signs necessary for visitor safety or to protect wilderness resources, such as those identifying routes and distances, should be permitted. However, this is only half of what NPS policy should be. Managers should be encouraged to enhance visitor enjoyment and benefits by developing and implementing non-intrusive new technologies to provide information which would enhance visitor experiences – downloadable information for MP3 players and iPods, even cellular phones. And this recommendation applies not only in Wilderness and Wilderness Study areas but throughout the system.

10) We recommended in our February comments and reiterate that recommendation now that the agency establish a regular cycle and process for review of the NPS Management Policies. The level of concern regarding any changes – and the allegations of hidden agendas – by those in and out of your agency suggest a fundamental misunderstanding of the Management Policies. Changes in laws, regulations and knowledge will occur and must be considered by the agency as impetus for modified Management Policies. What should be done in the future, though, is adoption of a transparent and consensus-striving process – one that promotes dialogue

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and understanding among NPS officials and all those interested in the national park system.

In closing, we reiterate our interest in engaging in a constructive dialogue with NPS and other park interests to conserve and protect an outstanding shared legacy – and to facilitate the enjoyment of that legacy by Americans of all ages, ethnic backgrounds and socio-economic status today and long into the future.

Sincerely,

Derrick A. Crandall  
President

cc: The Honorable Dirk Kempthorne  
The Honorable Fran Mainella  
The Honorable Steve Pearce