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### External Development: Turning Problems into Opportunities

T. Destry Jarvis

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EXTERNAL DEVELOPMENT: TURNING PROBLEMS  
INTO OPPORTUNITIES

T. Destry Jarvis  
Vice President for Conservation Policy  
National Parks and Conservation Association  
Washington, DC

External Development Affecting the National Parks:  
Preserving "The Best Idea We Ever Had"  
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EXTERNAL DEVELOPMENT: TURNING PROBLEMS  
INTO OPPORTUNITIES

T. DESTRY JARVIS  
VICE PRESIDENT FOR CONSERVATION POLICY  
NATIONAL PARKS AND CONSERVATION ASSOCIATION

August 25, 1986

By careful design, uncommon good luck, hard work, or historical accident, the national park system has evolved over the past 114 years to become the finest such array of natural, cultural, and recreational resources in the world. We in 1986, are the fortunate beneficiaries of the good work of the conservation leaders, in and out of government, who worked to establish these areas, and this fact makes all the more important the responsibility which we all share to pass along the national park system's resources intact to future generations.

The American public understands that there is a serious problem facing the national park system. There is a popular myth, however, even among generally well-informed conservationists that national parks once designated are preserved and protected for all time, and thus we can turn our attention to other lands and environmental problems of concern. Unfortunately, this popular belief is far from true. The National Parks are seriously threatened all across the nation. The problems facing the system have arisen, cumulatively, quietly in some cases, and insidiously, "whittling away" as one Park Service director said, at the integrity of the parks' resources.

In our view, these problems and opportunities are roughly divisible into five categories.

First, the integrity of park ecosystems and historic landscapes has been seriously jeopardized by the encroachment of society in all its forms around park boundaries in a manner totally beyond the control and often beyond the comprehension of either the Service or those engaged in the encroachment.

Second, the system has grown in size and responsibility without a concomitant growth in the size of the Service which cares for it.

Third, the Service to date has not adequately responded to the cumulative impact of many threats by either bringing into the Service or selecting from within, a large number of resource management specialists and resource scientists who can give the Service the skills and the data it needs to make informed decisions and defend them.

Fourth, the phenomenal popularity of the parks has been reflected in the astounding growth in visitation and the tremendous diversification in the types of use which the parks must absorb. (Unfortunately, the Service has been altogether too timid in acknowledging and responding to the need for visitor impact management as required by law.)

Fifth, and some would say, most importantly, the Service and the system have faced the most sudden and often conflicting pressure of politicization of any agency at any level of government.

NPCA, working together with the professionals of the Service and the millions of citizens throughout the country whose love of and support for the national parks has never wavered, are seeking to restore the resources of the parks which have been damaged, protect those which are threatened, and maintain that which is intact.

### Resource Management and Protection

In the late 1970s NPCA became increasingly aware that the natural and cultural resources of the national parks, and therefore the very essence of the parks' purposes, were coming under increasing pressure from incompatible activities. As we looked at the kind of issues and conflicts in which NPCA was involved we realized that these conflicts were not isolated incidents but rather a systemwide and pervasive challenge to the health of the national park system as it was envisioned by its original creators. This led in 1979 to an NPCA survey of adjacent land impacts on parks. The findings were shocking. NPCA's survey led to the more comprehensive 1980 NPS State of the Parks Report and the alarming conclusions now familiar to many of us. Virtually every unit of the national park system was found to be facing serious threats to the integrity of its resources. What was particularly disturbing was that nearly 50 percent of the problems confronting the parks were due to activities outside parks, particularly on other federal lands.

Since 1980 the Service has floundered in trying to cope with this challenge. The Administration's response was to invest virtually all the new monies available to the NPS into infrastructure repairs through the Park Restoration and Improvement Program (PRIP). After Congress added \$10 million in Fiscal Year 1983, PRIP began to focus somewhat on pressing resource problems, however these funds enabled the Service to address only a small fraction of the internal threats and largely ignored the external ones. The important point is that the 1980 State of the Parks Report failed to illicit from the NPS or the Department of the Interior a comprehensive servicewide commitment to alleviating or eliminating these devastating challenges.

These are not simple problems nor will needed monies alone be the sole solution to improving the status of our parks. A myriad of projects such as oil and gas development on lands adjacent and within park units, tar sand development adjacent to and within park units, the proposal for a high level nuclear waste dump immediately adjacent to Canyonlands

National Park, geothermal development threatening to disrupt the delicate thermal features, of which Old Faithful in Yellowstone National Park is a part, as well as posing a threat to other units, coal mining and possible power plant construction directly adjacent to units of the system are all activities which threaten the ability of the National Park Service to maintain the parks "unimpaired for future generations." Each of these projects poses threats to air quality, water quality, water quantity, to the solitude one seeks in visiting these preserves, or to preserving the natural habitat needed for the survival of wild and free roaming animals.

Since 1980 we have seen great improvement in the understanding of where and, to some extent, how our parks are under siege. A comprehensive solution has, however, proven to be a far more difficult task for the NPS to craft.

NPCA is greatly encouraged that Director Mott has embraced resources protection as one of the primary objectives of his 12 point plan. There are many dedicated individuals within the Park Service who have tried to devise solutions to the threats posed by development but without a servicewide comprehensive response the solution will evade us all.

Of primary importance must be a Departmental "re-recognition" that the mission of the National Park Service is to preserve distinctive natural resources, significant cultural sites, and outstanding recreational resources for the enjoyment, appreciation, and education of present and future generations, as well as a recognition that the goals of this mission are inviolate and can not be by a cost/benefit analysis..

Despite the now widespread recognition that the parks face a plethora of threats from external sources, to date the Administration has failed to develop a comprehensive response to the problem. For five years, the Administration has opposed any and all efforts to achieve a comprehensive legislative solution to the problem of external threats, and has not developed any solution administratively, utilizing authorities already available.

NPCA has maintained throughout the legislative debate on the park protection bills that most if not all of the "authorities" contained in these bills were already available to the Secretary and/or President, but that in the absence of any willingness on their part to utilize these authorities, Congress should direct them to do so by enacting legislation.

There are those in both the Administration and the Congress who continue to believe that there is no real external threat problem facing the parks. This was, in fact, precisely the view taken by the BLM during meetings in recent months within the Department on resolving conflicts among Interior agencies. Although these meetings began as a forum for discussing park protection, the conclusions to date indicate that the only goal sought it to avoid or resolve conflicts between agencies.

This inadequate response of the Administration to a serious condition facing the parks is not acceptable. The Administration has failed to give the needed directive to the Department as a whole that they have an affirmative responsibility to protect the parks.

Rather they must acknowledge that actions on federal lands around national parks are causing problems for park resources, and must develop a policy that recognizes the responsibility of all Interior agencies, and others, to assure that their actions do not damage park resources. In our view, assuring that national parks system resources are fully protected should be an affirmative objective for all levels of the federal government, taking priority, if necessary, over other aspects of an agency's mission.

This Departmental commitment would then serve as the measure against which to frame conflict resolution, within which to shape visitor use patterns, and by which the addition of new areas can be judged. This may sound like a simple need but it truly reflects how seriously the Department has strayed from its original obligations to the parks.

We have heard similar sounding commitments in the past. Examine for a moment the actions of the Department of the Interior. In the last three budget years resources management has not received the level of support nor has it been given the increased priority that the Department had led us to believe that it would. In fact resources funding has been the lowest among eight listed priorities.

If the Department would establish a common purpose of park protection then the development of a comprehensive long range plan, as Director Mott has requested, becomes a matter of process. NPCA believes that there are critical elements to a comprehensive plan which include:

1. The development of baseline resource inventories of park resources and their status (i.e. threatened, declining, increasing) and monitoring systems to continue to be able to actively assess critical situations.
2. The need exists for a prioritization of resource improvement projects based on severity of threats but not one in which choices of relative resource importance must be made. The Resource Management Plans were an attempt - a beginning to establish these priorities. The existing plans were developed without the necessary emphasis on external threats and without any centralized oversight. The existing plans are not available for every unit of the system nor is there any uniform level of quality. For some areas the plans were developed to better compete for scarce resource dollars. For other areas the plans do represent long range funding and planning documents. We fully support a park level approach to establishing resource mitigation and preservation priorities. From these plans can come region-wide efforts or systemwide projects. Until this plans are improved or amended the firm basis upon which to build will not exist.

3. Each large unit of the system must have at least one professional Resource Management Specialist on a full time, or for the smaller units, a part time basis at a level within the park management structure high enough to provide the necessary emphasis on resource preservation and maintenance. Current training and career opportunities do not provide the impetus to either assure that qualified assistance is available or will be available in the future.

4. NPS must develop a comprehensive automated resource information system. This will assist the Resource Management Specialist in preparing long range funding priorities, will help the dissemination of information on innovative approaches to resource protection and will assist in defining ways to better use scarce dollars on a region or systemwide problem.

5. Coupled with the increased understanding of resource threats must be an improved science program through which to insure well founded solutions to resource problems.

The present National Park Service science research program was established by administrative order some 50 years ago, and has evolved in a piecemeal fashion, resulting in information gaps and a lack of continuity, coordination, depth, and long term vision. In their 1963 report on this matter, the National Academy of Sciences stated that "...An examination of natural history research in the National Park Service shows that it has been only incipient, consisting of many reports, numerous recommendations, vacillations in policy, and little action."

These aspects of the Park Service's science program which were criticized by the National Academy in 1963 are still a concern today. These deficiencies reflect the need for broadening the scope of NPS research to include not only issue-specific research for isolated crises in individual parks, but also to include the development of long-term, comprehensive research plans for each park and the incorporation of these plans into an overall plan for the entire NPS research program.

The absence of comprehensive planning for research is an obstacle to obtaining funding, sustaining the science program, establishing a commitment to science among decision-makers, conducting long-term research - particularly baseline studies and monitoring, predicting information needs, and setting research priorities. The key word here is commitment. The Park Service should be committed to conducting the quality and level of research needed to guide natural resources management decisionmaking over the long term and the Congress should encourage such a commitment.

One method of encouraging this commitment would be to establish a statutory mandate for a National Park Service science program. Unlike the Forest Service and the Fish and Wildlife Service, the Congress has never established statutorially that the Park Service should conduct research to provide information for management decision-making and to monitor the long-term implications of management decisions on park resources.

Congressional action in this area would contribute substantially to ensuring the long-term ecological health and integrity of our National Park System, particularly if legislative language specifically, 1) encourages the strengthening of the linkage between Park Service science and resource management planning and decisionmaking, 2) requires the Park Service to establish communication channels to ensure the availability of existing scientific information to resource managers systemwide, 3) encourages ecosystem level studies which recognize the importance of our parks as vignettes of relatively undisturbed natural systems in a nation of utilized landscapes, and 4) acknowledges the vulnerability of these natural systems to degradation from sources external to the park unit but internal to the ecosystem and encourages appropriate research to document the extent and significance of these threats.

6. The NPS Interpretive Program must be made an integral part of the renewed NPS commitment to resources protection. Through these educational efforts the public can better understand and enhance the servicewide efforts. Not every unit can serve every need. This reality must be reflected in the NPS educational efforts in order for individuals to better understand their proper role in the area they may wish to visit and how they must conduct themselves during their visit. This educational effort can serve to create supporters of this approach to park management and can certainly increase the understanding of threatened resources.

In taking an inward look at park resource enhancement we address only one part of the solution. As I have pointed out earlier, many threats to the parks exist from activities which occur outside the area. Better baseline information and an improved science program will assist the Service in identifying the real source of the problem and in documenting the damage but will not provide the solution.

NPCA does not believe that the external threats problem will be resolved by the Department using its existing legislative authorities. The need for comprehensive legislation cannot be overstated. / The key element lacking at present is the clear mandate for federal consistency in protecting park resources. / The concept is simple, since Congress has mandated that parks be preserved for future generations unimpaired, it seems only logical that such mandate apply to all other federal agencies regardless of their other mission. Examples of statutorially imposed federal consistency are found in a number of other laws already on the books including The Historic Preservation Act, the Coastal Zone Management Act, and the Endangered Species Act. If federal actions are required to be consistent with historic resources of state and local significance on the National Register, as is required by the Historic Preservation Act; if federal agency actions are required to be consistent with state coastal zone management plans, as is required by the Coastal Zone Management Act; and if other federal agency actions must be consistent with preserving the habitat of a single endangered species as is required by the Endangered Species Act; then clearly federal

consistency is not only desirable but essential if we are to preserve the nationally significant treasures carefully selected and set aside in the National Park System. To oppose federal consistency for the national parks, is to oppose the preservation of these unique resources for future generations.

### Conclusion

Clearly, the 337 units of the National Park System are facing a wide range of problems. The causes of these problems are equally wide-ranging and involve inadequate funding, misplaced budget priorities, overcrowding in some parks and some times, too few personnel, incompatible development outside park boundaries, and more. All of these problems seriously threaten the state of the National Park System. In the past few years, beginning with the publication of the State of the Parks Report in 1980, there has been a much greater awareness of the problems and their causes. To date, however, there has been too little done to mitigate and eliminate these problems. The challenge of the next few years will be to make a concerted effort to resolve as many of these problems as possible.

In addition to dealing on a case-by-case basis with the various specific problems arising day-to-day, the Service and the System would greatly benefit from a long range plan to guide their efforts for the future.

In September, 1981, NPCA convened a national conference on the State of the National Parks. During this conference, NPCA issued a challenge to the National Park Service, urging the development of a comprehensive National Park System Plan. NPCA presented the outline of a comprehensive proposal to the NPS which built a strong case for the urgent need for such a plan. Significantly, for the 112 year history of the national parks, no such comprehensive long-range plan has ever been done by the Service or by any other entity.

A "Comprehensive National Park System Plan" would include these elements:

1. Identification of the gaps in the System, and a process for identifying appropriate sites to fill the gaps.
2. A review of all current boundaries of existing units of the System to determine their adequacy, and specific recommendations as to needed improvements.
3. A process to identify, evaluate, and prevent/mitigate threats to the natural and cultural resources of the units of the System.

4. A prioritized program for the completion of general management plans for all units of the System.
5. A systematic and prioritized evaluation of the scientific research program and needs of the Service.
6. Systematic evaluation of the land acquisition needs of the System, with priority placed on both resource threats and hardship conditions.
7. Evaluation of the staff needs of the Service, both in terms of the number, type of training, and distribution among central and field offices of employees. Attention should be paid to permanent, seasonal, volunteer, and youth employment programs.
8. Evaluation of the current and projected levels, methods, and types of use of park resources, including such factors as overuse, accessibility, internal transportation, carrying capacity, and inappropriate recreational activities.
9. Review of the NPS interpretation program, with a specific emphasis on the need to improve and upgrade the role of interpretation in parks, and to expand the NPS outreach through environmental education activities.

In 1984, NPCA began the preparation of such a National Park System Plan. We will soon complete our work and will present our recommendations to the NPS and the public. In the meantime, we are greatly encouraged by the recognition of this need which Director Mott has already demonstrated in his 12 Point Plan, and in his many public statements on the matter.

Working together, concerned citizens, the professionals in and out of government, and our Nation's leaders in the Congress can act to alleviate the problems facing the national park system as we proceed into the 21st Century. We hope and trust that this spirit of cooperation will be found, and that the System which we pass on to future generations will be even better than it is today.