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February 17, 2006

The Honorable Gale Norton  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C St NW  
Washington, D.C. 20240-0001

Dear Secretary Norton:

I am writing to express my opposition to the Department of the Interior's proposed revisions to the National Park Service's Management Policies. I have repeatedly expressed my objections to these proposed revisions and I urge you to consider my concerns again in connection with the public comment process.

First, I question the necessity of the proposed revisions. Policy changes should address significant, legitimate, and defined problems confronting the Parks. To rewrite the management policies when there are no such problems is both irresponsible and a waste of the public's time and resources. Given that the Park Service's core mission of conservation has effectively protected our national treasures for almost 90 years and that visitor satisfaction at the National Parks is overwhelmingly positive, I see no need to cast aside the core mission and tested policies in favor of unneeded, risky, and ambiguous revisions. We should not waver in our promise to protect our national treasures for future generations.

In addition to this fundamental objection, I have four specific concerns pertaining to the proposed changes of the management policies and their impact on our National Parks. These concerns are for: (1) the National Park Service's founding mission; (2) motorized vehicle use in our National Parks; (3) the views, sounds, and clean air of our Parks; and (4) the outlook for wilderness in the National Parks.

### **1. The National Park Service's Founding Principles**

The 1916 Organic Act and the existing management policies unambiguously provide that conservation of park resources is the National Park Service's primary purpose. Management Policy 1.4.3, "The NPS Obligation to Conserve and Provide for Enjoyment of Park Resources and Values," states in part:

“Congress, recognizing that enjoyment by future generations of the national parks can be ensured only if the superb quality of park resources is left unimpaired, has provided that when there is a conflict between conserving resources and values and providing for the enjoyment of them, conservation is to be predominant.” (Emphasis added.)

This obligation to make the protection of resources the first priority is inherent in the culture and work ethic of every Park Service employee and is the reason the National Park System attracts so many visitors. The proposed changes to the Management Policies weaken this mandate. In the revised draft policies, the above language is deleted and replaced with language that elevates the importance of public enjoyment to the same level as resource protection. This shift is not only unnecessary (visitor satisfaction in the parks is already greater than 95%) but it creates dangerous ambiguity about the Park Service’s mission. The Park Service should reject the changes proposed to Chapter 1 of its management policies.

## **2. Motorized Vehicle Use**

The current National Park Service policies acknowledge the challenges that motorized vehicles present to superintendents who are charged with protecting park resources. They state that: “The variety of motorized equipment . . . that operates in national parks has the potential to adversely impact park resources, including the park’s natural soundscape.” The current policy manual goes on to provide park managers with specific guidelines for regulating motorized uses of the parks, including guidelines for protecting soundscapes and limiting the impacts of roads.

I am troubled that the proposed revisions to the management policies would eliminate goals pertaining to motorized vehicle use. The language above has been deleted in the proposed version, as have specific reference to types of unacceptable off-road vehicle impacts. These changes, and many others, seem aimed at creating ambiguity and confusion for park managers who must determine whether off-road vehicle use and other motorized equipment will interrupt, harm, or conflict with natural sights and sounds. These changes appear to have been drafted by someone who wants to use the popularity of motorized recreational vehicles as a justification for allowing them in National Parks. Given our duty of protecting the Parks in perpetuity, it is utterly irresponsible to throw the Parks’ gates open to motorized uses in this way. There is no need to discard existing language which has proven effective in allowing limited mechanized use while protecting park resources.

## **3. Views, Sounds, and Air Quality**

The single biggest challenge facing park managers is preserving those attributes that make our National Parks so popular and that inspired our forefathers to set them aside. These attributes include the clean air, clear views, and natural sounds of our national treasures.

Park managers are confronting air pollution issues across the park system, particularly in Acadia, the Great Smoky Mountains, and the Grand Canyon. Noise pollution, meanwhile, also continues

to spread further into our open spaces. Our National Parks are among the last places in America where a person can enjoy the unhindered sounds of the natural world.

As our park managers continue to work to protect these qualities, it is important that they have the legal support of their management policies. The proposed policy revisions, however, undermine the current protections for air quality, views, and soundscapes in two ways.

First, the proposed revision would demote clear skies and natural soundscapes from the list of “natural resources” that are entitled to protection (equal to soil, water and other physical resources) to an “associated characteristic,” which is not so clearly entitled to protection. The term “associated characteristic” is not defined or used elsewhere in the draft. The proposed management policies also would eliminate the term “highly valued” to describe those associated characteristics. These modifications imply that air quality, views, and soundscapes are not entitled to the same protections as other resources in the park.

Second, the definition of the term “natural condition” has been altered. The new definition could allow some forms of man-made pollution to be considered part of the natural visibility in national parks. This substantially weakens the standard the National Park Service must apply to manage and protect park air resources.

This shift would have broad effects, particularly upon those states that are now writing plans (SIPs) to implement the Clean Air Act’s mandate to remedy all existing impairment of park visibility caused by man-made pollution. In this process, states are defining “natural” visibility conditions for the parks. By redefining the term “natural” to include impacts caused by human activities, however, the proposed management policies weaken the standards to which point sources would have to adhere in mitigating air pollution near National Parks.

#### **4. Wilderness**

The National Park Service manages more designated wilderness than any other federal or state agency, preserving unparalleled opportunities for Americans to enjoy their public land in its natural condition. Millions of additional acres within the park system are suitable for wilderness designation. Though the Wilderness Act sets forth a designation process for these lands, many of these potential wilderness areas are backlogged in the review process.

Rather than improving the designation process, reducing the review backlog, or strengthening the protections of these potential wilderness areas, the proposed policies take three major steps backward.

First, the proposed policies roll back existing provisions that aim to reduce backlogs in the wilderness review process. The Park Service’s 2001 Policies attempt to ensure that reviews are completed in a timely manner by including clear language and timelines for the review and recommendation of lands for designation. Unfortunately, the proposed revisions restrict the category of lands to be reviewed, eliminate any timeline, and shift the obligation to initiate review to individual park superintendents.

Second, the proposed revisions eliminate and weaken interim protection for lands deemed suitable for wilderness by the Superintendent, Director, Assistant Secretary and Secretary but not necessarily recommended by the President to Congress. Whereas the 2001 Policies manage as wilderness all lands at any step in the process (except those deemed suitable by the superintendent), the proposed revisions state that only those lands the President recommended to Congress will be managed pursuant to this chapter.

Third, the new policies open the door for motorized vehicle use in areas under consideration for wilderness designation. In its statement that "non-conforming uses" may continue at existing levels in "eligible" and "study" areas pending completion of the study, the proposed policies would allow uses that could degrade the wilderness character of potential wilderness areas.

For the millions of Americans who visit our National Parks each year – and who have overwhelmingly positive experiences – the views, sounds, clean air, and wilderness qualities of the parks are fundamental to their enjoyment of our national treasures. These assets deserve the protection they were assigned in the Organic Act, and which they have received from the National Park Service over its long history. They deserve better than an unneeded, ambiguous, and destabilizing overhaul of the National Park Service's management policies.

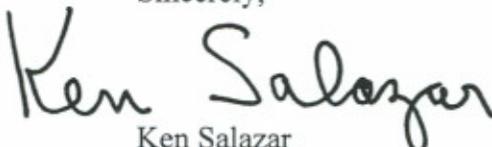
In addition, I continue to be troubled by the manner in which you are accepting public and employee comments. Apparently, citizens were able to attend meetings to discuss the draft policies, but could not register a formal comment with the agency at those meetings. It would be helpful to get further clarification on the intent of those meetings.

Furthermore, I understand that the employees who report to the Intermountain Regional Office will not be allowed to directly comment on the Management Policies and instead may have their comments filtered by the regional office for consistency. Every employee should be able to submit their comments so they can share their expertise and insights on how the Management Policy changes will affect their position and park unit.

I look forward to continuing to work with you as you consider whether these proposed changes to the Park Service's management policies are in the public interest.

I also request that any modification of the existing Park Service Management Policies as a result of this comment period be again made available for comment.

Sincerely,

A handwritten signature in black ink that reads "Ken Salazar". The signature is written in a cursive, flowing style.

Ken Salazar  
United States Senator

Cc: Director Fran Mainella