Statement for Reporter Teleconference Philip R. Brueck

Member, Executive Council Coalition of National Park Service Retirees October 14, 2008

I'm Phil Brueck, a retired National Park Service (NPS) manager, currently serving on the Executive Council of the Coalition of National Park Service Retirees. The 675 members of this Coalition are all former employees of the NPS with a combined 19,500 years of stewardship of America's most precious natural and cultural resources. The Coalition counts among its members, former NPS directors and deputy directors, regional directors, superintendents, rangers, and other career professionals who devoted an average of nearly 30 years each to protecting and interpreting America's national parks. For more information on this organization go to: www.npsretirees.org/

My father was also employed by the National Park Service and as a result, I grew up in the national parks, spending most of my youth living inside Zion National Park in southern Utah. Working for the National Park Service myself for 34 years, took me from the California coast to the Washington office and back to Utah, beginning as a law enforcement ranger, through a number of mid-level and top park management positions, including the Deputy Regional Director for the Northeast Region of United States which included all of the parks from the Virginia - North Carolina line to Maine and as far west as West Virginia. I returned to Utah in 1996 working my last 9 years as the Deputy Superintendent for the Southeast Utah Group, which included management oversight for Canyonlands NP, Arches NP, Natural Bridges NM and Hovenweep NM.

Returning to Utah was both an exhilarating and disappointing experience. I was thrilled to be back home in these wonderful red rock areas, but saddened by the deterioration of many of the beautiful landscapes that I had wandered in as a youth. Throughout my career I continued to see mounting evidence of the miracle of the concept of national parks and the evidence of their need in our society as an ever-increasing population gobbled up the natural & cultural environments right up to park boundaries.

One of the striking things about the national parks in Utah, is that unlike most of the country, the lands around the parks are still relatively intact — in fact, much the adjacent lands managed by BLM and the U.S. Forest Service are of national park quality and visitors to the areas are often unable to distinguish between NPS and BLM lands because they are separated only by politically-drawn boundaries. It is also one of the reasons that several of us developed an existing proposal in the 1990's (Canyonlands NP Completion Plan) to add some of the adjacent BLM lands to Canyonlands NP so that all of the lands below the rim of the erosion basin were within the national park rather than being fragmented and undistinguishable as they are now.

Now some of the resources of these national parks are being threatened by the proposed actions of one of the sister agencies, the BLM, who seem to have a complete disregard for the national interest and integrity of their own landscapes, let alone those of the adjacent parks. We recognize

the mandate that the BLM has for providing and managing oil & gas leases on public lands, and the challenge that they have to mange for that use while providing some level of protection for the lands themselves. We are concerned, however, with the way that the current RMP planning process analyses thousands of fragments and losses, without 'looking up' to see the effect of all those on the whole!

We support the concerns expressed verbally and in writing by other groups, some of which are involved in putting this teleconference together, and would like to emphasize several of the issues that we think are critical to the integrity of the adjacent national parks:

The lack of Cooperating Agency Status awarded to the National Park Service

Given that <u>any</u> action on lands adjacent to a national park will have an effect, positive or negative, it is unbelievable to us that the BLM would not want to have the NPS involved formally as a Cooperating Agency so as to minimize or prevent damage to these national resources, as well as negating negative publicity from the millions of national & international visitors to these areas.. Much of the outdated or missing statistical information, such as air quality monitoring information at Canyonlands NP, could have been easily acquired had the BLM given more attention to NPS agency experts and input. While I personally have found that most of the BLM employees have great sensitivity and regard for the lands & values managed by their own agency and the National Park Service, this planning process appears to be politically driven at high speed by an increased interest in energy exploration, causing those involved in the RMP effort to shorten sound planning processes and avoid areas which might create increased planning time and effort — such as not granting the NPS Cooperating Agency status.

National Park Landscapes

Sadly, the methods used by BLM to evaluate management actions, including oil, gas, and mineral development, do not consider landscape values. The "Visual Resource Management" technique predicts scenic quality from the perspective of a person standing on a piece of land near a mining rig, rather than that of someone viewing the land from a distance — a value highly important to the mandate and integrity of adjacent national parks. The BLM even discusses this in the Monticello RMP but proposes little, if any actions to adequately address this.

Within the vast, internationally renowned landscapes of Utah, lie small islands that are the national parks; the adjacent BLM lands often form the backdrop or context for these areas. It is BLM land that we see through the "Windows" at Arches NP; we admire the BLM cliffs and monuments as we gaze outward from the Delicate Arch area. The views from the Island in the Sky in Canyonlands NP would be minor if it were not for the grand sweeping views of BLM land down in the erosion basin. Picture oil and gas development, and Potash mining within each of these viewsheds.

It is BLM land that entices us into the Needles District of Canyonlands NP through the leafy charm of Indian Creek, along the stunning Wingate Cliffs and under the Six Shooter peaks. Part of the Canyonlands experience is the challenge of traversing the remote wilderness-like BLM

lands in order to visit the Maze District on the west side. Here lie tracts of lands containing potential impacts from tar sands, uranium prospecting and mining.

The BLM lands that surround Hovenweep NM give the ancient ruins their pristine setting and provide park visitors a real sense of what the Ancestral Puebloans saw. The drive to Natural Bridges NM across gorgeous expanses of BLM land on Cedar Mesa is a major part of what visitors to the monument treasure.

The official designation of 19,800 miles of off-road vehicle routes in the areas encompassed by the RMP's will adversely affect the landscape in all of these areas. These routes already scar the landscape with linear tracks and dust plumes that can be even more noticeable at great distances than the structures related to oil and gas development. The RMP's should propose actions for decreasing or eliminating these impacts and enhancing the resources, rather than just legitimizing their existence.

Picture a landscape with road scars everywhere, drill pads, and dust, visitors traveling rural roadways in RV's and campers negotiating space with large trucks carrying waste and acquired minerals. Disposal sites nearby for liquid wastes from drilling operations have the potential to release volatile toxins into the air — of particular concern since both Arches and Canyonlands NP's are categorized as Class I air quality sites, an increasing rarity in our country, and a fact that the RMP's give little regard to.

Noise

It is very difficult in today's world to get away from high ambient noise levels and experience real natural quiet — something that the national parks have always been protective of. In recent years, however, it has become more important to visitors as well, and they have often expressed how grateful they are for places like Arches and Canyonlands and other national parks as special places where one can 'hide' from the noisy urban environments. One of my partners on our Executive Council told me this week one of his favorite hiking places used to be near Vernal, but after the area was leased for oil & gas extraction, he was amazed to find it virtually impossible to avoid the sounds of their equipment (compressors and drilling rigs) that could be heard literally for miles. It is a fact that in the narrow canyons found in southern Utah, noise from any source is often amplified and carried for long distances. Nothing in the RMP's adequately addresses this concern, especially the cumulative affects of numerous leases and routes in the various locations.

Night Sky

Many of the parks in Utah, especially Arches NP and Canyonlands NP are becoming a destination for those wishing to experience the skies of past generations — void of manmade lighting or intrusion. It is not unheard of to find a hundred visitors hiking to Delicate Arch at night because of the undiminished views of the stars and planets. I realized in moving back to Utah, that I had forgotten what the Milky Way looked like because of the lack of air quality and night vision in the east. Picture the effect of the lighting on mineral-extraction rigs, vehicles and adjacent operations as it diminishes the views of the stars and intrudes on the delicate night-time landscapes.

Off Highway Vehicle Management

Of particular concern is off-highway vehicle use in areas surrounding all of the national parks in Utah. On one hand we applaud the actions by BLM to substantially reduce the lands designated as "open" to OHV use and their designation of concentrated camping areas to avoid the waste and off-road use that came from the past allowance of indiscriminate camping. Unfortunately, the number of routes designated for OHV use as shown on the RMP maps is still extremely large and due to limited staffing, pretty much unenforceable (Governor Huntsman of Utah recently expressed concern for the extent of illegal OHV use across the state, much of which is on lands managed by BLM — see Salt Lake City Tribune, October 10, 2008). Someone visiting any of these locations will find that there are still other routes or tracks not shown on the map "signed" as approved routes (there are just too many to adequately portray on the small maps in the RMP's). Many of these routes 'dead-end' at park boundaries thus increasing (and somewhat encouraging) illegal use continuing across park boundaries into the parks.

In the time that I worked in southeastern Utah, the expansion of tracks and routes from illegal offroad use, particularly on the northeast side of Arches NP and near the Needles area of Canyonlands, was astonishing to experience. We at first sympathized with BLM because of their lack of adequate law enforcement staffing, but then were aghast when many of these illegal routes were then legitimized by the installation of BLM signs.

As one views the Route Designation Maps in the RMPs, it is difficult to understand why nearly 20,000 miles of routes are needed. If four routes lead to the same destination, are all really needed, especially when the overall impacts of the roads in a single location are cumulative in nature? With limited BLM staffing and adequate protective measures missing in the RMP's, we fear that the illegal and legal off-highway vehicle use will continue as before or even increase, with significant damage to soils, vegetation, cultural resources, visual resources, and air & water quality.

The effects of the actions proposed in the BLM RMP's, either for land and mineral extraction or for needed mitigation efforts, are wholly inadequate and must be eliminated or revised as they negatively affect the health and integrity of the superb BLM lands and the adjacent National Parks.

The roads, the dust, the light, the noise, and the smog may change these places forever! Is that what we as a nation really want? We don't think so!