



June 29, 2014

Senator Mark Udall  
Hart Office Building Suite SH-730  
Washington DC 20510

Representative Scott Tipton  
218 Cannon HOB  
Washington, DC 20515

Dear Senator Udall and Representative Tipton:

The National Parks Conservation Association is very pleased with the acknowledgment and recognition that the unique and remarkable landscape of Colorado National Monument is worthy of consideration for national park status. We have been very impressed and pleased with both the efforts you have initiated to promote broad public engagement in consideration of this change in status and also the level of civic participation this has engendered. Please know that we are supportive of your efforts to establish this extraordinary landscape as America's newest national park.

Colorado National Monument is unusual in that it is an "urban park". With a growing community at its base, it rightfully is a critically important recreational resource for the citizens of Mesa County and most certainly a source of great civic pride and economic value. Nevertheless, it is a place of national significance as a unit of the National Park Service. It is therefore a special landscape whose welfare and protection are of interest to all citizens of our country. Change in status and on-going management responsibilities are of interest and concern for the entire country, as well as the local citizenry.

We have carefully reviewed the draft of a proposed bill prepared by the Mesa County citizens drafting committee and have some significant concerns with several of the recommendations. Despite our support for national park designation, several elements in the draft language, if incorporated into a formal bill, would preclude our willingness to support the bill as proposed.

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## Concerns

### Advisory Committee

Certain elements in the formation of an advisory committee are a significant source of concern. On the face of it, an advisory committee for the Superintendent sounds reasonable. In fact, it is not necessarily without precedent. New units of the national parks system have incorporated advisory groups, generally for the purpose of facilitating the establishment of new management plans. Provisions for sunset of the advisory group are then incorporated into the language of the legislation.

That the duties of the Advisory Committee are defined to provide direct engagement with the Secretary of the Interior on matters related to implementation the management plan on an annual basis is an overreach. The administration of the park is and should be the responsibility of the Superintendent. It would be very appropriate for an advisory group to provide perspective and insight on park related issues – directly to the Superintendent. The scope of this advisory function should be scaled back considerably.

Additionally, the composition of the Advisory Committee is also a source of concern for us. We believe that the representation should be broad, comprehensive and widely representative. We have closely monitored the community wide exchanges in recent years as to the appropriateness of park management decisions. As you may know, we have weighed in a time or two in support of specific actions. We believe it is extremely important for park management and community interests to have consistent and honest exchanges on park related matters. This should be a priority and should be the norm whether there is a legislatively sanctioned advisory committee or not. It is also important for the community to recognize the priorities and responsibilities the National Park Service must assume. It appears to us that the management responsibilities that include preservation, protection and enhancement of visitor enjoyment in a responsible manner are not well understood. If there is a temporal Advisory Committee, we believe an additional role should be helping the NPS to communicate clearly their responsibilities and authorities to the community as well.

In summary on this important point, we recommend:

1. Scaling back the scope of the committee to work directly with the Superintendent, not the Secretary of the Interior;
2. Specifically define the primary task to assist with development of a new management plan;
3. Inclusion of a sunset clause;
4. Provide a broader, more comprehensive representation of advisory members to reflect many community interests;

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5. The committee should be tasked with a responsibility to work directly with the larger community to help communicate the role and responsibility of park management challenges and to support specific National Park Service authorities, as well.

#### Buffer Zones and Adjacent Uses

Unfortunately, this is a term that is sometimes misunderstood. A unit of the national park system is not just an island of protection – it is part of a larger landscape. Adjacent land uses and diffused impacts such as air quality, water related issues, light and sounds emitted within and adjacent to the park boundaries are also important considerations. Language in the draft seems to suggest that nothing outside the park boundaries should be considered in the interest of park management and protection. We disagree with this premise and would feel strongly that language to that effect would be a bad precedent for Colorado National Monument much less a national park. We believe that there can and should be a process for review of adjacent development that may impact intrinsic national park values such as clean air, light and sound pollution.

#### Air Quality Classification

We recognize that the existing Class II designation for the area would not be changed as a result of any national park designation. Nevertheless, language in the draft suggests that any re-designation be initiated only at the request of local and state agencies. We believe this would set a bad precedent and should not be included in the language of any national park bill.

#### Concluding Thoughts

Despite the concerns with some element of the draft bill we raise here, we believe that Colorado National Monument has requisite qualities to be considered for national park status. It is our belief, however, that a change in status that requires Congressional review and approval warrants something that adds values or enhancement of some form to the park unit. As noted, we believe that the proposed draft bill actually diminishes the special status reflected in our national parks. In addition to what may be considered more limits and constraints for management, there is not really anything proposed that is new. In the past, most national monuments that have been elevated to national parks status by Congress have included something more. This may be more land added to the park, some change in designation of wilderness within the boundaries or some other enhancement. I would imagine that Congress would want to know what is new or different that warrants a change of status. We propose consideration of an appropriate enhancement of some manner, increased size, protection or designation that would warrant such a change in status.

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We applaud your leadership in considering what would be an important legislative recognition of the special qualities of Colorado National Monument. We are also very encouraged and complement the strong level of commitment and dedication to find an appropriate way to protect, enhance and celebrate a profoundly special American landscape. We look forward to working with both of you and the Colorado delegation as well as the larger Mesa County community in formalizing a respectful legislative initiative.

Sincerely,

David Nimkin  
Senior Regional Director  
Southwest Region  
National Parks Conservation Association

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