

# "Borrowing" Trouble

*Editor's Note: The following article, while it does not describe scientific research, certainly has resource management as a central theme. It came from **Einar S. Olsen**, Senior Environmental Protection Specialist with the NPS Washington Office of Mining and Minerals Branch and focuses the management spotlight on a problem heretofore not dealt with in these pages.*

Imagine this situation. You pull your car into a park overlook area. You have great expectations for the view of the broad valley and rugged mountain range, which rises abruptly on the valley's far side. But the scene and serenity are disrupted by a most *unexpected* obtrusion – a gravel operation, located in the floodplain of a river that bisects the valley. The noise from the stone crushing equipment and the constant arrival and departure of trucks hauling gravel to and from work sites is impossible to ignore. The view seems washed out, due to dust from the operation; the waters downstream are not as clear as those above the pit.

This is not an inholding or even a non-federal mineral operation on federal land. This is a National Park Service administrative borrow material site.

While this illustration may exaggerate somewhat, in-park use of borrow for administrative purposes is marring scenic views and needlessly damaging park resources. Borrow sites provide needed sand and gravel for park projects, including road, trail, and building construction and maintenance. Yet poorly developed and reclaimed borrow sites can have significant impacts on park resources, including degradation of water quality and stream channel stability, degradation of aquatic and terrestrial habitats, creation of conditions that promote invasion of exotics, disruption of wildlife, destruction of cultural resources, and the jarring of visitors' experiences.

While the Service is usually diligent in its protection of resource and visitor values, we do not always apply the same level of scrutiny to NPS projects that we apply to threats caused by others. This may result from

the belief that since the project is being conducted by NPS, the impacts *must* be minimal or nonexistent. Unfortunately, in the case of administrative borrow sites, this has not been the reality. At several such in-park sites the NPS has violated the Clean Water Act and been ordered to cease operation.

Of several reasons for these shortcomings, one may be a result of problems with interpreting NPS *Management Policies*. Another may be the desire, for economic reasons, to use the closest gravel source. Also, local governments may pressure parks to use in-park sources so as not to deplete gravel sources in the surrounding communities.

NPS use of in-park borrow has not gone unnoticed by the conservation community. Non-governmental organizations always have advocated that administrative borrow sites should not exist in parks at all, regardless of importation costs of materials from other sources. Further, these organizations claim the NPS has violated various environmental laws and failed to follow its own policies.

As a result, the NPS Director issued *Special Directive 91-6* on Aug. 5, 1991, providing direction to parks on in-park use of borrow. The Directive's purpose is to ensure that all necessary issues, including economics, are considered prior to developing borrow pits, and that decision making is well thought out by park managers. The policy direction for the Directive comes from NPS *Management Policies*, Chapter 9, Page 4.

The Directive was prepared by a work group consisting of individuals from park natural resources and maintenance divisions, Regional Offices, Denver Service Center, WASO Water Resources Division, and WASO Mining and Minerals Branch. The final version was approved by the Director after being reviewed by the Regional Offices and parks.

The overall responsibility for implementing the Directive rests with the parks. If you have questions regarding it, please contact me, Einar Olsen, Mining and Minerals Branch, WASO, at 202/343-4968.