



United States Department of the Interior

NATIONAL PARK SERVICE

ROCKY MOUNTAIN REGIONAL OFFICE

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NOV 15 1988

L1417 (RMR-D)

Memorandum

To: Superintendents, Arches, Badlands, Bryce Canyon, Canyonlands, Capitol Reef, Grand Teton, Mesa Verde, Rocky Mountain, Theodore Roosevelt, Wind Cave, Yellowstone, Zion National Parks; Black Canyon of the Gunnison, Cedar Breaks, Colorado, Custer Battlefield, Devils Tower, Dinosaur, Florissant Fossil Beds, Hovenweep, Jewel Cave, Natural Bridges, Timpanogos Cave, Yucca House National Monuments; Mount Rushmore National Memorial; Fort Laramie, Fort Union, Golden Spike, Grant-Kohrs Ranch, Knife River Indian Villages National Historic Sites; Bighorn Canyon, Curecanti, Glen Canyon National Recreation Areas

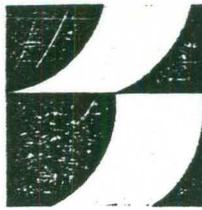
From: Regional Director, Rocky Mountain Region

Subject: Boundary Recommendations Contained in National Parks and Conservation Association (NPCA) Report "Where We Draw The Line"

Enclosed for your advance information is a copy of appropriate parts of the subject report for your area. As soon as we receive a copy of the New Area Report, we will forward them to you as appropriate.

Lorraine Mintzmyer
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Enclosure



NPCA Boundary Study: Methodology and Conclusions

NPCA's Boundary Study arose from a long-standing need to examine the adequacy of the boundaries of existing units of the National Park System. One purpose was to analyze each natural and cultural area to determine if boundary adjustments were needed either to incorporate significant resources outside of boundaries, or to better protect resources already within. Another purpose was to examine the process by which boundaries are established, and determine if it is an effective method to ensure the protection of resources. There is a general belief that once a park is established, the preservation of resources within it is assured. However, through this study, NPCA has determined that the boundaries at many parks do not reflect the distribution of the primary resources, ensure their long term preservation, or provide for their most efficient management.

The park-specific recommendations contained in this report have been developed from extensive surveys, site studies, and interviews with National Park Service personnel, resource scientists, and conservation professionals. Using both maps and descriptions, the study illustrates the boundary inadequacies of more than 175 units of the National Park System. Distinct from traditional efforts to amend boundaries for parks, this report emphasizes the importance of protecting resources in perpetuity, regardless of present perceptions of political and economic feasibility. The proposed adjustments are neither exhaustive nor absolute. They reflect a more desirable configuration, but will enhance the Park Service's ability to conserve America's heritage in perpetuity. In a few cases, no boundary adjustments were proposed, but concerns were expressed relating to the boundary of a park.

NPCA's study revealed that 69% of the boundaries of primarily natural areas and 41% of the primarily cultural areas of the park system need adjustment. The greatest concentration of parks needing boundary reconfigurations are in the Western (75 percent) and Rocky Mountain (73 percent) regions. There were four major reasons for these adjustments: (1) to include resources pertinent to the theme of the park; (2) to protect resources within boundaries and related resources outside boundaries from adjacent activities; (3) to preserve the integrity of the view from within the park (viewshed); and (4) to improve park management.

This study found that more than 40% of the parks need boundary adjustments to preserve pertinent resources. Natural parks in particular have been poorly configured to include such resources. NPCA's study determined that over two-thirds of the natural areas do not adequately include primary resource systems. Inclusion of complete ecosystems and watersheds is the leading resource reason for boundary adjustments for natural parks. More than 50 percent of the natural parks in each region, with the exception of the Southwest region, need boundary realignments to include pertinent resources.

The inclusion of geological and scenic features was the second most frequently cited resource-based reason for boundary adjustments to natural parks. More than one-quarter of the natural parks in the system need their boundaries redrawn to include related geological systems and features. Eight out of the ten regions have parks that need ad-

justments to include such features, the greatest need being in the Western region where nearly three-quarters of the natural parks have significant geologic or scenic features omitted from their boundaries.

The inclusion of pertinent resources also figured prominently in the proposed adjustments to parks with cultural or historical themes. More than 25 percent of the cultural parks in the system, or close to 60 percent of those needing changes, have boundaries that neglect resources significant to their mission.

Legislation often fails to include significant resources because there is not a consistent process to aid Congress in the identification of appropriate park boundaries. There are no guiding principles and no established objectives and rarely is complete resource data gathered before a boundary is sought. Consequently, the lack of a consistent process for determining boundaries based upon resource-oriented criteria means that economic and political concerns, albeit important, often override resource needs, and the boundary does not embrace all the pertinent resources.

Protection of the scene surrounding a park--maintaining the integrity of its setting--was cited as a reason for a boundary adjustments at more than half the cultural parks and one-quarter of the natural parks being recommended for boundary adjustments. For both natural and cultural parks, incompatible residential and commercial development was most frequently cited as the threat to the park's scene (15% of natural parks and 18% of the cultural parks recommended for boundary change.) Virtually every park official and private citizen who NPCA contacted during this study expressed concern about lands adjacent to parks. Today, parks are increasingly becoming islands amid a sea of development. Documentation of the types and effects of adjacent land use is being developed at several of the more embattled parks, including Everglades National Park and Yellowstone National Park. In addition to the big natural areas, Revolutionary War and Civil War battlefields--particularly those in northern Virginia, Pennsylvania, Maryland and Massachusetts--are rapidly being encroached upon by urban sprawl. With the possible exception of Pea Ridge, there is not a single battlefield site free from development pressures.

More than two-fifths of the parks also need adjustments to improve administration. This is particularly true in the Western region where almost half of the parks were identified as having administratively difficult boundaries. When boundaries are established along straight section lines, oftentimes a cliff or a watershed can be bisected, resulting in management difficulties. The most prevalent administrative reason for a change was to make the park's boundary more readily identifiable by the public.

Although the vast majority of adjustments to the system are additions, deletions and exchanges have been proposed for 6% of the parks for which boundary adjustments have been proposed. One third of these deletions and exchanges occur in the Alaska region and improve the boundaries of areas established by the Alaska National Interest Lands Conservation Act (ANILCA).

Following the publication of this study, we would hope that both the National Park Service and Congress would undertake a systematic and comprehensive review through the traditional NPS study and report-to-Congress procedure. This should be followed by careful consideration by appropriate committees of Congress.

Undoubtedly, there are those who will view the boundary recommendations contained in this report with skepticism--believing they are neither politically or economically feasible. In some cases they may be right. In other cases they will be wrong. But in one sense it does not matter. For what is needed is a vision--a vision of the National Park System and a vision of the future.

This report is framed with that vision, although it is but a modest beginning. Freed from the myopic constraints of some administrations and some members of Congress and the bullying reins of exploitative groups, we found general agreement within and outside the Park Service that existing park boundaries, and the process for establishing them, must be improved.

We cannot let this opportunity pass. And we must not believe those who think it has. Ours is a nation endowed with majestic natural treasures and a grand cultural history. The National Park System preserves a slice of these resources, and the National Park Service, as the steward of those resources, has a duty to past, present and future generations alike to see that the integrity of those resources is preserved--for all people, for all time. Neglect that duty, ignore this study, or acquiesce to those who do and surely we will see these areas diminished until little of their original integrity remains.



Introduction

With the passage of the Yosemite Act in 1864, a new concept, unique to the United States of America, began to emerge. It was not the beginning of the national park system, or the first time that lands had been reserved by the federal government. The significance of the Yosemite Act was that for the first time the federal government acted to establish a protected public park. The Yosemite Valley was a spectacular slice of natural America in which all citizens of present and future generations would share a vested interest and which, therefore, was worthy of protection.

It is the will of the nation as embodied in the act of Congress that this scenery shall never be private property, but that like certain defensive points upon our coast it shall be held solely for public purposes.

*-Frederick Law Olmsted
on the 1864 Yosemite Act.*

The objective of the Act, however, was not the protection of the valley in its entirety. The Act was not designed to protect the watersheds that fueled the cataracts or the variety of animals that inhabited the area, nor did it preserve the sweeping views from the mountain crests, or the area's wild character in general. The Yosemite Act had the singular purpose of demarcating the visually spectacular waterfalls, gorges, and high granite peaks. And like the frame of an Italian masterpiece, the boundaries of the park were set in a near perfect square around its most dramatic features.

The boundary establishment process of the 1864 Yosemite Act is indicative of the way many early parks were laid out. Ecology had nothing to do with it. A park boundary was meant to encompass the most remarkable topographic features of the area rather than to protect them. Moreover, boundaries were set so as not to jeopardize the economic potential that surrounding lands might hold for ranchers, farmers, miners or developers.

It was not until 84 years after the Yosemite Act, with the establishment of Everglades National Park in 1948, that a national park was designated explicitly to protect wilderness and a natural ecosystem. Even in that case, Congress failed to include the entire ecosystem and consequently, over the years, the natural flow of fresh water into the park has been manipulated by outside development to the point that the protection of the park's primary resources is jeopardized.

Similarly, the boundaries of many historic units have been drawn to encompass only sites of significant human activity. At Gettysburg National Military Park, for example, Civil War veterans identified battle sites worthy of preservation. Rarely were there attempts to preserve historic scenes or viewsheds which many people agree are equally valuable components of the parks. It simply was not necessary, since nearly all such battles were fought in rural areas. However, few people could have envisioned suburban encroachment on these areas. At Minute Man National Historical Park, for example, visitors are greeted by the presence of a factory immediately adjacent to

the park and then must contend with the heavy volume of commuters that use the historic road through the park on their way to and from Boston.

The absence of a thoughtful planning process has resulted in various strategies of federal protection depending upon the extent of perceived external threats when a park boundary is established. In some areas, like Chickamauga and Chattanooga National Military Park, the federal government sought to own most of the significant battle lands; in contrast, at Antietam National Battlefield, a small land base with scenic easements became the preferred protection mechanism. As this and similar examples in the study illustrate, today's visitor may have a difficult time recreating a sense of the historic scene due to extensive and incompatible commercial and residential development at the edges of many historic sites.

The role of the national park system and the science of resource management have undergone dramatic transformations since the National Park Service was formed in the early part of the 20th century. Park managers now understand that for any particular resource there is a large and complex system with which it interacts. Physical, biological and cultural resources are inextricably related. The summer wildlife of Yosemite cannot be protected without protecting its lower-elevation winter habitat as well. Nor can the historic scene in Cuyahoga Valley National Recreation Area be preserved without an understanding of the dynamics of the watershed. The protection of one component must address the conservation of the whole.

Even if, in the beginning, there had been an understanding of the complexity of natural and cultural systems, it is doubtful that important related areas would have been included. There was simply no need. Far removed from the cities and largely inaccessible to development, the early parks were naturally protected by their isolation or conveniently buffered by compatible land uses. Yet the early planners of the national park system could not have predicted the tremendous growth that this country would sustain, or the level of significance that the park system would play in the preservation of America's heritage. They could not have imagined the rapid development of new technologies or the pressures that would come to bear on the parks.

Unfortunately, hindsight has not provided foresight. For example, at Great Basin National Park, the nation's newest national park, the original boundary proposals were reduced so that the potential for mining and hunting in the area would not be jeopardized. The result is ironic--there is no "basin" in Great Basin National Park. Despite our increasing knowledge about ecosystems and resource needs, the boundary establishment process still often relies more on political horse-trading than on sound science.

A few innovative boundary strategies have been proposed over the years. In particular, at Shenandoah National Park, Congress developed three separate boundaries. The first was a 250,000-acre boundary considered to be the minimum suitable for establishing a national park; the second was a 385,000-acre boundary identified for eventual acquisition; the third was a 521,000-acre boundary designated as the maximum area within which properties could be accepted by donation. Not only did this approach give the Park Service a legal boundary from which to base its operations, but also provided a boundary that defined the entire primary resource. The park has yet to fulfill its

250,000-acre minimum boundary. However this does not diminish the importance of having laid out boundaries that would adequately protect resource systems.

Unfortunately, Shenandoah was an exception in park planning and design. The absence of a uniform, resource-based process for establishing park boundaries over the last 115 years has led to a park system with inadequate boundaries that are difficult to identify and manage. The criteria for establishing boundaries often seems to vary even within a single park. The boundary of Death Valley National Monument, for example, follows natural terrain features, section lines and state boundaries in a seemingly random fashion, leaving out significant natural resources and excluding the northern portion of the valley proper.

Instead of establishing logical resource-oriented boundaries in the first place, park managers inevitably are left to try to adjust the boundaries of parks when opportunities and needs arise. As a result, on a park-by-park basis, thousands of potential adjustments have been discussed by the National Park Service, Congress, private organizations and individuals over the years. To date, more than 500 boundary revisions have been authorized for nearly 200 of the parks. Though many of these adjustments have been relatively minor in size, most of them, especially in the last 20 years, have incorporated significant resources which existed outside park boundaries.

To date, the National Park Service has not made an attempt to review park boundaries in any sort of a systematic manner and park planning documents too often have ignored boundary issues. When boundary studies have been conducted, they are usually initiated by a regional office or by Congress, and even then only for individual units. There is one exception. In the early 1980s, the Chairman of the House Subcommittee on National Parks requested a boundary evaluation for every cultural unit in the system. Although the study was eventually stopped by the Administration, that effort reflected a process designed to address the adequacy of boundaries and needs of park managers to adjust their boundaries.

The reluctance of the Park Service to consider boundary issues in the past has been a grave oversight, if not a breach of its legal responsibility. Regardless of the natural or cultural boundaries of the park-related resources, the NPS has generally held that if resources lie outside the authorized boundary they are not an official management concern. There is a tendency for policy makers to follow range and township survey lines or other arbitrary lines instead of prominent topographic features of the land.

Mapping the Parks

Once boundaries are established, it is vitally important that they be easily identifiable both on the ground and on maps. An easily defined boundary is instrumental in enhancing visitor appreciation, ensuring wise management of the park resources and preventing conflicts between land management agencies and adjacent land owners. Where present, a nearby road, river or mountain ridge can serve as a natural boundary for a park. Currently, it is often difficult to identify the boundary on the ground, particularly when boundaries are drawn on section lines.

Map inaccuracy is also a common problem. One popular source for park maps is the United States Geological Survey (USGS). The USGS is the nation's central mapping agency and relies solely on information provided by the Park Service when illustrating park boundaries. But many of the maps depict no park boundaries, inaccurate boundaries or are outdated.

Further, there is no central office within the National Park Service that keeps up-to-date maps of the authorized boundaries of every unit of the national park system. And though the Division of Publications produces excellent schematic maps for most of the parks, they are geared specifically to the car-touring visitor and are of little value to backcountry users, planners, managers or scientists. Accurate maps are essential, and the National Park Service should develop standardized maps that depict the park boundary as well as significant natural and cultural resources.

Reaching Outside Park Boundaries

At various times in the past, pieces of park legislation have recognized that park boundaries are imperfect and that activities outside park boundaries can and do affect park resources. These areas outside park boundaries, variously known as "zones of influence" or "areas of concern," have rarely been identified on a map, much less on the ground. Although there has been discussion of the concept, only the legislation establishing the Santa Monica Mountains National Recreation Area and the effort to protect the "greater Yellowstone ecosystem" have come close to identifying such areas.

A similar idea was contemplated in the Clean Air Act and its implementing regulations. In defining the "integral vista," the Act recognized that one reason for the establishment of many of the parks was to ensure opportunities to view scenery, both natural and cultural, which extends beyond park boundaries. This purpose is specifically mentioned in the legislative history of Acadia, Shenandoah, Rocky Mountain, and Canyonlands national parks, among others, and is inferred for nearly all units in the National Park Service general statutes. Unfortunately, the Administration has vetoed an NPS proposal to designate such integral vistas, and the concept lies dormant.

Perhaps the closest existing concept to the "area of concern," although it covers only a narrow segment of the units of the park system, is the International Biosphere Reserve (IBR), a designation of the Man and the Biosphere program of the United Nations Educational, Scientific, and Cultural Organization. This IBR designation has already been applied to 25 units in the system, and in several instances it extends beyond park boundaries to include adjacent federal, state and private lands. Essentially, the concept provides for in-depth scientific study and intense management of the designated area, with the park serving as a "core" protected area. Surrounding lands are developed for human use, but managed compatibly. The IBR program envisions designation of at least one such area in each biosphere or major ecosystem around the world.

For the natural area units of the national park system, the Biosphere Reserve program offers a framework within which the "zone of influence" concept could be implemented. Following an intense, systemwide study by the NPS, biosphere reserves should be designated for each qualified natural area unit of the system, in close cooperation with adjacent federal, state, and private landowners.

Although the concept of a zone of influence transcends the traditional view of NPS responsibility, NPCA has concluded that simply adjusting the boundaries will not be enough to ensure adequate protection for park resources and the visitor experience. Many boundary changes are needed, as this study clearly indicates. However, detailed investigation of specific sites outside park boundaries must be undertaken to determine a park's zone of influence. The National Park Service should immediately begin an evaluation of lands around the parks which have significant potential for adversely affecting park resources. Both the statement for management and the general management plan should address this issue.

NPCA does not feel that it is necessary for NPS to control or dictate land use practices on adjacent lands. If other agencies controlling adjacent federal lands, such as the Bureau of Land Management and the U.S. Forest Service, are willing to take the needs of adjacent park resources into account in their decision-making, then simple cooperative agreements between these agencies and the NPS would suffice. On adjacent private lands, NPS should have the necessary tools, funds, and expertise to assist local governments in developing zoning codes that are compatible with park resource protection. Only in rare instances would the NPS have to resort to acquiring easements from unwilling sellers, although use of this tool may become commonplace on a willing seller basis.

Park resources are clearly threatened by incompatible land uses on some lands adjacent to parks. When the National Park Service or some private organization, such as NPCA, sounds the alarm about a particular adjacent land threat, the initiator is often taken by surprise, resulting in an unnecessarily large displacement of time and money, and the involvement of politics and the media. If a "zone of concern" were established around a park, mapped, and well publicized, potential users of these adjacent lands would know beforehand that the rules were somewhat different within the zone. Such knowledge could be sufficient to minimize potential use conflicts.

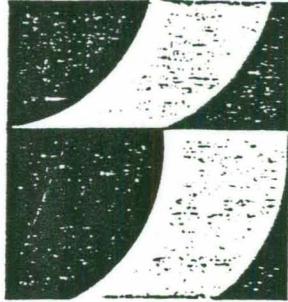
Conclusion and Recommendations

Although threats to park resources arising on adjacent lands are well known, opposition to a generic, systemwide solution to park protection has thus far prevailed. One admonition from opponents of park protection legislation has been that the standard response from Congress to a problem along the park boundary is to change the boundary. The NPCA boundary study will, in part, respond to this normal process of review for park protection needs.

This introductory section has presented some of the problems with the Service's current boundary establishment process. The general and site-specific recommendations which follow are designed to improve the current situation. NPCA is committed to their timely implementation.

- 1. Congress and the National Park Service should review the site specific recommendations contained in this boundary study and, to the maximum extent practicable, move to implement the additions to the authorized park boundaries.

- 2. When a park is authorized, the purposes of the park should be explicitly defined by Congress. Once the park is established, the NPS should identify primary natural and/or cultural resources using information from scientists and historians, regardless of political or economic constraints. The farthest range of park-related resources would define the "authorized" boundary of the park and serve as a logical limit to the interest and authority of the Park Service. From within the authorized boundary, Congress and park planners should develop a legal boundary, or acquisition boundary, that would serve as a land base from which the Park Service would administer the site.
- 3. The National Park Service should work with state and local governments to identify a zone of influence for each unit in the system, in order to maximize the ability of park managers to conserve the related resources of the park. Park planners and resource specialists should inventory the types and trends of land use within this zone and document their impact on park-related resources. Authority should be granted to NPS by Congress to provide incentives for cooperation (i.e. planning grants to local governments).
- 4. The National Park Service should recommend establishment of a biosphere reserve around each natural area unit of the system which meets UNESCO/MAB criteria.
- 5. A boundary analysis should be incorporated into the regular planning process of each park's general management plan as a statutory requirement. This analysis should identify the natural/cultural system of which the park is a part and determine the adequacy of the boundary to protect park resources.
- 6. When drawing the boundaries of proposed natural area parks, planners should attempt to align the boundaries along easily identifiable, topographic features such as geographic divides, in order to ease management of the park. For cultural areas, boundaries can often follow man-made features, such as roads, but should take the historic scene fully into account.
- 7. Following the model of United States Geological Survey topographic quadrangle maps, the Park Service should develop a standardized format for park maps that specifies data on land ownership boundaries, topography, hydrography, vegetation, roads and buildings, prominent physical features, and significant historic resources both within and adjacent to the park. Every park should have available copies of maps of their authorized boundary. Every regional office should have maps for every park within the region. Both the Denver Service Center and the Washington D.C. office should have a map of every unit in the system.



Rocky Mountain Region

Rocky Mountain Region Boundary Recommendations

Arches National Park, Utah
Badlands National Park, South Dakota
Bighorn Canyon National Recreation Area, Montana/Wyoming
Black Canyon of the Gunnison National Monument, Colorado
Bryce Canyon National Park, Utah
Canyonlands National Park, Utah
Capitol Reef National Park, Utah
Cedar Breaks National Monument, Utah
Colorado National Monument, Colorado
Curecanti National Recreation Area, Colorado
Custer Battlefield National Monument, Montana
*Devils Tower National Monument, Wyoming
Dinosaur National Monument, Colorado/Utah
Florissant Fossil Beds National Monument, Colorado
Fort Laramie National Historic Site, Wyoming
Fort Union Trading Post National Historic Site, North Dakota/Montana
Glen Canyon National Recreation Area (see Canyonlands National Park)
*Golden Spike National Historic Site, Utah
Grand Teton National Park, Wyoming
Grant-Kohrs Ranch National Historic Site, Montana
Hovenweep National Monument, Colorado/Utah
Jewel Cave National Monument, South Dakota
Knife River Indian Villages National Historic Site, North Dakota
Mesa Verde National Park, Colorado
Mount Rushmore National Memorial, South Dakota
Natural Bridges National Monument, Utah
Rocky Mountain National Park, Colorado

Theodore Roosevelt National Park, North Dakota
Timpanogos Cave National Monument, Utah
Wind Cave National Park, South Dakota
Yellowstone National Park, Wyoming/Montana/Idaho
*Yucca House National Monument, Colorado
Zion National Park, Utah
*No map

No Adjustment Recommended

Bent's Old Fort National Historic Site, Colorado
Big Hole National Battlefield, Montana
Fossil Butte National Monument, Wyoming
Glacier National Park, Montana
Great Sand Dunes National Monument, Colorado
John D. Rockefeller, Jr. Memorial Parkway, Wyoming
Rainbow Bridge National Monument, Utah

BRYCE CANYON NATIONAL PARK

Utah

ESTABLISHMENT: Proclaimed as Bryce Canyon National Monument June 8, 1923; authorized as Utah National Park June 7, 1924; changed to Bryce Canyon National Park February 25, 1928.

PRIMARY MISSION: Bryce Canyon was established to preserve the unusual scenic beauty of the colorful and intricately carved rock formations visible from the eastern edge of the Paunsaugunt Plateau and to protect area features of scientific interest and importance.

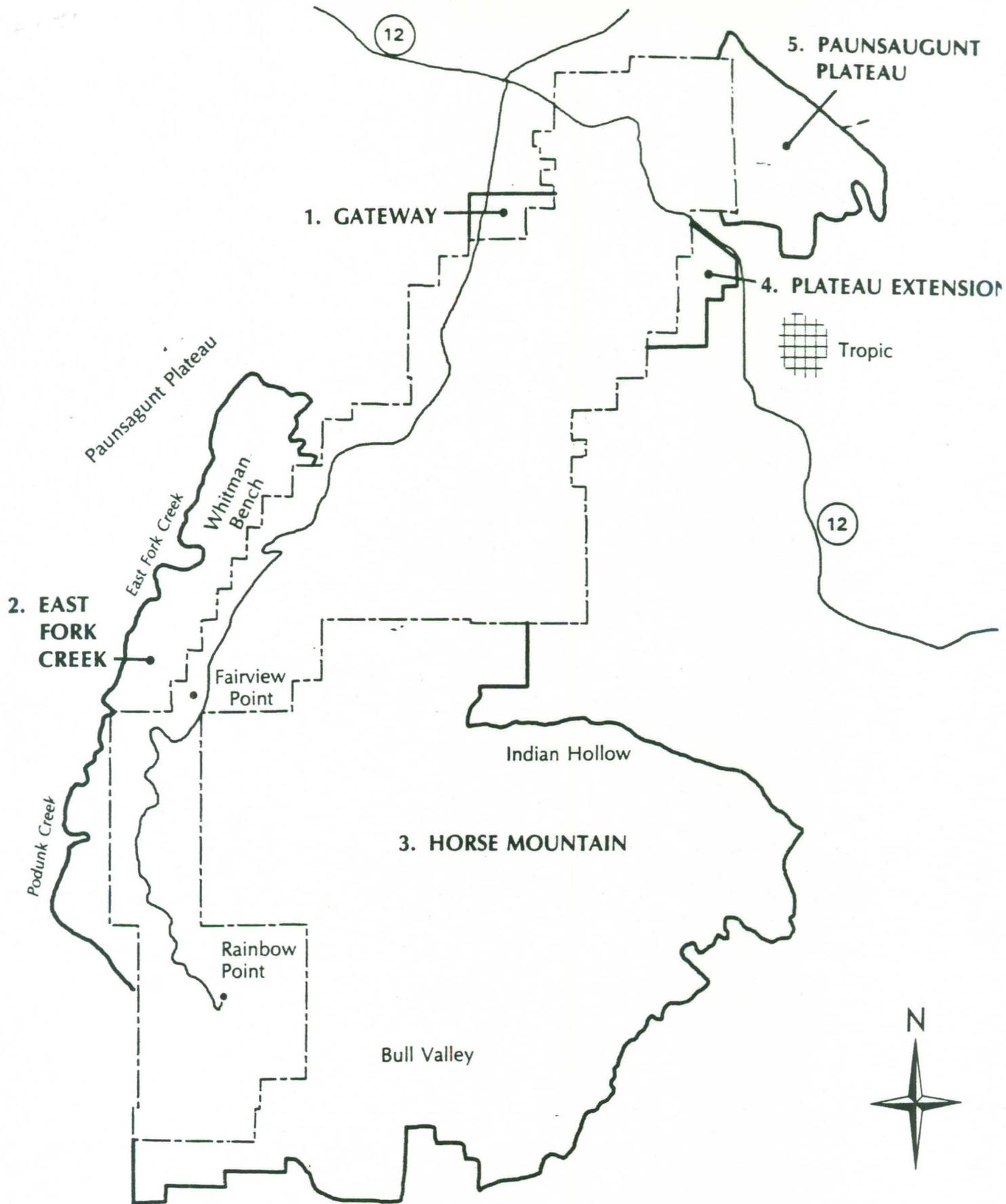
PREVIOUS BOUNDARY CHANGES: May 12, 1928; June 13, 1930; January 5, 1931; February 17, 1931; May 4, 1931; March 7, 1942.

RECOMMENDED BOUNDARY ADJUSTMENTS:

- (1) **Gateway:** This 780-acre area (public lands) along the park's northwest boundary is the "gateway" to the park and provides an important buffer against incompatible land use. In that respect, it should be included in the park boundary. The Forest Service presently administers the site but has a difficult time managing it because of its relationship to other Forest Service lands. Consequently the site is rapidly deteriorating due to heavy, unrestricted use including hunting and ORV activity.
- (2) **East Fork Creek:** This 2,800-acre addition, comprised mainly of Forest Service and state land on the western boundary of Bryce Canyon, would eliminate the present straight, section-line boundary and realign it along natural topographic features. The addition begins on the south following Podunk Creek and incorporates the remainder of Whitman Bench as it parallels the East Fork Creek.
- (3) **Horse Mountain:** These 21,000 acres, located on U.S. Forest Service and BLM land, are critical to maintaining the scenic vistas at Bryce Canyon. This adjustment will incorporate Horse Mountain and surrounding Bull Valley and Indian Hollow. These lands are the immediate background of the park's famed pinnacles from the Rainbow Point and Farview observation points. Any development or management changes on these lands could seriously affect the views from these major overlooks. Additionally, the land would provide hiking and camping opportunities not presently available in the park and preserve prime resource habitat for the endangered peregrine falcon, deer and mountain lion. In 1982 the Forest Service had identified their holdings here (6,000 acres) as excess to their needs and available for sale.
- (4) **Plateau Extension:** This 890-acre section is also a part of the Paunsaugunt Plateau and contains similar spires as are protected in Bryce Canyon National Park. The land is an isolated BLM Wilderness Study Area surrounded by the city of Tropic on the north, south, and east, and by the park on the west. The geologic resources are definitely of park quality and logically should be managed by the Park Service.

(5) **Paunsaugunt Plateau:** These 1,900 acres of mixed U.S. Forest Service and BLM land abutting the northeast corner of Bryce Canyon National Park form a natural extension of the Paunsaugunt Plateau of which Bryce Canyon National Park is a part. It is a roadless area and contains many of the unique erosional features found in the park itself. This addition would give this part of the park a more logical boundary by following a jeep trail running along the ridge near Cedar Fork on the north, and following natural vegetation and elevational features near the Cope Canyon and Backbone Ridge areas above the city of Tropic.

National Parks and Conservation Association
Boundary Study
February 1988



**BRYCE CANYON
NATIONAL PARK
UTAH**