

May 19, 2017

R. Paul Van Dam
173 Painted Hills Drive
Ivins, Utah 84738

Congressman Tom McClintock
U.S. House of Representatives
2312 Rayburn House Office Building
Washington, DC 20515

Re: H.R. 2423

Dear Congressman McClintock,

I am writing to you in regards to legislation H.R. 2423 by Congressman Chris Stewart. The House Federal Lands Subcommittee you chair will be hearing testimony at the May 23, 2017 hearing on this bill which proposes "To implement certain measures relating to management of Washington County, Utah, required by Public Law 111-11. *"Washington County, Utah, Public Lands Management Implementation Act."*

On January 22, 2016 I participated in a Congressional hearing held in St. George, Utah and spoke to members of this same committee to address public land issues in our county. As a life-long Utah resident and current resident of Washington County, Utah, former Utah Attorney General and an American, public lands are of great importance to me.

The main issue that brought the committee members to Southern Utah last year, as you know having been a participant, was a proposed Northern Corridor to move traffic through our county and the BLM's 2015 Resource Management Plan that addressed that road, although not to the liking of our local leaders. The road block "literally" is the Red Cliffs Desert NCA and tortoise reserve established in 1996 to protect the threatened tortoise population and other threatened and endangers species in our area while allowing development in over 300,000 acres of land.

My oral and written testimonies from last year are on record and my written testimony is included at the end of this 2017 letter. I would like to add some additional information that's come to light during this past year and some historical information that may help shed additional light on this matter.

At this time, the Habitat Conservation Plan is up for renewal. Established in 1996, the twenty-year plan was extended in 2016 with the understanding that the county would continue to work diligently on the renewal specifics with involved entities including USFWS, BLM, Utah's Department of Natural Resources and local entities. This process has been underway but the Northern Corridor is still a sticking point. At this time, the county has held meetings to review options for roads that would not bisect the reserve/NCA in addition to their preferred road that would bisect the reserve/NCA. It's important for subcommittee members to remember that

particularly in 2006, but even for many years before, including 1996, Washington County, Utah had been an extremely fast-growing area. Any of Utah's national, state and county leaders dealing with this information now are aware of that. Growth that they now say demands this road is not new and many were involved in 1996 when the HCP was finalized. These meeting minute excerpts from 2006 reveal how the road discussion has played out.

From the February 28, 2006 Habitat Conservation Advisory Committee (HCAC) meeting minutes at which a "Northern Beltway" alignment was discussed:

Concerns were expressed by several Committee members. **Henry Maddux (Utah Department of Natural Resources) reminded that when the HCP was negotiated, a northern beltway was discussed by ultimately excluded.** He explained that the reserve is very small in terms of tortoise recovery and is always under scrutiny by those who have questioned whether such a small recovery unit would be successful. **Bisecting the reserve with a beltway would be a major impact and would threaten the viability of the HCP.** Mr. Maddux questioned whether the HCP could withstand another public process and FWS review and recapture the mitigation the reserve provides for the development of over 300,000 acres. He expressed that the widening of Turtle Road and Skyline Dr. was approved and supported. However, he would have a difficult time supporting a beltway bisecting the reserve.

Jim Crisp (BLM) reiterated that the HCP allowed for the widening and realignment of Turtle Road (Red Hills Parkway). However, **HCP negotiators determined that a northern beltway could not be accommodated and still provide a viable reserve.** He expressed that a northern beltway bisecting the reserve could not be allowed from a legal and a biological stand point. The reserve was developed so that portions of Washington County could be developed. The permit issued by USFWS does not allow for take in the reserve. **Mr. Crisp mentioned that if the beltway were approved, a future connection via Cottonwood Road might become a secondary concern by creating an additional paved road inside the reserve.** He stated that a beltway bisecting the reserve would be legally and biologically difficult to defend and might ultimately result in the failure of the Land Bill. **He offered that an alternative might be to create a beltway along the Danish Ranch Road and the Forest Service boundary.** Such would provide a way for people on the west and north ends of the county to avoid the St. George City complex when accessing I-15 northbound. However, it would not serve as a route for workers or shoppers.

Henry Maddux suggested that the planners consider a roadway further north to accommodate the northward expansion of the County.

During discussion it was noted that the HCAC would be willing to look at other alternatives and work with the various planners to create an appropriate route. **Reed Harris (USFWS) pointed out that the Motion on the table would not preclude a route around the perimeter of the reserve but recommends a route other than one bisecting the heart of the reserve.** There was no further discussion, vote was taken and the **Motion was unanimously passed.**

From the March 28, 2006 HCAC meeting minutes where “Proposed Highway through Reserve from Washington City through Broken Mesa, to Winchester Hills per the Washington County Land Bill” was discussed. Commissioner Gardner and St. George City Mayor McArthur came to the HCAC to readdress the road issue in light of the 2006 Washington County Growth & Conservation Act being run in Congress by Senator Robert Bennett and Congressman Jim Matheson, and expressed their desire to have a road clearly shown on the legislation’s map:

Henry Maddux expressed appreciation to Mayor McArthur for his support of endangered species issues. He recognized the need for transportation from the west side of the County to the east and expressed that a planning process, as previously described, would be the ideal way to determine the designation of such a transportation route. However, **he expressed concerns about including an actual line on the map before a final route is designated even if language in the Bill indicates that final route designation will be determined through a planning process.** He opined that when a line is drawn on a map, it has a tendency to take on a life of its own and can be later perceived as the preferred route or the starting point for negotiations. Mr. Maddux stated that he would be agreeable to language in the legislation recognizing the need for a northern corridor if the corridor were not depicted on the map and not predetermined to go through the reserve.

Mayor McArthur expressed that because of past experience, City officials believe a line on the map is necessary to ensure the provision for a northern corridor. Otherwise, the language or intent may be misinterpreted by future planners and may ultimately disallow a northern corridor.

Reed Harris explained the reason a northern corridor was eliminated when the original reserve boundaries were drawn. He explained that the originators of the HCP were criticized by tortoise experts in California, Nevada, and Arizona because the recovery area proposed by the HCP was too small. However, because of the large number of tortoises, the health of the population, and **the fact that the area would not be bisected by roads,** critics were convinced that the reserve could be a viable recovery area. **Mr. Harris shared Mr. Maddux's concerns that a line on the map would leave the impression on future planners that the line is the only route considered or is the preferred route.**

After much discussion on the matter:

It was noted that the assurance provided by the Motion is to be in the form of a map annotation or Bill language, and **not a line on the map.** St. George City officials stated that the Motion would satisfy the City's needs. There was no further discussion, vote was taken and the **Motion was unanimously passed.**

I think these meeting minutes reveal that there has never been any firm decision on the road and what the route would be and in fact show that a road through the reserve was rejected even back then.

While the county and other involved entities are busy considering options for a road to meet Washington County’s transportation needs, they are also looking at the idea of “satellite” areas

for habitat that they feel would be used to help “mitigate” the acres used for their preferred road through the heart of the reserve/NCA. It’s always been in question, “How do you mitigate mitigation – since the reserve is the ‘mitigation’ for allowing development in Washington County?” This, then, is their “creative” way of helping to achieve that. But, it’s documented in the HCP and elsewhere that fragmenting habitat does not help the at-risk population. Some see potential benefits of helping with “genetic diversity” but that has yet to be identified as a sure thing. If this is being used by proponents with whom you are speaking on this matter, I feel they should be encouraged to take a wait and see attitude about the success of satellite areas before embarking on what could be a very flawed plan.

I know as a member of this Congress you are a very busy individual, so I will not take any more of your time and you may read my testimony from the January 2016 St. George, Utah Congressional hearing (following this letter) if you need more on this topic. Perhaps this official statement by Senator Bob Bennett pertaining to the 2008 Washington County Growth & Conservation Act (now part of OPLMA) will carry more weight from the U.S. Senate hearing record of April 22, 2008 on S.2834:

“Congressman Matheson and I have made significant changes to the previous proposal. We have permanently protected large amounts of biologically significant public land in Washington County, including additional wilderness and a new national conservation area. We have removed the corridor designations for the Lake Powell Pipeline Corridor and the Northern Corridor that bisected the Red Cliffs Desert Reserve” p.8 (emphasis added)

It seems clear to me and I hope to you and others on the Federal Lands Subcommittee, also, that this bill by Congressman Stewart is getting ahead of what’s actually being done in his own county. The county is supposed to be working diligently to renew the HCP as part of the renewal process. If they are supporting this effort by the congressman what does that say about that diligence?

Congressman Stewart’s H.R.2423 bill attempts to secure rights-of-way for a northern transportation route identified on a map entitled “Proposed Northern Transportation Route Alignment” and utility corridors. As is indicated in the 2006 and 2009 meeting minutes provided here and the recent May 2, 2017 Washington County Commission Northern Corridor meeting along with many HCP renewal meetings in 2016 and 2017, **no route has been determined**. To have this backdoor legislative approach occurring at the same time as ongoing meetings where route discussions are occurring undercuts the entire process.

Sincerely,

R. Paul Van Dam

Attachment: January 22, 2016 Congressional Testimony, Subcommittee on Federal Lands

Congressional Testimony
R. Paul Van Dam
Subcommittee on Federal Lands
United States House of Representatives
January 22, 2016
St. George, Utah

As a life-long Utah resident, property owner in and current resident of Washington County, Utah, former Utah Attorney General and an American, public lands are of great importance to me. I appreciate being able to provide testimony at this public hearing convened by the House Natural Resource Committee's Subcommittee on Federal Lands and be given time to speak on behalf of those in our county and others who support our public lands and value their preservation now and into the future for generations to come.

Given my legal career and having served as executive director for Washington County's only local grassroots conservation organization, Conserve Southwest Utah, I am familiar with laws dealing with our county's public land. I was heavily involved in the 2006 Washington County Growth and Conservation Bills offered by Utah's Senator Robert Bennett and Congressman Jim Matheson. When I became CDF's executive director in 2008, the effort by Senator Bennett and Congressman Matheson had been met with vigorous opposition by local citizens, resulting in the formation of CDF and ultimately the initiation of the Vision Dixie process by Washington County Commissioners to deal with the unrest created by the legislation. To their surprise, the Vision Dixie process revealed great support in this county for our public lands and reluctance to spin off large portions to Washington County or build a Northern Corridor through the Red Cliffs Desert Reserve, now part of which is an NCA.

The 2006 bill version was soundly rejected and resulted in a revised version being included in the 2009 Omnibus Land Act. In 2008 I was directly involved in conversations with Congressman Matheson's office leading up to the final version for the 2009 legislation. They were unwilling to completely relinquish the idea of their preferred Northern Corridor but language was revised in the 2009 legislation to provide leeway in that regard. We now are dealing with the results of that and arguing whether the BLM has lived up to the letter of the law described in the 2009 Omnibus Public Land Management Act (OPLMA), Subtitle O. I believe they have.

Much of the disagreement pertaining to this contentious road deals with what has been on the county and city transportation plans for decades according to county leaders. That may be the case, but according to my conversation with Dr. William Mader who served as the first administrator of the Red Cliffs Desert Reserve (Reserve), established in 1996, and administered the Habitat Conservation Plan (HCP), there was no plan for a road, and it was clear to county and city officials involved in the process and BLM, US Fish and Wildlife Service and Utah's Division of Wildlife Resources that was the case. Straightening of Skyline Drive (also known as City Creek by some) was discussed to deal with traffic, but certainly no road through the heart of the Reserve. There was some early discussion but it was made clear that if they wanted the HCP that would allow development to ensue in over 300,000 acres of Washington County, there would be no road. Dr. Mader was part of all official discussions, meetings and decisions

in this regard. If side conversations occurred implying something different, they were not part of the official decision-making process or record.

When Dr. Mader and I spoke, I asked him about the Washington Parkway Study done in 2012 in which a biologist working with Utah's Department of Transportation and the Dixie Metropolitan Planning Organization, our local transportation planning organization, was contracted to review the proposed Northern Corridor preferred route, also called the Washington Parkway, and show how, if at all, a road could be constructed to help the tortoise population. Dr. Mader, being a trained biologist himself and former head of the Reserve, stated unequivocally that the road would not help the situation. The tunnels suggested by UDOT/DixieMPO's biologist would not provide the necessary access needed. The additional traffic, along with the noise and pollution that would result, would not be conducive to helping the tortoise population which has declined by around 50% since 2005's summer fire season.

To substantiate Dr. Mader's concerns, I offer the following from a December 19, 2012 letter from the Desert Tortoise Council pertaining to the Washington Parkway Study (Study) conducted by UDOT and DixieMPO:

"But for" this project, none of the threats listed in the table in the executive summary (pages iii and iv of the Study) would affect the Reserve. Therefore, the best way to eliminate the following threats is to prohibit the construction of a new highway through the Reserve: Direct mortality, construction activities, habitat fragmentation, habitat loss, small reserve/population size, disturbance, spread of exotic and invasive plants, increased risk of fire, increased predation, disease, increased access to remote areas, and cumulative threats. In Section 7.9 on page 51, the Study fails to indicate that a new roadway through the Reserve would be a new source of road-killed animals that would serve to subsidize ravens and coyotes.

The Council takes exception to the following statement: "This study illustrates that a comprehensive approach to roadway design and associated management can ameliorate many existing threats, contribute to improving conditions, and provide future management options for the tortoise on the Reserve." First of all, there are no "improving conditions" in a population that has declined by almost half since the HCP was implemented and the Reserve established. It is extremely misleading to claim that the project itself, which is probably inmitigable, will somehow benefit tortoise conservation elsewhere; such statements redirect the readers' attention away from the impacts associated with the proposed project by promising conservation elsewhere. Since this conservation is already guaranteed by an HCP with its adaptive management contingency plans, there is no need for the "additional" conservation proposed by this new project.

Dr. Mader's concerns and those of the Desert Tortoise Council are not the only reasons for rejecting the Northern Corridor route preferred by our county and city leaders. The county's own 2015 Regional Transportation Plan clearly states that roads will not solve this county's traffic problems. The report also points out that the majority of this county's growth will be in the southern and southeastern areas of this county meaning that a Northern Corridor would support a very small population of this county at an expense of around \$100 million. The transportation plan also shows that we have a deficiency in funding for others roads that are more essential to more populated areas and shows that the road would save a mere 1.7 minutes from travel time.

As a resident of Ivins, a town in the northwestern part of Washington County, conceivably I could benefit from a Northern Corridor, but to have 1.7 minutes shaved from my travel time while turning our backs on an obligation made in good faith in the 90s and challenging to the Red Cliffs Desert Reserve and Red Cliffs NCA, an area that citizens and visitors have come to love and cherish, makes no sense to me.

The argument is made that traffic on St. George Boulevard and Red Hills Parkway will not be able to handle the coming traffic, but then the transportation report shows that congestion will not be eliminated on these roads even with a Northern Corridor. And, amazingly, the preferred Northern Corridor (aka Washington Parkway) is designed to move traffic onto Red Hills Parkway near the Highway 18 intersection, which seems to completely undermine the purpose for a road. In fact, even now, if I desire to avoid St. George Boulevard and other mid-town traffic, I can take I-15 to Dixie Drive and Dixie Drive to Snow Canyon Parkway and home.

While local leaders attest to the need for a road to move traffic, a 2007 UDOT study concerning a proposed Northern Corridor dealt with the county's preferred route (Red Hills Parkway to I-15 at MP 13 in a chapter titled: "Alternatives Considered but Eliminated from Further Consideration." Here are excerpts from that report:

Under this alternative, traffic conditions would also slightly improve on St. George Boulevard but would slightly deteriorate on Bluff Street.

However, traffic demand along St. George Boulevard would still exceed the road's capacity, so the effect may be minimal.

The Northern Corridor Alternative would not meet the objective of minimizing impacts to the reserve.

According to a letter from USFWS, "such a road would compromise the commitments on which the Washington County Habitat Conservation Plan was based, is likely to compromise the biological integrity of the Upper Virgin Recovery Unit (already the smallest recovery unit), and may result in an adverse modification of designated critical habitat."

While others may not take heed to what Dr. Mader and biologists from the Desert Tortoise Council say about the effects of the proposed, preferred Northern Corridor route, or consider the admonitions provided in transportation studies, perhaps this official statement by Senator Bob Bennett will carry more weight from the U.S. Senate hearing record of April 22, 2008 on S.2834:

"Congressman Matheson and I have made significant changes to the previous proposal. We have permanently protected large amounts of biologically significant public land in Washington County, including additional wilderness and a new national conservation area. We have removed the corridor designations for the Lake Powell Pipeline Corridor and the Northern Corridor that bisected the Red Cliffs Desert Reserve" p.8 (emphasis added)

What's needed is for our transportation planners to go back to the drawing board and devise ways to deal with our projected traffic needs without undermining agreements that were made

at an earlier time. County-wide coordination of all general plan updates and major rezoning approvals would improve transportation planning. All signatories to the HCP need to uphold the agreement and do their general plan updates and transportation planning with the Northern Corridor off the table.

Although the proposed Northern Corridor (aka Washington Parkway) is a major sticking point in the BLM's 2015 RMP, other issues are pertinent to this discussion and bear mentioning. Of critical concern by our leaders at all government levels is their contention that the BLM has failed to live up to the actions designated in the 2009 OPLMA. Given my reading of the OPLMA language and my legal career, I disagree. The following is the direction given to the BLM – representatives for the Secretary of Interior – by the OPLMA:

(2) USES.—The Secretary shall only allow uses of the National Conservation Area that the Secretary determines would further a purpose described in subsection (a), which provides:

(a) PURPOSES.—The purposes of this section are—

(1) to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of the National Conservation Area; and

(2) to protect each species that is—

(A) located in the National Conservation Area; and

(B) listed as a threatened or endangered species on the list of threatened species or the list of endangered species published under section 4(c)(1) of the Endangered Species Act of 1973 (16 U.S.C. 1533(c)(1)).

Pertaining to the Northern Corridor issue the 2009 bill states:

(A) in consultation with appropriate Federal agencies, State, tribal, and local governmental entities (including the County and St. George City, Utah), and the public, identify 1 or more alternatives for a northern transportation route in the County.

The BLM has identified four options for a road in their Alternative D of the RMP. What they have not done is support Alternative D as their preferred alternative because it conflicts with the directive of protecting the species within the NCA. OPLMA does not direct them to “prefer” an alternative; it only directs that they “identify” alternatives.

For leaders such as Utah's Senator Orrin Hatch to assert that the BLM has gone against the “intent” of OPLMA is without merit given what Senator Bob Bennett's 2008 official comments show. If we are to legislate by back room deals and not by what is in official testimony and in legislation itself, we will surely be arguing over this forever.

Given the requirements of the HCP to protect the Red Cliffs Desert Reserve's flora and fauna while they've had pressure for a road that would go against that has placed them in a very difficult position. Also, the requirements of FLPMA have presented challenges, and yet, these are laws and agreements that have been enacted and agreed to by previous congressional

actions and local leaders. Are we to completely upend the apple cart and challenge all decisions made by those who came before us?

Local leaders, county and city, assert they have not been included in the decision making process leading up to the RMP and yet they have known, or should have known, since 2009 that this plan was in progress. They have had every opportunity to be involved, and in fact, I believe they have been involved but simply have not achieved what they want; hence this hearing has been convened to help force their issues.

Washington County leaders have complained that the RMP was too extensive for proper review. However, the BLM initiated their planning process by publicizing a Notice of Intent in 2010, which began a 60-day scoping period for the public to assist BLM, and that included local officials, too. Meeting dates, times and locations for four public meetings were announced and details for public comments provided. The information was also published in newspapers in the planning area at the same time. This gave the public, which includes local leaders, time to participate and communicate their needs to the BLM. If local leaders feel they should have been paid deference and been given special attention, that is not borne out in the OPLMA.

The RMP was issued for the initial 90-day comment period in July 2015, and the BLM held open house meetings to answer citizens' questions. Additionally, the regional BLM office is always open to receive citizens and interested persons, including the mayors if they are truly interested in getting information and having a two-way conversation.

Had local leaders truly wanted to be involved in the RMP planning process, they had plenty of opportunity. They had access to OPLMA details and what issues the BLM would address. Had officials been concerned, they could have begun reviewing those needs and identified areas that would be particularly problematic for their citizens and started developing preferred plans to communicate to the BLM.

Additionally, city and county leaders have monthly access to federal agency representative through the Habitat Conservation Advisory Committee (HCAC) that oversees the Reserve/NCA. Two mayors sit on the committee, St. George city manager is on the committee, which also includes representatives from the BLM, USFWS and Utah's Division of Wildlife Resources, and Washington County Commissioner Alan Gardner attends monthly meetings which are preceded by lunch for committee members and any citizens who might want to participate. There are also ad hoc work meetings and field trips during which leaders and federal/state agency representative interact.

So, where does the public stand in this process? How do they feel about our public lands and the efforts underway to wrest control from the federal government and place under state control where leaders such as those who are challenging the BLM's RMP can have their way? A nationwide poll done by the CREDO wireless network challenging Senator Hatch's S.1783 that would force the preferred Northern Corridor through Red Cliffs NCA has garnered over 126,000 signatures by those across America who challenge the idea of politicians making decisions that should be left to those with more biological background. Even informal local online polls have

shown that 64% of participating Washington County residents oppose the idea of this controversial road.

On a more general level regarding America's public lands, a recent poll by the Colorado College State of the Rockies Project "Conservation in the West Poll" showed support for keeping America's public land under federal control rather than relinquishing to the states. The college's website states:

Despite an uptick in anti-public lands rhetoric from militant extremists, Colorado College's recently released State of the Rockies Project Conservation in the West Poll shows strong public support for efforts to protect and maintain national public lands.

https://www.coloradocollege.edu/newsevents/newsroom/2016-conservation-poll-finds-support-for-public-lands#Vp_OtZorLGg

From the college's January 2016 press release about the poll, key findings from the poll include:

- Ahead of the 2016 elections, 75 percent of respondents say issues involving public lands, waters, and wildlife are an important factor in deciding whether to support an elected public official, compared to other issues like health care and education.
- 83 percent of respondents believe the drought is a serious issue and in Colorado River Basin states (CO, NV, NM & UT) strong majorities favor using the current water supply more wisely over diverting more water from rivers in less populated areas.
- 75 percent of respondents support the renewal of the Land and Water Conservation Fund.
- 80 percent of respondents believe the U.S. Forest Service should be allowed to treat the largest and most expensive wildfires as natural disasters in order to have access to emergency disaster funding.
- 72 percent of respondents say national public lands, such as national forests, national monuments, or wildlife refuges help their state economy

Many of our local county and city leaders assert that growth will be hampered by BLM's RMP decisions. Few details have been presented to uphold this assertion. The BLM's St. George Field Office and the county, through the Habitat Conservation Advisory Committee (HCAC), have been managing these lands for many years. The HCP administered by the HCAC is currently up for renewal after its twenty-year life. Washington County was considered the fastest growing county in the nation leading up to the Great Recession in spite of these public lands. In fact, these public lands draw visitors from around the world to enjoy this area and provide recreational opportunities to residents. To assert that decisions by the BLM regarding introduction of the California Condor, restrictions on some grazing and OHV opportunities, along with the myriad other concerns will challenge this area's growth seems foolish.

Although some citizens and leaders believe they know a great deal about public lands, the BLM and forest service inspect them, evaluate them, report on them and are in a position to have a fully developed factual base for their opinions. These activities are accomplished by trained, qualified personnel. Much of my testimony has concentrated on the Red Cliffs NCA and the proposed road through the Reserve and NCA because of the challenges that area faces. Tortoise population presence and decline is well documented. As noted in the RMP, the animals have been studied since the 1930 as confirmed by the RMP's reference on page 399 pertaining to the Beaver Dam Wash NCA:

Woodbury and Hardy (1948, 187) described their study area between 1930 and 1935 as consisting of 1,200 acres that represented the “home area of a semi-isolated colony of approximately 300 tortoises”. From these data, they concluded there were 2,000 or more tortoises in the estimated 70 square mile area of the Slope, and described the area as being potentially good habitat but for the impacts to the native vegetation communities as a direct result of overgrazing by sheep and other livestock.

So, populations in the Red Cliffs NCA, Reserve and Beaver Dam Wash NCA are and have been at risk for some time. Social trails through the Red Cliffs NCA have increased as our population has increased. Providing additional access via a road will not help this situation. So far the Mojave desert tortoise’s listing has not been elevated from threatened to endangered. However, with the decline in population any other efforts to undermine those numbers could be seen as reason to elevate that listing, there providing additional demands on management, which I’m sure our local leaders would not want.

There is much more that can be addressed given the extensive nature of the BLM’s RMP and the many obligations they have regarding management. I’ve hit on what I consider the high points that have resulted in this hearing being called. I appreciate having the opportunity to participate and share my thoughts and information on this important topic not only to our area but nationally, as well.