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Low-Carb Planning: Challenges in Streamlining the National Park Service's Approach to General Management Planning

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Thomas Vint, chief landscape architect of the National Park Service (NPS), wrote in the 1946 *Quarterly Planning and Civic Comment* that “to plan the development of a national park or national monument requires no specific magic.” That cheerful statement was penned before there was a National Environmental Policy Act (NEPA), Wilderness Act, Wild and Scenic Rivers Act, National Historic Preservation Act, Clean Air Act, Clean Water Act, Endangered Species Act, Government Performance and Results Act, Coastal Zone Management Act, Native American Religious Freedom Act, Federal Advisory Committee Act, Freedom of Information Act, Telecommunications Policy Act, Director’s Order #75A on Civic Engagement, and a host of other challenging and potentially conflicting laws, regulations, executive orders, policies, and procedures.

Vint did, however, anticipate the need for good information about resources, visitor carrying capacity, and money:

It is like any other job of planning the use of land for human enjoyment. It is necessary to know the land involved thoroughly, to know how people are to use it and about how many will use it at one time. That information should state the problem, however it is too frequently incomplete. Next it is necessary to work out a design that is satisfactory to those in authority. Then to make it a reality all that is needed is to finance and to build.

In 1978, Congress adopted a law that directs the secretary of the interior to develop and update on a timely basis general management plans (GMPs) for each unit of the national park system. Those plans are required to do pretty much what any “master” plan should do: describe how resources will be protected, determine what facilities are needed, identify carrying capacity, and discuss any potential changes in the park boundary that might be necessary. If Congress had not passed that law, it seems that every park manager would need to know answers to those questions. Although a lot has changed since 1946, making plans that are satisfactory to those in authority and finding money to finance the work that needs to be done continue to be challenges.

Vint’s idea that park planning requires no special magic returned to the stage in 1994 when the planning program managers undertook a “future search” to address slow progress in getting plans completed for the (now 388) parks, and the perception by many superintendents and regional directors that plans took too long and cost too much.

This effort enlisted representatives of parks, regional, planning teams, NPS programs, and other agencies to develop a vision about the purposes of planning and its value to management, and to define a vision for the future that could be implemented. The result of this

initiative was a series of actions adopted by the program managers designed to eliminate the organizational barriers to flexibility, creativity, and cooperation in the planning process.

Parallel with the planning program's internal efforts to improve its processes, the National Park Service was engaged in a variety of reinvention, reorganization, and realignment efforts. Most important to the planning process were re-engineering initiatives in the Denver Service Center that confirmed the suspicion that a great deal of site-specific or project planning work in GMPs was never implemented. Efforts continued through the 1990s to find the "ingredients" in the planning soup that might be responsible for excess fat. The hope was somewhat like that promised by the Adkins and South Beach diets: by cutting out the "carbs" we could have all the planning services we needed and still have a lean, healthy program that met the needs of park managers.

In 1998, Director's Order #2 was adopted to further the work initiated four years earlier. This policy statement reaffirmed some of the ideas expressed by Vint in 1946: "[T]he plan is based upon an understanding of the significance and purpose of the reservation.... Planning is a continuous process.... [C]onsultation with authorities outside the Service is sought.... [A]ll indications are that people will come in greater numbers than before and facilities to accommodate them are inadequate...."

Director's Order #2 made some revisions in the planning framework to avoid duplication and inconsistency. The requirement for a "statement for management" described in previous planning guidelines was dropped, as was the "outline of planning requirements." Both of these documents were considered at the time to be redundant with the anticipated role and function of the park strategic plan and annual work plans. But the most important step toward reducing the "carbs" in the general management planning process was to focus on establishing broad visions and desired conditions for park resources rather than get bogged down in details of development projects and other actions that might not be imminent. Director's Order #2 expired in 2001 and effectively migrated to Chapter 2 of the NPS Management Policies that were adopted in that year.

As background information for the update to the NPS planning framework, the park planning division in the Washington Office initiated a review of projects in the past decade to determine the major factors that contributed to time and cost. The review of a representative sample of projects led by the Denver Service Center found they ranged from \$109,000 to \$768,000, with an average cost of \$309,000 and an average duration of 52 months.

Estimates of the cost to complete GMPs for the parks on the servicewide priority list for 2002–2007 range from \$160,000 for a relatively small-scale amendment to \$2.1 million for a GMP in Yellowstone National Park. Notwithstanding a variety of efforts to find ways to streamline planning, the average cost of GMPs completed in 2004 was \$520,000. Inflation might account for a substantial portion of the 40% increase in average plan costs since 1994, but the perception that plans cost too much and take too long persists.

A 1994 analysis of GMP cost and duration confirmed suspicions that the major contributors were compliance documentation, complexity of issues, and changes in project direction. The review process and changes in direction were also highlighted as not always being perceived to be worth the time and cost they involved. However, the sample of superintendents, planning team leaders, and regional office coordinators (60 total interviews) agreed that

some of the most important results of the plan were clear definition of management objectives, improved public understanding of park purpose and values, as well as guidance for facility development.

During the 2005 George Wright Society conference, a panel of people with extensive and diverse experiences with the GMP process was invited to reflect on some lessons learned from their own efforts to complete plans that met park needs. The panel members included: Linda Canzanelli, superintendent of Biscayne National Park, Florida; Bob McIntosh, associate regional director for planning and partnerships, Northeast Region; Debbie Darden, deputy superintendent, New River Gorge National River, West Virginia; Jan Harris, planning branch chief, Denver Service Center; David Graber, science advisor, Sequoia-Kings Canyon National Parks in California; and Dennis Schramm, program analyst, Washington Office. These panel members brought experiences from dozens of other parks where they had worked or been part of a planning team.

In response to the question of why parks undertake GMPs, the discussion highlighted the “political” forces that frequently are at work. Secretary of the Interior Bruce Babbitt’s interest in coral reefs was a driving force behind initiation of the new plan for Biscayne. At Sequoia-Kings Canyon, questions about the future of private cabins under permits inherited from the Forest Service were directed to a GMP process through agreements between National Park Service leadership and the local congressman. In the Northeast Region, many newly authorized parks are lacking any document to guide management and need to engage the public in charting their future.

Other parks cited the need to look at issues holistically and engage the public as drivers for the GMP. Getting the public interested, and sustaining their engagement in what appears to be a lengthy bureaucratic process, were identified as major challenges. Although the GMP provides a framework for engaging the public, perhaps superintendents who are inclined to reach out to the public already do so and they don’t need any new processes or directives to encourage them.

Civic engagement, especially as practiced in the Northeast Region, has been very effective in revealing stories about parks that need to be told but are often overlooked. This requires a much more focused effort than just inviting the general public to comment. The approach for New River Gorge needs to be tailored to the residents of the area, many of whom have a view of the park that is based on their experience in dealing with railroads and coal and timber companies that formerly managed the area.

The situation at Sequoia raises another set of questions about who is being engaged and the limits of efforts to reach negotiated agreements among “stakeholders.” In that case, efforts to reconcile competing interests of hikers and horse or other pack stock users may have found a solution that is good for those groups but not necessarily for the rest of the public.

Work on the Rosie the Riveter World War II Homefront National Historical Park in Richmond, California, has yielded more than 10,000 calls from former “Rosies” who worked in factories to support the war effort. This type of response is exceptionally valuable, but it highlights the possibility that a really successful campaign to engage the public will quickly exhaust the ability of park staffs and planning teams to manage all the useful information.

Good data and science are widely recognized as essential prerequisites for park planning. The Northeast Region has made exceptional efforts to make sure that basic resource data collection and analysis are coordinated with schedules for anticipated GMPs. However, even for parks such as Sequoia with a long history of research, it appears that the data needed about the resources and the visitors often do not become evident until the planning process is well underway. The experience at Biscayne in addressing fisheries management issues provides another example of the challenges in using science for management decisions, as competing sides of the issue bring forth contradictory data and experts. Park planning is often an exercise in reconciling competing values rather than a quest for the scientifically “correct” answer.

Few recent discussions about the cost and time to complete GMPs avoid focusing on the compliance process. National Park Service planning policy since 1998 has sought to develop management prescriptions that define desired conditions (what) without getting into all of the details (how) of those conditions will be achieved. The hope is that by staying general, the plans can have a useful life of 15–20 years and be effective in addressing changes in technology, patterns of visitor use, and resource characteristics that we cannot reliably predict. However, National Park Service environmental planning policies and guidelines (Director’s Order #12) direct that GMPs will be accompanied by an environmental impact statement (EIS). Although there are procedures for seeking a waiver, the compliance processes for NEPA and the National Historic Preservation Act are often cited as reasons why the ideally broad, general plans are pushed into very detailed, specific analysis of environmental consequences. Recent emphasis on considering life-cycle costs are another source of pressure for more detail in general management plans.

Some observers suggest that the Forest Service’s proposed new (2005) planning rules that would categorically exclude forest plans from NEPA is the right approach. Others wonder if doing environmental assessments on some park GMPs is a better path. Generally, much of the bulk of EISs today responds to the legacy of past lawsuits, and legal guidance suggests that we are better prepared to fend off challenges by doing EISs. Further evaluations might be useful to see if relatively detailed analyses are needed for broad goal-setting plans, and if the environmental analyses accompanying GMPs are really being used to help make better-informed decisions. Could our EISs be improved by being less lengthy, and can we do as the NEPA regulations suggest and prepare analytic, not encyclopedic, documents? This may be one arena where some of the “carbs” could be reduced while producing lean, healthy plans.

Reflecting on her experience with a GMP for Gettysburg, Debbie Darden has described parts of the process as the “most difficult, frustrating, and thoroughly rewarding” in the experience of the park staff as well as the planners. Ultimately, while many superintendents grumble about the cost, duration, and staff time needed for a GMP, evaluations of completed projects most often conclude that the process was worth the time and effort.

The cost of preparing GMPs for national parks is relatively modest when compared with the cost of preparing management plans for national forests and resource management plans for the Bureau of Land Management, (which has a planning budget about seven times greater than that of the National Park Service). When plans are in progress, park managers

and the public often feel that they will never end. But planning for future generations inevitably involves addressing extremely complex and controversial questions of competing ideas and values. The ideal result of our planning processes is engagement of the park staff and all the stakeholders, or communities of place and of interest, and agreement on the conditions that we should be seeking to sustain.

In Thomas Vint's era, planning for parks involved looking inward to make informed decisions about physical infrastructure. Park planning for the future requires looking beyond park boundaries, linking to a national system of protected areas, and nurturing partnerships that help sustain park values. The cost and time to complete a plan can be inconsequential in relation to the costs for restoring an ecosystem, rehabilitating a historic structure, or maintaining and staffing a facility throughout its life cycle. If planning is considered part of management rather than another task to be done, it might just become a relatively inexpensive and effective way to achieve a healthy, sustainable future.