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Panel: Perspectives on External Threats to the National Parks [Report of the Subgroup of the Park Protection Working Group]

Stephen A. Gleason

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PANEL:

PERSPECTIVES ON EXTERNAL THREATS TO THE NATIONAL PARKS

Stephen A. Gleason
Deputy to the Under Secretary
Department of the Interior

External Development Affecting the National Parks:
Preserving "The Best Idea We Ever Had"
September 14-16, 1986
Estes Park, Colorado

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REPORT OF THE SUBGROUP
OF THE
PARK PROTECTION WORKING GROUP

Submitted to:

The Under Secretary
of the
Department of the Interior

June 12, 1985

INTRODUCTION

At the April 24, 1985 meeting of the Working Group the Under Secretary asked that a subgroup be convened to discuss in detail the ideas and suggestions presented at that meeting. The subgroup, consisting of representatives of the National Park Service, the Bureau of Land Management, the Fish and Wildlife Service, the U.S. Forest Service, and the Interior Department Office of Policy Analysis, met several times to review the land use planning policies and procedures of the various agencies, to review the case studies discussed by the Working Group, and to discuss how to improve the operation and management of the various agencies to better address resource conflict problems among them.

The subgroup developed a draft report that was circulated to the full Working Group for their comments. This final report reflects those comments.

Summary Findings/Recommendations:

In summary, the subgroup reached the following conclusions:

- o Concur with the two major themes that were discussed on April 24:
 - the program should be accomplished without establishing new planning, reporting, monitoring, or other systems;
 - conflicts should be avoided when possible and be more effectively resolved if they cannot be avoided.
- o The issue of "Park Protection" should be addressed by having all agencies look at:
 - how to anticipate conflicts;
 - how to avoid conflicts;
 - how to resolve conflicts.
- o Addressing anticipation, avoidance, and resolution requires both:
 - various ad hoc changes in, and enhancements of, existing agency procedures;
 - increased emphasis (1) on the importance of land managers taking a broad view in their interests

and in the scope of their activities and (2) on evaluating the performance of managers and organizational units on that basis.

- o Implementation of the program should be accomplished by:
 - an announcement by the Secretary/Under Secretary of the program goals and findings;
 - a directive that Assistant Secretaries and bureau directors develop programs to implement those goals and findings;
 - primary responsibility for implementation should lie with the bureau directors, with the Under Secretary retaining an oversight role;
 - monitoring of implementation by (1) periodic review of implementation schedules, and (2) incorporating the changes into existing operations evaluations systems;
 - requesting the Secretary of Agriculture to take similar steps within the Forest Service.

DETAILED FINDINGS AND RECOMMENDATIONS

The subgroup began by addressing itself primarily to the issue of how formal planning processes could be used to avoid future resource conflicts, primarily between units of the National Park System and their neighbors. This approach assumed that the best approach was to avoid conflicts whenever possible through better planning. We initially took as our secondary task the analysis of how to better resolve conflicts if they could not be avoided through planning. However, since the types of resource conflicts affecting national parks are so broad (ranging from wide scale air quality problems to small scale "Saguaro-type" problems) and since the distinctions between planning and implementation are so variable, we began to think in terms of anticipation, avoidance, and resolution of conflicts, regardless of whether through formal planning or through better day-to-day operations.

Conflict Anticipation: Anticipation of conflicts between land managing agencies is crucial for successful avoidance of the conflicts and for preparation for efficient resolution of the conflict at the appropriate time. Anticipation of conflicts can occur through formal planning processes, through informal working relationships established among land managers, and by greater attention by land managers to activities around them.

Conflict Avoidance: Avoiding conflicts is successful when lead time is sufficient to prepare alternatives and to collect data, and before institutions (people and organizations) become inflexible and locked into positions. Formal planning processes are particularly useful when they include specific requirements and procedures for inter-agency coordination and consultation as well as requirements for identifying alternatives and analyzing the various effects of the alternatives. However, continuing attention by land managers to activities around them, and continuing communication among land managers, is vital.

Conflict Resolution: Early anticipation and good faith efforts to avoid conflicts cannot solve all resource conflict problems. Differences in statutory mandates and resources management philosophies, as well as the impossibility of complete coordination and communication on all issues, necessarily mean that conflicts will arise and that resolution of some sort is required. Effective and efficient conflict resolution occurs when decisions are made at the lowest level practicable, when those decisions are made on the best available information, and when each party feels the decision process is fair and honest.

Findings

1. Anticipation, avoidance, and resolution of resource conflicts is best accomplished by:
 - using existing systems for planning, operations, and evaluation; changes in those systems should be made where necessary to improve the ability of the systems to deal with resource conflict problems and in a manner the recognizes the mission of the agency and purposes of the systems;
 - placing increased emphasis on the personal roles played by land managers, their staffs, and other agency staffs; agency employees should be held accountable for efforts to successfully handle resource conflict problems.
2. Planning Processes: The land management planning processes of each agency are designed to meet unique statutory and policy requirements. Though similar in many ways, each has differences. The processes are generally successful in meeting the internal needs of the agencies; they are less successful to the extent that inter-agency coordination and planning aspects are addressed in dissimilar ways. Specific recommendations for improving certain aspects of the planning processes, but which do not violate the integrity of the processes, are proposed.
3. Implementation: Successful implementation of resource conflict anticipation, avoidance, and resolution requires a bottom-up approach. The goals and expectations of the program should be forcefully articulated by senior policy officials, but responsibility for designing specific approaches and for implementing them must come from agency managers. Oversight and monitoring should be institutionalized within each agency.

Recommendations for Improving Anticipation, Avoidance, Resolution

1. Planning Schedules: The four major land managing agencies (NPS, BLM, FWS, and USFS) should notify each other on an annual basis of upcoming planning activities and of the status of ongoing planning activities. Such notification will allow agency managers, particularly in the field, to receive advance notice of nearby planning activities and will provide an opportunity for coordination of activities. A model for an agreement to exchange planning schedule information is the current BLM-USFS MOU of January 1981.

2. Data: Planning efforts should identify gaps in scientific data, particularly data, that is likely to be needed in order to better address resource conflict issues in the future; for example, the lack of baseline air quality data in many national park units. Where feasible the plans should address how to improve the collection of such data.
3. Problem Forecasting/Strategic Planning: In general Interior agencies devote little effort to identifying trends and emerging issues likely to involve potential future resource conflicts or opportunities to avoid them through interagency coordination and consultation. The Forest Service prepares a ten-year resource assessment (updated in the fifth year) as part of their planning process. Interior agencies should examine the feasibility of at least informally making long range forecasts and analyses to assist in anticipating resource conflict issues. However, a major planning exercise is not envisioned.
4. Ad Hoc Issue Planning: When appropriate the four land managing agencies should work together to study and address regional resource conflict issues. The model approach is the Interagency Grizzly Bear Task Force; other examples include regional air quality and utility rights-of-way corridors.
5. Cross Boundary Effects: In theory each agency, either through written policy or by common sense management, takes into account the effects of activities across boundaries. In either case, land managers tend to focus on activities and effects within their boundaries. Each agency should affirm or reaffirm their responsibility to (1) consider how its activities will affect resources outside its boundaries and (2) how activities outside its boundaries will affect resources inside the boundaries. This should include all activities, not just those initiated by other Federal land managers. Consideration of effects should occur during planning as well as during day-to-day operations. Where appropriate, plans should include how cross boundary effects will be addressed. As part of the implementation of this finding, each agency should determine how to include these features in its written planning policies.
6. Communication: Formal and informal lines of communication should be established among land managing agencies. Counterparts in sister agencies should be identified. Periodic

meetings (from the head of the agencies down to field staff) should be scheduled with counterparts. Ad hoc, informal meetings should be encouraged to aid in exchange of information and plans.

7. Training: In order to exchange information and to enrich agencies through the introduction of new ideas, arrangements should be made to participate in the relevant formal training sessions of other land managing agencies, as well as in less formal status meetings and briefings.
8. Personnel Management: Success in all aspects of resource conflict anticipation, avoidance, and resolution requires greater attention to activities and events outside the physical and organizational boundaries of the land managing agencies. That, in turn, depends on employees throughout the agencies being more aggressive in broadening their scope interest and becoming more involved in participating in planning, regulatory, and other activities. In order to institutionalize that participation, the following types of steps should be taken:
 - placing explicit language in position descriptions, performance standards, and other documents to hold employees accountable for coordinating and communicating with other agencies and for participating in planning, regulatory, and other "external" activities;
 - holding senior managers accountable for "enforcing" the coordination/communication/participation standards of their subordinates;
 - make the coordination/communication/participation standards an important factor in promotion decisions;
 - improve the rewards (cash, recognition) structure for good performance in coordination/communication/participation;
 - improve training in coordination/communication/participation.

Recommendations for Implementation

1. The Secretary/Under Secretary should articulate the importance of addressing resource conflicts within the existing framework of legal authorities and organizational arrangements and the importance of each agency placing a priority on effective implementation of administrative measures to improve the anticipation, avoidance, and resolution of resource conflicts. This should include a clear statement that conflicts that do require resolution at the highest levels of the Department must be those that could not be resolved or avoided otherwise, and that agencies are responsible generally for insuring that their policies avoid creating resource conflicts with other agencies.
2. Within the Interior Department responsibility for implementation should be placed with the directors of the land managing bureaus, and with the two relevant Assistant Secretaries. The Assistant Secretaries and their bureau directors should develop action plans with dates and responsible officials for:
 - reviewing and modifying formal and informal planning processes to incorporate the recommendations above as well as any other changes to improve conflict anticipation, avoidance, and resolution;
 - improving communication and coordination among land managing agencies;
 - improving personnel management to encourage resource conflict anticipation, avoidance, and resolution.
3. Incorporate the principles of resource conflict anticipation, avoidance, and resolution into the operations evaluations systems of each agency. To help ensure good faith implementation, invite members of other agencies to participate in operations evaluations reviews.
4. The Under Secretary should monitor the progress of implementation through established oversight systems.
5. Work with the Secretary of Agriculture to encourage similar initiatives in the Forest Service.



THE UNDER SECRETARY OF THE INTERIOR

WASHINGTON, D.C. 20240

June 21, 1985

Dear Senator Chafee:

As you know, the Park Protection Working Group has been meeting for the past several months. Through these meetings, it became clear that many of the issues revolved around conflicts among resources. In almost all instances there was some degree of "right" on each side and a genuine conflict existed between legitimate, and often legally-sanctioned, interests.

The Working Group, which included representatives of all Interior land managing agencies, as well as the Forest Service, has made a series of recommendations that, I believe, will allow us to address these conflicts more successfully. A copy of the Working Group report is enclosed.

The Group examined a number of cases where conflicts arose between parks and other land-managing agencies. We found that many of these conflicts were local in nature and were capable of being resolved with existing authorities. The factor which determined the success of the resolution effort in most cases was the lack of coordination and communication among the interested groups. Therefore, I asked for a review of the different planning processes in an effort to identify the systems used to recognize resource conflicts in a timely manner and to provide incentives for coordination and resolution.

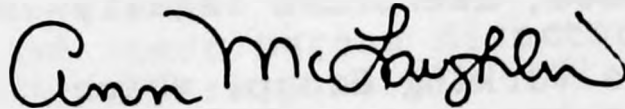
This review showed that these systems could be improved substantially. Accordingly, we have developed a program through which each Assistant Secretary and bureau director will refine the planning processes, provide financial and other incentives to employees to identify and resolve conflicts, provide enhanced training opportunities for employees, and develop better formal and informal communication channels between agencies.

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I have asked the Assistant Secretary for Policy, Budget and Administration to coordinate with the Assistant Secretaries in implementing the group's recommendations. I believe this report is the first step toward administrative changes which will improve the conflict identification, avoidance, and resolution. Hence, it will have a tangible and positive benefit to our effort to protect and use wisely our resources.

I would be pleased to discuss the effort in greater detail at your convenience.

Sincerely,



Ann McLaughlin

The Honorable John Chafee
United States Senate
567 Dirksen Office Building
Washington, D.C. 20510

Enclosure