DRAFT GMP WRITER'S GUIDE

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INTRODUCTION

WHAT IS THE GMP WRITER'S GUIDE?

The GMP Writer's Guide (Writer's Guide) is a tool to help in the preparation of a general management plan (GMP). The Writer's Guide, used on conjunction with other tools should help to produce GMPs that comply with law and policy, are consistent with national guidance, provide NPS managers with the information necessary to make management decisions, and the general public with the information necessary to meaningfully participate in discussions about park management and understand the rationale for decisions that are made. And, it is hoped that the use of the guide will lead to a more readable and concise GMP document.

While GMPs should reflect the park they are prepared for, a basic premise during the development of the Writer's Guide was that an NPS employee or the general public should be able to pick up a GMP and know where to find particular types of information regardless of where it was prepared. From this perspective, there should be consistency in the structure of the document as well as types of information presented, and the level of detail across the system. However, because parks are not created from cookie cutters the plans prepared to support them should not be either. For this reason the Writer's Guide does not include generic language to be used in particular sections of the document unless preparers really need to use the generic language. We have made an effort, when that is the case, to explicitly note this in the text of the Writer's Guide.

Because looking at examples can be helpful, the electronic version of the Writer's Guide will include examples from completed GMPs. We are not recommending that authors cut and paste from the examples provided for reference.

HOW WAS THE WRITER'S GUIDE DEVELOPED?

The Writer's Guide was developed by a team with representatives from the WASO office of Park Planning and Special Studies, Regional Planning Offices, and the Denver Service Center (DSC), with leadership provided by DSC. The work began with the outline of a complete GMP from the *General Management Planning Dynamic Sourcebook* (Sourcebook). The focus of the guide is on chapters 1 and 2 of a GMP. The rationale is that chapters 1 and 2 set the stage for the remaining chapters, and the structure and content of chapters 3 through 5 are largely set by *Director's Order -12 Conservation Planning, Environmental Impact Analysis, and Decision Making* and the DO-12 Handbook.

Please note that the Writer's Guide *does not* replace the Sourcebook or any other policy guidance but should work in conjunction with these sources. The structure and content of the Writer's Guide are based on the 2008 version of the sourcebook. The sourcebook and other guidance referenced here are updated from time to time. Writers should check the Planning website for the most recent iteration of policy or guidance.

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HOW THE WRITER'S GUIDE WILL BE UPDATED?

Like the Sourcebook, the Writer's Guide will be updated periodically based on input from users.

HOW TO USE THE WRITER'S GUIDE

Part 1 of the Writer's Guide is an outline of a GMP.

Part 2 of the Writer's Guide is a table of contents of the Writer's Guide and a description of the various parts of a GMP. The electronic version includes references to the Sourcebook and other guidance and examples as hot links.

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CHECK LIST OF THINGS TO REMEMBER WHEN PREPARING A GMP

1. All GMPs must include the "disclaimer" language regarding implementation. It should appear in the following locations:

   - in the summary
   - in chapters 1 and 2 as appropriate (see notes in the GMP Writer's Guide)

2. The GMP and all maps need numbers. These numbers can be obtained by contacting Linda Ray, Branch Chief, Graphics, DSC (303-969-2523), or Catherine Kisluk at the Technical Information Center (303-969-2135).

3. Be sure you are working with the latest guidance. Unless otherwise noted, all the resources can be found electronically at http://planning.nps.gov/tools.cfm

   - The GMP Writer's Guide
   - General Management Planning Dynamic Sourcebook (aka the sourcebook)
   - Costs associates with the GMP – Chapter 9 of the Sourcebook
   - Boundary adjustment criteria
   - Use Capacity – Chapter 8 of the Sourcebook and The Visitor Experience and Resource Protection (VERP) Handbook

     Other user capacity resources are as follows:
     - ✓ Maintaining the Quality of Park Resources and Visitor Experience: A Handbook for Managers: http://www.planning.nps.gov/document/Maintaining_Quality%20of%20Park_Resources.pdf
     - ✓ Indicators and Standards Database: http://usercapacity.nps.gov/

   - Climate change — general information at http://nrpcsharepoint/climatechange/default.aspx

     ✓ Climate change and NEPA guidance: http://nrpcsharepoint/eqd/Shared%20Documents/Forms/AllItems.aspx (and then choose "Climate Change and NEPA Guidance)

     ✓ Secretarial Order 3289, September 2009 http://www.doi.gov/climatechange/SecOrder3289.pdf

     ✓ New CE list with accompanying guidance http://www1.nrintra.nps.gov/eqd/pdf/CEs%20guidance%205.21.2009.pdf

   - Planner's Chat website http://inside.nps.gov/waso/custommenu.cfm?lv=2&prg=50&id=4690

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4. Be familiar with the latest DO-12 requirements when preparing the GMP, and consult with your regional environmental coordinator early and often throughout the process.

5. Consult the DSC *Editing Reference Manual*
   http://www.nps.gov/dsc/c_business/c_2_editing.htm

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Part 1: The Basic Table of Contents of a GMP (first- and second-level headings)

The purpose of this part is to provide the writer with an overall view of how a GMP is put together.

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PART 1: TABLE OF CONTENTS FOR A GMP

Cover
Abstract (must be one page)
How to Use this Plan
How to Comment on this Plan (DEIS only) (can go on back of abstract page)
Summary of the Plan
Table of Contents

Chapter 1: Introduction to the Park and to the General Management Plan
- Introduction
- Brief Description of the Park
- Overview of the NPS Planning Process
- Purpose of the Plan
- Need for the Plan
- Elements of the Foundation Document
- Scope of the General Management Plan
- Impact Topics (including both topics considered and dismissed)
- Relationship of Other Planning Efforts to this General Management Plan
- Next Steps in the Planning Process
- Implementation of the Plan

Chapter 2: Alternatives, Including the Preferred Alternative
- Introduction
- Formulation of Alternatives
- The Proposed Alternatives
- User Capacity
- Mitigation Measures
- Needed Future Studies and Plans
- The Environmentally Preferred Alternative
- The NPS Preferred Alternative
- Alternatives and Actions Considered but Dismissed from Further Consideration
- Alternative Comparison Tables

Chapter 3: Affected Environment
- Natural Resources
- Cultural Resources
- Visitor Uses and Experiences
- Socioeconomic Environment
- NPS Operations

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Chapter 4: Environmental Consequences

Introduction
Methodology and Assumptions for Analyzing Impacts (Impact Thresholds)
Cumulative Impact Analysis
Impairment of Resources
Analysis of Impacts
Adverse Impacts that Cannot be Avoided
Relationship between Local Short-Term Uses and Long-Term Productivity
Irreversible and Irretrievable Commitments of Resources

Chapter 5: Consultation and Coordination

Brief History of Public Involvement
Consultations with other Agencies and Organizations
Future Compliance Requirements
Public Officials, Agencies, and Organizations Receiving this Plan
Summary of Comments Received (FEIS only)
Response to Substantive Comments (FEIS only)

Appendixes, References, List of Preparers, and Index

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PART 2 – DETAILED DISCUSSION

The purpose of this part is to provide the writer with details of the chapters and sections in a GMP, sometimes including sample language and references, as appropriate.

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COVER

Optional: Letter from the superintendent (in a draft plan, this letter is usually an unattached insert so that the date for the ending of the comment period can be included).

> Draft GMP/EIS/EA: Note the importance of the public participation to date and the importance of commenting on the draft.
>
> Final GMP/EIS: Thank the public for their participation in the development of this plan and note how comments have influenced the plan.

(LINK)

ABSTRACT (1 PAGE)

This needs to be one page and include the party responsible for preparing the plan (the park) and if appropriate, any cooperating agencies; the title of the plan; the state(s) and county(ies) where the park is located; the name, address, and telephone number of the person who can supply more information; a designation of the document as a draft or final; and the date by which comments must be received. A brief summary of the plan should be provided.

HOW TO USE THIS PLAN

Description of how the document is presented and what is discussed in each section. The idea here is to describe how the GMP/EIS is put together for someone who has never read one before.

HOW TO COMMENT ON THIS PLAN (FOR DRAFT PLANS ONLY)

You will want to include information on how to comment on the plan. There are a number of ways to comment on plans — provide the pertinent information here. You may want emphasize commenting on PEPC as the preferred approach.

> **REQUIRED** — To notify readers that we may not be able to keep their personal information confidential, you must include the following language. This specific language has been approved by the solicitor and reconfirmed on 7/06/09 in an e-mail to Park Planning and Special Studies — WASO.
>
> > *Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment — including your personal identifying information — may be made publicly available at any time. Although you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.*

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SUMMARY OF THE PLAN

Within the summary, which should be about 2-3 pages, include the following:

- Summary of the purpose and need for the plan (do not cut and paste from the purpose and need section).
- Summary of the alternative concepts, including key impacts (not the exhaustive laundry list – focus on impacts to important resources in the park).
- Note the NPS preferred alternative.
- Highlight other BIG decisions or unusual approaches (e.g., if there is a boundary change that adds a lot of land, if the environmentally preferred is different from the agency preferred alternative, etc.).
- If this is a final document, include a brief discussion of comments received (how many, etc.).

REQUIRED — include this text, or similar, regarding implementation of the plan. You may want to call this out in its own subsection within the summary.

> *The approval of this plan does not guarantee that the funding and staffing needed to implement the plan will be forthcoming. The implementation of the approved plan will depend on future funding, and it could also be affected by factors such as changes in NPS staffing, visitor use patterns, and unanticipated environmental changes. Full implementation could be many years in the future. Once the GMP has been approved, additional feasibility studies and more detailed planning, environmental documentation, and consultations would be completed, as appropriate, before certain actions in the selected alternative can be carried out.*
> *Future program and implementation plans, describing specific actions that managers intend to undertake and accomplish in the [insert park unit], will tier from the desired conditions and conditions and long-term goals set forth in this general management plan.*

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{SB pp.1-5 to 1-7}

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CHAPTER 1: INTRODUCTION TO THE PARK AND TO THE GENERAL MANAGEMENT PLAN

{SB pp. 1, 1-1 to 1-2}

INTRODUCTION

This is a brief description of the purpose of the chapter.

BRIEF DESCRIPTION OF THE PARK

The purpose of this section is to provide readers with a general sense of the park and create some interest; we are trying to draw people in. Some things to consider when drafting this section include the following:

- Where is the park located?
- What is important about it?
- What is the history?
- Why was the park established? Who advocated for the park and why?
- What are some of the facts (visitation, acreage, number of units, etc.)?
- What is it about this park that makes it unique in the national park system?
- What has happened in the park after the period of significance?

General Note: This section should be brief and may not need to be longer than one or two pages. It may be helpful to look at text from the park brochure or website for concise descriptions of the park. The intent of this section is to engage the public in the history and future of the park and give them enough description so that they will understand what they will be reading about in the first two chapters. Do not repeat what is in the section called "Elements of the Foundation Document."

Note on graphics: In addition to a park map it is helpful to also include a regional map so readers know where the park is. Pictures can also provide a good sense of the park.

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OVERVIEW OF THE NPS PLANNING PROCESS

The purpose of this section is to explain in general why the Park Service plans, and what elements are required in a GMP.

- Why the NPS plans

(LINK)

- What is required in a GMP

The National Parks and Recreation Act of 1978 (Public Law 95-625) and the Redwood Amendment of 1978 (PL 95-250 Sec. 101(6)(b)) requires the preparation and timely revision of general management plans for each unit of the national park system. The National Park Service management policies call for each GMP to "set forth a management concept for the park [and] establish a role for the unit within the context of regional trends and plans for conservation, recreation, transportation, economic development, and other regional issues." Congress has also specifically directed the National Park Service, as part of the planning process, to address the following elements (16 U.S.C. 1a-7[b]):

> General management plans for each unit shall include, but not be limited to:
>
> ✓ measures for the preservation of the area's resources
> ✓ indications of types and general intensities of development (including visitor circulation and transportation patterns, systems, and modes) associated with public enjoyment and use of the area, including general locations, timing of implementation, and anticipated costs;
> ✓ identification of an implementation commitment for visitor carrying capacities[now called user capacity] for all areas of the unit; and
> ✓ indications of potential modifications to the external boundaries of the unit, and the reasons therefore.

What Does the National Park Service Consider When Developing a GMP?

The purpose of this section is to describe what we consider.

- NPS Organic Act
- The "Foundation for Planning and Management" (aka the foundation document) for the park
- Servicewide laws and policies

(LINK)

How Are National Environmental Policy Act Requirements Integrated into the Plan?

The purpose of this section is to describe NEPA and why it is included in the planning process.

> Note: this discussion does not need to be any longer than about a paragraph; we just want to discuss how we integrate NEPA into planning. When looking at the "Why the NPS Plans" examples, check for this language to see if it is already included.

How Did Public Involvement Inform the Plan?

The purpose of this section is to describe why and how public participation influenced the plan.

- Why is public participation important in the planning process?
- In what phases of the planning process is the public invited to participate?
- How did public participation influence this document?

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- The details of public involvement are described in Chapter 5: Consultation and Coordination.

PURPOSE OF THE PLAN

The purpose of this section is to provide readers with an overview of the purpose of THIS plan and what it will accomplish. Specifically the GMP will

- fulfill the requirements of the National Parks and Recreation Act of 1978 and the Redwood Amendment of 1978
- provide comprehensive guidance for the next 15–20 years
- serve as a framework to assist in making decisions
- articulate the shared vision between park management and the public on how to best achieve the park's purpose and protect its resources for future generations
- if the National Park Service shares jurisdiction of park lands or resources with another agency, describe the management responsibilities of the two agencies

Specifically the GMP will NOT

- describe how particular programs or projects will be implemented or prioritized; these decisions are deferred to detailed implementation planning
- provide specific details and answers to all the issues facing the park
- provide funding commitments for implementation of the plan

{SB pp.1-3, 4-10, DO-12H; pp.16, 49-50}

NEED FOR THE PLAN

The purpose of this section is to provide readers with an overview of why THIS plan is needed.

- In general, what are the broad topics that drive the need for the plan — as opposed to the specific issues and concerns that may have been described during the scoping process. The PMIS statement may also have some useful information.

  For example, has something changed since the last GMP or master plan?

  - ✓ Have new lands have been added to the park?
  - ✓ Has land use outside the park changed?
  - ✓ Have visitor use patterns changed?
  - ✓ Are there new congressional/legal actions that need to be addressed — e.g., the addition of a new park unit?
  - ✓ Are there new threats to resources, e.g., global climate change
  - ✓ Is a boundary adjustment needed and why?

{SB pp.1, 3-1, 3-9, 4-10; DO-12H, pp.16, 49-50}

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ELEMENTS OF THE FOUNDATION DOCUMENT

The purpose of this section is to provide the readers with an overview of the foundation document, its importance to planning in general, and your specific GMP in particular.

- What is the foundation document?

  Note: In the *Park Planning Standards*, this section is called the "Foundation for Planning and Management." Over the years, the section has become known as the "Foundation Document, and we will use that short title in this guide.

  The foundation document helps to establish the sidebars for park management because it clearly articulates what is important about the park. This information is important for all planning documents, not just the GMP. Some language that can be used to describe a foundation document follows (the language is adapted from the *Park Planning Program Standards:*

  > The foundation document defines the legal and policy requirements that mandate the park's basic management responsibilities, and describes the resources and values that are fundamental to achieving the park's purpose as well as those that are otherwise important. Although all units of the national park system must be managed in compliance with a large body of federal laws and policies, each park has its own specific purpose, established by Congress or the president, which provides the context for park management.

- How does it relate to GMP planning?
- If a stand-alone document was produced, is it available and where would the GMP reader find it?

{SB pp.6-1 to 6-4}

Park Purpose

Describe in general how the purpose of a park unit is determined.

- Describe the materials that were used to determine the park's purpose.
- What is the park purpose?

{SB pp. 6-6 to 6-7}

Park Significance Statements

Describe in general how significance statements are developed.

- Describe how the park's significance statements were developed — e.g., what aspects of the park purpose did the participants in the foundation workshop choose to elaborate on and why?
- What are the park's significance statements?

{SB pp. 6-8 to 6-10}

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Fundamental and Other Important Resources and Values

- What are fundamental and other important resources and values?
- How were the fundamental and other important resources and values identified — that is, what aspects of the park's purpose and significance statements did the participants in the foundation workshop choose to elaborate on and why?
- What are the fundamental resources and values in the park?
- What are the other important resources and values in the park (if any were identified)?

{SB pp.6-12 to 6-21, appendix pp. E-9 to E-11}

Primary Interpretive Themes

- What are primary interpretive themes?
- Why are primary interpretive themes important in the GMP process?
- How were the primary interpretive themes developed for this park and when? If it was outside the GMP process, were the themes reconfirmed during the development of the foundation document?
- What are the primary interpretive themes for this specific park unit?

{SB pp.6-21 to 6-28, appendix pp. E-13 to E-14}

Special Mandates and Administrative Commitments

- Define special mandates and administrative commitments.
- Describe any special mandates, their source, and their impacts with respect to park management.
- Describe any administrative commitments, their source, and their impact with respect to park management.

{SB pp.6-5 to 6-10, appendix pp. E-10 to E-11}

Summary of NPS Legal and Policy Requirements / Servicewide Laws and Policies

The purpose of this section is to describe the laws and policies that must be considered and their influence on park management in general. It is also a good place to remind the GMP reader that even though certain laws or policies may not be specifically referenced in the alternatives, they are part of the framework for decision making.

Consider if it is necessary to highlight some laws or policies that are particularly important or relevant to the GMP. If so you may want to discuss these here in text.

Note: After an introductory discussion this section could be written as text or presented as a table. Some prefer to put the tables in an appendix.

{SB pp.6-28 to 6-29, appendix pp. E-15 to E-16}
Other tools: Workflows website — list of optimum conditions based on law and policy

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Analysis of Fundamental and Other Resources and Values

(Optional for inclusion in the GMP)

Note: some writers have chosen to include the analysis of the fundamental and other important resources and values in the text of the document or to provide directions to the information (e.g., at the park or as a link on a website etc.).

SCOPE OF THE GENERAL MANAGEMENT PLAN

The purpose of this section is to describe what is going to be discussed and what is not going to be discussed. These are the issues that were raised during internal discussions with park staff and external discussions with stakeholders and the general public during scoping.

{SB pp.1-3, 3-9, 4-13 to 4-14, 7-2; DO-12H, pp.18-19}

GMP Issues/Concerns to Be Addressed

Issues and Concerns to Be Addressed

- Try to avoid just repeating text from "Need for the Plan." This is the place to elaborate on the issues that came up during scoping and would reflect the issues that are described in the "Need for the Plan." E.g., a boundary adjustment has occurred (as noted in the "Need for the Plan") and scoping provided some additional information about interests or issues related to the new lands. All this information should be reflected in the issues.
- What are the planning issues and concerns that were discussed with the park staff, stakeholders, and the general public during the scoping process that this GMP will address?
- How are the issues raised connected to fundamental and other important resources and values?

Issues and Concerns Not Addressed

- What are the issues or concerns that were raised by the park staff, stakeholders, and the general public during the scoping process that this GMP will not address and why?

  ✓e.g., the issues or concerns are part of the day-to-day management of the park
  ✓the suggested actions would be against law or policy
  ✓the suggested actions are covered by existing law or policy (e.g., management of endangered species)
  ✓other reasons for not including an issue or concern

{SB pp.7-2 to 7-6; DO-12H, pp.49-50}

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IMPACT TOPICS (INCLUDING BOTH TOPICS CONSIDERED AND DISMISSED)

- What are impact topics, and how was the list of impact topics developed?
- What are the impact topics based on? (federal laws, actions proposed in the plan, CEQ, etc.)
- Be sure to make an explicit connection between the NEPA process and the impact analysis and the GMP. You may want to remind readers about the discussion under the section "How are National Environmental Policy Act Requirements Integrated into the Plan?" but do not cut and paste the text.

(LINK: environmental screening form, DO-12)

Impact Topics Considered and Analyzed in Detail

List and describe.

Impacts Topics Considered but Not Analyzed in Detail

List and describe and be sure to note why these topics are not analyzed in the document.

{SB pp.10-1 to 10-4}

> **Note:** It is important to use language that is reader friendly and avoid NEPA jargon to the extent possible. Avoid "trust us" statements. Please refer to DO-12 for additional guidance.
>
> *(LINK)*

RELATIONSHIP OF OTHER PLANNING EFFORTS TO THIS GENERAL MANAGEMENT PLAN

The purpose of this section is to describe other planning efforts that could affect or be affected by this plan.

> **Note**: It is not necessary to describe all planning efforts in areas outside the park. Focus on the plans that are most likely to have an impact on the park. Remember to provide enough information so the GMP reader understands the potential connection between the GMP and the proposed action or plan. E.g., is a proposed action in your GMP consistent/inconsistent with a local, state, or regional existing plan or proposed action? Remember that plans described here could include NPS actions that are separate from this GMP as well as those outside the boundary.

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NEXT STEPS IN THE PLANNING PROCESS

The purpose of this section is to generally describe the next steps in the planning process. In general the GMP reader should be able to answer the following questions:

- What happens after the draft GMP is distributed?
- What will the final GMP include?

Sample language for the draft could read as follows:

After distribution of the Draft General Management Plan/Environmental Impact Statement, *there will be a 60-day public review* and comment period, after which the NPS planning team will evaluate comments from other federal, state and local agencies, organizations, businesses, and individuals regarding the draft plan. Appropriate changes will be incorporated into the* Final General Management Plan / Environmental Impact Statement. *In addition, the final plan will include letters from governmental agencies and tribes (if applicable), any substantive comments on the draft document, and NPS responses to those comments. Following distribution of the final plan, the "Record of Decision" (ROD) will document the NPS selection of an alternative for implementation. Once the ROD is signed by the regional director, and following a 30-day waiting period, the plan can then be implemented. See page ___ for instructions on how to comment.*

Note: if the plan being prepared is an environmental assessment instead of an EIS, then the decision document would be a "Finding of No Significant Impact" (FONSI). Here is sample language for an EA.

After the distribution of the General Management Plan /Environmental Assessment, *there will be a 30-day public review and comment period* after which the NPS planning team will evaluate comments from other federal, state, and local agencies, organizations, businesses, and individuals regarding the plan. Appropriate changes will be incorporated into a "Finding of No Significant Impact" (FONSI) (instead of a "Record of Decision"), which documents the NPS selection of an alternative for implementation. In addition, the FONSI will include as an attachment any necessary errata sheets for factual changes required in the EA, as well as responses to substantive comments by agencies, organizations, or the general public. Once the FONSI is signed by the regional director, and following a 30-day waiting period, the plan can then be implemented.*

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Sample language for the final plan — take the language from the draft and change the tense to reflect what has been completed.

* Note number of days that the plan will be on review

{SB pp. 1-8 to 1-9, 4-11 to 4-12}

IMPLEMENTATION OF THE PLAN

- What is implementation dependent upon?
  - ✓ funding and staffing
  - ✓ required site-specific planning

- Some actions may be phased over time or be contingent on other actions (e.g., land may need to be acquired before the new visitor facility is built).
- Other reasons may also be applicable.

Note: There is some standard recommended language related to implementation of the plan provided by WASO. There are a number of options.

The longer statement, also used in the summary, is as follows:

> *The approval of this plan does not guarantee that the funding and staffing needed to implement the plan will be forthcoming. The implementation of the approved plan will depend on future funding, and it could also be affected by factors such as changes in NPS staffing, visitor use patterns, and unanticipated environmental changes. Full implementation could be many years in the future. Once the general management plan has been approved, additional feasibility studies and more detailed planning, environmental documentation, and consultations would be completed, as appropriate, before certain actions in the selected alternative can be carried out. Future program and implementation plans, describing specific actions that managers intend to undertake and accomplish in the park, will tier from the desired conditions and conditions and long-term goals set forth in this general management plan.*

A more abbreviated statement is as follows:

> *The approval of a plan does not necessarily guarantee that the funding and staffing needed to implement the plan with be forthcoming. Full implementation of the approved plan may be many years in the future.*

An alternative approach to the above paragraph that also incorporates scheduling and prioritization and the possibility or the presence of partnerships is as follows:

> *The implementation of the approved plan, no matter which alternative, will depend on future NPS funding levels and servicewide priorities, and on partnership funds, time, and effort. The approval of a general management plan does not guarantee that funding and staffing needed to implement the plan will be forthcoming. Full implementation of the plan could be many years in the future.*
>
> *{SB p.12-15}*

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CHAPTER 2: ALTERNATIVES, INCLUDING THE PREFERRED ALTERNATIVE

INTRODUCTION

The purpose of this section is to introduce the topics that will be discussed in the chapter and how they all fit together. The alternatives themselves will be discussed in detail later in the chapter. This should be an introduction to the chapter as a whole, not just the alternatives in the GMP.

FORMULATION OF ALTERNATIVES

This discussion is general and sets the stage for the discussion about the alternatives developed for the GMP.

- What is a GMP alternative?
  Note: Refer to section 7.2.1 in the SB for a discussion of the hierarchy of types of management decisions.
- Why is there a no-action alternative?
- Note that GMP alternatives focus on what resource conditions and visitor experience conditions will be available/provided, not on how the conditions will be achieved.
- Describe the key issues that the action alternatives will address. (Again — don't cut and paste from chapter 1.)
- What is a management zone, why do we use them, and how do they relate to the alternatives?
- Define "desired condition" from the perspective of both NPS policy and the park.

Why is there a range of alternatives?

- There is more than one way to manage the park resources and to address the planning issues, to achieve the purpose, maintain significance, and preserve the fundamental resources and values.
- The alternatives should reflect the range of stakeholders' interests in the park.
- How were the alternatives developed?
- What the alternatives are based on — e.g., fundamental resources and values, primary interpretive themes?

{SB pp.7-1 to 7-41; DO-12H pp.20-22, 50}

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Identification of the Environmentally Preferred Alternative

- Generally describe the process used to identify the environmentally preferred alternative, based on the CEQ guidance (E.g., there are six criteria that the alternatives will be compared to – do not describe the comparison here that will be completed at the end of the chapter).

- Note the environmentally preferred alternatives is sometimes the same but not always the same as the NPS preferred alternative.
- It is useful here to explain why we have two types of preferred alternatives.
  - ✓ The environmentally preferred is required by NEPA Section 101
  - ✓ The NPS preferred takes into account not just environmental impacts but also benefits and costs.

Note: If you like, let the reader know on which page the complete analysis begins.

Identification of the NPS Preferred Alternative

- Do not describe the NPS preferred alternative here; the point is to describe why we have one.
- What was the approach used to identify the preferred alternative? If you used a CBA process, here is some sample language you could use.

> *The National Park Service uses a value analysis method called "Choosing by Advantages," or "CBA," to decide which GMP alternative is the preferred alternative. The CBA process is a tool for determining the specific advantages each alternative would provide towards meeting specific park objectives. The advantages described in the CBA process represent the benefits that would be gained under each alternative. The advantages for each alternative are compared to the expected costs of each alternative to determine the cost/benefit ratio of each alternative. The alternative that provides the most benefit per dollar, with the least adverse environmental impacts, is the best value alternative and the one that is labeled "preferred" in this plan.*
>
> **Note**: If another approach is used to determine the NPS preferred alternative it must be described.
>
> **Note:** If you like, let the reader know on which page the complete analysis begins.
>
> *{SB pp.11-1 to 11-15; DO-12H pp.51-52}*

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Consideration of Boundary Adjustment(s)

- This topic must be discussed in the GMP even if no boundary adjustment is proposed.
- The text describing the criteria for boundary adjustments can be included here or in an appendix if a boundary adjustment is being proposed. The actual proposals for a boundary adjustment would be included in each alternative.

{SB pp.4-3 to 4-6}

User Capacity

- What is user capacity and why is it important?

- Describe the general approach the National Park Service takes in GMPs to address the user capacity requirement, including development of management zones, indicators, standards, and monitoring and management strategies.

  Note: This is a general and short description of why we care about user capacity and how does it relate to the alternatives.

Note to GMP writer: The sections above contributed to and were all part of the process for developing the alternatives. Be sure you have made the connections clear to the GMP reader. If you think it would be helpful to refer GMP readers to the details sections on the above topics you could refer to the reader to the specific page or section.

THE PROPOSED ALTERNATIVES

{SB pp. 7-13 to 7-19}

Potential Management Zones Used in the Action Alternatives

- Identify and describe the range of management zones used in the action alternatives
- Note in the no-action alternative if you have zoning from a previous plan.

In each zone describe
- desired natural and cultural resource conditions*
- desired visitor experiences*
- appropriate kinds and levels of management, development, and access*
- roles and responsibilities of potential partners, concessioners, cooperating associations etc., if applicable

* This information will contribute directly to the user capacity discussion and the development of indicators and standards that are described later in this chapter.

Note: a table is an effective approach to organizing the description of the management zones.

{SB pp. 7-15 and 7-16, 7-22 to 7-32; appendix pp. F-8 to F-21}
(LINK)

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Description of the Alternatives

When describing the alternative concept for each alternative, include the following:

- Describe the concept/vision for the overall character and future of the park.
- Describe the primary driver(s), the rationale behind the concept for each alternative, that provide cohesive direction and connect the management of resources, visitors, and facilities.

- Explain how each concept moves beyond the no-action alternative. Be sure not to begin the impact analysis; this is an objective discussion of the key differences between the no-action and an action alternative.
- Identify the NPS preferred alternative but do not describe how the preferred alternative was selected here (note the methodology is explained later along with the environmentally preferred alternative).

{SB pp.7-20 to 7-21; appendix pp.F-1 to F-7}
(LINK)

Management of Specific Areas (e.g., Uses, Facilities, Access) for Each Alternative
There are two approaches to consider; make the approach you choose consistent for all alternatives.

1. Describe the specific desired conditions and management actions within each of the management zones for each alternative. Examples are helpful, but do not get so specific that the park is locked into a particular approach before the site-specific planning is completed. For example when describing a campground, talk about the function of the campground (e.g., car camping vs. hike-in camping instead of specifically describing the campground size, number of sites, etc.).
2. Describe the specific desired conditions or management actions by geographic location in the park; be sure to note the zone the geographic area is located within.

Be sure to note when
- fundamental or other important resources and values are located within a zone or a geographic area
- new facilities would be developed, or existing facilities would be moved or removed.

Note: The intent of this section is to provide some concrete examples of the actions that could occur under each of the alternatives. Again, in describing the alternatives, be careful not to get so specific that it could lock in the park to a particular approach.

{SB pp.7-35 to 7-38}

Include a map of each alternative with management zones shown.
- Include a map showing where the zones are applied in the alternative.
- As with all maps, be sure to include a map identification number, which is required and given by the Technical Information Center (TIC) in Denver. (See the "Checklist of Things to Remember" on page 5.)

{SB pp.7-32 to 7-35}

Note: With respect to actions common to all alternatives, there are two approaches. For example: the first time the action appears in an alternative it could be fully described. The next time it appears the author could refer to the original reference. In this way it does not matter if the action appears only in the action alternatives or if it also appears in the no-action alternative. Alternatively,

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the action could be fully described in each alternative. Regardless of the approach used, be sure to address these actions in Chapter 4: Environmental Consequences.

Partnerships (if applicable)

- Describe any partnerships with other agencies or organizations and how these partnerships would further the concept of the alternative. (e.g., sharing programs and/or facilities, staff expertise, research, resource management).

Boundary Adjustments (if applicable)

- Describe how a boundary adjustment would accomplish NPS goals (e.g., provide access and/or protect resources critical to fulfilling the park's purpose).
- Is there statutory authority to propose a boundary adjustment for the park or would new legislation be required?
- Unless the approach that will be taken to accomplish the boundary adjustment can be definitively described, just give an overview of the approaches that could be used — e.g., fee-simple acquisition or land exchange.

Note: It is important to describe how the proposed boundary adjustment meets the criteria for potential boundary adjustments identified in NPS *Management Policies 2006* (sec. 3.5) and in the *NPS Criteria for Boundary Adjustments, Supplement to Planning Process Guideline*. This discussion can be included in an appendix or as part of the discussion in each alternative.

Note: If a boundary adjustment would not be appropriate, but other land protection measures would be considered describe the other approaches, e.g., an easement, or a cooperative approach not involving a boundary adjustment here. You may want to consider having this discussion as a separate section entitled "Land Protection."

MAP: Show the proposed boundary adjustment on the map for each alternative if possible.

{SB pp. 4-3 to 4-6, appendix C-1 to C-7}
(LINK: 1991 NPS Criteria for Boundary Adjustments, Supplement to Planning Process Guideline)

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Implementation Priorities and Phasing (optional)

If appropriate, identify the priority for actions that could be taken, or identify phases in which that different actions could be taken.

Note: One of the purposes of this section is to manage expectations. In addition to noting any priority actions it is important to note that

- some actions may be required before other actions can occur, and
- the park could take some actions out of priority order if the opportunity presented itself.

Estimated Costs and Staffing

- Describe the major costs of each alternative, including changes in operations and maintenance.
- Include a general explanation of the total FTE staffing levels for each of the alternatives.
- Discuss partnership opportunities if appropriate.

{SB pp.9-1 to 9-11; appendix pp. H-1 to H-6}

USER CAPACITY

- Describe how and why user capacity indicators and standards were identified for this GMP.
- Include a table of the indicators, standards, monitoring strategies, and potential management strategies for each management zone.
- Describe how the indicators and standards might be modified in the future.

Note: Be sure to incorporate the effects of managing user capacity in the impact discussion.

Note to GMP writer: The language for addressing user capacity in GMPs is evolving (because of past litigation); be sure to work with the latest approach.

{SB pp.8-1 to 8-18; appendix pp. G-1 to G-2}
(LINK: examples from GOGA)

MITIGATION MEASURES

- Include a list of applicable mitigation measures that would be followed under some or all of the action alternatives to address potential impacts on cultural resources, natural resources, visitor safety and experiences, or other topics as necessary.
- Be sure the mitigation measures are reasonable, and that the park staff can commit to implementing the measures.

Note: Typically the mitigation measures are brought directly into the decision document (ROD or FONSI), so the National Park Service is committing to implementation. Unless the National Park Service is committing to a particular approach to mitigating a particular impact, the mitigation measures should describe the outcome as opposed to a particular approach.

{SB pp.10-8 to 10-9; appendix pp. I-7 to I-10}

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NEEDED FUTURE STUDIES AND PLANS

- It is not necessary to be exhaustive. Describe plans that are high priority — such as plans that are necessary to implement the alternatives.
- Note that other plans may be identified in the future.

{SB p.1-4}

THE ENVIRONMENTALLY PREFERRED ALTERNATIVE

- This section describes the rationale for the selection of the environmentally preferred alternative as described in the CEQ requirements.
- Be sure to compare all alternatives to the six criteria outlined in the CEQ requirements.
- The environmentally preferred alternative is the alternative(s) that best meets the six goals identified in section 101b of NEPA.

{SB pp.11-15 to 11-16; appendix pp.J-7 to J-9; DO-12H, pp. 22-23}

THE NPS PREFERRED ALTERNATIVE

- Describe the CBA process or any other process that might have been used to identify the NPS preferred alternative.
- Be sure to include the rationale for the selection of the NPS preferred (E.g., what factors were used during the CBA process and why were these factors chosen).
- In general, the NPS alternative and the environmentally preferred alternative are the same. However, they can be different. If the NPS preferred alternative is not the same as the environmentally preferred alternative, be sure to include a good rational to support the decision.

{SB pp. 11-1 to 11-16; appendix pp. J-1 to J-6}

ALTERNATIVES AND ACTIONS CONSIDERED BUT DISMISSED FROM FURTHER CONSIDERATION

Include a brief description of any alternatives or actions of interest to the public that the planning team considered but dropped from consideration, and an explanation of why the alternative or action was dismissed.

{SB p. 7-19}

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ALTERNATIVE COMPARISON TABLES

Summary Comparison of the Alternatives

- Describe the key differences between all the alternatives (including the no-action) in table form.

Summary Comparison of the Costs of the Alternatives

- Include a summary table that provides a cost comparison of all the alternatives (including the no-action) and a disclaimer regarding the cost figures.
- Use table 9.1 in the sourcebook to format the cost table.

{SB pp. 9-2 to 9-5, 9-9}

Summary Comparison of the Impacts of the Alternatives

- Include a brief conclusion on the effect of each alternative on each impact topic being analyzed.

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CHAPTER 3: AFFECTED ENVIRONMENT

{SB pp.10-4 to 10-5}

This section is a description of aspects of the natural and cultural resources, visitor uses and experiences, the socioeconomic environment, and NPS operations that would be impacted by the proposed alternatives and so will be analyzed in chapter 4.

Important things to remember:

- Focus on the resources in the park likely to be impacted.
- The organization of the Affected Environment and Environmental Consequences should be consistent with the organization of impact topics described in chapter 1.
- It is helpful to provide some introductory information or background to provide context to the various topics. In this section do not just repeat the information from the brief description of the park in chapter 1.
- Be sure that the text is readily understandable. Readers should not have to be an expert to understand the information presented. Avoid jargon and technical terms that have not been defined.

NATURAL RESOURCES

CULTURAL RESOURCES

VISITOR USES AND EXPERIENCES

SOCIOECONOMIC ENVIRONMENT

NPS OPERATIONS

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CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

{SB pp.10-5 to 10-27; appendix I-1 to I-10; DO-12H, pp. 54-59}

The purpose of this chapter is to describe the impacts of the proposed actions to natural and cultural resources, visitor uses and experiences, the socioeconomic environment, and NPS operations that have been described in chapter 3.

Important things to remember:

- The organization of the Environmental Consequences chapter should be consistent with the organization of impact topics described in chapter 1 and in chapter 3.
- Be sure that the text is readily understandable. Readers should not have to be an expert to understand the information presented. Avoid jargon and technical terms that have not been defined.

INTRODUCTION

METHODOLOGY AND ASSUMPTIONS FOR ANALYZING IMPACTS (IMPACT THRESHOLDS)

{SB pp. 10-5 to 10-8, 10-14 to 10-20}

CUMULATIVE IMPACT ANALYSIS

{SB pp. 10-9 to 10-10; appendix pp. I-2 to I-6}

IMPAIRMENT OF RESOURCES

{SB pp. 10-11 to 10-13}
(LINK)

ANALYSIS OF IMPACTS

Note: Impacts can be analyzed by alternative or by topic area.

Analysis of each topic should include the following:

- Analysis of impacts
- Analysis of cumulative impacts
- Conclusion and impairment findings

{SB pp. 10-13 to 10-14}
(LINK)

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ADVERSE IMPACTS THAT CANNOT BE AVOIDED

{SB P. 10-21}

RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES AND LONG-TERM PRODUCTIVITY

{SB pp. 10-20}

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

{SB p. 10-21}

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CHAPTER 5: CONSULTATION AND COORDINATION

{SB pp.10-27 to 10-29}

BRIEF HISTORY OF PUBLIC INVOLVEMENT

CONSULTATIONS WITH OTHER AGENCIES AND ORGANIZATIONS

FUTURE COMPLIANCE REQUIREMENTS

PUBLIC OFFICIALS, AGENCIES, AND ORGANIZATIONS RECEIVING THIS PLAN

SUMMARY OF COMMENTS RECEIVED (FEIS ONLY)

RESPONSE TO SUBSTANTIVE COMMENTS (FEIS ONLY)

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APPENDIXES, REFERENCES, LIST OF PREPARERS, AND INDEX

{SB pp. 10-29 to 10-31}

Include consultants, if they helped write the GMP, in the list of preparers.

The sourcebook index should be a good reference for key words. Take a look, pull out the words that are important to your GMP and your stakeholders, and include other key words specific to your park (e.g., cultural resources, place names, special status species, etc.).

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