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APPENDIX K: PROJECT COMPLETION

K.1 POST-PROJECT REVIEW FORM

GMP Post-Project Review Form

Park _____ Region _____

Form preparer _____ Date _____

Person interviewed _____ Role in plan _____

Identify the key elements of the project that contributed most to the project's success (or failure) and why.
Were the park's expectations before the beginning of this planning process met by the plan? What results occurred that weren't expected, didn't occur that were expected?
What were the most valuable results of the planning project? (rank) Clear delineation of the park purpose and mission. Improved public understanding of and support for park purposes and values Establishment of management zones and prescriptions for desired conditions Agreement on major priorities for maintenance, resource management, and visitor services Guidance for facility development Provides basis for increased funding and funding requests Other results?

Do you think the value of the project results was worth the investment of time and money? What cost savings measures would you recommend?
Were the basic needs and problems of the park completely identified during the scoping process and development of the project agreement? If not, what were the most important needs and problems that were not identified and why were they overlooked?
Is the level of detail in the plan: too low, about right, too high?
What were the major stumbling blocks in this project? What would you recommend to other projects to avoid these same pitfalls?
Was any part of the process contracted and were the results worth the cost? Would you recommend increased use of contractors to other parks? If so, what parts of the process would you contract?

What was the makeup of the project team (DSC, park, region, other)? Was the size of team and the disciplines represented appropriate for this project? If not, what was missing?
Do you think the project could have been done in less time? If so, what aspects of the project do you think could be shortened and what do you recommend to shorten them?
How effective were various public participation methods? (not used, not productive at all, moderately productive, very productive) Workshops/public meetings/open houses Surveys Newsletters/workbooks Website Written responses, i.e. letter Focus groups Interagency meetings Other
What other changes would you recommend to improve the process the next time?

Additional information to be completed only by planning team lead:

Project start date (NOI)_____Planning team lead _____

Park Superintendent _____

Key park participants
_____

_____

Final GMP publication date _____

Cost of project broken down by fiscal year and by park, region and DSC

FISCAL YEAR	DSC	REGION	PARK
TOTAL			

K.2 ADMINISTRATIVE RECORD GUIDANCE FROM THE U.S. DEPARTMENT OF JUSTICE

United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D.C. 20240

IN REPLY REFER TO.

Memorandum

JUN 27 2006

To: Assistant Secretaries
Directors of Bureaus and Offices

From: David L. Bernhardt
Deputy Solicitor

Subject: Standardized Guidance on Compiling a Decision File and an Administrative Record

The Office of the Solicitor has developed guidance to assist you and your employees when compiling Decision Files and administrative records. This information should be useful to Bureaus and Offices when handling electronic materials and drafts encountered in the decision-making process. In the future, this guidance will be incorporated into the Departmental Manual.

As many of you are aware, decision files and administrative records document the Department's decision-making process and record the basis and rationale for making the decision. Decision Files should be created contemporaneously with development of agency decisions, while administrative records evidence the Department's basis for defending agency decisions.

If you have any questions about the contents of this guidance, please contact Art Gary, Associate Solicitor, Division of General Law.

cc: Regional and Field Solicitors

Attachment

Department of the Interior Standardized Guidance on Compiling a Decision File and an Administrative Record

PART A – INTRODUCTION

I. Purpose of This Guidance

The purpose of this guidance is to provide Bureaus and Offices within the Department of the Interior standardized procedures for compiling a Decision File for the records that contemporaneously document any decision and, if necessary, an administrative record ("AR") for judicial review. These procedures apply to the preparation of Decision Files and ARs of agency decisions other than formal rulemaking[1] and administrative adjudication, such as matters before the Office of Hearings and Appeals. Agency personnel should promptly consult the Office of the Solicitor when questions arise concerning the composition of a Decision File and throughout the process of preparing an AR to ensure that they are properly compiled. This guidance establishes internal Department guidelines only.[2]

II. Importance of Compiling an Accurate and Thorough Decision File and AR

Under the Administrative Procedure Act ("APA"), a court reviews an agency's action (*e.g.*, any decision) to determine if it was "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706 (2)(A). In making this determination, a court evaluates the agency's complete AR. Consequently, the agency must take great care in compiling a complete AR. Courts will generally defer to agency decisions, although the degree of deference often varies. For example, if the Department made a thorough and informed decision, but documentation supporting the decision is not contained in the AR, any deference a court may have given to the agency decision could be lost or diminished.

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[1] Agency rulemaking proceedings primarily take two forms – formal and informal rulemaking. In general, formal rulemaking results when a statute specifically requires an agency to conduct a trial-like "on the record" hearing and provides interested parties an opportunity to testify and cross-examine adverse witnesses before issuing a particular rule. *See* Administrative Procedure Act ("APA"), 5 U.S.C. §§ 556-557. In contrast, informal or "notice and comment" rulemaking only requires an agency to perform certain notice-and-comment procedural requirements prior to issuing a rule. *See* APA, 5 U.S.C. § 553. For purposes of this guidance use of the term "rulemaking" will include only informal rulemaking unless otherwise specified.

[2] This document does not create any rights, substantive or procedural, that are enforceable at law by any party.

In general, an AR is a compilation of documents[3] that includes the decision-making documents, as well as relevant agency documents generated or received in the course of the decision-making process. The AR should document the process the agency used in reaching its final decision to demonstrate it followed the required procedures, as provided by statute, regulation, and any applicable agency policies, and must explain and rationally support the agency's decisions. Moreover, the AR must demonstrate that the agency considered opposing viewpoints, if any, and provide a thorough explanation as to why the preferred course of action was adopted.

For this and other reasons, it is important that all Bureaus and Offices maintain organized, accurate, and thorough Decision Files that document work on their decisions. A complete Decision File ensures that the decision-maker, typically the individual signing the decision document, has access to information sufficient to render a well-reasoned decision. An agency must also protect the public's interest in government documents, and preserve its own interests, including compliance with the Federal Records Act and related requirements. Finally, if an agency decision is challenged in court, a thorough Decision File will enable the agency to compile an AR sufficient to defend the decision.

The Decision File, and any subsequent AR presented to the court, should:

- Contain the complete "story" of the agency decision-making process, including options considered and rejected by the agency;
- Include important substantive information that was presented to, relied on, or reasonably available to the decision-maker;
- Establish that the agency complied with relevant statutory, regulatory, and agency requirements; and
- Demonstrate that the agency followed a reasoned decision-making process.

The Decision File should be compiled as documents are generated or received during the decision-making process, making it a contemporaneous record of the decision. This practice will also increase agency efficiency and performance should it become necessary to create an AR.

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[3] The general term for all agency documents is records, which are defined in 44 U.S.C. § 3301 as:

> all books, papers, maps, photographs, machine readable materials [*e.g.*, e-mails, videos, etc.], or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business.

To avoid confusing "records" with "administrative record" and the Department's general records management requirements, this guidance generally refers to individual records as "documents," except where otherwise appropriate.

III. Relation of Decision File or AR Compilation to Other Agency Record Management and Disclosure Requirements

The Department has multiple responsibilities for the maintenance and disclosure of federal records. For purposes of this guidance, these responsibilities fall into three general categories that often intersect: 1) records management,[4] which includes maintaining a Decision File; 2) the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552; and 3) AR compilation.

Documents contained in a Decision File and an AR are not necessarily identical to those that might be released in response to a FOIA request. Although some documents previously released to the public through FOIA may be relevant to the decision and should properly be included in a Decision File and an AR, all documents released in response to a FOIA request may not need to be included in a Decision File and an AR because they are not relevant to the decision or the decision-making process. Conversely, an agency may not be able to disclose all documents in a Decision File or an AR to the public, for example, because they may be covered by a protective order.

This guidance relates only to agency documents identified for inclusion in a Decision File and an AR. Questions concerning general records management, FOIA, and how these statutes and rules relate to an AR should be brought to the attention of the Office of the Solicitor.

PART B – CREATING A CONTEMPORANEOUS DECISION FILE

I. The Decision File

A Decision File is the contemporaneous record of the agency's decision-making process. Practically, the Decision File is a collection of documents maintained by a designated employee, generally the employee, the program manager, the project manager, or their staff who has access to relevant documents, that details the development of an agency decision. If the decision is subjected to judicial review, the Decision File will be used as the primary basis for compilation of the AR. Other terms often used by Bureaus and Offices to describe a Decision File include "case file," "action file," "agency file," "official file," or "issue file."

II. Guidelines For Use in Generating a Decision File

Bureaus and Offices have wide latitude to create and maintain Decision Files, but the following general guidelines should be followed:

- The Office of the Solicitor should be consulted throughout the process as necessary;

[4] Federal records management requirements are governed by 44 U.S.C. Chapter 29, which is administered by the National Archives and Records Administration.

- A Decision File should be created once consideration of a decision begins, which will vary based on the situation;
- All documents necessary to create a single organized source of information that records the agency decision and decision-making process should be collected;
- The Decision File should be kept in an accessible location and should be organized in a logical manner, such as chronologically or by topic, so that documents can be added to the Decision File as they are generated or received;
- All documents placed in the Decision File should be appropriately labeled and dated;
- Substantive meetings that are relevant to the decision-making process should be sufficiently documented;
- Drafts that help substantiate the agency's decision-making process should be included in the Decision File;
- Documentation of electronic information (such as that found on websites) and communications (such as emails) should be maintained in the Decision File only if relevant, substantive, and if they document the decision-making process;
- When information contained on websites is relied on, the Decision File should contain a contemporaneous copy of the website, including the address and date that it was downloaded, to ensure that the information relied on is preserved before the web site content changes;
- Contemporaneous memoranda that document relevant oral communications, confusing emails, and other matters that demonstrate the agency's decision-making process should be written or collected and placed in the Decision File; and
- Once the decision-maker has made a final decision, the Decision File should be closed.

PART C – COMPILING AN ADMINISTRATIVE RECORD

I. Sources To Consult Before Compiling an AR

The APA governs judicial review of challenged agency decisions but does not specifically describe what is to be included in an AR. Under certain circumstances, other

statutes and regulations provide specific guidance on compiling ARs. At the outset, the agency, in consultation with the Office of the Solicitor, must determine whether a statute other than the APA applies. Additionally, regulations and implementing guidance may govern how to assemble an AR. In such circumstances, this guidance should be used in conjunction with any specific statutes and regulations.

As a procedural matter, Bureaus or Offices should determine whether they will seek the logistical assistance of the Department's Document Management Unit, in the Office of the Executive Secretariat.

II. Documents That Should Initially Be Collected for an AR

During the initial search phase, a designated employee (the "AR Coordinator") should begin by examining the Decision File, if any, because most, if not all, of the documents that go into an AR should be in a properly maintained Decision File. The AR Coordinator should also direct an additional and thorough search in order to collect other relevant documents, including all primary and supporting documents, which may not be included in the Decision File. Such documents should include substantive documents:

- That were relied upon or considered by the agency, regardless of whether they support or oppose the agency's position;
- That were available to the decision-maker at the time the decision was made (i.e., considered by staff involved in the decision process as it proceeded through the agency), regardless of whether they were specifically reviewed by the decision-maker; and
- Even if the AR Coordinator believes the relevant documents are privileged.

Keep in mind that, while the APA does not specifically describe what is to be included in an AR, a court's review of a decision by an administrative agency is generally based on the reasons given by the agency and the information considered by the agency in the course of making the decision, not on the internal decision making process or on documents that reflect that process.

The AR Coordinator should maintain a written record detailing where he or she searched for documents and who was consulted in the process of compiling the AR. When questions about either the documents that should be included or the scope of any additional search arise, the AR Coordinator should consult with the Office of the Solicitor.

III. Steps To Take After Collecting Documents Related to the Challenged Decision

The AR Coordinator should contact the appropriate Office of the Solicitor reviewer after all documents have been gathered. The Office of the Solicitor will work with the Department of Justice and the AR Coordinator to determine the scope of the AR, such as

what types of documents that have been gathered are relevant to the particular issues in the litigation and should be included in the AR. In addition, the Office of the Solicitor will work with the Department of Justice to provide the AR Coordinator with any specific instructions for formatting, organizing, sorting, or providing the documents for review for assertion of privileges or for determination of relevancy.

The AR Coordinator should ensure that each document to be included in an AR is clean, legible, and complete, even if the document is believed to contain protected or privileged information. The AR Coordinator must ensure that the documents to be included in the AR have not been redacted, edited, or altered in any manner, unless such alterations are part of the original document.

IV. *Documents That Should Be Included in an AR*

After the documents have been collected, the AR Coordinator should begin to compile the AR. At this point, the AR Coordinator should consult with the Office of the Solicitor to determine if there is any additional guidance to be followed for the specific AR. Specific guidance may include particular issues that should be focused on or types of documents that should be flagged.

The following documents are typically included in an AR when they are relevant, without regard to whether they support or oppose the agency decision or whether the AR Coordinator believes they contain privileged information:

1) All *primary documents*. Primary documents record the agency action that is or may be challenged. They are typically signed or approved by a decision-maker, and commonly include National Environmental Policy Act ("NEPA") documents, such as Environmental Impact Statements or Environmental Assessments; Records of Decision; Endangered Species Act documents, such as a biological opinion; Resource Management Plans; and final rulemaking documents; and

2) All *relevant, supporting documents* that were followed, relied upon, or considered by the agency during the decision-making process. For purposes of this guidance, relevant documents are documents that bear a logical connection to the matter considered and that contain information related to the agency decision at issue. Documents are always relevant if they are procedurally required by statute or regulation as part of the decision-making process.

   Additionally, all supporting documents, which include those documents that affect the substance of the primary documents or the decision, are relevant because they explain the agency decision-making process, were before or available to the decision-maker at the time the decision was made, and were relied upon or considered by the agency during the decision-making process. They include documents that both support and are contrary to the agency decision.

Determinations of relevance may be complicated, affecting the content of the AR and the defense of the agency decision, and should be made in consultation with the Office of the Solicitor. The Office of the Solicitor will consult with the Department of Justice as appropriate. Examples of relevant, supporting documents include:

- Departmental, Office, and Bureau policies, guidelines, directives and manuals;
- Documents contained in previous ARs that were relied upon or considered in the decision-making process (even if not being challenged by the current litigation);
- Documents that have been released to the public, such as through a FOIA request, or are available to the public, including on the Internet;
- Communications and other information received from the public and other agencies and any responses to those communications. These communications can be unsolicited, the result of informal communications (such as between agencies), or part of a formal process such as comments received during NEPA public scoping or during rulemaking. If a consultant or contractor received or compiled public or agency comments, those comments and any reports or summaries should also be included in the AR;
- Articles, books and other publications. If a copy is made, be sure to cite the appropriate sources and follow applicable copyright laws;
- Technical information, monitoring data, sampling results, survey information, engineering reports or studies, and other factual information or data;
- Documents cited as a reference of a primary document, such as a bibliography of an Environmental Impact Statement;
- Reports and other information compiled by consultants and contractors;
- Memoranda to the file, created contemporaneously to the creation of the document, that further explain the content of relevant electronic communications and their attachments, meetings, and phone conversations;
- Electronic communications or other internal communications, such as emails and their attachments, which contain factual information, substantive analysis or discussion, or that document the decision-making process. (See section C.VI for detailed discussions of electronic communications);
- Minutes, transcripts of meetings, and other memorializations of telephone conversations and meetings, including personal memoranda or handwritten

notes that were circulated to colleagues or added to the Decision File. (See section C.VII for detailed discussions of personal memorializations); and

- Drafts of primary or relevant documents indicating substantive deliberations or discussions. (See section C.VIII for a detailed discussion of drafts).

When questions arise about which documents to include, the AR Coordinator should initially include the documents in the AR and then consult with the Office of the Solicitor. In addition, some documents, such as books and published reports, may be particularly lengthy, making them difficult to copy. When a document is particularly large, the Office of the Solicitor should be contacted for instructions on how to proceed. The Office of the Solicitor may be able to work with the Department of Justice and opposing counsel to come to a mutually acceptable agreement concerning how such documents will be produced.

V. Types of Documents That Should Not Be Included in an AR

The following types of documents, although they may be appropriate for inclusion in the Decision File, typically should not be included in the AR:

- Documents that are not relevant to the decision-making process;
- Documents that were not in the agency's possession at the time the decision was made;
- Electronic communications, including emails, which do not contain factual information, a substantive analysis or discussion, or information documenting the agency decision-making process. (See section C.VI for detailed discussions of electronic communications);
- Personal notes, journals, appointment calendars or memorializations maintained by an individual solely for personal use and not circulated to colleagues or added to the agency file. (See section C.VII for detailed discussions of personal memorializations); and
- Drafts of documents that simply agree with previous drafts or represent mere grammatical edits and do not contain significant additional substantive comments. (See section C.VIII for a detailed discussion of drafts).

When questions arise about the documents to be included, the AR Coordinator should initially include the documents in the AR and consult with the Office of the Solicitor.

VI. Electronic Communications

General Guidelines for Electronic Communications: Only electronic information and electronic communications, such as emails, that contain relevant factual information, a

substantive analysis or discussion that formed a material part of the decision-making process, or that actually document the agency decision-making process should be included in the AR. As a general rule of thumb, the great majority of email "chatter" about a decision need not be included in the AR. For example, emails should be included in the AR if they propose or discuss substantive changes to a draft primary document, or if they document substantive supervisory instructions to staff relating to the decision-making process. Such emails that are exchanged between the agency decision-maker, other agencies, stakeholders or representatives from outside parties should also generally be included if they substantively document the decision process. On the other hand, emails that merely set up a meeting or transmit an attached document, or that do not contain substantive relevant information generally do not need to be included in the AR.

The AR Coordinator should ensure that information related to the decision-making process is included in the AR in a manner that is clear and easy for a reviewer unfamiliar with the process to understand. For example, when included in the AR emails must include attachments and identifying information, such as author, recipient and date. In addition, while duplicate copies of emails should typically not be included in an AR, if a duplicate helps to explain the context of a related email, it should be included. Additionally, the AR Coordinator should ensure that the AR includes any memoranda that were inserted into the Decision File prior to the decision to clarify unclear or confusing emails. The AR Coordinator should consult with the Office of the Solicitor to determine if a particular email should be included in the AR.

Personal information: While emails that contain a commingling of personal and official information generally need not be included in the AR, such communications may need to be included in an AR without redaction if the official information substantiates the decision-making process.

Confusing chain messages: Ideally, employees should use care in drafting and sending emails to avoid later confusion in interpreting the chain of communication. Emails with numerous attachments or that contain a commingling of personal and agency information and email chains with multiple parties and topics can lead to confusion and misinterpretation of the intended communication, especially when a long period of time has passed and the reader is less familiar with the subject matter. It may be difficult for an outside party, such as a court, to determine the actual context of an email or portion of an email without relevant attachments or all the emails in a chain. When several separate responses are sent in reply to one original message, the original message should remain attached to each of the responses.

VII. Personal Memorializations

In general, documents that were created solely for an employee's personal convenience, even if they help that employee perform his or her official duties, should not be included in the AR. As a result, diaries, journals, "to-do" lists, personal notes and personal calendars that were created for the author's personal use and that were not distributed to other employees typically should not be included in the AR. However, documents that an

employee was required to create or maintain or that were distributed to or relied on by colleagues and/or the decision-maker and contain information related to the decision-making process should typically be included in an AR. If an employee takes relevant handwritten notes at a meeting and later gives copies of his or her notes to colleagues who were unable to attend the meeting, the notes should be included in an AR if there is no other documentation of the meeting.

However, in those situations where a personal memorialization is the only evidence that a relevant meeting occurred or contains substantive evidence relevant to the decision-making process, it may be necessary to include a personal memoralization in an AR. The AR Coordinator should consult with the Office of the Solicitor to determine if a personal memorialization should be included in a specific AR.

VIII. Draft Documents

Only drafts that help substantiate and evidence the decision-making process should be included in the AR. Drafts of documents that simply agree with previous drafts or represent primarily grammatical edits or were not circulated outside the author's immediate office or working group typically should not be included in an AR. For example, drafts may contain unique information such as an explanation of a substantive change in the text of an earlier draft, or substantive notes that represent suggestions or analysis tracing the decision making process.

The AR Coordinator should ensure that all drafts are labeled with identifying information, including the date and author or editor of the draft who made suggestions. When changes or suggestions are made to only one section of a large draft, the AR Coordinator may include just those sections in the AR, provided that the context is clear and that identifying information is included, such as the version of the draft reviewed, the date, and the name of the employee making the changes or suggestions.

IX. Preparing Documents for Office of the Solicitor Review

The AR Coordinator should notify the Office of the Solicitor upon completion of preliminary sorting and organizing of the documents found in the Decision File or the initial search and creation of a draft AR. The AR Coordinator should request any further instructions regarding formatting, organizing, sorting, or providing the documents prior to review. Unless requested by the Office of the Solicitor, the AR Coordinator should not simply provide the Office of the Solicitor the Decision File or all the documents collected after the initial search for documents. When the AR Coordinator provides the draft AR to the reviewing attorney, every document should be complete, regardless of whether the AR Coordinator believes it contains privileged or protected information.

X. Office of the Solicitor Review

The Office of the Solicitor will review the documents in the draft AR for relevancy and completeness and review and mark documents that contain protected or privileged information.

Completeness and Relevance: The Office of the Solicitor reviews the AR for completeness and provides advice to the AR Coordinator regarding any documents identified as questionable for relevance. While this review does not necessarily include a thorough examination of each document, the review should generally check for obvious logical deficiencies by evaluating whether the AR, as presented, adequately and accurately demonstrates the agency decision-making process. The Office of the Solicitor may review the steps taken by the AR Coordinator in compiling the AR to ensure that all primary and relevant supporting documents have been included.

Protected Information: The Office of the Solicitor will review the documents to determine if they contain specific information that the agency is prohibited from disclosing to non-federal parties, such as by court order, statute (e.g., the Privacy Act), or regulation. Disclosure of such information to any party, other than in accordance with specified procedures, could lead to lawsuits, penalties, or sanctions. The Office of the Solicitor will work with the Department of Justice to determine whether the protected information may be disclosed under seal or other protective order.

Privileged Information: The Office of the Solicitor will review the documents to ensure that any privileged information the agency wants to withhold is removed or redacted and adequately documented. Privileges attach to information under law to protect them from discovery. An agency generally cannot claim that information is privileged if the information has been lawfully released to a non-federal party in the past, perhaps in response to a FOIA request. Unlike protected information, privileged information may be disclosed at the agency's discretion. However, disclosure of privileged information forever waives the privileges in that information.

Relevant privileges that may be asserted by the Office of the Solicitor and the Department of Justice include: the attorney-client privilege, the attorney work product privilege, the confidential business information or trade secret privilege, the deliberative process privilege, and the executive and governmental privileges.

Due to the number of legal issues involved in asserting privileges, it is particularly important for the AR Coordinator and the Office of the Solicitor, in consultation with the Department of Justice, to work closely on any issues that involve privileged information.

XI. Office of the Solicitor Actions After Review

The Office of the Solicitor will recommend additions, removals, or redactions of documents from the AR as a result of the review described in section C.X. A privilege index will be created to describe the protected and privileged documents. (See section

C.XIV for a detailed discussion of the privilege index). The protected and privileged documents shall be stored separately from the non-protected and non-privileged documents. The Office of the Solicitor may keep the protected and privileged documents while the non-protected and non-privileged documents will be returned to the AR Coordinator.

XII. Organization of the AR

The AR should be organized in a logical and accessible way so that someone unfamiliar with the issue can find specific documents quickly. Documents in an AR can be compiled by chronological order, topic, or by agency in a multi-agency decision. Similarly, ARs may be divided into several topics, perhaps based on the topics of various primary documents at issue, and chronologically organized within each topic. This technique is particularly common if several agency actions are contested. Other logical organizations of ARs are permitted.

The AR Coordinator should be aware that there might also be organizational requirements created by court rules or accommodation of requests by the opposing party. The AR Coordinator should work closely with the Office of the Solicitor for instructions before determining the best method for organizing an AR.

XIII. Numbering of Documents in the AR

Each document in the AR should be assigned a unique number so that it may be uniformly referred to by the parties. All documents, including those that contain protected or privileged information, should be numbered using the same system. For ease of reference, documents may be tabbed or provisionally numbered, but the documents should never be permanently marked, numbered or altered in any way prior to completion and review of the index. Final, permanent document numbers should not be assigned until after the AR index is complete and has been reviewed by the Office of the Solicitor. In addition to assigning each document a unique number, every page of the AR should be numbered in such a way to allow the page numbers of particular documents to be identified and cited in a brief to the court, such as AR [document number], [page number]; AR [Volume number], [page number]; or AR [page number].

In some cases, Bates stamping or a similar electronic process can be used to individually number every page. Alternately, multi-paged documents with internal pagination may only need unique document numbers. Numbering typically should be done so that the documents and pages begin with the smallest numbers and end with the largest number. Please consult with the Office of the Solicitor to determine the best numbering technique.

XIV. Preparation of an AR Index and a Privilege Index

After the AR has been organized, the AR Coordinator should create both a complete AR index and a privilege index. Typically, an AR index is in chart form and includes the following categories of information: the unique document number; a brief (one- or two-

sentence) description of the document's nature and topic; date; identification of sender and recipient; number of pages; nature of any privilege or protection to be asserted. (See Appendix 1 for a sample AR index.)

In addition to the AR index, a separate privilege index must be generated if the agency is withholding any protected or privileged information. A privilege index (also referred to as a privilege "log") should include only those documents where a privilege or protection is being asserted. The content of a privilege index is similar to the content of an AR index, and includes an explanation of the privilege asserted. Once complete, a copy of the privilege index should be physically kept with the privileged and protected documents. (See Appendix 2 for a sample privilege index.) The AR Coordinator should not include any of the underlying privileged information in the AR index or the privilege index.

Prior to filing the AR index and privilege index with the court and releasing them to opposing parties, the AR Coordinator should consult with the Office of the Solicitor for specific requirements or instructions.

XV. Certification of AR to the Court

The AR must be certified to the court by the AR Coordinator, or in rare cases, another federal employee who is familiar with the manner in which the AR has been compiled. The certification is signed under penalty of perjury, and the AR Coordinator should work closely with the Office of the Solicitor to develop appropriate language. The certificate typically explains that the AR Coordinator was responsible for compiling the AR, has personal knowledge of its assembly, and states that the AR is full and complete. The certification also may describe the AR, such as the number of documents or the number of privileged or protected documents, or it may clarify that certain categories of documents are not included in the AR (such as transmittal memoranda, fax cover sheets, privileged and protected documents, internal working drafts, voluminous publicly available scientific reports, copyright protected books, etc.) In unique cases where the decision being challenged is not final, a clause may be inserted explaining that the agency expects to generate additional documents on the challenged issue. The certification is often sworn and notarized or in the form of a declaration with a Departmental and/or Bureau or Office seal. (See Appendix 3 for a sample certification.)

XVI. Filing the AR with the Court

Different courts have different rules for filing an AR. The Office of the Solicitor will work with the Department of Justice, the court, and the opposing party and will provide specific filing instructions to the AR Coordinator.

All-American Canal Lining Project
Administrative Record
DOCUMENT INDEX
(Volumes 1-4)

Date	Document	Vol.	Tab No.	Page No.	Filename on CD
	NATIONAL ENVIRONMENTAL POLICY ACT DOCUMENTS				
07/29/1994	Record of Decision of May 1994 for the Final Environmental Impact Statement/Final Environmental Impact Report (FEIS/FEIR) on the All-American Canal (AAC) Lining Project, attached to letter of transmittal from Regional Director, Lower Colorado Region, Bureau of Reclamation (LC Region)	1	1	1	0001
March 1994	FEIS/FEIR on the AAC Lining Project, issued by Reclamation and Imperial Irrigation District	1	2	23	0002
March 1994	Engineering Appendix to the FEIS/FEIR	1	3	321	0002-01
March 1994	Environmental Appendix to the FEIS/FEIR	2	4	455	0002-02
March 1994	Geohydrology Appendix to the FEIS/FEIR	3	5	936	0002-03
March 1994	Public Involvement Appendix to the FEIS/FEIR	3	6	1269	0002-04
March 1994	Social Appendix to the FEIS/FEIR	4	7	1481	0002-05
11/22/1999	Memorandum to Yuma Area Office Manager, Reclamation, from Regional Director, LC Region, regarding reexamination and analysis of the 1994 FEIS/FEIR and Record of Decision for the AAC Lining Project	4	8	1574	0003
05/19/2003	Letter to Director, California Department of Water Resources, from Regional Director, LC Region, regarding adequacy of the 1994 FEIS/FEIR and Record of Decision for the AAC Lining Project (Project) and Finding of Ecological Equivalency	4	9	1588	0004
	ENDANGERED SPECIES ACT DOCUMENTS				
01/25/2005	Letter to Field Supervisor, Fish and Wildlife Service (FWS), Carlsbad, California, from Regional Director, LC Region, regarding request for confirmation of Conference Opinion (1-6-96-F-12) as a Biological Opinion for Peirson's milk vetch for the AAC Lining Project	4	10	1591	0005
11/15/2004	Memorandum to Regional Director, LC Region, from Assistant Field Supervisor, FWS, Carlsbad California, regarding LC Region's request for confirmation of Conference Opinion as a Biological Opinion for Peirson's milk vetch for the AAC Lining Project	4	11	1593	0006
09/9/2004	Letter to Field Supervisor, FWS, Carlsbad, California, from Deputy Regional Director, LC Region, requesting confirmation of Conference Opinion (1-6-96-F-12) as a Biological Opinion for Peirson's milk vetch for the AAC Lining Project	4	12	1596	0007
02/08/1996	Memorandum to Environmental Compliance Group Manager, LC Region, from Ecological Services Field Supervisor, FWS, Carlsbad, California regarding the Biological and Conference Opinion for the AAC Lining Project	4	13	1612	0008
September 1993	Final Fish and Wildlife Coordination Act Report, AAC Lining Project, Imperial County, California	4	14	1636	0009

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Appendix 1

All-American Canal Lining Project
Administrative Record
DOCUMENT INDEX
(Volumes 1-4)

Date	Document	Vol.	Tab No.	Page No.	Filename on CD
	SECRETARIAL CORRESPONDENCE				
9/13/2005	Letter to Secretary of Environment and Natural Resources of Mexico from Secretary of the Interior regarding lining of the AAC	4	15	1709	0010
11/19/2004	Letter to Secretary of Environment and Natural Resources of Mexico, from Secretary of the Interior regarding lining of the AAC	4	16	1712	0011
	INTERNATIONAL BOUNDARY AND WATER COMMISSION CORRESPONDENCE				
09/20/2004	Letter to Commissioner of Reclamation from Commissioner of the U.S. Section of the International Boundary and Water Commission (USIBWC) regarding status of consultation with Mexico	4	17	1724	0012
02/24/1992	Letter to Commissioner of USIBWC from Commissioner of Reclamation responding to letter summarizing Mexican consultation over AAC Lining	4	18	1726	0013
02/22/1989	Letter to Regional Director, LC Region, from Commissioner of USIBWC regarding USIBWC's position on seepage from the AAC	4	20	1728	0014
08/12/1986	Letter to Regional Director, LC Region, from Acting Commissioner of USIBWC responding to Reclamation's request for views on recovery of AAC seepage	4	21	1730	0015

Acronyms and Abbreviations	
AAC	All-American Canal
FEIS/FEIR	Final Environmental Impact Statement/Final Environmental Impact Report
FWS	Fish & Wildlife Service
LC Region	Bureau of Reclamation's Lower Colorado Regional Office
Reclamation	Bureau of Reclamation
USIBWC	United States Section of the International Boundary & Water Commission

For Your Info.

Page 2 of 2

All-American Canal Lining Project Administrative Record
DOCUMENT INDEX

Date	Document
	PRIVILEGED DOCUMENT LOG
6/24/1999	Fax to LC Regional Director from YAO Area Manager transmitting the comments of the DOI Solicitor's Office, which were requested by Reclamation on the AAC memorandum regarding Reexamination and Analysis of the 1994 FEIS/EIR and ROD for the AAC Lining Project
4/23/1999	Memorandum to DOI Solicitor's Office from YAO Area Manager requesting Solicitor's Office legal opinion regarding the Environmental Impact Statement and Record of Decision for the AAC Lining Project
4/21/1999	Email from LC Regional biologist transmitting comments on a draft memorandum that requests the legal advice of the DOI Solicitor's Office regarding AAC Lining Project
4/9/1993	Response from DOI Solicitor's Office to LC Regional Director's request for a basis of negotiation regarding the AAC Lining Project

For Your Info.

Appendix 2

Page 1 of 1

United States of America

DEPARTMENT OF THE INTERIOR
Washington, D.C.

I certify that the official records of the Department of the Interior identified below are in my legal custody and attest that each annexed paper is a true copy of a document comprising part of the official records of the Department of the Interior:

- Administrative Record, as reflected in the attached index, supporting the [Department, Bureau, or Office]'s [Date] Record of Decision for the [Decision Being Litigiated]. The Administrative Record does not contain fax cover sheets, privileged and protected documents, or voluminous publicly available scientific reports.
- Additional documents related to Plaintiffs' claims in this litigation.
- The [Department, Bureau, or Office] is presently implementing the [Date] Record of Decision for the [Decision Being Litigated] and anticipates generating additional documents with respect to such implementation before [Relevant Action] begins.

IN TESTIMONY WHEREOF, I swear under penalty of perjury that the foregoing is true and correct. Signed this ___ day of [Month, Year].

SIGNATURE: _____

TITLE: _____

OFFICE: _____

APPROPRIATE SEAL

For Your Info.

Appendix 3

K.3 ADMINISTRATIVE RECORD CONTENTS

K.3.a PIFS Should Receive:

Advanced Acquisition Plan – Copy, *Original in Contracts*
Advisory Council Correspondence
Agency Correspondence
Agreement Documents
All incoming and outgoing project related correspondence, including e-mails
Approval Memorandum
Assessment of Effect Form
Briefing Sheets
Capital Asset Plan and Quarterly Updates
Capital Asset Plan Approval
Categorical Exclusion (Compliance)
Certified Mail Receipt (Green Card)
Choosing by Advantages Analysis
Constructability Checklist
Construction Management Task Order
Construction Progress Meeting Minutes
Cost Estimates
DAB Approval memo for Projects over $500,000
DAB Project Package
Decisional Correspondence
Design Development Documentation
Determination of No Adverse Effect
Director's Approval - Original
Draft Environmental Assessment
Draft Environmental Impact Statement and Review Comments
Endangered Species Information
Federal Highway Contract Documentation
Federal Register Notice
Final Inspection - *Copy*
Final Specifications/Project Manual
Fund Availability Form - Copy
Funding Advices *[from WASO or Park to obligate funds FHWA & GMP]*
Funding Authorization [*email*]
Funding Requests to WASO
Inspection Report
Interdisciplinary Review Checklist
Internal Review Comments
Internal Review Comments
Letter of Substantial Completion - *Copy*
Memorandum Documenting Steps Taken to Avoid Adverse Effects
Memorandum Identifying Consulting Parties
Memorandum of Concurrence with Determination of No Adverse Effect
Memorandum of Notification of Understanding with Potential to Cause Effects to Historic Properties
Memorandum to File – NEPA Compliance
Memorandum to Files Documenting 106 Compliance Covered by Previous Project
Memorandum to Files Documenting No Cause of Effect to Historic Properties
Memorandum to Files Documenting no Undertaking
Modifications
National Register Nomination Forms
National Register Nominations
Newsletter Mailing List
News Release
Notice of Availability – *Published in FR*
Notice of Intent – *Published in* (FR)
Notification of Adverse Effect – *Published in FR*
Notification to Public of Adverse Effect
Operational Preview Meeting Minutes, Comments
Operational Review
Original Public Comments and Summaries
Original Signed Project Program Summary
Outcome of DAB Presentation
Permits
PMIS Project Report
PMIS Project Statement – C Version
Pre Design Documentation
Presentation Materials – Oversize Flip Charts Transcribed onto Standard
Press Release
Press Release for Environmental Assessment
Program Review Including Periodic Budget Snapshots
Project Agreement also Drafts
Project Analysis
Project Program Plan
Project Program Template
Project Review
Project Status
Public Meeting Minutes
Punch List Completion - *Copy*
Quantity Takeoffs
Record of Approval to Print
Regional Fund Clearance Form
Request for Proposal – Copy
Research Data
Review Comments from parks, regions & team members
Roundtable minutes
Scope of Services
Secretary of the Interior Approval - Copy

SHPO Correspondence
Signed Constructability Checklist
Size Paper
Solicitation Amendments
Spending Plan
Task Directive
Team Meeting Minutes
Technical Analysis Comments
Telephone Log
Tribal Correspondence
Trip Reports
Vegetation
WASO Comments or Round Table Minutes
Weekly Field Reports
Wetlands
Workloads
Work Session Books or Briefings
Workshop Document

K.3.b TIC Should Receive:

Analysis
Archeological Assessment
Archeological Monitoring Reports
As-Built Drawings
Assessment of Effect
AutoCAD CDs
Biological Assessment
Boundary Survey
Building System Analysis
Changes
Climbing Management Plans
Completion Report
Constructability Analysis
Cultural Landscape Assessment/Inventories
DAB 5-Year Plan [Congressional Version Only or Green Book Only]
Design Analysis
Design Calculations
Electronic Drawings
Electronic Specifications/Final Specifications / Final Project Manual/Exhibit Specifications
Environmental Assessment
Environmental Assessment – Including All
Ethnographic Assessment
Feasibility Study
Final Environmental Impact Statement
Finding of No Significant Impact
Floodplain Assessment
Geological Assessment
Hazardous Materials Report
Historic Resource Study
Historic Structure Assessment
History Studies
Hydrologic Report
Interpretive Plans
List of Classified Structures
Material Sampling Report
Modifications to Drawings – Sheet Changes, Cover Sheet and Index
Mylar Original Construction Drawings - received from Contracts*
Newsletter
Operation, Maintenance and Training Manual
Post Occupancy Evaluation
Pre Design Summary Document
Preferred Alternative
Presentation Plan (Executive Summary of GMP)
Project Photographs
Publishing Materials, Camera Ready, Dummy Negatives, Electronic Files, Public Review
Record of Decision
Salvage Inventory Plan
Schematic Design
Seismic Study
Site Photos
Soils Report
Special Resource Studies
Statement of Findings
Statement of Findings
Structural Assessment
Topo Survey
Topographic Data Information
Utility Drawings
Value Analysis
Wild & Scenic River Studies
Wilderness Studies
Workshops Report

K.3.c Contracts Should Receive:

A/E Performance Evaluation – SF-1421
Advanced Procurement Plan
Acceptance and Rejection Memorandum
Accident Reports
All Incoming & Outgoing Construction Related Correspondence, including e-mails
Approved Safety Plan
Award Documents
Beneficial Occupancy Inspection
Bid Package
Bid Schedule
Blasting Safety Plan
Capability Criteria and Evaluation Plan

CD Package
Certificate of Fund Availability – Original
Completion Reports
Construction Management Firm Mobilization Memorandum
Construction Management Performance Evaluation
Construction Management Task Order
Construction Mgt. Firm Employee Memorandum
Construction Performance Evaluation Form
Construction Progress Meeting Minutes
Contract Modification
Contracting Officer's Directive Letter
Contractor Evaluation
Contractor Quality Control - Daily Diaries
Construction Closeout documents
COR Appointment Letter
Cost Estimate
Cure Notices
Daily Field Reports
Davis Bacon Wage Rate Request
Design Deficiencies
Director's Approval – Copy
Final Inspection - Original
Final Payment Memorandum
Fund Certification and COR Letter
Indefinite Quantity Contract
Inspection and Acceptance Memorandum
Insurance Reports or Certification or Proofs
Interagency Agreements
Invoices
Irregularities in Bids
Labor Violations
Lack of Progress Letter
Latent and Patent Defects
Letter of Acceptance
Letter of Decision
Letter of Substantial Completion - Original
Meeting Minutes
Miller Act Response
Modifications
Monitoring Costs, Budget and Contract Administration Memorandum &
Mylar Original Construction Drawings for eventual routing and filing in TIC
Negotiations: include Request for Proposal, Government Estimate, A/E Proposal, Comparative Analysis, Technical Review, Discussion of Hours & Costs Memo, Solicitor's Review, etc.
Notice to Proceed
Notification of Termination
Operational Preview Mtg. Minutes & Comments
Operational Review
Original Advance Acquisition Plan
Original Pay Estimates
Partnering Meeting Minutes
Payments, including Pay Estimates, Performance Evaluation, etc.
Payrolls
Performance and Payment Bonds Checklist
Planning Cost Estimates
Post Award: Not-to Exceed
Post Occupancy Evaluation
Pre-Award Documents
Pre-Construction Conference Meeting Minutes
Pre-Negotiation Position
Price Memorandum
Price Negotiation Memorandum
Progress Payment Memorandum
Progress Schedules
Project Analysis
Project Estimates
Punch List
Punch List Completion - Original
Purchase Request
Quality Control Plan
Rejection of Work Letter
Release of Claims
Release of Claims Memorandum: Reports
Request for Information
Request for Price Proposal
Request for Proposal
Requisitions
Scope of Services
Scoring and Ranking Sheets
Secretary of the Interior Approval – Original
SF-1886 for Small Business
Shop Drawing Transmittals (At Project Completion)
Site Visit Inspection Report
Solicitation Amendments
Source Solicitation Decisions
Submittals Letter
Surety Bond
Task Order documents
Task Order Closeout
Technical Evaluation Panel Memorandum (TIC*)
Utility Correspondence & Related Contract Actions
Value Engineering Change Proposal
Warranty of Construction

K.4 EXAMPLE OF A ROD FOR A GMP/EIS

National Park Service
U.S. Department of the Interior

Wupatki National Monument
Arizona

General Management Plan

Record of Decision

Approved:

_____

Michael D. Snyder
Intermountain Regional Director
National Park Service

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

RECORD OF DECISION

GENERAL MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT

Wupatki National Monument

Arizona

[Instructions/suggestions are highlighted and in brackets, delete from final product. *The average ROD should be 10 pages. If the preferred alternative proposes actions that would be located in or have adverse effects on floodplains/wetlands, a wetland/floodplain statement of findings (SOF) must be combined with draft/final EIS. When signed by the regional director, the SOF is attached to the ROD as a separately identifiable document. If the preferred alternative affects a historic property eligible for listing on or listed on the National Register of Historic Places, then the information gathered as a part of the section 106 review must be included in the draft/final EIS and the section 106 process must be completed before the ROD can be signed. The ROD must include a statement on consultation under section 106. All consultation under section 7 of the Endangered Species Act must be completed before the ROD can be signed.]*

The Department of the Interior, National Park Service, has prepared this Record of Decision on the *General Management Plan/Final Environmental Statement* for Wupatki National Monument. This Record of Decision includes a description of the background of the project, a statement of the decision made, synopses of other alternatives considered, the basis for the decision, findings on impairment of park resources and values, a description of the environmentally preferable alternative, a listing of measures to minimize environmental harm, and an overview of public and agency involvement in the decision-making process.

BACKGROUND OF THE PROJECT

The purpose of the general management plan is to provide a comprehensive direction for resource preservation and visitor use and a basic foundation for decision making for the monument for the next 15 to 20 years. The plan prescribes the resource conditions and visitor experiences that are to be achieved and maintained in the park over time. The clarification of what must be achieved according to law and policy is based on review of the park's purpose, significance, and special mandates.

DECISION (SELECTED ACTION)

Description of the Selected Action

[Describe the Preferred Alternative]

Key Actions

[If you need to, show bullet list of key provisions of the Preferred Alternative.]

Boundary Expansion

[For some GMPs, this is an important step, so it can be broken out, if you'd like.]

Mitigating Measures/Monitoring

[Make a clear statement of which mitigation measures will be implemented if they are not obviously integral to the alternative selected and summarize any monitoring or other enforcement programs or plans. The description of mitigation and monitoring should be specific enough to enable the public to determine whether measures have been effectively implemented, but not be so specific as to duplicate the EIS (DO-12, 6.2A4).]

OTHER ALTERNATIVES CONSIDERED

[Describe the other alternatives that were considered in the final EIS.]

BASIS FOR DECISION

[Describe the decision rationale—what were the criteria (e.g. cost, degree of environmental impact, technical considerations, degree to which objectives were met, logistics) used in selecting an alternative, how did each alternative measure up against these criteria, how were the criteria weighted, and so forth (DO-12, 6.2A3).]

FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES

[ROD must indicate that, after a review of the impacts, the alternative selected for implementation will not impair park resources or values and will not violate the NPS Organic Act.]

[Summarize the impact analysis, paying particular attention to any major adverse effects, because impairment is a subset of those effects.]

ENVIRONMENTALLY PREFERRED ALTERNATIVE

[Using the six criteria spelled out in NEPA section 101, describe the environmentally preferred alternative. You may wish to use something like the following:]

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that "the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA §101: (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations; (2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings; (3) attain the widest range of beneficial uses of the environment without degradations, risk to health or safety, or other undesirable and unintended consequences; (4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety, of individual choice; (5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources."

The No-Action Alternative represents the current management direction for Wupatki National Monument. The existing use and development of the park is based on planning initiated and implemented during the Mission 66 program. Personal services interpretation and resource

protection patrols are sporadic at each of the four archeological interpretive areas, and the majority of visitors interact with these sites on their own with no on-site NPS presence. For resource protection purposes, areas of the park other than the developed sites and administrative areas are closed to unguided entry. Because the No-Action Alternative maintains the Mission 66 designed visitor experience, the diversity for educational opportunities and the protection of cultural resources is limited. Protection of cultural resources and visitor opportunities would not be as enhanced as under Alternatives 1, 2, 3, or 4. The No-Action Alternative does not impact access to neighboring lands, unlike Alternatives 2 and 4. The No-Action Alternative does not fully realize provisions 3, 4, 5, and 6 of the goals.

Alternative 1 strives to limit motorized sightseeing in the park and focus on longer and more intensive educational programs to enhance the protection of cultural and natural resources, thus meeting national environmental policy goal 6. This alternative restricts the visitor experience by eliminating the drive-through experience in favor of a longer intensive stay. This alternative also limits access by park neighbors to the Navajo Reservation, ranch land, and USFS lands surrounding the monument. National environmental policy goals 3, 4, and 5 are not fully realized under this alternative to the same extent as in Alternative 4. In addition, it does not fully realize provisions 3 and 5 of the goals when compared with Alternatives 2 and 3.

Alternative 2 promotes improved vehicle access to more of the park for diverse motorized sightseeing experiences and ensures presence of park personnel at popular use areas for visitor contact and site protection purposes. Motorized access to existing popular features would be maintained, and sightseeing would be expanded to new areas. The road to Black Falls Crossing would be opened to park visitors, and existing primitive roads in the north boundary expansion would be used for guided tours along a scenic backcountry loop. Opening the Black Falls Crossing Road to motorized sightseeing could cause congestion for Navajo residents that use the road to commute to Flagstaff and could cause congestion for other American Indians seeking traditional cultural uses in that area. Alternative 2 meets national environmental policy goals 3 and 5 by providing access to more of the park's resources. It does not meet the national environmental policy goal 4 for those groups traditionally associated with the park.

The Preferred Alternative provides for the greatest range of diverse visitor experiences and access to Wupatki National Monument. This alternative would improve upon existing visitor educational opportunities at popular use areas and provide guided access into undeveloped areas of the park. The traffic circulation pattern would remain the same and access to neighboring lands would remain unchanged. Areas of the park not zoned for administrative or visitor use would remain closed to protect resources. The four archeological areas of the park would be gated at night for protection. There may be some increased congestion for American Indians seeking traditional cultural uses from expanded visitor opportunities. The Preferred Alternative would realize each of the applicable provisions of the national environmental policy goals.

Alternative 4 restructures the way visitors gain access to and experience both Wupatki and Sunset Crater Volcano National Monuments to provide a more unified interpretive story and greater protection for natural and cultural resources. FR545 would be modified to a one-way exit road from the existing Wupatki visitor center to the north entrance of the Wupatki. The road would be gated at the beginning of the one-way and closed at night, impacting ranch and Navajo residents who use the road to commute to Flagstaff. Visitor opportunities would decrease with the removal of the visitor center/museum; however, extended learning would still be provided at each of the day use sites. Most of the existing housing, maintenance, and administrative facilities would be removed and the area would be rehabilitated to more closely resemble its historical appearance. Although Alternative 4 would realize most of the applicable

provisions of the national environmental policy goals, it would fall short of satisfying criterion 5 by precluding access through the park by park neighbors to the Navajo Reservation, ranch land, and USFS lands surrounding the monument.

The Preferred Alternative is also the environmentally preferred alternative. The Preferred Alternative surpasses the other alternatives in best realizing the full range of national environmental policy goals as stated in §101 of the National Environmental Policy Act. Although other alternatives may achieve greater levels of individual protection for cultural resources or natural resources, or better enhance visitor experience, Alternative 3 overall does (1) provide a high level of protection of natural and cultural resources while concurrently attaining the widest range of neutral and beneficial uses of the environment without degradation; (2) maintain an environment that supports diversity and variety of individual choice; (3) integrate resource protection with an appropriate range of visitor uses; and (4) accommodate the access needs of park neighbors and affiliated American Indian Tribes.

PUBLIC AND AGENCY INVOLVEMENT

[You may wish to break your responses down with the following subheadings, but it is not required. We've provided an example below.]

Scoping

The notice of intent (NOI) to prepare this EIS was published in the *Federal Register* May 19, 1997. The NOI indicated availability of newsletter #1, from which comments were accepted until June 30, 1997. The first newsletter described purpose and significance statements for the park, as well as identifying preliminary issues. A second newsletter, released February 1998, detailed public response to the first newsletter, described final purpose and significance statements, and explained the preliminary range of management zones. A third newsletter, issued November 1998, described the range of preliminary alternatives. The fourth newsletter in May 1999 described the decision to prepare a plan concurrently with the Forest Service Flagstaff Lake Mary Ecosystem Area planning process. All comments received through June 1999 were considered in the EIS. The *Purpose of and Need for the Plan, Need for the GMP*, and *Description of Scoping Process* sections of the FEIS describe the issues and concerns raised and sort the responses into several categories.

Public Meetings and Outreach

In addition to the newsletters, an open house was held August 20, 1997 to gain information from the public on the park's purpose and significance, issues, and alternatives. To determine if existing park visitors' needs were being met, trip fact sheets were set out at the visitor center. Visitors filled out the sheets voluntarily. The trip fact sheets were a one-page check-off that asked visitors where they were from, why they came to the park, how they preferred to learn about the park, and what they would take advantage of, if it were available. A total of 4,091 trip sheets, spanning a 15-month time frame, were collected and collated.

As a complement to the public meeting, newsletters, and trip fact sheets, a visitor use study was conducted to gather more in-depth information on visitors, their experience, behavior, and how behavior affects resources. Approximately 1,200 mail-back questionnaires were distributed in conjunction with an on-site interview. A total of 295 questionnaires were returned for Wupatki. The on-site survey repeated the questions asked in the trip fact sheets, whereas the mail-back questionnaire provided more detailed information.

Visitors to Wupatki reported that they came to the monument to see archeological ruins and to look at the scenery. Things that most bothered visitors include the heat, smelly rest rooms, disturbance of the sites, people disobeying rules, and the fact that visitor center displays need modification. A few visitors commented on a lack of signs near the pueblos, unsupervised children, and an overall lack of ranger presence. When asked about what they would like to see changed, most visitors responded, "nothing." Among the changes that some visitors did want were more ranger talks and guided walks and better and more information, including updated exhibits, a video or movie on how the early native people lived, a reconstructed dwelling, more detailed maps, living history, and self-guided tours to the backcountry.

Public Comment

[Briefly characterize the public response to the DEIS.]

The National Park Service received 16 comments on the Wupatki National Monument Draft Environmental Impact Statement / Draft General Management Plan. One was from the Hopi Tribe, five were from federal and state agencies, three were from non-governmental organizations, and seven comments were received from individuals.

Most comments from individual expressed opinions about the preferred alternative. Some individuals agreed with the preferred. Other commenters agreed generally with the preferred but disliked either the construction of a new visitor contact station near Highway 89, the realignment of the road to Wukoki ruin or both. One individual requested clarification on uses with in the monument. Comments from the Hopi Tribe expressed support for Alternative #4, Emphasis the Integrated Story Between the Parks and Minimize Development.

Some of the letters received have ideas that were outside the scope of the general management plan/environmental impact statement. The National Park Service values this input and where applicable it will be taken into account in future plans. Substantive comments were addressed in the final EIS on pages 247-288.

Agency and American Indian Consultation and Coordination

A number of meetings were held with staff from the U.S. Forest Service and Arizona Game and Fish Department. These meetings were held to discuss impacts that the alternatives might have on adjacent recreational activities and impacts to wildlife and their movement corridors and to try to ensure that NPS planning would be in support/harmony with their agency planning efforts. Several of these conversations explored the possibility of joint or co-management of resources and visitor uses.

Add information about section 106 and section 7 consultation

In keeping with its mandates for tribal consultation, NPS consulted with many American Indian tribes throughout the planning process. Based on ethnographic research efforts and previous consultations conducted for the Flagstaff Area national monuments during the last several years, ten tribes were identified as having potential traditional associations with park lands and resources. They are the Havasupai Tribe, Hopi Tribe, Hualupai Tribe, Navajo Nation, San Juan Southern Paiute Tribe, Tonto Apache Tribe, White Mountain Apache Tribe, Yavapai Apache Nation, Yavapai-Prescott Tribe, and Zuni Tribe. All ten tribes were contacted by letter and telephone, inviting them to attend an introductory meeting in October 1997. Six of the ten tribes participated in the October meeting, and four participated in a December 1997 consultation meeting. As of February 1998 participating tribes included Hopi, Hualupai, Navajo, White Mountain Apache, Yavapai Apache, Yavapai-Prescott, and Zuni.

At the first two consultation meetings the tribes discussed the purpose and significance statements and agreed on language for the final statements. They also discussed tribal involvement in identifying culturally significant and sensitive resources as well as plans for participation throughout the planning process. Early in 1998 the Hopi, Navajo, and Zuni Tribes agreed to conduct further NPS-sponsored research into tribal associations with park lands and identify particular sensitive resources and management concerns for the EIS. Representatives from three tribes attended the final tribal consultation meeting in August 1998 and assisted with the development of alternatives. Early in 1999 the Hopi Tribe and Navajo Nation submitted to NPS reports identifying culturally sensitive resources and specific recommendations for the GMP.

All ten tribes originally identified continued to receive newsletters and invitations to consultation meetings throughout the planning process. Tribal interests and concerns were fully considered in the planning process and in the development of alternatives in the GMP.

CONCLUSION

[Make a statement of whether all practical means to avoid or minimize environmental harm from the selected alternative have been adopted, and if not, why not (DO-12, 6.2A5). Repeat the impairment determination. Consider using language like the following:]

As described in the *Mitigation* section, all practical means to avoid or minimize environmental harm from the selected alternative have been adopted. Because there would be no major adverse impacts to resources whose conservation is (1) necessary to fulfill specific purposes in the establishing legislation or proclamation for Wupatki National Monument; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a goal in relevant National Park Service planning documents, there would be no impairment of the park's resources or values. After a review of these effects, the alternative selected for implementation will not impair park resources or values and will not violate the NPS Organic Act.

K.5 EXAMPLE OF A FONSI FOR A GMP/EA

The following draft FONSI was prepared for the Amistad NRA GMP/EA. (The FONSI has been abbreviated for this appendix.)

Finding of No Significant Impact

The National Park Service (NPS) is completing a general management plan for Amistad National Recreation Area (NRA). Amistad was established as a unit of the national park system on November 28, 1990, under the provisions of PL 101-628. Congress authorized the national recreation area to provide for public outdoor recreation and enjoyment of the United States portion of the Lake Amistad and to protect the scenic, scientific, cultural, and other values contributing to such enjoyment. Amistad NRA encompasses 57,292 acres, most of which is the U.S. portion of the reservoir's water surface.

The previous comprehensive planning effort (general management plan) was completed in 1987. Much has occurred since the completion of that plan. Patterns and types of visitor use have changed, lake levels have fluctuated, the adjacent community has grown, and public understanding and appreciation of the national recreation area's cultural and natural resources have increased greatly. Each of these factors has major implications for how visitors access and use the national recreation area, the facilities needed to support those uses, how resources are managed, and how the National Park Service manages its operations. A new plan is needed to

- clearly define resource conditions and visitor experiences to be achieved in Amistad NRA
- Provide a framework for NPS managers to use when making decisions about how best to protect NPS resources, provide a diverse range of opportunities for visitor experience, manage visitor use, and determine what kinds of facilities, if any, to develop in the national recreation area
- Ensure that this foundation for decision-making has been developed in consultation with interested stakeholders and adopted by the NPS leadership after an adequate analysis of the benefits, impacts, and economic costs of the alternative courses of action.

The draft general management plan/environmental assessment presents two alternatives for the future management of Amistad NRA, including the National Park Service's preferred alternative. The alternatives, which are based on the national recreation area's purpose, significance, and special mandates, present different ways to manage resources and visitor use and improve facilities and infrastructure. The alternatives are the no-action alternative (continue current management) and alternative B, the preferred alternative.

Preferred Alternative

Amistad NRA offers a diverse array of water- and land-based recreational opportunities, including fishing, boating, houseboating, sailing, waterskiing, scuba diving, hunting, camping, hiking, wildlife observation, and horseback riding. Renowned as one of the outstanding bass fishing reservoirs in the United States, Amistad NRA hosts more than 150 bass fishing tournaments annually. Amistad NRA offers waterfowl, upland bird, turkey, and big game hunting on one of the largest tracts of public land available for hunting in southwestern Texas.

Amistad NRA and the surrounding region are home to one of the most extensive concentrations of rock art and archeological sites in North America. This archeological record spans nearly 12,000 years of human history and prehistory. Within or adjacent to the national recreation area's boundaries are four National Register of Historic Places archeological districts, which collectively list 182 sites at the national level of significance. With more than 325 known rock art sites in an area of roughly 50 square miles, the Lower Pecos River valley has one of the densest concentrations of archaic rock art in the New World. Some of North America's oldest, largest, and best-preserved rock art sites are within the national recreation area's boundaries. Four major prehistoric styles and one historic period pictograph style are represented in the

region. Amistad NRA is home to the third-largest museum collection in the national park system. The collection includes artifacts from more than 200 sites and 22 major excavations. The collection is estimated to contain more than 1 million artifacts and objects.

Like other border national park system units, Amistad NRA faces law enforcement challenges relating to illegal drug smuggling, illegal immigration and securing the border of the United States. Eighty-three miles of the U.S.-Mexico border are within the boundaries of the national recreation area.

Under the preferred alternative, NPS management would build upon Amistad National Recreation Area's distinctive combination of cultural and natural resource and its variety of outstanding water- and land-based recreational opportunities to create a unique recreational and educational opportunity in southwest Texas. The national recreation area would be used as an outdoor classroom and resource-based educational opportunities would be expanded to give visitors a deeper appreciation for the history, cultures, and natural environment of the Lower Pecos River valley and the Rio Grande borderlands. Opportunities for water-and land-based recreational activities would be expanded.

Additions and improvements would be made to Amistad's existing infrastructure to enable managers and staff to enhance security, meet NPS commitments to homeland security, provide for better resource protection, and expand visitor education and interpretation. These improvements would include the construction of a new headquarters facility, a visitor center, a law enforcement facility, and a maintenance facility.

Alternatives Considered

Besides the no-action alternative, other alternatives considered but eliminated from further analysis included:

- Decommissioning Amistad National Recreation Area as a unit of the national park system. Under this proposal, Amistad NRA would be turned over to the jurisdiction of the state of Texas and the Texas Department of Parks and Wildlife. This alternative was not analyzed because of economic infeasibility, conflicts with legislative purpose, and the potential of unacceptable environmental impacts.
- Focusing the majority of budget and staff time on maximizing recreational activities at the national recreation area. This alternative was eliminated from further analysis because there was a potential conflict with the national recreation area's purpose, significance, and legislative mandate and because there was the potential for unacceptable environmental impacts.
- Focusing the majority of budget and staff time on research programs. This concept was eliminated from further analysis because there was a potential conflict with the national recreation area's purpose, significance, and legislative mandate.

Mitigative Measures for the Action Alternatives

Congress has charged the National Park Service with managing the lands under its stewardship "in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (NPS Organic Act, 16 USC 1). As a result, the National Park Service routinely evaluates and implements mitigation whenever conditions occur that could adversely affect the sustainability of national park system resources.

To ensure that the implementation of the action alternative will protect unimpaired natural and cultural resources and the quality of the visitor experience, a consistent set of mitigating measures would be applied to actions proposed in this plan. The National Park Service would prepare appropriate environmental reviews (those required by the National Environmental Policy Act, the National Historic Preservation Act, and other relevant legislation) for these future actions. As part of the environmental review, the National Park Service would avoid, minimize, and mitigate adverse impacts when practicable. Implementing a compliance-monitoring program could be considered to be within the parameters of the National Environmental Policy Act and the National Historic Preservation Act compliance documents and U.S. Army Corps of Engineers Section 404 permits. The compliance monitoring program would oversee these mitigating measures and would include reporting protocols.

The following mitigating measures and best management practices would be applied to avoid or minimize the potential impacts from implementing the alternatives. These measures would apply to all alternatives.

[Note: the actual mitigation measures in the FONSI are not included here.]

Environmentally Preferable Alternative

The environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed by section 101(b) of the National Environmental Policy Act. This includes alternatives that:

(1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;

(2) assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings

(3) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;

(4) preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice

(5) achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and

(6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The environmentally preferable alternative is the alternative preferred by the National Park Service for Amistad National Recreation Area in this plan. This alternative would satisfy the national environmental goals; it would provide a high level of protection of natural and cultural resources while concurrently providing for a wide range of neutral and beneficial uses of the environment. The alternative would maintain and environment that supports a diversity and variety of individual choices, and it would integrate resource protection with an appropriate range of visitor uses.

The preferred alternative surpasses the no-action alternative in realizing the full range of the section 101 national environmental policy goals. The no-action alternative would not protect resources as well as the preferred alternative. More resource impacts would result from expected increasing use levels in the no-action alternative. Adverse impacts on visitor experience also would be likely to increase under the no-action alternative. Thus, the no-action alternative would not meet the following national environmental policy goals as well as the preferred alternative:

- attain the widest range of beneficial uses of the environment without degradation
- preserve important natural aspects and maintain an environment that supports diversity and variety of individual choice
- achieve a balance between population and resource use.

Why the Preferred Alternative Will Not Have a Significant Effect on the Human Environment

As defined in 40 CFR 1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse

Minor impacts of the preferred alternative include the potential for vandalism and theft of archeological resources resulting from increased visitor access to the national recreation area. Mitigating measures include programs to increase visitor awareness of the sensitivity of cultural resources, continued survey work of these resources, and the introduction of indicators and standards to monitor impacts on these resources and trigger appropriate management actions.

Minor to moderate beneficial impacts would include impacts on museum collections, visitor experience, socioeconomic environment, visitor access and transportation, and NPS operations, facilities, and concessions.

Degree of effect on public health or safety

Visitor safety would remain a priority under the preferred alternative. Increases in the ranger division and the development of new law enforcement facilities would help ensure a safe experience for all visitors and result in a long-term moderate beneficial impact on visitor safety.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas

As described in the EA, Amistad NRA contains or is proximate to significant prehistoric archeological and cultural sites. Wetlands are found in the riparian areas of the park and the Rio Grande Wild and Scenic River is located upstream of the park boundaries. However, there are no prime or unique farmlands, wild and scenic rivers or ecologically critical areas within the national recreation area boundaries. There would be no affects to such areas under the preferred alternative.

As described in the EA, no effects to natural or cultural resources were identified for the preferred alternative. There are no prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas affected.

Degree to which effects on the quality of the human environment are likely to be highly controversial

None of the actions described in the preferred alternative have the potential to be highly controversial.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks

There were no highly uncertain or unique or unknown risks identified.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration

No actions are proposed in the preferred alternative that are not consistent with the enabling legislation for Amistad National Recreation Area. This project will not set any NPS precedent.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts

There are no other actions which in combination with the preferred alternative would result in cumulatively significant actions.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

Compliance with section 106 of the National Historic Preservation Act was completed with a concurrence with the NPS determination of no effect by the Texas Historical Commission on November 29, 2006.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat

The U.S. Fish and Wildlife Service concurred with the determination of no effect on threatened or endangered species on November 15, 2006.

Whether the action threatens a violation of federal, state, or local environmental protection law

This action violates no federal, state, or local environmental protection laws.

Impairment

In addition to reviewing the list of significance criteria, the National Park Service has determined that implementation of the proposal will not constitute an impairment to Amistad National Recreation Area's resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the *General Management Plan/EA*, the public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies*, 2006). Although the plan/project has some negative impacts, in all cases these adverse impacts are the result of actions taken to preserve and restore other park resources and values. Overall, the plan results in benefits to park resources and values, opportunities for their enjoyment, and it does not result in their impairment.

Public Involvement

The environmental assessment was made available for public review and comment during a 30-day period ending August 31, 2006. Public comment received during this period was overwhelmingly in favor or the preferred alternatives. No comments in favor of the no-action alternative or another alternative were received. One reviewer recommended including additional detail describing the way in which the National Park Service and Amistad National Recreation Area would cooperate with state and local agencies and private organizations on the protection of archeological and cultural resources. An addendum to the FONSI will be prepared describing these cooperative efforts in more detail.

No substantive comments were received.

Conclusion

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Recommended: _____ _____

Superintendent Date

Approved: _____ _____

Intermountain Regional Director Date

K.6 EXAMPLE OF A BRIEFING STATEMENT FOR APPROVAL TO PRINT A GMP

Notice Briefing Statement

Unit: Chickasaw National Recreation Area

Title: Printing the Chickasaw National Recreation Area General Management Plan / Environmental Assessment (GMP/EA)

Background

- A notice of intent to prepare an EIS for the Chickasaw National Recreation Area GMP was published in Vol. 67, No. 184, of the September 23, 2002, *Federal Register*. The congressional delegation's staff was notified that the National Park Service was updating the GMP that guides the management of Chickasaw National Recreation Area during the initial scoping for this project in the summer of 2002.
- After the preliminary alternatives public meetings it was determined that an environmental assessment (EA) would be prepared for the compliance on the GMP since the level of controversy was low.
- Work has now been completed on the draft GMP/EA. The document is now ready for printing. Clearance is needed by the Directorate for printing the document, as per the July 6, 2006 memorandum from the Associate Director, PPFL. (NOTE: Because this is an EA, a notice of availability does not need to be published in the *Federal Register*.)
- The draft GMP/EA will be distributed for a 30-day public comment period in the summer/fall of 2006. The draft document will be mailed to the recreation area's mailing list, placed on the NPS PEPC website, and be available at the recreation area and other locations. Public open houses on the draft document will be held in Sulphur and surrounding communities. Input from local/state officials is anticipated upon release of the draft document. A finding of no significant impact (FONSI) is expected to be signed by the regional director, in the fall of 2006, completing the planning process.

Issues

- The planning team and park staff are not aware of any significant controversy or organized support for or opposition to the alternatives in the GMP/EA. Few public comments were received in the scoping process. Although several concerns were expressed during the public scoping process, particularly on the future of the recreation area's water resources, no issues were identified for the GMP that have the potential for controversial impacts. The planning process has generated little public interest and controversy and no substantive issues have been raised by the public.
- None of the three alternatives developed for the national recreation area would result in substantial changes in the operation and management of the area. No major or significant impacts to resources from any of the actions in the action alternatives were identified in the analysis of impacts.

Contact: Greg Jarvis, GMP Project Manager, Denver Service Center, 303-969-2198

Connie Rudd, Superintendent, Chickasaw National Recreation Area, 580-622-3161, ext. 1-200

K.7 POSSIBLE APPROACHES FOR ORGANIZING A FINAL GMP

The outline below identifies two different ways for organizing a final GMP. One approach is for public use, while the other is for internal park staff use. These different outlines were based on examining an array of final plans. Examples of other approaches for final plans can be seen in the Mojave NPres, Santa Monica NRA, Pictured Rocks NL, Dry Tortugas NP, and Zion NP. In general, final park plans traditionally have been written and designed for the public.

TABLE K.1. A PUBLIC PLAN COMPARED TO A PARK IMPLEMENTATION PLAN

A Plan for the Public	An Implementation Plan for Park Staff
Summary The Plan Next Steps	
Introduction — The Park in Context Region and Setting The Park Enabling legislation — Describe with the actual legislation in the appendix? Background — What is the purpose of the GMP? What do we hope to accomplish and what issues did we need to address?	**Introduction / Overview** What is the purpose of the GMP? How was the plan developed? What do we hope to accomplish and what issues do we need to address? (This section could include the issues that the park wanted to address in the GMP and the implementation steps necessary to address them. See the examples for Santa Monica Mountains, Zion, Redwoods, and Pictured Rocks.)
The Foundation Statement **Purpose of the Park —** Why was it set aside? **Significance of the Park —** Why is the park so special and important? **Fundamental Resources and Values —** What resources are critical to maintaining the park's purpose and significance? **Other Important Resources and Values —** What resources are particularly important to park management and planning, although they are not related to the park's purpose and significance? **Primary Interpretive Themes —** What should all visitors know about the park? **Special Mandates —** What specific agreements or legal mandates may influence management of the park?	**The Foundation Statement** Same as the public plan.
The Plan (the alternative being implementing) **Park Policies and Priorities (the baseline) —** What we considered when making management decisions regardless of the alternative chosen. **Concept —** What is the vision for the future of the park? (Description of the alternative from Chapter 2 of the GMP/EIS.) Management Zones — A zone describes (for example) the array of desired conditions for both resources in the park as well as visitor experiences that are (will be) maintained in the park *within that zone.* (Could be the table or text in conjunction with maps) Indictors and Standards — How will we know when we get there?	**The Plan** (the alternative being implemented) **Concept —** What is the vision for the future of the park? (Description of the alt from Chapter 2 in the GMP/EIS) Management Zones — A zone describes (for example) the array of resource conditions and visitor experiences that are (will be) maintained in the park *within that zone.* (Could be the table or text in conjunction with maps) Indicators and Standards — How will we know when we get there? Application of a management zone — Given the menu of options within a particular zone, what does the park plan to do in a particular

A Plan for the Public	An Implementation Plan for Park Staff
Application of a management zone — Given the menu of options within a particular zone what does the park plan to do in a particular area? (Maps and text) **Boundary Adjustments —** Recommended changes in the boundaries of the park and the rationale. **Other** (e.g., Wilderness, Land Transfers) **Issues Addressed by the GMP** — The issues that the park wanted addressed in the GMP and the implementation steps necessary to address them. (See attached examples for Santa Monica Mountains, Zion, Redwoods, and Pictured Rocks.)	area? (Maps and text) **Boundary Adjustments —** Recommended changes in the boundaries of the park and the rationale. **Other** (e.g., Wilderness, Land Transfers) **Implementation of the Plan —** Future plans and studies that would be required for implementation.
	Resources in the Park — Move beyond the fundamental resources. This is the "pull out" sections that could be handed to park resource staff during implementation. Note: This is the biggest difference between the two approaches. In addition to the information presented in the affected environment of the EIS this section would include the array of facts and figured collected during preparation of the GMP. This section could serve as a general reference for park resources staff and others. This information would could help guide implementation and contribute to plans that tier off the GMP. Cultural Resources Natural Resources Visitor Experience Park Operations Other (e.g., Concessions) **Questions to Consider:** Would this be an appropriate place to keep track of details such as all listed structures in the park? What about the individual projects that the projects wants to undertake in particular areas?
Appendixes: ROD/FONSI Legislation Servicewide legal and policy requirements Implementation related information from the GMP – could include cost estimates as well as other materials prepared for the GMP	**Appendixes:** ROD/FONSI Legislation Servicewide legal and policy requirements – if needed
Glossary	**Glossary**
Bibliography	**Bibliography**
Planning Team	**Planning Team**