

## 3. PROJECT INITIATION

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### 3.1 DETERMINING THE NEED FOR A GMP

The National Parks and Recreation Act (16 USC 1a-7) directs that GMPs “shall be prepared and revised in a timely manner.” Based on the experience of the National Park Service, other land managing agencies, and the private sector, such general plans are usually expected to have a useful life of 15–20 years. However, circumstances within particular parks may change more rapidly or more slowly, and the 15- to 20-year timeframe is an estimate of what constitutes a “timely manner” for making plan revisions. It is used in the definition of “currency” with regard to goals under the Government Performance and Results Act (GPRA).

For the purposes of the NPS park planning program, a GMP is considered current if it provides fundamental direction for a park upon which management decisions can be made, and it meets the requirements of the National Park and Recreation Act of 1978 (PL 95-625).

#### 3.1.1 Factors to Consider in Determining Need

In 1998 the National Park Service adopted park planning policies and standards that incorporated new concepts about how general planning could best serve the parks. The new policies and standards called for GMPs to be reoriented to focus less on specific developments and other activities and more on broad direction about the kinds of resource conditions and visitor experiences to be achieved and maintained in the parks. The primary reasons for changing the overall approach to general management planning were

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Sometimes the questions are complicated and the answers are simple.  
—Theodore Geisel (Dr. Seuss)

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- Experience showed that previous plans, which focused on specific problems, facilities, and management actions, often became obsolete before they were implemented.
- Managers needed agreement within the agency and with the public about long-term direction (that would not become obsolete) to support consistent, defensible decisions.
- It was difficult to get stakeholders to consider the park holistically and over a long term when immediate problems and fixes were being debated.

The GMPs prepared under the new policies and standards are considerably different from many of the plans prepared under the previous policies. Most of the plans adopted prior to 1998 do not meet the current program standards. Although some of these plans may provide adequate guidance for the park over the next few years, the majority of national park system units have plans that are substantially out of date and are not likely to be adequate in providing direction for contemporary issues.

Since the adoption of *DO #2* in 1998, and its subsequent incorporation into the 2004 *Park Planning Program Standards* and the *NPS Management Policies 2006*, the expectations of what should be included in GMPs have expanded to include

- thoughtful analysis of what resources and values are “fundamental” to a park’s purpose and significance
- rigorous analysis of potential for impairments
- more refined guidance on user capacity
- more detailed analysis of the costs to maintain the park’s infrastructure, and attention to departmental emphasis on asset management

Park managers and staffs who have not formally addressed these basic considerations will need to do so, usually most effectively and efficiently through a GMP process. Other compelling reasons for developing new plans include substantial changes in the amount and type of visitation, new research or scholarship about what is most important in the park, changes in adjacent land uses, opportunities for partnerships, and interest in transit systems to address the impacts of increased visitation. Many parks report that a new GMP is needed to provide a forum for consultation with a wide range of people, including park neighbors, local officials, Indian tribes, and other agencies.

### **3.1.2 Considering the Costs of a GMP**

The time and effort required to update or develop a new GMP may vary greatly, depending on the complexity of unresolved issues, the potential for controversy, and other factors. The following are primary factors that affect the cost and efficiency of producing a GMP:

- complexity of unresolved issues
- the potential for controversy
- appropriate level of NEPA compliance
- the nature and extent of the public involvement strategy
- the lack of data on the location or condition of park resources, visitor use, or other key information

In addition to these factors, the foundation statement appears to have the potential to affect the cost and efficiency of producing a GMP.

## **3.2 AMENDING OR REPLACING AN EXISTING GMP**

GMPs are intended to provide direction for 15–20 years. The *NPS Management Policies 2006* state that GMP reviews may be needed every 10 to 15 years, but may be needed sooner if conditions change significantly (sec. 2.3.1.12). Conditions inside and outside parks are constantly changing — they may be changing faster than expected, or unexpected changes may be occurring, or changes that were anticipated may not be occurring. Planning standards may also change. Even in parks with strong traditions and well-established patterns of use and development, resources may be

threatened, sites may become crowded, visitation patterns might change, or the park's facilities may require extensive rehabilitation or maintenance. As a result, a GMP will become outdated.

As described in NPS policy interpreting the Government Performance and Results Act, a GMP is defined as current if it is 20 years old or less (based on the year when the record of decision for an EIS or finding of no significant impact for an EA is signed), and it satisfies the following statutory requirements mandated in the 1978 National Parks and Recreation Act:

- effective measures for the preservation of the area's resources
- appropriate indications of the types and general intensities of development (including visitor circulation and transportation patterns), along with locations, timing, and anticipated costs
- identification of visitor carrying capacities
- indications of potential modifications to the external boundaries of the unit

(These factors are also discussed in "Chapter 4. Legal Requirements for GMPs.")

The *Park Planning Program Standards* allow for amending an existing GMP, rather than undertaking a new GMP, to address a particular location, such as a new addition to the park, or a particular issue that might require changing some of the desired conditions in the GMP. The standards leave the decision to amend a plan, rather than develop a new plan, to the discretion of the superintendent and the regional director. However, if the existing GMP is not substantially current as defined above, the GMP should be replaced rather than amended.

Existing GMPs fall into one of four categories with regard to determining the need for an amendment or replacement:

- The current GMP remains relevant for a park (e.g., management zones and desired conditions are still relevant). In such a case the GMP would continue to be reviewed approximately every five years to ensure it remains valid.
- The current GMP does not meet the legal requirements of the National Parks and Recreation Act. In such a case the plan should be replaced rather than amended.
- The current GMP meets legal requirements but existing or anticipated issues facing a park require the preparation of a new GMP.
- One or more elements of a current GMP need to be added or changed, but all other aspects of the approved plan remain valid. In this case a plan amendment is warranted.

If a major change is needed that would have the potential to result in new or controversial actions or impacts that have not been analyzed, then a formal amendment or GMP replacement should be prepared. Examples of circumstances that might trigger a major change in a GMP include

- a boundary adjustment

- a change in adjacent land use that requires a major change in the management of park resources or visitor use
- a change in regional recreational opportunities that could significantly affect the park's resource management and visitor use
- a need for direction on how to address new types of visitor use or access, such as large group camping, river rafting, or backcountry access
- new conflicts between different types of visitor use
- new discoveries or scientific findings not considered in the original plan
- rezoning a large area, or significantly changing a management zone description due to a major change in resource conditions, use patterns or levels, or policy
- a significant change in a standard for an existing user capacity indicator that would change the management intent for an area.

In considering whether or not to prepare an amendment or replace a GMP, it is worth noting the advantages of undertaking a comprehensive GMP:

- Decision makers consider cumulative, long-term environmental impacts and costs, helping them avoid the creation or exacerbation of new problems as they solve old ones.
- Stakeholders participate in a single planning process, where they can share interests and concerns about numerous interrelated issues. Decisions made in this context are more likely to be broadly understood and supported over time.
- Implementation planning can tier off general planning for greater efficiency and cost-savings over the long run.

Prior to pursuing the implementation planning efforts listed below, first consider completing a GMP amendment or a GMP replacement to provide general direction:

- a comprehensive interpretive plan that suggests a change in visitor circulation
- a resource management/stewardship strategy that identifies a threatened or endangered species that might require seasonal closures in areas not previously considered to be especially sensitive
- a wilderness stewardship plan
- a cultural landscape report that suggests a change in treatments for a specific area
- a land protection plan that identifies parcels expected to remain in private ownership when the GMP assumed they would be acquired by the National Park Service
- a commercial services plan

Some of the advantages of amending, rather than replacing, an existing plan could be

- lower cost than writing a new GMP

- less elapsed time, and less commitment of park staff
- more concentrated focus on a few specific issues and concerns

Some of the risks of pursuing a plan amendment, in lieu of writing a new GMP could include

- a “piecemeal” decision-making process, which can overlook cumulative effects
- the potential to solve one problem but create another one
- public objection or fatigue with multiple planning processes if additional amendments seem likely
- greater long-term costs for multiple projects and compliance documentation if additional amendments seem likely

If the decision is made to amend an existing GMP, two types of amendments may be considered: (1) minor updates or “fine tuning” for small, non-controversial changes, and (2) major changes. The question of whether or not a change is minor or major is a judgment call of the superintendent and regional director, who should base their decisions on the magnitude of the change and the potential for environmental effects and controversy.

Minor changes to a GMP may include a slight geographic change where a zone boundary is located, or small changes in an area-specific desired condition that do not change the intent of the original plan. To stress again, these are minor changes that do not change the direction and intent of the existing GMP. Such minor updates should be documented in a memo to the file, provided that the impacts have been addressed in the previous GMP/NEPA document. If the impacts have not been analyzed, the updates should be evaluated in an environmental screening form to determine the appropriate level of NEPA compliance, and communicated to the public as appropriate.

Following is an example of the rationale for preparing a GMP amendment because of a change in adjacent land use and recreational opportunities (from the project’s PMIS Statement):

The State of Idaho Department of Parks and Recreation has successfully filed a Recreation and Public Purposes Act (RP&P) request to utilize adjacent BLM lands for the purposes of developing a campground to serve visitors to the City of Rocks National Reserve. This new development, which is in the final design phase, will eliminate the need to develop a similar facility within the reserve. It is likely that only backcountry campsites will be needed within the reserve to complement the visitor experience. This issue will be examined by a GMP amendment. The location of trailheads, picnic facilities, comfort stations and other items will also be addressed, as will site issues and scope of the project surrounding the location of the proposed park visitor center, which now has the opportunity to serve the new Castle Rocks State Park as well.

Examples of recent GMP amendments that have been done or are in process at the time of this writing include the *Lake Mead NRA GMP Amendment / EA* and the *Great Smoky Mountains NP Elkmont Historic District GMP Amendment / EIS*.

### **3.3 DETERMINING READINESS TO UNDERTAKE A GMP**

NPS *Management Policies 2006* require that park planning be based on scientific, technical and scholarly analysis. A critical element in developing a successful GMP is having a sufficient foundation statement and background studies and information necessary to inform the planning process. Gathering and synthesizing adequate data before starting the GMP helps develop the foundation statement and feasible management alternatives, as well as providing the necessary detail for well-documented descriptions of the affected environment and environmental impacts. Having sufficient pre-GMP studies limits the potential for delays in the GMP schedule when the need for critical information is “discovered” well after the process has begun. The *Park Planning Program Standards* suggest that studies begin up to five years before starting a GMP if a park does not have a well-established program of data gathering and analysis. Many parks may have significant amounts of raw data available, but often they have not been analyzed or synthesized for use in a planning framework. Having necessary and sufficient information is gaining more recognition as influencing the readiness for a GMP, and the intention is to place more weight on this factor in the NPS prioritization process for GMPs.

Typical information gathered before the GMP begins may include threatened and endangered plant and animal inventories, water quality studies, wetlands and vegetative cover mapping, historic resource studies, cultural landscape inventories, historic structures reports, archeology and ethnography overviews and assessments, and other relevant natural and cultural resources information. The types of studies to be undertaken should be tailored to the park’s planning needs to fill gaps and to update information that is out of date (see “Appendix L: Planning Data Needs and Sources”). Also some regional offices maintain lists of studies needed to ensure that adequate information is available to support general management planning.

### **3.4 REQUESTING AND RECEIVING GMP PROJECT FUNDS**

#### **3.4.1 PMIS Statement**

Parks in need of an initial GMP, a new GMP, or an amended GMP enter a project statement into the Project Management Information System (PMIS) as part of the annual servicewide comprehensive call. These nomination forms ask for descriptions of the major resource management, visitor use, transportation, and operational issues the park is facing and how a GMP might help resolve those issues. This information is then used to assess and rank GMP projects that are competing for NPS program funds.

The most important consideration in writing a good project statement is to explain the advantages of developing a GMP and what it will accomplish with respect to specific management problems. For example, a statement that the park is being affected by adjacent residential subdivisions (a problem) is not as useful as a statement that explains how developing GMP will help resolve this problem — by providing direction for identifying and managing the impacts of local recreational use on the park’s historic scene. Similarly, a statement that the park has just discovered an endangered species is not as useful as a statement that elaborates on how

developing a GMP will provide direction for the necessary adjustments in visitor use or administrative practices that might conflict with protection of that species. Park staffs are encouraged to consult with their regional planning chiefs prior to preparing a PMIS statement to find good examples and to involve them in developing a well-written PMIS statement.

Project statements may be entered in the annual call, but the priority list is usually formulated or updated every few years, looking five years ahead.

Projects that would amend a current GMP are eligible to compete for funding following the same procedures that apply to a new plan. However, several other sources of funding might be more appropriate for a GMP amendment (or compilation of past amendments). These include funds distributed by WASO PPSS as regionally directed funds (formerly referred to as discretionary) and a wide range of programs that might support planning work to address a specific issue. For example, if a GMP is being amended to address a specific construction project, management of an endangered species, commercial service issue, or cultural landscape treatment, funds from the construction, natural resources, concessions, or cultural resources programs might be available to support these types of planning efforts.

### **3.4.2 Evaluation of Factors Contributing to Readiness**

Once a project is ranked on the Servicewide Priority List, an estimate can be made of when funds might be available to begin work on the GMP. However, the decision to proceed requires an evaluation of several factors that contribute to “readiness.” These include

- availability of current and useful data
- outlook for continued tenure of current park leadership and commitment to participate in a multiyear planning process
- status of the relationship between the park and interested publics
- willingness of park neighbors, partners, and interested parties to proceed
- coordination with other planning processes of states, local governments, or other agencies
- other “political” considerations of timing to address potentially controversial issues

Two examples of PMIS statements, one for the *Petrified Forest NP GMP* and one for the *Ozark NSR GMP*, are included in Appendix B.1.

### **3.4.3 Initial and Annual Funding Allocations**

Each year regions are asked to submit to the WASO program manager estimates for new and ongoing GMP planning needs in the coming year. The call for estimates normally is sent to the regions via e-mail in mid-August, with replies due in mid-September. In consultation with the regional program managers, the WASO program manager identifies what adjustments are needed to balance the estimates with the funds that are expected to be available.

Twice a year regional program managers are asked to review the status of their projects and to identify any funding adjustments that might be needed to reflect delays (or acceleration) in progress. Adjustments in allocations to individual projects must be approved by the WASO program manager through the WASO budget office.

Annual requests for GMP project funds are the responsibility of the regional offices. For those projects being led by DSC, DSC coordinates with the regional offices to identify the project costs to be included in the regions' funding requests. Although GMP project funds are transferred directly to DSC for most GMP projects assigned to the center, the DSC role is to provide services to the regions as part of the regions' programs. Therefore, the regions have the ultimate responsibility for determining funding needs and to request funds for GMP projects in their regions from the WASO Park Planning and Special Studies Division.

### **3.5 PROJECT AGREEMENTS**

The project agreement (PA) is the comprehensive strategy for the project that explicitly identifies why, what, who, when, how, and for how much. The purpose of the project agreement is to get all the principal parties involved in the project so as to align their expectations and to operate from the same set of assumptions about what the task is and how it will be accomplished. The agreement includes the scope of the project, major issues, outcomes, roles and responsibilities, schedule, and budget.

Project agreements are typically prepared by the project manager in consultation with the park, region, and planning team using the PMIS project description as a starting point (see sec. 3.4.1 above). Internal scoping, including discussions, meetings, site visits, and data gathering, is conducted to determine the scope, staffing, budget, and schedule for the project. Official scoping under NEPA does not begin until the Notice of Intent (NOI) is published in the *Federal Register*; however, informal scoping may commence months before that point.

General management planning includes two distinct phases: (1) developing the foundation statement, and (2) developing the rest of the GMP. If the park is ready to plan (see sec. 3.3 above), then a single PA is written to cover both phases of the GMP planning project. If there will likely be a few years' gap between the foundation statement and the rest of the GMP, a relatively simple PA is suggested for the stand-alone foundation statement; another PA will then be prepared when the park and planning team are prepared to complete the rest of the GMP. The following guidance is for a PA for a complete GMP, including a foundation statement.

The standards for PAs are included in the *Park Planning Program Standards* and are not repeated here. This sourcebook provides additional discussion about what is typically included in each section of the project agreement.

#### **3.5.1 Content of a Typical Project Agreement**

##### **Cover Page (sometimes called Title and Signature Page)**

The cover page of the project agreement clearly identifies

- the project title that best describes the product or service being provided
- PMIS number
- the complete name of the park and other location information, such as state and NPS region
- the month and year the agreement was prepared
- the titles and signature lines and dates for all parties who will sign the agreement, including a representative of the office responsible for preparing the documents, the superintendent, and the regional director at a minimum (approvals may be via electronic means rather than by traditional pen and ink signatures)
- title and signature lines for formal cooperating agencies (if applicable)

The project agreement is an internal agency document. Including major partners and stakeholders (even legislated ones) as signatories to the PA is not recommended. Where the PA includes major contributions from stakeholders or partners, these should be summarized in the PA, but a separate memorandum of understanding is recommended as the proper tool to address their contributions specifically unless they are financially contributing to the project.

### **Introduction**

A brief introduction (one or two paragraphs) explains why the agreement is important, generally what it covers, and how it can be used to help ensure that the planning effort is effective and efficient. (See Appendix B.2.a for an example of an introduction statement.)

### **Project Purpose and Scope**

This section identifies the product to be produced (e.g., a GMP for Big Trees National Park) and addresses the scope of the effort (e.g., it may be a parkwide plan update or it may be an amendment that deals only with one issue). This section also identifies the type of accompanying environmental document (e.g., EIS), and any additional major products (e.g., wilderness study) to be included in the project. (See also “1.6. Integrating GMPs with Wilderness, Wild and Scenic River, and Commercial Visitor Service Documents.”)

The major reasons why a plan is needed can usually be found in the PMIS statement; however, new major issues may have surfaced since the preparation of the PMIS statement, and if so, they should be included in the project scope.

### **Project Background and Need**

The project background and need provides information about the park and the major reasons that the National Park Service is initiating a GMP for this park (e.g., new issues have arisen, Congress has expanded boundaries, or the existing plan is more than 20 years old and no longer addresses the current issues).

### **Primary Issues and Opportunities**

Central to developing a meaningful and useful plan is the rigorous consideration of issues. This section describes the primary issues and opportunities that are known when the project starts. The information in this section should be sufficient for the involved parties to understand and agree on the need for the project. Known areas of potential controversy should be identified. Each issue or opportunity should be briefly described so as to ensure understanding of the overall range of concerns encompassed by the project. The PMIS statement should be the basis for this section. However, the issues previously identified may have been revised or supplemented through the development of the foundation statement or through additional internal and external scoping. A significant change in issues, data needs, or public controversy that will result in major changes in the achievement of project milestones and/or major changes in the scope of the project will require a PA amendment, with associated reviews and approvals.

Special care should be taken to present issues as questions that need to be answered rather than as facts, opinions, or conclusions. For example, “the visitor center is inadequate” may be a fact or opinion, while the associated issue might be “what type of visitor experience is desired, and what kinds of facilities would be appropriate to support the desired visitor experience?” For another example, “social trails through the dune grasses cause destabilization of the dunes” may be a fact, while the associated issue might be, “what is the desired condition for the dune system, and what visitor experiences, management activities, and facilities would be appropriate to achieving that condition?” Issues to be addressed in the GMP should be described in sufficient detail that they are clear to someone who is not familiar with the park. Related to the second example above, a brief discussion might be required about how dune trampling leads to erosion and wind blowouts so readers understand the issue of what conditions and experiences are most desirable and what the implications might be for kinds and levels of visitor access and development. (See also Chapter 7.)

### **Primary Products and Services**

This section of the PA clearly identifies all the deliverables to be produced during the project, the major services to be rendered, the responsible office or party, and the funding source. The deliverables include hard copy documents as well as services provided. This section should typically cover items such as

- regional and WASO briefings and associated materials
- newsletters — how many and at what phases of the project (specify if additional educational newsletters are needed)
- intranet services (maintenance of internal and external PEPC websites)
- press releases
- public meeting facilitation services and comment summaries
- draft and final GMPs/EISs (including printing and mailing)
- final or “presentation” GMP

## Data Needs

Information needs that are critical to the success of the project should be thoroughly summarized, focusing on the kinds of data needed to address fundamental and other important resources and values and to resolve the primary issues that are known at the start of the project. The summary should identify what information is already available and where it is stored, and what new data is likely to be needed. Any needed special studies are described, such as visitor surveys, natural or cultural resource surveys, or transportation analyses, along with the responsible office, funding source, and means of acquiring funds. This discussion should recognize the current policy against the use of GMP funds to collect new data and should emphasize the responsibility of other program areas to support data collection. GMP funds are appropriately used primarily to gather, analyze, and summarize existing data that are readily available and necessary for the project.

A project should not be funded and started until critical data are available. To ensure adequate information for decision making, the time needed to collect critical missing data or to conduct necessary studies should be planned into the overall schedule between the foundation statement phase and the rest of the GMP phase.

This section should specifically address the facility condition assessment and asset priority information needs, and it should reference the importance of including a discussion of this new information in the cost estimates for the no-action alternative, as well as how this information will be used in the development of alternatives.

## Strategies for Public, Partner, and Staff Involvement

The PA must address public, partner, and staff involvement from the outset of the GMP project. Public involvement in general management planning is an integral and critical part of the NPS commitment to engage the public in a continuous, dynamic conversation that strengthens public and NPS understanding of the full meaning and contemporary relevance of the resources in each park unit. This section of the PA should articulate the public involvement goals, outline a communication strategy and protocols, and identify the key stakeholders and how they will be involved. It incorporates all the public notices, meetings, consultations, newsletters, and public review documents required under NEPA, NHPA, and the Endangered Species Act (ESA), and the additional requirements for planning projects included in *DO #75A: Civic Engagement and Public Involvement* (NPS 2003c).

Involving all members of the park staff throughout the planning process, especially those who are not on the planning team, is vital. This helps ensure that everyone responsible for implementing the plan has an opportunity to share their interests and concerns as the plan is being developed. Because park staff live in the communities that surround the park, they can share their understandings, beliefs, and feelings about the plan. This “grass roots” level communication can help a project, as long as staff members feel they have ownership of the planning effort.

Both the public involvement strategy and a general approach or simple strategy for park staff involvement should be included in the PA to guide these efforts (see “5.4.

Preparing a Public Involvement Strategy” and Appendix D). The public involvement strategy may be included as a summary or an appendix to the PA.

### **Compliance, Consultation, and Regulatory Requirements**

This section provides an overview of how the project will comply with NEPA, section 106 of the NHPA, the Coastal Zone Management Act, the ESA, and other mandates if appropriate. Specific attention to *Federal Register* notices and other NEPA public involvement requirements will help ensure that they are appropriately considered in the schedule and cost estimates. This section also should clearly state the known consultation and coordination requirements with the state and tribal historic preservation officers and other “consulting parties,” as defined for NHPA section 106 purposes (36 CFR 800.2(c)), with the U.S. Fish and Wildlife Service (FWS), and with any other agencies. It should also identify the office that is responsible for ensuring that these consultation requirements are met. Regional and WASO policy consultation on the PA can help ensure that the team has identified all the required consultations.

The Planning, Environment, and Public Comment (PEPC) System will be used for compliance tracking. PEPC is an online database designed to facilitate the project management process in conservation planning and environmental impact analysis. It assists NPS employees in making informed decisions with regard to a number of compliance issues throughout the planning, design, and construction process.

Some projects may appear to meet criteria for an EA as the appropriate NEPA pathway rather than an EIS. In those cases, this section should lay out the process that would be followed to make that determination (after scoping) and to obtain the needed policy waiver.

### **Project Management**

This section is new and not specifically identified in the *Park Planning Program Standards*. Its purpose is to clearly describe the overall project management approach, including procedures for a change in project scope, schedule control, cost control, and quality control procedures. (See Appendix B.2.b for an example.)

### **Communication Procedures**

This is a new section that provides an opportunity to address the critical issue of communication protocol within the planning process/project. It stresses that clear, open, and trust-based communication among team members is essential on planning projects. Topics may include administrative record responsibilities, document mailing, FTP file transfer, e-mail, FAX transfer, PEPC, team involvement and meetings, and document tracking. (See Appendix B.2.c for an example.)

### **Project Team Services, Roles, and Responsibilities**

This section acknowledges that GMP projects require extensive collaboration, coordination, and consultation among park staff, WASO and regional program managers, and planning and project management support staff. The project manager,

in consultation with the park superintendent and regional/WASO program leads (where appropriate), determines the needed expertise and available disciplines and is responsible for assembling a planning team.

Roles and responsibilities for each team member should be clearly delineated. Some members will be continually involved, while others will be consultants who will be identified and brought in at appropriate points in the plan development for additional information, review purposes, and perhaps some section writing. Seeking out appropriate interdisciplinary expertise relative to the particular park resources and purposes is especially important for a credible planning effort. This means that key team members for a cultural park like Gettysburg should include a historian and archeologist, whereas a hydrologist and biologist should play prominent roles in the plan development for a natural resource park like Everglades. Nevertheless, a “natural” park may need cultural resource management expertise on the GMP team, and a “cultural” park may need a natural resource expertise.

For each of the following key roles and areas of expertise, the PA specifies the primary responsibilities for each role and summarizes the appropriate opportunities for participation in the development and review of the GMP:

- project management / team leadership
- interdisciplinary project team
- key park, regional, and WASO program managers/consultants
- park and regional support staff
- contractors
- other participants and consultants (e.g., subject matter experts, peer reviewers)
- other park or regional office staff needed for special tasks (such as cost estimating)

For some roles, where a change in personnel would significantly disrupt the planning process, the PA specifies the person assigned to that role. (If there is no person assigned, put “unassigned” in lieu of the name.) If some of the work will be contracted, those services are identified along with the name and expertise of the contractor(s), if known. Scopes of work for contractor responsibilities are developed separately from the PA. The PA should avoid long lists of detailed assignments and instead focus on overall responsibilities. However, it is advisable for planning teams to specifically identify the staff responsible for several key assignments, including assistance with cost estimating, GIS support, American Indian consultations, PEPC administration, and primary contact with the public (including organization of meetings). For a planning team external to a park it also is desirable to identify a key contact or liaison to work with the park staff.

By signing the project agreement the superintendent, regional director, and program manager acknowledge an understanding and commitment of staff for the duration of the GMP.

### **Project Schedule, Including Major Milestones**

This section identifies major milestones and deliverables for the project and the estimated month and fiscal year of their initiation and/or completion. Major assumptions (such as review times) and constraints (such as limited annual funding) should also be identified. Detailed schedules are not recommended since they tend to evolve and quickly become outdated. Milestones requiring review and approval (e.g., regional director approval, WASO policy review) should be integrated into the schedule, including the office with the lead in completing that item. A chronological listing of these major milestones by fiscal year is the preferred method of presentation so as to present a clear understanding of the project flow. The PA needs to address a commitment and assigned responsibility for tracking the following major project milestones on the NPS intranet portion of the PEPC website <https://pepc.nps.gov>.

- project agreement approval
- notice of intent (NOI) published in the *Federal Register*
- public scoping meetings
- public scoping newsletter
- alternatives newsletter
- park and regional reviews
- WASO policy review draft
- draft GMP/EIS and notice of availability (NOA) published in the *Federal Register*
- public draft comment meetings
- final GMP/EIS and NOA
- record of decision published in the *Federal Register*
- final presentation GMP printed

### **Project Budget and Funding Sources**

This section clearly identifies the anticipated cost of the project by fiscal year and major project cost elements (e.g., personnel services, travel, printing, and contracting). The estimate is broken down according to fund source so that it is easily understood. For instance, those components being paid for by the GMP program, FLHP or FLHP/GMP support, cultural resources, park base, regional support account, or other sources need to be clearly identified, and the overall cost to each program by fiscal year needs to be apparent. Costs borne by the park for base-funded staff participation are not normally included in the PA. However, if the park is paying for travel for their staff to participate in public or team meetings, this should be delineated.

This section should summarize the assumptions that the cost estimate are based on, such as staffing needs, travel, public involvement, tribal consultations, consultant fees, approximate document sizes and numbers of copies, and the general print

quality (e.g., black-and-white versus color, which can have a major impact on printing costs). Be sure to include an inflation factor for each fiscal year. The Office of Management and Budget (OMB) mandates a 4% annual inflation factor for design and construction projects. Planning projects, which involve mostly labor costs, may require a higher percentage.

### **Project Closeout**

The project closeout section for a PA addresses a commitment by key participants to conduct a post-project evaluation of the strengths and weaknesses in the GMP process (including a documentation of “Lessons Learned”), proper accountability for the administrative record, and assistance to the park staff in the development of an initial implementation strategy for the GMP.

### **Amendments to the Project Agreement**

The PA should spell out the conditions or circumstances that would require an amendment, who may initiate an amendment, and the amendment review and approval process.

### **Appendixes**

Information that is useful to understanding the provisions of the project agreement should be attached if needed.

## **3.5.2 Examples of Project Agreements**

Examples of PAs can be found at the following locations:

*PEPC website:* <https://pepc.nps.gov>

*Intermountain Region website:*

<http://inside.nps.gov/regions/custommenu.cfm?lv=3&rgn=1005&id=5665>

*DSC Workflow template site:* <http://workflow2.den.nps.gov/Forms.htm#planning>

## **3.5.3 The Review and Approval Process for a Project Agreement**

Depending on region-specific protocols, the length of time associated with developing a PA will vary. Generally, the draft PA is circulated first to the park and region for input. Once comments have been incorporated, it is posted on PEPC and forwarded electronically to the WASO Park Planning and Special Studies Division. All major NPS programs are provided an opportunity to review and comment on the PA. WASO program managers review the project agreement for consistency with policies, program standards. Consolidated WASO comments are then returned electronically to the region, with instructions for the team on needed revisions. Once revised, the PA is recommended by the project manager, concurred with by the regional chief of planning, and approved by the superintendent and regional director. Copies of the final signed PA are sent to the park, region, DSC (if appropriate), and WASO PPSS. (For more details on WASO consultation and procedural guidance for PAs, see Appendix A.1.)

Development of the PA is a somewhat lengthy process from start to approval, and it may take six or more months after the project begins before it is final.

### **3.5.4 The Amendment Process for a Project Agreement**

A PA is a dynamic document. To remain useful, it must evolve as the project proceeds. Amendments may be handled with attachments or new agreements that highlight the changes agreed to by all the previous signatories. WASO policy review is not required for amendments unless there is a significant change in scope, schedule, or cost. A phone call or an e-mail to the WASO PPSS program manager can help determine this need, if there is a question. Copies of all signed amendments should be sent to WASO PPSS for the project file, and the changes should be reflected in the online tracking system. The following changes would require an amendment:

- significant changes in scope, data needs, or public controversy that will result in major changes in the completion of project milestones and/or major changes in the scope of the project (particularly those uncovered between the foundation statement and the rest of the GMP )
- changes in the schedule of more than 6 months
- any funding increase that exceeds the project ceiling
- changes in key personnel, such as the superintendent or project manager, that result in other changes listed above (e.g., delay of more than 6 months in the schedule)

### **3.5.5 Appeals**

The PA reflects a commitment by the signatories to complete a GMP that meets the established program policies, standards, and project scope with the funds identified. When projects are initiated, the planning team should anticipate the potential for changes in scope or schedule, advise regional and park leadership of the need to stay within budget, and consider sources of funding beyond the GMP program. The approved project ceiling should be considered the maximum amount that the GMP program can be expected to provide for the project, and the best possible GMP should be produced for that amount. Appeals are employed for exceptional project changes.

Recognizing the challenges in anticipating all potential costs in completing a GMP, the PLG has adopted a process for appealing for additional funds. The WASO program manager has authority to approve an increase of up to \$50,000 above the approved project ceiling amount. Appeals for any more than that amount need to be approved by a majority vote of the associate regional directors of each region (the Program Advisory Committee). In either case, an appeal must be written to explain why additional funds are needed, what alternatives have been considered to keep the project within budget, and what consequences are expected if the additional funds are not available.

To address the potential need for appeals, text describing the appeals process is included in PAs. Standard text for PAs is included in Appendix B.2.d.

### 3.6 PLAN TRACKING AND PUBLIC COMMENTS ON THE INTERNET (PEPC)

The Planning, Environment and Public Comment (PEPC) System, launched in 2005, is the NPS web-based project management and tracking database for all projects requiring compliance. The PEPC system helps manage all stages of the compliance process. It also is a valuable aid in developing a project's administrative record. All NEPA-related documents on WASO review, including the PA and all draft GMPs, should be posted on the NPS internal PEPC website. The system also includes a public site where individuals can find out about activities going through compliance, as well as the internal NPS site for project management information.

The public site (<http://parkplanning.nps.gov>) allows timely access from a single external website to project descriptions, NEPA process information (e.g., public scoping notices, meetings, and comment periods), and planning and NEPA documents (e.g., GMPs, fire management plans, EAs, EISs, and other plans and decision documents).

The PEPC system offers a simple way to comment on proposed or current projects by allowing individuals to post comments about planning documents directly into the PEPC system via a web-based comment form. Written comments are still accepted, but they will have to be scanned and entered into the system manually by project team staff. It is strongly recommended that PEPC be the only method of electronic comment made available to the public to reduce the amount of staff time required to manually input correspondence into the system. All GMP project teams must use PEPC as the web-based tool for communicating with the public. Newsletters and draft and final documents are all posted in PEPC. Questions included in newsletter comment forms should be included in the superintendent's introduction on the PEPC public site, with directions on how to respond to the questions.

The internal side of the PEPC system (<https://pepc.nps.gov>) provides the following features:

- tracking of major project milestones
- ability to post both public and internal documents for review
- ability to gather, analyze, and respond to internal and public comments
- team collaboration and communication
- access to planning project data at all levels and locations within the national park system
- reports on project status and trends across planning projects

Each project agreement needs to include roles and responsibilities for PEPC data entry and maintenance. Some parks have PEPC coordinators responsible for the integrity of the park project data; others do not and will rely on the project manager, a team member, or the regional coordinator for that role. For projects already underway, these responsibilities should be clearly identified if not already defined in the PA.

All internal system users must go through the appropriate PEPC training before being assigned a password for access. These courses can be taken by logging onto the intranet site “DOI Learn” ([doilearn.doi.gov/training](http://doilearn.doi.gov/training)). In order to receive a PEPC login and password to access the PEPC system, users must take the “Introduction to PEPC” course.

For more information on PEPC, the PEPC website has a helpful tool button. A PEPC guide, training materials, and e-courses, as well as other tools, are included under this button. Enhancements to PEPC are periodically updated under a link to “PEPC fixes.” Guidance for posting planning documents on PEPC for WASO review is included in Appendix A.4. Regional and park PEPC administrators are also useful sources and are listed on the PEPC home page.