

5. PUBLIC INVOLVEMENT FOR GMPS

5.1 INTRODUCTION

This chapter provides an overview of a public involvement philosophy and strategy related to general management planning. Specifically, the information in this sourcebook is intended to provide planners with

- an understanding of the NPS requirements for public involvement in general management planning
- an understanding of NPS and DOI policy and expectations with regard to public involvement and participation that apply to the planning process
- an understanding of what a successful public involvement effort looks like
- a framework for designing a public involvement strategy for a GMP
- sources for finding additional useful information on public involvement

Each public involvement effort is unique and must be tailored to meet the specific circumstances of the park and its particular combination of publics. However, the approach for designing a public involvement strategy is straightforward and is applicable to all public involvement strategies. The public involvement process should be responsive to and inclusive of a park's public, staff, and partners, and it should address issues and opportunities. Although this chapter provides some principles and suggestions, the planning team must identify and make choices on who to involve in the planning process, at what level, and when to involve stakeholders, partners, and the general public. Ultimately, it is up to each planning team to develop a creative, iterative approach to engage and involve the public and other governmental agencies throughout the planning process.

The biggest problem has been, and will continue to be, convincing the public of the need for sound management, protection, and preservation. But I believe in complete openness before the public. If we fail to make Americans aware of the problems facing the national parks, and to involve them in choosing the right solutions to these problems, then we are failing in our responsibility as stewards of these public lands.

— Russ Dickenson, Director,
1980–1985

For additional information on public involvement, see the sources in Appendix D.

5.1.1 Key Terms

Several key terms are used throughout this chapter. People often have different ideas of what terms such as “the public” mean. To ensure that readers have the same understanding of terminology, the following definitions apply in this chapter:

- *NPS staff and volunteers* — All full- and part- time employees, including employees of park and regional offices, program centers (such as DSC and HFC), and WASO are staff. Volunteers in parks (VIPs) are also included in this category.

- **Partners** — Many individuals and organizations can be viewed as partners with the National Park Service, working with the agency in achieving mutual goals and objectives. However, for the purposes of this chapter the term is more narrowly defined to include other governmental entities (local, state, and federal) that work or potentially will work with the Park Service in decision-making (planning) processes to achieve common goals. Working together with these organizations allows the planning team to ensure that the park’s mission is fulfilled and that the nation’s conservation and recreation needs are better met.
- **Public** — The public refers to many different people and groups that interact with the National Park Service. It is important to realize that there is no single monolithic entity called “the public.” The public varies with different NPS projects and can change during a park planning process — the public, their level of interest, and their comfort in feeling that their views have been considered may vary in each planning process or decision. *DO #75A* (NPS 2003c) defines the term to include

all of the individuals, organizations, and other entities who have an interest in or knowledge about, are served by, or serve in, the parks and programs administered by the Park Service. They include (but are not limited to) recreational user groups, the tourism industry, tribes and Alaska Natives, environmental leaders, members of the media, permittees, concessioners, property owners within a park, members of gateway communities, and special interest groups. The public also includes all visitors — domestic and international; those who come in person and those who access our information on the World Wide Web; those who do not actually visit, but who value, the national parks; and those who participate and collaborate with the Park Service on a longer- term basis.

Important members of the public include elected officials; federal, tribal, state, and local government agencies; interested private and nonprofit organizations; current and potential park visitors; traditional park users and others with special cultural ties to the park; scientists and scholars; and park neighbors.

- **Public involvement** — As defined in *DO #75A*, public involvement (also called public participation) is the active involvement of the public in NPS planning and decision- making processes. Public involvement is a process that occurs on a continuum that ranges from providing information and building awareness, to partnering in decision making. The NPS role is to provide opportunities for the public to be involved in meaningful ways; to listen to their concerns, values, and preferences; and to consider these in shaping NPS decisions and policies.
- **Stakeholders** — The term stakeholder refers to a subset of the general public. Stakeholders can be individuals, groups, or other entities that have a stake or strong financial, legal, or other interest in decisions concerning park resources and values. For example, stakeholders may include recreational user groups, permittees, and concessioners. In the broadest sense, all Americans are stakeholders in the national parks. Stakeholders can be internal (e.g., people or organizational units inside the agency, including regional and WASO staff) as well

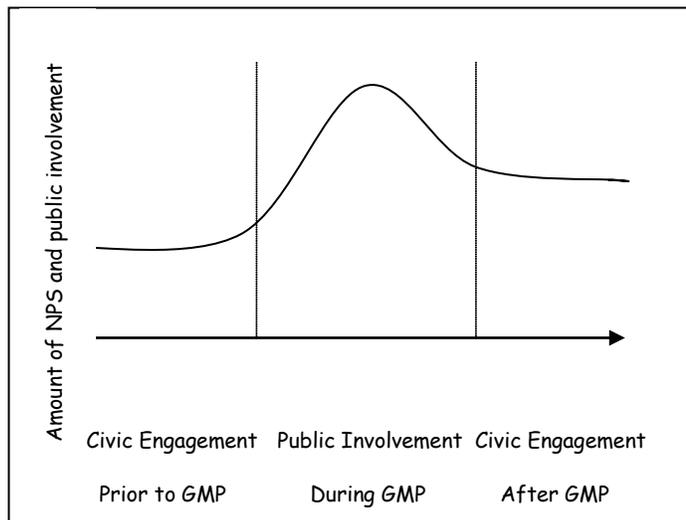
as external. Another term for stakeholders is “communities of place and interest.”

5.1.2 Civic Engagement and GMP Public Involvement

In the past many parks were insular and had little rapport or interaction with communities or governmental entities adjacent to their entrances and boundaries. Park management decisions were often based on the needs of resources and visitor experiences within the park, with little consideration given to regional and/or national issues or concerns. This worked when parks were, in fact, isolated and remote. Today parks are no longer the “islands” they once were. As our population has grown and gateway communities have multiplied, parks and their neighbors increasingly share the same issues, such as water and air quality, viewsheds, traffic congestion, and the quality of life within and beyond parks. Today we recognize that parks — and their neighboring agencies, communities, and tribes — are inextricably intertwined in a larger social, political, economic, cultural, and natural environment.

The National Park Service is committed to pursuing civic engagement — a “continuous, dynamic conversation with the public on many levels that reinforces the commitment of both the Park Service and the public to the preservation of heritage resources, both cultural and natural, and strengthens public understanding of the full meaning and contemporary relevance of these resources” (NPS 2006a). Civic engagement is the philosophy that guides NPS activities, including planning, across all functional lines at every level of the organization. It is founded on the central principle that the preservation of the nation’s heritage resources relies on continued collaborative relationships between the Park Service and American society. These relationships encompass significant and meaningful public involvement in NPS operations, programming, planning, and decision making. Civic engagement practices acknowledge that these relationships must extend to all communities that comprise America, especially those people who have felt little or no connection with the nation’s heritage resources or system of parks, or who have felt excluded from enjoying the parks. At its heart, civic engagement is about inclusiveness.

GMP public involvement, as prescribed by NEPA, is a subset of the NPS approach to civic engagement in park management (see chart). Parks are expected to have an ongoing relationship with the public that spikes during the GMP public involvement effort. Experience has shown that once people have been involved in park planning, their level of interest in that park continues to be higher than before the GMP effort.



The GMP public involvement process offers an opportunity to connect with the broad spectrum of American society (both near and far) and to provide an open door for people to discover and appreciate the personal meaning and relevance of heritage resources. It allows NPS employees to learn about the public's ideas, concerns, views, values, and perceptions regarding a park.

A GMP planning process is also an opportunity to build or enhance and enrich the existing relationships and partnerships that parks already have with their public and private sector neighbors, and with their national constituencies. Building these relationships and inviting outside interests to participate in the planning process can make it “their” planning process and the plan “their” plan — both of which increase the chances for a successful plan and positive long-term working relationship between the park and outside entities.

In summary, GMP planning provides an excellent opportunity to explore and “jump start” relationships with the public where they are absent and welcome all segments of the American public to participate in the life of the parks.

5.2 THE NEED FOR PUBLIC INVOLVEMENT IN GMPs

5.2.1 Legal and Policy Mandates

The National Park Service is required by numerous laws and policies to involve the public in planning. The Administrative Procedure Act requires agencies to give the public an opportunity to comment on major policy decisions that will affect them. NEPA and the Wilderness Act also have specific public involvement requirements. *NPS Management Policies 2006* and *DO #75A* call for public involvement in NPS plans and programs. The *NPS Management Policies 2006* (sec. 2.3.1.5 of) state the following:

Members of the public — including existing and potential visitors, park neighbors, American Indians, other people with traditional cultural ties to land within the park, concessioners, cooperating associations, other partners, scientists and scholars, and other government agencies — will be encouraged to participate during the preparation of a GMP and the associated environmental analysis. Public involvement strategies, practices, and activities will be developed and conducted within the framework of civic engagement. (Whereas civic engagement is the philosophy of welcoming people into the parks and building relationships around a shared stewardship mission, public involvement — also called public participation — is the specific, active involvement of the public in NPS planning and other decision-making processes.) Public involvement will meet NEPA and other federal requirements for

- identifying the scope of issues,
- developing the range of alternatives considered in planning,
- reviewing the analysis of potential impacts, and
- disclosing the rationale for decisions about the park's future.

The Park Service will use the public involvement process to

- share information about legal and policy mandates, the planning process, issues, and proposed management directions,
- learn about the values placed by other people and groups on the same resources and visitor experiences; and

- build support for implementing the plan among local interests, visitors, Congress, and others at the regional and national levels.

The need for parks to work more closely within larger contexts is repeatedly underscored in the *NPS Management Policies 2006* and several director's orders. Parks are part of a larger community of interests that can include neighboring communities, a variety of special interest groups, or other government entities — and it is critical to develop day- to- day working relationships whenever possible. The *NPS Management Policies 2006* specifically addresses collaborative planning and the need to work with gateway communities, other agencies, and tribes (see “External Threats and Opportunities,” sec. 1.5; “Partnerships,” sec. 1 .9; “Cooperative Planning,” sec. 2.3.1.9; “Addressing Threats from External Sources,” sec. 3.4; “Partnerships,” sec. 4.1.4; and “Consultation,” sec. 5.2.1).

Executive Order 13352, “Facilitation of Cooperative Conservation,” ensures that the Departments of the Interior, Agriculture, Commerce, and Defense, and also the Environmental Protection Agency, will implement laws relating to the environment and natural resources in a manner that promotes cooperative conservation, with an emphasis on appropriate inclusion of local participation in federal decision making, in accordance with their respective agency missions, policies, and regulations. The heads of each agency are required to carry out the programs, projects, and activities of the agencies in a manner that facilitates cooperative conservation, takes appropriate account of and respects the interests of persons with ownership or other legally recognized interests in land and other natural resources, properly accommodates local participation in federal decision making, and provides that the programs, projects, and activities are consistent with protecting public health and safety.

5.2.2 Other Reasons for and Benefits of Public Involvement in General Management Planning

Involving the public in general management planning is simply “good government” — the very basis of our system of government with its citizen oversight and mechanisms for checks and balances. The travel and tourism industry, recreational equipment manufacturers, historic preservation and environmental groups, park visitors, and many others have a strong interest in the way parks are managed. Every decision that the National Park Service makes affects people, some more than others, some beneficially and some, from their viewpoint, adversely. The Park Service often has to make controversial decisions, which should not be made by technical experts alone. People who are affected by NPS decisions expect, and have a right, to be informed of what is about to happen in a park, and to expect that their opinions, values, and needs will be heard and considered by the Park Service. As noted in *DO #75A*, the public also has a right to know about the challenges that confront the Park Service.

Encouraging public input can help the agency make more informed and better decisions, policies, and plans. Planners and park employees never have all the information or answers in developing a plan. Citizens and groups can provide new information, identify issues that planners were not aware of, and provide fresh insights into a park's resources, visitors, and how they interrelate. Citizens can provide new creative approaches to problem solving and planning, expanding the

range of management alternatives. Local residents are most qualified to tell planners about their own needs and experiences of living in proximity to a park. Their familiarity provides useful perspectives and a better understanding and appreciation of local circumstances. Likewise, involving regional and national groups can expand the understanding of park issues and improve the larger context for assessing the impacts of decisions.

Other benefits of effective public participation include sharing information and resources; raising and addressing controversy; minimizing or avoiding potential conflicts; improving the understanding of NPS missions, mandates, and goals; providing opportunities for NPS managers to build on and link to other agencies' programs to maximize effectiveness (and vice versa); reducing the potential for duplication of effort; maximizing the leverage of resources to reach the public; and minimizing the potential for contradictory or conflicting activities among the Park Service and other agencies and partners.

Finally, plans that are prepared with public involvement are more likely to be accepted and supported by people who can see that they have an authentic role in shaping the plan. Involving the public can show citizens that NPS staff are willing to listen to and where appropriate address their concerns, which can establish the foundation for building improved understanding, relationships, and support for actions being proposed. If people or groups do not feel they have been heard in a planning process, risks increase for opposition to a project, tactics to delay a decision, and even lawsuits, which can significantly increase costs and workloads of NPS employees.

In summary, GMPs inform the American public about the future management direction of a park. Public involvement in the GMP process allows for direct education and dialogue with NPS employees about the development of the plan. A GMP also acts as a springboard for developing long-term public relationships that are critical not only to implementing the plan, but to ensuring the overall protection and preservation of the park.

5.3 UNDERSTANDING EFFECTIVE PUBLIC INVOLVEMENT

5.3.1 General Principles

When people talk about successful public participation programs, they are talking about programs where the techniques matched the purpose of the program, reached the interested stakeholders, and resulted in a clear link between the public participation process and the decision-making process.

Effective public participation programs share the following characteristics:

- They have management commitment and a clearly defined expectation for what they hope to accomplish with the public.
- They are well integrated into the decision-making process.
- They target those segments of the public most likely to see themselves as impacted by the decision (stakeholders).

- They involve interested stakeholders in every step of decision making, not just the final stage.
- They make sure all voices are heard and make efforts to find people who may not have been traditionally involved (They provide alternative levels of participation based on the public's level of interest and the diversity of those participating).
- They provide genuine opportunities for public ideas, opinions, and concerns to influence the decision.
- They take into account the participation of internal stakeholders, as well as external stakeholders.

It takes much thought and planning to accomplish all of these points. That is why there is value in developing an integrated, systematic approach to public participation in each GMP planning process that is tailored for each situation.

Public involvement goes beyond simply informing or educating people about the issues and timetables; providing opportunities for people to comment; or conducting public relations activities. NPS planners and park staff need to provide opportunities for the public to contribute to decisions and to respond to their concerns, views, values, and ideas about those issues that affect the environment, peoples' lives, and the communities in which they live. The following public involvement principles help focus the development of a systematic approach to public participation:

- *Make the process timely* — Allow enough time for the public to participate fully, with enough advance notice for all activities and crucial points in the process.
- *Make the process reasonable* — Make sure the public is able to participate in venues where they feel comfortable, at minimum cost and commitment of time, while meeting the public involvement objectives.
- *Emphasize fairness* — Participants should agree that the process is fair, that all views offered are considered. The goal is to reach a decision that balances the diverse needs and wants of various groups and organizations. While planners will likely not incorporate every change recommended by the public, they should give serious consideration to these suggestions and respond by explaining why they agree or disagree.
- *Practice openness* — Public involvement requires an informed public. To participate effectively, the public must have access to accurate and timely information. Welcome and facilitate dialogue among all who wish to participate. Make sure that information provided to the public (documents, etc.) is accessible to all and is written so that people can easily understand it.
- *Start public involvement early and make it continuous* — Public involvement is based on the belief that federal planners cannot communicate too much with the public. The earlier planners begin the communication process, the better. Involve the public from beginning to end, and build relationships over the long term.

- *Make it tangible* — Clearly demonstrate the results of the public’s input so that the public understands how their involvement affected the decision or outcome.

5.3.2 Levels of Involvement

Typically GMP teams are composed of designated park staff, professional planners from the regional office and/or DSC, and private consultants, if needed. These teams consult and coordinate with a great variety of stakeholders. Different stakeholders may have missions, goals, interests, and activities that complement those of a park. Other times, stakeholders’ missions, goals, and activities may be in conflict with those of other groups or with National Park Service. It is important to understand these similarities and differences in order to resolve potential conflicts and to support the doctrine of “no surprises.” When everyone knows and understands what all of the players need to accomplish, collaboration on how to meet those needs in mutually compatible ways can begin.

There are several different levels of public involvement, ranging from active one-on-one encounters to more general information sharing. The different levels generally relate to a stakeholder’s degree of interest and ability to influence park management and the planning process. The following are general guidelines for involving various categories of stakeholders early in the planning process, recognizing that any particular stakeholder may express a different degree of interest or influence that warrants a different level of involvement as the planning progresses.

Elected Officials: One-on-One Briefings

The congressional delegation and the state legislators (or their staff) are usually briefed on the GMP process in one-on-one meetings. Likewise, affected local elected officials are briefed and asked to voice their ideas, issues, and concerns. Briefings for elected officials precede notification of other stakeholders, including the public. Attempts are made to meet individually with national and state elected officials, ideally by the park manager. Park staff or members of the GMP team may brief local officials.

Other Government Entities: Partners’ Meetings

Other governmental entities with a direct interest in the GMP/EIS (e.g., townships, cities, counties, regional councils, state, tribes, and other federal agencies) are usually involved at regular milestone planning sessions. These include an introductory group session that the GMP team coordinates, in which each entity shares its organization’s mission, roles, and interest in the region and the park. These sessions serve to scope the project with these stakeholders and to elicit ideas, issues, and concerns from them. In subsequent sessions the entities may identify desired conditions for resources and visitor experiences, how those conditions fit into the regional ecosystem, and alternatives for achieving them. At a minimum, the governmental entities are usually involved in sessions at scoping, preliminary alternatives development, and alternatives analysis, including the selection of a preferred alternative. This level of involvement, which includes advising the federal agencies, must be limited to

governmental agencies and Native American tribes to conform to Federal Advisory Committee Act (FACA) requirements. For more information on FACA see Appendix D.1 and *National Park Service Guide to the Federal Advisory Committee Act* (NPS 2005d).

Private Organizations and Individuals: Make Presentations at Regularly Scheduled Meetings or Schedule One-on-One Meetings

Groups in this category (e.g., adjacent landowners, affected businesses and agricultural groups, nongovernmental organizations, chambers of commerce, environmental organizations, service clubs, user groups) may not meet more than once as a group convened by the National Park Service due to guidance in FACA. Rather, GMP or park staff often ask to be placed on the agendas of the regularly scheduled meetings of these groups to tell them about the GMP planning process and to elicit comments and concerns. Several categories of private sector interests may be convened as one-time focus groups in order to inform them of the GMP process, to conduct a use survey, and to listen to issues that they might have regarding management of the park. Sessions focused on select constituencies, such as adjacent homeowners, may be attended by the team when the meeting is convened by another host entity, such as the county or the constituent group.

General Public: Multi-Venue Information Sharing

Three series of public workshops/meetings are usually coordinated by the GMP team. Milestones highlighted in the workshops include scoping, development of preliminary alternatives, and completion of the draft GMP/EIS. Planning teams usually hold public meetings at the scoping and draft GMP/EIS stages. It is also a good idea to bring the public back into the process at the preliminary alternatives stage because it provides a chance for the team and public to interact in the middle of the long period of time between scoping and the publication of the draft document. It also allows the team to check in with the public before a lot of time is invested in completing the impact analysis and preparing the draft document. This contact gives important feedback on options that are being considered by the planning team but that might be unacceptable to the public, as well as any addition options that should be included. This information is valuable when the planning team prepares to develop a preferred alternative through the CBA process.

Public workshops should be designed to accommodate many different styles and personalities of communication. All comments received from any of the comment opportunities become part of the administrative record. The managers of the park should usually be available for questions and discussion during the workshops. (See Appendix D.5 for tips on holding public open houses.) The GMP team should consider public outreach beyond newsletters. A useful technique is to scan the local and regional constituencies to find out how they receive and share information, and then craft custom communication methods that fit with those existing methods. Another mode of contact for the general public is a series of briefings for groups or individuals directly affected by the plan. Park staff and/or the planning team staff may present information during regularly scheduled meetings of interested groups, providing the latest information about the process, and receiving comments and

ideas. The NPS PEPC interactive website can be used to transmit, receive, and process information electronically.

Interior Department and NPS Directorate: Briefings

The planning team should guarantee “no surprises” at all steps. Top levels of the agency and the department are usually briefed by the team, the region, and the park staff at critical decision and public contact points. The WASO program manager should be invited to these meetings. A briefing statement should be forwarded to PPSS two days before the scheduled briefing to ensure that the planning manager and officials to be briefed have some background on the topics to be discussed.

5.4 PREPARING A PUBLIC INVOLVEMENT STRATEGY

The key planning phases for a GMP usually include the preparation of the foundation statement; scoping; development of alternatives; completion of the draft plan; completion of the final plan (for an EIS); and issuance of a record of decision (ROD) for an EIS, or finding of no significant impact (FONSI) for an EA. From a public involvement standpoint, the key planning phases are scoping, development of alternatives, and publication of the draft plan. From the planning team’s viewpoint, public input is most helpful at the scoping and alternatives development stages; at the draft plan stage public input tends more often to be voting for an alternative, which is not as helpful. In general, the public is involved to a far lesser degree in the other planning phases with the possible exception of the development of the foundation statement (which may involve selected experts and key stakeholders) because they are being notified of the outcome of the other planning phases.

When developing a public involvement strategy, the planning team must clearly articulate the purpose of involving the public at each planning phase and examine the information exchange needed between the National Park Service and the public before selecting a public involvement technique. This ensures that the technique selected supports the identified purpose. This systematic planning approach improves the likelihood of developing a satisfying and successful public involvement effort for everyone involved.

Two general principles should be considered in developing a public involvement strategy:

- Encourage the participation of the superintendent in developing the strategy. It is critical that the superintendent be involved in public involvement planning. If the superintendent cannot participate, the planning team needs to know at what points the superintendent and regional director want to be briefed on the results of the public involvement effort, and if there are any constraints that the superintendent believes need to be placed on the process. Ideally, the superintendent should also participate in the public outreach activities as much as possible, even if only as a listener, so that he or she experiences the breadth and intensity of public concerns and ideas in person.
- Align the public involvement schedule with the rest of the planning process. The most frequent complaints about public participation programs are (1) the

public is involved too late in the process, and (2) there is no clear connection between the public participation process and the decision being made. To be effective, public participation needs to be integrated into the planning process. This means that public involvement activities must be carefully scheduled. If public ideas are going to influence decisions during the planning process, the public must be given information and their views obtained in a timely manner. Using the framework to develop a public involvement process for each phase in the planning project can help mesh the public involvement schedule with the rest of the project schedule.

The public involvement schedule can have various impacts. For example, if the timeframe is too short, the public may get the message that the National Park Service is not serious about allowing enough time for genuine participation. This can undermine the credibility of the public participation process. The schedule may also impact which public participation techniques can be used. There may be techniques planners would like to use that simply cannot be completed in the time available. This can force a switch to techniques that may not be as effective but can be completed in the time available.

Appendix D.2 provides a four- part template for preparing a public involvement strategy that covers the key phases in preparing a GMP/EIS or EA.

5.5 EVALUATION OF PUBLIC INVOLVEMENT EFFORTS

Public involvement is an ongoing process. It does not stop once a planning phase is completed or a plan is finished. Indeed, *DO #75A* requires public involvement at all levels in the National Park Service and within all program areas where “1) the public has an identifiable interest or is likely to be interested, 2) there may be applicable knowledge or expertise likely to be available only through public consultation, or 3) there are complex or potentially controversial issues.”

To ensure that a public involvement effort is effective, it should be periodically evaluated. Public interest can dramatically increase or fade away during a planning process. Following are some indicators that a public participation effort is working well:

- Individuals and groups are asking new questions rather than asking the same questions over and over.
- Individuals and groups are ready for the next phase and do not raise concerns about a lack of information.
- The appropriate NPS contact person or team is handling inquiries in a timely manner.
- Most of the public participation time is devoted to communication or information sharing between stakeholders and the National Park Service rather than addressing breakdowns or miscommunication.
- The channels of communication are well- defined and open.
- Interested parties are providing informed comments on the project.

- People are often bringing their concerns to the National Park Service rather than taking them directly to the media or elected officials.

If these conditions are not being achieved, then the team needs to reassess its techniques and determine what changes will improve the public participation effort. The following problems may need to be addressed:

- Public participation efforts may not be reaching the right target audiences in effective ways.
- The public may not have adequate access to information, may not understand the information, or may need more detailed information.
- Stakeholders may not understand how to effectively participate in the process; or they may feel that the planning or park staff are not listening to them.

The best way to evaluate the success of a public involvement effort is to ask people what is and is not working.