The Honorable Nathaniel P Reed
Assistant Secretary for Fish and Wildlife and Parks
Department of the Interior

Dear Mr Reed:

We recently completed a survey of certain aspects of the Department's outdoor recreation programs. We identified several matters which we believe warrant your attention. The areas include:

--overall planning for national outdoor recreation needs and resources needs to be improved,

--weaknesses in the processing of alternate transportation system studies for national parks, and

--the system for identifying maintenance needs in national parks needs to be improved.


Overall planning for national outdoor recreation needs and resources needs to be improved.

Public Law 88-29, enacted May 1963, authorized the Secretary of the Interior to prepare and maintain a comprehensive nationwide outdoor recreation plan and a continuing inventory of the Nation's outdoor recreation needs and resources.

According to the act, the plan was to identify critical outdoor recreation problems and set forth solutions and actions to correct the
problems  The initial plan was to be prepared and sent to the President for transmittal to the Congress not later than May 1968, and updated and sent to the Congress every five years thereafter.

The initial plan, as you know, was not sent to the President until November 1973. Further, it was not very favorably received by many members of the Congress and a number of the States. For example, the plan was criticized because:

--It did not set forth a specific program of recommended action.
--It failed to recognize the problems in administration, operations, and maintenance of outdoor recreation facilities.
--It did not include recommendations on the amount of public and private investment needed to meet future outdoor recreation demands.
--It was too limited to be used for planning guidance.

We discussed these complaints with BOR officials and also inquired into the procedures which are to be followed in preparing the next plan which is due in 1978. We were told that the 1978 plan will be primarily a "policy document" for the Congress and the Administration. The plan, the officials added, will not include detailed information on such things as site planning, but instead will provide the States, local governments, and the general public with a "description of the Federal role" in providing outdoor recreation opportunities to the people. The officials further stated that the 1978 plan will emphasize "wild and scenic rivers and urban recreation." Following this approach, although we recognize that complete details and specific procedures have not yet been formulated, there is some question as to whether the 1978 plan will be of use and assistance to the States and local government agencies in guiding and helping them to carry out their specific plans and programs.

In connection with the need to plan for and identify recreational resources, the act authorized the Secretary to prepare and maintain a "continuing inventory" of the Nation's outdoor recreation needs and resources. To date--13 years after enactment of the legislation--no such inventory has been prepared.

BOR officials said information on recreation needs and resources is collected and maintained by most States. However, the manner in which the information is collected and summarized varies from State to State. According to BOR officials it is virtually impossible for States to analyze and/or compare their recreation resources, demands, and needs with other States on either a regional or nationwide basis.
The Outdoor Recreation Resources Review Commission, established by the Congress in 1958, reported to the President and the Congress in January 1962 that periodic nationwide inventories on recreation resources are necessary for sound planning. BOR officials recognize that a system to standardize a nationwide inventory is needed for policymaking purposes, for the allocation of facilities, and for site planning. Such standardization, to be effective, must be made at the national level, and BOR recently initiated a program to obtain uniform data from the States. We believe this action is appropriate, however, in discussions with BOR officials, we were told that procedures have not been established to insure that the inventory will be maintained and updated periodically. Such procedures, in our view, should be implemented as soon as possible so that the States and/or local governments are aware that they will be called upon on a regular basis to assist in maintaining current inventory data essential for nationwide outdoor recreation planning and management purposes.

In view of the congressional concern to develop a national outdoor recreation plan and related inventory, we believe that you should require the Director, BOR, to prepare the 1978 plan in sufficient detail to help insure that the States and local governments will be provided with appropriate data to assist and guide them in carrying out their own plans and programs. Also, we recommend that procedures be established for maintaining and periodically updating the inventory of our Nation's outdoor recreation resources and needs which BOR officials said will be prepared.

**Weaknesses in the processing of alternate transportation systems for the national parks**

In 1972, NPS initiated a program of alternate transportation systems within selected national parks which, according to the Park Service, has helped to alleviate increasing automobile traffic congestion and environmental damage. According to NPS reports, alternate transportation systems, such as shuttlebuses, vans, and minitrains, have also helped to conserve energy, minimize pollution, reduce management problems, and eliminate the need for additional development in some parks while, at the same time, providing the visitor with improved services.

NPS has stated that benefits resulted from alternate transportation systems in two principal areas—energy conservation and reduction in the construction and development of certain park facilities such as additional roads and parking lots. In the energy conservation area, NPS estimated that, in parks with alternate transportation systems, at least 250,000 gallons of gasoline are being saved annually by reducing or eliminating private motor vehicle use. With regard to facility development, NPS
officials reported that, in one park, a $6 million program, for the use of private vehicles, was not required after an alternate transportation system was implemented.

Currently, there are 16 alternate transportation systems in operation in national parks but according to a NPS official, such systems are needed in about 35 or 45 additional parks. In late 1973, however, the Office of Management and Budget (OMB) advised the Department that no additional studies or implementation of alternate transportation systems could be made in fiscal year 1975. In addition, OMB said that when ongoing studies are completed, they would have to be reviewed and approved by OMB before any funds would be granted to implement the system.

NPS officials said that in the last year, six alternate transportation studies, costing over $183,000, were sent to the Department's Office of Program Development and Budget (PDB) for review and approval. Four of these studies were sent in November 1975, one in February 1976, and one in April 1976. To date, about a year since the first studies were sent, none of the departmental reviews have been completed. According to a PDB official, it is not necessary to have the studies sent to OMB until the funds are requested by the Department to implement the systems. We discussed this matter with OMB, and were advised that the intent of OMB's directive was to permit OMB to review and approve the studies before the Department would ask for funds for the systems.

Because of increasing traffic congestion and environmental damage in some parks, we believe that PDB should complete, as soon as possible, its review of the studies received from NPS. Further, in view of recent increases in Land and Water Conservation Fund and the Administration's plans to further increase national parks under its $1.5 billion Bicentennial Land Heritage Program, additional alternative transportation systems in many parks may be warranted. We recommend, therefore, that the studies completed be reviewed and processed as promptly as possible and consideration be given to initiating additional studies in other parks as appropriate.

System for identifying maintenance deficiencies in the national parks needs to be improved.

During the 1976 budget hearings before a Subcommittee of the House Committee on Appropriations, the Director, NPS, stated that large budget and staffing deficiencies preclude major repairs, preventive maintenance, and replacement of equipment throughout the park system. He indicated that it would require an additional $45 to $50 million annually to operate the parks at an "acceptable standard."
NPS has established a "Management by Objective" system to identify and describe the mission, administrative policies, long-range objectives, and standards for each operating level of the Park Service. Under the preventive maintenance portion of the system, each park manager is to identify (1) total resources needed to carry out park maintenance activities, (2) total resources available to perform these activities, and (3) maintenance deficiencies resulting from the lack of resources. Unmet needs or deficiencies are identified and used in the budget process to justify requested increases in staffing and funds.

NPS has established maintenance activities "standards" which are to be used as the basis for determining if the park facilities are being maintained at an acceptable level. Examples of these standards include items such as Are furnishings free of objectionable deterioration and evidence of vandalism? Is ground cover damage from overuse kept to a minimum and bare spots reseeded?

By comparing total needs—referred to as "Resource Requirements Data"—with resources available, the park manager is to determine the maintenance deficiencies in the park.

During our survey, we noted several weaknesses which we believe raise some questions as to the reliability of the system and the validity and accuracy of the data being reported. For example:

--At two parks we visited, NPS maintenance officials said resource requirements data were not used to justify annual budget increases. Instead, increases were based on a maintenance official's personal knowledge.

--At the Everglades National Park, resource requirements data have not been prepared since September 1974, although NPS guidelines require that such data be prepared each year. Also, the 1974 data reflected only maintenance work done in-house and did not recognize work performed under contract, which was estimated by a park official to account for approximately 23 percent of all maintenance effort.

--NPS headquarters and regional levels have not reviewed resource requirements to determine whether (1) established maintenance standards were used, (2) estimated funding and staff requirements were reasonable, and (3) "deficiencies" reported were correlated to, or were in line with, requests for budget increases.

Park officials said regional guidelines, issued during the fiscal years 1977 and 1978 budget process, directed that budget increases be limited to an established percentage of the prior year's budget. As a
result, budget requests reflected only those needs of the parks most likely to be approved and did not reflect the total maintenance requirements for operating parks at the NPS acceptable level.

The Management by Objective system, as presently being implemented at locations we visited, is in our view only of limited use. We recommend, therefore, that you require the Director, NPS to take appropriate action to insure that the system be properly implemented if it is to be used for the purposes and objectives intended. Further, headquarters and regional levels of NPS management should establish measures to review and monitor the results attained under the system.

We are sending copies of this letter to the Director, Office of Management and Budget, the Assistant Secretary, Program Development and Budget, the Director, National Park Service, and the Director, Bureau of Outdoor Recreation.

We would appreciate receiving your views and comments within 30 days on any actions you have taken or plan to take on the above matters. Should you or your staff desire any additional information, please let us know.

Sincerely yours,

Frank V. Subalusk
Assistant Director