Superintendents’ Guide to Public Affairs

**TABLE OF CONTENTS**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Introduction</td>
</tr>
<tr>
<td>II</td>
<td>Directory</td>
</tr>
<tr>
<td>III</td>
<td>Media Relations</td>
</tr>
<tr>
<td>IV</td>
<td>Freedom of Information</td>
</tr>
<tr>
<td>V</td>
<td>Law Enforcement, Crime and Disasters</td>
</tr>
<tr>
<td>VI</td>
<td>Cheshire System</td>
</tr>
<tr>
<td>VII</td>
<td>Public Involvement</td>
</tr>
<tr>
<td>VIII</td>
<td>Filming Policy</td>
</tr>
<tr>
<td>IX</td>
<td>Reserved</td>
</tr>
<tr>
<td>X</td>
<td>Reserved</td>
</tr>
<tr>
<td></td>
<td>Appendix</td>
</tr>
</tbody>
</table>
INTRODUCTION
Memorandum

To: Superintendents, Western Region
   State Director, Hawaii
   Chief, Arizona Archeological Center
   Western Regional Directorate

From: Regional Director, Western Region

Subject: Guide to Public Affairs

This booklet has been prepared to help Superintendents and their staffs in working with representatives of the news media - both print and electronic.

Some of this material appeared in the Service-wide Guide to Media Relations which was issued in 1968, although much of the information has been updated and adapted to Western Regional use.

I urge you, and your designated Park Public Information Officer, to become familiar with its contents for I feel it can help you do a better job of telling the story of your Park and of the Service to the public we serve.

This handbook is presented in loose-leaf form to facilitate revisions and additions. However, these guidelines cannot possibly cover every aspect of your information program, nor answer every question that may arise.

This brings me to the role of the Public Affairs Office here in the Western Regional Office. Our public affairs professionals are here to serve you - the managers in the field. They are as close as your mailbox or your telephone. Their names and telephone numbers - both office and home - are listed on the following pages.

Feel free to call upon them any time there is a need - day or night.

Howard H. Chapman

Save Energy and You Serve America!
THE IMPORTANCE OF PUBLIC AFFAIRS

A good public information program has a lot to do with your "public relations"—with what people think about your park and about the National Park Service.

If your park is well managed and your programs are interesting and worthwhile, the public should be told. Indeed, since the public pays the bill you have a duty to let the people know about your program. As Fortune magazine puts it: Good public relations is simply good performance, publicly appreciated.

Simple as this may be in concept, it is not easy to attain. As with any active part of your program, you must work at it in a positive way. While your job, and the mission of the National Park Service may be clear to you, they are not equally well understood by the public. Your responsibility as a superintendent includes the basic task of informing the public on what you are doing, and why. This does not mean issuing news releases on every detail of your activity. Far from it. It does mean contact with the public on the major parts of your program, important developments within the park, and things of significance that happen there. Public appreciation, or public opinion, is sometimes fickle, and always fragile. And, obviously, opinion is influenced by many things which communicate ideas but have no relationship whatever to media or to the written word.

For example, the impact of a fine interpretive exhibit or AV program can be lost if the visitor encounters a dirty restroom on his way out of the park.

We are concerned basically here, however, with that part of public affairs which involves media, and media problems: with the press, with radio and TV, with photography, movies, advertising, and all the tools of mass communications. Use of these tools or techniques is so important that a special effort should be made to understand them, how they work, and what their particular needs may be.

Primarily, you will be dealing with news, that is, with matters of general interest, and with people who handle it—reporters, photographers, cameramen, editors, or commentators.

You must understand that it is their job to get the story. They are after answers to all the major questions—which are often referred to as the "who, what, where, when and why's" of a story. If the story is an important one—as, for example, the controversy over Yosemite master planning or the closing of visitor facilities at Manzanita Lake, a great many questions must be asked in order for the reporter to get a full understanding of what happened or what is going on.
Your job is to cooperate—to help the news people get the facts, clearly and in their true perspective. How to do this is the major subject of this handbook.

Let it be understood at the outset that we are a public agency employed in public business.

The public has every right to know what we are doing. Obviously, this applies equally to all communications media, and to individuals who write or ask questions about National Park Service activities as well.

This right is fully expressed in the Department of the Interior information policy (DEPARTMENTAL MANUAL Part 470), and it applies at every level and to every headquarters. The Department's policy on information is reprinted herein as Appendix A. Even if you have read it before, reread it now. It is an excellent guide, and answers many questions.

The Congress has reinforced this right by enacting the Freedom of Information Act of 1967, which was strengthened by further amendments in 1974. The provisions of the Freedom of Information Act, as amended, are discussed in a separate section. It is extremely important that you are familiar with the Act, as it applies to the National Park Service.

As a park manager, your concern is to make sure the public knows what your program is, what facilities are available for public use and when, what's going on in your park, who your people are, and so on. All of these matters will be of interest to the press, and to other media, as news or as feature material, or subjects for talks and programs.

News always has a time element. If information is fresh and unpublished, editors will use it promptly. If it is old, it probably won't be used at all.

Parks represent many values, and many special interests to people. Any one of the diverse values found in a park may be news, or useful information and you should be alert to these opportunities.

To help give you ideas for legitimate stories that would interest an editor we have prepared a check list. Review it frequently. In the press of your daily work, it is easy to overlook a newsworthy item of information.
NEWS CHECKLIST

Personnel.

1. New people on the staff
2. Promotions or transfers
3. Retirements
4. Awards
5. Alumni

Facilities.

1. New visitor centers; structures of any kind; plans for remodeling, moving or razing parking areas.
2. Campgrounds, picnic areas, trails.
3. Interpretive programs.
4. Transportation plans or installations.
5. Groundbreaking ceremonies; dedications.
6. Seasonal openings and closings.

Community relations.

1. Use of park areas or resources for a broad community purpose--e.g., as a school Environmental Study Area.
2. Participation in local activities or programs.
3. Services to the community: fund drives, speakers, services of personnel, emergency aid, loan of equipment.

Special items.

1. Proposed changes in park regulations.
2. Unusual uses of park--scientific studies, archeological recoveries, public hearings, etc.
3. Proposed changes in park management, including draft master plans, DCP's, NRMP's etc.
4. Wildlife or nature news or features.
5. Recreational opportunities.
6. Children or youth affairs.

Social.

1. Functions.
2. Employee Activities: Marriages, awards, graduations, etc.

Advance news on speeches.

*****

I - 3
II

DIRECTORY
DIRECTORY
OF
OFFICE OF PUBLIC AFFAIRS
WESTERN REGIONAL OFFICE
NATIONAL PARK SERVICE
450 GOLDEN GATE AVENUE
SAN FRANCISCO, CA., 94102

PUBLIC AFFAIRS OFFICER Edwin N. Winge (415) 731-0954
SECRETARY Ruth Combs (415) 556-5186

(Overall supervision, media relations, public information, public meetings)

MEDIA RELATIONS SPECIALIST/ SECRETARY Larry Quist (415) 897-7900
PUBLICATION AND WILDERNESS COORDINATOR Howard Beatty (415) 556-5560

(Primary field contact for news releases, queries. Coordinates scheduling, conduct of all public workshops/meetings)

PUBLIC AFFAIRS SPECIALIST Edward F. Pilley (415) 456-8779

(Public information, exhibits, speakers bureau, international visitors, assistance to field on publications and graphics)

PUBLIC INFORMATION SPECIALISTS LaVerne Cook (415) 556-4122
Jerdine Green 556-4122
Kyra Griffiths 556-4122
PARKCAST (Recorded Info) 556-6030

Los Angeles Field Office Ralph Harris, (213) 346-8777
Supervisor (213) 688-7150

Info Specialist (213) 688-2853

For Directory of Park Information Officers, Western Region, refer to Appendix C
III

MEDIA RELATIONS
HOW TO WRITE A NEWS RELEASE

Since the written news release is basic, you should make a special effort to abide by the time-proved fundamentals.

This is not the place for experimentation or fancy writing. Its purpose is not to entertain, but to inform, and to do that, it must present facts (not opinion) clearly, simply and completely.

A news release is easy to write when you have adequately prepared yourself. This means having all the facts—all the answers to the basic questions of who, what, where, when, and why, and all details such as proper spellings, correct figures, accurate titles, middle initials, and so on. Write these down, and keep your notes on your sources. You will be surprised how often you will be called on to check back, elaborate or clarify a point. Your notes will be invaluable.

You should understand at the outset that it is part of a reporter's job to probe for facts. They're suspicious, occasionally cynical perhaps; usually bright and certainly not easily fooled. A reporter will look at a handout critically, and change it to suit his or her publication's need or to satisfy their professional standards.

You should not expect your release to be used as you deliver it, or to be used in entirety. This is not important.

It is important, however, to prepare a news release in such a way that it can be used as submitted, or nearly so. If you save a busy newsman's time, it is appreciated.

If your story strikes a specially responsive chord, the editor may decide to give it more space or a different treatment. Perhaps he will assign a reporter to call on you for more facts or background. In any case, your role is to supply the information. You and your staff should be prepared to do this willingly and well. It pays handsome dividends.

Examine a news story in a daily paper. Take a wire story (AP or UPI) as your example, and notice how simply it is put together; notice the economy of writing; the short sentences, short paragraphs, simple words and simple constructions. These are basic requirements which you should emulate.

Try to tell the most important element of your story in the lead, or first paragraph. Think of it this way: if the paper had only one inch of space for your story, what would you say?

After the lead, you can elaborate the details in descending order of importance.
There used to be a rule in editorial rooms that a news story had to be a complete story at the end of every paragraph. That is a good way to think about the story as you write.

Keep your presentation simple: use typewriter, double space, and indent paragraphs. Use white paper 8 1/2 x 11-inch, one side only. Use mimeograph, multilith, thermofax, xerox. Do not send carbons. Use the standardized NPS News Release masthead paper if you have it, for the first page only of your release.

If you use standard letterhead paper, at the top of your page, list your park, your address, the name and phone number of the news source. Make it easy for the editor to call if he wants to talk about the story.

And never mark your story a "press" release. Radio or TV people are not "press," but they do deal with news. Call your offering a "news release."

Keep your release short. Don't ramble on with inconsequential matter or irrelevancies.

Keep your story to facts, never opinion or speculation. Never editorialize without attribution. For example, in a news release, do not say: "Bear feeding is dangerous both to the animals and the visitors. Violators of this park regulation will be vigorously prosecuted." Say, instead: "Superintendent Jones warned that bear feeding is dangerous both to the animals and the visitors. Violators of this park regulation, "he said", will be vigorously prosecuted."

Keep your language simple and active. Avoid bureaucratic words, cliches, repetition and slang.

The active form of a verb is preferred over the passive. For example: "Superintendent Brown greeted the Mayor's delegation at the Park entrance," not "The Mayor's delegation was greeted at the Park entrance by Superintendent Brown."

Recently, we sent each park, a copy of Rudolph Flesch's book "Say What You Mean" and a reprint of a recent Editor and Publisher article entitled "Fifty Common Errors of Newspaper Writing". Please share Flesch's book with those on your staff who write. The "Fifty Common Errors" article is incorporated as Appendix B of this handbook.

News should be attributed to a responsible, personal source. The National Park Service letterhead on the News Release is not an adequate source, nor is the vague, unidentifiable "Park Service Officials." Statements, announcements and decisions are made by people, who should be identified.
Remember your time element. A release prepared for a morning paper or a Sunday paper should not say "...it was announced today." Nobody gets up that early. The editor would probably catch it, but you should save him the trouble.

You may also want to say something about when you want your news story printed. If time of release is not important, simply mark it "for immediate release." Always put a date on your news release. If it is not for release on a specific date, put down the date it was prepared or distributed e.g. (For Immediate Release) (prepared 1/27/75).

When you've finished your draft, read it for understanding. Is it clear? or is it confusing? Think of yourself as a reader who knows nothing about the subject. Is it still clear and complete?

Be sure your copy is clean, without scratches, inserts or illegible erasures.

Some stories require a followup. For example, if you announce that crews are removing snow from park roads with a proposed opening date, you must follow up with another news release when your opening date is definitely known.

Remember, any time you change plans or schedules for some facility used by the public, you should let the people know in advance.

Normally, most of your news stories will be of local interest. Some items, however, are of broad and general concern, and should be released at the Regional or Washington level.

In most cases you should be able to tell immediately whether a story is of more than local interest. If it is the kind of news you would see in the state capital newspapers, it is probably of more than local interest. If you have any doubt, call the Regional Public Affairs Officer about it. Any news release can wait until you get it right.

Some stories won't wait, however--a disaster, for instance. These special cases will be discussed in a separate section.

The foregoing general rules hold for most stories. There are special considerations for stories involving juveniles, arrests, or court cases, discussed in the Law Enforcement section.

The Office of Public Affairs in Washington has prepared a style sheet that is to be followed on all news releases. The style sheet, with a sample news release attached follows:
OFFICE OF PUBLIC AFFAIRS
STYLE SHEET

News Releases

Release Time: Flush left, caps and lowercase, underlined:

For Release Monday, October 11, 1993

For Immediate Release

Author/Contact: Flush below "s" of "service" on standardized masthead, caps and lower case, with complete telephone number:

Andrews (202) 345-6789, x. 12

When appropriate, two contacts may be listed on one release because of the technical knowledge of one and the public affairs role of the other or because the regular contact may be unavailable when the release is issued:

Andrews or Bolling (202) 345-6789, x. 12

Andrews (202) 345-6789, x. 12
Wheelus (202) 987-6543

First names or initials may be indicated for contacts.

Heading/Title: Centered, all capital letters, underlined, restricted to a maximum of two lines, identifies content of release.

Copy: All double-spaced if the release is short; to conserve paper, longer releases should have first paragraph double-spaced, remainder of copy single-spaced with double spacing between paragraphs.

The first sentence in each paragraph must be indented, as in standard newspaper copy, NOT correspondence block form.

Words should not be broken at the end of a line. The only exception is for compound words which may be broken where a hyphen normally appears. For example: "turn-of-the-century attire will be worn by all participants."

Neither sentences nor paragraphs should ever be broken between pages of a news release.

End:

For releases longer than one page, the word (over) should be centered at the bottom of the first page if copy is printed on both sides of the paper. When copy is printed on one side only, the word (more) should be centered at the bottom of each page except the last. Copy should not be printed on both sides if the release exceeds two pages.

At the end of news release copy, a series of three to five X's should be centered with spaces between: X X X
Notes: Any special notes to editors should follow the closing series of X's.

If the news release is marked "For Immediate Release," the date of preparation should be indicated, flush right, at the bottom of the last page of the release: Prepared 3/3/77.

Speeches

When prepared for distribution to the media, speeches should be prepared like news releases. A release time should be indicated. Below the release time, flush left, the speaker, place, occasion, and date of the speech should be indicated, as:

For release 6 p.m., February 30, 1977

REMARKS BY JOHN SMITH, SUPERINTENDENT OF CALLABASH NATIONAL PARK, N.D., TO INTERNATIONAL ASSOCIATION OF BIRD-HATERS ANNUAL CONVENTION, BIRDLESS ISLAND, NEB.
February 30, 1977

"Birds in Our Lives" (quote Title)

No contact or additional heading should be listed on the printed speech. If desired, a covering news release may be issued with the speech to outline the highlights of the talk.

Speeches should be printed on both sides of the paper, with the pages numbered.

Speeches, and news releases derived from speeches, are the only items which should ever have a specific time of day indicated in the release time. Even this should be limited whenever possible and should only be used when premature disclosure in the media might detract from the news value of the speech in question.

General Rules of Style

Abbreviations in the names of organizations, addresses, etc., can save time and paper. These must, however, conform to standard style if they are to have meaning.

Do not use NPS until you have first used National Park Service. This serves to indoctrinate the reader and eliminate uncertainty on his part. Such acronyms should not have periods after each letter.

Abbreviate Street (St.), Avenue (Ave.), Boulevard (Blvd.), Terrace (Ter.), Drive (Dr.), and Road (Rd.) when used in complete addresses, but not otherwise. Thus, "he lives at 1600 Pennsylvania Ave.," or "he lives on Pennsylvania Avenue." Do not abbreviate such designations as Point, Port, Circle, Plaza, Place, or Lane.

Mount, Fort, Saint, and similar words may be abbreviated according to common local usage unless the legal name is spelled out in full. Thus, Mt. McKinley (as the mountain) is acceptable, but Mt. McKinley National Park (a corruption of the legal name) is incorrect and unacceptable.

III - 5
GENERAL RULES OF STYLE

Days of the week should be abbreviated only in tabular material.

Months of the year should be abbreviated only in tabular material or when used with a complete date. Thus, it is "On Oct. 12, 1966, the nation was . . ." and "In October 1966, the nation was. . ."

Abbreviations of generic park nomenclature should be avoided in public documents, including news releases. However, as these names constantly recur in internal correspondence and publications, the following standard abbreviations are acceptable for internal use:

| National Battlefield | NB | National Memorial Park | NMemP |
| National Battlefield Park | NBP | National Military Park | NMP |
| National Battlefield Site | NBS | National Monument | NM |
| National Cemetery | NC | National Park | NP |
| National Historical Park | NHP | National Recreation Area | NRA |
| National Historic Site | NHS | National River | NR |
| National Lakeshore | NL | National Scenic Riverway | NSR |
| National Memorial | NM | National Seashore | NS |

For the few other classifications found in the National Park System, abbreviations should generally be avoided. When referring to several units in the same class, the plural form of the abbreviation should not be used. For example, "He has served at Yellowstone, Yosemite, and Grand Canyon National Parks," not "NPs."

Punctuation

Commas should follow, as well as precede, the year in a complete date used in a sentence or a state name used as a part of a location in a sentence. For example: "On April 18, 1775, Paul Revere of Boston, Mass., rode his horse. . ."

Commas should NOT be used between the month and year when a complete date is not used. It should be "in October 1966," not "in October, 1966."

Quotation marks are preferred to underlining when identifying titles of motion pictures, publications, or speeches. If such titles are used in the heading of a news release, single quote marks should be used, in the body of a release follow standard rules of grammar with double quote marks preferred.

Names and Titles

Avoid over-long prefatory titles. Secretary of the Interior John Jones, Solicitor John Jones, and a few others are all right. It should be Director John Jones of the National Park Service, not National Park Service Director John Jones. Titles are upper case only when they precede a name. Thus it is Superintendent William Brown of Yellowstone National Park or William Brown, superintendent of Yellowstone National Park. If the person
GENERAL RULES OF STYLE

identified has a degree which should be acknowledged, his title should follow his name: Dr. Sam Smith, Bureau of Mines director.

Titles should be kept as short as possible, for they often mean little to the reading public and excess verbiage simply wastes time and paper. Therefore, John Jones, National Park Service Western Regional director, or -- if the context makes his agency clear -- simply "John Jones, Western Regional director, today announced a new National Park Service policy on tree-climbing . . ."

Use of Mr. should be avoided in stories as too often we find the same story has one party identified as "Mr." and another not so recognized. Use "Dr." if a person holds such a degree and has not clearly indicated he prefers not to have it used. Thus, if the first reference is to Dr. Sam Smith, Bureau of Mines director, the second should be either Dr. Smith or Director Smith. If he does not hold such a degree, the second would be either Smith or Director Smith. Generally, however, the repetition of titles is unnecessary in a short release and second references would be to Dr. Smith or Smith, as appropriate. In a longer piece, particularly when a new reference is made on a second page, repetition of the title, Director Smith, is correct.

Never abbreviate a person's first name unless he prefers that usage. It should always be William A. Brown, not Bill Brown or W. A. Brown if you are not certain of his preference (and many people prefer the formal approach when their names are used in print, even if they don't otherwise).

Figures, Dimensions, etc.

Except when dealing with finances and ages, the general rule is to spell out numbers below 10 and to use figures for 10 and above:

A five-pound fish, a 10-pound fish; a 3-year-old girl; a $4 million contract; 1,498 acres of land; six acres of land; a $5 fee; 1,367,500 visits recorded.

Do not mix measurement standards in the same story, leaving your reader to compare pounds of sand and kilograms of cement. When metric system measurements are used, give comparative figures in U. S. measure.

Use either decimals or fractions when discussing similar items, do not mix them. For example, "91.75 acres of Federal land were exchanged for 107.5 acres of the Garth Ranch," or "91 3/4 acres of Federal land were exchanged for 107 1/2 acres of the Garth Ranch," but never "91.75 acres of Federal land were exchanged for 107 1/2 acres of the Garth Ranch."

Capitalization

Generally, capitalization should be kept to a minimum. However, it is traditional that references to the body politic of the United States are capitalized; i.e., Federal agencies, Government property, etc. References to other levels of government are not capitalized, however, thus making it "property currently administered by a variety of Federal, state and local agencies. . .," and "leaders of the city government met with park officials to discuss the transfer to Federal ownership. . ."
GENERAL RULES OF STYLE

State Names

State names following the names of cities, towns, villages, national parks, Indian agencies, etc., may be abbreviated in news release copy only as follows (do NOT use the Postal Service's abbreviations):

<table>
<thead>
<tr>
<th>State</th>
<th>Abbreviation</th>
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<td>Ala.</td>
<td>Ga.</td>
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<td>Ariz.</td>
<td>Ill.</td>
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<td>Ark.</td>
<td>Ind.</td>
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<td>Calif.</td>
<td>Kan.</td>
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<td>Colo.</td>
<td>Ky.</td>
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<td>Conn.</td>
<td>La.</td>
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<td>Del.</td>
<td>Md.</td>
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<td>Fla.</td>
<td>Mass.</td>
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<td>Mich.</td>
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<td>N. C.</td>
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<td>Okla.</td>
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<td>Ore.</td>
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<td>Pa.</td>
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<td>N. H.</td>
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<td>S. C.</td>
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<td>Tenn.</td>
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<td>Tex.</td>
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<td>Va.</td>
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<td>Wash.</td>
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<td>W. Va.</td>
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Do not abbreviate Alaska, Hawaii, Idaho, Iowa, Maine, Ohio, Utah, American Samoa, Canal Zone, Guam, or Trust Territory of the Pacific Islands.

Virgin Islands (V.I.) and Puerto Rico (P.R.) may be abbreviated only on a second reference. On first reference, they must be spelled out in full.

State names should never be abbreviated when they stand alone in a sentence. For example: "He lives in Nashville, Tenn., and vacations on the Georgia seacoast."

Names of foreign nations are almost never abbreviated. The only common exception is U.S.S.R. (for Union of Soviet Socialist Republics; "Russia" is not the proper name of the nation).

Locations

As news releases are supposed to be duplicated on letterhead paper which clearly identifies the location of the originating park or office, it should not be necessary to indicate the state or territory in which the office is located in a reference in the text of the release. Therefore, a release on a standardized masthead which includes the address of Yellowstone National Park need only say "Jack K. Anderson, superintendent of Yellowstone National Park, today announced . . ." If, however, the same release refers to a park unit not indicated on the pre-printed paper, standard references shall be made: "Anderson noted that Grand Teton National Park, Wyo., is also participating in the program."

For public use, you must assume that at least one member of your readership has, until that moment, never heard of any unit of the National Park System outside of his home state of Delaware (where there are no units of the National Park System). For internal use, however, it is not necessary to identify the state when referring to long-established, well-known NPS areas such as Acadia, Grand Canyon, Yellowstone, or Yosemite National Parks.
GENERAL RULES OF STYLE

Politics

Elected officials are seldom mentioned in NPS news releases. However, when called for, it should be done according to certain basic rules of protocol. This is not a political agency and we do not recognize, in print, the political affiliations of anyone mentioned in our news releases.

Generally, standard form uses the official's elected title before his name, with the area represented following the name: Senator Aaron Ashburn of Arizona (a U.S. Senator); State Senator Brenda Brown of Phoenix, Ariz. (a State Senator); Representative Carl Collins of Colorado (or, if you prefer, of Colorado's Ninth District); Mayor Daniel Dickson of Dover, Del.

Members of Congress should always be identified as Senator Samuel Smith or Representative Ronald Ross, NOT Congressman Smith or Congressman Ross unless that title is specifically preferred by the Member of Congress who is being identified.

If more than one elected official is mentioned in the same news release, as in the announcement of a dedication program, for example, it is usually best to list them by order of appearance in the formal program or by identifying the featured speaker first, then reverting to order of appearance. If the program has not yet been set when it is necessary to issue the release they should be listed in order of relative importance -- at best a difficult task.
For Immediate Release

NATIONAL PARK SERVICE SWITCHES TO NEW STANDARDIZED MASTHEAD PAPER

Superintendent Wilson Smythe of Bureaucratic National Park today announced that the National Park Service (NPS) has adopted a new standardized masthead paper for news releases issued by its parks and offices nationwide.

Smythe pointed out that the new paper will give NPS releases a more professional appearance and provide a uniformity which will help news editors and writers instantly recognize all NPS releases regardless of the originating office.

To establish uniformly high standards of news distribution from all NPS units, Smythe said, a new "Style Sheet," detailing the basic standards each office should follow in preparing news releases, has been issued to each NPS office.

"Bureaucratic National Park," the superintendent said, "like the other NPS units, will adapt the new masthead paper to suit its own needs by adding the park's name and mailing address on the bottom of the new paper, using the same 'Jay Gothic' type used for the head. This will permit us to conform to the Service-wide standard while clearly maintaining the individual identity of news releases issued by Bureaucratic National Park."

The new paper will be used only for the first sheet of those releases which go beyond one page, he noted, but the park will conserve paper by single-spacing copy when that will reduce the number of pages required for a particular release.

Smythe said he hopes the new paper and guidelines will encourage his public affairs officer to make greater use of news releases than he has in the past, noting that the park has seldom issued more than 5 releases in recent years.

EDITORS: Additional sample copies of the new standardized NPS news release masthead will be sent upon written request to the address below.

SAMPLE COPY ONLY

Prepared 4/29/74
IV

FREEDOM OF INFORMATION
FREEDOM OF INFORMATION

The original Freedom of Information Act became law on July 4, 1967, and after seven years experience with its operation, the Congress, in 1974, enacted, over the President's veto, several tough new amendments, which became effective on February 19, 1975.

The amendments changed the Act in six important areas:

1. It established statutory time limits for response to a Freedom of Information request - 10 working days from receipt of the original request, and 20 days for a decision on an appeal. An additional 10-day extension (total time) may be used in certain "unusual circumstances" but not for each one. We are required to inform the Department if any of the 10-day extension period is used on an initial request, as this is subtracted from potential extension time available for the appeal period. If a requester does not receive a reply within 10 working days, he may consider his request denied and go directly into U.S. District Court to sue for the information.

2. It provides for sanctions against a Government official, if a Federal judge determines that he acted in "an arbitrary and capricious manner" in withholding information. Disciplinary action could include suspension without pay. This need not happen if Park officials follow the procedures outlined in these pages.

3. The first and seventh statutory exemptions to the Act were modified and narrowed. The first exemption pertains largely to national defense matters and does not directly concern us, but the seventh exemption, pertaining to investigatory files, does concern the National Park Service and the U.S. Park Police.

Since it is hard to establish explicit guidelines here, we suggest you check with the Public Affairs Officer, Western Region, on a case-by-case basis until a clear pattern is developed.

4. The Act establishes a uniform fee schedule which is discussed elsewhere on these pages. Accurate records must be kept on all fees charged.

5. The Act requires an annual report to Congress on all denials, due on March 1 of each year. Details will be found in both the text of the amended Act and Departmental guidelines, both of which are included in this section.

6. The amended act provides for partial disclosure. If part of the requested material is exempt and part is not, "any reasonably tangible material shall be separated from the exempt material." No charge may be made for the separation process.

Attached are several documents pertaining to the FOIA, all of which you have received piecemeal in the past. Attached are:
Guidelines in non-technical language and question and answer form, prepared by the Department of the Interior to assist FOIA officers at the field level in handling requests.

The text of the FOIA, as amended, with amendments underlined.

Departmental regulations for implementing the FOIA, as published in the Federal Register on February 19, 1975, the effective date of the Amended Act.

Departmental regulations establishing a uniform fee schedule for reproduction of requested material. Note that this is an interim regulation expiring November 30, 1975, but it must be followed by all Department of Interior agencies unless and until it is revised.

U.S. Civil Service Commission Bulletin No. 294-1: "Requests Received by Agencies for Information Contained in Reports of Investigation conducted by the U.S. Civil Service Commission.

The Departmental Q and A Guidelines should answer most of your questions. However, if you are in doubt, check with the Public Affairs Officer, Western Region, who is designated as the primary contact for Freedom of Information matters within the Western Region. In view of the statutory deadline for response (10 days on the initial request) you should consult by telephone if you are in doubt on a specific request, rather than relying on the mails.

It should be emphasized that neither the FOIA nor the Departmental regulations automatically forbids disclosure of material fitting into the exempt categories, unless its disclosure is specifically prohibited by another law or an Executive Order. Other material identified as being in an exempted category may be withheld only if sound grounds exist for doing so. A letter denying access must specify the exemption plus either the law or the Executive Order prohibiting disclosure, or the sound grounds for denying public access. It also must identify the individual or individuals involved in the decision to withhold, and must inform the requester of his rights to appeal within 20 days to the Assistant Secretary of the Interior for Program Development and Budget in Washington, D.C.

LIST OF THE NINE EXEMPT CATEGORIES

Statutory exemptions. The Act exempts nine categories of records from this disclosure requirement. All other official information of the National Park Service is in the public domain and is to be made available to any person upon request. The Act provides that disclosure is not required of matters that are:

1. Specifically authorized under criteria established by an Executive order to be kept secret in the interest of national defense or foreign policy and in fact properly classified pursuant to such Executive order;
2. related solely to the internal personnel rules and practices of an agency;

3. specifically exempt from disclosure by statute;

4. trade secret and commercial or financial information obtained from a person and privileged or confidential;

5. inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;

6. personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;

7. investigatory records compiled for law enforcement purposes, but only to the extent that production of such records would (i) interfere with enforcement proceedings, (ii) deprive a person of a right to a fair trial or an impartial adjudication, (iii) constitute an unwarranted invasion of personal privacy, (iv) disclose the identity of a confidential source and, in the case of a record compiled by a criminal law enforcement authority in the course of a criminal investigation, or by an agency conducting a lawful national security intelligence investigation, confidential information furnished only by the confidential source, (v) disclose investigative techniques and procedures, or (vi) endanger the life or physical safety of law enforcement personnel;

8. contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or

9. geological and geophysical information and data, including maps, concerning wells.

March 1975
By following a few simple procedures, we should be able to comply with both the spirit and the letter of the FOIA without a great deal of difficulty. They include:

* Careful logging of FOIA requests and prompt attention to them. Because of the new statutory deadlines, FOIA requests should receive the highest possible handling priority by all personnel in the Service, especially in the mail rooms.

* Prompt consultation with the Regional Public Affairs Office on doubtful cases.

* It should be re-emphasized that no Freedom of Information requests within the Western Region are to be denied without prior clearance by the Regional Public Affairs Officer.

* Accurate records must be kept on fees collected for reproducing documents under FOIA as an annual report must be made to the Congress. Note that all checks or money orders are to be made out to "The National Park Service" (do not use the letters "U.S.") and that receipts are to be credited to Receipt Account Symbol 142419. 2. The Departmental regulations (attached) provide that in some instances, waiver of fees is mandatory. In others, it is optional, e.g. "costs may be waived or reduced, as appropriate, if the official making the records available determines that furnishing the records can be considered as primarily benefitting the public as opposed to the requester." Departmental regulations do not establish a minimum fee, but common sense dictates that the fee be waived if the cost of collection exceeds the amount collected.

* For continuity and consistency, each field area shall designate a Freedom of Information Officer, including an alternate to act in his/hers absence.

Please contact the Regional Public Affairs Officer if you have any questions on the Freedom of Information Act as amended.
Guidelines, in question and answer form, prepared by the Department to assist the field in handling FOIA request follow:

Q. What must I know about Freedom of Information?

A. The Freedom of Information Act (FOIA for short) since 1967 has required the Government to make available to "any person," upon request, its records unless the item falls into one or more of nine defined categories of exemptions. Amendments passed in 1974 require such requests to be decided upon within 10 business days after receipt, and the requester must be notified of the decision immediately. If a request is denied in whole or in part, the denial must be put in writing; explain the reasons; list the person(s) responsible for the denial; and explain how it may be appealed.

Q. Does the Interior Department have regulations, and a policy on FOIA?

A. The regulations are spelled out in 43 CFR, Subtitle A, Part 2, published in the Federal Register February 19, 1975. The Department's policy is defined in the regulations as "to make the records of the Department available to the public to the greatest extent possible, in keeping with the spirit of the Freedom of Information Act."

Q. Must all inquiries now be handled in a strictly formal manner?

A. Most inquiries are informal and do not invoke FOIA. Routine inquiries should continue to be handled informally and as promptly as possible, whether received in writing or by word of mouth. Every normal, reasonable effort should be made to accommodate requests for information about the government.

Q. What constitutes a request under FOIA?

A. To invoke the Act under Interior regulations, a request must be in writing, and must reasonably describe the record(s) sought. A reasonable description is one that enables an Interior employee who is familiar with the subject area to locate the record with a reasonable amount of effort. (If the description fails to meet the test, and the request must be denied for that reason, the written denial must say so and, as much as possible indicate what further description would help in finding the record.)

Q. Does an FOIA request have to be labeled as such?

A. A request cannot be disqualified for failure of the sender to label it as such, but he may lose valuable time. The Department's regulations require that a request be marked "FREEDOM OF INFORMATION REQUEST" both on its face and on the front of the envelope containing it. If it is not so marked, the 10-day time period will not begin to run until Interior personnel have identified it as an FOIA request and marked it as required. If you receive an unmarked communication which you identify as an FOIA request, you must
then mark it immediately "FREEDOM OF INFORMATION RE-
QUEST" and that day's date, and take steps to assure it is prop-
erly handled.

Q. Must a request specify the amount of fees the requester is willing to pay for records search and copying?

A. The regulations so require. If the number of pages to be search-
ed for and copied is small, a failure to specify such a figure should not be an obstacle. If the responsible official expects the costs may exceed $25, the requester's failure to list what he is willing to pay will delay the running of the time limit and pro-
cessing of the request until the requester agrees to pay the es-
timated fee. (The regulations provide for reduction or waiver of fees if the request involves furnishing records to the news med-
ica for dissemination to the general public, or if furnishing the records can be considered of primary benefit to the public and not just the requester.)

Q. What about requests for "all the records on X" or "all the corre-
spondence on Y?"

A. Requests for whole categories of records must be processed if (1) it can be determined which particular records the request covers, and (2) the records can be searched for, collected, and produced without undue burden or interference with Interior operations because of staff time consumed or disruption of files.

Q. How should we handle a categorical request that does not meet these tests?

A. It must be denied in writing, specifying the reasons why. The written denial must offer the requester an opportunity to confer with knowledgeable Interior personnel to change the request so that it can be processed.

Q. What if the request is received in an office that doesn't have the record(s)?

A. It should be referred immediately to the appropriate office, and hand-carried if feasible. If you are uncertain where it belongs, ask your supervisor for help, or consult a public information officer. If a request must be referred to another installation, the requester must be so notified in writing. If a part of the request can be answered by your office, you should immediate-
ly forward a copy or copies to those offices which have the records that are not in your possession, and get to work on your part of it.

Q. Just how serious is the time limit?

A. If the decision is not made within 10 days (excepting Saturdays, Sundays, and legal public holidays), the requester may go direct-
ly to Federal court and seek an order requiring that the records be made available. For this reason, it may be worthwhile to assign responsibility to one person at your installation for seeing that requests are processed promptly.

Q. When does the time limit begin to run?

A. When the request is received at the mail room of (1) the installation where the records are located, or (2) the office of the head of the Bureau, or (3) the office of the Bureau's chief public information officer. If the requester sends it to the wrong Bureau or installation, the time begins to run when it is received in the proper place.

Q. What about records that do not exist at the time the request arrives?

A. The Department is not required to consider requests for such records, even if there is every reason to believe the records will be created at some future time. Nor is the Department required to create records by combining or compiling already existing items from its files, or by preparing a new computer program, or by providing proportions, percentages, etc. As a matter of administrative discretion, however, these things may be done.

Q. Tell me more about the nine exempt categories.

A. The nine exemptions are listed in this leaflet, but remember: neither the law nor the regulations forbids disclosure of material fitting into the exempt categories. In fact, exempt material may be withheld only if (1) its disclosure is prohibited by another law or an Executive Order, or (2) sound grounds exist for withholding it. A letter denying access must specify the exemption plus either the law or Executive Order prohibiting disclosure, or the sound grounds for denying public access.

Q. What if a request is made for an item that contains material which must be disclosed, along with exempt material which should be withheld?

A. The item must be released in edited form which will disclose everything but the exempt material which should be withheld--even if it does not appear to make sense in that form. Also, the requester must be sent a letter explaining the reasons for denying access to the withheld material; listing the person(s) responsible for the denial; and explaining the appeal process.

Q. Who makes the decision to release or deny material?

A. A decision to release may be made by any employee if exempt material is not involved. If exempt material is involved, a decision on whether to release or withhold material may be made (1) in the field, by the head of the installation or by a higher authority so designated in writing by the Bureau director, or (2)
at headquarters, by the Bureau director or an official whom he has so designated in writing.

Q. Isn't consultation required before a decision to deny access to an item?

A. Yes; the decision-maker must consult with an appropriate member of the Solicitor's Office; in addition, consultation with a public information officer is strongly recommended.

Q. What if it takes longer than 10 business days to find the records, consult, and make a decision?

A. The responsible official must nevertheless continue to process the request. Extensions of time are possible: (1) The requester may grant an extension until an agreed-upon date with no loss of his appeal rights. (2) Authorized decision-makers within Interior Bureaus may extend the time, but only for a maximum of 10 business days beyond the initial period, AND only if one or more of three unusual conditions prevail as set forth in Section 2.16 (c) of the regulations. The requester must be notified in writing of the extension, listing the reasons. (3) It is also possible for a court to grant an extension under special circumstances.

Q. If the requester agrees to grant a time extension, is the word-of-mouth agreement sufficient?

A. To protect all parties concerned, the discussion should be followed up with a letter to the requester, confirming the spoken agreement. One copy should be kept in the case file, and one should be sent to FOIA Officer, Office of the Assistant Secretary--Program Development and Budget.

Q. What fees are we authorized to charge?

A. Section 2.19 of the regulations describes services for which fees may and may not be charged, and conditions under which fees may be waived or reduced. Appendix A of the regulations, published in the Federal Register for February 20, 1975 (pp. 7449-7450) contains the fee schedule. The basic fee for making photo-copies is 25 cents for the first page and 5 cents for each additional page.

Q. How does a person appeal a denial of his request, or a failure to meet the time requirements?

A. An appeal must be received within 20 business days after the date of the denial or of a failure to meet the time requirement. It must bear the words "FREEDOM OF INFORMATION APPEAL" on its face and on the envelope. It must attach copies of the initial request and of the initial denial. To expedite the process, it should also contain a brief statement of why the requester believes the initial denial was in error. It must be addressed to Freedom of
Information Act Officer, Office of the Assistant Secretary-Program Development and Budget, U. S. Department of the Interior, Washington, D. C. 20240. A decision normally must be made within 20 business days after receipt. It is made by the Assistant Secretary following consultation with the Department's Solicitor, the Director of Communications and the Program Assistant Secretary. An appeal that is misdirected or improperly marked must upon recognition be marked, logged in and redirected immediately.

Q. I've read this leaflet and I still have a problem. What now?

A. First, obtain a copy of the regulations and read carefully. If still in doubt, consult with the Solicitor, or with a public information officer, or both, without delay.
V

LAW ENFORCEMENT, CRIME AND DISASTERS
LAW ENFORCEMENT, CRIME AND DISASTERS

This is an area of great sensitivity and importance. The manner in which you handle news relating to crime and disaster can do much to strengthen your relations with news media. At the same time, a single incident, badly handled, can create distrust and suspicion that destroys years of patient effort in building an effective relationship with newsmen.

Of necessity, great discretion must be vested in the Superintendent and there are few specific guidelines that apply Service-wide to all types of situations. There is one overriding principle you should keep in mind, however, and that is this:

When crime or tragedy occurs in an area of the National Park System, the public has a right to know about it, and they get their information through the various media--newspapers, radio and television, who, in turn, get their information from you.

You should be aware of the fact that the Freedom of Information Act, as amended, applies to this type of information also. The changes in the law regarding access to investigatory files are discussed in detail in the section dealing with that subject.

There are several valid reasons for publicizing law enforcement activities within the parks. It can serve as a deterrent to further violations. It can alert the public to potential danger, enlisting their support and enabling them to take protective measures, if necessary. It can reassure the residents of the area that the National Park Service is effectively carrying out its visitor protection and law enforcement program.

What follows are some general guidelines on procedure in certain areas. Not all are applicable to every situation. If a situation arises in which you are in doubt, consult the Regional Public Affairs Officer. Both office and home phone numbers for key public affairs officers are listed in this booklet.

ACCURACY: It is always important to have your facts straight in any news release, but doubly so in cases involving crime or tragedy. Names, addresses, and ages should be checked and cross-checked for accuracy. If a crime is involved, be specific as to the charge. Do not editorialize or moralize. And above all do not speculate or assume anything. Report only facts.

JUVENILES: The name of a juvenile should not be mentioned in a news release--either at the time of arrest or after disposition of the case. The only exception would be if a juvenile commits a major crime, is a fugitive, and the information would be useful in his apprehension.

The legal definition of a juvenile varies from state to state and each Superintendent will know the age limit for his area.
Under the Federal Juvenile Delinquency Act no investigative files or documents or other information relating to a juvenile proceeding are to be disclosed.

These provisions were strengthened by the Runaway Youth Act of 1974 (P.L. 93-415). The section of that Act pertaining to Juvenile Records is reproduced verbatim as follows:

**JUVENILE RECORDS**

Sec. 508. Section 5038 is added, to read as follows:

"§ 5038. Use of juvenile records

(a) Throughout the juvenile delinquency proceeding the court shall safeguard the records from disclosure. Upon the completion of any juvenile delinquency proceeding whether or not there is an adjudication the district court shall order the entire file and record of such proceeding sealed. After such sealing, the court shall not release these records except to the extent necessary to meet the following circumstances:

(1) inquiries received from another court of law;
(2) inquiries from an agency preparing a presentence report for another court;
(3) inquiries from law enforcement agencies where the request for information is related to the investigation of a crime or a position within that agency;
(4) inquiries, in writing, from the director of a treatment agency or the director of a facility to which the juvenile has been committed by the court; and
(5) inquiries from an agency considering the person for a position immediately and directly affecting the national security.

Unless otherwise authorized by this section, information about the sealed record may not be released when the request for information is related to an application for employment, license, bonding, or any civil right or privilege. Responses to such inquiries shall not be different from responses made about persons who have never been involved in a delinquency proceeding.

(b) District courts exercising jurisdiction over any juvenile shall inform the juvenile, and his parent or guardian, in writing in clear and nontechnical language, of rights relating to the sealing of his juvenile record.

(c) During the course of any juvenile delinquency proceeding, all information and records relating to the proceeding, which are obtained or prepared in the discharge of an official duty by an employee of the court or an employee of any other governmental agency, shall not be disclosed directly or indirectly to anyone other than the judge, counsel for the juvenile and the government, or others entitled under this section to receive sealed records.

(d) Unless a juvenile who is taken into custody is prosecuted as an adult—

(1) neither the fingerprints nor a photograph shall be taken without the written consent of the judge; and
(2) neither the name nor picture of any juvenile shall be made public by any medium of public information in connection with a juvenile delinquency proceeding."
PRE-TRIAL PUBLICITY: When the suspect in a major crime (felony) committed in a Park area is arrested, formally charged and taken into custody, this information enters the public domain and becomes a part of the public's right to know. This does not mean that the Superintendent should rush to the media with an announcement, although there will be times when this is both proper and necessary. But it does mean that the information must be made available upon request, to a bona fide news representative. There may be times when this information must be withheld temporarily—for example, when additional arrests are imminent and premature disclosure would jeopardize closing out the case. In the vast majority of such incidents, however, National Park Service personnel will be working with other law enforcement officials and should be guided by their procedures.

There may be other instances when "pre-trial" publicity is both necessary and desirable. Announcement of an arrest, or arrests, may call public attention to a bad local situation and deter commission of the same type of crime by others during the period in which defendants are awaiting trial. In some instances, the prosecuting attorney will expect to be consulted prior to the release of information to the media. He will also be aware of any decisions by the court concerning release of information. When in doubt, he should be consulted first. However caution must be exercised not to jeopardize the case by biased releases.

But if names are used in pre-trial stories, you must take great care to make it clear that the persons involved have been accused, but not convicted. For example, say:

"John Jones is awaiting trial on charges of alligator poaching", NOT "John Jones is awaiting trial for alligator poaching."

Extreme caution must be exercised in release of pre-trial information about sex crimes. For example, the names of rape victims or complaining witnesses in cases of homosexuality or perversion must not be released. Because of the stigma attached to such an accusation and the lasting harm to a reputation that would result should the charge prove unfounded, great care must be taken in identifying the suspect and in releasing details of the alleged offenses.

Media policy on sex crimes varies widely. It is important for all National Park Service personnel, however, to remember at all times that until the trial has been concluded, the guilt or innocence of the accused has not been legally determined.

DISPOSITION OF COURT CASES: Superintendents, in their discretion, may find it useful in the overall interests of law enforcement to issue general news releases at the close of a court session. These may be just summaries of the types of charges or offenses; number of convictions, fines, and other penalties imposed. The names of adults involved and the details of the offenses need not be included, unless, in the judgment of the Superintendent, it would serve as a deterrent to
future violations, or it is a logical followup to a case that was widely publicized earlier. However, once a case is formally disposed of, it becomes a matter of public record, and must be supplied, upon request.

In no instance, should the details of such a case be voluntarily publicized solely as a means of inflicting additional punishment upon the defendant, or indicate in any way a criticism of the fine or penalty imposed.

FATALITIES: In all cases of fatalities occurring in an area of the National Park System, it is the policy of the Service that next of kin be notified before the identity of the victims is given to news media. Superintendents occasionally may find themselves under great pressure from reporters to violate this policy, but such pressure must be resisted. The only exception would be when, after a suitable interval, the Superintendent determines it necessary to enlist the help of the media in locating relatives whose whereabouts are unknown.

DISASTERS: On those rare occasions when a major catastrophe or disaster strikes an area of the National Park System, Superintendents will find themselves overwhelmed by the demands of the news media for timely, accurate information. For many reporters, this is their first and only contact with the National Park Service.

Much confusion and irritation on both sides can be avoided with a little advance planning.

A key step is the designation, in advance, of a Park Information Officer to correlate information, brief the media, and release all statements for publication. All personnel likely to come in contact with the press should know who the Park Information Officer is and the general procedures to be followed.

Generally, the Park Information Officer should not be the Superintendent because he or she will be too heavily involved, personally, in coping with the situation in the field.

The first requirement of a Park Information Officer is that he or she be available to the press, preferably by phone at Park headquarters; the second, that he or she be responsive.

When an emergency occurs and the calls start coming in from the media, never say "No comment." This is a red flag to any newsman. It's much better to say: "I don't know, but I will check it out and call you back." You aren't expected to know everything about a rapidly changing emergency situation.

It is important that you keep a record of your press queries, and return the calls as soon as you have the facts in hand. Don't wait for the reporter to call you back. Remember that the reporter also is working under great pressure and usually in a competitive situation.
But before you do return the calls, organize your facts and get your ducks in a row as best you can. A simple, written statement is helpful because it insures that you tell the same story, and the complete story, to all the reporters.

On occasion, it may be necessary to bring in the Regional Public Affairs Officer for assistance. It is to the advantage of both the Park and the reporters that there be a single, authoritative and knowledgeable news source.

The foregoing does not mean, however, that a gag be placed on all National Park Service personnel and that they be prohibited from talking to reporters on the scene regarding background material, etc. The rule of common sense, backed up by advance knowledge of procedures, will be most effective.

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VI

CHESHIRE SYSTEM
The Western Regional Public Affairs Office has arranged with GSA for a mechanized mailing service for news releases, (or other bulk mailing, e.g. master plans, DCP's, etc.) that has Region-wide application. This system also may be used selectively by individual Parks to cover their circulation areas for an extremely modest fee.

Drawing upon various sources, the Public Affairs Office has compiled a list of some 1000 media outlets in the Western Region, consisting primarily of daily and weekly newspapers, radio, television stations, organizations and individuals. The Public Affairs Office updates the list--making corrections, additions and deletions--continually. This basic list is further broken down into the following categories:

1) All daily and weekly newspapers, radio and TV stations in the State of Arizona.
2) All daily and weekly newspapers, radio and TV stations in the State of Nevada.
3) All daily and weekly newspapers, radio and TV stations in the State of Hawaii.
4) The California list is broken down into the following five regions of the State:
   b) Northern California - all media outlets north of Napa, Sonoma and Yolo Counties' north boundary and north of I-80.
   c) Central California - includes that area south of the Bay Area and I-80 and to the eastern edge of the State, then south just east of US-6 and 395 to China Lake, then along the east edge of Kern Co., then west along the north boundaries of Los Angeles, Ventura and Santa Barbara Counties.
   d) The metropolitan Los Angeles area - Santa Barbara, Ventura, Los Angeles, and Orange Counties.
   e) Southern California - all the area east and south of the Central California area and Los Angeles area.

Each of the five categories for California listed above is further broken down into 2 divisions.

1) weekly newspapers.
2) daily newspapers, TV and radio stations.

The list may be used in its entirety or in any combination of its separate, coded components.
You can order the service in either of the following ways:

1) addressing service for franked envelopes only, or gummed address labels.
2) camera-ready typing of copy, reproduction, stuffing, addressing and mailing.

The cost of self-adhering, peel-off labels is one cent (1 c) per label, with a $2.50 minimum charge. The charge for a complete duplicating, processing and mailing service depends on the quantities involved. For example: A news release mailed to 630 addresses, plus 270 additional flat copies of the release cost $33.85; a release mailed to 100 addresses costs approximately $10.00.

If you want to use this service, provide the Public Affairs Office with your park account number and order. This may be done either by telephone or memorandum, but if you telephone, your order and account number must be confirmed in writing in a follow-up memorandum.

Two singular advantages of this system are that it eliminates the costly, time-consuming and laborious hand-addressing of envelopes and it provides comprehensive coverage of all major media outlets in your circulation area at a modest cost.

Since it is not possible to get one-day service from GSA except on a premium, overtime basis you may wish to order one or more sets or envelopes or gummed stickers in advance so you will have them when needed. If you prefer envelopes, please send the Public Affairs Office the required number that bear your own return address.

On a complete job - i.e., typing final copy, printing, addressing and mailing, give the Public Affairs Office at least one week lead time.

If you have any questions about the Cheshire system, please contact the Regional Public Affairs Office for further details.
VII

PUBLIC INVOLVEMENT
PUBLIC INVOLVEMENT

The National Park Service today is committed to a policy of public involvement—a sharing of the decision-making process with the public.

The goal of the Service is to make the National Park System truly responsive to the needs of the American people as we carry out our basic mission of managing the superlative natural, historical and recreational resources that have been entrusted to our care.

To accomplish this, the Western Region of the Service is making a major effort to open the full range of its policy-making, planning and management processes to the public view.

Since 1969, the Service has been holding public meetings on proposed master plans for parks, securing public reaction and comment before the document is approved in final form. New guidelines for superintendents, developed in 1974, provide for involving the public at an even earlier stage of the decision-making process through public workshops that precede drafting of the master plan.

The policy of early public involvement has been extended to other management programs in which the public has a vital interest, such as back country and natural resource management plans. All major developments, including park-wide plans, are submitted to the public for comment and review and possible modification before being implemented.

Efforts are being made to involve not only special interest groups and other governmental agencies at the State and local level, but also the broadest possible spectrum of park visitors and other concerned citizens.

Media relations plays a vital role in our public involvement programs. Therefore, please refer to the Guidelines that follow whenever you are developing materials for the mass communication media that relate to planning and/or major changes in park management programs.
Guidelines for Preparation and Conduct of Public Meetings

1. Coordination: The Office of Public Affairs will have line responsibility for coordinating the scheduling and conduct of all public meetings covered by the subject areas defined below. The Public Meetings Coordinator will be responsible for keeping the Regional Office and Washington headquarters informed, in a timely manner, on the significance and scheduling of such meetings. It will be a joint responsibility of the concerned field area, the Regional Coordinator and the Denver Service Center to meet established deadlines.

2. Subject Areas to be Covered: Since 1969, it has been Service policy that public meetings be held on Master Plan proposals before the final draft is submitted to Region for review and approval. This policy will be continued. In addition, Superintendents will be required to hold work­shops on alternatives to obtain public input before the Master Plan Team prepares the preliminary draft.

Also, public meetings will be held on all proposed Development Concept Plans, all other significant proposals, such as back country management plans, concessioner developments, major changes in transportation or traffic systems, etc. that have a direct impact on visitors - along with the accompanying Environmental Impact Statement or Environmental Assessment - unless otherwise determined by the Regional Director.

When the initial draft of a plan (other than Master Plans and DCP's) is submitted to the Regional Office for review, the superintendent, or the head of an office submitting the plan, will, by separate memorandum, recommend the manner in which the plan should be made available for public review. This could range from only announcing availability of the plan for public review at park headquarters through the medium of a news release, to formal public meetings herein described. The recommended course of action shall be accompanied by justification.

The Public Affairs Officer will have responsibility for coordinating review of this recommendation in the Regional Office prior to submission to the Regional Director. Therefore, this separate memorandum should be addressed to Regional Director: Attention: Public Affairs Officer.

If the decision is to hold a public meeting, line responsibility for scheduling and conduct of such meetings will be handled by the Office of Public Affairs, as set forth in Item 1 Coordination, above. The Regional Public Meetings Coordinator will be responsible for communicating such decisions to the concerned field area or office.

3. Advance Notice: The time, date, location and purpose of public meetings should be publicized well in advance, through all available media. This should be done a minimum of 30 days prior to the meeting, with a follow-up news release one week in advance. The news release (see attached Exhibit I) should be sent to all media serving the area. The news release should be supplemented by personal letters of invitation to concerned organizations and individuals, including appropriate Government agencies and/or officials at all levels local, county, State and Federal. (see attached Exhibit II).
If a legal notice is required, or deemed necessary, it should follow the format of the attached Exhibit III, which also provides instructions for the publication and affidavits required for the record. A legal notice is required when an Environmental Impact Statement or Environmental Assessment is to be presented at the meeting. A legal notice is also recommended, as a supplement to news releases, on other subjects of controversy or great public interest, to insure that notification is made to the public.

4. Advance Availability of Documents: Steps should be taken to insure that the public has an opportunity to review the subject documents in a variety of convenient locations. To place copies in Park Headquarters and the Regional Office is not adequate. It is recommended that review copies be placed in public libraries, college and university libraries and other appropriate places accessible to the public. (see attached Exhibit IV). These locations where documents are available should be listed in the original news release. This, of course, will be in addition to the advance distribution of documents legally required by the National Environmental Policy Act and by Park Service practice to Federal, State and local governmental agencies and recognized conservation organizations, which must be accompanied by a cover memorandum.

It is essential that all field areas develop and maintain a comprehensive mailing list for distribution of documents pertaining to public involvement. In addition to government officials and agencies, and recognized conservation organizations, the list should include organizations of other major park users and/or concerned special interest groups who may or may not be in sympathy with our programs and objectives.

Your list should include:

- Number of interested publics
- Size of individual public groups
- Geographic location of interested publics representatives or individuals
- Identification of how the publics wish to be involved and their principal interests

These and other similar needs will be identified by the planning team in consultation with the superintendent and regional personnel, listed in the Planning Directive, and shown for action by the superintendent within the time frame as stated in the Directive.

5. Meeting Sites: Meeting sites should be selected with the aim of serving not only the immediate community surrounding the park but also major population centers. In all situations involving Master Plans, DCPs and other major proposals there shall be at least two meetings, one in or near the park and one will be held outside the park. If possible, the out-of-park site should be convenient to public transportation.

6. Meeting Format: In general, the meeting format should provide for an orderly presentation of the issues, but also should be informal enough to encourage maximum discussion and participation by the audience.
Everyone should leave the meeting feeling they had a fair opportunity to be heard. At the outset, the presiding officer should clearly explain the format, including "the ground rules" on length of oral statements, order of speakers, question and answer period, adjournment time, etc. Although the format may vary somewhat depending on local conditions, the first step after the opening statement should be presentation of the plan. This should be as brief as possible, to allow a maximum amount of time for audience participation and to avoid the impression that National Park Service spokesmen are filibustering to cut down on the time available for public discussion. Park management has the responsibility for making plan presentations at public meetings. Planning personnel should be available for back-up to the management people making the presentation.

7. The Presiding Officer: It is desirable that someone other than the Superintendent, or other Park Service Official be the presiding officer. Experienced people with NPS backgrounds are available on an expenses-only basis for this function. Names may be obtained from the Public Affairs Office. Selection of the presiding officer is extremely important, because the manner in which he or she conducts your meeting can literally mean the difference between success and failure, regardless of the other efforts that have gone into pre-planning.

8. The Record: It is important that you have a reliable record of your meeting. The high cost will, in most instances, rule out professional court reporters. However, all meetings can be and should be tape recorded. Region will assist with equipment and personnel in this function. This record will prove extremely valuable to all of us in our post-meeting review and analysis.

9. The Wrap-up: The closing statement by the presiding officer should stress that the record will remain open for an additional 30 days to receive written statements. Further, he should note that the National Park Service officials present will remain after adjournment for personal discussion with members of the audience.

10. The Follow-up: A verbatim transcript of the meeting should be made available for public review as soon as possible, preferably within 30 days. Subsequent news releases, statements, etc. regarding the final version of the plan or proposal should always make reference to the previous public meeting.

VII - 4
The public was invited today to help plan the future development and growth of Pinnacles National Monument.

Rothwell P. Broyles, Superintendent of the Monument, announced that two public meetings will be held on the proposed Master Plan for Pinnacles, which was established as a National Monument in 1908.

The first session will be held at 7:30 p.m., Friday, May 31, in the music room of San Benito Joint Union High School in Hollister, followed by a 9 a.m. meeting on Saturday, June 1, at City Hall, 647 Front Street in Soledad.

"We are anxious to receive the benefit of the widest possible range of public opinion on these proposed plans for the future of Pinnacles National Monument," Broyles said. "The Master Plan is a conceptual document that gives general direction to the park's operation, including physical developments, resource management and visitor facilities."

Broyles stressed that the document is a preliminary proposal as National Park Service policy requires that public review and comment be obtained before final decisions are made.

"We are asking those who plan to make oral statements to give us written notice 10 days in advance of the meetings, if possible," Broyles said. "However, both meetings will continue until everyone present has had an opportunity to be heard."

Those unable to attend either meeting personally, may file a written statement at Monument headquarters any time before July 1, he added.

Broyles asked that all written communications regarding the meeting be addressed to: Superintendent; Pinnacles National Monument; Paicines, CA 95043. Information also may be obtained by calling Monument headquarters at 408-389-4578 between 8 a.m. and 5 p.m.
Pinnacles National Monument
Paicines, California 95043

April ____, 1974

Name of Organization or Individual
Address
City, State, Zip

Dear ____________:

Pinnacles National Monument is planning for the future and seeks your help.

For some time, the National Park Service has been developing a Master Plan for this Monument, which was established in 1908 and attracts over 160,000 visitors a year.

The preliminary draft of this conceptual document, which deals with the future development and management policies for the Monument has been completed and we are anxious to have the benefit of public review and comment, before making any decision.

Accordingly, we have scheduled two public meetings on this draft Master Plan and it is my pleasure to extend a personal invitation to you to attend either or both of them.

The first meeting will be at 7:30 p.m., Friday, May 3, at San Benito Joint Union High School in Hollister. The second will start at 9 a.m., Saturday, June 1, at City Hall, 647 Front Street, in Soledad. Both meetings will continue until everyone present has had an opportunity to be heard.

To help us in our planning, we would appreciate your notifying me here at Monument headquarters 10 days in advance of the meeting if you intend to make an oral presentation.

Copies of the draft Master Plan and Environmental Impact Statement are now available for your inspection here at the Monument, at the Los Angeles Field Office, at our Western Regional Office in San Francisco and at the public libraries in Hollister, Soledad, King City and Salinas and at the library of Gavatin Community College in Gilroy.

(alternate)

(I am pleased to enclose copies of the draft Master Plan and Environmental Impact Statement for your review in advance of the meeting.)

If you need additional information, please call my office at 408-389-4578 or write to:

Superintendent
Pinnacles National Monument
Paicines, California 95043

Sincerely yours,

Superintendent
Notice of Public Meetings

The National Park Service, U. S. Department of Interior, cordially invites the public to attend two public meetings on the draft Master Plan and Environmental Impact Statement for Pinnacles National Monument, Paicines, CA.

The purpose of the meetings is to obtain public reaction to, and comment on, the proposed Master Plan that will be helpful in shaping the final form of that document.

The first meeting will be held at 7:30 p.m., Friday, May 3, at San Benito Joint Union High School, in Hollister. The second will start at 9 a.m., Saturday, June 1, at City Hall, 647 Front Street, in Soledad. Both meetings will continue until everyone present has had an opportunity to be heard.

Persons wishing to make an oral presentation are asked to send written notice to the Superintendent, Pinnacles National Monument, Paicines, CA 95043 10 days in advance of the meeting.

Copies of the draft Master Plan and Environmental Impact Statement are available for public inspection at Pinnacles National Monument; the Los Angeles Field Office of the National Park Service, New Federal Bldg, Los Angeles; the Western Regional Office, 450 Golden Gate Avenue, San Francisco; the public libraries in Hollister, Soledad, King City and Salinas and at the library of Gavilan Community College in Gilroy.

Further information may be obtained by calling Monument headquarters at 408-389-4578, or writing to Superintendent, Pinnacles National Monument, Paicines, California 95043.

/s/ Rothwell P. Broyles

Date: ______________________
(of signing)
Publication of Legal Notices:

Section 25, Special Requirements for Specific Types of Disbursements, of the Fiscal Procedures sets forth the requirements for advertising.

To comply with the requirements of law relating to advertising the following procedure is to be followed:

Payment for legal notices can only be made on a SF 1143, sample enclosed, which is the Voucher for Advertising Expenses. Proof of publication must be submitted with the voucher. This proof may either be copies of the publication (legal notice as published) or an affidavit of publication attested by the publisher.

The Western Region has a blanket authority to publish Notices of Intent for Environmental Impact Statements, copy attached. A copy of this memorandum of authority must also be made a part of the SF 1143 voucher when it is submitted for payment. If a legal notice does not cover an EIS action, a specific authorization must be obtained. In that case, the Regional Office will take the necessary action to get that authority.

Duplicate copies of the published legal notice and/or affidavit of publication should be made and become a part of the official record of the meeting.
Memorandum

To: Field Directorate

From: Acting Associate Director, Administration

Subject: Publication of advertisements of notices of intent on environmental impact statements

In accordance with Title 7, Chapter 5, Section 25.2, of the GAO Manual and delegation of authority in 205 DM, you are authorized to publish notices of intent on environmental impact statements in newspapers, periodicals, etc., as the need arises.

This is a continuing authorization and a copy must be attached to each bill for advertising or publication services rendered hereunder.

sgd
Chas. L. Mangers
# PUBLIC VOUCHER FOR ADVERTISING

**U.S.**

*(Department or establishment, bureau or office)*

**Voucher prepared at**

*(Give date and place)*

**THE UNITED STATES, Dr., To**

*(Name of publication)*

*(Publisher or proprietor or his representative)*

**Address**

*To publication of attached advertisement in the above-named publication, as authorized by the attached Advertising Order, on*  

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*(Here paste advertisement clipped from publication, including upper and lower rules on each copy of voucher)*

**I certify that the above attached advertisement appeared in the publication on**

*(Give dates advertisement was published)*

**and that the account as stated is correct and proper for payment.**

Date $Approved for $...

*(Signature or initials)*

**ACCOUNTING CLASSIFICATION**

**PAID BY**

Schedule No.

*Paid by Check No.*

*Approved for $………..* and over his official title.

*Line out words not applicable.*

*If the ability to certify and authority to approve are combined in one person, one signature only is necessary, otherwise the approving officer will sign in the blank space below "Approved for $……….." and over his official title.*
ADVERTISING ORDER

U.S. 

The Publisher of 

Sir:

You are hereby authorized to publish the enclosed advertisement relating to 


to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications attached to the advertisement, in the edition of your paper, 

provided your rates are not in excess of the commercial rates charged to private individuals, with the usual discounts.

Respectfully,

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specially ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid will accompany the advertisement copy submitted to the publisher with the advertising order and copies of both documents will be furnished to the General Accounting Office with the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC D.C.

Your bill for this service should be rendered upon the voucher form printed on the reverse hereof immediately after the last insertion of the advertisement. The voucher, together with a marked copy of each issue of the paper containing the advertisement, should be addressed to

If copies of the publication are not available, it will be satisfactory if an affidavit of publication is furnished in lieu thereof.

IMPORTANT

Charges for advertising when a cut, matrix, stereotype, or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall an advertisement extend beyond the date and edition herein named for publication.

U.S. GOVERNMENT PRINTING OFFICE: 1965 Dec 104565
PUBLIC VOUCHER FOR ADVERTISING

U.S. (Department or establishment, bureau or office)

Voucher prepared at (Give date and place)

THE UNITED STATES, Dr., To (Name of publication)

(Publisher or proprietor or his representative)

Address

To publication of attached advertisement in the above-named publication, as authorized by the attached Advertising Order, as follows:

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Amount verified; correct for

SIGNATURE OR INITIALS

ACCOUNTING CLASSIFICATION

Paid by Check No.
INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or ledged or prominent headings, unless specifically authorized in the specifications attached to the advertisement, in the edition of your paper, prior to or on (Give date on which publication is desired) provided your rates are not in excess of the commercial rates charged to private individuals, with the usual discounts.

Respectfully,

INSTRUMENT OR ASSIGNMENT

MEMORANDUM

DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C.

Bids are requested for new printing plant equipment contract. Including material work, Washington, D.C., April 2, 1954, containing $1,000,000 for 12 BCC Class III, Letterpress Repairs and 2,000,000 for 8 BCC Class A, Pavement, & showing repairs and cast set repairs only. Included material available from the Procurement Office, D.C. Tender due to be opened on the Procurement Office at 10 a.m., November 15, 1954.

Your bill for this service should be rendered upon the voucher form printed on the reverse hereof immediately after the last insertion of the advertisement. The voucher, together with a marked copy of each issue of the paper containing the advertisement, should be addressed to

If copies of the publication are not available, it will be satisfactory if an affidavit of publication is furnished in lieu thereof.

IMPORTANT

Charges for advertising when a cut, matrix, stereotype, or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall an advertisement extend beyond the date and edition herein named for publication.
Dear Librarian:

The National Park Service has scheduled public meetings on the proposed Master Plan for Pinnacles National Monument, on May 31, 1974, in Hollister and on June 1, 1974, in Soledad.

Two documents - the Draft Master Plan and the accompanying Environmental Impact Statement - will provide the basis for discussion at these meetings. We are interested in making these documents widely available to the public in advance of the meetings.

Unfortunately, publication costs prohibit our providing every interested citizen with copies of these documents. Therefore, we respectfully request that we be allowed to place a set of these planning documents on "reserve" in your library, available for public inspection during your normal hours of operation.

These documents should be held on your reserve shelves for 90 days after receipt and then disposed of as you see fit.

Your favorable consideration of this request would greatly assist us in our effort to obtain the benefit of informed citizen involvement in our decision-making process by giving people the opportunity to become familiar with and respond to Park Service plans for Pinnacles National Monument.

We are enclosing a self-addressed, postage-free card for your convenience in responding to this request. May we hear from you soon?

Sincerely yours,

Rothwell P. Broyles
Superintendent

Enclosure
CARD FORM

To: Superintendent, Pinnacles National Monument

( ) Yes. We will be pleased to accept copies of planning documents on Pinnacles National Monument and make them available for public inspection during the 90-day period requested in your letter.

( ) No. We regret that we are unable to comply with your request.

(signed)________________________

_________________________ Library

Superintendent
Pinnacles National Monument
Paicines, CA 95043
VIII

FILMING POLICY
FILMING POLICY

The June 13, 1975 memorandum from Director Everhardt that follows sets forth the new NPS policy on commercial filming. This new policy has been several years in preparation and makes several significant changes from previous practices. All field personnel involved in the issuance of filming permits should become familiar with the new policies.

Please note particularly the new requirements regarding major motion pictures; cooperative agreements; posting of bonds; off-duty employment of NPS employees; NPS supervision of filming, and First Amendment Rights.

Requests for Regional Office concurrence on issuance of permits for "major motion pictures, involving the use of professional casts, settings and crews" should be directed to:

Regional Director, Western Region
Attention: Associate Director, Park System Management

Requests for clarification or interpretation of the commercial filming permits policies should be directed to the Public Affairs Officer, Western Region.

The existing requirement for promptly supplying the Regional Public Affairs Office with copies of all film permits remaining in effect.
Memorandum

To: WASO and Field Directorate

From: Director

Subject: Commercial filming activities

The policy of the National Park Service relating to Motion Pictures and Television Production is as follows:

The making of motion pictures, television productions, or sound tracks may be permitted by Superintendents under conditions that protect the resources of the park, do not conflict with the public's normal use of the park, and are in compliance with the regulations contained in 36 C.F.R. Chapter I. See 43 C.F.R. Part 5. Major motion pictures, involving the use of professional casts, settings, and crews, should not be authorized without the concurrence of the Regional Director. Motion picture productions involving the participation of the Service under cooperative agreements shall not be authorized without the concurrence of the Director.

1. Constitutional First Amendment rights. As a government organization we must be particularly careful not to violate any rights of the public--including the exercise of freedom of speech and freedom of press through the medium of filming.

Amateur photographers and bona fide newsreel and news television photographers and soundmen are not required to obtain a filming permit. The purpose of this exception is to avoid any prior restraint of activities that are clearly an exercise of freedom of speech or press. This is not to say, however, that people engaged in such activities are free to violate Park Service regulations. They are excepted from the permit requirements of 43 C.F.R. Part 5 only, but not from other regulations in 36 C.F.R. Chapter I.
Drawing a line between exempt amateur filming activities and commercial filming activities may be difficult in some circumstances. The exercise of discretion is called for, keeping in mind the degree of professional involvement and the commercial aspects of the activities.

Commercial filming ventures, for which permits are required, are also subject to First Amendment considerations. The fact that they are subject to the permit requirement does not mean that the government is free to control the content of the films produced or to censor them. Permits may be denied only where the activities proposed would be potentially damaging to the natural resources within the area, would unreasonably curtail or impair the right of the public to use the affected area during filming activities, would unreasonably burden the supervisory capacity of the Park Service in the affected area, or would result in filming activities which contravene the regulations contained in 36 C.F.R. Chapter I.

The proposed content of the film does not in and of itself provide a sufficient basis to deny a filming permit. Film content may, however, be indirectly affected under the circumstances in which the Park Service has a legitimate, authorized interest in regulating the activities which produce the film or are the subject of the film. If the activities to be filmed, for example, would violate park regulations or result in potential damage to the park ecology, the Service may deny the permit or revoke any issued permit.

While conditions are required to be imposed in all permits, the Superintendend may not reserve the right to review the film produced in the Park System area as a condition of the permit. He must, however, attach conditions to the permit under 43 C.F.R. 5.1(d)(3) that he deems necessary to insure the protection of cultural and natural resources, the rights of the general public to unimpaired use of the area, and conformance with Service regulations. Accordingly, although he may not review the film produced or engage in script review, there should be a dialogue with a film permit applicant to assure that the applicant understands the restrictions being placed on the filming activities.

2. **Resource Damage.** Any modification of the park's resource should be carefully considered. Obvious things, like driving vehicles off roads where prohibited, illegal aircraft use, cutting trees, destroying wildlife, removal or disruption of artifacts, or any permanent altering of the area's resources must be prohibited. Temporary, nondestructive, modifications, such as placing of a prop, a tent, vehicle, actor, etc., will still have to be judged on a specific situation basis. Temporary
placement of props, actors, or products may be allowed if the resource is left intact after the filming is completed, and the activity is of such a nature that would be permitted the general public. The guideline, however, is that there be no resource or property damage, and a filming company should not be allowed to do things in a park which are denied the general public.

A manager must insure that the integrity of the resource has been preserved after the filming crew has left the area.

Film permits may be denied due to anticipated resource damage. Conditions may be attached, in addition to those already listed in 43 C.F.R. 5.1(d)(3), to protect the wildlife and natural resources. Filming activities may be cancelled or curtailed, regardless of the existence of a permit, where resource damage occurs or is threatened or regulations in 36 C.F.R. Chapter I are being violated.

A cautionary note is warranted with respect to the condition in 43 C.F.R. 5.1(d) 3 (iii) pertaining to filming of wildlife. The purpose of this provision is to prevent harassment, disturbance, or manipulation of wildlife by people engaged in filming. It does not prevent them from filming wildlife removed from their natural state by other persons.

3. Film permit forms. A revised "Film Permit" will be issued in the near future. As part of the standard language, it will include: (a) a termination clause, to enable the park manager to terminate the permit for violation of any of the permit requirements or in the discretion of the superintendent with no liability to the Service; (b) a "save and hold harmless" clause and insurance requirement to protect the Service from claims or litigation resulting from the actions of the permittee or his agents and employees.

4. Bond Requirements for Film Permits. Under 43 C.F.R. 5.1(a) a bond or cash deposit is required when a filming permit is issued. The purpose of the bond is to insure that the area is left in as good condition after completion of filming activities as it was before. The Interior Department Solicitor's Office has held that a Superintendent has the right to require a $0.00 amount bond if he feels secure that there is no reasonably foreseeable risk of damage to the resource and if the activities permitted will not require clean-up or restoration.

As a general guideline, bonds or deposits will be required in an amount equal to the estimated cost to the Government of clean-up or restoration operations that would occur in the event the permittee failed to perform.
5. **NPS Supervision.** All filming activities authorized by permit must be supervised by an NPS employee to insure full compliance with all terms and conditions of the film permit.

A film company cannot be asked to pay a fee to the Government for the issuance of a film permit. However, if the superintendent determines that the issuance of a permit would place extraordinary burdens on the supervisory capacity for the area, he may deny the issuance of a permit, or he may require, as a condition of the permit, reimbursement for the value of the extra supervisory services provided. The moneys so received must be deposited in miscellaneous receipts. See 31 U.S.C. 483a and OMB Circular Circular A-25; 43 C.F.R. 5.1(b) 1; 16 U.S.C. 452.

6. **Government equipment.** Government equipment may be filmed while performing official duties. However, such equipment may not be loaned, rented to the film company, or diverted from its normal use for filming purposes. Please review the employee conduct regulations, 43 C.F.R. 20.735-15, in this regard.

Rental of NPS equipment on a reimbursable basis pursuant to 16 U.S.C. 1-b5 is authorized only to persons who "render services or perform functions that facilitate or supplement activities of the Department." The renting of equipment for filming activities may, therefore, be done only if the filming is being done to facilitate or supplement an official NPS activity. To undertake this type of arrangement requires a cooperative agreement with the film company. Cooperative agreements may only be entered into by the Regional Director with the concurrence of WASO.

7. **Off duty employees working for filming company.** See attached. In summary, government employees may work, off duty, for a film company only if they do not in fact perform or do not appear to the public to be performing official duties. This is most difficult if the employee is in uniform, or if his duties "off duty" are the same as his duties "on duty." While a uniformed employee could legally appear as a stand-in, double, or actor, he might be in violation of the law if he were to perform duties, such as traffic control or crowd control or supervision of the film permit, which the public could logically assume to be official duties. Before authorizing off-duty work, you should read and refer your employees to the employee conduct regulations of the Department, 43 C.F.R. 20.735-12. All employees of the Department are responsible for knowing these regulations and abiding by them. As a matter of policy, off-duty employment while in uniform is not permitted. In addition, no off-duty employee may be involved in a filming activity unless expressly cleared by the appropriate regional office.
8. **News events.** In all of the above, there is no intent to censurate or control the legal activities of bonafide newsreel and news television photographers and soundmen. No filming permit is required for this type of activity. They must, of course, not damage the resource of the area in which they are filming or violate other regulations of 36 C.F.R. Part I.

9. **Still photograph.** Commercial still photography involving the use of sets, props, lights or similar equipment should be treated as a commercial filming activity.

10. **Cooperative Agreement.** Any time a film company of the Service wishes to use a Park Service logo or Service mark, a license agreement is required. Should the film contain a credit line to the Park Service, advance WASO approval is required. These arrangements should be negotiated by the Regional Office and sent to WASO for review.

/s/
Gary Everhardt

Enclosure
IN REPLY REFER TO:

Honorable Henry S. Reuss
Chairman
Conservation & Natural Resources
Subcommittee
Committee on Government Operations
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

In the joint proceedings of December 20, 1974, before the Subcommittee on Conservation and Natural Resources of the Committee on Government Operations and the Subcommittee on Regulatory Agencies of the Select Committee on Small Business the views of the Solicitor's Office were requested on a number of questions. We are providing our views, separately from the submission of the National Park Service.

1. Question: What statutory authority authorizes the expenditure of funds and the assignment of personnel for the "Sierra" filming venture, including the establishment and funding of Mr. Morehead's position? (Tr. pp. 120-121).

Answer: The organic act of the National Park Service, 16 U.S.C. §1 et seq.

The Park Service has authority to cooperate in the production of films which interpret and promote the National Park System. The organic act of the National Park Service provides, among other things:

The Service thus established shall promote and regulate the use of Federal areas known as national parks, ... as provided by law, by such means and measures as conform to the fundamental purposes of said parks ... which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment
of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. (39 Stat. 525, 16 U.S.C. §1.) (Emphasis added.)

This statute delegates broad discretionary powers to the Director of the National Park Service. Therefore, activities undertaken by the Park Service that promote and interpret the use of national parks are authorized, provided such activities do not jeopardize the natural resources of the parks or impair the public's use and enjoyment of them.

The purpose of the Park Service's involvement in the "Sierra" filming was to cooperate in the production of a film for nationwide television distribution that would interpret and promote the use of the national parks in a manner consistent with Park Service regulations and policies. The Service intended the film series to depict the natural beauty of the parks and to alert the public to possible dangers and difficulties for public safety in the parks. It was hoped that, by publicizing the role of the Park Ranger, the series would engender understanding and cooperation with the activities and responsibilities of the rangers. Since the purpose of the "Sierra" venture was authorized, the participation of the Park Service in the production of the "Sierra" film series was a proper Park Service function.

Since the Park Service has authority to cooperate in the production of "Sierra," it necessarily follows that the Director can establish a position to fulfill that purpose. Mr. Morehead's Civil Service job classification is Park Ranger, Series 025. His position title is Assistant Director Technical Consultant. According to his position description, he was to "provide direction and daily liaison with the filming crew when actually on location in a park . . . , set standards for filming operations and procedures as they relate to NPS practices and techniques . . . , and ensure that the National Park Service image is accurately and favorably portrayed to the public-at-large." These duties were considered necessary to enable the Park Service to achieve its intended objectives from its participation in the filming.

In addition to his duties as a technical adviser, Mr. Morehead was required to supervise filming activities within park areas to protect Park Service interests. He was "responsible for ensuring that the most effective methods are used in the filming operations so that park visitors are inconvenienced as little as possible . . . and for the coordination of work assignments and supervision of
Service personnel who will be used for acting, clerical and miscellaneous assignments in connection with the filming project."

In this respect, his job was meant to effect a supervisory function over filming activities in addition to his positive influence on film production and content.

The creation of Mr. Morehead's position was necessary to enable the Park Service to fulfill its authorized purposes in cooperating in the production of "Sierra." The fact that Universal Studios may also have benefited from Mr. Morehead's technical assistance does not deprive the arrangement of its legality. It is useful to note that both the Departments of Justice and Agriculture participate in similar filming ventures for similar purposes. The "Lassie" series has been filmed with the cooperation of the Forest Service pursuant to delegated land management authority similar to the Park Service authority. 16 U.S.C. § 528. The "F.B.I." series is filmed with the cooperation of the Justice Department. It is our understanding that these agencies also have technical advisors to assist in the production of the series.

Since there is authority for the Park Service to cooperate in the production of a film such as "Sierra" and since Mr. Morehead's job was established for that purpose, then it follows that the Service was empowered to spend money for Morehead's salary. Accordingly, the expenditure of funds appropriated in the Department's fiscal year 1975 budget for salaries and expenses of the National Park Service (88 Stat. 603) to pay Mr. Morehead's salary was an authorized expenditure.

2. Question: Would it have been a violation of the First Amendment for the Park Service to cancel the permit and terminate filming due to a script which the Park Service did not think compatible with the Park Service image? (Tr. p. 160).

Answer: Under the arrangement between the Park Service and Universal for the "Sierra" filming, it would not have been a First Amendment violation.

Freedom of expression is protected in public parks, including areas of the National Park System, subject to reasonable regulation to protect legitimate government interests. Hague v. C.I.O., 307 U.S. 147 (1939); Women Strike for Peace v. Morton, 472 F. 2d 1273 (D.C. Cir. 1972). In regulating expression within park areas, the
Park Service must protect the natural resources and insure unimpaired public use and enjoyment of the area. The regulations in 43 C.F.R. Part 5 are designed to effect these purposes. Amateur and bona fide news filming may proceed without a permit, but commercial filming requires a permit. 43 C.F.R. 5.1 (a). Thus, commercial filming activities are subject to tighter controls designed primarily to insure protection of natural resources and public use and enjoyment. 43 C.F.R. 5.1 (d).

In administering the regulations pertaining to filming, the Park Service must be mindful of due process, equal protection, and freedom of expression. The "Sierra" filming permit, however, presents a special case. Despite the fact that the July 8 document is titled "Filming Permit" and it resembles other 43 C.F.R. Part 5 permits, it actually embodies the terms of a cooperative agreement between the Park Service and Universal Studios. Instead of having two separate documents; one being a permit and the other a cooperative agreement, the Park Service resorted to the expediency of incorporating each in one document.

The conditions of the July 8 "permit" -- or cooperative agreement -- give the Park Service the right, among other things; to review and approve any script to insure that the Service's image, standards, and ideals are accurately portrayed. Such a provision was an essential part of the agreement between Universal and the Service, since it allowed the Park Service to obtain its intended benefits from the production of "Sierra." It was a provision to which both parties had agreed, and therefore it did not constitute governmental regulation of free expression. Although no disagreement arose under this provision, a violation of the provision would have given the Park Service the right to terminate the cooperative agreement with Universal Studios. Termination would not have been an infringement of free expression, unless subsequent to termination Universal had been denied the issuance of a regular filming permit not embodying the terms of the cooperative agreement.

There would only be an inappropriate prior restraint of expression if the Service had cancelled the agreement - permit and then refused to grant a standard filming permit. Under the regulations in 43 C.F.R., Part 5 there is no basis to deny a film permit because the permittee will not agree to government script review and approval. If the Park Service had reached an impasse with Universal and if the Service had denied a standard film permit because of script review, then and only then would there have been a first amendment conflict.

Section 209 (a) of Title 18 prohibits the payment from an outside source to a government employee "as compensation for his services as an officer or employee of the executive branch of the United States Government." Both payor or payee are subject to the penalties imposed for a violation. The issue involved with the "Sierra" filming is whether the work performed by off-duty rangers, for which they were paid by Universal, could be considered "services as an officer or employee of the executive branch."

On the basis of the information then available to us, the Department advised on December 20, 1974, that this office did not consider the "Sierra" activities to be a violation of 18 U.S.C. 209 (a). That conclusion, however, deserves further elaboration in response to your questions.

The elements of a violation of Section 209 (a) include: payment of compensation by an outside, nongovernmental entity; receipt of payment by a federal employee; purpose or intent that the payment be for services as an officer or employee of the federal executive branch. The first two elements are not in dispute. The third element involves the issue of culpability in addition to the characterization of the work for which the government employees were compensated.

The character of the work performed by off-duty rangers for Universal Studios could, in some instances, be characterized as government duties. Off-duty rangers were told that while working for Universal their duties would be two-fold, including duties for Universal and duties for the Park Service. Among their duties as park rangers, they were expected to familiarize themselves with the provisions of the filming permit and to take action to protect park resources if necessary. Under the filming permit, there was to be one ranger on hand with full authority to stop any activity contrary to Park Service policies or standards. While this was ordinarily Mr. Morehead, on occasion off-duty rangers were instructed by him to supervise filming activities, and were delegated supervisory powers in his absence. Moreover, in the eyes of the public, off-duty rangers in uniform conducting traffic and engaging in crowd control could have appeared to be performing official duties.
On the other hand some of the activities of off-duty rangers clearly were not "services as a government employee." Off-duty rangers were not always in uniform. They did stunts, participated as extras and walk-ons, offered story-line suggestions, and rendered technical advice on various matters. In this connection, the wearing of uniforms for the purpose of appearing in the film could not be construed as improper. Furthermore, it is arguable that, despite the impression created, crowd and traffic control duties were rendered for Universal Studios and not as government services. Finally, it is important to note that park rangers were never required to work for Universal and they were not permitted to take leave from normal duty hours or to otherwise permit their off-duty work to interfere with their official duties.

While it is possible that, in certain instances, work performed by off-duty rangers can be characterized as government work, the purpose and the intent of the arrangement does not appear to meet the culpability requirements implicit in the third element of a Section 209 (a) violation. The criminal statute does not, on its face, require a showing of specific intent to prove a violation. Nevertheless, in the past the Attorney General has determined that the intent of the payor and payee is important in determining whether there has been a violation. 41 Op. A.G. 217, 220 (1955). Furthermore, the Attorney General has stated that the purpose of this statute is "that no government official or employee should serve two masters to the prejudice of his unbiased devotion to the interests of the United States." 33 Op. A.G. 273, 275 (1922). The purpose of the statute is to avoid conflicts of interest. See Executive Order No. 1122, May 8, 1965, 30 F.R. 6469; Memorandum of Attorney General, February 1, 1963, 28 F.R. 985.

The absence of intent on the part of the Park Service employees to receive payment from Universal for their government duties is evidenced in the July 10 memorandum. They were instructed to avoid at all costs any payment for on-duty work. They were also instructed not to shift days off or take annual leave to work for Universal. Moreover, their instructions to halt actions "degrading or damaging to the flowers, etc." were no more than what was normally expected of them when off-duty. Therefore, it appears that the off-duty rangers were not intentionally or even knowingly violating the statute. Since the off-duty work was permitted under guidelines of the Superintendent, it is possible Universal also lacked the requisite culpability.

The purpose of the payments is also important. There is no evidence to indicate that the payments created a conflict of interest. The rangers were not permitted to allow their off-duty work to...
their on-duty performance. Even while off-duty, they were instructed to protect the interests of the United States. Universal, moreover, did not make the payments to obtain special favors or discriminatory treatment.

Since, all of the elements were not present in the "Sierra" filming to constitute a violation of Section 209 (a), we do not recommend that any prosecutions be undertaken. We are, however, transmitting the information we have on these activities to the Justice Department pursuant to the requirements of 28 U.S.C. § 535 with our recommendation that no prosecution be initiated.

4. Question: What would have been the liability of the federal government under the Tort Claims Act had there been an accident involving off-duty rangers working for Universal Studios? (Tr. p. 125).

Answer: In the arrangement with Universal Studios, there was a potential for government liability under the Tort Claims Act.

The Federal Tort Claims Act, 28 U.S.C. § 2671 et seq., allows suits against the United States for torts committed by "any employee of the government while acting within the scope of his office or employment under circumstances where the United States, if a private person, would be liable to the claimant in accordance with the law of the place where the act or omission occurred." 28 U.S.C. § 1346 (b). The crucial issue in the "Sierra" filming, therefore, is whether off-duty rangers working for Universal are government employees acting within the scope of their employment.

While we are of the opinion that the National Park Service has authority to cooperate in the production of films about the Park Service, it does not follow that off-duty rangers working on such films are necessarily acting within the scope of their employment. Cf. Fries v. United States, 170 F. 2d 726 (6th Cir. 1948). The resolution of this issue is a matter of state law, the basic issue being the existence of a master-servant relationship between the government and the employee at the time of the injury-causing conduct. Williams v. United States, 350 U.S. 857 (1955). Thus, depending on the particular facts of the conduct alleged as the basis for a tort claim, it is possible that the Government could be found liable.

The issue of tort liability can only be addressed on a theoretical level since we have no information used by off-duty rangers and since the determination of liability depends on the facts of each
injury. It is clear, however, that the government would not be liable for torts committed by Universal or anyone employed by Universal and acting within the scope of that employment. Thus, for example, if an off-duty ranger, pursuant to his duty to supervise the film permit, negligently moved equipment that caused an injury, it is likely that the government would be found liable. On the other hand, if the off-duty ranger moved the equipment on orders from the producer, then the government would not be found liable.

We feel compelled to point out the distinction between acting within the scope of employment for purposes of tort liability as opposed to the purposes of a prosecution under 18 U.S.C. § 209 (a). The issue of federal employment under the criminal statute is a matter of federal law in which the intentions of the parties are a crucial matter. Tort liability, on the other hand, is determined by reference to state law and the intentions of the parties are of less importance. Thus, it is conceivable that an off-duty ranger could be found to be acting within the scope of his employment for purposes of the Federal Tort Claims Act, but, nevertheless, not be guilty of the crime of receiving payment from a private company for his services as a government employee.

5. Question: Is a national park superintendent authorized to set zero as the amount of the bond required under 43 C.F.R. 5.1 (b)(2)? (Tr. pp. 118-119).

Answer: Yes

Filming within areas of the National Park System is not allowed unless a permit has been acquired from the official in charge of the area. 43 C.F.R. 5.1 (a). Amateur filming and bona fide news reporting are excepted from this requirement. Each permit issued is required to conform to conditions, which must as a minimum include resource protection conditions listed in 43 C.F.R. 5.1 (d)(3). For each permit, a bond or deposit is required. 43 C.F.R. 5.1 (b)(2). The amount of such a bond or deposit is to be set by the official in charge of the area "to insure full compliance with all of the conditions prescribed in paragraph (d)(3) of this section."

The primary purpose of the bond requirement is to insure protection of the natural resources of the area used for filming. 43 C.F.R. 5.1 (d)(3)(i). If in the discretion of the official in charge of the area there is no reasonably forseeable danger to the natural resources, then he is empowered to set zero as the amount of the bond. To do otherwise, that is to require a bond, would be a bureaucratic gesture that we do not recommend.
We have examined approximately nineteen permits for filming in Yosemite Park over a three-year period for which no bonds were set. For the most part, each permit was for one or two days duration. None involved any extraordinary use of the resources or burden on the administration of the park. For example, there is no reasonably foreseeable taxation of the resources in the filming, without lights or props, of an automobile on paved surfaces within the park. There is no burden on the resource in the filming with hand-held cameras of normal mountaineering activities. For these nineteen permits, there appears to have been no abuse of discretion in the failure to require the posting of a bond.

6. Question: What is the statutory authority to allow a concessioner to acquire a possessory interest in improvements he has made to government-owned buildings? (Tr. p. 172).

Answer: The statutory authority may be found in the Concessions Policy Act of 1965, 16 U.S.C. § 20 et seq.

The possessory interest is a right of compensation. It does not confer ownership rights. Hence, when a concessioner is given a possessory interest in improvements to a government building, he is given a right to be compensated for the value of the improvements he has made if the government should decide to terminate his contract or otherwise deprive him of the use and benefit of those improvements.

While federal law generally precludes a private person from repairing, altering or maintaining a government building, 40 U.S.C. § 303b, concession contracts are exempt from the provision, 40 U.S.C. § 303c and 16 U.S.C. § 20f. In addition, section 6 of the Concessioner Policy Act of 1965, 16 U.S.C. 20e, provides, inter alia, as follows:

A concessioner who has heretofore acquired or constructed or who hereafter acquires or constructs pursuant to a contract and with the approval of the Secretary, any structure, fixture, or improvement upon land owned by the United States within an area administered by the National Park Service shall have a possessory interest therein, which shall consist of all incidents of ownership except legal title, and except as hereinafter provided, which title shall be vested in the United States. (Emphasis added.)
This language authorizes a concessioner to have a possessory interest in fixtures, structures or improvements added by the concessioner with its funds to a government owned structure. In fact, the possessory interest would automatically vest unless waived or relinquished by the concessioner.

The phrase "on land owned by the United States," which was of concern at the hearing, relates to structures on federally-owned lands or improvements made to federally-owned buildings located on such lands, so long as the improvement is made with the approval of the National Park Service. The term "land" means the soil as well as any structures or improvements erected thereon. Montgomery County v. Cochran, 121 F. 17, 21 (5th Cir. 1903); Myers v. League, 62 F. 654, 659 (5th Cir. 1894); Reynard v. City of Caldwell, 42 P. 2d 292, 296 (Id. 1935); Black's Law Dictionary 1019 (4th ed. 1968).

The decision on whether or not to grant a possessory interest to improvements made to government-owned buildings is a policy matter committed to the discretion of the Director of the National Park Service. Such policy decision therefore comports with the statutory authority.


Answer: In certain circumstances the waiver of franchise fees is authorized.

Section 3 of Concessions Policies Act of 1965, provides in part as follows:

(d) Franchise fees, however stated, shall be determined upon consideration of the probable value to the concessioner of the privileges granted by the particular contract or permit involved. Such value is the opportunity for net profit in relation to both gross receipts and capital invested. Consideration of revenue to the United States shall be subordinate to the objectives of protecting and preserving the areas and of providing adequate and appropriate services for visitors at reasonable rates. Appropriate provisions shall be made for reconsideration of franchise fees at least every five years unless the contract is for a lesser period of time. 16 U.S.C. § 205. (Emphasis added).

This section of the 1965 Act grants the National Park Service authority to enter into a concession contract which provides for the waiver of franchise fees when, due to circumstances beyond the control of the concessioner, such action is warranted.
The interpretation we have given to this statute is further compelled by the language requiring that the concessioner be given "reasonable opportunity . . . to realize a profit on his operation as a whole commensurate with the capital invested and the obligations assumed." 16 U.S.C. § 20b(b). In reviewing franchise fees, "revenue to the United States shall be subordinate" to protecting the resources and providing adequate services. In addition, Section 2 of the Concessions Policies Act of 1965 provides:

... the Secretary of the Interior shall take such action as may be appropriate to encourage and enable private persons and corporations (hereinafter referred to as "Concessioners") to provide and operate facilities and services which he deems desirable for the accommodation of visitors in areas administered by the National Park Service. (Emphasis added).

Hence, when unforeseen developments, such as natural disasters, impose losses on the concessioner that jeopardize his investment and the continued provision of adequate services for visitors at reasonable rates, the Park Service is within its statutory mandate if it decides to waive the franchise fee.

The Park Service does not have unlimited power to waive the franchise fee, and the Park Service policy on franchise fee waiver recognizes these limitations. The policy of the National Park Service is stated in a memorandum of November 14, 1972. Fee waivers should not be encouraged. Waiver is to be allowed only if the concessioner demonstrates that he has suffered financial damage due to unanticipated or nonbusiness-related circumstances, such as acts of nature or construction delays caused by outside parties. Each request for waiver is to be audited when necessary prior to taking action. Thus, the waiver policy is an extraordinary remedy applied only when the concessioner is not at fault for the loss.

The waiver of franchise fees occurred before passage of the 1965 Act. This point is significant because the 1965 Act was intended as a Congressional affirmation of the policy previously followed by the Service in concession contracting:

The principal purpose of H.R. 2091 by Congressman Udall is to put into statutory form policies which, with certain exceptions, have heretofore been followed by the National Park Service in administering concessions within units of the national park system and in writing contracts for concessionaire services there. These policies have been in effect since 1950 by virtue of an understanding between the Committee on Interior.
and Insular Affairs and the then Secretary of the Interior. Among other things, they deal with the subjects of a concessioner's possessory interest in improvements constructed or acquired by him on national park land, the compensation to which he is entitled if, in various circumstances, he wishes or is obliged to give up this possessory interest, and the granting of preferential rights to established concessioners to furnish additional facilities and services when needed and in the renewal and extension of contracts. H. Rept. 89-591, pp. 1-2, 89th Cong., 1st Sess. (1965). See also S. Rept. 88-1426, p 3, 88th Cong., 2d Sess. (1964).

8. Question: Does the issuance of a film permit to a concessioner violate his concession contract or create a conflict of interest? (Tr. p. 261).

Answer: The issuance of a filming permit to Universal Studios neither violated the concession contract of Yosemite Park and Curry Co. nor created a conflict of interest.

The clause in the concession contract to which you referred is a "whereas" clause, not an operative term or condition of the contract. As a preamble to the contract, it cites a reason for the necessity of a contract prior to engaging in private business activities in a national park. As such, it is inapposite to the question raised. In addition, the clause reiterates the general policy that private interests are excluded from national parks unless specifically authorized by the Park Service. Since prior approval from the Park Service was obtained for the "Sierra" filming, this policy was not violated.

Granting a national park concessioner a permit authorizing additional activities within a national park but outside the concession contract does not create a conflict of interest, as that term is commonly used. A conflict of interest exists where competing interests impose inconsistent duties on one party that he is unable to serve equally. In Yosemite National Park, even if we look beyond the corporate veil and assume that M.C.A. is both the concessioner and the film permittee, such conflict of competing interest does not exist. The duties of M.C.A. as concessioner are to furnish visitor services. As a film permittee, the duties of M.C.A. are to avoid inconveniencing the public or harming the resources. There is nothing to indicate
that N.C.A. could not serve these duties equally, particularly since the Park Service supervised the performance of these duties in each of N.C.A.'s different roles. Moreover, we would suggest that it would be difficult to defend in litigation the refusal to grant a film permit on the grounds that the film company was also a concession contractor of the government. Absent a finding of an unavoidable conflict of interest, such a refusal would be arbitrary and capricious.

We appreciate the opportunity to respond to the issues raised by the Subcommittees.

Sincerely yours,

J. KENT FRIZZELL

Solicitor
APPENDIX
Information  
DEPARTMENTAL MANUAL  

Chapter 1 General Policy and Procedures  

1 Department Information Policy  

A. As a vital and integral part of its over-all mission, the Department of the Interior has a continuing responsibility to keep the public informed of its many programs and activities. The Department welcomes public examination of these programs and activities, not only as an inherent public right under our system of government, but also because public understanding and discussion are essential to the effective planning, conduct, and accomplishment of Department activities.

B. The overall responsibility for assuring adherence to this information posture rests with the Office of Communications, Office of the Secretary, which coordinates the general information activities of all bureaus and offices of the Department.

C. It is the policy of the Department and the Office of Communications to provide the public prompt access to information about its activities, in accord with long-standing Department policy as well as the provisions and spirit of the Freedom of Information Act (Public Information Section of the Administrative Procedure Act). Disclosure will be the general rule, not the exception, the burden will be on the Government to justify withholding of a document.

To assure the effective observance of this policy, all bureaus and offices and the Secretariat are responsible for consulting with the appropriate public information offices and with the Office of Communications at the Secretarial level when denial of documents is being considered. If, after such consultation, the initial decision is made to withhold the document, the reasons shall be stated to the person requesting the document. He shall be advised of the right to appeal to the Solicitor, and notification of the action taken shall be made immediately to the Office of Communications and the Office of the Solicitor. The Solicitor's office is responsible for notifying the Office of Communications promptly in writing of any appeal filed under the Freedom of Information Act.

D. It is the policy of the Department to encourage the sale of Departmental publications in order to increase the return of user fees to the Federal Government.

E. It is also the policy of the Department to increase dissemination of information by stressing reliance on suitable nongovernment media.

2 Procedures. To implement the foregoing policies, the following procedures will apply throughout the Department:

7/28/72 (Release No. 1470)  
Replaces 9/21/66 (Release No. 877)
A. All Washington headquarters press releases will be cleared by the Office of Communications prior to release. Moreover, press releases planned for release at field level by any Interior bureau or office shall be subject to prior approval by the Office of Communications if a policy announcement is involved.

B. Department publications, except those of a strictly scientific and engineering character, or those granted a waiver by the Office of Communications by virtue of being an established and continuing series, shall be cleared on Form DI 550 by the Office of Communications prior to printing. (See 471 DM and 314 DM).

C. Approval by the Office of Communications of motion picture proposals on Form DI 551 is required as soon as the preliminary planning has been completed and before any funds are committed for scripts or production. Scripts and answer prints of motion pictures will be sent to the Office of Communications for review and approval. (See 471 DM for policy & procedural details).

Moreover, prior approval by the Office of Communications is required of motion picture scripts and/or concepts before the Department extends cooperation or assistance for private production of films.

D. All speeches to be made by members of the Office of the Secretary, and by headquarters officials of bureaus and offices, will be given prior review by the Office of Communications. Speeches by bureaus and office officials also will be reviewed by the office of the appropriate Assistant Secretary prior to submittal to the Office of Communications. Speeches must be in the hands of the Office of Communications, complete with all prior clearances, at least 48 hours before departure for the speaking engagement.

This provision will be strictly observed for major speeches which enunciate or explain important Department policy and, wherever possible, for significant testimony before Congressional Committees. In cases in which time factors do not permit prior review by the Office of Communications of testimony prepared for delivery before Congressional committees, the Office of Legislative Counsel shall be responsible for providing the Office of Communications with at least 5 copies of such testimony on the day it is delivered.

E. All articles for publication written by employees of the Department of the Interior in their official capacities and that deal with policies or programs of the Department, its bureaus or offices, are subject to prior review by the Office of Communications.

7/28/72 (Release No. 1470)
Replaces 9/21/66 (Release No. 877)
F. Prior approval is required to be given by the Office of Communications for creation of new positions, appointments, promotions, transfers or termination of existing positions or termination of employment of professional-level employees engaged in information and information-related activities. This applies to all information officers, information specialists, and others in the information series. It also includes publications and visual media personnel engaged in activities related to public information. The Office may review performance ratings of such personnel.

G. The Office of Communications may obtain assistance directly from bureau information officers on any information project and, when occasion requires, may detail bureau information personnel to the Office of Communications for work on special projects. In the same manner, Office of Communications personnel may be detailed to a particular bureau or to the staff of the Secretariat for specific projects.

H. The Office of Communications has full responsibility for preparing and distributing the annual report (Conservation Yearbook) of the Secretary.

I. The Director of Communications may issue instructions to bureau information officers to carry out the assigned responsibilities of the Office of Communications.
Infor.r.i.tation 470 Public Expression
Chapter 2 Role of Bureaus and Offices and Field Information Activities

1 Role of Bureaus and Offices. Effective conduct of the Department's information program requires full cooperation between the Office of Communications and bureau and office officials including information personnel and field personnel. Bureaus and offices will carry on adequate information programs consisting of factual information about activities and accomplishments within their respective spheres of competence and announcements and explanations of final actions or newly adopted policies. Bureau and office officials should avoid speculation on unsettled questions or future policy and, when in doubt, should refer questions by news agencies on controversial subjects--particularly those involving more than one bureau or office--to the Office of Communications.

As a part of its responsibility for determining the information policy and procedures of the Department, the Office of Communications will, when necessary, direct bureau information officers and staff personnel as to the need for developing news, feature stories, or articles and make final determinations as to the manner in which information problems are to be handled.

Bureau information personnel must be kept constantly informed by staff and operating officials on all significant actions by their bureaus, and, in turn, the bureau information personnel are responsible for keeping the Office of Communications currently informed on these actions.

Determination of newsworthiness of policy actions, and the manner in which the news is to be disseminated, will be made by the bureau information offices with the concurrence of the Office of Communications.

2 Field Information. Field officials are responsible for disseminating accurate and adequate information about their work. However, they should confine statements made in their official capacity to factual material related to their area of responsibility. Field-written releases that deal in any degree with policy matters, or which cut across Department or bureau lines and thus may result in Washington involvement, will require prior review and approval by the Office of Communications, Office of the Secretary.

7/28/72 (Release No. 1470)
Replaces 9/21/66 (Release No. 877)

APPENDIX A-4
Policy and Procedures. It is the policy of the Department that requests from private organizations or firms for official expression in the form of written or graphic material, or speeches which require special preparation shall be complied with under the following conditions:

A. The expression is directly concerned with and is such as to promote better and wider understanding of Interior objectives, policies and programs, and activities.

B. The preparation or presentation of such expression does not impose an unreasonable burden on the staff of the bureau or office concerned.

C. If the organization or firm customarily pays compensation or expenses for such services, it will pay the Government for the services thus rendered at rates ordinarily paid. Such payments shall be accepted and deposited in the Treasury as Miscellaneous Receipts.

D. Prior review by the Director of Communications is required of any material designed for official expression by officials within the Department or its various bureaus and offices for presentations before non-governmental organizations, firms or groups.

Note: For policies and procedures governing non-official expression, see 478 DM.
Chapter 1 Films

.1 Scope. The provisions of this Chapter apply to motion pictures, slide programs, and video tape recordings (VTR), regardless of their financing, which are produced by, or attributed to, any bureau or office of the Department. Included within the scope of these provisions are films produced cooperatively by a bureau or office and a private organization; excepted are those produced for internal use only and those produced as integral parts of program operations, such as mine safety training films or park visitor center film strips.

.2 Responsibility of Office of Communications. The Office of Communications, Office of the Secretary, has general responsibility for matters involving visual media or information coming within the scope of this Chapter.

.3 Authorization. Prior to beginning work on any new film production as defined in 471 DM 1.1 (except those exempted therein), the bureau or office concerned will submit Form DI 551 Authorization request to the appropriate Assistant Secretary. Scripts and interlocks shall be reviewed by the Office of Communications. Form DI 551 may be obtained from the Director, Office of Communications.

.4 Restrictions on Use. Motion pictures, slide programs, or video tape recordings prepared by or for the Department (or any of its subdivisions) may be made available for public showing, including television showing, provided that (1) the use of the material shall not imply Interior Department endorsement of a commercial product or of a particular viewpoint espoused by a commercial firm or special-interest organization; and (2) the public shall not be charged a fee expressly and exclusively for the purpose of viewing the particular film, VTR, or slide program.

.5 Periodic Review. All films as defined in this Chapter shall be reviewed at least once every three years by the initiating bureau or office, and those deemed unsuitable for further circulation shall be retired.
Chapter 2 Still Photography

1 Official Photographs. Official photographs are those paid for by the Government or those taken by any employee on Government time, using Government equipment. They are the property of the Government and should be preserved accordingly. All contracts and agreements with non-Government photographers which involve reimbursement by the Government for taking official photographs shall specify that resulting selected and purchased negatives and color transparencies are to become the Government’s property.

2 Coverage. Representative still photographic coverage of pertinent activities is to be maintained consistently by all bureaus and offices having programs lending themselves to pictorial representation. Each shall establish an accepted, workmanlike system of numbering and identifying all official negatives and color transparencies.

3 Central Collections of News-worthy Photographs. Each bureau and office will maintain and keep current at its Washington Office a central collection of timely, news-worthy photographs and photographic slides representative of its programs and activities and develop, in cooperation with the Office of Communications, a program for their effective use.

4 Credit Line. Official photographs distributed for reproduction shall carry a credit line "United States Department of Interior" followed by designation of the bureau or office. Names of employee photographers will not be used on the credit line except with the prior approval of the Director of Communications, Office of the Secretary.

5 Advertising. Still photographic materials of the Department may not be used in advertising illustrations which connote Department approval of the product, service, or the firm named in the advertisement except in the case of materials illustrating equipment and supplies tested by the Bureau of Mines for use in hazardous areas.
Chapter 3 Displays

.1 Responsibility. The Director, Office of Communications, Office of the Secretary, has general responsibility for exhibits and displays to be used at conventions, fairs, and meetings, but not including permanent exhibits or displays which are integral parts of bureau or office facilities such as National Park visitor centers, the Departmental Museum, or Library.

.2 Production of Exhibits. Prior to beginning production of exhibits or displays to be used in conventions, fairs, or meetings, the bureau or office concerned will submit in duplicate to the Director of Communications a statement concerning the display. The statement will contain an explanation of the need for the display, its potential uses, and its cost, such explanation being accompanied by a rough sketch indicating the texts and illustrations intended to be incorporated in the display.

.3 Photographs of Displays. Each bureau and office currently having major exhibits or displays used for conventions, fairs, and meetings which are being used, or may be used in the future, will supply the Director of Communications with an 8 x 10 inch glossy photograph of such exhibit or display, and with respect to each major exhibit or display authorized in accordance with 471 DM 3.2, above, the bureau or office will supply the Director with a photograph of the authorized exhibit or display.
Chapter 1 General Policy and Procedures 478.1.1

.1 Definition. The term "nonofficial expression" as used in this chapter means the preparation, composition and presentation, including travel to the place where such presentation is to be made, of: (a) books, articles, pamphlets and brochures; (b) speeches, lectures, illustrated talks; or (c) visual presentations or drawings; by an employee of the Department of the Interior in other than the performance of his official duties. Provisions of other existing instructions with respect to outside employment, other than nonofficial expression, are to be found in 43 CFR 20.735.

.2 Policy.

A. It is the policy of the Department to encourage informed non-official expression by employees on matters within their competence, through published writings, lectures, graphic presentation and other means, although some of the subject matter may be related to the employee's official duties. Such expression should achieve better public understanding of Interior's programs and increase the spread of knowledge concerning the results of its scientific, technical and administrative activities. It is not the policy of the Department to restrict such expression nor to deprive its employees of proper recognition, including financial payments, for legitimate nonofficial expression.

B. If the subject material involves any contribution by the Government, either in the preparation or presentation, Department employees may not accept and retain remuneration from outside sources. This restriction is not intended to apply to nonofficial expression the preparation or presentation of which involves no use of government time, facilities, materials, travel or expense funds, or services of other government employees.

C. This policy is intended to assist serious, constructive effort, and neither suggests nor implies Department sanction of trivial or controversial expression by employees.

D. Regulations of the Department (43 CFR 20.735-12(c)(3)) provides that the Secretary, Under Secretary, Assistant Secretaries, heads of bureaus and other Departmental offices, and key fulltime officials who report directly to the Secretary as his principal assistants, shall not receive compensation or anything of monetary value for any consultation, lecture, discussion, writing, or appearance the subject matter of which is devoted substantially to the responsibilities, programs, or operations of this Department, or which draws substantially on official data or ideas which have not become part of the body of public information.

.3 Conditions. Any employee may engage in nonofficial expression on matters related to his official duties, or based primarily on knowledge acquired as a consequence thereof, provided that:

A. His work thereon in the preparation and the presentation is performed wholly outside duty hours.

B. The preparation or presentation thereof does not involve any contribution by the Government of time or services of other Government employees while in duty status, or of Government funds, facilities or materials.

C. The expression embraces only those ideas, concepts, data, statistics, intelligence, descriptions of scientific or technical processes or design, formulae, and similar information resulting from or in connection with those Departmental activities that are already published, or, if unpublished, are available to the public at the time of the employee's disclosure.

D. He files in advance with the head of his bureau or office, with an information copy to the Director of Communications, for clearance and consent in advance of publication or presentation, a notice of intention and certificate of compliance setting forth:

1. an outline of the subject matter of the proposed expression;
2. the medium of expression;
3. the title under which the work is to be published or presented;
4. his name and title to be used in the work, if such title is to appear;
5. the name or title of the published, or of the sponsoring organization in the case of lectures, speeches, or visual presentations;
6. a signed certification that the subject matter has been prepared or will be presented in full accord with the conditions set forth in all the foregoing segments or 478 DM.

Note: Further, attention is called to 18 U.S.C. 209, which provides, in pertinent part, that: "Whoever receives any salary, or any contribution to or supplementation of salary, as compensation for his services as an officer or employee of the executive branch of the United States Government, ... from any source other than the Government of the United States, except as may be contributed out of the treasury of any State, county, or municipality ... shall be fined not more than $5,000 or imprisoned not more than one year, or both."
The Associated Press Writing and Editing Committee compiled a list of 50 common errors in newspaper writing. Most are examples of word usage. Some are spelling. Some are grammatical rules.

The committee, headed by Wallace Allen, Minneapolis Tribune, noted there's plenty of room for quibbling about the list. "You may not agree with all the rulings. If you don't, feel free to take those tips you like and change those you don't like, as your conscience allows," the committee's report stated.

The bulk of it was assembled and written over several years by Dick Reid, an assistant managing editor of the Minneapolis Tribune, whose offerings have appeared in Tribune staff memos as Common Flaws, Ltd.

1. Affect, effect. Generally affect is the verb; effect is the noun. "The letter did not affect the outcome." "The letter had a significant effect." BUT effect is also a verb meaning to bring about. Thus: "It is almost impossible to effect change."

2. Afterward, afterwards. Use afterward. The dictionary allows use of afterwards only as a second form. The same thinking applies to toward and towards. Use toward.

3. All right. That's the way to spell it. The dictionary may list alright as a legitimate word but it is not acceptable in standard usage, says Random House.

4. Allude, elude. You allude to (or mention) a book. You elude (or escape) a pursuer.

5. Annual. Don't use first with it. If it's the first time, it can't be annual.

6. Averse, Adverse: If you don't like something, you are averse (or opposed) to it. Adverse is an adjective: Adverse (bad) weather, adverse conditions.

7. Block, bloc: A bloc is a coalition of persons or a group with the same purpose or goal. Don't call it a block, which has some 40 dictionary definitions.

8. Compose, comprise. Remember that the parts compose the whole and the whole is comprised of the parts. You compose things by
putting them together. Once the parts are put together, the object comprises or is comprised of the parts.

9. Couple of. You need the of. It's never "a couple tomatoes."

10. Demolish, destroy. They mean to do away with completely. You can't partially demolish or destroy something, nor is there any need to say totally destroyed.

11. Different from. Things and people are different from each other. Don't write that they are different than each other.

12. Drown. Don't say someone was drowned unless an assailant held the victim's head under water. Just say the victim drowned.

13. Due to, owing to, because of: We prefer the last.

Wrong: The game was canceled due to rain.
Stilted: Owing to rain, the game was canceled.
Right: The game was canceled because of rain.


Right: The laboratory is studying the ecology of man and the desert.
Right: There is much interest in animal ecology these days.
Right: Even so simple an undertaking as maintaining a lawn affects our environment.

15. Either: It means one or the other, not both.

Wrong: There were lions on either side of the door.
Right: There were lions on each side of the door.

16. Fliers, flyers: Airmen are fliers. Handbills are flyers.

17. Flout, Flaunt. They aren't the same words; they mean completely different things and they're very commonly confused. Flout means to mock, to scoff or to show disdain for. Flaunt means to display ostentatiously.

18. Funeral service. A redundant expression. A funeral is a service.

19. Head up. People don't head up committees. They head them.

20. Hopefully. One of the most commonly misused words, in spite of what the dictionary may say. Hopefully should be describe the way the subject feels.

APPENDIX B - 2
For instance: Hopefully, I shall present the plan to the president. (This means I will be hopeful when I do it.) But it is something else again when you attribute hope to a non-person. You may write: Hopefully, the war will end soon. This means you hope the the war will end soon, but it is not what you are writing. What you mean is: I hope the war will end soon.

21. **Imply and infer.** The speaker implies. The hearer infers.

22. **In advance of, prior to.** Use before; it sounds more natural.

23. **It's, its.** Its is the possessive, it's is the contraction of it is.

Wrong: What is it's name?
Right: What is its name? Its name is Fido.
Right: It's the first time he's scored tonight.
Right: It's my coat.

24. **Lay, lie.** Lay is the action word; lie is the state of being.

Wrong: The body will lay in state until Wednesday.
Right: The body will lie in state until Wednesday.
Right: The prosecutor tried to lay the blame on him.

However, the past tense of lie is lay.

Right: The body lay in state from Tuesday until Wednesday.
Wrong: The body laid in state from Tuesday until Wednesday.

The past participle and the plain past tense of lay is laid.

Right: He laid the pencil on the pad.
Right: He had laid the pencil on the pad.
Right: The hen laid an egg.

25. **Leave, let:** leave alone means to depart from or cause to be in solitude. Let alone means to be undisturbed.

Wrong: The man had pulled a gun on her but Mr. Jones intervened and talked him into leaving her alone.
Right: The man had pulled a gun on her but Mr. Jones intervened and talked him into letting her alone.
Right: When I entered the room I saw that Jim and Mary were sleeping so I decided to leave them alone.

26. **Less, fewer.** If you can separate items in the quantities being compared, use fewer. If not, use less.

Wrong: The Rams are inferior to the Vikings because they have less good linemen.
Right: The Rams are inferior to the Vikings because they have fewer good linemen.
Right: The Rams are inferior to the Vikings because they have less experience.

27. Like, as. Don't use like for as or as if. In general, use like to compare with nouns and pronouns; use as when comparing with phrases and clauses that contain a verb.

Wrong: Jim blocks the linebacker like he should.
Right: Jim blocks the linebacker as he should.
Right: Jim blocks like a pro.

28. Marshall, marshal. Generally, the first form is correct only when the word is a proper noun: John Marshall. The second form is the verb form: Marilyn will marshal her forces.

And the second form is the one to use for a title: Fire Marshal Stan Anderson, Field Marshal Erwin Rommel.

29. Mean, average, median: Use mean as synonymous with average. Each word refers to the sum of all components divided by the number of components. Median is the number that has as many components above it as below it.

30. Nouns. There's a growing trend toward using them as verbs. Resist it. Host headquarters and author, for instance, are nouns, even though the dictionary may acknowledge they can be used as verbs. If you do, you'll come up with a monstrosity like: "Headquartered at his country home, John Doe hosted a party to celebrate the book he had authored."

31. Oral, verbal: Use oral when use of the mouth is central to the thought; the word emphasizes the idea of human utterance. Verbal may apply to spoken or written words; it connotes the process of reducing ideas to writing. Usually, it's a verbal contract, not an oral one, if it's in writing.

32. Over and more than. They aren't interchangeable. Over refers to spatial relationships: The plane flew over the city. More than is used with figures: In the crowd were more than 1,000 fans.

33. Parallel construction. Thoughts in series in the same sentence require parallel construction.

Wrong: The union delivered demands for an increase of 10 percent in wages and to cut the work week to 30 hours.
Right: The union delivered demands for an increase of 10 percent in wages and for a reduction in the work week to 30 hours.

APPENDIX B - 4
34. Peddle, pedal. When selling something, you peddle it. When riding a bicycle or similar form of locomotion, you pedal it.

35. Pretense, pretext: They're different, but it's a tough distinction. A pretext is that which is put forward to conceal a truth.

He was discharged for tardiness, but this was only a pretext for general incompetence.
A pretext is a "false show"; a more overt act intended to conceal personal feelings.
My profuse compliments were all pretense.

36. Principle, principal. A guiding rule or basic truth is a principle. The first, dominant, or leading thing is principal. Principle is a noun; principal may be a noun or an adjective.

Right: It's the principle of the thing.
Right: Liberty and justice are two principles on which our nation is founded.
Right: Hitting and fielding are the principal activities in baseball.
Right: Robert Jamieson is the school principal.

37. Redundancies to avoid:

Easter Sunday. Make it Easter.
Incumbent Congressman. Congressman.
Owns his own home. Owns his home. The company will close down.
The company will close.
Jones, Smith, Johnson and Reid were all convicted.
Jones, Smith, Johnson and Reid were convicted.
Jewish rabbi. Just rabbi.
8 p.m. tonight. All you need is 8 tonight or 8 p.m. today.
During the winter months. During the winter.
Both Reid and Jones were denied pardons. Reid and Jones were denied pardons.
I am currently tired. I am tired.
Autopsy to determine the cause of death. Autopsy.

38. Refute. The word connotes success in argument and almost always implies an editorial judgment.

Wrong: Father Bury refuted the arguments of the pro-abortion faction.
Right: Father Bury responded to the arguments of the pro-abortion faction.

39. Reluctant, reticent. If he doesn't want to act, he is reluctant. If he doesn't want to speak, is is reticent.

40. Say, said. The most serviceable words in the journalist's language are the forms of the verb to say. Let a person say some-
thing, rather than declare or admit or point out. And never let him grin, smile, frown or giggle something.

41. Slang. Don't try to use "with-it" slang. Usually a term is on the way out by the time we get it in print.

Wrong: The police cleared the demonstrators with a sunrise bust.

42. Spelling. It's basic. If reporters can't spell and copy editors can't spell, we're in trouble. Some ripe ones for the top of your list:

- It's consensus, not concensus.
- It's restaurateur, not restauranteur.
- It's dietitian, not dietician.

43. Temperatures. They may get higher or lower, but they don't get warmer or cooler.

44. That, which. That tends to restrict the reader's thought and direct it the way you want it to go; which is non-restrictive, introducing a bit of subsidiary information.

For instance: The lawnmower that is in the garage needs sharpening.

(Meaning: We have more than one lawnmower. The one in the garage needs sharpening.)

The lawnmower, which is in the garage, needs sharpening.

(Meaning: Our lawnmower needs sharpening. It's in the garage.)

Note that which clauses take commas, signaling they are not essential to the meaning of the sentence.

45. Under way, not underway. But don't say something got under way. Say it started or began.

46. Unique. Something that is unique is the only one of its kind. It can't be very unique or quite unique or somewhat unique or rather unique. Don't use it unless you really mean unique.

47. Up. Don't use it as a verb.

Wrong: The manager said he would up the price next week.

Right: The manager said he would raise the price next week.

48. Who, whom. A tough one, but generally you're safe to use whom to refer to someone who has been the object of an action. Who is the word when the somebody has been the actor:

A 19-year-old woman, to whom the room was rented, left the window open.
A 19-year-old woman, who rented the room, left the window open.
49. Who's whose. Though it incorporates an apostrophe, who's is not a possessive. It's a contraction for who is. Whose is the possessive.

Wrong: I don't know who's coat it is.
Right: I don't know whose coat it is.
Right: Find out who's there.

50. Would: Be careful about using would when constructing a conditional past tense.

Wrong: If Soderholm would not have had an injured foot, Thompson wouldn't have been in the lineup.
Right: If Soderholm had not had an injured foot, Thompson wouldn't have been in the lineup.
<table>
<thead>
<tr>
<th>Public Information Officers</th>
<th>City of Refuge</th>
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<tr>
<td><strong>Arizona Archeological Center</strong></td>
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<tr>
<td>PIO - Carla Martin</td>
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<td>PIO - Park Ranger Terry Di Mattio</td>
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<td>Office - 714 - 293-5450</td>
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<td>PIO - Sam Henderson</td>
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<td>PIO - Peter G. Sanchez</td>
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<td>PIO - Wilton W. Hoy</td>
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<td><strong>Golden Gate NRA, Point Reyes NS, Fort Point NHS</strong></td>
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<td>PIO - Judy Walsh</td>
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Lehman Caves NM

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APPENDIX C - 2
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Organ Pipe Cactus NM
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Alt. - Irwin C. Cowley
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Petrified Forest NP
PIO - Hoyt Rath
Office - 602 - 524-6228
Home - 602 - 524-6589
Alt. - Walter Berrett
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Home - 602 - 524-3408

Pinnacles NM
PIO - Richard Rasp
Office - 408 - 389-4578
Home - 408 - 389-4585
Alt. - Helen Wilcox
Office - 408 - 389-4578
Home - 408 - 389-4424

Puukohola Heiau NHS
PIO - Rose Fujimore
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Alt. - Lorna Akima
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Home - 808 - 885-4501

Redwood NP
PIO - George Von der Lippe
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Home - 707 - 458-3110

Saguaro NM
PIO - Harold T. Coss, Jr.
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Home - 602 - 298-2036
Alt. - Dick Boyer
Office - 602 - 296-8576
Home - 602 - 296-9110

Sequoia-Kings Canyon NPs
PIO - James Howell
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Home - 209 - 561-4789
Alt. - Mrs. Irma Bucholz
Office - 209 - 565-3301
Home - 209 - 565-3352

SOAR
PIO - Thomas E. White
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Home - 602 - 949-9919
Alt. - David M. Forgang
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Tonto NM
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Tumacacori NM
PIO - Nicholas J. Bleser
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Whiskeytown NRA
PIO - Virgil Leimer
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Home - 916 - 359-2293

Alt. - Bob Crom
Office - 916 - 241-6584
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Tuzigoot NM
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Home - 602 - 634-8818

Alt. - William C. Bolton
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Home - 602 - 634-7059

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Alt. - Luis Gastellum
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Home - 602 - 526-3367

Alt. - James J. Bailey
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SECTION X
RESERVED