

Planning Clearinghouse—An Evaluation

October 8, 2002

Introduction

Planning Clearinghouse is a forum that has been in place for over a decade to oversee environmental compliance for operations and routine projects in Yosemite National Park. The existing planning and compliance environment in Yosemite has changed over this time with additional requirements from Director's Order

#12, litigation that challenged the adequacy of NPS compliance, and increasing public scrutiny of park projects and compliance. Currently, members both park management and staff have differing views on the role Planning Clearinghouse (PCH) fills. To create a compliance program that meets the needs of the park, managers and staff must understand the functions that are truly necessary. As part of this evaluation, interviews were conducted with park staff and management to help:

- Identify and understand the roles that Planning Clearinghouse is currently fulfilling
- Identify functions that are needed to provide compliance for operations and routine projects

This information will be used in the future to:

- Improve the efficiency of compliance for project proponents and compliance staff
- Clarify the process so that it can be easily communicated to park staff and park partners, and
- Ensure that the process meets the needs of park management



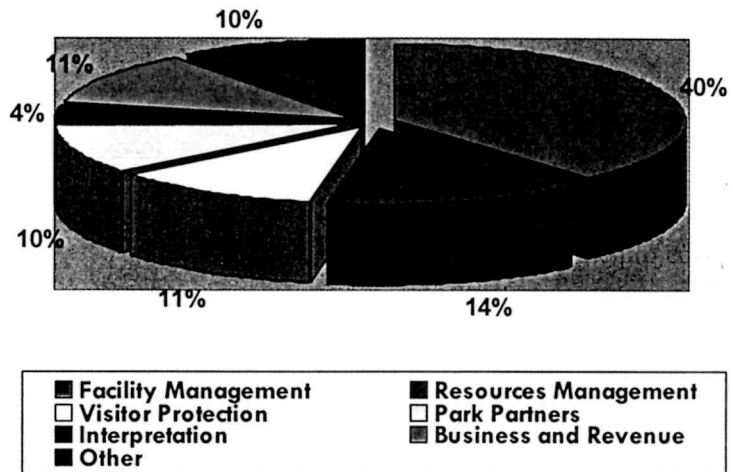
Summary of Recent Planning Clearinghouse Work

In 2000 and 2001, Planning Clearinghouse processed 255 projects. Proposals originated from every Division in the park, with the exception of the Division of Administration. The majority of proposals (about 41%) were submitted by the Division of Facilities Management (See Figure 1). Within the Division of Facilities Management, the largest number of proposals related to park structures and forestry practices.

Summary of Recent Planning Clearinghouse Work (cont'd)

About 107 projects (or 42%) entailed some sort of ground disturbance and required archeological evaluations. About 62 projects (or 24%) were located in the Merced River Corridor. About 21 projects (or 8%) originated from agencies outside of the park, and required review of projects that would take place outside park boundaries. About 20 (or 7%) of the projects proposed studies or monitoring systems, with little potential for environmental effects. About 18 proposals (or 7%) required analysis of historic structures, ethnographic resources, or cultural landscapes. About 15 proposals (or 6%) were located in the Tuolumne Wild and Scenic River Corridor. Seven proposals required special status species analysis.

Figure 1. Planning Clearinghouse Proposals By Division



Facilities Management

The Facilities Management Division submitted 104 proposals in 2000 and 2001. Most proposals related to structures in the park. Facilities to support these structures, such as recycling bins, were also included in this number. Examples of structure proposals include, picnic area improvements on the western shore of Tenaya Lake, the "Keiwi trailer" upgrade, and remodel of the back room of the Tuolumne Visitor Center. Most forestry proposals addressed the removal of hazard trees. Most Trails and Backcountry Utilities projects required a Wilderness Minimum Tool Determination.

Resources Management

The Division of Resources Management submitted 38 proposals in 2000 and 2001. Most proposals addressed restoration of degraded areas (about 37%) and stream water monitoring, weather monitoring, and hazardous material removal (about 37%). About 26% of the proposals addressed other projects such as wild turkey control and restoration of the mountain yellow-legged frog.

The Facilities Management Division (104 proposals)	
Office	# of Proposals
Structures	19
Forestry	17
Trails	16
Backcountry	12
Utilities	
Sewer	12
Roads/parking	7
Historic Structures	4
Solar/alternative energy	4
Water	3
Radio and telecommunications	3
Power	3

Visitor Protection and Fire Management

The Protection Division submitted 28 proposals in 2000 and 2001 of three main types – Fire, Wilderness, and Other. Most proposals originated from the prescribed fire office (about 36%). About 32% of the proposals originated from the Wilderness office. About 32% of the proposals addressed other projects such as rehabilitation of structures in Section 35, facilities at Lake Eleanor, and radar trailer purchase.

Business and Revenue Management

Business and Revenue Management submitted 32 proposals in 2000 and 2001. About 84% originated from the concessionaire (Yosemite Concession Services). The remaining 16% originated from Campground Management.

Interpretation

The Division of Interpretation submitted 10 proposals in 2000 and 2001. Proposals covered a variety of topics from buildings to house interpretation services, to interpretive exhibits, to installation of web cameras.

Park Partners and Homeowners

Park partners and homeowners submitted 15 proposals in 2000 and 2001. Six originated from inholding homeowners, five proposals originated from Pacific Bell and AT&T, two proposals originated from Yosemite Institute, and two proposals originated from the Yosemite Park Schools.

Other

There were 29 other proposals. These included out-of-park planning proposals for park review, YARTS proposals, Hetch Hetchy proposals (from the City of San Francisco), and proposals related to large plans such as the Merced River Plan.

Resources Management



■ Restoration ■ Streamflow / Hazmat □ Other

The Protection Division



■ Fire ■ Wilderness □ Other

Business and Revenue Management



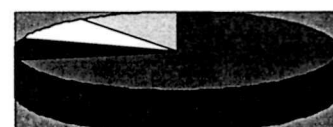
■ Concessions ■ Camping

Park Partners and Homeowners



■ Homeowners ■ Pac Bell/ATT
□ Yos. Institute □ Schools

Other



■ Out-of-park ■ YARTS
□ Hetch Hetchy □ Large projects

The Current Process

In July 1995, the roles and responsibilities of the Planning Clearinghouse committee were identified in a Standard Operating Procedure (see Appendix B). In November 1995, the Superintendent issued a directive that established a compliance committee to review and advise the Superintendent and the Planning Clearinghouse committee on all undertakings that may affect natural and cultural resources.

The current Planning Clearinghouse process digresses slightly from the 1995 Standard Operating Procedure. In general, a project proponent follows the following steps — obtain Division Chief approval, submit a Planning Clearinghouse proposal form, attend the monthly Planning Clearinghouse meeting, obtain environmental compliance documentation, as appropriate. The following additional elements may be part of the current process:

The Current Process:	Who
Step 1: State the need for the park to take action. Define the problem	Proponent
Step 2: Identify key players, main issues, and basic boundaries of the project. Estimate the level of help needed from other Divisions.	Proponent
Step 3: Obtain Division Chief approval	Proponent
Step 4: Submit Planning Clearinghouse proposal form to compliance staff.	Proponent
Step 5: Prepare an agenda for the monthly Planning Clearinghouse meeting and distribute to Division Chiefs, subject matter experts, and project proponents	Compliance Staff
Step 6: Discuss individual projects at the Planning Clearinghouse meeting	Compliance Staff, Project Proponents, Management Team
Step 7: Document Division Chief recommendations on each project	Division Chiefs
Step 8: Obtain Superintendent approval	Superintendent / Compliance staff
Step 9: Document evaluation, conditions or mitigation, and approval	Compliance staff
Step 10: Send documentation to project proponent, post on website	Compliance staff

In general, the following roles and responsibilities apply to the current process.

Planning Roles	
Superintendent	Review management and staff recommendations and make a final decision on project compliance, provide law and policy analysis.
Assistant Superintendent, Strategic Planning and External Affairs	Facilitate PCH process, facilitate Planning Clearinghouse meeting, provide law and policy analysis, recommend level of compliance.
Division Chiefs	Identify operational, resource, and compliance issues. Provide solutions to resolve conflicts. Define decisions that need to be made and facilitate making these decisions. Recommend conditions and mitigation. Provide law and policy analysis.
Compliance staff	Manage Planning Clearinghouse process—collect proposals, distribute agenda, document decisions, distribute compliance documentation to project proponent. Maintain Administrative record of CE-level projects. Maintain web page. Recommend level of NEPA and other compliance. Screen project for adherence to laws and policy including the National Environmental Policy Act, the National Historic Preservation Act, the Wilderness Act, the Endangered Species Act, the Wild and Scenic Rivers Act, the Clean Air and Clean Water Acts, and the National Park Service Floodplain and Wetland Guidelines.
Subject matter experts	Provide analysis of natural resource issues, cultural resource issues, operational issues, Wild and Scenic River issues, Wilderness Act issues, Clean Water Act issues, Clean Air Act, and other issues, as applicable. Provide potential mitigation to minimize impacts
Interested and affected public	Identify issues. Identify alternatives not discussed.

Interview Summary

In March through June 2002, the Strategic Planning office conducted a series of interviews with a diverse group of Yosemite National Park staff and members of the management team. Participants were asked the following three questions:

- (1) What functions should the Strategic Planning Office fulfill to enable you to do your work?
- (2) What needs improvement in the current Planning Clearinghouse process?
- (3) What would you like to retain in the Planning Clearinghouse process?

The results of the interviews are summarized below. The summary is an attempt to capture all discussion, not an attempt to reconcile comments. Interview participants are listed in Appendix A.

Management Team Comments

- Evaluate projects quarterly or three times a year
- Promote interdivisional coordination and consensus
- Provide environmental oversight on the types of projects that can be completed without impact to the Master Priority List
- Provide an opportunity for Division Chiefs to provide conceptual and interdivisional approval
- The management team is responsible for making responsible decisions and translating those decisions into reality
- Provide an opportunity to be pro-active with safety and insure that safety concerns are addressed
- PCH is a good tool, out of many, for communication among park staff and park partners. It should continue to play this role. It would be helpful to define the audiences that should be informed of decisions and projects.
- It is hard to define specific planning needs when it is not clear if the Project Management Division will be able to meet certain needs such as integrating "operational projects" into the master schedule. If Project Management does not meet this need, then prioritizing operational needs should be a function of PCH.
- One of the best things about PCH is that it fosters interdivisional communication and cooperation. In order for a project to make it through the system, one must work with all divisions.
- The closed session is disrespectful and shows a lack of trust for park staff
- The Project Management division would like to handle and document routine compliance through their shop, and avoid a process such as planning clearinghouse
- Compliance needs to move from being "a pain in the neck" to "just the way we do things around here."
- Consider identifying a separate process to review and complete environmental documentation for YCS projects.

General Staff Comments

Functions

Consider instituting a process that provides environmental regulation oversight and documentation.

- Document that environmental regulations have been met for all projects and operations
- Insure that maintenance work is in compliance with environmental regulations, before work takes place
- Create a “one-stop-shopping” place to initiate environmental compliance for Division Chief-approved projects.
- Provide an efficient forum for internal scoping for operational projects
- Provide an opportunity to obtain operational Categorical Exclusions and describe mitigations to ensure that environmental impacts do not take place
- Provide YCS with an advisory tool to determine the type of environmental compliance required, not necessarily to complete the compliance documentation
- Consider a process where projects are identified and described to ensure there are workable solutions/alternatives presented to the management team

Consider instituting a process that enhances interdivisional coordination and communication.

- Provide an opportunity to obtain initial (conceptual?) ok from the management team and Superintendent
- Provide an opportunity for problem solving. There needs to be an evolution of scale depending on the size and complexity of the project
- Provide an opportunity to discuss project elements and agree on scope of project
- Provide an opportunity for interdivisional collaboration and partnership
- Provide an opportunity for other divisions to provide early input in relation to other existing/ongoing /planned projects
- Promote debate among division chiefs and staff about merits of a project
- Provide an opportunity to share ideas, knowledge, build consensus
- Planning Clearinghouse should be the first interdivisional perusal of a project
- Provide an opportunity to meet obligations under NEPA and Director’s Order #12 to use an interdisciplinary approach to determine whether any connected, cumulative, or similar actions are part of the proposed action

Consider instituting a process that integrates resource management concerns.

- Provide an opportunity to provide resource-based information and resource-based recommendations on projects and routine maintenance
- Provide an opportunity to raise resource-based issues associated with projects and operations, as separate from conditions and mitigations imposed on projects

Interview Summary (cont'd)

General Staff Comments—Functions (cont'd)

Consider instituting a process that provides an opportunity for park partners to enter the system.

- Provide an opportunity for anyone to initiate a project— a venue for park partners (e.g. Yosemite Institute, Pacific Bell)
- Provide a forum for local govt. and other agency projects – PCH is the closest thing we have to a “planning commission”
- Provide an opportunity to meet obligations under NEPA and Director’s Order #12 to make a diligent effort to involve the interested and affected public.

Consider instituting a process that allocates staff resources.

- Use Planning Clearinghouse to allocate staff resources for operations and routine projects (e.g. cultural resources staff time)

Consider instituting a process that integrates utilities into the design and approval process.

- The PCH committee does not always look at the big picture in terms of utilities. Often a project needs water, power, or sewage and this is not considered
- Utilities staff relies on the chain-of-command to pass on projects and decisions made at PCH. This is not working. Projects and decisions are not passed to Utilities staff.
- Integrate utilities early into the PCH process as part of the design of projects. Often Utilities staff are the last to know about a project. Consider instating someone from the Utilities staff on the PCH committee.

Consider these other functions:

- Provide an opportunity to screen out larger projects
- Provide an opportunity to convey red flags (wetlands, etc.)
- Examine fire standards, utilities, safety, building codes, and cultural resources review
- Provide a review of projects for adherence to codes (fire, safety, etc.)
- Determine whether a Board of Survey report is required for a project (for removal of fixed assets such as outhouses, bridges, etc.) This process may take as long as 6 months.

One Gateway

Consider creating one place for all projects to enter the environmental compliance system.

- Provide one “gateway” for all projects, with very few exceptions (exceptions must be oked by Supt.)
- Planning Clearinghouse should be the first place for projects to enter the system

One Gateway (cont'd)

- All projects (even at the Environmental Assessment and Environmental Impact Statement level) should have an Environmental Screening Form (Director's Order #12). This guideline would be a lot easier to meet if all projects came through one entry point.
- It makes sense for all projects to go through one person or office – whether it is part of PCH or not.

Expand Planning Horizons

Consider expanding the role of PCH.

- PCH has been somewhat marginalized by park management. Management does not realize the potential of the committee. The park can use this type of forum to help solve some of their problems related to:
 - Integrated annual work plan
 - Goals and projects for the year

Instead, these issues are fought out during the budget battle for the year.

- PCH is viewed mostly as a compliance tool. It should be viewed as a planning tool.

Communication

Consider instituting a process that improves communication among park staff and park partners.

- Consider instituting a process that provides a complete picture of upcoming projects, both large and small
- Many projects, both large and small, have direct applicability with services provided by the Division of Interpretation. The Interpretation Division needs a means to obtain a complete picture of all projects. The division needs one place to look, to find one complete list. For example, interpretive staff may receive questions about the yellow-legged frog research at Visitor Centers. If the division was aware of the project ahead of time, it might be worthwhile to send someone out with the researchers for a day.
- The PCH process appears to be a one-way street. Proposals need immediate feedback of outcome. A phone call would be best – the website does not state how the decision was made.
- It appears that the Superintendent and Deputy Superintendent are not fully engaged with park operations because they do not regularly attend PCH meetings.

Chain of Command

Consider other routes (besides the chain-of-command) for passing on decisions and work assignments determined at PCH.

- Communication often stops at the PCH meeting. Attendees need to follow through with passing on work assignments. For example, PCH made a decision to pass the "oak root fungus education message" on to the communication team, but it was never passed on to the communication team. Another example— projects that involve utilities are not passed on to the utility shop until the last minute
- Park staff relies on the chain-of-command to pass on projects and decisions made at PCH. This is not working. Projects and decisions do not get passed on to park staff.

Interview Summary (cont'd)

General Staff Comments—Priorities

Consider setting park priorities in the Strategic Planning Office.

- Strategic planning should set priorities for the park. Project management should be responsible for getting work done after priorities have been decided.
- If Project Management does set priorities, they must be integrated with GPRA
- It is implied that every project that makes it through PCH is a #1 priority for the division. This is not necessarily true.
- It is hard for smaller essential “operational projects” to compete with larger projects
- Integrate and prioritize everything from operations to big EIS’s.
- Projects should be addressed according to scale

Emergencies

Consider initiating a process to provide environmental documentation for emergencies.

- A process needs to be in place for emergency actions

Administrative Procedures

Consider initiating the following procedures:

- A quorum should be required to hold a PCH meeting. If a quorum is not present, the Division Chiefs should go back to their own staff and explain why the meeting was cancelled.
- Keep meetings on track and moving
- Consider holding a pre-PCH meeting with stakeholders
- Assign each project a “compliance contact” to help move the project through the system
- Create a separate tracking system for all projects that require resource coordination
- Make decisions as early as possible as to the need for an EA or EIS
- Move the meeting to El Portal

Pre-Planning Clearinghouse Coordination

Reaffirm if/how proponents should gather information from other Divisions before going to PCH.

- Project proponents must go through a “communications game” before you get to PCH. If you do not prepare beforehand, you are an open target.
- The process should be as invisible as possible to project proponents. Proponents should not have to call Archeology, Wilderness, etc.
- It should be the responsibility of the project “generator” to work among the divisions to make sure all the bases are covered.

Pre-Planning Clearinghouse Coordination (cont'd)

- In order for a project to be successful at the PCH meeting, it is very helpful to speak with various key people beforehand (for example, if trenching will take place, it helps to contact the archeologists before PCH). This is hard for the cultural resource staff because they are not sure whether to commit a staff member for a day or two to evaluate a project, before it is on a priority list. On the other hand, the project proponent knows that their project will be held up at PCH until the cultural resource staff has made recommendations.

Cluster Similar Projects and Address them Through Alternative Pathways

Consider clustering similar projects and sending them through alternate pathways.

- Consider sending requests for project review from neighboring agencies (such as Mariposa County) through a different process other than PCH. Typically, when YNP receives a proposal from a neighboring agency, YNP prepares a response letter. By the time the initial proposal makes it to compliance staff to be put on the PCH agenda, and the PCH meeting is held, it is typically beyond the due date for any type of timely response. Consider sending the proposals directly to the Division Chief meeting to delegate a point person to research and prepare a park response.
- Consider grouping research projects and addressing them once or twice a year using an alternate process to PCH. Perhaps the Resources Management Division can facilitate the process by providing a hard-copy packet of projects with proposed mitigation to management staff. Management could review the packet and send back to RM. After consolidation, the packet could be sent to compliance staff for processing.
- Consider sending approvals for County variances in park inholdings through an alternative pathway, perhaps through the Special Park Uses Office (with review by Strategic Planning)
- Address YCS projects "all at once"
- Immediately identify EA and EIS level projects, and prioritize. Then send to Project Management for integration into Master Schedule.
- Make a distinction between routine work, operations, and projects. Handle each in a different manner.

Clarity

- PCH procedures are not clear. The process is confusing.
- It is not clear which projects need to go through the PCH process
- PCH seems like a "moving target", needs for compliance are not consistent
- Everyone has their own idea of what needs to come to PCH
- Prepare a "cookbook" to explain the process
- Clarify roles and responsibilities
- Supervisors need guidelines on how to proceed in each instance
- There is a double-standard as to which projects get moved through PCH

Interview Summary (cont'd)

General Staff Comments—Tenor of the PCH Meeting

- The PCH meeting can be very intimidating. Its kind of like being in court, only you are not able to defend yourself at the closed session.
- Sometimes you can stand up and feel pretty stupid at the PCH meeting.

PCH should continue to:

- Produce the website
- Distribute hard copies of the agenda ahead of time
- Send Yosemite Fund proposals through the process before they get very far. Helps to screen out “red-flags” early on in the process.
- Evaluate ongoing research projects.
- PCH is a good venue to *get the park read* on unusual project proposals. A good place to *run a proposal up the flagpole and see who shoots*.
- Evaluate projects in a batch, rather than haphazardly throughout the month. This is more efficient.

Timing

Consider reevaluating how often projects are evaluated

- From a proponent point of view – provide a venue to submit projects once a month
- Responses to Mariposa County projects are not timely. County projects should be assigned to one person who is responsible for review and gathering information.
- Proponents need to do more advance planning. Last minute projects are not ok. Evaluate most projects early in the year.
- When PCH is cancelled, projects are set back for a long period. There needs to be an alternative route when PCH is cancelled.
- It is difficult to plan day-to-day operations when it takes so long to move a project through PCH.
- It is hard to plan ahead for projects that are weather dependent, need materials from outside vendors, or have a small window when work can be done. Need alternative route for these types of projects.
- Projects need to move through the process in a more timely fashion
- Bring projects to the table every 6 mo. to one year to be prioritized by the Division Chiefs
- Once a year, park leadership should review projects on annual work plans and set priorities for next year
- Timing is very important for many types of maintenance work. There should be a way to meet the needs of projects that need to happen with very little advance warning. For example, many projects are timed on spring openings or major snowfalls.

Eliminate repetitive processes

Consider eliminating duplicate paperwork or combining forms

- Eliminate duplicate paperwork (project strategy, PCH proposal form, maintenance check-list)

Integrate with the Master Priority List

Determine how planning clearinghouse projects should be integrated with the Master Priority List

- There is confusion over how planning clearinghouse integrates into the Master Priority List
- It is not clear when a “project” becomes a “project” – before or after Planning Clearinghouse
- Role is vague – possibly used for operational projects as distinct from bigger projects

Integrate NEPA record-keeping with the National Historic Preservation Act and the Wilderness Act

- Right now, Categorical Exclusions are filed in the Strategic Planning Office, Wilderness Minimum Tool Determinations are filed with the Wilderness Office, and NHPA documents (XXXs) are filed with Resources Management. Consider combining records so there would be one complete file on each project.

Closed Session

Consider eliminating the closed session.

- The closed session does not make sense. Often, mitigation measures are imposed at the closed session that are not practical to complete. The proponent should be able to be there to discuss final decision.
- Some decision makers will not speak up until the closed session. Decisions should be made with the proponent there.
- The closed session should be abolished. If you cannot be honest at the open session, then something is wrong. If there is a need for further debate, table the project and address it at the Supt. squad
- The purpose of the closed session is misunderstood. The closed session is used to reconcile differences among Division’s specialists, set priorities, and establish management parameters.

Programmatic Categorical Exclusions

Consider directing compliance staff to work with maintenance staff to prepare a programmatic PCH proposal for routine roadwork, buildings and grounds work, and utilities work.

- It would be really useful to prepare one programmatic compliance agreement to cover routine road work such as ditching, brushing, striping, road sweeping, overlays, flushing culverts, replacing signs in developed areas, snow stakes, and delineators.
- It would be really useful to prepare one programmatic compliance agreement to cover routine buildings and grounds work such as minor digging/trenching, repair, re-establishing footings for trash cans, creating new footings for trash cans within developed sites. (Note: To be addressed at October 2002 PCH)
- It would be really useful to prepare one programmatic compliance agreement to cover routine utilities work such as repairs to existing water, sewer line, electric, and high voltage utilities.

Interview Summary (cont'd)

General Staff Comments—General

- Pre-planning is an investment – not just a “green light”
- Compliance and maintenance staffs are team-mates. Both should come to the table committed to getting needed work completed and committed to meeting environmental regulations.
- The Maintenance Division needs help from compliance staff. It is hard for the Maintenance Division to make it through the process alone.
- Maintenance and Resources Management have the same goals under the mission of the NPS. They need to develop trust.
- Upper management needs to trust the professionals they have hired to work toward the goals of the park.
- Pre-approve certain types of work. Assume workers have enough professional expertise to determine whether a project meets the pre-approved criteria
- Give supervisors the authority to make decisions up to a certain level
- When you go into a City or County planning office, they will tell you right then and there exactly what you need to do to move your project through the process. We should do the same.
- Compliance should function like a “help-desk” where you send in your proposal and get a response telling you what you need to do.
- If there is going to be a Planning and Estimating Group in Maintenance, compliance should be integrated.
- There is a serious need for change. Park staff cannot do their jobs because projects do not move through the compliance process.
- Engineers are spending most of their time as compliance people, rather than engineers. Would like to bring the emphasis back to engineering.
- Because it is such a monumental task to bring things through compliance, the NPS encourages retention of poor environmental practices.
- Sometimes the process backs engineers into corners, forcing heavily designed projects that did not truly need to spend the time, energy, and resources.
- The PCH meeting is a waste of time. When I bring a proposal, it often gets redesigned by a team with no expertise.

Cultural Resources

- Compliance with NHPA and other cultural resource protection laws is a primary means to manage cultural resources in the park. In other words, the NPS achieves managing cultural resources through compliance with NHPA. Cultural resource compliance needs to be strongly linked to the resource management division because cultural resource management is built on a foundation linked with compliance.
- The Cultural Resource Team would like to provide/participate in a parkwide training on cultural resource compliance

Cultural Resources (cont'd)

- The Cultural Resource Team has developed guidelines for repetitive and low-impact activities. These guidelines can be easily integrated into NEPA documents (such as Categorical Exclusions) to serve as mitigation measures.
- The Cultural Resources Team would like to develop general guidelines for other activities such as fire, trails, and road work. Staff is not available to produce these guidelines.
- Some projects come to cultural resources staff before they go to PCH and before they are prioritized. Park staff has learned that if they have cultural “buy-in” before PCH, they will have an easier time making it through the process. This puts cultural resources staff in a bind because they do not know which projects are true priorities.

Cultural Resource Compliance Staff is Understaffed

Consider increasing the number of cultural resource staff for operational compliance and routine projects

- Cultural resources oversight is the bottleneck for compliance.
- You can wait for months for a cultural resource specialist to check out your project
- Archeologists should be available for emergency work
- There is no money earmarked for general compliance/Section 106 work generated at PCH. All the staff archeologists are paid for by individual projects. If they are used on PCH projects, this robs the other projects. In addition, several key staff members such as the Historical Archeologist and Museum Curator have been assigned to other duties. More NPS cultural resource staff members are needed to address general compliance issues in the park.

Forestry

Evaluate future compliance needs

- Forestry work is now covered by a variety of environmental documentation—a programmatic Categorical Exclusion (CE) covers general hazard tree removal, a programmatic CE covers hazard tree removal in the River Protection Overlay, and the Fire Management Plan is expected to be cover some future work.. Some work is not covered, such as brushing trees over roads that are prone to ice build-up or vista clearing (you cannot see the San Joaquin Valley from the San Joaquin overlook). The compliance shop and Forestry program should evaluate and process future compliance needs.
- If we commit the time needed to bring all forestry actions under compliance, it will free all of us up to do other work.

Finalize hazard tree determination criteria

- The Resources Management Division and the Forestry Office should meet to evaluate and finalize the criteria used to designate hazard trees. Compliance staff should facilitate the discussion.

Interview Summary (cont'd)

Yosemite Concession Services

- YCS projects are a unique opportunity to accomplish major work that supports the park. When a project comes from YCS to the NPS, they are projects that are:
 - ◊ Approved by YCS management
 - ◊ Funded
 - ◊ Close to being bid and contracted
- Opportunities are being missed primarily because YCS projects cannot make it through the compliance system (primarily cultural resource concerns).
- YCS has a number of projects that need compliance.
- Right now, the Cultural Resource Team is not aware of any concession projects that need cultural compliance oversight. There is a huge workload of concessionaire projects out there “somewhere.” For some reason, projects are not making it through to cultural resource staff.
- NPS cultural resources staff would like to review and transmit cultural resource documentation for concession projects
- There have been instances in the past when the concessionaire has submitted cultural compliance documentation to the NPS that has not been up to standard. The Cultural Resource Team suggests that the concessionaire hire a cultural resource consultant for all projects, rather than try to produce documents in-house.
- Projects are circumventing the system.
- YCS can acquire the expertise to complete environmental review and documentation to regulatory standards.

Environmental Screening Form (ESF)

Upgrade the Environmental Screening Form

- The ESF should be upgraded to reflect the latest information on compliance with the Wild and Scenic Rivers Act— Merced Wild and Scenic River
- The ESF should be separate from a Categorical Exclusion. Categorical Exclusions should have an ESF as well as Categorical Exclusion documentation.
- The Access database that stores compliance information would need to be upgraded to reflect these last two suggestions. Need technical assistance.

Appendix A – Planning Clearinghouse Interview Participants

Participant	Division	Participant	Division
Lisa Acree	Facilitator, Strategic Planning	Amelia Labbe	Strategic Planning
Ed Appling	Roads and Trails	Tom Lambert	Design and Engineering
Bob Brantley	Roads and Trails	Paul Laymon	Utilities
Tony Brochini	Roads and Trails	Tim Ludington	Roads and Trails
Mark Butler	Strategic Planning	Brian Martin	Buildings and Grounds
Butch Castro	Forestry	Dennis Mattiuzzi	Facilities Management
Larry Castro	Forestry	Brian Mattos	Forestry
Gary Colliver	Strategic Planning	Lynn Mattos	Project Management
Don Coon	Utilities	Joe Meyer	Resources Management
Jim Cyr	Roads and Trails	Marty Nielson	Business and Revenue Management
Mary Beth Cyr	Resources Management	Kara Paintner	Fire
Bill Delaney	Project Management	Ken Phipps	Roads and Trails
Marie Denn	Resources Management	Michael Pieper	Design and Engineering
Tony Di Stefano	Resources Management	Paul Pyle	Design and Engineering
Don Evans	Yosemite Concession Services	Jim Reynolds	Utilities
Randy Fong	Project Management	Glen Rothell	Project Management
Dave Forgang	Strategic Planning / Interpretation	Louis Rowe	Safety Office
Don Fox	Design and Engineering	Bill Rust	Business and Revenue Management
Russell Galipeau	Resources Management	Steve Shackelton	Visitor and Resource Protection
Terry Gamble	Buildings and Grounds	Rhonda Soden	Project Management
Karen Glenn	Project Management	Craig Struble	Facilities Management
Larry Harris	Design and Engineering	Steve Thompson	Resources Management
Lora Hawksley	Buildings and Grounds	Dennis Waheed	Roads and Trails
Scott Jackson	Resources Management	Katy Warner	Resources Management
Roy Jacobs	Buildings and Grounds	Jim Whitfield	Utilities
Mark Jones	Buildings and Grounds	Heather Whitman	Administration
Korwin Kirk	Utilities	Mike Wichmann	Project Management
Laura Kirn	Resources Management	Dan Williams	Buildings and Grounds
Karen Kolbeck	Administration	Wiley Wood	Utilities

Appendix B

STANDARD OPERATING PROCEDURES Chapter 1

YOSEMITE NATIONAL PARK

		EFFECTIVE DATE July 1, 1995	DURATION Permanent
TYPE OF DIRECTIVE Operational Procedure	AMENDS	RESCINDS All Previous	SUPPLEMENTS None
TITLE SUBJECT Yosemite Planning		INDEX None	CROSS INDEX # None
SUB-ACTIVITY Planning and Compliance		DISTRIBUTION Parkwide	

PLANNING CLEARINGHOUSE COMMITTEE

Mission Statement of the Planning Clearinghouse Committee

In order to obey the laws and regulations of the United States, pursue reasonable planning methods and processes, coordinate park plans and developments, and seek consensus within the park leadership on matters of park management, this committee, "The Planning Clearinghouse" is established.

The purpose of Planning Clearinghouse Committee is to review and advise the Superintendent on all undertakings that may affect the natural or cultural environment.

The underlying authority of the Planning Clearinghouse Committee is found in National Environmental Policy Act (NEPA), National Historic Preservation Act (NHPA) and associated statutes, regulations, rules, decisions, policies, plans and studies.

The scope of authority of the Planning Clearinghouse Committee is: to implement NEPA, NHPA and all associated guidances; to approve or disapprove proposed: plans, designs, and/or proposals presented to the Committee; to establish working committees; to advise the Superintendent regarding issues and matters brought before the committee.

Procedures of Planning Clearinghouse Committee

1. Action by the Planning Clearinghouse Committee (hereafter called the Committee) is initiated by a project proposal.
2. The Committee will meet the first and third Thursdays of the month throughout the year, if business so warrants.

13. When the design or phase of the design is complete, the leader of the Design Team, with the concurrence of the original proponent, will report to the Committee for a recommended action: rejection, return for further design, or approval for construction.
14. Those projects approved by the Committee for construction will be, where necessary, referred to an interdisciplinary compliance team or the original project proponent for completion of required compliance documents.
15. Upon completion and approval of required compliance documents, the project will be sent to the Superintendent with the recommendation of the Committee. The Superintendent will make a final decision of the project.

Committee Composition

Chair: Chief, Resources Management

Voting members: Division Chiefs and Asst. Superintendent

Committee Secretary: Compliance Officer

The Compliance Officer shall serve as the Committee Secretary and shall be allowed presence and assistance of a staff in both the open and closed sessions of Committee meetings.

The composition of the Design Team shall be recommended by the Design Team Leader with the advice and approval of the Committee.

The composition of the Compliance Team shall be recommended by the Compliance Officer with the advice and approval of the Committee.

Prepared by: _____ Date: _____
Chief, Resources Management

Recommended by: _____ Date: _____
Assistant Superintendent

Approved by: _____ Date: _____
Superintendent

3. The project proposal is submitted to the park Compliance Officer through the Chief, Division of Resources Management. Proposals must be submitted at least ten working days prior to the standing meeting date.
4. Five working days before the meeting, the Committee members will receive copies of the project proposals for information and review.
5. Prior to the scheduled Committee meeting, project proposals will be reviewed by the Superintendent's Office, the Chief of Resources Management, and the Compliance Officer. The project proposals will be classified in three categories: 1) projects that may proceed; 2) projects that need Committee consideration before proceeding; and 3) projects that will need the deliberation of the Committee. The projects will be entered on a meeting agenda under these headings. This is a tentative and non-binding classification.
6. At the Superintendents staff meeting prior to the standing meeting date, the agenda will be presented with a brief oral statement of the proposed projects by the Compliance Officer. Projects that may proceed and projects that need consideration, will be either approved or forwarded to the Committee for deliberation.
7. Those projects approved by the Committee, will be forwarded to the Superintendent with recommendations for final decision.
8. Proposed projects that need the deliberation of the Committee, will be presented in an open meeting of the Committee. The project proponent and any supporting subject matter experts will be allowed to orally present their proposal. The meeting will then be open to question and discussions on the project at hand. The Committee Chair shall have the authority to limit: the time of project presentation, the time of questions and discussions, and the nature of questions and discussions.
9. The open session of the Committee is open to all. Committee members will be given seating preference. The number of attendees will be limited only by the capacity of the meeting room. Competent comment and questions on the proposal at hand will be solicited for information purposes. The Committee Chair will regulate the comments and questions to address the issue at hand.
10. At the conclusion of questions and discussion of agenda items, the open meeting will close and the Committee members will go into a closed session.
11. In the closed session, Committee members will discuss and evaluate each project proposal. The Chair shall guide the discussion. The Committee shall, by consensus, decide to: reject approve for design, approve for construction, or table for further review, those projects on the meeting agenda.
12. Those projects approved by the Committee for design may be, where, necessary, referred to a Design Team. This Team has the authority to establish working groups and sub-groups to meet the specific goals and directions of the Committee for the proposed project.