

Service-wide Strategy for Implementing the No-Impairment Policy

(This strategy was recommended by the No-Impairment Coordinating Committee and approved by the National Leadership Council May 31, 2001)

The Service has a need for more comprehensive guidance that will help us implement Section 1.4 of *Management Policies* in a more consistent way. The following steps will be taken to meet that need.

1. Until the more comprehensive guidance is issued, we will continue to manage the parks to the best of our ability, using the guidance found in Section 1.4 and other sections of *Management Policies*, and any other supplemental materials that may be issued. Managers should understand that the absence of definitive guidance on impairment does not mean that decisions should be delayed or withheld. While it is true that we should proceed with caution, caution has always been called for when a decision might have a major impact on park resources or values. The thoughtful application of all aspects of *Management Policies* will, in almost all cases, lead to decisions that are rational and appropriate. An administrative record showing that all relevant factors were considered will further ensure that our decisions are defensible. To ensure some level of consistency and to enhance learning, structured procedures for sharing information should be employed by all those who are engaged in preparing plans and other documents requiring decisions that may lead to impairments. Where there is an obvious ongoing impairment, action must be taken, to the extent possible within our authorities and available resources, to eliminate the impairment.

2. The Associate Directors for Natural Resource Stewardship and Science, and Cultural Resource Stewardship and Partnership will convene a work group to develop comprehensive guidance on how the Service should implement Section 1.4 of *Management Policies*.

3. The work group will include program managers, scientists and other experts representing a broad cross-section of natural, cultural, and recreational resource disciplines. It will also have strong representation by park managers to provide a “reality check.” In addition, an invitation to participate will be extended to the Associate Directors for Professional Services, and Operations and Education, and to one or more regional directors.

4. The work group will:

- Organize itself to efficiently perform its work.
- Develop criteria/standards that will help us determine when an impact constitutes an impairment of park resources or values.
- Develop criteria/standards and a process for addressing ongoing impairments.
- Clarify how decision-makers should respond when they receive conflicting or questionable advice about whether a proposed action would cause impairment.

- Compile case studies that illustrate how the criteria/standards are applied to real-life situations, and how a park's enabling legislation, planning documents, and other factors are taken into account.
 - Recommend a long-term process for evaluating and improving upon the criteria/standards and adding to the compilation of case studies.
5. The work group's products will be vetted through the No-Impairment Coordinating Committee, which in turn will recommend action by the NLC, as necessary.
 6. The work group's products, once adopted, will be incorporated into a handbook to help all employees understand why the no-impairment policy is important to the long-term viability of the national park system, and how the policy will be implemented. Program managers who are responsible for handbooks and reference manuals on other topics (e.g., cultural resources, natural resources, facility management) will also look for opportunities to incorporate impairment guidance into their documents.
 7. An intranet web site will be established where decision-makers, resource managers, facility managers, planners, trainers, and anyone else with an interest in the no-impairment policy can obtain up-to-date information about what the policy means and how it is being applied to the decision-making process. Among other things, the web site will include a list, compiled by the Associate Directors, of employees with specialized expertise who can be called upon to help superintendents and resource managers evaluate potentially contentious resource issues.
 8. The Training Manager for Natural Resource Stewardship will coordinate efforts within the Training and Development Program to develop a plan for delivering appropriate training on this subject to all segments of the work force. The plan will necessarily be long term, but will also look for opportunities in the short term to orient employees to the no-impairment policy.
 9. Regional directors will focus particular attention on impairment-related findings when approving FONSI and Records of Decisions.