

CITIZEN ADVISORS

And

NATIONAL PARKS

Report on a study for the

National Park Service  
Midwest Region  
Omaha, Nebraska

by

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## II ADVISORY GROUPS: AN OVERVIEW

Perhaps the best place to start is to briefly scan the territory from a distance. This section lays some essential groundwork for the rest of the report by surveying the functions assigned to advisory groups by those who use them -- legislatures, mayors, city councils, administrators, and others -- and defining some "types" of advisory groups that have emerged. Also reviewed are some criticisms of the AG (advisory group) encountered in the literature and in conversations with agency officials. The discussion then narrows to the specific case of the National Park Service advisory group structure and the Federal Advisory Committee Act under which this structure is operated by the NPS.

### FUNCTIONS OF ADVISORY GROUPS

A review of the literature shows clearly that the array of advisory group functions goes far beyond the production of "advice." Among jobs that have been given to advisory groups are the following ( 2 ):

1. Reduction of political heat on an agency. Some believe that opposition to an agency program can be reduced by the publishing of "expert independent opinion" that substantiates the program. In addition, advisory committees are sometimes used to delay action on controversial problems until political heat has died down.

2. Provision of a conduit to and from important clientele. Communications channels between an agency and potentially alienated groups can be kept open via membership of these groups on agency advisory committees.

3. Legitimization of the agency's activities. Especially in the case of those programs which "grate hardest on the citizen," it can be helpful to the agency to be able to point out that the program was specifically proposed by an advisory committee of citizens and experts or, at any rate, discussed and approved by it.

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( 2 ) This list is a composite of functions discussed by the following and other sources: Manes Specter, James Reidel, Project TAP, Anthony Downs, Cronin and Thomas, Daniel Bell, and Bruce Bishop. See Bibliography, p. 83, for full references.

4. Determination of the views of the unrepresented. Some observers propose that agencies should place representatives of otherwise unorganized clienteles on their advisory boards to "plug the gaps" occurring in other representation mechanisms.

5. Enhancement of "elite participation" in formulation of policy. Here it is felt that support of agency programs can be increased by soliciting participation of community leaders in program planning through the mechanism of advisory groups.

6. Creation of a forum for "ventilating negative feelings and putting out fires." In some cases, agencies have used advisory committee members as mediators with angry client groups.

7. Constraint and control of the agency. Advisory committees are often created by legislation pertaining to new programs in an effort to ensure outside oversight of program administration.

8. Relief from political heat on legislators. Advisory committees are used as targets of -- or instruments for -- pressures that would otherwise impinge on the legislator himself.

9. Provision of patronage positions to which politicians can appoint supporters. The prestige associated with national advisory commission appointments gives them value as an incentive for loyal political service.

10. Creation of visibility for issues and generation of support for remedies. The tackling of a problem by an advisory group can be the focal point for increased attention and public debate over the problem and alternative solutions.

11. Service as a catalyst for expansion of other types of citizen participation activities. An advisory committee can host and participate in various public forums -- workshops, small group meetings, etc. -- and bring other participants into the planning process, enhanced by the fact that citizens advisory committees are perceived as less partial than are agencies sponsoring these activities.

12. Benefits to members themselves. Manes Specter (3) has identified the following:

1. Opportunities for public service; outlets for altruistic energies.

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(3) Specter, Manes, "Involving Clients and the Public in Federal Administration through Advisory Committees," in Daniel S. Brown (ed), Federal Contributions to Management, New York: Praeger, 1971, p. 33.

2. Ego enhancement connected with being asked to "advise" high ranking government officials, indicating recognition of stature in professional or political circles.

3. Opportunities for exercise of power in the shaping of important policy.

4. Opportunities of establishing and maintaining "contacts" which are useful in outside endeavors.

5. Educational and personal growth experiences associated with field trips, interactions with knowledgeable persons, involvement in challenging committee projects, and other activities.

This is not to say that a particular advisory group can or should serve all these functions. But the above lists provide an idea of the range of expectations that may be applied by the various actors involved in an advisory group's operations.

#### TYPES OF ADVISORY GROUPS

One way of categorizing advisory groups is according to their duration and task. Manes Spector (4) has lumped them into four types:

1. The general advisory committee. This type is intended to provide the agency with continued advice on general agency programs and policies. It has no time limitation, and its tasks are varied.

2. The continuing limited-function advisory committee. This type is also not limited in time but is limited in the scope of problems on which it provides advice; for example, the Advisory Committee on Teacher Training, attached to the U.S. Office of Education is a "limited-function" group.

3. The time-limited special task advisory committee. This type exists only for the completion of a specified task, after which it is officially disbanded. The President's Commission on Civil Disorders is an example.

4. The industry advisory committee. This type is composed entirely or in part of representatives of a particular industry that has important dealings with the government. The "grazing advisory committees" of the U.S. Forest Service, composed of representatives of cattle interests to advise on range management in Western states, are typical of this type.

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(4) Spector, ibid, p. 23

Another way of classifying advisory groups is according to the underlying political motives of the authorities who create them. James Riedel (5) reveals a touch of cynicism in his list of four categories:

1. "Advisory" Advisory committees. This type is actually intended to provide advice, and the agency is more or less willing to be directed by the conclusions of the committee.

2. "Supportive" advisory committees. This type is created to lend an "added aura of authority" to agency policies. The agency appoints sympathetic outsiders, knowing they will reach the appropriate conclusions, thereby pre-empting opposition to agency programs.

3. "Put-off" advisory committees. This type is created to defer action in the face of intense pressure for a decision. The agency carefully selects members whom it knows will never agree or will never reach an acceptable conclusion, embroiling the issue in endless debate and deflecting the heat from the agency.

4. "Put-on" advisory committees. This type is created to lend credibility to an agency decision likely to be received as "crassly partisan, or partial to a person or group." Modified "put-on" advisory groups are created to generate responses to "clamors for ill-defined action" or problems with which the agency knows it is not prepared to cope. This type of committee is carefully orchestrated in the process of appointments and in the feeding of information so as to produce the "right decision" meaning either the agency-proposed solution or an alternative that is too vague or complex to be implemented.

As with most classification schemes, these categories are more useful for ordering complex information than for describing a particular case. Actual advisory groups are rarely created with the precision of purpose implied above, and are likely to be mixtures of several types.

#### SOME PROBLEMS WITH ADVISORY GROUPS

Many criticisms of the advisory committee mechanism are raised in the literature and in discussions with persons who are familiar with committee operations. The following is a brief sampling:

1. Inefficiency. A major complaint of agency officials and legislators is that advisory committees consume a lot of time and money and yield little in the way of useable advice in return. Furthermore, skepticism about committees in general -- advisory or otherwise -- is rooted to the feeling that committees are inherently clumsy, inefficient, and uncreative: "The camel is a horse designed by a committee."

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(5) Riedel, James A., "Citizen Participation: Myths and Realities" Public Administration Review

2. Challenges to agency authority. "Advisory committees tend to suffer from what I call the 'Board of Directors Syndrome'," an NPS official told me. "They want to not only advise on policy but to actually make the policy itself, as if they were a board of directors." A related threat to authority is the "abrogation of decision making":

There is the ever present temptation for officials to abdicate their responsibility and delegate to the advisory group the power to decide important matters of public policy which would not be delegated ( 6 )

3. Limitations of members. Agency officials often feel that citizen advisors are technically unqualified, and/or hampered by severe time constraints because of other commitments. The issues on which they "advise" are too complex for members to understand without excessive staff input:

The problem with these committees is that they only know what we (the agency) tell them, and their response is entirely predictable. I'd rather put the same amount of staff preparation into an in-house analysis of the problems. I'm sure that we could come up with a better solution in a lot less time than we get through the committee.

- an NPS Regional Director

Furthermore, agency officials often suspect the motives of advisory committee members, fearing they are more interested in prestige, VIP treatment, and entertaining field trips than they are in the agency's problems.

4. An equal amount of criticism is levelled by observers relecting citizens or interest group perspectives. Much of it concerns representation -- advisory committees are seen as "loaded" by the agency or as "elitist" in their tendency toward inclusion of "blue ribbon" citizens and exclusion of poor people and minorities. A related criticism concerns a lack of outside access to advisory committee activities due to closed meetings and unpublicized or unscheduled activities.

5. Once an advisory committee has generated some recommendations, its advice is ignored, critics claim. Since, according to this view, the latent reasons for creation of an advisory committee are usually "to treat the politics of a situation rather than the situation itself,"

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( 6 ) - Shaller, Lyle E., "Is the Citizen Advisory Group a Threat to Representative Government?" Public Administration Review, Vo. 24, (September 1964) p. 179.

their actual product -- usually a report -- is too often regarded as quite beside the point by the authorities they are trying to help.

It can be seen from the diversity of functions and the problems identified by various critics that the advisory group mechanism is not a simple one. Advisory groups often operate in an atmosphere of uncertainty; in fact, they are often created in the first place to plug gaps in existing mechanisms for dealing with high-uncertainty situations. So it is not surprising that opinions differ over the handling and success of advisory groups. We will examine these differences in more detail later in this report as we explore the topics of membership, productivity, and impact, but first it is necessary to describe the National Park Service advisory group structure on which the analysis is based.

#### NATIONAL PARK SERVICE ADVISORY GROUPS

Three "levels" of advisory groups are operated in the NPS, corresponding to the organization of the agency into national, regional, and field units.

##### National-Level Advice: The Secretary's Advisory Board

The "Secretary's Board" (recently renamed the National Parks Advisory Board) was created in 1935 as a provision of the National Historic Sites Act (Appendix, p. 85), with the mandate to

... advise on any matters relating to national parks and the administration of this Act submitted to it for consideration by the Secretary. It may also recommend policies to the Secretary from time to time pertaining to national parks and to the restoration, reconstruction, conservation, and general administration of historic and archaeological sites, buildings, and properties. (16 USC sec. 463)

The Board's 11 members must, according to the law, include "... representatives competent in the fields of history, archaeology, architecture, and human geography." It meets twice a year in Washington, D. C. and once a year in field locations. Staff support is provided by the NPS Washington Office. Although the Board officially reports to the Secretary, its advice pertains mainly to matters handled by the NPS, and it is this agency which has direct responsibility for responding to the Board.

##### Regional-Level Advice: The NPS Regional Advisory Committees

All but two of the nine NPS Regions operate regional advisory committees to "... advise the (Regional Director), National Park Service, on programs, policies, and such other matters as may be referred to it by the (Regional Director)," The membership of each committee consists of nine private citizens appointed by the Secretary

of the Interior for three-year terms (a regional committee charter is in the Appendix, p. 88 ).

As observed later in this report, the functions of regional committees and criteria for membership vary from region to region, depending on the needs and style of the regional staff and the composition of the committee. They typically meet for one to four days at a time, two to four times a year. One of these meetings takes place at regional headquarters and the rest are scheduled in field areas.

#### Field-Level Advice: Park Advisory Commissions

About seventeen NPS park areas operate park advisory commissions, as required by the laws establishing these areas. In recent years Congress has frequently included provisions for a commission in the bill creating a major new area (that is, an area of national park or recreation area magnitude). The legislation typically calls for 5 to 15 members to be appointed by the Secretary of the Interior from recommendations by a variety of sources including municipalities near the park, major interest groups, State Governor's offices, and "the general public." The mandate given these commissions is typically vague; for example, the only explicit purpose of the Indiana Dunes National Lakeshore Advisory Commission is that

... the Secretary or his designee shall, from time to time, consult the Commission on matters pertaining to the development of the Lakeshore and on the provisions of Sections 4, 5, and 6 of this Act.

(P.L. 89-761, Sec. 8(e) - see Appendix, p. 86)

Most dealings of a commission are with the park Superintendent (the Secretary's designee), but occasionally the group will send its advice to the Secretary. Most commissions meet for a few hours three or four times a year, but a few commissions have met as many as nine times in a year.

#### Other NPS Advisory Groups

In addition to the advisory groups described above, for which the NPS is the primary agency being "advised," there are some related advisory groups which do not fit any neat category. For example, the Advisory Council on Historic Preservation has a substantial staff who are on the NPS payroll, but the Council reports to the President and Congress and operates quite independently from the NPS. Another case is the Consulting Committee for the National Survey of Historic Sites and Buildings, created by the NPS on the advice of the Secretary's Board to screen the hundreds of proposals for new National Historic Sites and Landmarks.

Other "miscellaneous" NPS advisory groups, not within the scope of the present study are the following:

Advisory Board on the San Jose National Historic Site

Committee for Preservation of the White House

Historic American Buildings Survey Advisory Board

Historic American Record Advisory Committee

Hot Springs National Park Examining Board for Technicians

Hot Springs National Park Registration Board

Committee for the Recovery of Archeological Remains

National Capitol Memorial Advisory Committee

#### THE FEDERAL ADVISORY COMMITTEE ACT

All NPS advisory groups are operated under the provisions of the Federal Advisory Committee Act, Public Law 92-463, enacted by Congress in 1972 to place tighter controls on the growing number of federal advisory committees. (See Appendix, p.89 for a copy of the Act.) This law has two main provisions:

1. Controls on the cost of maintaining advisory groups. The Act calls for annual review and reporting of both the costs and the benefits of all federal advisory committees to the Office of Management and Budget, as a means of keeping tabs on the usefulness of such groups. It also automatically disbands each group at the end of two years unless the group is specifically renewed by the agency or unless otherwise specified by law. Standards are set for compensation of members, travel expense reimbursement, and other cost-related matters.

2. Controls on the influence of advisory groups. The Act stipulates that all groups shall be "advisory only" unless otherwise stipulated by law or Presidential directive, and that decision-making authority rests securely within the Federal Government. It requires a "committee manager" to be appointed from the agency to provide oversight from the government's viewpoint. The Act also provides for public access to committee meetings and proceedings through explicit requirements regarding advance publication of meeting notices, open meetings, publication of minutes, and other aspects of committee operations.

This piece of legislation was enacted in response to many of the problems reviewed earlier in this section. That it did not solve them becomes clear as we now take a closer look at the experience of the NPS.