



United States Department of the Interior

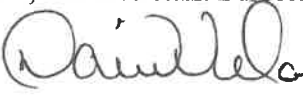
NATIONAL PARK SERVICE
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Memorandum

To: Regional Directors, Associate Directors, and Assistant Directors

From: Acting Deputy Director, Operations 

Subject: Coordination and Communication on External Review and Comments

This memorandum provides guidance for continued National Park Service (NPS) engagement and participation in other agencies' proposals and projects that may affect park resources and values, including access to park resources or recreational opportunities. The intent of this guidance is to ensure NPS comments follow Department of the Interior (DOI) Departmental Manual 516, Part 4, Review of Environmental Impact Statements and Project Proposals Prepared by Other Federal Agencies,¹ and the guidance outlined in Environmental Review Memorandum (ERM) 10-10, *Improving Environmental Review Assignment Comments*.²

The NPS has a responsibility to protect park resources and values from actions proposed by other agencies and organizations. We have made significant progress in working with other agencies and States to improve Federal response times and ensure NPS managed lands and resources are protected. In order for the NPS to continue to engage effectively, it is critical that we pursue coordinated, collaborative, and science-based approaches to reviewing proposals, developing comments, and communicating with lead agencies and States.

EARLY COORDINATION

Effective early coordination will significantly reduce the amount of time and effort needed to review and comment on partner agency documents, which has become increasingly challenging as agencies work to streamline environmental reviews. Review and comment times for other agencies' plans and proposals are shorter and, in some cases, may prevent NPS from being able to meet agency deadlines. Early coordination is the most effective way to ensure NPS interests are considered by the lead agency and efforts are made to address potential impacts to park resources and values.

¹ https://www.doi.gov/sites/doi.gov/files/elips/documents/chapter_13.pdf

² https://www.doi.gov/sites/doi.gov/files/uploads/erm_10_10-508_compliant_improving_environmental_review_assignment_comments_0.pdf

Parks and regional offices should review their procedures for engaging and collaborating with partner agencies early in planning processes. Parks are encouraged to participate in gateway community planning and partnership arrangements, and continue to develop good working relationships with local partner agency representatives. Regions are encouraged to develop good working relationships at the State or regional level to further assist parks in their efforts to collaborate with partner agencies.

COMMENTING PROCESS

Providing effective comments to other agencies and organizations is paramount to ensure NPS managed lands and resources are protected. ERM 10-10 provides guidance to assure that comments are pertinent, relevant, address Departmental authorities, and note specific concerns and recommendations. Comments should include appropriate management level review to ensure they are within NPS's statutory authorities and special expertise. Regions should incorporate the guidelines outlined in this ERM in conducting their reviews.

Comments to other agencies should be substantive, limited to areas of NPS jurisdiction and/or special expertise, and presented in appropriate tone and format. Comments should focus on the facts, and be objective, constructive, and solution-oriented.

NOTIFICATION PROCESS

The following process applies to NPS comments on other agencies' proposals and projects that relate to DOI priorities, including energy development and associated infrastructure, utility related infrastructure, broadband or telecommunications access, access to park resources or recreational opportunities, and wildlife corridors. WASO notification is needed to ensure that NPS comments receive appropriate senior level awareness and coordination.

- When comments are being prepared for these types of projects, parks, through the Regional Office, must provide notice in the weekly report with a copy to nrss_ssc@nps.gov. Notice should be provided at least three weeks prior to submission of the written comments, if possible. The notice should identify the lead agency, include a brief description of the project, the deadline for NPS comments, and a summary of any substantive issues or concerns raised in the NPS comments. The notice should also indicate if the NPS comments are being compiled by and submitted through the DOI Office of Environmental Policy and Compliance (OEPC). Parks should be prepared to provide the comments to WASO upon request.
- If comment deadlines do not allow for a three-week notice, the Regional Director or designee must send an email to nrss_ssc@nps.gov as soon as possible. The email should identify the lead agency, include a brief description of the project, the deadline for NPS comments, a summary of any substantive issues or concerns raised in the NPS comments, and if comments will be compiled by and submitted through OEPC. Parks should be prepared to provide the comments to WASO upon request.

We continue to rely heavily on the expertise and professional judgment of parks, and encourage anyone to reach out to staff in our regional and Washington offices who are available to provide technical and policy assistance as needed.

Thank you for your continued dedication and work to protect parks, provide meaningful visitor experiences, and support Department goals and interests.
