

Feedback to the Reframing SCORP Position Paper

February 28, 2012

Comment 1

I appreciate the time and effort the Committee and the Board devoted in the development of “Reframing the Role and Relevancy of Statewide Comprehensive Outdoor Recreation Plans”. There are some very good recommendations such as dedicated funding, Federal Interagency Council and technical assistance. However, as you know I am very supportive of the state agency recreation planners and their continued input into park planning and operations. I feel the report does not provide the recognition of their importance and need especially within these fiscal times. This should be a **priority** for NARRP that is not evident. In addition, I feel that the reality of how things are done within state agencies was not fully considered in several of the recommendations. I also consider the SCORP not as a one time document but part of a continuing planning process.

Without surveying all the states, I image that most, if not all the state planners are multi functional with SCORP being one of their functions. Many planning bureaus are also responsible for open space planning, trails, master planning, project reviews, FERC, surveys, and other functions. This has the benefit of having the policies, actions, needs and trends identified in SCORP considered within these other functions and visa versa. As such, this creates grey areas in defining what tasks and/or products are for SCORP or are for multi-functional agency purposes.

Recommendations:

1. SCORP Planning Cycle

The 10-year cycle is too long and does not reflect that SCORP should be part of a continuing planning process. It could be interpreted that the “rigorous” planning process would only occur 2 to 3 years prior to the due date for the document. Administrators could see this as a document for eligibility and not for providing statewide guidance that should be considered on an ongoing basis. NARRP should **not** be promoting this. The analysis and data basis used for SCORP are also used for other planning initiatives. In addition, elements that are utilized for the SCORP such as maintaining facility inventories (info and GIS) cannot be developed or updated, especially for larger states, within a one or two year period. Even more important, planners are important for the promoting and incorporating the policies, trends, programs and actions identified within SCORP are considered within the park systems (federal, state and local) within a state. A focus of the report should be on the importance of SCORP within the day-to-day and long term planning and operation of park systems.

The 10-year cycle can also have the impact of loss of institutional memory that is becoming a greater issue with downsizing. As a result, you are basically starting at ground zero each time you start the process. The usefulness of the information that is only several years old is sometimes questioned. The worse case scenario is to have reports produced and sit on a shelf.

2. Line-Item Budget for SCORP Planning Grants

The line-item budget for SCORP is good but limiting this to the 2 to 3 years prior to due date for the SCORP document does not support the continuing planning process or the continuing input by park planners. Again, this gives the perspective that SCORP is a stand along, one time document instead of a periodic document responding to ongoing surveys, data basis and analysis. It is recognized that additional funding is required to produce the plan. Even the use of consultants may be difficult due to the selection and approval processes that exist within some states. There is a need to use and analyze the information developed on a continuing basis. The states should have the flexibility to use LWCF funds for surveys, analysis and studies in support of SCORP on an annual basis. Again, this would be at the discretion of the state.

3. LWCF Monies

It is good to have better federal agency participation and coordination of the development and maintenance of recreation systems within a state and for inter-state efforts. This will vary from state to state based on the level involvement for a federal agency within a given state. The SCORP can provide the mechanism promote this on both the federal and state level. Recreation is unique in that there are many recreation agency providers and non-recreation mission agencies that are involved in recreation.

4. Letter from the Secretary of the Interior to State Governors

A letter from the Secretary of the Interior is good but the timetable does not reflect the realities of how state government works. A letter in year eight does not provide enough time to develop contracts, hire staff, conduct analysis and prepare the document if the state agency has not already taken action. It does reinforce the importance of SCORP at the highest state level.

5. Federal Interagency Council on Outdoor Recreation

This is good at the federal level but should also be recommended at the state agency level. The SCORP "continuing planning process" would be a good avenue to make this happen.

6. Technical Planning Assistance

This was once part of the meetings by NPS with the state planners within their respective regions. This group should provide guidance but not take the place of state resources. The goal should be educate and train state personnel in what ways tasks can be accomplished. The actual work should be done at the state level. Administrators can view this as a reason for not having planning staff.

7. Outdoor Recreation and Conservation Cooperatives

This should be an ongoing process and not just once every 10-years for a state. This would foster the recommendation and actions within SCORP. Again, NARRP should be recommending similar cooperatives at the state level.

8. Name of SCORP Plan

Many SCORPs are currently quite diverse. The danger may be that they become too diverse and not focused enough and thereby losing their significance. As for the name, what works for a state is fine.

9. Use of Spatial Analysis

Spatial analysis has been used by most planners and should be encouraged. On one hand the report encourages spatial analysis but does not recognize the resources required to develop and maintain such systems. I consider this as a part of the continuing planning process that should be eligible for funding. This cannot be expected to occur within the 2 to 3 year process recommended in the report.

10. Content of a SCORP Plan

This will be determined on a state by state basis.

11. SCORP Planning Options

Although this may appear to be a reasonable approach, there is a concern that state administrators will likely take to least option to get the maximum return since eligibility or grant funding is not impacted. NARRP should be promoting states and the federal government to support a comprehensive planning process. The chart looks fine but does not reflect the realities of state agency – hiring staff, contract process, budget approval process, etc. This impacts when work actually starts and the completion date. There are also time requirements that are not identified in the cart such the environmental review processes which can take up to 6 months and public input, which takes time, should be encouraged. I also that believe that some of the elements are on-going functions such as development and maintenance of info and GIS data basis that support the assessment process. These can be done within the timeframes providing they already exist.

I am not sure how the various funding level were derived. For some states, all the LWCF funds went into capital projects and not to support SCORP. In such cases, state funds were used for SCORP. To give the impression that a SCORP can be done for \$50K is unrealistic. That may support an entry level planner and that is about it.

12. Principled SCORP Planning

No comment

Given all of this, I feel NARRP needs to provide input but we have to careful not to undermine the state planners and comprehensive process that we should be supporting.

Comment 2

SCORP is obsolete. Under the current funding allocation, NPS should be content with a state's documentation or statement of what the money will be used for and why – maybe a two-page application. Dreams of fully-funded LWCF will remain just that – dreams.

Comment 3

Recommendation 5.3 – While we recognize the need to align with the President's AGO priorities, those are quite temporary. SCORP is a much longer commitment than a transient set of priorities with political motives.

NARRP's Recommendations

1. A planning cycle of 10-years is too long in most settings. The 5-year cycle has been workable at the local level and should be retained.
2. Acceptable, but not essential
3. This recommendation has the flavor of "federalism" when planning is crucial to the state. While federal funding for planning would be great, it is not the only way to achieve the commitment to statewide planning.
4. Such a letter would be valuable and give credence to the SCORP process.
5. If such a Council were created, it would likely have associated costs. This would decrease the available funding for grassroots planning.
6. This recommendation is extremely offensive! Technical expertise is available within states and it is the grassroots state level planning that is most appropriate.
7. See comment on #5.
8. SCORPs have become part of the vocabulary for most planners. The title is quite descriptive.
9. Contemporary planning must include spatial analysis. We would concur.
10. These elements of content and many more are appropriate. Content will likely vary from state to state as do environments, economies, cultures, and resources.
11. Planning options should be determined at the state-level. Let those who must live with the plan determine its contents.
12. One cannot disagree with principled SCORP planning.

In Oklahoma, we have had a great partnership between the state agency (Oklahoma Tourism and Recreation Department) and a state university (Oklahoma State University) for development of the five-year SCORP. There has been a state commitment to the process regardless of funding. That process has worked well and should be allowed to continue.

Comment 4

I appreciate the opportunity to have my staff review the September 2011 position paper *Reframing the Role and Relevancy of Statewide Comprehensive Outdoor Recreation Plans*. The report is thoughtful, relevant and well organized. Many of the recommendations offer opportunity for continuous, integrative planning for outdoor recreation.

Over the years, Virginia has been supportive and successful in achieving this type of planning for outdoor recreation. The partnership with the America's Great Outdoors (AGO) is encouraged; however, it is recommended that the alignment with the AGO be elective so that the statewide SCORP process would continue to set the direction, thereby insuring local, regional and state needs remain a priority in outdoor recreation planning and resource allocation.

Based on staff review, please consider the following comments related to the *Reframing the Role and Relevancy a/Statewide Comprehensive Outdoor Recreation Plans*.

- In general, the report does not clarify how the SCORPs contribute to the America's Great Outdoors (AGO) initiatives. We understand that in some cases that SCORP and AGO goals will align. However, should it be a goal for each state to meet the AGO goals if the state's outdoor recreation needs do not fall within the AGO priorities? State goals should continue to be based on state needs assessments.
- Page 5 - 1. The report states a desire to move to a ten-year cycle for SCORP publications with a mid-term SCORP update in year five. Without a better description of what the five-year update is expected to entail, a ten-year cycle may be too long. Outdoor recreation trends are fast changing and a ten-year review could affect SCORP implementation due to administration changes during that time.
- Page 6 - 5. What does it mean to "prepare a national & state profile"? How will this information be used (i.e. Will profiles be used to determine LWCF funding allocations?)
- Page 8 - 11. Prior to making recommendations for SCORP planning options, it would be preferable to determine the percentage of states currently producing SCORPs equivalent to Tier 1 and Tier 2 analysis.
- Theoretically, it makes sense to do a Tier 3; however, in reality, coordination between states would involve significant resources and time that may not be available even with the assistance of NPS planning staff.

Should the development of Tier 3 move forward, the following questions are raised:

- Would interstate projects receive funding priority over other state projects?
- How would interstate projects be balanced by projects that may be more meaningful to meeting state outdoor recreation needs?
- How would criteria for funding be established for interstate projects?
- Geographically, how would interstate partners be identified? For example, in Virginia the western part of the state often partners with West Virginia, Kentucky and Tennessee, while the eastern portion of the state partners with North Carolina, Maryland and the District of Columbia. While Virginia has a history in working with her neighboring states on projects like the Southeast Coast Paddling Trail, the Captain John Smith Trail and at Breaks Interstate Park, these projects are limited to one recreation focus and are project specific. From a planning perspective, the integration of all aspects of the SCORP may be cumbersome due to the breadth of topics covered in the SCORP and the differences of emphasis for neighboring states.

Comment 5

Submitted by NASORLO (Participating: Doug Hofer, Becky Kelley, Antoinette Norfleet, Tim Hogsett, Dana Legard, Susan Moerschel, Kendall Sommers, Domenic Bravo, Doug Eiken)

Rec 1 – planning cycle

Comment: No objection to a 10-year cycle – could align with census; align with some state requirements for local parks and recreation plans. Support a 5 year update that is no more than ‘audit’/status report on implementation actions. And, the update should be optional for states. Do not support a detailed 5 year interim plan.

Recommendation: NASORLO agrees with the 10-year time frame for SCORP planning. A lengthier planning timeframe will result in reduced planning costs, wider ranges in which to accomplish specific goals, and allow states to align planning functions with census data collection. Plan updates should be flexible and optional; if states chose a 5 year update that it constitute an ‘audit’/status report on implementation actions.

Rec 2 – Line-item budget

Recommendation: States must have the option to determine the funding level they choose for SCORP research and development. Funding level also relates to #12 max funding level.

Rec 3 – LWCF monies

Comment: Concern that a requirement for federal participation is heavy-handed and could lead to federal agencies dictating SCORP process. NASORLO acknowledged the usefulness (yet difficulty) of having fed land managing agencies participate in the SCORP process. When fed agencies participate, it should be to gain value in delivering outdoor recreation opportunities. Create symbiotic value for both states and Fed agencies from the SCORP findings for action implement actions.

Recommendation: Federal participation is important, but there is a need to affirm that SCORPs are State plans and it is preferable that representative of ALL outdoor recreation agencies/providers actively participate in plan development and implementation.

Rec 4 – Letter from DOI Secretary

Recommendation: NASORLO does not see the value in letter of this nature from the DOI Secretary. It is the responsibility of the State Liaison Officer to inform and brief Governors on LWCF matters. Continuing to maintain flexible yet current and relevant planning standards/functions is vital; mandatory planning process directives will not reflect the diversity of our 50 states.

Rec 5 – FICOR

Recommendation: Methods for gathering outdoor recreation participation should be left to States to determine. Use of NSRE data, for example, is an approach. However, this data has proven to not be valuable in states that have developed more detailed methodologies to attain outdoor recreation participation and trend data.

Rec 6 – Technical planning assistance

Comment: While there is concern that this element would come off the top of stateside LWCF apportionment, in this economic climate it is not likely that NPS will gear-up staffing to provide technical planning assistance. This step creates another level of bureaucracy. Also concern that technical assistance staff should/must be qualified and have had experience in direct SCORP processes.

Recommendation: In the current economic climate, NASORLO does not recommend establishment of NPS-staffed SCORP technical assistance regional or centralized teams.

Rec 7 – Outdoor rec & conservation cooperatives

Comment: Federal agencies are not required to participate in SCORP processes, nor are they required to implement actions within federally managed lands. If federal agencies are utilizing SCORP findings they might be more likely to participate in the production of the SCORP itself.

Recommendation: NASORLO supports cooperatives or multi-agency collaboratives and encourages FICOR to insist on local participation and action implementation. Federal agencies are required to consult and use SCORP findings/actions on federal lands and within fed agencies.

Rec 8

Recommendation: NASORLO supports state flexibility to name SCORPs.

Rec 9 – Spatial Analysis – GIS

Comment: A NASORLO poll of states (2009) gleaned this: about 25 states were using GIS (to some degree) to track LWCF investment data. LWCF Washington Office must equip itself with GIS capabilities.

Recommendation: GIS is a powerful tool supported by NASORLO for SCORP analyses; to monitor, evaluate and manage LWCF-related properties and investments; and for related park and recreation planning and analyses functions.

Rec 10 – Content

Recommendation: The content list offered by NARRP should not be construed as a check list for SCORP requirements. This list must, like the current LWCF manual, give states the flexibility to address these and other relevant topics valuable to states. States should not be required to demonstrate why a topic (from the list) is not addressed in SCORPs.

Rec 11 – Planning Options

Recommendation: Tiered approach suggested by NARRP is logical and should remain a choice for states. The Planning options introduction should address that states may perform its planning functions combining various elements from the different tiers; states should not be restricted to plan within a single tier.