

NATIONAL PARK SERVICE

Commercial Services Program

The purpose of the NPS Commercial Services environmental audit program is to support Department of the Interior (DOI) and NPS policies, guidance, and requirements to conduct environmental audits of all national park facilities and operations, including those provided by concessioners.

Commercial Services environmental audits are one tool used to evaluate concession facilities and services for compliance with environmental laws, and serve as a means to educate concessioners and NPS staff about environmental management.

An environmental audit is conducted in order to:

- Fulfill DOI and NPS policy requirements;
- Assist concessioners in evaluating existing environmental programs;
- Recognize best management practices (BMPs) already being implemented, and identify new BMP opportunities that may exist;
- Recognize exceptional practices that demonstrate environmental stewardship and management;
- Identify and understand applicable federal, state, and local environmental requirements; and
- Recommend corrective actions and compliance assistance resources.

Environmental audits ensure:

- Compliance with all applicable environmental requirements;
- Implementation of appropriate best management practices;
- Promotion of sustainability; and
- Awareness and accountability for environmental management.

Program Authority

DOI policy on environmental auditing contained in Departmental Manual 515 Chapter 2 (DM 515 Ch2) directs the NPS to develop and implement an environmental auditing program for "all land, facilities and operations." This policy has been interpreted to include concessioners and other third parties operating in national parks.

The Director of the National Park Service directed the development and implementation of an audit program that complies with U.S. Environmental Protection Agency (EPA) regulations and DOI policy in a memorandum dated March 30, 1998. The NPS Environmental Audit Program (EAP) is incorporated into NPS policy through Director's Order (DO) 30A. Promulgation of this DO is pending. The policies and procedures for the NPS EAP Operating Guide were originally issued in May 1999, are updated on a regular basis, and most recently were updated in 2006. The NPS EAP specifies that concessioner audits will be conducted in conformance with the Service-wide program, and managed by the Washington Office of the NPS Commercial Services Program. The Commercial Services Program has developed guidance titled "NPS Commercial Services Program Environmental Audit Operating Guide" (Guide) which clearly defines and details the purpose, criteria and processes for conducting environmental audits of concessioners operating in national parks. This Guide is undergoing legal review; once the review is completed, the Guide will be finalized and posted ????.

Audit Criteria

Audit criteria are found in the laws, regulations, policies, or other standards against which concessioners are evaluated during an audit. Environmental audit criteria applicable to concessioners are specified in the NPS EAP Operating Guide. These criteria include:

- Federal laws, as specified in DM 515 Ch 2.
- Applicable Executive Orders (EOs) regarding environmental management (e.g., EO 13423, Strengthening Federal Environmental, Energy, and Transportation Management).
- Federal regulations authorized under the above-referenced federal environmental laws and EOs and administered by U.S. Agencies such as the Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), and the Department of Transportation (DOT) in accordance with the relevant authority.
- Applicable state environmental laws and regulations that support federal audit criteria. Where the state environmental requirements are more stringent than the federal environmental requirements the state requirements will supersede the federal requirements.
- Applicable regional and local environmental codes and ordinances that relate to federal audit criteria. Where the regional and/or local environmental requirements are more stringent than state or federal environmental requirements the regional and/or local requirements will supersede the state or federal requirements. For instance, regional boards and/or authorities may establish more stringent air quality and/or water quality standards; and the local fire marshal may have specific codes for siting, construction, and operation of aboveground fuel storage tanks.
- Applicable DOI, NPS, and park policies and procedures, which include Department Manual and other DOI policies, NPS Management Policies, and DOs.
- Environmental management systems as described in Director's Order 13A on Environmental Management Systems, ISO 14001, and other standards governing environmental management.
- Concession contract requirements. Concession contracts often include environmental requirements which vary by individual contract.

Best management practices (BMPs) are identified when the audit program periodically reviews federal government, industry, association, state and local government, and other organization BMPs. Only those that are applicable are used based on the type and complexity of the relevant commercial services in parks. To the extent possible, the audit program references BMP sources that are specific to the concession service type. In some cases, documented BMPs from third-party sources that are not specific to the concession service type are cited because they still provide useful environmental guidance for concessioners. In cases where a BMP is not documented by a specific service type or other third-party source, but the program has identified it as reasonable and appropriate, Commercial Services will identify itself as the source of the BMP.

Audit Schedule

All concessioners operating in national parks must undergo a baseline environmental audit by the NPS Commercial Services Program. Following the baseline audit, each concession will undergo a routine environmental audit at least every 5 years. Every year an environmental audit schedule is developed to determine the audits conducted that year. When developing this schedule, four principal criteria are used to determine which concessioners will be audited. The criteria are:

1. Contract expiration dates and prospectus due dates;

2. Park, region and/or concessioner requests for an environmental audit;
3. Size of concessioner facilities and services, and potential impacts those services may have on park resources; and
4. Location of parks and concession facilities within that park.

If you have any questions please contact us through the GreenLine phone line at (303) 987-6820 or the GreenLine email NPS_Greenline@nps.gov.