

# OFFICE OF THE STATE INSPECTOR GENERAL

Department of Conservation and Recreation  
State Park Maintenance

*Performance Audit*  
March 2025



Michael C. Westfall, CPA  
State Inspector General  
Report No. 2025-PA-006



*COMMONWEALTH OF VIRGINIA*  
*Office of the State Inspector General*

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March 27, 2025

The Honorable Glenn Youngkin  
Governor of Virginia  
P.O. Box 1475  
Richmond, VA 23219

Dear Governor Youngkin,

The Office of the State Inspector General (OSIG) completed an audit of the Department of Conservation and Recreation Division of State Parks. The final report is attached.

OSIG would like to thank Director Wells and his staff for their cooperation and assistance during this audit.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael C. Westfall".

Michael C. Westfall, CPA  
State Inspector General

cc: The Honorable John Littel, Chief of Staff to Governor Glenn Youngkin  
Justin Velez-Hagan, Deputy Chief of Staff to Governor Youngkin  
Kate Stockhausen, Assistant Deputy Chief of Staff to Governor Youngkin  
Stefanie Taillon, Secretary of Natural and Historic Resources  
Corey Scott, Assistant Secretary of Natural and Historic Resources  
Harry Schwab, Assistant Secretary of Natural and Historic Resources  
The Honorable Alfonso H. Lopez, Senate Chair of the Agriculture, Chesapeake, and  
Natural Resources Committee

The Honorable David W. Marsden, House Chair of the Agriculture, Conservation, and Natural Resources Committee

Matthew Wells, Director, Department of Conservation and Recreation

Frank Stovall, Deputy Director for Operations, Department of Conservation and Recreation

Melissa Baker, Division Director, Department of Conservation and Recreation

Eric Surratt, Internal Audit Manager, Department of Conservation and Recreation

Staci Henshaw, Auditor of Public Accounts

# State Parks Maintenance

## What OSIG Found

### Deferred Maintenance Listing Requirements Need Strengthening

The Division of State Parks (DSP) has not provided clarity across the agency regarding purpose, goals, objectives or processes related to the management of the deferred maintenance program. There has been no consistent guidance on how to quantify or prioritize deferred maintenance needs, resulting in discrepancies between deferred maintenance backlog estimates in the field and in the central office. DCR estimated \$364,000,000 of deferred maintenance needs as of January 2024.

### Routine, Preventative, and Repair Maintenance Activities are not Consistently Monitored

DSP leadership has not developed standardized processes for monitoring and documenting routine, preventative, and repair maintenance activities across state parks, leading to inconsistent practices. The absence of standardized procedures for monitoring and documenting maintenance has resulted in different approaches across parks, such as verbal instructions, paper checklists, daily logs, and use of application software.

### DSP Lacks a Structured Process for Completing Inspections of State Parks

DSP lacks a structured oversight framework for state park maintenance, which weakens the ability for the agency to ensure state parks are properly maintained. DSP identified the Park User Perspective (PUP) form and annual building inspections as formal tools district managers use to assess park performance and verify that maintenance tasks are being completed. These tools support the broader goal of enhancing the management and sustainability of state parks. Six of the seven parks (86%) had not undergone a PUP inspection since July 2022, and all seven parks (100%) lacked documentation of annual building inspections.

Management concurred with all six findings and plans to implement corrective actions by June 30, 2027.

## HIGHLIGHTS

### Why OSIG Conducted This Audit

Virginia State Parks' mission is to preserve the Commonwealth's natural, scenic, historic, and cultural resources while offering recreational and educational opportunities that ensure responsible stewardship for future generations. This audit was conducted to assess whether state parks have the proper guidelines, tools, and processes to manage, track, and address maintenance and asset management effectively and consistently.

### What OSIG Recommends

- Establish a comprehensive process for tracking and reporting deferred maintenance, including the development of a prioritized list of maintenance needs with clearly defined priority categories.
- Work with Park Managers and District Managers to identify existing maintenance monitoring methods that have been effective in reducing resource downtime.
- Develop and implement standardized procedures for conducting formal facility inspections to assess park performance to include park maintenance.
- Develop guidelines for identifying when contractor services are needed for state park maintenance and for tracking reliance on the contractor services.



For more information, please contact OSIG at (804) 625-3255 or [www.osig.virginia.gov](http://www.osig.virginia.gov)

# TABLE OF CONTENTS

Report Acronyms .....	1
Background.....	2
Scope.....	4
Objectives .....	4
Methodology.....	4
Findings.....	5
Finding #1 - Deferred Maintenance Listing Requirements Needs Strengthening.....	5
Finding #2 - Routine, Preventative, and Repair Maintenance Activities are not Consistently Monitored.....	7
Finding #3 - DSP Lacks a Structured Process for Completing Inspections of State Parks .....	9
Finding #4 - Contracted Maintenance is Not Formally or Consistently Tracked at the Field Level .....	12
Finding #5 - Fixed Asset Tracking Processes at State Parks Need Improvement .....	14
Finding #6 - DCR Policies and Procedures Need Strengthening and Reinforcing to Best Govern Park Maintenance.....	16
Audit Results.....	19
Appendix I – DCR Response to OSIG’s Report.....	20
Appendix II – Corrective Action Plan .....	22

## REPORT ACRONYMS

The following is an alphabetical list of acronyms used in the report.

ATS – Asset Tracking System  
CAPP – Commonwealth Accounting Policies and Procedures  
DCR – Department of Conservation and Recreation  
DOA – Department of Accounts  
DSP – Division of State Parks  
EWP – Employee Work Profile  
FAACS – Fixed Asset Accounting and Control System  
PUP – Park User Perspective

### State Park Abbreviations

BC – Bear Creek Lake	NB – Natural Bridge
BI – Belle Isle	NT – Natural Tunnel
BK – Breaks Interstate	NR – New River Trail
CA – Caledon	OC – Occoneechee
CP – Chippokes	PO – Pocahontas
CL – Claytor Lake	PW – Powhatan
CR – Clinch River	SC – Sailor's Creek Battlefield Historic
CB – Culpeper Battlefields	SE – Seven Bends
DO – Douthat	SH – Shenandoah River
FS – Fairy Stone	ST – Shot Tower
FC – False Cape	SK – Sky Meadows
FL – First Landing	SM – Smith Mountain Lake
GH – Grayson Highlands	SW – Southwest Virginia Museum Historical
HB – High Bridge Trail	SR – Staunton River
HL – Holliday Lake	SB – Staunton River Battlefield
HM – Hungry Mother	SN – Sweet Run
JR – James River	TL – Twin Lakes
KP – Kiptopeke	WE – Westmoreland
LA – Lake Anna	WW – Widewater
LE – Leesylvania	WR – Wilderness Road
MA – Machicomoco	YR – York River
MN – Mason Neck	

## BACKGROUND

The Department of Conservation and Recreation's (DCR) nationally recognized state park system, which has received the National Gold Medal Award by the National Recreation and Park Association, provides a varied and robust assortment of natural, cultural, and recreational venues for the enjoyment, education, and use by Virginians and visitors. Parks have become a year-round, 24/7 operation and managing a park is very much like running a small town or city. There are educational programs, water and sewer systems, emergency and public safety operations, physical plant operations, community and public relations, marketing, and complex administrative functions (procurement, revenue management, recruitment and hiring, etc.) that require a broad skill set within a park staff that may only consist of 2-10 full-time employees.



Figure 1: Paddle boats at Hungry Mother State Park

The system encompasses over 40 active state parks covering over 75,000 acres. It contains additional land banked sites that have been acquired and are undergoing or awaiting development, including the provision of limited day-use public access opportunities. A series of bond-supported capital programs since 1992 have greatly expanded the number of parks and the number of campgrounds, cabins, visitor centers, conference facilities, swimming areas, trails, and other facilities within the system.

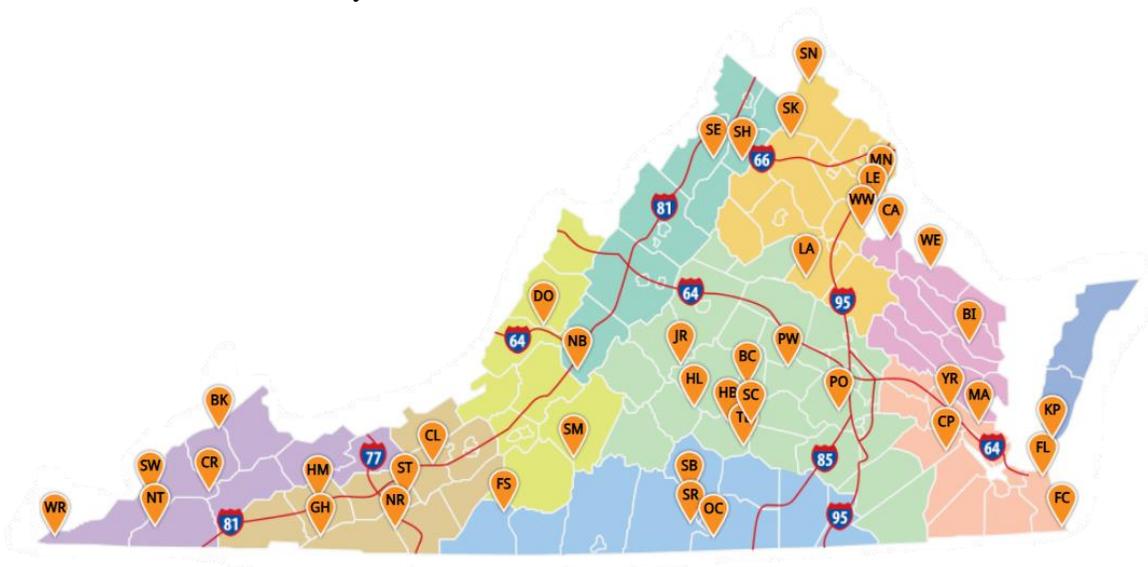


Figure 2: Map of parks across the Commonwealth featuring park locations from DCR's website

Each state park offers a variety of common amenities to visitors while also possessing unique character of its own. Some amenities can be found in almost every park, such as trails and educational programs, while other amenities are dependent on the park's individual characteristics and geography. Amenities can include overnight accommodations (campgrounds, cabins), waterway access (boat launches, watershed education), living history (reenactment, historic structures), and many others. Regardless of the type of amenities, each park requires robust maintenance practices to keep amenities clean, functional, and accessible.

In support of the State Park system, *Code of Virginia* § 10.1-200 states that DCR “shall establish and implement a long-range plan for acquisition, maintenance, improvement, protection and conservation for public use of those areas of the Commonwealth best adapted to the development of a comprehensive system of outdoor recreational facilities in all fields, including, but not limited to: parks, forests, camping grounds, fishing and hunting grounds, scenic areas, waters and highways, boat landings, beaches and other areas of public access to navigable waters.” These responsibilities include a wide range of routine, preventative, and repair maintenance activities such as maintaining camping and lodging facilities, recreational trails and access points, and a vast array of machines and tools used by park staff.

Managing the maintenance needs of park resources is a broad, complicated task that requires a great deal of planning and monitoring. Due to the complexity and cost of maintenance, DSP maintains a list of statewide and individual park maintenance needs that have been deferred. These amounts are estimated on an annual basis. Maintenance needs are different at each park, as each park has different resources and amenities.

## SCOPE

The audit focused on DCR's management and operational processes related to state park maintenance and activities, covering the period from July 1, 2022, to September 30, 2024.

## OBJECTIVES

Objectives of this audit were to:

1. Determine whether state parks are provided with guidelines and tools to ensure that park maintenance is consistently and effectively managed.
2. Determine if state parks timely and properly address routine, preventative, repair, and deferred maintenance items.
3. Determine whether state parks have processes in place to properly manage and track their assets.

## METHODOLOGY

OSIG conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that OSIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. OSIG believes that the evidence obtained provides reasonable basis for the findings and conclusion based on the audit objectives.

OSIG applied various methodologies during the audit process to gather and analyze information pertinent to the audit scope and to assist with developing and testing the audit objectives. The methodologies included the following:

- Conducted interviews with DCR management and park personnel (park managers, park staff, and district managers) to gain an understanding of the areas that were audited.
- Conducted a survey of DCR park management and park personnel to gain an understanding of the areas that were audited and identify opportunities for improvement.
- Conducted on-site walkthroughs at a judgmental sample of seven parks, ensuring coverage from all six districts and a variety of amenity types offered, to gain an understanding of the audit area, assessing the processes for efficiency and effectiveness.
- Reviewed and assessed policies and procedures that govern DCR's processes.
- Collected and analyzed maintenance logs and process documentation from the seven sampled parks to identify areas where improvements may be needed.
- Collected and analyzed park data and related documents for the seven sampled parks including policies and procedures, maintenance tracking logs, deferred maintenance lists, and park assets tracking lists.
- Selected a haphazard sample of park assets from the asset listing to evaluate the effectiveness of asset management tracking by verifying their location and condition.
- Analyzed maintenance practices across different parks to identify best practices and areas for standardization.

## FINDINGS

### FINDING #1 - DEFERRED MAINTENANCE LISTING REQUIREMENTS NEEDS STRENGTHENING

DCR and DSP leadership have not provided clarity across the agency regarding purpose, goals, objectives or processes related to the management of the deferred maintenance program. Additionally, there has been no consistent guidance on how to quantify or prioritize deferred maintenance needs, which has resulted in discrepancies between deferred maintenance backlog estimates in the field and in the central office.

DCR provided an estimate of deferred maintenance needs as of January 2024, which identified \$364 million of backlog maintenance items, however, DCR's report to the general assembly in November 2021 (RD774) estimated a deferred maintenance backlog of \$276 million. DCR stated that this growth is due to inflation and the lack of consistent, dedicated, and meaningful funding to address the backlog of deferred maintenance needs. DCR also attributes the growth to increasing park needs and changes in the scope of work for existing projects. Variations in how district managers and park managers interpret the listings, and uncertainty about which projects to prioritize prevents maximization of limited resources to address deferred maintenance needs. Additionally, the subjectivity of the deferred maintenance listings reduces the reliability of statewide data, which is crucial for effective resource allocation and long-term planning.

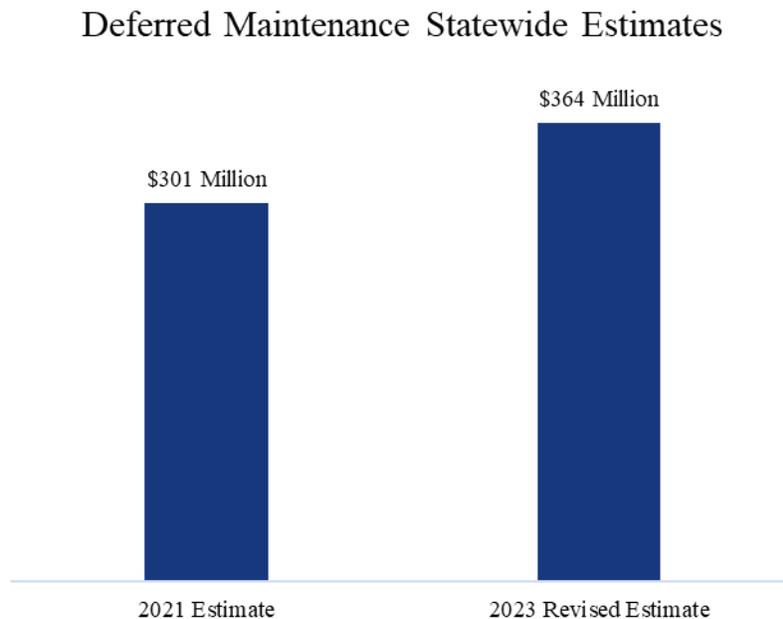


Figure 3: Deferred Maintenance Estimates per DCR

In addition, the reason for listing a project on the deferred maintenance lists is not easily identified, nor is the criticality of the project and potential impact on park operations. This inconsistency causes variation in project types and durations on the list, with items on one list tested lasting over 10 years due to resource constraints. Due to the age of the items, the lists often include items from before the current park manager's tenure. Because of insufficient knowledge transfer or guidance from DSP leadership, park managers are left to interpret these lists independently, resulting in inconsistent use of the list as a planning tool by the Division.



*Figure 4: Deteriorated handrailing on boardwalk.*

### **Recommendations:**

1. DCR should establish a comprehensive process for tracking and reporting deferred maintenance, including the development of a prioritized list of maintenance needs with clearly defined priority categories. This process should be supported by a periodic review to regularly assess and update maintenance needs.
2. DCR should implement a management-level review process to evaluate and maximize the allocation of budget resources for addressing deferred maintenance, and to clearly define the need for additional resources if warranted.
3. Once established, DCR should work with DSP to outline the short- and long-term objectives for deferred maintenance listings. After these objectives are defined, DSP leadership should implement the necessary processes to support them and ensure clear communication with each district and parks regarding how the deferred maintenance listings should be created, and which types of maintenance projects should be included.

### ***DCR Management Response(s):***

Management agreed with the conditions observed by OSIG and agreed with the recommendations.

## FINDING #2 - ROUTINE, PREVENTATIVE, AND REPAIR MAINTENANCE ACTIVITIES ARE NOT CONSISTENTLY MONITORED

DSP leadership has not developed standardized processes for monitoring and documenting routine, preventative, and repair maintenance activities across state parks, leading to inconsistent practices. OSIG conducted walkthroughs at seven parks and found the following:

- Four of seven parks (57%) had no process for monitoring maintenance activities or had paper logs to document certain maintenance tasks, but the paper logs were not being consistently utilized.
- Three of the seven parks (43%) had developed maintenance monitoring processes using a publicly available application software. These parks demonstrated a better understanding of both current and historical maintenance needs, and appeared less impacted by employee turnover, as new staff could be more easily integrated into the existing process.
- Due to insufficient documentation and limited reporting features of the application, OSIG was unable to test the timeliness of maintenance activities at any of the seven parks.

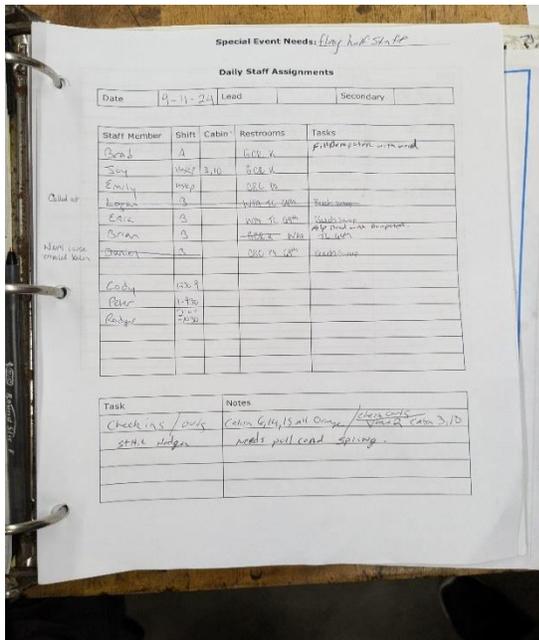


Figure 5: Paper based monitoring system

Effective maintenance management is essential to park operations, as outlined in Title 4 of the Administrative Code (4VAC5). Although DCR and DSP have provided guidelines for specific resources, such as the Campground Management Manual, Cabin Management Manual, and Trail Development and Management Manual, these documents do not include comprehensive procedures for monitoring and documenting overall maintenance practices.

The absence of standardized procedures for monitoring and documenting maintenance has resulted in different approaches across parks, such as verbal instructions, paper checklists, daily logs, and use of application software. These practices are inconsistent and may cause maintenance issues to be overlooked or delayed, negatively impacting the

visitor experience. This inconsistency is further supported by a staff survey, which found many parks rely on informal, verbal communication for maintenance due to a lack of clear expectations or guidance from DSP.

DCR has a contract in place and is developing a comprehensive asset management and maintenance monitoring system. Putting standardized monitoring processes and procedures in

place for tracking maintenance tasks will assist with developing and implementing the requirements for the new system.

**Recommendations:**

1. DSP leadership should work with Park Managers and District Managers to identify existing maintenance monitoring methods that have been effective in reducing resource downtime and enhancing the visitor experience.
2. DSP leadership should use this information to develop policies and procedures that will help parks improve the monitoring of maintenance activities. This should include requirements for documenting and tracking maintenance activities to ensure they are completed timely.
3. DSP leadership should incorporate these requirements into the new asset management and maintenance monitoring system to strengthen the functionality of the new system for state parks employees.

***DCR Management Response(s):***

Management agreed with the conditions observed by OSIG and agreed with the recommendations.

### FINDING #3 - DSP LACKS A STRUCTURED PROCESS FOR COMPLETING INSPECTIONS OF STATE PARKS

DSP lacks a structured oversight framework for state park maintenance, which weakens the ability for DCR and DSP to ensure state parks are properly maintained. DSP Central Office identified the Park User Perspective (PUP) form and annual building inspections as formal tools district managers use to assess park performance and verify that maintenance tasks are being



*Figure 6: Yurt needing maintenance*

completed. These tools support the broader goal of enhancing the management and sustainability of state parks. Planning interviews with DSP leadership did not provide clear information about how often PUP inspections should be conducted, and there was an overall lack of details regarding the practical use and implementation of these tools for park oversight.

OSIG requested prior PUP and annual inspections from seven state parks, noting six of the seven parks (86%) had not undergone a PUP inspection since July 1, 2022, and all seven parks (100%) lacked documentation of annual building inspections. A review of the provided PUP inspection found the form to be incomplete, as it omitted eight of the nine (89%) review sections, which severely limited its

effectiveness to comprehensively assess park performance. Compounding the issue, the inspections lacked follow-up steps to address identified concerns.

OSIG also reviewed a PUP inspection conducted in 2019 for one of the seven state parks sampled. Although it fell outside the audit period, this inspection was also incomplete. However, it did not utilize the official PUP form. As a result, it was not possible to calculate the exact percentage of missing sections, though it appeared to cover two of the nine sections (22%) of the inspection form. Similarly, this inspection also lacked follow-up steps to address identified concerns.

Overall, a review of all provided inspections showed that five of seven parks (71%) have not received a formal PUP evaluation since 2019. During interviews, the five park managers could not recall the last time their park received a PUP inspection or understood the criteria necessary to meet or exceed expectations based on the form's rating scale. Similarly, while all parks reported conducting regular facility and grounds inspections, these inspections were informal and undocumented. In the absence of district feedback, park managers relied on their own personal judgement and informal site inspections to assess park performance, focusing on similar criteria as the PUP form.

DCR is responsible for ensuring accountability and structured feedback mechanisms are in place to safeguard the proper maintenance of state parks. Without such oversight, park staff are left to rely on informal feedback, which can lead to inefficiencies in evaluating park performance. Relying solely on informal feedback for evaluating park performance and addressing identified problems can lead to several issues including:

- Inconsistent standards across parks, as individual perceptions of acceptable performance may differ.
- Issues being unintentionally overlooked, delaying problem resolution.
- A lack of reliable records hindering analysis of progress.



*Figure 7: Defunct pool identified from a third-party inspection; repairs not planned due to high restoration costs*

**Recommendations:**

1. Develop and implement standardized procedures for conducting formal facility inspections to assess park performance to include park maintenance.
2. Establish requirements for how often inspections should be conducted and include review requirements to ensure that inspections are fully completed, and issues are properly communicated to state park management to address.

***DCR Management Response(s):***

Management agreed with the conditions observed by OSIG and agreed with the recommendations.

## **FINDING #4 - CONTRACTED MAINTENANCE IS NOT FORMALLY OR CONSISTENTLY TRACKED AT THE FIELD LEVEL**

State parks rely heavily on contractors for maintenance services but use informal, undocumented processes to determine when a contractor is needed. Contractors are utilized when specialized certification is needed and/or when park staff do not have the time or expertise to perform the maintenance. OSIG conducted walkthroughs at seven parks and found none of them had a formalized, consistent method for determining when a contractor is needed or for tracking overall costs of contractor services. These walkthroughs also revealed that, at each of the seven parks, staff could only provide rough estimates of specialized service provider usage. For example, one park estimated that 75% of repairs are completed by contractors due to position vacancies and certification requirements.

When inquiring as to the reason for the heavy reliance on specialized service providers, park staff cited a lack of required certifications, specialized skills, or sufficient staff availability as the main reasons. Although these services are costly, parks lack the resources and expertise to manage maintenance without outside assistance. This dependency is further confirmed by the staff survey where 35% of respondents reported relying on contractors for nearly all maintenance tasks, and 27% for about half of their maintenance projects. Additionally, existing maintenance monitoring processes did not include sufficient data to quantify the impact of maintenance projects, including those that required specialized service providers.

The Virginia Public Procurement Act authorizes directors to enter into contracts necessary or incidental to the performance of its duties (§ 2.2-601) and that departments may consider best value when procuring services (§ 2.2-4300). DCR contracts with specialized service providers that offer expertise and skills that staff may not possess or when projects may be too resource-intensive for parks to maintain in-house. Without formal, consistent methods for parks to determine when a contract is needed and to measure the cost impact, the agency may be missing opportunities to leverage term contracts for similar services in geographically connected areas.

### **Recommendations:**

1. DSP leadership should develop guidelines for identifying when contractor services are needed for state park maintenance and for tracking reliance on the contractor services. These guidelines should then be shared with field park staff to use in the decision-making process.
2. Parks should document and track their use of contractors and timeliness of services in a manner that enables DCR to aggregate the information and use it to inform cost offsetting decisions.
3. DCR leadership should consider conducting an analysis of the cost of reliance on contracted providers and consider cost offsetting options such as pursuing state

contracts for common services or creating a position focused on addressing such services, within the constraints of allowance by regulatory agencies.

***DCR Management Response:***

Management agreed with the conditions observed by OSIG and agreed with the recommendations.

## FINDING #5 - FIXED ASSET TRACKING PROCESSES AT STATE PARKS NEED IMPROVEMENT

OSIG identified instances in which DCR’s data related to their assets were not accurate or complete in the DCR Agency Tracking System (ATS). Parks have relied on the DCR Fixed Asset Accounting and Control System (FAACS) for asset inventory and management, but this system is not built to capture maintenance information or asset condition, resulting in data gaps and inconsistencies. DOA lays out physical inventory guidelines in CAPP Topic Number 30505. CAPP Topic Number 30505 states that agencies, “should develop internal procedures to ensure that all assets are periodically reviewed and inventoried every two years as required.” In accordance with the CAPP, “The objectives of a physical inventory are to ensure that the capital assets recorded in the [FAACS] physically exist, determine if unrecorded or improperly recorded transactions have occurred, and identify any excess, defective or obsolete assets on hand.”

OSIG obtained a list of fixed assets from Central Office, for all state parks. OSIG sampled seven state parks and selected ten items from each of the sampled parks to include in testwork. Assets at parks identified as current were determined to be one of the following:

- Could not be found (one out of the seventy assets tested).
- Surplused (two out of the seventy assets tested).
- In a state of disrepair (three out of the seventy assets tested).



Figure 8: Club Car in a state of disrepair

In addition to the testwork above, OSIG conducted further testwork of capital assets at the seven state parks. This testwork included OSIG haphazardly selecting 10 capital assets at each state park to agree the items back to the Central Office fixed asset list. Of the seventy assets tested, the exception of the asset not being listed in ATS occurred seven times.

DCR and DSP leadership have not consistently enforced agency specific standards or guidelines for how parks should manage and maintain assets. This lack of enforcement has led to inconsistent asset management practices across parks, contributing to the absence of accurate and complete asset data. DCR is in the early stages of implementing a new asset management and maintenance system. The intent of this system will be to provide the agency with a comprehensive inventory of assets and capture key details such as maintenance activities and asset condition. This new system aims to address current asset tracking issues and support effective maintenance management. Addressing these issues beforehand will ensure the system

reflects the true state of agency assets and supports timely, informed maintenance decisions, leading to a smoother implementation process.

**Recommendations:**

1. DSP leadership should establish standardized asset management policies and procedures for parks to ensure accurate asset data, particularly regarding maintenance activities and asset condition, is captured before transitioning to the new asset management system.
2. DSP should ensure that asset lists are complete with asset condition and maintenance requirements updated for keying into the new asset management and maintenance system when implemented by the agency.

***DCR Management Response(s):***

Management agreed with the conditions observed by OSIG and agreed with the recommendations.

## **FINDING #6 - DCR POLICIES AND PROCEDURES NEED STRENGTHENING AND REINFORCING TO BEST GOVERN PARK MAINTENANCE**

OSIG identified multiple areas that are operated/managed by DSP that do not have documented and/or updated policies that govern the maintenance of parks and amenities managed by DSP. Effective maintenance management is a key component of park operations and falls under DCR's responsibilities in managing state parks, as outlined in Title 4 of the Administrative Code (4VAC5). The following areas of park operations are overseen and managed by DCR:

- Amenity maintenance, including:
  - Routine maintenance.
  - Preventative maintenance.
  - Repair maintenance.
  - Deferred maintenance.
- Custodial Maintenance.
- Landscaping and Groundskeeping.
- Waste Management and Litter Control.
- Equipment and Infrastructure Upkeep.
- Use of Contracted Services.
- Asset Management.

OSIG found that documented division-level policies do not exist to guide the daily operations conducted by DSP staff for the areas mentioned above. While some division-level standards and procedures are incorporated in the Trail Development and Management Manual, Campground Management Manual, and Cabin Management Manual ("Management Manuals"), DSP leadership stated that these manuals represent best practices and are not formalized policy. In the absence of division-level policies, procedures, and standards, parks are responsible for developing and implementing their own policies, procedures, and standards for park maintenance in areas not covered by the management manuals. The Management Manuals are adequate for maintaining specific amenities (e.g. trails, cabins, and campgrounds); however, addressing park maintenance beyond these amenities requires additional policies, procedures, and standards to establish a more comprehensive maintenance framework.

A review of seven parks' policies and procedures provided to OSIG revealed that park-developed policies, procedures and standards were lacking in availability and comprehensiveness.

OSIG found:

- Seven out of seven (100%) parks did not have policies or procedures relating to trail maintenance.
- Four out of six (67%) parks with lodging did not have policies or procedures relating to lodging facilities maintenance.
- Five out of six (83%) parks with campgrounds did not have policies or procedures for campground maintenance.

Further, guidance that was available lacked specific, identifiable policies, procedures, or standards for the maintenance of the park and its amenities. As a result, it required staff to have significant familiarity with maintenance operations and processes for the guidance to be used effectively.

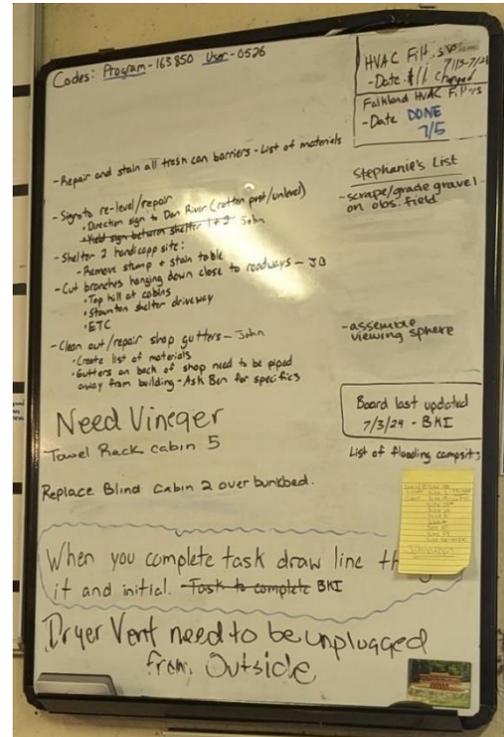


Figure 9: Maintenance whiteboard

Discussions with DSP personnel revealed several reasons for the absence of division-wide policies. This included the absence of formal expectations or requirements for policy development, and challenges in adopting a one-size-fits-all approach to park maintenance guidance due to the unique nature of each state park. Additionally, there was a perception that relying on institutional knowledge and on-the-job training was sufficient to maintain operations.

When a park operates without clear policies, procedures, or standards; or when those standards are out of date, management is unable to assess maintenance operations for consistency or identify necessary updates. Documenting all key maintenance areas and processes in a central, accessible location ensures everyone stays informed and aligned in their responsibilities, while also enabling continuity when there is turnover.

### Recommendations:

1. DSP Leadership should develop, or update, and implement formal policies and procedures for the administration of park maintenance activities that include establishing procedures for park maintenance that includes appropriate standards and monitoring protocol, incorporating relevant sections from the working group management manuals where beneficial. This should include, but is not limited to, the following areas:
  - Routine Maintenance activities.
  - Preventative Maintenance activities.

- Repair Maintenance activities.
  - Deferred Maintenance activities.
  - Custodial Maintenance activities.
  - Landscaping and Groundskeeping.
  - Waste Management and Litter Control.
  - Equipment and Infrastructure Upkeep.
  - Use of Contracted Services.
  - Asset Management.
2. Once policies are developed, state parks should be provided guidance on how to craft individualized implementation plans that address the uniqueness of each property while ensuring a statewide standard is maintained.

***DCR Management Response(s):***

Management agreed with the conditions observed by OSIG and agreed with the recommendations.

## AUDIT RESULTS

This report presents the results of OSIG's audit of State Park Maintenance. OSIG performed the following audit testing with immaterial, if any, discrepancies noted:

- Evaluated internal communications between DCR, DSP, and field operations.
- Evaluated gaps in tools, resources, and standardized processes for effective park management.
- Reviewed EWPs of respective maintenance personnel for consistency.

Based on the results and findings of the audit test work conducted of State Park Maintenance, OSIG concluded that internal controls were operating properly, except as identified in the report findings.

# APPENDIX I - DCR RESPONSE TO OSIG'S REPORT

Stefanie K. Taillon  
*Acting Secretary of Natural and Historic Resources*

Matthew S. Wells  
*Director*

Andrew W. Smith  
*Chief Deputy Director*



**COMMONWEALTH of VIRGINIA**  
DEPARTMENT OF CONSERVATION AND RECREATION

Frank N. Stovall  
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Dam Safety,  
Floodplain Management and  
Soil and Water Conservation*

Laura Ellis  
*Deputy Director for  
Administration and Finance*

March 20, 2025

Mr. Michael C. Westfall  
Office of the State Inspector General  
P.O. Box 1151  
Richmond, VA 23218

Inspector General Westfall,

I wish to thank your staff for their recent work in reviewing Virginia State Parks Maintenance practices. As your report notes, "Managing the maintenance needs of park resources is a broad, complicated task that requires a great deal of planning and monitoring." The day-to-day operations of our State Parks are driven by our dedicated Park Rangers, who work tirelessly to provide an amazing experience for our park guests, and to carefully steward the resources that are placed under their care. Park-level staff are overseen by District and Regional managers, all of whom are supported by Division leadership.

Given the distributed nature of the State Parks system, operational and maintenance decision-making at the field level has historically relied on the experience, insight, and professional judgment of our Park Rangers and District Managers. There is no substitute for this expertise, and because of the quality of our Park Rangers, the system has provided award-winning experiences for our guests. However, as the report points out in its findings, there is a need for robust documented procedures, structured processes, and clear communication from Richmond if the Division and the Department are to maximize resources and ensure continuity of operations, particularly as long-serving Rangers retire, and a new generation takes their place.

As we look towards the 100<sup>th</sup> anniversary of the State Parks system in 2036, we acknowledge that there is room for improvement to ensure that Virginians can continue to enjoy a best-in-class system. In response to this, for the past three years, the Division and the Department have been engaged in efforts to improve communication, standardize processes, refine planning processes, and develop better – and more usable – data for decision-making. These efforts include significant changes to the Park Master Planning process, the development and ongoing implementation of new GIS-based tracking of natural resources, the ongoing implementation of a new tracking system for physical assets, and the development of online dashboards and mapping systems to make this information available to both leadership and field staff.

Similarly, we have made changes to our capital and deferred maintenance review and decision-making process to make it more transparent for agency leadership, and have taken the first steps towards better communicating this process to field staff. We believe that the current deferred maintenance list is accurate inasmuch as it captures real needs, and the costs included on it are reasonable estimates;

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however, the process for including items on the list and prioritizing those items has historically been a subjective process. While capital planning will always be impacted by the appropriation and legislative processes (for example, funding for maintenance and capital is frequently designated by the legislature for specific projects), we are working towards a more robust internal system for elevating and evaluating capital projects to better inform our decision-making and budgetary recommendations.

I am pleased to see that many of OSIG's recommendations support the efforts we have undertaken to date, while at the same time identifying areas that require additional focus. Further, I look forward to continuing and accelerating the work of the past three years as we implement the Corrective Action Plan included in the report. Finally, I hope that you and your team will continue to enjoy our wonderful Virginia State Parks.

Sincerely,



Matthew S. Wells  
DCR Director

## APPENDIX II - CORRECTIVE ACTION PLAN

FINDING NO.	RECOMMENDATIONS	CORRECTIVE ACTION	DELIVERABLE	ESTIMATED COMPLETION DATE	RESPONSIBLE POSITION
1 - Deferred Maintenance Listing Requirements Needs Strengthening	<ol style="list-style-type: none"> <li>1. DCR should establish a comprehensive process for tracking and reporting deferred maintenance, including the development of a prioritized list of maintenance needs with clearly defined priority categories. This process should be supported by a periodic review to regularly assess and update maintenance needs.</li> <li>2. DCR should implement a management-level review process to evaluate and maximize the allocation of budget resources for addressing deferred maintenance, and to clearly define the need for additional resources if warranted.</li> <li>3. Once established, DCR should work with DSP to</li> </ol>	<p>DCR is currently implementing a comprehensive park maintenance application that will allow the DSP to evaluate, prioritize, monitor, track, report, and budget for maintenance projects at all levels of maintenance and across all state parks.</p> <p>DCR will develop a formalized management level review process involving the DSP and the Division of Planning and Recreation Resources, as well as senior agency leadership, to ensure that the limited maintenance funding provided to the agency is allocated for maximum efficiency and effect.</p>	<p>Implemented DCR Maintenance Application and Technology Solution</p> <p>Process and policy for maintenance funding application.</p> <p>Deferred maintenance management policy and associated training program.</p>	<p>June 30, 2027</p> <p>The software application to address this corrective action is currently being implemented across the system, but the implementation will occur in phases to ensure maximum effectiveness and uniform application of the system. The first phase is currently underway with the last phase being completed no later than June 30, 2027.</p>	Deputy Director for Operations

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	<p>outline the short- and long-term objectives for deferred maintenance listings. After these objectives are defined, DSP leadership should implement the necessary processes to support them and ensure clear communication with the district and parks regarding how the deferred maintenance listings should be created, and which types of maintenance projects should be included.</p>	<p>DCR will develop a comprehensive approach and objectives for deferred maintenance tracking, including management objectives, listing criteria and a methodology for prioritizing listed items. Training, reinforced by regular communication, will be provided to support this effort to ensure proper application.</p>			
<p>2 - Routine, Preventative, and Repair Maintenance Activities are Not Consistently Monitored</p>	<p>1. DSP leadership should work with Park Managers and District Managers to identify existing maintenance monitoring methods that have been effective in reducing resource downtime and enhancing the visitor experience.</p>	<p>DCR is currently implementing a comprehensive park maintenance application that will allow the DSP to evaluate, prioritize, monitor, track, report, and budget for maintenance projects at all levels of</p>	<p>Implemented DCR Maintenance Application and Technology Solution</p>	<p>June 30, 2027  The software application to address this corrective action is currently being implemented across the system, but the</p>	<p>Deputy Director for Operations</p>

FINDING NO.	RECOMMENDATIONS	CORRECTIVE ACTION	DELIVERABLE	ESTIMATED COMPLETION DATE	RESPONSIBLE POSITION
	<p>2. DSP leadership should use this information to develop policies and procedures that will help parks improve the monitoring of maintenance activities. This should include requirements for documenting and tracking maintenance activities to ensure they are completed timely.</p> <p>3. After development, DSP leadership should incorporate these requirements into the new asset management and maintenance monitoring system to strengthen the functionality of the new system for state parks employees.</p>	<p>maintenance and across all state parks. This system will address the documentation and tracking recommendations to address this finding.</p> <p>DCR will work with DSP leadership and field personnel, including park managers and district managers, to identify best management practices for maintenance operations and management and incorporate those practices into standard operating procedures as part of the deliverables and corrective actions associated with finding number six.</p>		<p>implementation will occur in phases to ensure maximum effectiveness and uniform application of the system. The first phase is currently underway with the last phase being completed no later than June 30, 2027.</p>	
<p>3 - DSP Lacks a Structured Process for Completing Inspections of State</p>	<p>1. Develop and implement standardized procedures for conducting formal facility inspections to</p>	<p>Currently, District Managers and DSP leadership inspect parks in</p>	<p>New DSP Inspections of State Parks Procedures</p>	<p>December 31, 2025</p>	<p>Deputy Director for Operations</p>

FINDING NO.	RECOMMENDATIONS	CORRECTIVE ACTION	DELIVERABLE	ESTIMATED COMPLETION DATE	RESPONSIBLE POSITION
Parks	<p>assess park performance to include park maintenance.</p> <p>2. Establish requirements for how often inspections should be conducted and include review requirements to ensure that inspections are fully completed, and issues are properly communicated to state park management to address.</p>	<p>an unstructured, often informal manner as they travel throughout the system. In place of this, DCR will develop and implement standardized procedures for conducting formal facility inspections to assess park performance to include park maintenance. Procedures will include how often and what requirements are needed to complete the inspections. Once developed, the agency will monitor for compliance.</p>			
4 - Contracted Maintenance is Not Formally or Consistently Tracked at the Field Level	<p>1. DSP leadership should develop guidelines for identifying when contractor services are needed for state park maintenance and for tracking reliance on the contractor services. These</p>	<p>DCR will develop a set of guidelines for identifying when contractor services are needed for state park maintenance and will track the use of contractor services in state park</p>	<p>Contracting management, selection, and tracking guidelines.</p>	<p>June 30, 2026</p>	<p>Deputy Director for Operations</p>

FINDING NO.	RECOMMENDATIONS	CORRECTIVE ACTION	DELIVERABLE	ESTIMATED COMPLETION DATE	RESPONSIBLE POSITION
	<p>guidelines should then be shared with field park staff to use in the decision-making process.</p> <p>2. Parks should document and track their use of contractors and timeliness of services in a manner that enables DCR to aggregate the information and use it to inform cost offsetting decisions.</p> <p>3. DCR leadership should consider conducting an analysis of the cost of reliance on contracted providers and consider cost offsetting options such as pursuing state contracts for common services or creating a position focused on addressing such services, within the constraints of allowance by regulatory agencies.</p>	<p>maintenance. Once developed, the guidelines will be shared with field staff for use in evaluating maintenance management.</p> <p>DCR has previously conducted a high-level analysis of the cost of contractors versus the creation of one or more “Trade Tech” positions. That analysis revealed that bringing this work in-house could improve quality, reduce contract costs, reduce the need to manage and supervise contracts, and decentralize much of the work, creating efficiencies in operations. However, this concept has not moved forward in the budgetary process. DCR will renew this effort and</p>			

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		<p>will utilize data gathered from tracking contractor maintenance use to inform future cost offsetting decisions and will further utilize the data to inform decision making related to the development of state contracts for certain services or developing internal ability to address key maintenance needs, recognizing that there are current constraints to this approach that are implemented by other agencies which have some level of regulatory authority over DCR's actions and decisions.</p> <p>DCR further notes that the implementation of the maintenance and asset management software</p>			

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		system that was procured in 2024 will aid in the management and tracking of contract maintenance work.			
5 - Fixed Asset Tracking Processes at State Parks Need Improvement	<ol style="list-style-type: none"> <li>1. DSP leadership should establish standardized asset management policies and procedures for parks to ensure accurate asset data, particularly regarding maintenance activities and asset condition, is captured before transitioning to the new asset management system.</li> <li>2. DSP should ensure that asset lists are complete with asset condition and maintenance requirements updated for keying into the new asset management and maintenance system when implemented by the agency.</li> </ol>	DCR will review and update its asset management policy to ensure it meets applicable state standards, and DCR will develop processes for tracking maintenance and facility condition in conjunction with the implementation of the asset management system. DCR will continue to periodically audit fixed assets on state parks and require corrective actions for any deficiencies found.	Updated DCR Fixed Asset Policy	December 31, 2025	Deputy Director for Operations

<b>FINDING NO.</b>	<b>RECOMMENDATIONS</b>	<b>CORRECTIVE ACTION</b>	<b>DELIVERABLE</b>	<b>ESTIMATED COMPLETION DATE</b>	<b>RESPONSIBLE POSITION</b>
<p>6 - DCR Policies and Procedures Need Strengthening and Reinforcing to Best Govern Park Maintenance</p>	<p>1. DSP Leadership should develop, or update, and implement formal policies and procedures for the administration of park maintenance activities that include establishing procedures for park maintenance that includes appropriate standards and monitoring protocol, incorporating relevant sections from the working group management manuals, where beneficial. This should include but is not limited to the following areas:</p> <ul style="list-style-type: none"> <li>○ Routine Maintenance activities.</li> <li>○ Preventative Maintenance activities.</li> <li>○ Repair Maintenance activities.</li> </ul>	<p>DSP will develop, update, and implement formal policies for the administration of park maintenance activities as directed by this OSIG report.</p>	<p>New or updated DSP maintenance policies</p>	<p>June 30, 2026</p> <p>DCR will review and update existing policy for more immediate implementation and implement additional recommended policies and procedures over the period between the date of this report and June 30, 2026.</p>	<p>Deputy Director for Operations</p>

FINDING NO.	RECOMMENDATIONS	CORRECTIVE ACTION	DELIVERABLE	ESTIMATED COMPLETION DATE	RESPONSIBLE POSITION
	<ul style="list-style-type: none"> <li>○ Deferred Maintenance activities.</li> <li>○ Custodial Maintenance activities.</li> <li>○ Landscaping and Groundskeeping.</li> <li>○ Waste Management and Litter Control.</li> <li>○ Equipment and Infrastructure Upkeep.</li> <li>○ Use of Contracted Services.</li> <li>○ Asset Management.</li> </ul> <p>Once policies are developed, state parks should be provided guidance on how to craft individualized implementation plans that address the uniqueness of each property while ensuring a statewide standard is maintained.</p>				