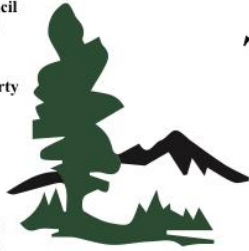


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The Coalition To Protect America's National Parks

Voices of Experience

**Statement of Denis P. Galvin
Coalition to Protect America's National Parks
Subcommittee on Oversight and Investigations, Committee on Natural Resources
United States House of Representatives
"Transforming the Department of the Interior for the 21st Century"**

December 7, 2017

Mr. Chairman and members of the subcommittee, thank you for the opportunity to appear before you today to discuss proposals to reorganize the Department of the Interior for the 21st Century. I am a long-time member and advisor to the Coalition to Protect America's National Parks, having retired in 2002 after a 40-year career with the National Park Service (NPS). The Coalition is comprised of more than 1,400 members who collectively have more than 35,000 years of experience managing and protecting national parks. We believe that our parks and public lands represent the very best of America, and advocate for their protection.

Many administrations come into office with a stated goal to transform the federal government to make it more efficient and more responsive to the American public. While admirable, this goal is not new as it has been repeated frequently over the past several decades. All Americans want to know that our federal dollars are being spent wisely and we all want the federal government to be responsive to the needs of the American people.

However, the effort to transform the Department of the Interior that we have heard about is quite different from previous efforts due to its lack of transparency and secrecy. We understand the reorganization plan is one of the three top priorities Secretary Zinke mentions often. We have heard a plan for the department's reorganization was sent to the Office of Management and Budget in September; however, nothing has been released to the public that outlines the goals of the reorganization, the cost to the department, or its effect on the department and the various bureaus within. The leadership of the bureaus has been left primarily in the dark and there has been no opportunity for public input or comment.

We have been able to piece together certain aspects of the plan based on things we have heard the secretary and other political appointees in the department have mentioned to selected individuals. And we have been told that many in Congress are also in the dark on this plan. The process is mystifying, to say the least.

We understand the secretary's vision is to reorganize the department into approximately 13 regions throughout the country based upon watersheds, with all bureaus in the department relocating its staff to a smaller city within the designated region. This contrasts with many bureaus' regional offices now being located in major metropolitan areas. We also have heard that

a senior executive from one of the bureaus would be appointed as the regional director on a rotating basis. The plan includes a dramatic reduction in staff in the Washington and regional offices by moving people to the parks and other public lands. And most importantly, we have heard the secretary has said this reorganization would cost an estimated \$1 billion with the reorganization being completed in 2019.

By adopting this model, we understand the intent of the plan is for the bureaus to be located closer to the people affected by the bureaus' decisions and policies. We have also heard that the intent is to give local superintendents, refuge managers, and public lands' officials more authority.

While some of the details of the plan may be off the mark due to the lack of transparency, we know that any reorganization must be planned well because of the disruption and the cost involved in moving many people. With this current effort, we wonder what the purpose of the reorganization is and what its goals are. We also want to know what analysis went into developing this reorganizational plan. We understand the Park Service was not consulted to determine the effects the reorganization would have on the national parks. This leads us to ask who developed the plan and their experience with national parks and the issues affecting the agency.

We also question how the differing statutory mandates of the various bureaus in the department would be reconciled with the bureaus having widely divergent missions. And without disparaging the credentials of any individual, we wonder how a senior executive from the Bureau of Ocean Energy Management, as an example, can be expected to make a decision about a conflict involving cultural resources in a national park.

Reorganizing government is not new to the National Park Service or to me. In 1995, when the Clinton Administration took office, there was a similar reorganization of the National Park Service under the administration's Reinventing Government Initiative. The National Park Service was required to reduce central office staffing by 1,300 positions, which resulted in the consolidation of 10 regions into 7 regions. At that time, the NPS put together a team that worked several months to develop a plan that would meet the goals of both the reorganization initiative and that was in the best interest of the agency. Additionally, then-Secretary Babbitt created a new agency, the National Biological Survey (later Service) where staff from seven bureaus within the Department formed a central, independent, biological science organization that was intended to handle the needs of all national parks and other public lands. Both of these efforts were intended to reduce central office staffing and to move people to the parks where they could better serve the public.

In the late 1990s, because of a controversy about construction at Delaware Water Gap National Recreation Area, the National Park Service was required by Congress to reorganize the Denver Service Center. This effort resulted in comprehensive planning where we knew the goals involved and the number of people that would either be moved to other positions or places, as well as those who would need to be let go. While not easy, we were able to accomplish Congress' objectives while doing so in a manner that was in the best interest of the National Park Service as a whole.

During another reorganizational effort in the last two years of the George W. Bush administration, the NPS was forced to compete with the private sector for our hiring and staffing functions as the administration believed the private sector could perform these functions more cost-effectively. The National Park Service developed a plan to consolidate these functions into a central office in

Omaha, Nebraska, office, with supporting regional office staff throughout the country. This plan was developed after careful consideration of various models and discussion with individuals and programs affected. And in the end, these functions were retained within NPS instead of being outsourced; however, the Omaha central office portion of the plan was never implemented.

These reorganizational efforts were not without controversy and were not wholly successful despite the planning that occurred. In the 1995 initiative, staffing at the regional offices was reduced by half and we believe the effects of this reorganization are still being felt to this day. Despite what some may believe, reducing staffing in Washington and regional offices is not a panacea. People working in the Washington and regional offices provide a wide range of oversight, carried out by knowledgeable people with expertise in many service-wide areas.

This oversight is particularly important and valued by small and medium-sized parks, which represent a large percentage of our park units. These parks lack sufficient staff to oversee complex issues involving maintenance contracts, partnership fundraising agreements, disciplinary matters, environmental compliance, and similar issues. Staff in the central and regional offices performs much of this work and its unavailability would result in a greater lack of compliance with law, policy, rules and regulations by the parks, leading to more investigations and oversight hearings by Congress when mistakes are made. And additional training of park staff is not the answer as approximately one percent of the NPS budget goes to training needs. These funds are often reduced or eliminated when funding does not keep up with costs and the parks have much higher priorities.

Similarly, we have found that moving people to the parks does not always work as intended when the skill sets of people from central and regional offices do not meet the needs of the parks. And when people with specific scientific, cultural, or program skills are placed in parks with the intent of having those people service several parks, their work plans are often upended as these individuals are easily co-opted to handle the immediate needs of the parks where they are located.

Similarly, the development of the National Biological Survey resulted in a dramatic limitation on the availability of people to handle park science as the NBS scientists established their own priorities, which did not necessarily reflect the immediate needs of the parks and which was contrary to what the bureaus in the department were told when the NBS was created. As a result, in the late 1990s, the Park Service developed the Natural Resource Challenge, with a goal of an additional \$100 million in appropriations to reestablish the NPS' scientific capacity that had been lost in the creation of the NBS and to strengthen natural resource management in the service. This effort proved successful when Congress responded with new funding for the initiative in the years that have followed. Parks now have scientists available to handle park and service-wide matters on a timely basis.

In a similar manner, the reorganization of the hiring and staffing functions resulted in fewer people being available to respond to the needs of the same number of NPS employees. This has led to widespread dissatisfaction within NPS with the length of time it takes to hire someone, routinely being at least six to nine months. The freeze on hiring by the Trump Administration for Washington and regional offices only exacerbates this problem.

And regardless of the intent of this reorganization by this administration, it will not address the loss of staff the Park Service has suffered since 2001 and the resulting effect this reduction has had

on the service's ability to provide for visitor enjoyment while maintaining the parks' resources and facilities. Since 2001, the parks have lost the capacity to hire over 1,400 people due to annual NPS appropriations not keeping up with costs and with inflation. For too many years, the Park Service has been required to absorb fixed costs, and appropriations have not kept up with costs associated with employee salaries and benefits.

This funding dilemma is being felt not only in parks, but in the Washington and central offices where the oversight and support provided to parks is being undermined by fewer people being able to service those requests. An example is within the service's cultural resources program that has lost 19 percent of its staff since 2011. During this same time period, the cultural resource stewardship responsibilities of the Park Service have increased, with the number of museum objects maintained by the service nearly doubling, as just one example. This lack of staffing was perhaps most notable in recent years at Effigy Mounds National Monument where a park established to protect nationally significant archeological resources did not have the appropriate cultural resources staff to care for these resources, resulting in an extensive system of boardwalks being constructed through more than 200 native American sacred mounds without any environmental compliance or consultation with native American groups. The resulting Park Service and Inspector General investigations of this matter also pointed to the lack of adequate training as one of the contributing factors toward this incident.

Additionally, NPS annual appropriations are being spread thinner as Congress continues to increase the responsibilities given to the Park Service through the addition of new parks and programs. Over the last 20 years, NPS has been asked to manage 45 new parks, 12 more national trails, 12 new wild and scenic rivers, and to coordinate assistance for 8 new affiliated areas and 45 national heritage areas, along with 10 major grant programs. During last year's National Park Service Centennial, 324 million people visited our 417 national parks in all 50 states and several territories. While this record-breaking attendance was no doubt fueled by the Centennial celebration, it also is a reflection of the importance that these significant natural, cultural, and historic places have in the mind of the American public. Yet keeping up with these demands is proving more and more challenging with funding that has not kept up with the Park Service's costs.

We also question the effect the reorganization will have on the management of our national parks as one national park system as mandated by Congress in 1978. Regardless of the name attached to each of our 417 national park units, all of them are subject to the same park laws, rules, regulations, and policies unless specifically directed otherwise by Congress. While the intent of the reorganization may be to move staff closer to the people who live near the parks, we know the pressure that will be brought upon park superintendents to make a policy exception, to interpret a statute differently, or to look the other way when someone objects to a rule or regulation. Every exception establishes a precedent that will carry over to other parks facing similar issues and will only confuse the public when they see parks operating differently. And for every exception made, it weakens the national park system as a whole and the mandate Congress established to protect our resources unimpaired for future generations.

We believe there are other ways to achieve some of the goals desired by the administration without moving thousands of people from their current regions and establishing totally new office space in new communities throughout the country. We agree that communication and interaction within bureaus of the department is important. But we submit that this idea is not new.

Washington, park, and regional office staffs confer with their counterparts in other bureaus on a regular basis. These interactions are an every-day occurrence with the vast majority of the department's employees, just as they speak with federal, state, and local government officials, businesses, staff of private organizations, and members of the general public. Reviewing and better using these processes can achieve bureau coordination and cooperation without disrupting the lives of thousands of people or incurring the enormous costs associated with moving them and their families and establishing new office space.

We also question the need to create more regions when the 1995 reorganization did the exact opposite. There are now seven regions of the National Park Service, down from the ten that previously existed. If the administration's plan is implemented as we understand it, it would nearly double the number of regions for the National Park Service. This brings up, again, the reasoning behind this number and whether dialogue with the National Park Service and other bureaus within the department might result in something that is more effective for our national parks and public lands.

And while it is popular to denigrate federal employees who work in Washington, D.C. as bureaucrats, retaining a national presence in the city remains important due to the decision-making structure of the department. While we have heard that currently the National Park Service would retain its national presence in Washington, we understand that the heads of other departmental bureaus are planning to be moved out of the city. This decision will make it more difficult for the leaders of diverse departmental functions to meet in person in order to make decisions on common problems. While technology allows face-to-face meetings more frequently than in the past, being able to stop in the hallways to discuss issues leads to different and more-effective relationships and decision-making. A Washington office also allows leaders of the bureaus to work more efficiently with members of Congress, and other business and private organizations who maintain their presence in our nation's capital.

We hope that before this reorganization plan is implemented, the secretary's staff that developed the plan will take a step back and release details of the proposed plan. We also ask that they enter into a dialogue with the bureaus within the department to discuss the plan's impact on each bureau's operations to guarantee the plan is the most effective means of meeting the goals desired by this administration. This process will ensure that the cost associated with the reorganization is reasonable and that the mission of the bureaus will continue to be achieved in an effective manner for the American public consistent with the laws passed by Congress.

This completes my statement to the subcommittee. I would be glad to respond to any questions you may have.