



100YEARS

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For the Record for the House Natural Resources Committee Subcommittee on Oversight and Investigations' April 30th, 2019 Hearing "Oversight: No Road Map, No Destination, No Justification: The Implementation and Impacts of the Reorganization of the Department of the Interior"

Since 1919, National Parks Conservation Association (NPCA) has been the leading voice of the American people in protecting and enhancing our National Park System. On behalf of our more than 1.3 million members and supporters nationwide, I write to express our deep concern with the administration's proposal to reorganize the Department of the Interior (DOI). Particularly for a proposal of such magnitude, the effort should offer much greater transparency to the American public and to lawmakers and should allow for authentic opportunities for stakeholder involvement. A year into the proposal after many hours of work by personnel who have other matters to which to attend, there remains massive confusion. Foremost, it remains unclear what exactly the purpose of the proposal is beyond vague talking points, what precisely are the problems to be solved, and how the expenditure of valuable taxpayer dollars would better serve our public lands, their stewardship and the American public.

Among our chief concerns is that the conservation mission of the National Park Service (NPS) could be undermined by the proposed DOI regional leads. The concept of Interior Regional Directors is worrisome for several reasons, chief among them that DOI staff could have authority over NPS regional directors. Line authority over those NPS career staff would be detrimental to the autonomy and integrity of NPS decision-making to meet its unique mandate to protect resources and provide for public enjoyment insofar that it can be consistent with that protective responsibility. Even without line authority, the involvement of DOI staff in the careful and science-based decision-making of NPS threatens confusion and compromises to NPS' mission.

We are also concerned about the lack of transparency in how FY19 funds are being used and for what exactly valuable FY20 funds would be used. Staff confusion and demoralization are additional threats posed by the proposal.

NPCA commends the committee's oversight of this important issue and supports your continuing work, and that of appropriators, in this regard. Absent any clarity from the administration on use of FY19 and FY20 funds and any clear, justifiable demonstration of the reasons for the reorganization, benchmarks, a timeline and realistic roadmap, and assurances that the effort would ultimately benefit our public lands and the Americans who own them, we urge the Congress to take appropriate and immediate measures to prevent DOI from engaging in this risky and dangerous effort.