



HOUSE COMMITTEE ON
NATURAL RESOURCES
CHAIRMAN BRUCE WESTERMAN

To: Subcommittee on Oversight and Investigations Republican Members
From: Subcommittee on Oversight and Investigations staff,
Michelle Lane (michelle.lane@mail.house.gov) and James Lundquist
(james.lundquist@mail.house.gov) x6-8747
Date: Thursday, July 27, 2023
Subject: Oversight Hearing on “*Examining Barriers to Access: Ongoing Visitor Experience Issues at America’s National Parks*”

The Subcommittee on Oversight and Investigations will hold an oversight hearing titled “*Examining Barriers to Access: Ongoing Visitor Experience Issues at America’s National Parks*” on **Thursday, July 27, at 2:00pm EDT in 1324 Longworth House Office Building.**

Member offices are requested to notify Sophia Varnasidis (Sophia@mail.house.gov) by 4:30 p.m. on July 26, 2023, if their Member intends to participate in the hearing.

I. KEY MESSAGES

Mismanagement of America’s National Park System harms the economies of rural and gateway communities, restricts access and recreational opportunities, and prohibits desperately needed management of our overgrown, diseased, and dying public lands.

- Despite significant additional resources provided by Congress over the last several years, the National Park Service (NPS) has failed to reduce their deferred maintenance (DM) backlog and develop a strategy to prevent increasing the DM backlog in the future.
- It is imperative for NPS to better manage National Park System units to mitigate overcrowding and its effects on the land, while ensuring access to the National Park System without burdensome fees and permits.

II. WITNESS

- **The Honorable Charles F. Sams III**, Director, National Park Service, Washington, DC [or designee]

III. BACKGROUND

The mission of NPS is to protect “unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations.”¹ NPS manages 424 individual units covering more than 85 million acres in all 50 states, the District of Columbia, and U.S. territories.²

NPS continues to grapple with a number of challenges across the National Park System. The challenges include crumbling infrastructure and growing maintenance backlogs; unhealthy, overgrown forests that contribute to our nation’s wildfire crisis; and diminished access and opportunities for outdoor recreation.

A. History

On April 20, 1832, President Andrew Jackson designated the area now known as Hot Springs National Park in Arkansas as the first federal reservation, protecting the area of the hot springs and adjoining mountains. However, at the time, Congress failed to pass any legislation for administering the site. It wasn’t until August 25, 1916, that Congress established the NPS, and Hot Springs Reservation came under its administration, making Hot Springs National Park the oldest national park among current National Park units.³

On March 1, 1872, President Ulysses S. Grant signed into law an act establishing Yellowstone National Park, officially titled “An Act to set apart a certain Tract of Land lying near the Headwaters of the Yellowstone River as a public Park.”⁴ Yellowstone National Park was placed under the control of the Secretary of the Interior who was responsible for developing regulations to “provide for the preservation, from injury or spoliation, of all timber, mineral deposits, natural curiosities, or wonders within said park, and their retention in their natural condition.”⁵ Other park functions authorized by the Act included developing visitor accommodations, building roads and trails, removing trespassers, and protecting “against wanton destruction of fish and game.”⁶

In 1906, President Theodore Roosevelt signed An Act for the Preservation of American Antiquities (The Antiquities Act of 1906)⁷ into law, which authorized the President to proclaim national monuments on federal lands that contain “historic landmarks, historic and prehistoric

¹ *About Us*, NATIONAL PARKS SERVICE, <https://www.nps.gov/aboutus/index.htm> (last visited July 12, 2023).

² *About the National Park Service*, NATIONAL PARK SERVICE, <https://www.nps.gov/aboutus/aboutus.htm#:~:text=About%20the%20National%20Park%20Service,-Grand%20Canyon%20NP&text=The%20National%20Park%20Service%2C%20a,U.S.%20Virgin%20Islands%2C%20and%20Guam> (last visited July 10, 2023).

³ *History & Culture*, NATIONAL PARK SERVICE, <https://www.nps.gov/hosp/learn/historyculture/index.htm> (last visited Jul. 12, 2023).

⁴ *Act Establishing Yellowstone National Park: Primary Documents in American History*, LIBRARY OF CONGRESS, <https://www.loc.gov/rr/program/bib/ourdocs/yellowstone.html#:~:text=An%20act%20establishing%20Yellowstone%20National,created%20the%20first%20national%20park> (last visited July 12, 2023).

⁵ *Yellowstone National Park Protection Act (1872)*, NATIONAL PARK SERVICE, <https://www.nps.gov/yell/learn/management/yellowstoneprotectionact1872.htm> (last visited July 12, 2023).

⁶ *Id.*

⁷ An Act for the Preservation of American Antiquities, 16 U.S.C. §431, et seq.

structures, and other objects of historic or scientific interest.”⁸ In doing so, the President is to reserve “the smallest area compatible with the proper care and management of the objects to be protected.”⁹ The Antiquities Act of 1906 authorizes the President to create national monuments on land that is already federally owned or controlled, and that contains historic landmarks, historic and prehistoric structures, or other objects of historic or scientific interest.¹⁰

After signing it into law, President Roosevelt used the Antiquities Act eighteen times to establish national monuments, including the Grand Canyon National Monument, Petrified Forest National Monument, Chaco Culture National Monument, Lassen Volcanic National Monument, Tumacacori National Monument, and Olympic National Monument. In the years following, national parks and monuments were authorized or proclaimed, principally from the public domain lands in the West, and administered by federal land management agencies of the Department of the Interior (DOI) and the Department of Agriculture (USDA).¹¹

On August 25, 1916, President Woodrow Wilson signed the Organic Act creating the NPS, a new federal agency under DOI tasked with the responsibility for protecting the national parks and many of the monuments then in existence and those yet to be established.¹²

Before 1933, monuments were managed by different agencies.¹³ But, in that year, President Franklin D. Roosevelt consolidated management of national monuments in the NPS by transferring the management of 63 national monuments and military sites from the U.S. Forest Service (FS) and the War Department to NPS.¹⁴ The consolidation represented a major step in the development of the National Park System.¹⁵

In 1970, President Richard Nixon signed the General Authorities Act, which stated that all NPS units are part of “one national park system preserved and managed for the benefit and inspiration of all people of the United States.”¹⁶ In 1978, Congress amended the General Authorities Act to reassert the system-wide standard of protection for all areas administered by NPS.¹⁷

⁸ Originally codified as 16 U.S.C. §§431-433, recodified to 54 U.S.C. §§320301-320303.

⁹ 54 U.S.C. §320301.

¹⁰ 54 U.S.C. §§320301 et seq. For more information, see Carol Hardy Vincent, CONG. RESEARCH SERV., R41330, *National Monuments and the Antiquities Act* (May 3, 2023), <https://www.crs.gov/reports/pdf/R41330/R41330.pdf>. Most monuments are managed by NPS, with many newer monuments managed by the Bureau of Land Management or other agencies. Extensions or establishment of monuments in Wyoming require the authorization of Congress (54 U.S.C. §320301(d)), and withdrawals in Alaska exceeding 5,000 acres are subject to congressional approval (16 U.S.C. §3213).

¹¹ *Quick History of the National Park Service*, NATIONAL PARK SERVICE, <https://www.nps.gov/articles/quick-nps-history.htm> (last visited July 12, 2023)

¹² *Id.*

¹³ Carol Hardy Vincent, CONG. RESEARCH SERV., R41330, *National Monuments and the Antiquities Act* (May 3, 2023), <https://www.crs.gov/reports/pdf/R41330/R41330.pdf>.

¹⁴ EXEC. ORDER NO. 6166 (June 10, 1933), <https://www.archives.gov/federal-register/codification/executive-order/06166.html>.

¹⁵ *Quick History of the National Park Service*, NATIONAL PARK SERVICE, <https://www.nps.gov/articles/quick-nps-history.htm> (last visited July 12, 2023).

¹⁶ The General Authorities Act of 1970, 16 U.S.C. §1a-1, §1c.

¹⁷ The Redwoods National Park Act, 16 U.S.C. §1a-1.

In 1980, President Jimmy Carter signed the Alaska National Interest Lands Conservation Act¹⁸ (ANILCA) into law, which roughly doubled the acreage of the National Park System due to the large size of the new parks designated in Alaska.¹⁹ ANILCA added more than 47 million acres to the National Park System.²⁰

In 1998, President Bill Clinton signed the National Park Omnibus Management Act²¹ into law, which directed reform of the process by which areas are considered for addition to the National Park System. The legislation specified that no study of the potential of an area for inclusion in the National Park System be made without authorization by Congress. It also directed NPS to reform their concessions management practices, resulting in development of new regulations for concessions contracts, commercial use authorization, and the use of franchise fees.²²

In 2020, President Donald Trump signed into law the Great American Outdoors Act²³ (GAOA). GAOA established a new, mandatory fund known as the “National Parks and Public Land Legacy Restoration Fund” (LRF) to address the deferred maintenance needs of NPS and the other land management agencies.

B. National Park System Units

The National Park System’s units currently fall under 20 different designations – national park, national monument, national preserve, national historic site, national recreation area, national battlefield, and numerous others.²⁴ The most relevant units for this Committee hearing are described below:

- National Parks: The 63 national parks contain some of the most popular natural attractions in the United States and tend to be among the most strictly protected park units – Congress has historically been reluctant to authorize activities such as mining or hunting in national parks.²⁵

¹⁸ Alaska National Interest Lands Conservation Act, 16 USC Ch. 51.

¹⁹ P.L. 96-487; *see also* 16 U.S.C. §3213; Carol Hardy Vincent, Cong. Research Serv., R41330, *National Monuments and the Antiquities Act* (May 3, 2023), <https://www.crs.gov/reports/pdf/R41330/R41330.pdf>.

²⁰ *National Park System Timeline (Annotated)*, NATIONAL PARK SERVICE, https://www.nps.gov/parkhistory/hisnps/npshistory/timeline_annotated.htm (last visited July 12, 2023).

²¹ National Park Omnibus Management Act of 1998, Pub. L. No. 105–391, <https://www.govinfo.gov/content/pkg/PLAW-105publ391/pdf/PLAW-105publ391.pdf>.

²² *National Park System Timeline (Annotated)*, NATIONAL PARK SERVICE, https://www.nps.gov/parkhistory/hisnps/npshistory/timeline_annotated.htm (last visited July 12, 2023).

²³ The Great American Outdoors Act, Pub. L. No. 116–152, <https://www.govinfo.gov/content/pkg/PLAW-116publ152/pdf/PLAW-116publ152.pdf>.

²⁴ Laura B. Comay, CONG. RESEARCH SERV., R41816, *National Park System: What Do the Different Park Titles Signify?* (Feb. 7, 2022), <https://crsreports.congress.gov/product/pdf/R/R41816>.

²⁵ *Id.*

- National Monuments: Established by Congress or proclaimed by the President under the Antiquities Act of 1906.²⁶ Many of the system's 84 national monuments contain historical or archaeological artifacts, others are notable for natural features or recreational opportunities.²⁷
- National Preserves: The 19 national preserves are similar to national parks in size and natural features but typically allow uses, such as hunting or oil and gas exploration, that Congress considered incompatible with a national park designation.²⁸
- National Reserves: The two national reserves are similar to national preserves except that both are managed in partnership with state, local, or private entities.²⁹
- National Recreation Areas: NPS manages 18 national recreation areas.³⁰ This designation originally was given to areas that surround Bureau of Reclamation reservoirs and feature water-based recreation; it has since been used for recreational units in or near urban centers. Activities such as boating, fishing, or hunting may be authorized in establishing legislation.³¹
- National Lakeshores and National Seashores: The 10 national seashores are on the Atlantic, Gulf, and Pacific coasts, and the three national lakeshores are on the Great Lakes. Both recreation and natural resource preservation are prioritized in these units. A number of national seashores and lakeshores permit hunting and fishing.³²
- National Rivers, and Wild and Scenic Rivers: Under the Wild and Scenic Rivers (WSR) Act of 1968, Congress has preserved rivers in a free-flowing state, or in other words, unaltered by dams or channels.³³ NPS manages 10 wild and scenic rivers as stand-alone park units, and others as parts of broader NPS units. Additionally, four national rivers or riverways were designated outside the WSR Act. The rivers offer hiking, canoeing, and other outdoor activities.³⁴

²⁶ 54 U.S.C. §§320301-320303; Carol Hardy Vincent, CONG. RESEARCH SERV., R41330, *National Monuments and the Antiquities Act* (May 3, 2023), <https://www.crs.gov/reports/pdf/R41330/R41330.pdf>. Agencies other than the Park Service, including the U.S. Forest Service, the Bureau of Land Management, and the Fish and Wildlife Service, also administer national monuments.

²⁷ Laura B. Comay, CONG. RESEARCH SERV., R41816, *National Park System: What Do the Different Park Titles Signify?* (Feb. 7, 2022), <https://crsreports.congress.gov/product/pdf/R/R41816>.

²⁸ *Id.*

²⁹ *The National Parks: Index 2012-2016*, p.9, NATIONAL PARK SERVICE (2016) <https://www.nps.gov/aboutus/upload/npindex2012-2016.pdf>.

³⁰ The U.S. Forest Service also administers many national recreation areas. For more information, see Katie Hoover, CONG. RESEARCH SERV. R41285, *Congressionally Designated Special Management Areas in the National Forest System* (June 11, 2020), <https://crsreports.congress.gov/product/details?prodcode=R41285>.

³¹ Laura B. Comay, CONG. RESEARCH SERV., R41816, *National Park System: What Do the Different Park Titles Signify?* (Feb. 7, 2022), <https://crsreports.congress.gov/product/pdf/R/R41816>.

³² *Id.*

³³ P.L. 90-542; see also Anne A. Riddle CONG. RESEARCH SERV., R45890, *Wild and Scenic Rivers: Designation, Management, and Funding* (Aug. 28, 2019), <https://sgp.fas.org/crs/misc/R45890.pdf>.

³⁴ Laura B. Comay, CONG. RESEARCH SERV., R41816, *National Park System: What Do the Different Park Titles Signify?* (Feb. 7, 2022), <https://crsreports.congress.gov/product/pdf/R/R41816>.

- National Trails: Congress has established national trails under the National Trails System Act of 1968.³⁵ NPS manages three national trails as full park units; all are designated as “national scenic trails” and wind through multiple states.³⁶
- National Historic Sites: The 74 national historic sites designate places significant to U.S. history.³⁷ Many are structures of historical interest, such as the homes of notable Americans, or buildings where important events occurred.³⁸
- National Historical Parks: Like national historic sites, the 61 national historical parks are notable for their connection with events or people of historical interest. These entities usually extend beyond a single building or property.³⁹
- National Battlefields, Battlefield Sites, Battlefield Parks, and Military Parks: The 11 national battlefields, one national battlefield site, four national battlefield parks, and nine national military parks all designate locations of significant military actions. They include landscapes where battles occurred, and military and civilian structures in those areas.⁴⁰
- National Memorials: National memorials need not be located at historically significant sites. Instead, many of the 31 national memorials, such as the Washington Monument or the Thomas Jefferson Memorial are structures erected to commemorate people or events.⁴¹

Except for national monuments, which may be designated by Congress or through presidential proclamation, National Park System units are created by acts of Congress. When Congress passes legislation to create a National Park System unit, Congress may explain the unit’s purpose; set its boundaries; provide specific directions for land acquisition, planning, uses, and operations; and authorize appropriations for the unit’s acquisition and development. Bills to create new National Park System units generally are within the jurisdiction of the House Committee on Natural Resources and the Senate Committee on Energy and Natural Resources. The NPS’ appropriations are provided through the annual Interior, Environment, and Related Agencies’ appropriations acts.⁴² Congress may enact legislation to add new units to the National Park System either by passing standalone legislation or as part of larger omnibus public land laws containing many federal land management related provisions.⁴³

³⁵ P.L. 90-543. For more information, see Mark K. DeSantis and Sandra L. Johnson, CONG. RESEARCH SERV., R43868, *The National Trails System: A Brief Overview* (June 10, 2019), <https://crsreports.congress.gov/product/pdf/R/R43868/8>.

³⁶ Laura B. Comay, CONG. RESEARCH SERV., R41816, *National Park System: What Do the Different Park Titles Signify?* (Feb. 7, 2022), <https://crsreports.congress.gov/product/pdf/R/R41816>.

³⁷ The international historic site is St. Croix Island, site of an early French settlement on the Canadian border. NPS manages the unit in cooperation with Parks Canada, and parts of the park lie on both sides of the border.

³⁸ Laura B. Comay, CONG. RESEARCH SERV., R41816, *National Park System: What Do the Different Park Titles Signify?* (Feb. 7, 2022), <https://crsreports.congress.gov/product/pdf/R/R41816>.

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *Id.*

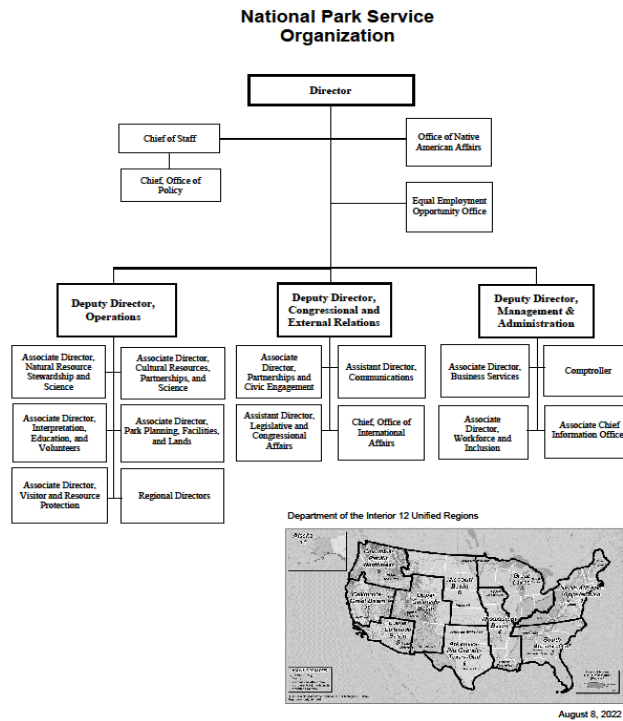
⁴² Laura B. Comay, CONG. RESEARCH SERV., RS20158, *National Park System: Establishing New Units* (Apr. 6, 2022), <https://crsreports.congress.gov/product/pdf/RS/RS20158>.

⁴³ For instance, P.L. 116-9, a public lands omnibus measure enacted in March 2019, authorized the establishment of several new park units.

Legislation creating a new National Park System unit often is preceded by legislation to authorize an NPS study of the area. Current law does not explicitly require an NPS special resource study before Congress adds a unit, but any such study does require “specific authorization of an Act of Congress.”⁴⁴ After funds are available, NPS must complete a study of an area within three fiscal years.⁴⁵ Studies must include at least one public meeting held in the local area, and reasonable efforts to notify affected state and local governments and landowners. Studies must comply with the National Environmental Policy Act (NEPA).⁴⁶

For the study, NPS must assess whether an area contains natural or cultural resources that are nationally significant, whether it constitutes one of the most important examples of a type of resource, and whether it is a suitable and feasible addition to the system.⁴⁷ NPS views an area as ‘suitable’ if it portrays a natural or cultural resource insufficiently included in the system, unless already managed for public use by another agency. An area is ‘feasible’ to add if it is large enough, configured to allow for long-term protection and public use, and affordable to manage.⁴⁸

C. Organization and Management



Source: *What we do (U.S. National Park Service)*, NATIONAL PARKS SERVICE, <https://www.nps.gov/aboutus/index.htm> (last visited July 12, 2023).

⁴⁴ Laura B. Comay, CONG. RESEARCH SERV., RS20158, *National Park System: Establishing New Units* (Apr. 6, 2022), <https://crsreports.congress.gov/product/pdf/RS/RS20158>.

⁴⁵ 54 U.S.C. §100507(c)(1).

⁴⁶ Laura B. Comay, CONG. RESEARCH SERV., RS20158, *National Park System: Establishing New Units* (Apr. 6, 2022), <https://crsreports.congress.gov/product/pdf/RS/RS20158>.

⁴⁷ *Id.*

⁴⁸ *Id.*

NPS manages the entirety of the National Park System. NPS is led by the Director who must be nominated by the President and Senate confirmed⁴⁹, with an immediate staff made up of career appointees⁵⁰ including two Deputy Directors, five Associate Directors, and numerous policy and program office managers. DOI’s Assistant Secretary for Fish, Wildlife, and Parks directly oversees NPS operations. Additionally, the NPS Advisory Board, composed of private citizens with requisite experience and expertise, advises on management policies and on possible additions to the System.⁵¹

The National Park System’s individual park units are arranged in 7 regional offices, with each headed by a Regional Director. The regional offices typically provide certain administrative functions, specialized staff services, expertise, and other assistance for the individual units under them. The individual units are overseen by a park superintendent, with staff generally commensurate with the size, public use, and significance of the unit.⁵²

D. Budget

For Fiscal Year (FY) 2024, the Biden Administration requested \$3.764 billion in discretionary appropriations for NPS. The requested amount is 8% higher than NPS’s FY2023 discretionary appropriation of \$3.475 billion enacted in P.L. 117-328, Division G of the Consolidated Appropriations Act, 2023. A summary of the Biden administration’s FY2024 budget request for the NPS is provided in the table below.⁵³

Table I. NPS Discretionary Appropriations by Account (\$ in millions)

Account	FY2023 Enacted (P.L. 117-328)	FY2024 Request	% Change from FY2023
Operation of the Nat'l. Park System	2,923.4	3,189.8	+9%
Construction	239.8 ^a	286.6	+20%
Historic Preservation Fund	204.5	177.9	-13%
Nat'l. Recreation and Preservation	92.5	95.2	+3%
Centennial Challenge	15.0	15.0	—
Total	3,475.3	3,764.5	+8%

Source: Laura B. Comay, CONG. RESEARCH SERV., IF12436, *National Park Service: FY2024 Appropriations* (June 26, 2023), <https://crsreports.congress.gov/product/pdf/IF/IF12436>.

⁴⁹ Christopher M. Davis, CONG. RESEARCH SERV., RL30959, *Presidential Appointee Positions Requiring Senate Confirmation and Committees Handling Nominations* (May 3, 2017), <https://crsreports.congress.gov/product/pdf/RL/RL30959/21>.

⁵⁰ *U.S. Government Policy and Supporting Positions—2020*, H. COMM. ON OVERSIGHT AND REFORM (Dec. 2020) <https://www.govinfo.gov/content/pkg/GPO-PLUMBOOK-2020/pdf/GPO-PLUMBOOK-2020.pdf>.

⁵¹ *National Park System Timeline (Annotated)*, NATIONAL PARK SERVICE, https://www.nps.gov/parkhistory/hisnps/npshistory/timeline_annotated.htm (last visited July 12, 2023).

⁵² *Id.*

⁵³ Laura B. Comay, CONG. RESEARCH SERV., IF12436, *National Park Service: FY2024 Appropriations* (June 26, 2023), <https://crsreports.congress.gov/product/pdf/IF/IF12436>.

NPS Discretionary Appropriations Accounts:

1. *Operation of the National Park System*: supports day-to-day activities, programs, and services at park units. These include resource stewardship, visitor services, park protection, facility operations and maintenance, and administrative costs.
2. *Construction*: covers repair, replacement, and improvement of existing facilities as well as new construction.
3. *Historic Preservation Fund*: funding goes to state and tribal historic preservation offices as formula grants to preserve cultural and historical assets.
4. *National Recreation and Preservation*: funds NPS programs that assist state, local, tribal, and private land managers with grants for outdoor recreation planning, natural and cultural resource preservation, and other activities.
5. *Centennial Challenge*: supports the National Park Centennial Challenge Fund which matches donations for projects or programs that further the NPS mission and visitor experience.⁵⁴

According to Congressional Research Service, “The administration also estimated \$1.2 billion in mandatory appropriations for NPS for FY2024, a decrease of 2% from the estimated NPS mandatory funding for FY2023. These mandatory appropriations come from entrance and recreation fees, concessioner fees, donations, and other sources, and include land acquisition funding from the Land and Water Conservation Fund (LWCF, 54 U.S.C. §§200301 et seq.), designated as mandatory appropriations by GAOA (GAOA; P.L. 116-152).”⁵⁵

E. Notable Recent Issues

NPS is currently dealing with a myriad of challenges including unhealthy, overgrown forests contributing to a wildfire crisis; crumbling infrastructure and growing maintenance backlogs; and diminished access and opportunities for outdoor recreation.

Forest Management and Wildfires

Americans, especially those in Western states, are dealing with severe wildfire seasons that last longer and produce more destruction than ever before. Decades of inadequate forest management have created an unprecedented forest health crisis. Across the U.S., there are now over 1 billion acres at risk of wildland fire.⁵⁶ More than 117 million acres of federal land, of which 63 million are managed by FS and 54 million are managed by DOI, are at high or very high risk of wildfire, representing nearly one-fifth of the combined federal lands administered by these agencies.⁵⁷

⁵⁴ *Id.*

⁵⁵ *Id.*

⁵⁶ Chris French, Testimony before the S. Energy and Natural Resources Comm. (June 24, 2021), <https://www.energy.senate.gov/services/files/AAF7DF40-2A47-4951-ADA4-4B124AD3894F>.

⁵⁷ Katie Hoover, CONG. RESEARCH SERV., *Federal Wildfire Management: Ten-Year Funding Trends and Issues (FY2011-FY2020)* (Oct. 28, 2020), <https://www.crs.gov/Reports/R46583?source=search&guid=8a080671120b4e7f92061e82e8a2bdf3&index=6>.

Despite the fearmongering of radical environmentalists, there is growing consensus among a broad array of stakeholders that recognizes the importance of active forest management, which is indisputably supported by sound science.⁵⁸ Active forest management encourages sustained healthy growth, while removing much of the dangerous fuels buildup that lead to catastrophic wildfires.⁵⁹ Healthy forests utilizing active forest management act as carbon sinks that sequester carbon while continuing to enable healthy new growth that is more resilient to natural threats.⁶⁰

For decades, land management agencies have consistently fallen short of carrying out forest management activities at the pace and scale necessary to truly confront the wildfire crisis in a meaningful way. There are a multitude of complex challenges that prevent increasing forest management activities at the pace and scale necessary to address the catastrophic wildfire crisis. While these challenges include agency funding and capacity, the greatest barrier to deploying active forest management activities is the complexity of compliance with environmental laws, frivolous lawsuits, and the long timelines associated with laws such as National Environmental Policy Act (NEPA), the Endangered Species Act, and the National Historic Preservation Act.⁶¹

While much of the attention to lack of forest management on federal lands is directed at the FS, NPS lands are heavily impacted by the wildfires and general mismanagement of their forests as well. From Florida to Maryland to California, NPS lands routinely succumb to wildfire.⁶² Notably, fires in the Sequoia and Kings Canyon National Park and in Yosemite National Park in California in recent years threatened to destroy remaining stands of ancient giant sequoia groves, a typically fire-resistant species.⁶³

Overcrowding in National Parks

More Americans than ever are choosing to recreate outdoors at public lands, fueling the outdoor recreation economy. In 2022, NPS received 312 million recreation visits, up 15 million visits (5%) from 2021. While not as high as 2018 and 2019 (318 million and 327 million recreation visits, respectively), service wide visitation has essentially recovered to pre-pandemic levels.⁶⁴ In addition to the recent increase in overall visitation numbers, changes are also occurring in visitation patterns. NPS has noted that many of their parks, which in previous years could count on a distinctive, quieter off-season, now no longer have an off-season.

Overcrowding can contribute to a poorer overall visitor experience, and can place a significant strain on the environment and infrastructure of the parks – with more people comes more litter,

⁵⁸ *Solutions*, AMERICAN FOREST RESOURCE COUNCIL, <https://amforest.org/solutions/> (last visited July 20, 2023).

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ Eric Edwards & Sara Sutherland, *Does Environmental Review Worsen the Wildfire Crisis?*, PERC (June 2022), <https://perc.org/2022/06/14/does-environmental-review-worsen-the-wildfire-crisis/>.

⁶² *Response to Wildfire Stories*, NATIONAL PARK SERVICE, <https://www.nps.gov/subjects/fire/response-to-wildfire.htm#:~:text=During%202020%20and%202021%2C%20two,earth%20killed%20in%20recent%20wildfires> (last visited Jul. 16, 2023).

⁶³ *Wildfires Kill Unprecedented Numbers of Large Sequoia Trees*, NATIONAL PARK SERVICE (Feb. 25, 2022), <https://www.nps.gov/articles/000/wildfires-kill-unprecedented-numbers-of-large-sequoia-trees.htm>.

⁶⁴ *Annual Visitation Highlights*, NATIONAL PARK SERVICE, <https://www.nps.gov/subjects/socialscience/annual-visitation-highlights.htm> (last visited July 20, 2023).

noise, and pollution from cars, longer lines, less available parking spaces, more instances of dangerous human-animal encounters, and damage to the natural environment.⁶⁵ For example, Professor Michael Childers, of Colorado State University, has studied the effects of overcrowding in Yosemite National Park on the indigenous giant sequoia trees, stating that “Yosemite overcrowding was damaging the rather shallow root systems of the giant sequoias” and that, “while the National Park Service did build a raised walkway to solve some of this problem, too many visitors driving to, parking and scrambling around the trees remains a problem.”⁶⁶

NPS has taken several steps to attempt to mitigate the damage done by overcrowding including using pilot projects and flexible planning tools to test ideas, conducting public and stakeholder engagement regarding long-term implementation plans to address park congestion, expanding social science research to track visitor information, implementing reservation systems, and investing in alternate transportation options.⁶⁷ However, overcrowding and its impacts persist in national parks across the nation, and therefore requires further attention from NPS and Congress.

National Park System Permits & Fees

The National Park System is popular because it offers an abundance of outdoor recreation opportunities including hunting, fishing, kayaking, camping, hiking, mountain biking, skiing, rock climbing, and many more activities. Unfortunately, outdoor recreation opportunities are not always easily accessible. Recreating on federal lands often requires special permits and the payment of fees that, while important to help maintain our federal lands, can involve confusing, cumbersome, and costly processes for both recreationists and recreation service providers.

NPS utilizes several fee strategies for the purpose of regulating access to federal lands and generating funds for operating and managing their units. Different fees are generally charged for entrance to National Park units, to provide permits for certain activities, and for informational services.⁶⁸

NPS offers three types of permits; commercial use authorizations (CUAs), special use permits (SUPs), and concessions.⁶⁹ A CUA allows an individual to conduct commercial activities and provide specific visitor services within a national park unit. A CUA is required to provide “any goods, activities, services, agreements, or other function for park visitors that take place at least

⁶⁵ Harry Baker, *Post-pandemic overcrowding of national parks causing bigger problems than just long lines*, LIVE SCIENCE (June 18, 2021), <https://www.livescience.com/overcrowding-us-national-parks.html>.

⁶⁶ *Id.*

⁶⁷ Jeff Bradybaugh, *Lessons from the Field: Overcrowding in National Parks*, DEP’T OF THE INTERIOR (Dec. 6, 2022), <https://www.doi.gov/ocl/overcrowding-parks#:~:text=Park%20Congestion%20and%20Overcrowding&text=In%202021%20and%202022%2C%20park,recieved%20297%20million%20recreation%20visits>.

⁶⁸ David Ostergren et al., *National Park Service fees: Value for the money or a barrier to visitation?*, JOURNAL OF PARK AND RECREATION ADMINISTRATION (Spring 2005), https://www.researchgate.net/publication/228666340_National_Park_Service_fees_Value_for_the_money_or_a_barrier_to_visitatio.

⁶⁹ *Permits*, AMERICAN MOUNTAIN GUIDES ASSOCIATION, <https://amga.com/permits/> (last visited July 14, 2023).

in part on lands managed by the NPS; use park resources; and result in compensation, monetary gain, benefit, or profit, when a concession contract is not necessary.”⁷⁰

A SUP authorizes activities that benefit individuals, groups or organizations, rather than the public at large, such as weddings, memorial services, special assemblies, and First Amendment activities.⁷¹ NPS may “permit a special park use if the activity will not cause derogation of park resources or values, visitor experiences, or the purpose for which the park was established.”⁷² Finally, concession permits are longer-term contracts for offering visitor services that, with a few exceptions, take place solely within the park.⁷³

Unfortunately, these fees can become barriers that restrict access to the public for visiting and recreating on federal lands. Opponents of fees argue that American citizens already pay for the management and operations of the national parks through their annual federal tax contributions, therefore additional fees should not be charged for accessing and recreating on these lands. Others may cite potential drawbacks with charging fees include “discrimination against low-income people, administrative headaches, and prioritizing revenue over resource protection and the time, hassle, and inconvenience to visitors.”⁷⁴

For example, commercial filming and photography in national parks requires a permit. For some, the time, effort, and expense involved with the permitting process could present a barrier to access. For example, at the Independence National Historical Park in Philadelphia, an applicant will need to pay a Commercial Film and Photography Non-refundable Processing Fee of up to \$1,000 per day, as well as a Location Fee of up to \$750 per day.⁷⁵ For a major entertainment company, these fees likely do not present a barrier to access. However, these fees can become insurmountable for the average American, who is, for example, posting videos of the national parks on their monetized YouTube channel, or for independent filmmakers with less resources.

Legacy Restoration Fund & Land and Water Conservation Fund.

As discussed *supra*, in 2020, President Trump signed the GAOA and established the LRF to address the deferred maintenance needs of NPS and the other land management agencies. The LRF is funded through 50 percent of the unobligated or “miscellaneous” revenues deposited into

⁷⁰ *Commercial Use Authorizations*, NATIONAL PARK SERVICE, <https://www.nps.gov/subjects/cua/index.htm#:~:text=A%20CUA%20is%20required%20if,concession%20contract%20is%20not%20necessary> (last visited July 14, 2023).

⁷¹ *Special Use Permits*, NATIONAL PARK SERVICE, <https://www.nps.gov/articles/000/special-use-permits.htm#:~:text=Special%20Use%20Permits%20authorize%20activities,assemblies%2C%20and%20First%20Amendment%20activities> (last visited July 14, 2023).

⁷² *Id.*

⁷³ *Doing Business with Us*, NATIONAL PARK SERVICE, <https://www.nps.gov/aboutus/doingbusinesswithus.htm#:~:text=Concession%20contracts%20are%20longer%2Dterm,incidental%20use%20of%20the%20park> (last visited July 14, 2023).

⁷⁴ David Ostergren et al., *National Park Service fees: Value for the money or a barrier to visitation*, JOURNAL OF PARK AND RECREATION ADMINISTRATION (Spring 2005), https://www.researchgate.net/publication/228666340_National_Park_Service_fees_Value_for_the_money_or_a_barrier_to_visitation.

⁷⁵ *Id.*

the U.S. Treasury from all forms of energy development including oil, gas, coal, and alternative or renewable energy sources – up to \$1.9 billion a year for five years (\$9.5 billion total).⁷⁶ Of the amounts deposited in the LRF each year, NPS receives a 70 percent share (\$1.33 billion) for priority deferred maintenance projects.⁷⁷ Under GAOA, the President submits a list of priority deferred maintenance projects to Congress with annual budget justifications.⁷⁸ The law allows for annual appropriations bills to make alternate allocations under the LRF; if no alternate allocation is enacted by Congress, the President’s list is fully funded.

Section 3 of GAOA also permanently re-authorized the LWCF and made \$900 million in spending annually from the Fund mandatory.⁷⁹ Congress created LWCF in 1964 to “preserve, develop, and ensure access to outdoor recreation resources.”⁸⁰ Prior to GAOA, LWCF was subject to appropriations and generally received less than \$900 million per year.⁸¹ Every year since GAOA’s enactment, LWCF has been credited with \$900 million, primarily from offshore oil and gas revenue.⁸² Under LWCF, at least 40 percent of funds shall be used for federal land acquisition and 40 percent of funds may be used to provide financial assistance to states. The law is silent on the remaining 20 percent.⁸³

Deferred Maintenance Backlog

Since GAOA’s passage, the LRF has not only failed to reduce deferred maintenance backlogs, the backlogs at each of the five land management agencies have *increased* – the NPS backlog increase is the most egregious. At the end of FY2019, the last full fiscal year before GAOA’s enactment, NPS reported a maintenance backlog of \$12.7 billion.⁸⁴ Four years later, in FY2022, the most recent year for which data is available, the NPS maintenance backlog rose to \$22.3 billion, reflecting an astounding \$9.6 billion increase from the pre-GAOA passage reported number.⁸⁵ This increase reflects two full years of GAOA funding to NPS, totaling \$2.66 billion.

⁷⁶ Note: There is no such thing as unobligated energy receipts. Energy revenues deposited into the Treasury before the passage of GAOA were used to pay other obligations of the U.S. government. Therefore, the Congressional Budget Office (CBO) scored GAOA as increasing the deficit by \$9.54 billion (<https://www.cbo.gov/system/files/2020-07/HR1957directspending.pdf>).

⁷⁷ *Id.*

⁷⁸ *Id.*

⁷⁹ *Id.*

⁸⁰ Carol Hardy Vincent, CONG. RESEARCH SERV., IF12256 *Land and Water Conservation Fund: Frequently Asked Questions*, (Nov. 23, 2022), <https://www.crs.gov/Reports/IF12256?source=search>.

⁸¹ Carol Hardy Vincent, et al., CONG. RESEARCH SERV., IF11636, *The Great American Outdoors Act (P.L. 116-152)* (Dec. 15, 2022), <https://www.crs.gov/Reports/IF11636?source=searchId>.

⁸² *Id.*

⁸³ 54 U.S. Code § 200304(b).

⁸⁴ *DOI Deferred Maintenance and Repairs by Asset Class As Reported in the Agency Financial Report, FY 2019 and FY 2020*, DEP’T OF THE INTERIOR, (2019-2020), https://naturalresources.house.gov/uploadedfiles/doi_fy2019_and_fy2020_deferred_maintenance_backlog_as_reported_in_the_afr.pdf.

⁸⁵ *DOI Deferred Maintenance and Repairs by Asset Class As Reported in the Agency Financial Report, FY 2020 and FY 2021*, DEP’T OF THE INTERIOR (2021), https://naturalresources.house.gov/uploadedfiles/doi_fy2021_deferred_maintenance_backlog_as_reported_in_the_afr_and_comparison_to_fy2020.pdf.

In response to the questions raised about such a colossal increase in their deferred maintenance backlog, NPS provided the following response explaining a recent change in the methodology the agency uses to calculate deferred maintenance that began in FY2022:

“Through 2018, and unlike other bureaus within the Department of the Interior, the National Park Service only calculated the cost of construction in its deferred maintenance figures and did not include the full scope of construction-related costs like design and construction management. National Park Service DM&R [deferred maintenance and repair] estimates now reflects this fuller and truer cost. The improved assessment process aligns with contemporary industry standards and the cost elements included in the figure are more consistent with other government DM&R calculations. Together, this provides a more comprehensive understanding of facility conditions.”⁸⁶

In their FY2024 budget justification, NPS further stated that the deferred maintenance backlog will be calculated using three components: (1) Parametric condition assessments for industry standard assets; (2) Federal Highways Administration assessments for infrastructure such as paved roads, parking lots, bridges and tunnels; and (3) work orders for concessions-occupied assets and non-industry standard assets.⁸⁷ With this adjustment, NPS now estimates its deferred maintenance backlog at the end of FY2022 was \$22.3 billion.⁸⁸

While a methodology change could explain a portion of the increase in backlog, it does not explain the full extent. The backlog increased from \$14.37 billion the year GAOA passed in FY2020 to \$21.8 billion in FY2021, the year before the new methodology was put into place. Between FY2021 and FY2022, the backlog increased by an additional \$500 million. NPS has cited a variety of other factors contributing to the rising backlog, including inflation and supply chain issues. In reality, a significant portion of this increase is due to mismanagement on the part of NPS. These concerns have been confirmed by the DOI Office of Inspector General (OIG), which released a report last year that found DOI lacked a strategy to maximize the impact of GAOA and failed to implement best management practices for deferred maintenance projects.⁸⁹ The absence of cohesive plans and best management practices places NPS and the entirety of DOI at risk of failing to adequately resolve its backlog of deferred maintenance projects.⁹⁰ The OIG’s concerns highlight the need for greater transparency and oversight in DOI’s decision-making process, its selection of LRF projects, and the Department’s monitoring of project progress.

⁸⁶ *Infrastructure*, NATIONAL PARK SERVICE, <https://www.nps.gov/subjects/infrastructure/faqs.htm> (last visited July 21, 2023).

⁸⁷ *FY 2024 Budget Justification*, NATIONAL PARK SERVICE, <https://www.doi.gov/sites/doi.gov/files/fy2024-nps-greenbook.pdf-508.pdf>.

⁸⁸ *Id.*

⁸⁹ OFF. OF INSPECTOR GEN., U.S. DEP’T OF THE INTERIOR, *The U.S. Department of the Interior Needs a Strategy to Coordinate Implementation of the Great American Outdoors Act*, (Mar. 23, 2022), <https://www.oversight.gov/sites/default/files/oig-reports/DOI/FinalInspectionGAOATaskForcePublic.pdf>.

⁹⁰ *Id.*

Transportation and Park Infrastructure

Transportation infrastructure is critical to ensuring access to the National Park System, as well as for providing protection for the wildlife and visitors. According to the National Parks Conservation Association, NPS manages more than 12,600 miles of roads, over 1,440 bridges and 127 transit systems, with nearly 40% of park roads in need of repair.⁹¹ Of the \$22.3 billion in the NPS deferred maintenance backlog, transportation projects consisting of trails, paved roads, unpaved roads account for \$6.96 billion, or 31% of the backlog.⁹² Congress has repeatedly made resources available to NPS to address this issue, however, NPS has largely failed to take advantage of available resources.

On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act (IIJA) into law, which provided funding through the Nationally Significant Federal Lands and Tribal Projects Program (NSFLTP) and the Federal Lands Transportation Program (FLTP) for the NPS to preserve and upgrade its transportation network.⁹³ The IIJA provided the FLTP \$1.7 billion over five years for NPS, starting with \$332 million in FY2022 and ramping up to \$360 million in FY2026. FLTP was established by Congress to improve the transportation infrastructure for the federal land management agencies including NPS.⁹⁴

In addition, the IIJA provided \$55 million in guaranteed annual funds to NSFLTP, or \$275 million over the next five years. Congress is authorized to appropriate up to \$300 million a year in additional funds, for a potential program total of \$1.5 billion over five years.⁹⁵ The NSFLTP provides funding for the construction, reconstruction, and rehabilitation of nationally significant projects within, adjacent to, or accessing Federal and Tribal lands.⁹⁶

Despite the immense increase in funding available for transportation projects for NPS, the deferred maintenance backlog continues to grow, and transportation projects remain in dire need of attention. The ongoing road closure in Denali National Park, Alaska, provides a clear example of how crumbling transportation infrastructure can critically impact a national park unit.

In August 2021, Park officials closed the Denali Park Road due to deteriorating conditions caused by the Pretty Rocks landslide, which intersects the road near its midpoint, and displaces

⁹¹ *Congress Passes Bipartisan Infrastructure Bill to Help Build Back and Strengthen National Parks and Communities*, NATIONAL PARKS CONSERVATION ORGANIZATION (Nov. 5, 2021),

<https://www.npca.org/articles/3002-congress-passes-bipartisan-infrastructure-bill-to-help-build-back-and>.

⁹² *FY 2024 Budget Justification*, National Park Service, <https://www.doi.gov/sites/doi.gov/files/fy2024-nps-greenbook.pdf-508.pdf>.

⁹³ Marcia Argust & Tom St. Hilaire, *New Infrastructure Law Includes Needed Funding for National Park Roads*, THE PEW CHARITABLE TRUSTS (Nov. 17, 2021), <https://www.pewtrusts.org/en/research-and-analysis/articles/2021/11/17/new-infrastructure-law-includes-needed-funding-for-national-park-roads>.

⁹⁴ *Federal Lands Transportation Program*, U.S. FEDERAL HIGHWAY ADMIN., <https://highways.dot.gov/sites/fhwa.dot.gov/files/docs/federal-lands/programs/federal-lands-transportation-program/8191/fast-fltp-fact-sheet.pdf> (last visited Jul. 14, 2023).

⁹⁵ Marcia Argust & Tom St. Hilaire, *New Infrastructure Law Includes Needed Funding for National Park Roads*, THE PEW CHARITABLE TRUSTS (Nov. 17, 2021), <https://www.pewtrusts.org/en/research-and-analysis/articles/2021/11/17/new-infrastructure-law-includes-needed-funding-for-national-park-roads>.

⁹⁶ *Nationally Significant Federal Lands and Tribal Projects (NSFLTP) Program*, FEDERAL HIGHWAY ADMINISTRATION (Jul. 6, 2023), <https://highways.dot.gov/federal-lands/programs/significant>.

100 yards of the full width of the road.⁹⁷ Today, the road remains completely unusable past that point, and the closure is expected to stay in place until summer 2026.⁹⁸ Denali National Park is Alaska's most popular national park and supports a robust outdoor tourism economy. The road closure shut off access to approximately half of the park, which continues to affect related businesses along the closed portion of road, the businesses in the gateway communities surrounding the park, as well as the overall visitor experience.⁹⁹

NPS must prioritize the development of an agency-wide strategy in order to take full advantage of the vast resources at their disposal to enhance and rebuild the crumbling transportation infrastructure in the National Park System.

Prioritizing Nancy Pelosi's Presidio for Deferred Maintenance

On August 16, 2022, President Biden signed into law the partisan budget reconciliation bill, the Inflation Reduction Act (IRA), which provided NPS \$200 million to spend on priority deferred maintenance projects at National Parks to complement the funding from initiatives like GAOA.¹⁰⁰

Instead of prioritizing projects of critical need, NPS decided to hand out a political favor to former Speaker of the House Nancy Pelosi. Every cent of the \$200 million in the IRA meant to address priority deferred maintenance projects went directly to the Presidio Trust in San Francisco, for projects on a 1,500-acre former military installation now used as a recreation area with pristine golf courses, high-end hotels, and luxury private homes and apartments.¹⁰¹ NPS Director Sams previously testified before the House Committee on Natural Resources Subcommittee on Federal Lands that DOI "transferred funding to the Presidio without any stipulations or restrictions on whether the Presidio's golf courses or luxury hotels would be eligible for federal funding for deferred maintenance or improvements."¹⁰²

Chairman Westerman sent a letter to Assistant Secretary for Fish and Wildlife and Parks Shannon Estenoz on April 21, 2023, requesting documents, communications, and further information regarding the IRA funding allocated to the Presidio Trust. Although Assistant Secretary Estenoz issued a response to the letter, she did not provide any of the documents or communications requested by the Chairman. On July 5, 2023, House Committee on Natural Resources Chairman Westerman sent a letter to the House Committee on Appropriations requesting, among other things, that the full \$200 million dollars appropriated to the Presidio be

⁹⁷ *Pretty Rocks Landslide*, DENALI NATIONAL PARK & PRESERVE (Apr. 13, 2023), <https://www.nps.gov/dena/learn/nature/pretty-rocks.htm>.

⁹⁸ *Current Conditions*, DENALI NATIONAL PARK & PRESERVE (June 10, 2023), <https://www.nps.gov/dena/planyourvisit/conditions.htm>.

⁹⁹ Yereth Rosen, *As three seasons of bridge work loom, Denali managers and tourist industry adjust*, ALASKA BEACON (June 3, 2023), <https://alaskabeacon.com/2023/06/03/as-three-seasons-of-bridge-work-loom-denali-managers-and-tourist-industry-adjust/>.

¹⁰⁰ *What the Inflation Reduction Act Means for Public Lands*, THE MOUNTAINEERS (Nov. 17, 2022), <https://www.mountaineers.org/blog/what-the-inflation-reduction-act-means-for-public-lands#:~:text=This%20will%20include%20%24500%20million,the%20Great%20American%20Outdoors%20Act.>

¹⁰¹ Press Release, H. Comm. on Natural Resources, *Westerman, Tiffany Investigate Pelosi's Presidio Park Payout* (Apr. 21, 2023), <https://naturalresources.house.gov/news/documentsingle.aspx?DocumentID=413093>.

¹⁰² *Id.*

rescinded and returned to the Treasury. The FY2024 Interior, Environment, and Related Agencies appropriations legislation, which was marked up on July 19, 2023, included the rescission requested by Chairman Westerman.

Plastics Ban for National Park System

In 2011 under President Obama, NPS issued Policy Memorandum 11-03 aimed at ending the sale of plastic bottled water in National Parks. The policy directed that plastic bottle reduction and elimination be implemented at all applicable National Park System operations, and the guidance incorporated for concessions at the parks.¹⁰³ The flawed policy targeted bottled water only, while allowing for the sale of other types of beverages such as carbonated soft drinks, sports drinks, beer and wine with plastic, glass, aluminum, and cardboard containers to be purchased in the National Park System.¹⁰⁴

Refillable water bottles, canned water, and other packaging alternatives that are widely available today for purchasing water, were not as readily available to producers or consumers in 2011, so the net impact was a massive reduction in access to water for visitors.

In 2017, under President Trump, NPS rescinded the flawed policy and once again allowed for the purchase of plastic water bottles across the National Park System, letting visitors decide for themselves how best to stay hydrated.¹⁰⁵

However, President Biden is now taking the Obama-era policy and drastically expanding it. Department of the Interior Secretary Haaland, on June 8, 2022, issued Order No. 3407, which directed the Department to phase out the procurement, sale, and distribution of single-use plastics by 2032.¹⁰⁶ This directive only serves to hurt visitors to the National Park System by driving up cost for consumers as businesses are forced to switch to alternative, more expensive materials for packaging and producing a variety of everyday items. Notably, this executive order applies to all types of single-use plastics, not just beverages, in parks that are often located in remote areas and have very few options for serving food to visitors.

IV. CONCLUSION

Despite Congress repeatedly providing NPS additional resources through annual appropriations, the GAOA, the IJIA, and the IRA, NPS has failed to address the numerous problems within the National Park System. NPS can take immediate steps to improve the overall visitor experience for the National Park System by reducing the burdensome fees and permits associated with visiting the parks and accessing certain activities; accelerating the deployment of active forest management activities in order to achieve healthy forests; and reducing the massive deferred

¹⁰³ Allison Aubrey, *Trump Administration Reverses Bottled Water Ban in National Parks*, NPR (Aug. 18, 2017), <https://www.npr.org/sections/thesalt/2017/08/18/544456726/trump-administration-reverses-bottled-water-ban-in-national-parks>.

¹⁰⁴ *Id.*

¹⁰⁵ *Id.*

¹⁰⁶ Order No. 3407, Dep't of the Interior (Jun. 8, 2022), <https://www.doi.gov/sites/doi.gov/files/elips/documents/so-3407.pdf>.

maintenance backlog while placing an emphasis on the improvement of transportation infrastructure across the National Park System.