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March 11<sup>th</sup>, 2021

Shawn Bengé  
Acting Director, National Park Service  
U.S. Department of the Interior  
1849 C Street, NW  
Washington, D.C. 20240

Dear Acting Director Bengé,

I write on behalf of The Pew Charitable Trusts, regarding the Great American Outdoors Act (P.L. 116-152).

Pew's Restore America's Parks campaign seeks to conserve the natural and cultural assets of the National Park System by providing common sense, long-term solutions to the deferred maintenance challenge facing the National Park Service (NPS). We were thrilled with enactment of the bipartisan GAO Act last summer—bolstered by wide-spread public support across the nation—resulting in the establishment of a dedicated fund to help restore priority park assets.

As you know, the Act directs up to nine billion dollars over five years towards infrastructure repair projects at federal land management agencies and Bureau of Indian Education schools. While the Act also fully funds the Land and Water Conservation Fund program, Pew's implementation work focuses on the deferred maintenance components of the law, and specifically the National Park Service, which will receive \$6.65 billion for repair needs.

It's imperative that the implementation of the GAO Act fulfill the intent of Congress, and the funds entrusted to NPS and other agencies be used as effectively as possible. We encourage NPS to develop accountability standards for implementation work, to regularly monitor progress and spending, and to develop benchmarks for success.

As NPS develops project criteria, accountability standards and benchmarks for success, we put forward the following points for consideration:



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- The GAO Act requires that National Parks and Public Land Legacy Restoration Fund (LRF) be directed toward “priority” needs. We urge NPS to choose projects that are deemed to be “highest” and “high” priorities.
- While roads, tunnels, bridges, parking lots, and other transportation assets are eligible for GAO funding, we urge NPS to follow the funding breakdown outlined under the Act. Since NPS receives the bulk of funding for transportation-related needs through the Surface Transportation Act, almost all the iterations of deferred maintenance proposals considered during the past two Congresses included language to ensure dedicated funding would be split in a way to achieve balance between park transportation and non-transportation assets. As a result, the final negotiation provided that 65% of the LRF go toward non-transportation work—such as water treatment systems and historic structures—and 35% go toward transportation projects.
- In selecting priority repairs to be undertaken each year with GAO Act funding, we encourage NPS to take into account a park unit’s plan and anticipated ability to sustain a project over time, ensuring the highest rate of return for investments made under the Act. Such plans should reflect important matters such as: climate resiliency of assets, energy efficiencies that have the potential to save tax-payer dollars, health and safety issues, and materials and technology that can significantly extend the life cycle of assets.
- Additionally, while we do not feel it should be a requirement, NPS should consider whether a GAO investment can leverage additional funding through revenue generation or private donations.
- We encourage the selection of repair projects that can be completed in a reasonable time frame, without diminishing the quality of work. While the Act allows monies to remain in the Fund until expended, obligation of funds on an ongoing basis over five years is preferable, and will demonstrate the agency’s efficiency in project management.
- Related to the point above, to ensure efficiency in obligation of funds and completion of projects, as well as to support cost-savings, we urge NPS to partner with federal agencies, Friends Groups, and organizations such as The Corps Network.



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- We recognize the expertise and project management experience within NPS, but believe that stakeholder engagement, transparency with the public, and frequent communication with key congressional committees will be critical to smooth implementation of the GAO Act over the next five years. The agency also may want to consider establishment of a temporary advisory committee—consisting of third-party entities—to provide additional input regarding GAO investments and to help amplify future achievements.

Pew is confident that NPS will succeed in its implementation of the GAO Act and that the resulting restoration of critical park assets will benefit park visitors and local economies for generations to come. We look forward to working with you on this effort and serving as a resource.

Sincerely,

Marcia Argust  
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