

NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations

Testimony of

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On

**Park Landscape Restoration Programs and Retention of Funds from Timber Removal
before the**

Subcommittee on National Parks

Committee on Resources

United States House of Representatives

December 19, 2005

Mr. Chairman and members of the Subcommittee, my name is Don Castleberry, and I had the privilege of having a 32-year career in the National Park Service (NPS). I held such positions as Park Ranger, Park Manager (of five different parks), Deputy Director of the Mid-Atlantic Region, Director of the Midwest Region, and (acting) Associate Director of Operations in Washington. I have served six years as member of the Board of Trustees of the National Parks Conservation Association (NPCA) and am now a member of NPCA's National Council. I also serve on the Executive Council of the Coalition of National Park Service Retirees. Since 1919, the nonpartisan National Parks Conservation Association has been the leading voice of the American people in protecting and enhancing our National Park System for present and future generations. Today we have 300,000 members nationwide who visit and care deeply about our national parks.

Managing the National Park System is an enormous undertaking for the National Park Service. The 388 units that comprise the National Park System include more than 30,000 structures and 80 million artifacts. The Park Service's portfolio includes 8,000 miles of roads, 1,500 bridges, 5,385 housing units, 1,500 water and wastewater systems, 200 radio systems, 400 dams and more than 200



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solid waste operations. Of the 388 units, at least 24 are national battlefield or military parks. These are all integrated into a magnificent, awe-inspiring repository of our collective American heritage.

As has been said, if the Smithsonian is our nation's attic, the national parks are the rest of the house.

Historic Landscape Restoration

NPCA supports restoring historic battlefields so they accurately depict the historic scene they are intended to convey, though there may be circumstances when complete restoration is inappropriate for a site. Many cultural and historic parks, such as Pea Ridge National Military Park, have management plans calling for the restoration of historic landscapes. Restoration of these landscapes can sometimes include the removal of timber or other natural features from the park. The subcommittee has requested we discuss whether it is desirable for parks to receive the proceeds from the sale of any marketable timber or other wood products removed as part of cultural or historic restoration activities.

As the subcommittee knows, NPCA has been working to improve park funding and park financial management and efficiency for many years. NPCA was an original partner with the Park Service in creating business plans for national parks and we continue to work with parks to implement money-saving strategies. At the same time, we also strive to ensure that the historic, cultural and natural resources preserved in our national parks are protected for the enjoyment of future generations. The situation at Pea Ridge is not unique. Many other park units that preserve important cultural sites are also engaged in restoration efforts. Indeed, timber cutting in such parks was contemplated by the founders of the Park System, who realized it occasionally might be necessary. The National Park Service's Organic Act permits the sale or disposal of timber in order to conserve scenery or

natural and historic resources in a park (16 USC 3). But, the authors of the Act did not provide park managers with the authority to keep revenue from the sale of timber. Any revenue resulting from the sale of federal public property, such as receipts from timber sales in parks, is deposited in the General Treasury, as directed by the Miscellaneous Receipts Act (31 USC 3302 (b)). In light of the significant funding shortfall faced by national parks across the country, the potential for an unwelcome incentive is significant, and should not be taken lightly. Nonetheless, there are creative ways to accomplish the landscape restoration needs of cultural parks in a manner that defrays some of the costs for the National Park Service. Below are some examples of parks where landscape restoration is underway or planned.

Pea Ridge National Military Park

In 1862, when the battle of Pea Ridge took place, the landscape had between 10 to 40 trees per acre. Due to the natural reforestation that has occurred since the park, the battlefield is now much more densely forested; in some places there are 200-300 trees per acre. Pea Ridge's management goal is to restore most of the historic landscape that the Union and Confederate soldiers fought on so that park visitors can better understand the field of battle and imagine the historic conflict. Pea Ridge has approximately 2000 acres that it plans to thin, but the park currently lacks a contracting officer to handle the process of bidding out the tree-thinning project to a private firm. With help from the University of Missouri's Forestry School, Pea Ridge determined that the current market value of the cedar, oak, and hickory trees slated for thinning would help support some of the cost of the battlefield restoration. However, the total estimated value of the timber to be thinned would not completely cover the entire cost of restoration. The park estimates that their per acre restoration cost, even if they did the thinning themselves and had the authority to capture the revenue from the

felled trees in the park, would come to just short of \$1800 per acre. Under current law, the Park Service does not appear to have the authority to retain the revenue from such a project. Rather, proceeds go to the General Treasury. However, methods for covering the costs of historic landscape restoration do exist. The experiences of the following parks may offer some guidance.

Gettysburg National Military Park

Gettysburg National Military Park was created in 1895 to protect the site of the largest and bloodiest battle of the Civil War. Today, natural succession processes have led to forests taking over former fields on the landscape over which this major battle took place. In an attempt to return the historic landscape to its 1863 appearance, the Park Service has undertaken a multi-year project to remove 576-acres of non-historic woods. According to the park, in all cases the cost of removing non-historic trees has far exceeded the value of timber. In fact, since 2001 the Park Service has awarded seven low-bid contracts for the removal of 320 acres at an average cost of \$1,706 per acre. As with other federal contracting regulations, bidders determine the salvage value of the timber, which is used for lumber or pulp, and deduct that value from the contract price.

As befits a national icon of Gettysburg's stature, the Park Service has taken extreme precautions in limiting adverse impacts to the park's cultural resources during these restoration projects. For instance, contractors must remove all tree branches from the site; are limited to felling trees solely in late-Fall or Winter to lessen soil disturbance; are prohibited from removing stumps due potential harmful impacts on archeological resources; and must grind stumps down to within four inches so that fields can be mowed. Such measures are extremely rare in the preparation of commercial timber

sales, but due in part to these precautions, 85% of the public comments made on the park's 1999 Environmental Impact Statement favored the proposal to restore the historical landscape.

Petersburg National Battlefield

Authorized by Congress in 1926, Petersburg National Battlefield was created to "commemorate the campaign and siege and defense of Petersburg, Virginia in 1864 and 1865 and to preserve for historical purposes the breastworks, earthworks, walls, or other defenses or shelters used by the armies therein, the battlefields at Petersburg, in the State of Virginia, are declared a national battlefield..." Like other Civil War battlefields the park has been faced with the challenge of what to do with trees that have taken over former treeless sections of the battlefield. After concluding that trees and woods are an unacceptable threat to earthworks and other park resources, the park began work in the mid-1990s to surgically remove non-historical trees.

Over the last three years, the park has spent \$365,000 to contract professional arborists to remove trees. Due to the threat to earthworks, excavators and cranes are utilized to limit soil disturbance and many trees are taken down in sections. Furthermore, park personnel are generally on hand to provide guidance to contractors. As a result of the significant care, special techniques and oversight required removing trees at the park, very little of the extracted wood is good for lumber or other marketable uses. The park did give some of the cut timber suitable for firewood to a Virginia state social services agency, which in turn distributed the firewood to needy people.

Other Models for Consideration

Big Thicket National Preserve in Texas was established in 1974 to protect a biologically rich region where southeastern swamps, eastern deciduous forest, central plains, pine savannas, and dry sand hills mix, creating a important mosaic of habitats for wildlife and plants. Soon after the park's creation, the Park Service began efforts to eradicate exotic slash pine and to re-establishing native long-leaf pine, which comprise only three percent of the species' former range. However, due to fiscal constraints, the Park Service discontinued the program in the early 1980s.

In an attempt to restart the program in the early 2000s, the park developed the North Turkey Creek Restoration Project for 51-acres of the preserve. While formulating the project, the park concluded that removing the slash pine from the site was the most "practical, economical, and ecologically beneficial of the options available." In an innovative arrangement, the Park Service entered into a cooperative agreement with The Nature Conservancy (TNC), who in turn disposed of the timber by contracting Temple Inland, a forestry company. Under the agreement, TNC also was required to return services at least equal to the value of the timber to the park. In subsequent years, TNC has financed chemical treatments and replanted long-leaf pines in the project area. Without entering into the cooperative agreement with TNC, the Park Service estimates that it would have had to spend \$2,500 per acre to dispose of the trees. Moreover, the Park Service has accomplished the projects goals of disposing the trees and saved money on other aspect of the project by partnering with TNC.

Pea Ridge could also consider Petersburg's donation model, donating the cut wood to a non-profit humanitarian group that helps the poor or homeless. Donating the timber may not bring any cost

recovery but it could help a group that builds houses for the poor; they could sell the timber themselves or use it for construction material. Or, as in Virginia, the group could distribute the smaller timber as firewood to those who might have trouble heating their homes this winter. These alternatives would not only help the needy, but also the park by building local good will.

NPCA believes the Park Service should help the park managers at Pea Ridge consider some of the options that I have mentioned above so that they can find ways to avoid wasting or burning the biomass resulting from their restoration project and create a practical and efficient method for using it.

Creative Solutions

We greatly appreciate the chairman's desire to identify efficiencies that can help support national park budgets. Creative efforts are necessary to assist our parks, which suffer from a \$600 million annual operating shortfall and a maintenance backlog estimated at between \$4.5 and \$9.7 billion. The breadth of this challenge requires the kind of reinvestment in our national parks that is contemplated by the National Park Centennial Act, which has been cosponsored by Arkansas congressmen John Boozman and Vic Snyder. No less important is the need to spend that money wisely.

National Park business plans provide important information about how well existing resources enable park managers and staff to accomplish their mission. The Business Plan Initiative, which the Park Service and NPCA founded together, helps strengthen financial management capabilities at parks and facilitate meaningful dialogue about park needs, as well as identify potential efficiencies.

Business plans have enabled many national parks to identify and address issues that saved money, leveraged additional resources, and improved management, among other things. For example, Gettysburg National Military Park and the Eisenhower National Historic Site, two separate units overseen by one superintendent, completed their business plan in 2002. In the past three years, the park units have acted on a number of the business plan's strategies for reducing costs and increasing non-appropriated funds. The park staff has implemented a Workforce Planning Strategy through which managers review every position as it becomes vacant to evaluate how critical those positions are to accomplishing the park mission. While this strategy does not help the park fill all necessary vacant positions, it does help them manage the vacancies better. One of the greatest achievements was the combining of Gettysburg and Eisenhower operations: Park managers have eliminated positions that were dedicated to site management and maintenance of Eisenhower and have made those tasks collateral duty for Gettysburg staff. The estimated savings of \$150,000 to \$180,000 annually enables the park to cover other critical needs at Gettysburg that were threatened by diminished ONPS spending power.

At Golden Gate National Recreation Area in California, the park followed through with its business plan recommendation to increase visitor fees at Muir Woods, capturing an additional \$700,000 annually; and the park has moved forward with transferring operating costs for building maintenance to third parties that occupy some of the many buildings in this former military base and improving energy conservation. The park has also leveraged its volunteer program; it now generates the equivalent work of 150 full-time equivalents a year.

These are only a handful of examples that reflect the power of business plan analysis. Parks face many fiscal issues and challenges every day, including questions about how to fund landscape restoration efforts. Business planning and implementation helps parks analyze and confront many of the challenges they face.

At the conclusion of the business plan partnership between the Park Service and NPCA, NPCA established the Center for Park Management to redouble our efforts to assist parks with business planning – this time with an emphasis on several critical areas: (1) helping parks follow through with their own business plans; (2) developing communications plans for parks; (3) helping park managers through the decision-making process regarding the steps to take in implementing solutions to needs identified in the plans; (4) identifying the management strategies most likely to produce the most beneficial results; and (5) helping to resolve any underlying staff or analytic challenges that impeded progress. NPCA and its Center for Park Management will continue to provide parks that request it assistance in implementing money-saving strategies and developing new tools to improve park efficiency so that NPS can better achieve its mission of protecting park resources and providing for visitor enjoyment.

Conclusion

In general, NPCA supports landscape restoration activities in cultural and historic parks, as long as they conform to the respective park unit's legislated mission, are in line with the goals stated in a park's management plans, and comply with other National Park laws and other mandates and regulations that protect natural and cultural resources. As each park unit has unique resources and

poses unique challenges to restoration, NPCA makes its own determination on whether to support proposed landscape restoration projects at individual parks after analyzing the site-specific issues.

Clearly, the national parks must make every dollar count, no matter the level of funding available, and park managers should be allowed to take creative steps within Park Service authority to cover the costs of necessary, mission-critical projects. If the Park Service leadership can provide clearer guidance on cost recovery options to the few parks that must do cultural landscape restoration, that seems an appropriate first step.

But caution is necessary. Innovative solutions should be discussed and considered but we must avoid putting park managers in a position where cost recovery is a primary goal. Parks should never stop seeking ways to increase efficiency, but they cannot be expected to function exactly like a private sector business. Stewardship of our national heritage – of the memories of the great battles that shaped our nation, of the magnificent places that can inspire future generations – is the paramount purpose of the National Park Service.