

**U.S. House of Representatives**  
**Committee on Natural Resources**  
**Washington, DC 20515**

July 9, 2024

The Honorable Gene Dodaro  
Comptroller General of the United States  
U.S. Government Accountability Office  
441 G Street, NW  
Washington D.C. 20548

Dear Comptroller General Dodaro:

As climate change continues to cause more extreme and damaging weather events, I am concerned that the National Park Service (NPS) may not have the resources to adequately model cultural resource preservation and vulnerability assessments in its programs. NPS' imperative to protect the nation's cultural resources is especially salient as the administration implements the Great American Outdoors Act, the Inflation Reduction Act, and the Infrastructure Investment and Jobs Act. When implementing crucial climate change adaptation and mitigation programs, NPS should model and assess cultural resources, thereby following requirements established in Section 106 of the National Historic Preservation Act.

NPS leads the nation in the care and management of our country's cultural resources throughout its programs.<sup>1</sup> Under OMB Circular A-16, NPS is designated the lead federal agency for the nation's cultural resources, tasked with providing standards, guidelines, and methods for sharing information related to our nation's cultural and historic resources.<sup>2</sup> In addition to managing various programs in national parks, NPS faces the challenge of a rapidly changing climate, which has the potential to dramatically affect ecosystems, disrupt wildlife, damage infrastructure, and threaten cultural and historic resources protected by NPS.

To mitigate such threats, NPS's climate change programming efforts require the creation of climate change vulnerability assessments (CCVAs) to assess the climate change impacts on existing units and resources.<sup>3</sup> Specifically, the CCVAs allow for the evaluation of infrastructure, natural resources, and cultural resources and help parks respond to climate change by identifying what is at risk and why. Although approaches differ for each type of vulnerability assessment, methods for evaluating infrastructure and natural resource assessments are typically better planned and more available than the assessments used to evaluate and preserve historic and cultural

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<sup>1</sup> National Park Service, "Climate Change and Stewardship of Cultural Resources," Policy Memorandum 14-02, U.S. Department of the Interior, February 10, 2014.

<sup>2</sup> Office of Management and Budget, "Coordination of Geographic Information and Related Spatial Data Activities," OMB Circular No. A-16, August 19, 2002.

<sup>3</sup> National Park Service, Climate Change Vulnerability Assessments in the National Park Service, Department of the Interior, September 2022.

resources.<sup>4</sup> It is vital that NPS's climate change efforts model cultural resource vulnerability assessments in areas of historic significance. This specific type of sustainability planning is important given the potential threat of losing our collective cultural heritage or aspects of their significance when making climate-related changes.

In its 2022 report on the CCVAs, NPS highlighted actions that could be taken to help improve future assessments of cultural resource vulnerability to climate change. These include:

- NPS implementing data-sharing, such as a report clearinghouse, for cultural resources vulnerability researchers
- Simplifying and making consistent the definition and usage of key vulnerability connects for cultural resources
- Better integration of cultural resource vulnerability assessments with natural resource and facilities vulnerability assessments
- Incorporating external partners with park personnel to help reduce the lack of subject matter expertise in integrating cultural resources vulnerability assessments with those related to natural and facilities
- Incorporating vulnerability assessment concepts and methods into appropriate cultural heritage educational materials
- Include National Park Service ethnographic overviews and assessments, where available, as well as local community involvement in scoping all cultural resources vulnerability assessments.

We request that the Government Accountability Office review NPS's efforts to incorporate cultural resources vulnerability assessments into climate change programming by examining the following:

1. What are NPS policies and guidance for preserving culturally historic sites when implementing climate change adaptation and mitigation efforts?
2. Does NPS have the resources it needs to incorporate, prioritize, and mitigate cultural preservation assessments into its climate change adaptation efforts?
3. What actions has NPS taken to incorporate cultural resource protections into its climate change adaptation and mitigation efforts?
4. What is the status of NPS's efforts to implement the recommendations made in its 2022 report related to cultural resource vulnerability assessments?

Thank you for your prompt attention to this matter. Please contact the Committee on Natural Resources Oversight and Investigations Subcommittee minority staff at (202) 225-6065 to discuss this request.

Sincerely,

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<sup>4</sup> Ibid.



Raúl M. Grijalva  
Ranking Member  
House Natural Resources Committee