



December 17, 2025

Senator Mike Lee
Chair, Senate Energy and Natural
Resources Committee
304 Dirksen Senate Building
Washington, DC 20510

The Honorable Bruce Westerman
Chair, House Committee on Natural
Resources
1324 Longworth House Office Building
Washington, D.C. 20515

Senator Martin Heinrich
Ranking Member, Senate Energy and
Natural Resources Committee
304 Dirksen Senate Building
Washington, DC 20510

The Honorable Jared Huffman
Ranking Member, House Committee on
Natural Resources
1324 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Lee, Chairman Westerman, Ranking Member Heinrich, and Ranking Member Huffman:

We write to express deep concern and strong opposition to the Trump Administration's reported plan to impose artificial limits on performance ratings for National Park Service (NPS) employees. According to [reports](#), this policy would effectively mandate that the vast majority of employees be rated a "3," regardless of documented performance, initial supervisory evaluations, or the clearly defined standards set forth in the Employee Performance Appraisal System (EPAPS).

This action raises serious legal concerns, reflects profoundly poor management practice, and is already inflicting measurable harm on employee morale, trust, and the effective stewardship of our national parks. Congress must exercise its oversight authority to halt this effort and demand accountability from the Department of the Interior and NPS leadership under Secretary Doug Burgum.

At its core, this policy greatly undermines the integrity of the federal performance evaluation system. Employees and supervisors alike entered the evaluation year under clear, written guidance that defined what constitutes fully successful, exceeding expectations, and outstanding performance. Supervisors evaluated employees against those benchmarks in good faith, documenting accomplishments that, in many cases, justified ratings of 4 or 5.

Now, after the fact, regions are reportedly instructing parks to retroactively "reset" EPAPS scores — without transparent guidance, without employee input, and with the clear directive that a rating of 3 should be the default. This approach is inconsistent with the purpose and design of the performance appraisal system.

More troubling, it may be unlawful. Federal personnel rules require that performance appraisals be accurate, job-related, and based on established criteria. Retroactively overriding documented evaluations to conform to a predetermined distribution raises serious questions under merit system principles and prohibitions against arbitrary and capricious personnel actions.

As you know, a lower performance rating can have direct financial impacts, affecting step increases, bonuses, and future opportunities. These concerns are magnified by the Administration's stated interest in a new reduction-in-force (RIF) framework that could prioritize performance ratings over tenure. In that context, artificially suppressing ratings is not a neutral administrative decision. It is a threat to livelihoods.

Morale within the National Park Service was already strained by chronic understaffing, budget uncertainty, and increasing visitation pressures. This policy has pushed many employees and managers past a breaking point. Anger and discouragement are widespread. Dedicated public servants who protect irreplaceable landscapes, safeguard cultural resources, and serve millions of visitors are being told — implicitly and explicitly — that excellence and professional judgment do not matter.

Perhaps most troubling is what this reveals about leadership at the highest levels of the Department of the Interior. Under Secretary Burgum's watch, NPS management appears willing to discard transparent standards, override professional judgment, and centralize control in a way that erodes the very foundations of the merit-based civil service. At best, this policy reflects a serious failure of management. At worst, it risks compelling supervisors to misrepresent employee performance on official documents in service of arbitrary and undisclosed objectives.

Our national parks are among America's most cherished public assets. And they are protected by skilled, committed professionals who believe in their mission. Undermining those professionals through illegal, ineffective, and demoralizing management practices puts the parks themselves at risk.

Congress has both the authority and the responsibility to intervene. We urge you to act swiftly to halt this policy, require transparency from the Department of the Interior, and reaffirm the principles of fairness, integrity, and excellence in federal service.

Sincerely,

Tim Whitehouse
Executive Director
Public Employees for Environmental Responsibility

Emily W. Thompson
Executive Director
Coalition to Protect America's National Parks

cc:

Speaker Mike Johnson
Majority Leader John Thune
Leader Charles Schumer
Leader Hakeem Jeffries
All members of the Senate Energy and Natural Resources Committee
All members of the House Committee on Natural Resources