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Resources, Community, and
Economic Development Division

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December 9, 1999

The Honorable James V. Hansen
Chairman, Subcommittee on
National Parks and Public Lands
Committee on Resources
House of Representatives

Subject: National Park Service: Information Concerning the Gettysburg National Military Park and Two of Its Partners

Dear Mr. Chairman:

This letter responds to your request for specific information concerning the National Park Service's Gettysburg National Military Park (the Park), located in Gettysburg, Pennsylvania, and two of its partners—the Gettysburg National Military Park Advisory Commission and the Friends of the National Parks at Gettysburg, Inc. Your specific questions, along with our responses, follow.

1. What is the nature of the relationship between the Gettysburg National Military Park and the Gettysburg National Military Park Advisory Commission?

The Gettysburg National Military Park Advisory Commission (the Commission) was created by Public Law 101-377 on August 17, 1990, to advise the Secretary of the Interior on coordinating the management of the Park and the Gettysburg Battlefield Historic District (the Historic District)¹ with local governmental jurisdictions. The Commission reports to the Park Superintendent, and the Park provides administrative support to the Commission, since its members are volunteers and it has no paid staff. The Commission is composed of 11 members:

- Five members represent each of the four Pennsylvania townships that surround the Park—Cumberland, Mount Joy, Mount Pleasant, and Straban—and the Borough of Gettysburg, Pennsylvania.
- One member represents the Adams County, Pennsylvania, government (the Park lies within Adams County).
- One member represents the Pennsylvania State Historic Preservation Office.
- Two members are Adams County residents. One owns land within the Park boundary and the other is knowledgeable about the Park and its resources.

¹The Historic District comprises land outside the boundary of the Park but close to it. These lands contain historic monuments and tablets commemorating the Battle of Gettysburg that were erected before Jan. 1, 1990.

- One member has expertise in local historic preservation.
- The Director of the National Park Service or his designee serves as an ex officio member.²

The Commission operates under a charter, signed on March 18, 1991, and by-laws, which define its day-to-day operations. According to the by-laws, the Commission's purpose is to encourage and foster public understanding and appreciation of the need to protect and properly interpret the Park and the Historic District; make recommendations for the short-term and long-term management of the Park; make recommendations for the protection, interpretation, and enhancement, as an historic site, of all battlefield lands included within the Park and the Historic District; and facilitate the coordination of the operations of the Park and the Historic District with local governments.

The by-laws also require that the Commission have a Chairman, Vice-Chairman, and other officers it deems necessary. The Chairman is the principal spokesperson for the Commission, and the Commission's recommendations are signed by the Chairman and forwarded to the Park Superintendent.

The law creating the Commission requires it to meet at least semi-annually. Its meetings are to be open to the public and announced, in advance, in local newspapers. Notices of Commission meetings must also be published in the Federal Register. Minutes of the meetings are to be prepared, reviewed, and approved by the Commission members and are kept in the office of the Park Superintendent. Items discussed at Commission meetings have included updates on the Park's operations, the Park's land protection plan, local and regional transportation issues, land acquisitions, and the management of the white-tailed deer population. Recent meetings have focused on the draft and final Park General Management Plan and Environmental Impact Statement, which includes a plan to construct a new visitor center and museum.³ At most of the Commission meetings, the Park received feedback from the public about its plans and operations.

✓ **2. What has been the tenure of the Gettysburg National Military Park Advisory Commission members? Have the seats of members whose terms have expired been filled in a timely manner, and, if not, what are the reasons for the delays?**

Filling the seats of Commission members whose terms have expired has involved delays ranging from 3 months to 22 months. Under the law creating the Commission, the original members were to serve staggered terms of 1 to 3 years. After the initial terms expired, all appointments have been for a 3-year period. The law also provides that Commission members can continue to serve until their successor has been appointed. The process for filling the seats of Commission members whose terms have expired depends on what locality or position the member is representing and generally involves the Park, the National Park Service's Office of Policy, and the Office of the Secretary of the Interior. Detailed information on nominating and appointing Commission members is contained in enclosure I.

Since the Commission began meeting in 1991, 16 individuals have been appointed as members, excluding the Park Superintendent.

²Since the Commission's inception, this position has been filled by the Park Superintendent. As an ex officio member of the Commission, the Park Superintendent attends Commission meetings but does not vote.

³The Record of Decision on the Final General Management Plan/Environmental Impact Statement was signed on Nov. 23, 1999.

- Five Commission members have served since August 1991 and represent the townships of Cumberland, Mount Joy, Mount Pleasant, and Straban and the Pennsylvania State Historic Preservation Office.
- Three Commission members served their initial 3-year term and were replaced in March 1994 by three new Commission members, who are still serving. One of these members represents the Adams County government, another is the Adams County resident who owns land within the Park, and the third is an Adams County resident who is knowledgeable about the Park's resources.
- The Commission member originally representing the Borough of Gettysburg was replaced in April 1997 by an individual who remains on the Commission.
- Finally, since August 1991, three different individuals have served as the member with expertise in local historic preservation.

The Park generally notified the National Park Service's Office of Policy several months before a member's term was due to expire, indicating that the nomination process needed to be started.⁴ The National Park Service's Office of Policy generally forwarded the nomination documentation to the Secretary of the Interior's office within 1 month, and nomination letters were sent out. Once the nominees were identified, the Park forwarded their names to the National Park Service's Office of Policy within 1 month. Once the National Park Service's Office of Policy received their names, it took from 1 to 12 months to forward them to the Secretary's office. Once the National Park Service's Office of Policy forwarded the names to the Secretary of the Interior's office, the Secretary took from 1 to almost 7 months to make the appointments.

We discussed the reasons for the delays with officials from the National Park Service's Office of Policy and the Department of the Interior who had been involved in the nomination and appointment process. The National Park Service's Office of Policy officials cited several reasons for the delays, including a heavy workload that occurs because there are about 50 other advisory commissions associated with the National Park Service; a lack of personnel because of buy-outs that occurred several years ago; and a need to prioritize the work of the various advisory commissions. The Department of the Interior officials, who are involved in the nomination and appointment process for all commissions, generally stated that delays could be due to incorrect paperwork or the unavailability of staff who are responsible for reviewing the paperwork. These officials generally stated that it takes from 2 days to 2 weeks for packages containing material on nominating or appointing commission members to go through their offices.

3. Are Gettysburg National Military Park Advisory Commission members whose terms have expired allowed to vote on matters before the Commission and can they serve as the Chairman of the Commission?

According to Public Law 101-377, any Commission member appointed for a definitive term may serve after the expiration of that term until a successor is appointed. Such a provision is common for National Park Service advisory commissions and is intended to ensure that they

⁴Data on each step in the process of nominating and appointing individual Commission members could be located in several different offices. We tried to obtain information on each step in the process for each Commission member's nomination and appointment but could not do so, in all cases, because data on certain steps in the nomination and appointment process were not available from the Park, the National Park Service's Office of Policy, or other Department of the Interior offices involved in the process.

can function if there are delays in appointing new members.⁵ Since a Commission member can serve until his or her successor is appointed, nothing prohibits a Commission member whose term has expired from voting on matters before the Commission or from serving as Chairman.

4. Has the Gettysburg National Military Park Advisory Commission held “pre-meetings” prior to its public meetings and, if so, does this violate the Federal Advisory Committee Act?

The Federal Advisory Committee Act generally applies to the Commission. Under the Federal Advisory Committee Act, advisory committee meetings are to be open to the public and interested parties are allowed to attend, appear before a committee, and file statements. These requirements do not apply if the head of an agency to which the committee reports determines that portions of meetings may be closed for one of the reasons set out in the Government in the Sunshine Act, which states that, to the extent practicable, the public is entitled to information about the decision-making process of the federal government. Public Law 101-377 requires the Commission to meet at least semi-annually and also requires that the meetings be public, that the public be notified about them in a timely manner, and that the meetings be held at locations and in such a manner as to ensure adequate public involvement. Also, the Commission’s by-laws require that a quorum of six Commission members be present at public meetings.

According to the Park Superintendent and the Commission Chairman, pre-meetings were held prior to the Commission’s public meetings beginning with the Commission’s first meeting on October 24, 1991, and continuing until January 1999. These pre-meetings are no longer held. The purpose of the pre-meetings, according to the Park Superintendent and the Commission Chairman, was to share information, discuss the agendas for the public meetings, receive briefings from Park staff on operational issues, tour Park properties, and discuss the status of land acquisitions by the Park. According to the Park Superintendent and the Commission Chairman, the pre-meetings were not open to the public. These officials further stated that one of the primary reasons for creating the Commission was to coordinate the status of land acquisitions, which, according to the Park Superintendent and Commission Chairman, are not subject to public disclosure until the transactions are finalized. According to the Park Superintendent and the Commission Chairman, Commission members were invited to attend the pre-meetings, but attendance was not required. In addition, the number of Commission members attending varied, and most meetings were attended by a minority of Commission members. The Park Superintendent and the Commission Chairman further stated that no votes were taken at the pre-meetings; no decisions were made; and no minutes, memoranda, or other meeting records were prepared.

According to the Park Superintendent, at the Commission’s January 21, 1999, public meeting, an individual in attendance challenged the legality of conducting the pre-meetings. A local attorney also wrote to the Park Superintendent objecting to the pre-meeting scheduled prior to the Commission’s April 14, 1999, public meeting. Accordingly, the Park Superintendent contacted the Department of the Interior’s Regional Solicitor and asked whether the pre-meeting could be held. The Regional Solicitor contacted the Park Superintendent and advised him that, while it did not appear the pre-meetings were illegal or inappropriate, it would be prudent to cancel future pre-meetings to avoid further accusations or appearances of impropriety. According to the Park Superintendent, this advice was verbally provided to

⁵Section 301(b) of P.L. 102-525, dated Oct. 26, 1992, provides that any member of any National Park Service advisory committee or commission “may serve after the expiration of his or her term until a successor is appointed.”

him, and no written Solicitor's opinion on this matter exists. As a result, the Superintendent canceled the April 14, 1999, pre-meeting and all future pre-meetings.

Advisory committee meetings are generally required to be open to the public. However, under the General Services Administration's regulations implementing the Federal Advisory Committee Act, some meetings of advisory committee members are not covered by the Federal Advisory Committee Act and the implementing regulations. For example, meetings of advisory committee members convened solely to gather or exchange facts or information to analyze issues are not covered. Crucial to whether the pre-meetings violated the Federal Advisory Committee Act is determining whether the pre-meetings were held to provide advice to the Park. If they were, they would be in violation of the Federal Advisory Committee Act. Because of the lack of information (no minutes, memoranda, or other meeting records), we were unable to determine whether advice was provided during these pre-meetings and, thus, whether the pre-meetings were held in violation of the Federal Advisory Committee Act.

5. Has the Gettysburg National Military Park Advisory Commission been timely in notifying the public about its meetings and have the meetings been held at a time and location to afford public involvement?

A General Services Administration rule on federal advisory committee management requires that a notice of an advisory commission meeting be published in the Federal Register at least 15 calendar days prior to the meeting. The Commission's by-laws require that a notice of a Commission meeting be published in local newspapers at least 10 calendar days prior to the meeting. The Commission has generally met quarterly since its inception, and a total of 30 meetings have been conducted, usually in January, April, July, and October.⁶

We located Federal Register notices for 28 of the Commission's 30 meetings.⁷ The Commission met the requirement that a notice be published in the Federal Register at least 15 calendar days prior to an advisory committee meeting in 17 instances.⁸ Ten Federal Register notices were published from 2 to 14 calendar days prior to the meetings, and one was published 4 calendar days after the meeting. The Park's requests for the National Park Service to publish these 11 notices in the Federal Register were sent from 9 to 42 days before the meetings, with the majority being sent 21 days or more before the meetings.

We attempted to determine why the 11 notices were not published within the required time frames. According to the National Park Service, it is required to retain records for only 2 years. Therefore, no records of requests for notices of Commission meetings held prior to the beginning of fiscal year 1998 were available. As a result, National Park Service officials could not comment on why seven of the Federal Register notices were not published 15 days prior to Commission meetings. Four of the 11 notices published less than 15 days prior to Commission meetings occurred since fiscal year 1998. For these four notices, National Park Service officials stated that it generally takes about 11 calendar days from the time the Park mails the request for a Federal Register notice to be published until it is actually published—or a total of about 26 calendar days is needed. According to these officials, delays occur if a weekend or holiday intervenes or if they receive incomplete information about a meeting

⁶Two meetings were canceled because of snow, one was canceled for lack of a quorum, and one was not held because of members' scheduling conflicts.

⁷We attempted to locate the remaining two Federal Register notices but were unable to do so.

⁸All Federal Register notices we obtained contained the required information such as the purpose, date, time, and location of Commission meetings.

from the Park. Such circumstances could have resulted in the Federal Register notices being published less than 15 days in advance of Commission meetings.

Regarding the notice of Commission meetings in the local media, Park officials stated that they have no control over when announcements of meetings are actually published in local newspapers. Therefore, we obtained copies of the news releases issued by the Park announcing the Commission meetings to determine whether they appeared 10 calendar days before the meetings occurred. We obtained news releases for 28 of the 30 meetings, and for the 2 remaining meetings, we obtained the published newspaper articles. Of the 28 press releases, 23 were issued at least 10 calendar days in advance of the Commission meetings and 5 were issued between 3 and 9 calendar days in advance of the meetings. The two newspaper articles we obtained were published at least 10 days prior to the meetings. Park officials said that some news releases were issued less than 10 days in advance of meetings because of a heavy workload prior to the meetings involving other Park issues and a lack of staff.

The Commission's charter and by-laws require that the Commission hold its meetings at times and locations that ensure adequate public involvement. According to the notices announcing the 30 Commission meetings, 18 were held at local Gettysburg hotels, 11 were held at the Park's public auditorium, and 1 was held at a Gettysburg elementary school. According to the minutes, all of the meetings were scheduled for at least 2 hours, and 16 were held at night from 7:00 pm to 9:00 pm. The other meetings were generally held between 2:00 pm and 5:00 pm.

6. Has any current or past Gettysburg National Military Park Advisory Commission member been directly or indirectly involved with any of the Gettysburg National Military Park's real estate transactions?

According to Park officials, the Park has been involved in 20 land transactions since January 1989, including purchases, donations, condemnations, a life estate trust, and land exchanges. Thirteen of these transactions involved the Park and private landowners. The remaining seven involved the Conservation Fund (three transactions), the Gettysburg Battlefield Preservation Association (two transactions), and the Friends of the National Parks at Gettysburg (two transactions). In these seven land transactions, the organizations negotiated with private landowners and acquired the land. The organizations then either donated the lands or sold the lands they had acquired to the Park.

None of the land transactions directly involved any member of the Commission, but five Commission members were indirectly involved in a number of completed land transactions and one ongoing transaction.

- One Commission member, who served from August 1991 through August 1993, was the Adams County tax assessor. The tax assessor's office was contacted during the negotiations with landowners for tax records that were used in land appraisals and for other transaction documents. The Park completed four land transactions from August 1991 through August 1993.
- An engineering firm owned by one Commission member (who served until August 1993) prepared a plan to subdivide a property 2 years after he left the Commission. The property was not subdivided, and the Park subsequently acquired this property in May 1998.

- Two Commission members provided comments on the Park's September 1990 land exchange with Gettysburg College when the House Committee on Government Operations held hearings about the exchange on May 9, 1994. At the hearing, the then Commission Chairman endorsed one of the alternatives proposed by the Park to remedy actions taken by Gettysburg College after the land exchange. Another Commission member, in his capacity as a Pennsylvania State official, provided comments also endorsing the same alternative.
- A current Commission member was involved in a land transaction, but not with the Park. This member sold an "historic and preservation easement" on his 135-acre farm to the Friends of the National Parks at Gettysburg in June 1997. The Friends acquired this property with the intention of donating the easement to the Park as soon as possible. The Park has started the process of accepting this donation but has not established a schedule for completing it. This property was designated as a high priority for acquisition in the Park's October 1993 Land Protection Plan, which identified lands the Park intended to acquire within the Park's boundary.

7. What is the nature of the relationship between the Gettysburg National Military Park and the Friends of the National Parks at Gettysburg?

The Friends of the National Parks at Gettysburg, Inc. (the Friends), incorporated in 1989 as a Pennsylvania nonprofit corporation, is a support group for the Park and the Eisenhower National Historic Site.⁹ As such, its stated mission is "to support, protect, and enhance, on behalf of all generations of American people, the resources associated with the National Parks at Gettysburg, the Battle of Gettysburg, and the Eisenhower Farm." According to the Friends' annual reports and articles of incorporation, the organization supports the parks at Gettysburg through

- preserving and protecting the lands inside the Park from development through land purchases and through the placement of historic and preservation easements;¹⁰
- protecting historic structures and landscapes by volunteering time and raising funds for the repair and maintenance of monuments, cannon carriages, landscapes, and structures;
- supporting the establishment of the most complete Civil War museum in the United States through the expansion of the National Civil War Museum at Gettysburg;
- educating its members and the general public by promoting the enhancement of educational resources and programs surrounding the Battle of Gettysburg and surrounding sites; and
- engaging in an ongoing partnership with the National Park Service, associated organizations holding interest in the Park, and the community through national conferences and regional and local events.

⁹This was the weekend retreat and retirement home of President Dwight D. Eisenhower, which is adjacent to the Park. The property was deeded to the National Park Service in 1967 and is administered by the Park Superintendent.

¹⁰Land purchases are through a "fee purchase," which is the outright purchase of all rights and interests in the land. An historic and preservation easement comprises the development and historic/archeological rights belonging to a tract of land. The owner of the land negotiates the easement's requirements and receives the fair market value of the easement.

Under memorandums of agreement dating back to 1990, the Friends and the Park have agreed that the Friends will provide general support, conduct philanthropic activities, and perform other private volunteer activities and initiatives intended to benefit and be undertaken on behalf of the Park and the Eisenhower site. The memorandums of agreement, among other things, set forth the responsibilities of the parties to the agreement, the activities requiring the Park's approval, other Friends activities not requiring the Park's approval, reports required to be filed by the Friends, and the terms of the agreement. The current memorandum of agreement, dated in 1997, is supplemented by a detailed operating plan for the Friends' solicitation of moneys using collection boxes located in several public areas of the Park.

8. How often has the Friends of the National Parks at Gettysburg used the Gettysburg National Military Park for fund-raising activities, how much money was raised at these events, and what types of projects were funded with the proceeds of such fund-raising? Was any of the money raised used for lobbying activities and, if so, are such activities legal?

According to the special-use permit files maintained by the Park, the Friends used the Park nine times for various activities from fiscal year 1995 through 1999. In four of these nine instances, the Friends conducted fund-raising activities for the "March for the Parks." In the remaining five instances, the Friends did not raise funds but used the Park for activities such as the educational portion of its annual meetings, living history demonstrations, or a press conference to receive donated funds from a public utility.¹¹ From 1994 through 1999, the March for the Parks events at Gettysburg raised a total of about \$26,000. According to the Friends, moneys collected at the marches have been used to restore a seasonal display for the Eisenhower Farm, help pay for moving utility lines in the Park, acquire lands, and restore cannon carriages.

Besides using the Park for fund-raising through special-use permits, the Friends maintains two "limber" (donation collection) boxes in two public areas of the Park. As part of its memorandum of agreement with the Park, the Friends must maintain these donations and the interest earned on these moneys in a separate bank account, collect the funds from the boxes on a specified schedule in the presence of a designated Park employee, and provide the Park with quarterly status reports on the deposits to, and expenditures from, the separate account. All moneys from these limber boxes are to be used solely for the benefit of projects and activities jointly selected by the Park and the Friends. Annually, the Park Superintendent and the Friends identify and agree on a list of projects that will be funded.

During fiscal years 1993 through 1999, limber box collections totaled about \$187,000 and generated about \$7,000 in interest. During that same period, the Friends expended about \$162,000 for projects such as cleaning, repairing, and refurbishing monuments; repairing historic fences; replacing trees in the national cemetery; repairing cannon carriages; performing sword conservation; acquiring archeological reference materials; obtaining topographic surveys; reproducing maps and photographs; producing educational videos; and developing an historic orchard management plan. At the end of fiscal year 1999, the limber box fund had a balance of about \$32,000.

¹¹The permit for the press conference was actually obtained by the public utility, but the Friends participated in the press conference.

To determine whether any of the limber box collections and March for the Parks funds had been used for lobbying activities,¹² we reviewed the Friends' audited financial statements for fiscal years 1994 through 1998,¹³ which were included in the Friends' annual reports, as well as supplemental schedules provided by the Friends. The financial statements and supplemental schedules do not suggest that moneys from the limber boxes were used for lobbying expenses.

According to Friends officials, the funds raised during the March for the Parks are considered Board-designated funds rather than restricted funds and are included with the organization's unrestricted funds. However, during the budgeting process, the Board identifies certain projects to be completed with certain funds, and these projects and funds become Board designated. Because the March moneys are not in a separate bank account, as are the limber box collections, and because they are included with the unrestricted funds, the audited financial statements do not clearly present the disposition of these funds. However, according to Friends officials, no March moneys were used for lobbying expenses and all March moneys were applied to Board-designated projects. To do otherwise, according to the officials, would be a violation of the Board's direction.

9. Have organizations other than the Friends of the National Parks at Gettysburg requested and submitted special-use permit applications to use the Gettysburg National Military Park for fund-raising activities? If so, what type of organizations made these requests, did the Park approve these requests, and if the Park disapproved the requests, what were the reasons?

According to Park personnel, the Park receives about 100 to 150 requests for use annually, but a significant number—about 40 to 60—of these requests relate to ceremonial activities for Remembrance Day, held in mid-November to commemorate the anniversary of President Lincoln's Gettysburg Address. According to information in the Park's special-use permit files, the majority of the requests for special-use permits were not for fund-raising but for other events, such as laying wreaths; rededicating monuments; holding memorial services for soldiers lost in the war, marriage ceremonies, Boy/Girl Scout demonstrations or award ceremonies, or reenlistment ceremonies; scattering ashes; conducting worship and sunrise services; holding horse rides and reenactments; and filming Public Broadcasting and other documentaries. The U.S. Postal Service also received a few special-use permits for first-day postage stamp cancellations and sales of Civil War postal memorabilia.

Special-use permits that were issued for fund-raising events generally related to "walk-a-thons" or "bike-a-thons." Groups requesting these permits (generally on an annual basis) include local affiliates of the March of Dimes, Multiple Sclerosis Society, Cystic Fibrosis Foundation, Gettysburg Young Women's Christian Association, Friends of the National Parks at Gettysburg, Adams County Society for Prevention of Cruelty to Animals, and Longstreet Memorial. Other, more sporadic requests came from the Crisis Pregnancy Center of Adams County, Adams County Chamber of Commerce, York Road Runners Club, Gettysburg Lutheran Seminary, South Central Community Action Programs, Rotary Club of Gettysburg, Leukemia Society, American Lung Association, and American Heart Association.

¹²For this report, we defined lobbying as any activity by the Friends, including individuals, that is designed to influence congressional action on specific legislation.

¹³At the time of our review, the fiscal year 1999 audited statement had not been completed and published in the Friends' annual report.

According to Park personnel, very few requests for special-use permits are denied. In some instances, they said, special-use permits are denied because the proposed uses are not in keeping with the intent of the Park or the organization seeking the permit will not agree to the limitations that the Park would impose on the organization's use of the Park. Our review of the special-use permit files disclosed 12 instances in which the Park denied requests for special-use permits from fiscal years 1995 through 1999. Of the 12 special-use permits denied during this period, only 2—for a motorcycle ride and a college sorority gathering—were for fund-raising events.

The Park's reasons for denying special-use permits included the following: Antique automobile parking did not fit with the nature of the Park; motorcycle rides did not contribute to visitors' understanding of the Park; dates did not correspond to the dates of special historic and/or commemorative significance; the location requested for a private ceremony could not be set aside without denying too many other people the chance to visit the most popular parts of the battlefield; the request posed resource protection and visitor safety concerns; new bike-a-thons and walk-a-thons are being discouraged because they do not meet with the intent of the Park; and flying over the Park in a helium balloon to take aerial photographs would disrupt visitors' normal use. Two of these denials involved requests by Civil War organizations, but neither was a fund-raising activity:

- One permit was submitted by the 2nd Maryland Co. A CSA Reactivated Infantry Company. This request was denied because the individual wanted to take horses off the horse trail, which is not allowed by the Park.
- The other permit was submitted by the 1st Battalion, 107th Field Artillery, and was denied because it involved taking weapons into the cemetery, a prohibited activity, and included a 21-gun salute, which would have been disruptive to other visitors.

Objectives, Scope, and Methodology

To provide information about the Park and the Commission, we primarily focused on events between the Park and the Commission that took place from 1990, when the Commission was created, through 1999. We reviewed files maintained by the Park relating to the nomination and appointment of all individuals appointed to the Commission. We also reviewed available files maintained by the National Park Service's Office of Policy on the nomination and appointment of individual Commission members. We reviewed and obtained copies of the minutes of all Commission meetings that were held and information relating to the public announcement of those meetings. We also reviewed the land transaction files maintained by the Park for each of the 20 land transactions. Finally, we spoke with Park and Commission officials about issues relating to each of the questions on the relationship between the Commission and the Park.

To provide information about the Park and the Friends, we primarily focused on events from 1994 through 1999; however, financial data were available, in most cases, only up to 1998. We reviewed the Friends' annual reports and financial statements. We obtained information on land transactions involving the Friends. We also reviewed files maintained by the Park for fiscal years 1995 through 1999 on special-use permits. Finally, we discussed the relationship between the Park and the Friends with key officials of the Friends.

Agency Comments

We provided copies of a draft of this report to the Department of the Interior and to the National Park Service for review and comment. The National Park Service commented that the draft report is an accurate reflection of the relationship between Gettysburg National Military Park and the Gettysburg National Military Park Advisory Commission and the Friends of the National Parks at Gettysburg, Inc. They also provided a technical clarification that was incorporated. The Department of the Interior did not comment on the draft report.

We are sending copies of this report to the Honorable Carlos Romero-Barcelo, Ranking Minority Member, Subcommittee on National Parks and Public Lands; appropriate congressional committees; the Honorable Bruce Babbitt, Secretary of the Interior; and the Honorable Robert Stanton, Director, National Park Service. We will also make copies available to others upon request.

We conducted our work from August 1999 through November 1999 in accordance with generally accepted government auditing standards.

If you or your staff have any questions about this letter, please call me on (202) 512-3841. Key contributors to this letter were June Foster, Linda Harmon, and John Kalmar, Jr.

Sincerely yours,



Barry T. Hill
Associate Director, Energy,
Resources, and Science Issues

**Information on the Nomination and Appointment Process
for Gettysburg National Military Park Advisory Commission Members**

The Gettysburg National Military Park (the Park) has prepared guidelines to implement the nomination and appointment process for members of the Gettysburg National Military Park Advisory Commission (the Commission). The process varies depending on what locality or what position the Commission member is representing. According to the Park's guidelines, for the nominees from the four surrounding townships, the Borough of Gettysburg, and the Adams County government, the Park drafts a letter for the Secretary of the Interior to send to each municipality requesting the names of two nominees for each position (for the Adams County representative only one nomination is requested). The draft letter from the Park goes through the National Park Service's Office of Policy and is forwarded to the Secretary of the Interior's office. The municipalities are requested to respond directly to the Secretary's Office, which they do, but they also notify the Park. Once the nominees are known, the Park sends the names to the National Park Service's Office of Policy. The National Park Service's Office of Policy then prepares a memorandum to the Secretary of the Interior with the names of the nominees, and after consideration, the Secretary makes the appointment. A letter is then sent to inform the nominee of his or her appointment.

For the representative from the Pennsylvania State Historic Preservation Office, the Park drafts a letter for the Secretary of the Interior to send to the Pennsylvania State Historic Preservation Office requesting a nominee. The draft letter from the Park goes through the National Park Service's Office of Policy and is forwarded to the Secretary of the Interior's office. The Pennsylvania State Historic Preservation Office is requested to respond directly to the Secretary's office, which it does, but it also notifies the Park. Once the nominee is known, the Park sends the name to the National Park Service's Office of Policy. The National Park Service's Office of Policy then prepares a memorandum to the Secretary of the Interior with the nominee's name, and after consideration, the Secretary makes the appointment. A letter is then sent to inform the nominee of his or her appointment.

For the two Adams County residents and the member with expertise in local historic preservation, the Park advertises the positions to the public through a press release. Interested individuals are asked to respond to the Park with a biography. Once the nominees are known, the Park sends the names of all the nominees to the National Park Service's Office of Policy with recommendations for the appointments. The National Park Service's Office of Policy prepares a memorandum to the Secretary of the Interior with the names of the nominees and the recommendations. After consideration, the Secretary makes the appointments, and a letter is sent to inform each nominee of his or her appointment.

(141370)