

Congress of the United States

Washington, DC 20515

November 7, 2025

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Secretary Burgum:

The Department of the Interior's (DOI) plan to conduct mass firings within the National Park Service (NPS) is unacceptable, unlawful, and an undeniable threat to the operations of park units throughout Massachusetts. Since the second Trump administration began, NPS staff departures and ongoing shutdown-related furloughs have imperiled the stewardship and long-term survival of our parks, natural heritage, historic sites, and cultural resources. Profoundly harmful economic consequences for the communities that support and depend on our parks are inevitable. We urge you to follow the law, protect our natural and cultural assets, and stop this attack on Massachusetts NPS employees.

On October 20, 2025, DOI disclosed its plan to eliminate 63 positions within the NPS Northeast Regional Office through a federal court filing. The court has preliminarily enjoined DOI from proceeding with those and other Reductions in Force (RIFs), and DOI has advised the court that it is complying with the order.¹ The court order notwithstanding, doing away with these 63 positions would undermine or eliminate services provided by the Northeast Regional Office, which plays an essential role in safeguarding the ecological and cultural integrity of 83 parks throughout New England and across 13 states. Its staff support a range of functions that individual park units cannot perform alone, including:

- natural resource management for the Boston Harbor Islands, which currently has no dedicated natural resource staff;
- coordination of invasive species management, coastal bird studies, and regional inventory and monitoring networks;
- oversight of land transfers, environmental impact reviews, and conservation partnerships with the Commonwealth of Massachusetts;
- research collaboration support with universities; and

¹ *American Federation of Gov't Employees v. U.S. Office of Management and Budget*, No. 3:25-cv-08302-SI (N.D. Cal. Oct. 20, 2025) (Second Supp. Decl. of Rachel Borra, Appendix A at 16); *id.* (N.D. Cal. Oct. 28, 2025) (order granting preliminary injunction and enjoining shutdown-related reductions in force); *id.* (N.D. Cal. Nov. 4, 2025) (Decl. of Rachel Borra Pursuant to Preliminary Injunction); see Josh Gerstein et al., *Judge extends order barring mass firings of federal workers during shutdown*, Politico (Oct. 28, 2025), <https://www.politico.com/news/2025/10/28/government-shutdown-federal-workers-rifs-ruling-00626042>.

- archeological resource preservation, protection, and compliance with federal law under the Archeological Resources Protection Act (ARPA) and the National Historic Preservation Act (NHPA).

Even before the loss of employees that began in January 2025, the Northeast Regional Office was understaffed and overtaxed.

The proposed RIFs would bring the Northeast Regional Office to the breaking point. For example, the Northeast Regional Office's archeology program has only 50 percent of its positions filled but faces a 15-percent annual increase in compliance workload. The Office cannot contract for—or defer—archaeological reviews without violating federal mandates. Too few archeologists on staff can mean legal exposure for non-compliance with ARPA or delayed construction, restoration, and maintenance projects ahead of America 250—the celebration of the nation's semiquincentennial—next year.

Likewise, the Northeast Museum Services Center (NMSC) in Charlestown, MA, which helps maintain irreplaceable collections and materials, could also be at risk from your mass firing plan. According to NPS experts, Massachusetts national parks have 1.4 million museum objects and 3,200 linear feet of archives. Further staff reductions at the NMSC would leave a critical gap in museum and collection care capacity, one that no individual park unit in the region could reasonably be expected to fill alone.

Additionally, we are concerned about possible staff reductions or downsizing at the Olmstead Center for Landscape Preservation in Brookline, Massachusetts and the Historic Architecture, Conservation and Engineering Center in Lowell, Massachusetts, both of which provide critical planning and historic restoration and renovation at many parks in the state and the Northeast. Through these centers, the Northeast Region pools skilled staff in carpentry, masonry, plumbing, electrical work, trail work, and other specialized trades—because each NPS park cannot staff every trade. These teams can then be dispatched to parks that don't have the in-house expertise or staff capacity to take on urgent or complex projects. Many of these staff have unique skills that cannot be outsourced.

Since President Trump's second inauguration, the NPS has lost a quarter of its permanent staff; at the start of this past summer, around 45 percent of seasonal positions were vacant. The National Parks of Boston had a combined 50 vacancies for full-time employees across its three park units as of July 2025, and one-third of the positions at the Cape Cod National Seashore are currently vacant.² These staff shortages mean that maintenance, search and rescue, medical and enforcement services, and basic visitor services are increasingly unavailable.³ For the many park units in Massachusetts that are historical sites, the lack of NPS interpreters and rangers prevents visitors from fully experiencing all the parks have to offer. The government-wide hiring freeze

² Tyler Jager, *Nearly a Third of Seashore's Jobs Are Vacant*, Providence Independent (Sept. 24, 2025), <https://provincetownindependent.org/local-journalism-project/2025/09/24/nearly-a-third-of-seashores-jobs-are-vacant/>.

³ Press Release, National Parks Conservation Ass'n, Staffing Crisis at National Parks Reaches Breaking Point, New Data Shows 24% Decline in Permanent Workforce (July 3, 2025), <https://www.npca.org/articles/9551-staffing-crisis-at-national-parks-reaches-breaking-point-new-data-shows-24>.

means that vacancies are filled only with internal DOI transfers, leaving empty positions elsewhere within DOI, a problem that will be compounded if you proceed with the mass firings.

For the remaining staff, your decision to keep parks open during the ongoing shutdown is already exacerbating staffing issues and forcing many park units in Massachusetts to function without adequate personnel or fee collection, draining previously collected visitor fee reserves. At parks throughout the Commonwealth, rangers and maintenance staff are stretched beyond capacity to maintain basic visitor safety and resource protection. Insufficient staffing can result in a rise in looting of nationally significant resources from Revolutionary War battlefield parks. It is therefore not surprising that former park employees and superintendents have urged you to close NPS sites during the shutdown rather than expose them degradation and harm.⁴

The proposed NPS RIFs fly in the face of your own Secretary's Order governing the NPS and underlying statutory authority. Secretarial Order No. 3426, which you signed on April 3, 2025, provides that it is "intended to ensure that all national parks and national historic sites, which are managed by [DOI], remain open and accessible for the benefit and enjoyment of the American people and to ensure that the National Park Service . . . will provide the best customer service experience for all visitors."⁵ And the Secretary's Order itself expressly recognizes the NPS's statutory mission under the Organic Act of 1916, "to conserve the scenery, natural and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."⁶ Decimating the NPS staff will only ensure that it is unable to fulfill these goals, which have long enjoyed bipartisan support.

To help us better understand how DOI's mass firing plan would comply with these authorities and to ensure that DOI is accountable to the people of Massachusetts, we request a written response to the following questions and a meeting with your staff on these issues by no later than November 21, 2025:

1. What analysis or criteria did DOI use to justify its plan to eliminate the 63 positions in the Northeast Regional Office?
2. Please identify the positions DOI is proposing to eliminate, including the job responsibilities and employing offices.
3. Are there additional NPS positions that DOI is proposing to eliminate within Massachusetts? If yes, please identify the positions, including the job responsibilities and employing offices.
4. Please provide updated staffing data for all the NPS units and offices within Massachusetts, including the number of vacant positions at each unit and office and length of each vacancy.

⁴ Rachel Frazin, *Hundreds of former NPS staffers say parks should close during shutdown*, The Hill (Oct. 23, 2025), <https://thehill.com/policy/energy-environment/5569986-nps-national-park-service-close-government-shutdown/>.

⁵ SO 3426, Ensuring National Parks are Open and Accessible, Dep't of Interior (Apr. 3, 2025), <https://www.doi.gov/document-library/secretary-order/so-3426-ensuring-national-parks-are-open-and-accessible>.

⁶ 54 U.S.C. § 100101 *et seq.*

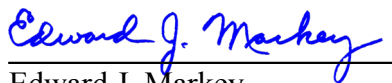
5. If the regional offices are closed, please describe how DOI will maintain support for Massachusetts park units.
6. Has DOI assessed how vacancies, reductions-in-force, and forced early retirements will negatively affect NPS expertise in museum conservation, natural resource management, and environmental review? If so, please provide that assessment. If not, why not?
7. Has DOI assessed how vacancies, reductions-in-force, and forced early retirements, particularly those in regional offices, will result in legal compliance issues and project delays? If so, please provide this assessment. If not, why not?
8. With existing vacancies, ongoing furloughs, and proposed staff firings, how will DOI meet its statutory and regulatory obligations under the Endangered Species Act, the Land and Water Conservation Fund Act, and other relevant laws?
9. Are any projects in the 13 states covered by the Northeast Regional Office, as well as any projects associated with America 250 celebrations, delayed due to staffing shortages? If so, please identify them. Please also provide quarterly reports on compliance timeliness and pending reviews for all projects.
10. Will the Department commit to pausing any firings or closures until a full assessment of their impacts on park operations, cultural resource protection, and visitor safety is completed and shared with Congress? If not, why not?
11. Is DOI requiring NPS staff to sign non-disclosure agreements (NDAs) to prevent them from sharing information on staffing issues? If so, please provide a copy of the NDA and any legal justification for its issuance.

Massachusetts parks tell the story of our nation's founding and provide immeasurable joy to families from the Commonwealth and beyond. In 2024, 8.8 million visitors to Massachusetts national parks spent \$950 million in the state, contributing a total of \$1.4 billion to the Massachusetts economy.⁷ Our NPS units not only preserve our natural and cultural heritage, they serve as an economic engine. Massachusetts deserves a fully supported and staffed NPS, especially as we celebrate America's 250th birthday next year.

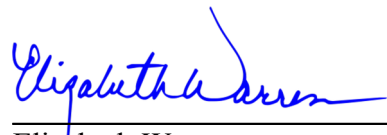
Irrespective of the eventual outcome of the federal court litigation, we urge you to immediately rescind the proposed firings, maintain the expertise embedded in the Northeast Regional Office and NPS assets in Massachusetts, and protect the employees working to preserve our national treasures for generations to come. We look forward to your response to these pressing questions and meeting with your staff.

Sincerely,

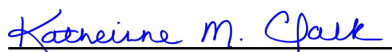
⁷ Seth Jacobsen, *How much did national parks in MA contribute to the economy? Here's what to know*, WickedLocal.com (Sept. 30, 2025), <https://www.wickedlocal.com/story/news/2025/09/30/national-parks-in-massachusetts-help-sustain-economy-what-to-know/86415857007/>.



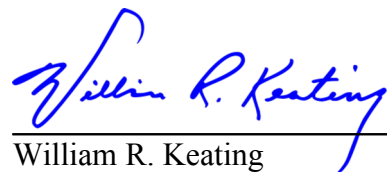
Edward J. Markey
United States Senator



Elizabeth Warren
United States Senator



Katherine M. Clark
Member of Congress



William R. Keating
Member of Congress



Stephen F. Lynch
Member of Congress



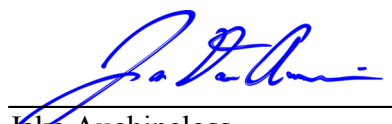
Seth Moulton
Member of Congress



Ayanna Pressley
Member of Congress



James P. McGovern
Member of Congress



Jake Auchincloss
Member of Congress



Lori Trahan
Member of Congress



Richard E. Neal
Member of Congress