



OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

# **OPERATION AND MANAGEMENT OF THE BRINKERHOFF LODGE AT GRAND TETON NATIONAL PARK**



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**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

SEP 30 2015

Memorandum

To: Jonathan B. Jarvis  
Director, National Park Service

From: Mary L. Kendall   
Deputy Inspector General

Subject: Final Evaluation Report – Operation and Management of the Brinkerhoff Lodge  
at Grand Teton National Park  
Report No. 2015-WR-019

This memorandum transmits the findings of our evaluation of the National Park Service's (NPS) operation and management of the Brinkerhoff Lodge (Lodge) at Grand Teton National Park (Park). While we found a number of areas for NPS to improve its operation and management of the Lodge, we identified other issues that require NPS' immediate attention before matters of operation and management can be addressed: guest safety, asset security, and Lodge preservation.

NPS has not assessed the safety of guests staying at the Lodge with regards to applicable fire code. In addition, there is no documented asset security and protection plan specific to the Lodge. Further, the Park has not documented that the current use of the Lodge contributes to its preservation. We offer four recommendations that, if implemented, will help NPS to determine the safest and best use for this historic structure. We offer an additional five recommendations that will help improve operation and management of the Lodge if, through implementation of the recommendations regarding safety, security, and preservation, NPS determines that the Lodge's current use is the best use. These recommendations focus on policy enforcement, record keeping, billing, and lodging rate.

In its September 15, 2015 response to our draft report, NPS concurs with Recommendations 1 – 3 and 5 – 9, providing the actions it plans to take (or has taken) to resolve them, as well as the target dates and officials responsible for implementation. We consider Recommendations 1 and 2 to be resolved and implemented, and Recommendations 3, 5, 6, 7, 8, and 9 to be resolved and unimplemented. NPS partially concurs with Recommendation 4. Instead of completing a Historic Structure Report, the Park is pursuing an alternative by preparing a Historic Properties Management Plan and Environmental Assessment to analyze the best current and potential use for its eligible buildings. As NPS agrees with the importance of Recommendation 4 and wants to seek an alternative resolution, we consider this recommendation to be resolved and unimplemented. It is crucial, however, that NPS addresses all of our concerns identified in Recommendation 4 before NPS proceeds with its plans to reopen the Lodge for overnight stays associated with official duty travel after June 2016. We will refer

the recommendations to the Assistant Secretary for Policy, Management and Budget for implementation tracking.

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented. If you have any questions regarding this memorandum or the subject report, please contact me at 202-208-5745.

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## Results in Brief

The Brinkerhoff Lodge (Lodge) is a historic structure located within the boundaries of the Grand Teton National Park (Park) in Wyoming. We evaluated National Park Service's (NPS) operation and management of the Lodge to determine whether NPS policy is reasonable, complete, and appropriately administered; whether the U.S. Government is owed money; and whether NPS could put Government assets to better use.

While evaluating NPS' operation and management of the Lodge, we found that guest safety had not been properly assessed, and the Lodge does not meet Federal safety and fire requirements. Furthermore, the Park had not assessed the Lodge's security. We issued two Notices of Potential Findings and Recommendations to the Park regarding guest safety and asset security concerns, and the Park concurred that it should conduct an assessment of the Lodge. The assessment was completed in May 2015, and the Park will communicate the results in a report and plan that is estimated for completion by June 30, 2015. The Park will also continue its moratorium of all Lodge overnight use until it has "addressed any immediate life safety concerns and imminent physical security threats." In addition to the safety and security concerns, we also found that the Park has not performed a historic structure report, which determines how best to use and preserve the historic structure and its furnishings.

A 1992 secretarial policy governs the use of the Lodge, but Park management is not enforcing it. The policy regarding eligible stays is not only going unenforced, it has been relaxed over the years. For example, the initial 1992 secretarial policy made it clear that only Federal employees on official duty could use the Lodge. Subsequent Park memoranda, however, have expanded it to include any person who meets criteria for official use, whether or not they are a Federal employee, on or off duty. The official use criteria, however, has never been clearly defined. In addition, Park records of guest visits vary and are inconsistent in detail, despite the 1992 secretarial policy to retain records to ensure that the Lodge is used only for official business. Guest billing guidelines are provided in the current Park memorandum, but billing rarely occurs. Even if the Park billed every guest, the amount charged would not cover the cost of operating the Lodge.

Our report contains three recommendations to ensure the safety and security of the Lodge and its guests and one recommendation to determine the best use of the Government asset. We provide five additional recommendations to improve NPS' administration and management of the Lodge should NPS determine that the Lodge is safe and secure and that its use as a lodging facility is the best use of the Government asset.

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# Introduction

## Objective

The objective of our evaluation was to review the National Park Service's (NPS) operation and management of the Brinkerhoff Lodge (Lodge) at Grand Teton National Park (Park) in Wyoming to determine whether established policy is reasonable, complete, and appropriately administered; the U.S. Government is owed money; and whether NPS could put Government assets to better use. See Appendix 1 for the scope and methodology of this report.

## Background

### Lodge History

The Lodge was built in 1947 by Zachary Brinkerhoff and his son, Zachary, Jr. In 1955, NPS purchased the Brinkerhoffs' furnished lodge, as well as the caretaker's cabin and the Brinkerhoffs' boats. After NPS acquired the property, it was converted to a retreat for visiting dignitaries; past guests include Presidents Richard Nixon, Jimmy Carter, and George H. W. Bush. The Brinkerhoff property was entered into the National Register of Historic Places on April 23, 1990, and today maintains the original design, furnishings, and character as when it was built.<sup>1</sup>

The Lodge is appointed with historic furnishings by designer Thomas Molesworth (1890 – 1977), an American furniture designer who created a distinctly Western style of furniture and accessories (Figure 1). Historic furnishings can be considered either museum quality or reproductions. Museum-quality objects are original pieces that possess functional, aesthetic, and cultural value. According to the Park curator, the majority of the furnishings at the Lodge are considered museum quality, with only four pieces being reproductions.

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<sup>1</sup> The National Register of Historic Places is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, NPS' National Register of Historic Places is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.



Figure 1. The Lodge's living area, featuring Thomas Molesworth furniture. Source: The Park

### **Current Use and Policies**

The Lodge is currently used as lodging and meeting space for those visiting the Park on official NPS business and is no longer used exclusively for visiting dignitaries. The Lodge's use changed in February 1992, when Manuel Lujan Jr., the Secretary of the Interior at that time, concluded that the public interest would be better served if the Lodge were used for official purposes only. Specifically, the 1992 secretarial policy required that the Lodge be used for NPS-sponsored training and official conferences for Federal employees, as well as housing Federal employees on temporary duty in the Park.

The Lodge's use was once described in Wikipedia as a vacation home. The page, however, was edited following the increased media coverage and public awareness surrounding the Lodge's use. The Park's public affairs officer instructed a staff member to change the Wikipedia page after NPS' Public Affairs Office in Washington, DC, suggested that the page be changed to reflect the Lodge's current use.

### **Operations and Expenses**

The Park's Facilities and Operations Department staff provide annual and routine maintenance to the Lodge. Annual maintenance includes opening the Lodge for its operating season and closing and winterizing it for the off season. Routine maintenance includes maintaining the outside property, paying for laundry services, and providing the caretakers with cleaning supplies. During its operating season, which runs from May through September, volunteer caretakers oversee

the Lodge's daily upkeep, including making the beds and cleaning and preparing the Lodge for new guests.

In addition, the superintendent's executive assistant provides scheduling and concierge services, and the Park curator inventories the museum-quality furnishings at the beginning and end of the season for the number and condition of the items.

During fiscal years 2010 through 2013, expenses for building and maintenance totaled more than \$43,000. Just over \$36,500 of the work was for a single item: replacement of interior plumbing and electrical systems. Within that same period, over \$263,000 was expended for capital improvements. Such improvements included staining the exterior, replacing the roof, restoring the interior, addressing safety issues, and refinishing plumbing fixtures in keeping with the historic integrity of the Lodge. Additional expenses include the Lodge's utilities.

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## Findings

While evaluating NPS' operation and management of the Lodge, we found safety issues that require NPS' immediate attention. Specifically, we learned that guest safety has not been properly assessed against applicable fire code requirements. In addition, we found that the Park has no asset security and protection plan in place for the Lodge.

We also found that the Park has not performed historic structure or historic furnishings reports to identify the Lodge's ultimate treatment and use. Further, NPS has not formally authorized the Lodge's historic furnishings for use, despite the fact that its current use may contribute to a quicker deterioration of these furnishings.

We found a number of areas in which the Park can improve its operation of the Lodge, including policy enforcement, recordkeeping, guest billing, and lodging rate. Issues regarding safety, security, and preservation, however, need to be addressed first to determine the Lodge's best use.

### **The Lodge: Guest Safety and Asset Security**

Guest safety has not been properly assessed. NPS Director's Order #58, "Structural Fire Management," requires parks to complete a comprehensive Fire Protection Condition Assessment and to develop a Structural Fire Management Plan. Director's Order #58 identifies NPS as adopting National Fire Protection Association codes, standards, and recommended practices for fire prevention, protection, and life safety. It further states that NPS will adhere to the more stringent requirements where conflicts arise between applicable standards.

NPS Director's Order #36, "Housing Management," requires parks to comply with applicable local laws and regulations. Both Teton County and the U.S. General Services Administration have adopted the International Fire Code (IFC). The IFC requires a fire safety and evacuation plan, fire alarm systems and smoke alarms, an automatic sprinkler system, and illuminated exit signs for emergency conditions. Further, the Hotel and Motel Fire Safety Act of 1990 (Pub L. No 101-391) requires hard-wired, single-station smoke detectors to be installed in each guest room. The Act also prohibits federally funded meetings, conventions, conferences and training seminars held at noncertified places of public accommodation. In addition, Federal employees are required to stay in a fire-safe facility when commercial lodging is necessary.

According to the Park's chief ranger, there is a high risk for severe damage if the Lodge should catch fire. The risk is high because emergency response arrival times are at least 20 minutes—assuming someone is onsite to make the call—and water for fire suppression would have to be pumped from nearby Jackson Lake or from existing wells on the property, which are unreliable for structural fire

control. In case an emergency call needs to be placed, the Lodge and caretaker's cabin both have telephone landlines. Cellular phone reception in and near the Lodge, however, is weak.



Figure 2. The view of Jackson Lake from the Lodge's deck. The lake is a possible pump site in case of a structure fire. Source: The Park

The Park has no documented security and protection plan specific to the Lodge. Although there have been no reported incidents of fire, breaking and entering, theft, or vandalism at the Lodge, recent media coverage has increased awareness of the Lodge and its furnishings, which warrants Park action to ensure the Lodge and its contents are properly secured and protected.

The Lodge has no alarm or automated security alert system and is secured solely by locks on its entry doors. During the Lodge's operating season, the presence of onsite caretakers provides a level of security, especially when curiosity seekers drop by unexpectedly. During the winter season, however, no one is regularly onsite; the electricity and water to the Lodge and its adjacent caretaker's cabin are shut off, and the Lodge is winterized. Year-round, Park law enforcement officials patrol the access road outside the Lodge and make themselves available to the Lodge when needed.

We issued two Notices of Potential Findings and Recommendations (NPF) to the Park superintendent to share our concerns on guest safety and asset security. The Park superintendent stated his concurrence to recommendations made within both NPFs. In his response, the Park superintendent stated that a team of subject matter experts conducted an assessment in May 2015, which included life safety

issues and applicable fire code compliance as it applies to the habitability and use of the Lodge, and threat and vulnerability assessment of potential security risks to the Lodge itself as well as to the furniture and collections contained within the Lodge. The result of this assessment will be a report of findings as well as a plan to address any potential deficiencies. This report and plan will be completed by June 30, 2015. The Park superintendent further stated that the Park continues its moratorium of all overnight use of the Lodge until it has “addressed any immediate life safety concerns and imminent physical security threats.”

## Recommendations

We recommend that NPS:

1. Conduct an assessment of the Lodge’s habitability considering all applicable fire safety codes and obtain approval from the fire code official;
2. Conduct a security and protection assessment on the Lodge by qualified professionals; and
3. Develop and implement a security and protection plan to ensure the Lodge, its guests, and its contents are appropriately protected and secured.

## Lodge Preservation

The Park has not documented how the current use of the Lodge contributes to its preservation or identified cost effective and alternative uses, as required by Director’s Order #36 “Housing Management.” According to the NPS chief architect, such analysis and documentation is performed using a Historic Structure Report. Park superintendents typically initiate these reports following NPS Cultural Resource Management Guidelines to consider the historical background and context of the structure to identify its best treatment and use. Requirements and alternatives for treatment are also identified.

In addition, the Park has not performed a Historic Furnishings Report, which considers the preservation of the Lodge’s furnishings. Historic furnishings are handled by a curator at the national or park level, given staff availability. At the Park, the curator inventories the Lodge’s historic furnishings at the beginning and end of the season. The furnishings include museum-quality furnishings by designer Molesworth, as well as four reproduced pieces. In addition to the curator’s inventory, however, the Director’s Order on NPS Museum Collection Management requires an approved Historic Furnishings Report, which documents furnishings exhibited within their associated historic structures.

Further, we found no authorization for consumptive use of the Lodge’s furnishings. The NPS Museum Handbook provides detailed guidance on consumptive use, as such use may damage museum objects or make them deteriorate more quickly. Either the superintendent or regional director can authorize in writing the consumptive use of museum-quality objects. The requestor must justify the request for consumptive use by stating how the use will benefit the public, increase understanding and appreciation of cultural and natural heritage, or contribute significantly to heritage preservation and protection.

The Lodge’s historic furnishings are mentioned in its 1990 National Register of Historic Places nomination. If NPS determines that these furnishings contribute to the National Register eligibility and anything changes with the use or condition of the furnishings, then a special review would be triggered to determine whether the change in the condition of the furniture will have any effect on the Lodge’s status as a historic place.<sup>2</sup> The Advisory Council on Historic Preservation, which is an independent Federal agency, conducts these reviews. The Council encourages Federal agencies to factor historic preservation into Federal project requirements. In addition, the Council encourages agencies to allow it the opportunity to comment on such projects prior to the agency’s decision on them.

### **Recommendation**

We recommend that NPS:

4. Complete preservation and productive use requirements for the Lodge, which should, at a minimum, include—
  - completing a Historic Structure Report and Historic Furnishings Report;
  - determining whether furnishings are authorized for consumptive use; and
  - determining whether furnishings are subject to review in accordance to Section 106 of the National Historic Preservation Act of 1966.

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<sup>2</sup> Required by Section 106 of the National Historic Preservation Act of 1966.

## **The Lodge: Operation and Management**

We identified the following areas for the Park to improve its operation and management of the Lodge once the Park addresses guest safety, asset security, and Lodge preservation.

### **Policy Enforcement - Criteria for Eligible Stays**

The 1992 secretarial policy, which authorized only Federal employees use of the Lodge for training, official conferences, or temporary housing, is not being enforced. Since 1992, the Park superintendent has issued at least six other policy memoranda regarding the Lodge's use. These subsequent memoranda have relaxed eligibility requirements. For example, the current superintendent memorandum, issued in April 2012, allows for "off duty" Federal employee and non-Federal employee stays so long as they are related to and of benefit to the Park. Even with the relaxed requirements, the current policy still clearly states that the use of the Lodge is for "[NPS] official business only," but the official business or use requirement established in 1992 has never been clearly defined.

To meet the official use requirement, Park superintendents have created an hour-long briefing about the Park, which off-duty or non-Federal guests must attend. Since 2011, there have been 10 stays qualified by this hour-long briefing.

From 2011 to 2014, over 500 different people have visited the Lodge. These visitors include State officials, friends of the prior superintendent, host speakers, foundation officials, and family and friends of official visitors.

Over the course of 92 stays, most of which were overnight stays, 68 groups have visited the Lodge (see Appendix 2 for a list of those who have stayed overnight at the Lodge and Appendix 3 for a list of those who have used the Lodge for day use).<sup>3</sup>

Of these 68 groups, 43 listed a Federal employee as the primary guest. Such stays may include friends and family of a guest staying overnight (around 100 total individuals) or attendees of an NPS affiliated meeting, training, or conference (over 400 individuals). At this point, more than half of the stays during these years appears to be by NPS invitation or for vacations. More specifically, of the 92 total stays, about 60 had no clear official qualification, and of the 222 total nights of Lodge use, 114 did not involve official business. Figure 3 shows the number of stays that were for official duty or that had no official qualification.

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<sup>3</sup> A "stay" is defined as consecutive nights spent at the same location, regardless of check-in or check-out activity. A "group" is defined as an individual and his or her guests or an organization using the Lodge. In some cases, a group is a single individual. Only the primary guest in the group factors into the percentages. For example, the Grand Teton National Park Foundation uses the Lodge to host luncheons or dinners for 20 or more guests, but the Foundation is counted as a group. An individual Federal employee is also considered a group, whether or not he or she has family or guests.

Classification	Day Use	Overnight Use	Total
Official Duty	12	20	32
No clear official qualification for stay (classified as vacation or invitation)	14	46	60
<b>Total</b>	<b>26</b>	<b>66</b>	<b>92</b>

Figure 3. Types of stays by use: day use or night use and official duty or no clear qualification.

While current policy addresses how to make a reservation, the channels that must be cleared, and the information the requests must include, none of these criteria helped us to identify whether use of the Lodge was requested by a guest or offered by NPS. Our discussions with Park management revealed that invitations or requests were usually oral, not written, and invitations were issued at the prior superintendent’s discretion.

Recommendation
<p>We recommend that NPS:</p> <ol style="list-style-type: none"> <li>5. Establish and implement policy to clearly define official use eligibility.</li> </ol>

### Recordkeeping

NPS has not kept consistent, detailed guest lodging records. The 1992 secretarial policy directed NPS to keep records, including guest travel orders, to be sure that there was no misunderstanding that the Lodge was to be used for official functions. While archival documentation of Lodge guests dates back to 1957, the document type and content have varied over the years, with some years having no guest records at all:<sup>4</sup>

- From 1957 to 1966, records were kept using a handwritten guest log with names, dates, and addresses, as well as personal remarks made by the guests.
- From 1973 to 1983, and in 1985, records were kept in formal memoranda with similar reservation information as in 1957 through 1966. The amounts charged for each stay, if any, were first documented in 1978 and continued through all subsequent periods in which guest records were kept.

<sup>4</sup> NPS could not provide records for the years 1967 to 1972, 1984, and from 1986 to 2000.

- From 2001 to 2010, there was no formal log for records, and guest information was limited to names and amounts paid, which were gleaned from a listing of Lodge deposits we obtained from an NPS budget analyst.

We requested lodging information for the past 10 years but were only able to conduct analyses for the past 4 years. While NPS had other records prior to 2011, they were not sufficient to conduct a thorough analysis.

## Recommendations

We recommend that NPS:

6. Establish and implement policy and procedures as to how NPS will document Lodge guest information. Such information should include the Lodge's primary guest, the official use during his or her stay, whether additional persons accompanied the guest during his or her stay, and whether the stay combined official and personal uses; and
7. Establish and implement policy and procedures to identify when and how a waiver may be obtained for an individual or stay that would otherwise be considered ineligible.

## Guest Billing

The Park rarely bills guests, and billing usually occurs only when a guest requests one as a record for a travel voucher. Both the 2004 and 2012 memoranda from the Park superintendent detail billing guidelines. From 2011 to 2014, however, nearly 85 percent of the guests were not billed (see Appendix 4 for billing and revenue information). In other words, there were 186 nights at the Lodge for which the Park received no compensation, resulting in \$28,875 in lost revenues (see Appendix 5). This estimate is based on the prevailing Federal lodging rate per diem at the time of stay and an additional \$10 per person per night, per NPS policy.

During the 2011 to 2014 period, 11 payments were received for Lodge use, totaling just over \$7,143. Of these payments, four were billed or paid within 2 weeks of the guest's stay, and seven were billed or paid late—up to 40 months late. In some cases, donations were promised by guests. When we contacted the Park partners, however, only a single such donation was identified.<sup>5</sup> Figure 4 shows the number of nights stayed and the frequency with which they occurred.

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<sup>5</sup> Park partners include the Park Foundation, Grand Teton Association, the Teton Science School, and the Murie Center. These entities work with the Park on various programs and projects.

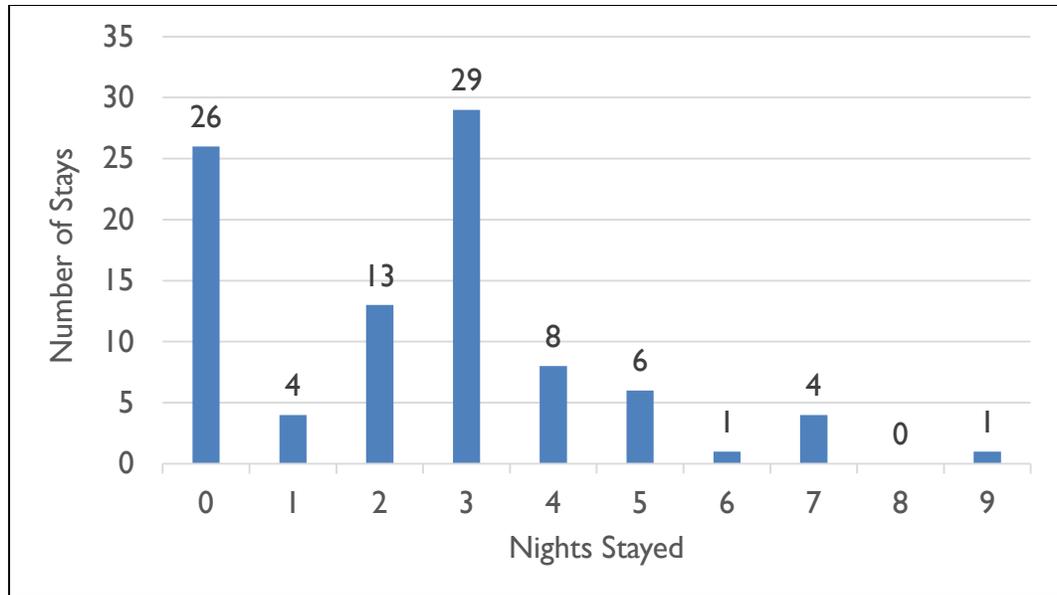


Figure 4. 2011-2014 stays. Number of stays at the Lodge and the number of nights per stay. A zero-night stay indicates day use only.

### Recommendation

We recommend that NPS:

- Review and update current policy to establish a system to bill and collect payment from Lodge guests and to determine what documentation is needed to authorize guests who are not billed according to policy.

### Lodging Rate

Even if all guests were charged the current Federal per diem rates, those revenues would not cover the cost of Lodge maintenance. The secretarial policy stated that rental rates were to be based on current Federal per diem rates. Over the years, the subsequent Park superintendent memoranda identified rental rates that varied from Federal lodging per diem rates, to other rates identified within a specific memorandum, to additional rates per bed used or per guest.

According to the secretarial policy, when reimbursement does not cover maintenance, the Park should use other funds. A 1982 OIG report recommended that the Park evaluate and update rental rates for the Lodge to better recoup costs. In 1992, NPS prepared a comparability study that recommended the rate charged to Lodge guests who are not on official Federal travel be increased from \$85 to \$170 per night. The study also recommended the rate charged for each additional person beyond two be increased from \$12 to \$50 per night. The Wort Hotel, the

Spring Creek Resort, and the Jenny Lake Lodge were among the locations identified as comparables to the Lodge in the study. The current rates for a July 2015 reservation at these locations are now \$665 per night at the Wort Hotel, \$2,620 per night at the Spring Creek Resort, and \$702 per night at the Jenny Lake Lodge. See Appendix 6 for a current comparability study.

The NPS chief historical architect told us that he was not aware of any similar types of lodgings that were exclusively used for senior officials and that were off limits to the public.

### **Recommendation**

We recommend that NPS:

9. Reevaluate the 1992 secretarial policy to determine whether the prevailing Federal per diem rate or market rate should apply, taking into consideration the costs to operate and maintain the Lodge.

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# Conclusion and Recommendations

## Conclusion

The National Register describes the Lodge as having “an exceptional significance because of the role it played as a vehicle to publicize [the Park] and as a representative of the forest lease vacation homes that once dotted the area.” The Lodge’s historic significance and value make it increasingly important for the Park not just to follow policy for use, but to ensure the safety of those who use the Lodge and that the Lodge is used and protected appropriately. Determining the Lodge’s best use and implementing proper security protocols will dictate the appropriate policies for use and prolong the life of the Lodge and its historic furnishings, thus preserving a piece of our Nation’s history.

Given the Lodge’s historical value, both in terms of its structure and its furnishings, and in light of the Lodge’s increased public visibility, NPS should address the following recommendations.

## Recommendations and Summary of NPS’ Response to our Draft Report

We recommend that the NPS Director:

1. Conduct an assessment of the Lodge’s habitability considering all applicable fire safety codes and obtain approval from the fire code official;
2. Conduct a security and protection assessment on the Lodge by qualified professionals;
3. Develop and implement a security and protection plan to ensure the Lodge, its guests, and its contents are appropriately protected and secured; and,
4. Complete preservation and productive use requirements for the Lodge, which should, at a minimum, include—
  - completing a Historic Structure Report and Historic Furnishings Report;
  - determining whether furnishings are authorized for consumptive use; and
  - determining whether furnishings are subject to review in accordance to Section 106 of the National Historic Preservation Act of 1966.

After completing these recommendations, if NPS determines the Lodge to be safe, secure, and its use as a lodging facility to be the best use of the Government asset, then we also recommend that the NPS Director:

5. Establish and implement policy to clearly define official use eligibility;
6. Establish and implement policy and procedures as to how NPS will document Lodge guest information. Such information should include the Lodge's primary guest, the official use during his or her stay, whether additional persons accompanied the guest during his or her stay, and whether the stay combined official and personal uses;
7. Establish and implement policy and procedures to identify when and how a waiver may be obtained for an individual or stay that would otherwise be considered ineligible;
8. Review and update current policy to establish a system to bill and collect payment from Lodge guests and to determine what documentation is needed to authorize guests who are not billed according to policy; and
9. Reevaluate the 1992 secretarial policy to determine whether the prevailing Federal per diem rate or market rate should apply, taking into consideration the costs to operate and maintain the Lodge.

In its September 15, 2015 response to our draft report, NPS concurs with Recommendations 1 – 3 and 5 – 9, providing the actions it plans to take (or has taken) to resolve them, as well as the target dates and officials responsible for implementation (see Appendix 7). We consider Recommendations 1 and 2 to be resolved and implemented, and Recommendations 3, 5, 6, 7, 8, and 9 to be resolved and unimplemented. NPS partially concurs with Recommendation 4. Instead of completing a Historic Structure Report, the Park is pursuing an alternative by preparing a Historic Properties Management Plan and Environmental Assessment to analyze the best current and potential use for its eligible buildings. As NPS agrees with the importance of Recommendation 4 and wants to seek an alternative resolution, we consider this recommendation to be resolved and unimplemented. It is crucial, however, that NPS addresses all of our concerns identified in Recommendation 4 before NPS proceeds with its plans to reopen the Lodge for overnight stays associated with official duty travel after June 2016. We will refer the recommendations to the Assistant Secretary for Policy, Management and Budget for implementation tracking. See Appendix 8 for a current status of each recommendation.

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# Appendix I: Scope and Methodology

## Scope

We evaluated the National Park Service's (NPS) operation and management of the Brinkerhoff Lodge (Lodge) at Grand Teton National Park (Park) focusing on addressing concerns put forth by the Congressional Committee on Natural Resources. Our objectives were to determine whether established policy is reasonable, complete, and appropriately administered; the U.S. Government is owed money; and Government assets could be put to better use. We conducted our evaluation from November 2014 to May 2015.

We did not survey outside of NPS to identify whether any similar types of lodgings existed that are exclusively used for senior officials and that were off limits to the public. In our discussion with the NPS chief historical architect, he was not aware of any such lodging.

We conducted our evaluation in accordance with the Quality Standards for Inspection and Evaluation as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions and recommendations.

## Methodology

To accomplish the evaluation, we—

- reviewed laws, regulations, and prior audit coverage;
- reviewed documents submitted by the Park, including a matrix of the past 4 years of Lodge overnight and day use, financial documents, emails supporting the reservation processes, caretaker's documents, and curator information;
- researched past guest and historical records;
- visited the Park; and
- visited the Lodge.

To gain a better understanding of the Lodge's operation and management, we contacted—

- Park officials, including the superintendent, deputy superintendent, administrative assistant to the superintendent, public affairs officer, operations and maintenance chief, museum curator, fee and revenue business manager, budget officer, and the former administrative assistant to the former superintendent;
- the Park's national park chief ranger;
- the NPS chief historical architect;
- the Advisory Council on Historic Preservation;

- former volunteer caretakers of the Lodge;
- the Grand Teton National Park Foundation;
- the Grand Teton Association;
- the Teton Science School; and
- the Murie Center.

## Appendix 2: Lodge Overnight Guests 2011 – 2014

The National Park Service (NPS) provided us with a list of Brinkerhoff Lodge (Lodge) overnight guests for 2011 to 2014. The deputy superintendent notated the list to identify whether he remembered stays to be official, by invitation, or a vacation. There is no clear definition, in policy or practice, as to what these types of stays entail. The deputy superintendent did tell us that a stay can be classified as official if, at minimum, the superintendent briefs the guest about Grand Teton National Park (Park). The superintendent told us that invitational stays are those guests whom the superintendent invites for meeting convenience or benefit to the Park. Vacation stays are those stays that do not qualify as either official or invitational. For those stays that were not notated and classified by the deputy superintendent, we used our professional judgment to classify the stays based on the above criteria. In total, we found that more than half of the stays that occurred from 2011 to 2014 were by NPS invitation or for vacations. The information NPS provided below is organized alphabetically. We added our determination of whether or not the primary guest was a Federal employee and how many days beyond official business a guest stayed.

### Key

- † Received a park briefing. No clear Park purpose qualification.
- Official Use (Business) Stay
- ! Invitational Stay
- V Vacation Stay

Name and Title of Primary Guest	Affiliation	Federal Employee (Y/N)	Arrival Date	Departure Date	Total Nights	Known Additional Guests	Trip Purpose	Type of Stay	Known Date(s) of Official Business
Jill Baum NPS & Student Conservation Association (SCA) Workgroup	NPS and SCA	Y	08/22/12	08/25/12	3	0	Evaluation of 2012 NPS Academy and planning for 2013 NPS Academy	!	August 23 – 24, 2012
† Joseph Biden Vice President of the United States	The White House and Secret Service Advance	Y	08/04/14	08/07/14	3	0	U.S. Secret Service: prepare and secure Lodge for the Vice President	○	August 4 – 7, 2014
			08/07/14	08/11/14	4	12	Family visit to Jackson Hole area	V	N/A
† Michael Connor Deputy Secretary	U.S. Department of the Interior	Y	08/12/14	08/13/14	1	3	Briefing on Park issues and orientation to Moose-Wilson Corridor; family visit to Jackson Hole area	V	August 12, 2014
Marina Connors Civil Engineer	New Zealand Parks- Intermountain Region (IMR) Detail and Facility Management	N	07/08/13	07/13/13	5	3	Park water and waste water system projects	!	July 9, 2013
Thomas Crum Author and Speaker	The Thomas Crum Approach	N	07/24/12	07/27/12	3	!	Invitational speaker regarding conflict resolution, peak performance, and stress management	!	July 25 – 26, 2012
Craig Crutchfield Chief of Interior Branch	Office of Management & Budget	Y	07/31/13	08/02/13	2	!	All day of briefings and site visits in the Park	V	August 1, 2013
			08/05/13	08/07/13	2	!	Return to and depart from Jackson Hole Airport	V	N/A

Name and Title of Primary Guest	Affiliation	Federal Employee (Y/N)	Arrival Date	Departure Date	Total Nights	Known Additional Guests	Trip Purpose	Type of Stay	Known Date(s) of Official Business
Katy Duffy NPS Employee; Author	Sponsored by the Grand Teton Association	Y	06/10/11	06/13/11	3	0	Co-author: update book for publication ("Short Hikes & Easy Trails in Grand Teton National Park")	I	June 10 – 12, 2011
† Arne Duncan Secretary of Education	U.S. Department of Education	Y	08/07/13	08/13/13	6	3	Park Briefing with Superintendent Scott regarding a memorandum of understanding with NPS and Department of Education; Official Event with Secretary Jewell near Riverton, Wyoming (day trip from Brinkerhoff)	V	August 8, 2013 August 11, 2013
Rodger Evans Chief of Design and Construction	Denver Service Center	Y	06/27/12	06/28/12	1	0	Meeting with contractors regarding new Moose Headquarters (HQ) building <sup>6</sup>	O	June 28, 2012
			07/23/12	07/26/12	3	0	Meeting regarding construction of Moose HQ	O	July 24 – 25, 2012
Jerry Frielich NPS Employee; Author	Sponsored by the Grand Teton Association	Y	06/10/11	06/13/11	3	0	Co-author: update book for publication ("Short Hikes & Easy Trails in Grand Teton National Park")	I	June 10 – 12, 2011
Britton Grey Fire Chief	Yellowstone National Park	Y	07/16/12	07/18/12	2	0	Inspect fire detection and suppression systems in the Park	O	July 17 – 18, 2012
Bill Hayden NPS Employee; Author	Sponsored by the Grand Teton Association	Y	06/10/11	06/13/11	3	0	Co-author: update book for publication ("Short Hikes & Easy Trails in Grand Teton National Park")	I	June 10 – 12, 2011
Jim Herdman Program Manager of Historic and Visitor Assets	Department of Conservation South Marlborough Area New Zealand Parks	N	09/05/11	09/09/11	4	0	International visitor learning NPS operations, visited the Western Center for Historic Preservation of Park	I	September 7 – 8, 2011
† Betsy Hildebrandt Chief of Staff	U.S. Fish & Wildlife Service	Y	08/27/11	08/29/11	2	3	Briefing with Park Superintendent Scott and Senior Wildlife Biologist Steve Cain	V	August 28, 2011
Tom Hopkins Engineer and Project Manager	New Zealand Parks-IMR Detail and Facility Management	N	07/08/13	07/13/13	5	3	Park water and waste water system projects	I	July 9, 2013
† Lisa Jackson Administrator	Environmental Protection Agency	Y	06/28/11	07/01/11	3	5	Family visit to Jackson Hole area, Park Superintendent Scott provided briefing on 6/28/11, and tour of the new air quality monitoring station at Teton Science School	V	June 28, 2011

<sup>6</sup> Moose HQ building is a reference to the Park HQ building, located in Moose, Wyoming.

Name and Title of Primary Guest	Affiliation	Federal Employee (Y/N)	Arrival Date	Departure Date	Total Nights	Known Additional Guests	Trip Purpose	Type of Stay	Known Date(s) of Official Business
† Jon Jarvis Director	NPS	Y	08/18/12	08/22/12	4	3	National Park Foundation Dinner: Wyoming Statelands Tour, briefing with the Park management team, and Park all employee meeting and ice cream social	V	August 21 – 22, 2012
Dr. Jennifer Jewiss Professor, The University of Vermont	NPS Conservation Study Institute	N	08/07/11	08/14/11	7	0	NPS Academy: survey and evaluation of 1st year of academy; focus groups with students	I	August 8 – 9, 2011
Barbara Johnson Division Chief	Denver Service Center	Y	07/18/11	07/21/11	3	0	Colter Bay Preferred Alternative Workshop	O	July 19 – 21, 2011
Luci Baines Johnson Chairman of the Board LBJ Asset Mgmt Partners	Youngest daughter of U.S. President Lyndon Johnson	N	07/31/14	08/03/14	3	1	Invitational Speaker to celebrate the 50th Anniversary of the Wilderness Act	I	July 31 – August 3, 2014
John Keck Montana and Wyoming State Coordinator Eastern WY Group Superintendent	NPS IMR Office	Y	08/28/13	08/31/13	3	1	Briefings and field trip to Wyoming Statelands Property and Moose Wilson Corridor	O	August 29, 2013
† Ray LaHood Secretary of Transportation	U.S. Department of Transportation	Y	08/03/12	08/12/12	9	6 (2 more guests not confirmed)	America's Outdoors Initiative Keynote Speaker for Phase II Multi-Use Pathway Celebration, met with State & local elected officials regarding unique transportation opportunities and needs of a National Park gateway community, and family visit to the Jackson Hole Area	V	August 9, 2012
Glenn Lamoree Brand Chief for Design and Construction	Denver Service Center	Y	06/25/12	06/28/12	3	0	Meetings with contractors regarding new Moose HQ Building	O	June 26 – 28, 2012
† Susanne Lewis Retired Yellowstone Superintendent	Sonoran Institute	N	06/13/12	06/18/12	5	1	Board of Director Meeting – Sonoran Institute	I	Unknown meeting dates
			8/24/14	8/26/14	2	1	Briefing with the Park Superintendent Vela and Deputy Superintendent Schneider	V	August 25, 2014

Name and Title of Primary Guest	Affiliation	Federal Employee (Y/N)	Arrival Date	Departure Date	Total Nights	Known Additional Guests	Trip Purpose	Type of Stay	Known Date(s) of Official Business
Donna Losson NPS and SCA Workgroup	NPS and SCA	Y	08/22/12	08/25/12	3	0	Evaluation of 2012 NPS Academy and planning for 2013 NPS Academy	I	August 23 – 24, 2012
† Sue Masica Regional Director	NPS IMR Office	Y	08/13/14	08/16/14	3	1	Briefings on Park issues (meetings and site visit)	O	August 14 – 15, 2014
Dr. Barbara Mueller Professor of Anthropology	Casper College	N	07/10/11	07/14/11	4	1	Invitational Speaker for the Park sponsored John Colter Day	I	July 11 and 13, 2011
			07/29/12	08/01/12	3	1	Invitational Speaker for the Park sponsored John Colter Day	I	July 30 – 31, 2012
			06/22/13	06/25/13	3	1	Invitational Speaker for the Park sponsored John Colter Day	I	June 24 – 25, 2013
			06/22/14	06/26/14	4	1	Invitational Speaker for the Park sponsored John Colter Day	I	June 23 – 24, 2014
Brian Nesvik Deputy Director	Wyoming Game & Fish	N	09/03/14	09/05/14	2	1	IMR and Park Meeting and Field Trip - inholdings, wolves, elk, grizzlies, mountain goats	I	September 4, 2014
Monica Norval Project Management	Denver Service Center	Y	06/25/12	06/28/12	3	0	Meeting with contractors regarding new Moose HQ Building	O	June 26 – 28, 2012
			07/23/12	07/26/12	3	0	Meeting regarding construction of Moose HQ	O	July 24 – 25, 2012
Garry Oye Chief	NPS Wilderness Stewardship Division	Y	07/17/11	07/22/11	5	0	Attend Colter Bay Preferred Alternative Workshop	O	July 19 – 22, 2011

Name and Title of Primary Guest	Affiliation	Federal Employee (Y/N)	Arrival Date	Departure Date	Total Nights	Known Additional Guests	Trip Purpose	Type of Stay	Known Date(s) of Official Business
Rob Parish Project Manager	Denver Service Center	Y	07/29/11	08/05/11	7	5	IMR oversight to new headquarters project in Moose and evaluation of 4 Lazy F Ranch	O	August 1 – 5, 2011
Dale Penny President of SCA	SCA	N	08/08/11	08/11/11	3	0	NPS Academy: survey and evaluation of 1st year of academy; focus groups with students	I	August 8 – 9, 2011
			06/18/14	06/21/14	3	3	Attend SCA Board of Directors meeting at Jackson Lake Lodge	I	June 18 – 22, 2014
Francis Leland "Lee" Pico Assistant U.S. Attorney	U.S. Attorney's Office District of Wyoming	Y	06/02/11	06/03/11	1	2	Represent Department of Justice in Federal Court	V	Unknown
			06/21/12	06/24/12	3	3	Represent Department of Justice in Federal Court	V	June 22, 2012
			07/11/12	07/13/12	2	3	Represent Department of Justice in Federal Court	V	July 12, 2012
			06/12/14	06/15/14	3	1	Represent Department of Justice in Federal Court	V	June 13, 2014
			07/18/14	07/22/14	4	2	Represent Department of Justice in Federal Court	V	July 21, 2014
Louis "Lollie" Plank Board Member	Sonoran Institute	N	06/13/12	06/18/12	5	0	Board of Directors Meeting- Sonoran Institute	I	Unknown meeting dates
Chris Reel Environmental Protection Specialist	NPS IMR Office	Y	08/14/11	08/18/11	4	1	Environmental Audit	O	August 15, 2011
Joey Ruehrwein SCA Program Manager Partnerships	SCA	N	08/08/11	08/11/11	3	0	NPS Academy: survey and evaluation of 1st year of academy; focus groups with students	I	August 8 – 9, 2011
Kenneth Salazar Secretary	DOI	Y	08/21/11	08/24/11	3	unknown	All employee meeting, media event, spoke with Park partners, and partner reception	V	August 23, 2011

Name and Title of Primary Guest	Affiliation	Federal Employee (Y/N)	Arrival Date	Departure Date	Total Nights	Known Additional Guests	Trip Purpose	Type of Stay	Known Date(s) of Official Business
Jay Satz NPS and SCA Workgroup	NPS and SCA	Y	08/08/11	08/11/11	3	0	NPS Academy: survey and evaluation of 1st year of academy; focus groups with students	I	August 8 – 9, 2011
			08/22/12	08/25/12	3	0	Evaluation of 2012 NPS Academy and planning for 2013 NPS Academy	I	August 23 – 24, 2012
† Phillip Schiliro Assistant to the President and Special Advisor	The White House	Y	08/18/11	08/21/11	3	2	Family visit to the Jackson Hole Area Official park briefing with Superintendent Scott	V	August 19, 2011
C. Bruce Sheaffer Comptroller	NPS	Y	06/07/11	06/09/11	2	0	Hosted (interns and staff) NPS Business Planning Institute at Jackson Lake Lodge	O	June 8 – 9, 2011
Kim Slininger Associate Regional Director of Facilities and Lands (Acting)	NPS Regional Office	Y	06/08/11	06/10/11	2	0	Federal Highway Meeting with Park Facility Management Division Chief	O	June 9 – 10, 2011
Dana Soehn NPS and SCA Workgroup	NPS and SCA	Y	08/22/12	08/25/12	3	0	Evaluation of 2012 NPS Academy and planning for 2013 NPS Academy	I	August 23 – 24, 2012
Scott Talbot Director	Wyoming Game & Fish	N	09/03/14	09/05/14	2	1	IMR and Park meeting and field trip - inholdings, wolves, elk, grizzlies, mountain goats	I	September 4, 2014
Marcus Thomas Architectural Intern	Denver Service Center	Y	07/18/11	07/21/11	3	0	Colter Bay Preferred Alternative Workshop	O	July 19 – 21, 2011
Bill Thompson Chief of Facility Management	Rocky Mountain National Park	Y	09/05/11	09/09/11	4	0	Accompany Jim Herdman from New Zealand Parks (see above)	O	September 7 – 8, 2011
Ray Todd Associate Regional Director of Facilities and Lands	NPS IMR Office	Y	07/19/13	07/21/13	2	2	Pathways and Moose Wilson Corridor and Gros Ventre Junction Meetings	O	July 19, 2013
Karen Wade Retired IMR Regional Director	Sonoran Institute	N	06/13/12	06/18/12	5	0	Board of Directors Meeting- Sonoran Institute	I	Unknown meeting dates

Name and Title of Primary Guest	Affiliation	Federal Employee (Y/N)	Arrival Date	Departure Date	Total Nights	Known Additional Guests	Trip Purpose	Type of Stay	Known Date(s) of Official Business
John Wessels Regional Director	NPS IMR Director	Y	07/01/11	07/08/11	7	3	Family visit to the Jackson Hole Area Field Tours and Briefings with Park management team, Mayor, NPCA Representative Jackson, and Hole Airport Board Dinner Grand Opening of new auditorium in the Park	V	July 6 – 7, 2011
			06/29/13	07/06/13	7	3	Family Visit to the Jackson Hole Area, meet with NPS academy students, all-employee social, Teton County Commissioners, and Orientation to Moose-Wilson Road, Vernon Celebration	V	July 2, 2013
Tammy Whittington Associate Regional Director of Resources, Stewardship and Regional Science Advisor	NPS IMR Office	Y	06/16/11	06/18/11	2	1	Tammy returning from Interagency Grizzly Bear Committee meeting in Yellowstone Dinner with Park Superintendent Scott	V	June 16, 2011
			08/18/13	08/20/13	2	1	National Planning Leadership and Tour of Moose-Wilson Corridor	O	August 19 – 21, 2013
			09/05/14	09/06/14	1	0	Attend White Grass Dude Ranch Reunion	O	September 5, 2014
Totals					222	87			

## Appendix 3: Lodge Day Use 2011 – 2014

The National Park Service (NPS) provided us the information on Brinkerhoff Lodge (Lodge) day use guests for 2011 to 2014 shown below.<sup>7</sup>

Name of Primary Guest(s)	Official Title	Affiliation	Date of Use	Approximate Number of Additional Guests	Trip Purpose
Interpretive Training	N/A	Grand Teton National Park (Park)	05/31/11	40	Seasonal training for interpretive staff (Regional Geology)
C. Bruce Sheaffer	Comptroller	NPS	06/08/11	25	Evening barbeque for attendees of Business Planning Institute
Pam Maples	Chief Executive Officer (CEO)	St. John's Medical Center	06/25/11	25-30	Retreat for Critical Incident Stress Management Workgroup
Grand Teton National Park Foundation (GTNPF)			07/26/11	24	GTNPF Dinner: donor cultivation and guest speaker Terry Winchell, owner of Fighting Bear Antiques.
GTNPF			07/28/11	24	GTNPF Luncheon: donor cultivation and women's luncheon after hike with Park staff
Michael Nash	Chief Ranger	Grand Teton National Park	09/07/11	25	Visitor and Resource Management retreat
Liz Finegan	Executive Director	St. John's Hospital Foundation	05/29/12	0	Tour Lodge with Park Superintendent Scott
Susanne Lewis Karen Wade Louis "Lollie" Plank	Former Yellowstone Superintendent Retired Intermountain Region Regional Director Board of Directors Sonoran Institute	Sonoran Institute	06/13/12	0	BBQ dinner with Park Superintendent Mary and Roger Scott with Lodge guests
Caterer	N/A	Grand Teton Lodge Company	07/10/12	0	Site visit for luncheon on 7/13
Addie Donnan	Founding Emeritus Chair: Murie Center Emeritus Board Member: Teton Science School	Board members for Park Partners	07/13/12	20	Appreciation luncheon
GTNPF			07/19/12	20	GTNPF Luncheon: hike with Park staff, donor cultivation, and guest speakers from GTNPF board of director members donor cultivation for luncheon after hike with Debbie Hechinger and Barbara Carlson
Teff Rodeffler	Program Manager	National Park Services Western Archeological and Conservation Center Museum Services Program	07/19/12	0	Tour of Lodge

<sup>7</sup> We made no changes to this information other than for organization, clarification of titles and acronyms, and classification of the Grand Teton National Park Foundation as the primary guest for its events.

Name of Primary Guest(s)	Official Title	Affiliation	Date of Use	Approximate Number of Additional Guests	Trip Purpose
Krista Schuster	Human Resources Officer	Northern Rockies- Servicing Human Resources Offices (SHRO)	08/16/12	3	Staff meeting
GTNPF			08/27/12	24	GTNPF Dinner: donor cultivation and guest speaker Terry Winchell, owner of Fighting Bear Antiques.
Roland Springer	Assistant Area Manager	Upper Snake River Field Office- Bureau of Reclamation	06/12/13	6	Coordination meeting regarding Jackson Lake and Jackson Lake Dam
Judy and Gordon Gibson		Married 50 years ago at the Lodge	07/29/13	0	Tour of Lodge
Jan Lynch	Executive Director	Grand Teton Association	07/30/13	40	Employee meeting and outdoor dinner
Krista Schuster	Human Resources Officer	Northern Rockies- SHRO	08/05/13	3	Staff meeting
GTNPF			08/15/13	24	GTNPF Dinner: donor cultivation and guest speakers Adrienne Mars (GTNPF board of directors member and Trustee and Director of Mars Foundation) and Judy Singleton (GTNPF board of directors member and President and CEO, J Singleton Financial)
Krista Schuster	Human Resources Officer	Northern Rockies- SHRO	07/24/14	3	Staff meeting
Luci Baines Johnson	Chairman of the Board LBJ Asset Management Partners	Youngest daughter of U.S. President Lyndon Johnson	08/01/14	20	Park management team lunch with guest
Joe Manchin and spouse Dave Freudenthal and spouse David Sokol and spouse	United States Senator Former Wyoming Governor Chairman, Teton Capital	West Virginia Wyoming	08/22/14	20	Luncheon and issue briefings with the Park management team
GTNPF			08/27/14	28	GTNPF Dinner: donor cultivation and guest speaker Nancy Donovan, GTNPF Board Member and founder of Discover Card
Jerry Blann Kevin Schneider Gary Pollock	President Deputy Superintendent Management Assistant	Jackson Hole Airport Board Park Superintendent	09/08/14	14	Dinner honoring the retiring airport director
Jan Lynch	Executive Director	Grand Teton Association	09/09/14	6	Staff Retreat
David Vela and Park management team	Superintendent and Management Staff	Grand Teton National Park	09/12/14	20	Appreciation Lunch for Lodge Caretakers and Grand Teton Lodge Company management and staff (Office of the Vice President Visit)

## Appendix 4: Billing and Revenue Collection 2011 – 2014

From 2011 to 2014, 11 payments have been received for Lodge use totaling \$7,143. Of these payments, four were billed or paid within 2 weeks of the guest's stay and seven were billed or paid late (up to 40 months late).

Primary Guest	Official Title	Affiliation	Known # of Additional Guests	Arrival Date	Departure Date	Total # of Nights	Payment Date	Amount Paid
Lisa Jackson	Administrator	Environmental Protection Agency	5	06/28/11	07/01/11	3	11/03/14	\$477
Barbara Johnson	Division Chief	Denver Service Center	0	07/18/11	07/21/11	3	07/21/11	632
Marcus Thomas	Architectural Intern	Denver Service Center	0	07/18/11	07/21/11	3	07/21/11	632
Chris Reel	Environmental Protection Specialist	National Park Service Intermountain Regional Office	1	08/14/11	08/18/11	4	08/26/11	632
Phillip Schiliro	Assistant to the President and Special Advisor	The White House	2	08/18/11	08/21/11	3	11/17/14	534
Jon Jarvis	Director	National Park Service	3	08/18/12	08/22/12	4	11/04/14	772
Craig Crutchfield	Chief of Interior Branch	Office of Management and Budget	1	07/31/13	08/02/13	2	07/23/13	326
Arne Duncan	Secretary of Education	U.S. Department of Education	3	08/07/13	08/13/13	6	11/03/14	1,158
Joseph Biden	Vice President of the United States	The White House	12	08/07/14	08/11/14	4	11/04/14	1,200
Michael Connor	Deputy Secretary	U.S. Department of the Interior	3	08/12/14	08/13/14	1	11/03/14	210
Sue Masica	Regional Director	National Park Service Intermountain Regional Office	1	08/13/14	08/16/14	3	11/05/14	570
Total								\$7,143

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## Appendix 5: Monetary Impact

From 2011 to 2014 there were 222 overnight stays, of which 186 were not paid, resulting in \$28,875 in lost revenues. This calculation is based on the prevailing per diem rate at the time of stay and an additional \$10 per person per night (National Park Service policy).

Issue	Funds Put To Better Use
Nights stayed at the Brinkerhoff Lodge from 2011 to 2014 for which no compensation was received.	<b>\$28,875</b>

## Appendix 6: Lodging Rate Comparisons

Location	Lodging type	Rate	Alternative rate (see comment)	Comments
<b>Brinkerhoff</b>	Log home	\$189.00	\$199.00	A log home with four bedrooms and two bathrooms. It has views of the surrounding park and is located on the shore of Jackson Lake. It has a total of six full-size beds and one king-size bed. Current prices are based on the Federal per diem rates for Teton County, Wyoming, in July 2015 plus \$10 per additional guest. The alternative rate is based on three guests.
<b>Jackson Lake Lodge</b>	Lodge/Cottage	\$335.00	\$346.00	A cottage with a view of the Grand Teton Mountain Range and Jackson Lake that has two double-size beds and private bathroom. A short walk to the main lodge, which has two restaurants, a cocktail lounge, and gift and apparel shops. Each additional person beyond two is \$11 each, up to five people. The alternative rate is based on three guests.
<b>Alpenhof</b>	Lodge	\$509.00	\$539.00	A two-bedroom suite with two bathrooms, a living room, and a wet bar. European breakfast included. The alternative rate is based on three guests.
<b>Snow King Resort</b>	Resort Hotel and Lodge	\$892.33	N/A	A fully furnished four-bedroom condo sleeps up to eight people.
<b>Spring Creek Resort</b>	Ranch	\$2,620.00	\$1,270.00	A villa located on a 1,000 acre wildlife refuge that has a wood burning fireplace, and either a patio or balcony with a view of the Teton Mountain Range. The alternative rate is based on a two-bedroom loft condo with a wood burning fireplace, and either a patio or balcony with a view of the Teton Mountain Range.
<b>Wort Hotel</b>	Hotel	\$665.00	N/A	A Western-themed, two-bedroom suite (reservation based on a stay from July 31 – August 3 due to limited availability during the month of July). The Wort Hotel is listed on the National Register of Historic Places.
<b>Jenny Lake Lodge</b>	Log cabin	\$702.20	\$869.80	A one-room duplex log cabin. Maximum occupancy is three people per cabin (including children). Includes full breakfast and five course dinner for each person daily. Horseback riding is free based on availability. The alternative rate is based on three guests.

Location	Lodging type	Rate	Alternative rate (see comment)	Comments
<b>Gros Ventre River Ranch</b>	Ranch-cabins, lodges, and houses available for rent	\$800.00	\$1,200.00	The suites are one bedroom, one bath, and include a living room, wood stove, washer and dryer, and kitchenette. The property sits on the banks of the Gros Ventre River and looks out at the major peaks of the Teton Range. Peak season identified as June 14 – August 16. Maximum occupancy is three guests. The alternative rate is based on three guests.
<b>Lost Creek Ranch</b>	Dude Ranch	\$13,500.00	\$6,300.00	A cabin with two bedrooms, two bathrooms, living room, kitchenette, fireplace, and two separate porches. The cabin sleeps up to eight guests. The \$13,500 weekly rate is for up to four guests plus \$700 per additional guest. Rates include all meals, housekeeping, laundry service, horseback riding with instruction, hiking, etc. Weekly rates only during the peak season (June 8 - August 29). The alternative rate is based on a "half duplex cabin," which sleeps up to three guests. \$6,300 weekly rate is for up to two guests plus \$700 per additional guest.
<b>Moosehead Ranch</b>	Dude Ranch	\$1,540.00	\$1,640.00	A private, two-bedroom, two-bathroom cabin that includes meals and riding for \$1,540 when the cabin is occupied by three or fewer guests. A 5-night stay minimum during peak season (June 3 – August 14). The alternative rate is \$410 per person when the cabin is occupied by four or more.

Note: the rates above reflect a reservation from July 10, 2015, through July 31, 2015, (unless otherwise noted) for premium lodging arrangements that are available at each location.

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## **Appendix 7: Bureau Response**

The National Park Service's response follows on page 32.



# United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, DC 20240

SEP 15 2015

To: Assistant Inspector General for Audits, Inspections, and Evaluations

From: Director *Jonathan Jarvis*

Subject: National Park Service Response to: Office of Inspector General Evaluation Report – Operation and Management of the Brinkerhoff Lodge at Grand Teton National Park (Report No. 2015-WR-019)

The National Park Service (NPS) has reviewed the Office of Inspector General (OIG) draft report entitled: "Operations and Management of The Brinkerhoff Lodge at Grand Teton National Park" (Report No: 2015-WR-2019) dated July 2015. We commend your staff for highlighting the challenges faced by our bureau in safeguarding park visitors and in achieving our stewardship responsibilities.

The Brinkerhoff has been closed to all overnight use since fall 2014 pending the OIG's review and evaluation. The report identified nine recommendations related to the Brinkerhoff's life safety, physical security, management as a cultural resource, and its overall operation and management. The report also included four appendices, one of which documented overnight lodge guests between 2011 and 2014. Although we disagree in a few instances with the report's characterization of the type of stay (official, invitational, or vacation), we are focusing our response on the nine recommendations in the body of the report<sup>1</sup>. A response is provided for each individual recommendation.

If you have any questions or need additional information, please contact Sue Masica, Regional Director, Intermountain Region at (303) 969-2503 or Vera Washington, NPS Audit Liaison Officer at (202) 354-1960.

Attachment

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<sup>1</sup> In addition, Appendix 4 does not reflect payment from John Wessels, former Regional Director, NPS Intermountain Region in the amount of \$2,567.

*National Park Service Response to: Office of Inspector General Evaluation Report entitled:  
Operation and Management of the Brinkerhoff Lodge at Grand Teton National Park  
(Report No. 2015-WR-19)*

**1. Conduct an assessment of the Lodge's habitability considering all applicable fire safety codes and obtain approval from the fire code officials.**

During the week of May 11, 2015, Grand Teton National Park convened a group of subject matter experts to conduct an onsite assessment of the Brinkerhoff to identify all applicable fire and life safety codes related to overnight use, as well as the physical security of the facility. We consulted with the Intermountain Regional Office staff to build a team of subject matter experts. Specifically, we worked with Todd Neitzel, Structural Fire Manager for the Intermountain Regional Office. Mr. Neitzel serves as the Authority Having Jurisdiction (AHJ) for structure fire purposes over all buildings within Grand Teton National Park to include the Brinkerhoff. Mr. Neitzel recommended that J. Andrew Wilson complete the onsite assessment in regards to fire/life safety. Mr. Wilson is a retired fire protection engineer, with 32 years of experience working for the Smithsonian Institution where he developed and managed the Smithsonian's fire protection program. He has extensive experience related to the protection of historic structures, museum collections, and NPS Policies and related reference documents.

Mr. Wilson's 10-page assessment and recommendations pertaining to the fire protection and life safety components are provided as an attachment to this memorandum. We intend to implement all necessary recommendations to receive approval from the AHJ for operating the facility prior to re-opening the Brinkerhoff. We will also conduct consultation under Section 106 of the National Historic Preservation Act as necessary prior to making any improvements that will affect the facility.

Target Date for Completion: Completed, May 2015

Responsible Official: Superintendent, Grand Teton National Park

**2. Conduct a security and protection assessment of the Lodge by qualified professionals.**

National Park Service Northeast Regional Office's Physical Security Specialist Mark Ross completed a separate physical security assessment during the same week mentioned above. Mr. Ross provides physical security support services including physical security assessments to all national park units in the Northeast with a primary emphasis on the protection of museum collection assets. Mr. Ross has 25 years of experience in the physical security field and before coming to the National Park Service, was a certified physical security specialist for the United States Army, and was involved in protecting various US Army assets.

Mr. Ross' 49-page assessment and recommendations pertaining to the physical security assessment are provided as an attachment to this memorandum.

Target Date for Completion: Completed, May 2015

Responsible Official: Superintendent, Grand Teton National Park

**3. Develop and implement a security and protection plan to ensure the Lodge, its guests, and its contents are appropriately protected and secured.**

Based on the fire/life safety and physical security assessments, Grand Teton National Park is well situated to develop and implement a security and protection plan. The security and protection plan will complement the final decision made for the future operation and management of the Brinkerhoff following this review. This plan will be developed in combination with the improvements necessary to address physical security and fire/life safety code compliance. The security and protection plan would be developed prior to resumption of overnight use of the facility.

Target Date for Completion: June 15, 2016

Responsible Official: Superintendent, Grand Teton National Park

**4. Complete preservation and productive use requirements for the Lodge, which should, at a minimum, include –**

**• completing a Historic Structure Report and Historic Furnishing Report**

We concur that a Historic Furnishings Report (HFR) should be produced and anticipate completing the report within 18 months of receiving project funds. Based on a cost estimate provided by the NPS Harper's Ferry Center, we estimate that the HFR will cost approximately \$40,000 to complete. Current cultural resource project funding sources are formulated through FY 17, and the park anticipates being able to compete for project funding in FY18. We will submit the project for the next Servicewide comprehensive call during fall 2015. While NPS project funding through the Servicewide Comprehensive Call is the traditional means to accomplish a task like an HFR, the park will also pursue options through private philanthropy to expedite completion of an HFR.

A HFR for the Brinkerhoff furnishings may deviate from the format of a traditional HFR, which typically identifies non-extant historic furnishings for public exhibit spaces in historic buildings. We do not believe this element is necessary since the Brinkerhoff is not anticipated to be used for general visitor or exhibit purposes, but rather, to remain focused as an administrative use facility. The HFR prepared for the Brinkerhoff Lodge furnishings will document and analyze the following:

- History and origin of the furnishings, and their relational context;
- Photographic inventory and documentation of existing conditions;
- Analysis of whether the furnishings were appropriately or inappropriately accessioned as museum pieces, and whether they should remain part of the collection or be deaccessioned;
- If determined appropriate as a museum collection, determination of authorization for consumptive use; and
- Recommendations for management and/or use.

Target Date for Completion: To be determined

Responsible Official: Superintendent, Grand Teton National Park

We do not concur that a Historic Structure Report (HSR) should be completed for the Brinkerhoff Lodge. HSRs are good practice in some circumstances, but are not required by law or policy. Further, HSRs are costly, time intensive, do not allow for public comment, and are generally conducted for properties for which there are significant rehabilitation efforts needed, and/or for which there is no clearly identified current use. Grand Teton has 697 historic buildings and structures eligible for or listed on the National Register of Historic Places. Of those properties, four have a completed HSR. The Brinkerhoff Lodge is

currently in good condition and has an identified use<sup>1</sup>, and is therefore not among the highest priorities for an HSR. It may be possible to consider development of an abbreviated HSR, building on the information contained in the National Register nomination. This would allow NPS to focus on documenting key features and treatment strategies. Further consideration of this option will be undertaken.

We agree that thoughtful and transparent planning to ensure the Brinkerhoff is being best utilized would be appropriate. Grand Teton is preparing a Historic Properties Management Plan and Environmental Assessment (HPMP) that analyzes the best current and potential use for all eligible buildings within the park. In order to address the question of use at the Brinkerhoff Lodge, Grand Teton will reference the identified use of the property in the draft HPMP process. The draft HPMP is currently scheduled for public release with a 30-day public comment period at the end of FY15. Referencing the use of the lodge as part of the HPMP process will allow transparency and provide the public and consulting parties (including the Wyoming State Historic Preservation Officer) an opportunity to comment, which would not be part of the HSR process.

- **determining whether furnishings are authorized for consumptive use**

We concur that determining whether the furnishings are authorized for consumptive use should be completed. The park has previously consulted with and followed guidance of the NPS Intermountain Region's Museum Program Manager with regard to use of the furnishings. We will continue to consult with that office in making determinations of appropriate use. Options include removal of some furnishings for storage in the museum collection and replacement with reproduction pieces for consumptive use. We anticipate completing these additional determinations as part of the Historic Furnishings Report as described above.

- **determining whether furnishings are subject to review in accordance to Section 106 of the National Historic Preservation Act of 1966**

According to the National Register of Historic Places nomination, completed in 1990, the furnishings at the Brinkerhoff Lodge contribute to its significance as a historic property and are therefore subject to review under Section 106 of the National Historic Preservation Act. Accordingly, we will continue to consult with the Wyoming State Historic Preservation Office, interested parties, associated tribes, and the Advisory Council for Historic Preservation prior to any undertakings that will have an effect on the property, including the furniture collection.

##### **5. Establish and implement policy to clearly define official use eligibility.**

A memorandum from Interior Secretary Manuel Lujan, dated February 18, 1992, provides guidance on VIP accommodations in the national parks. The memo concludes that VIP housing in the National Park Service will no longer be permitted. It goes on to state that the Brinkerhoff will be used for "NPS sponsored training and official conferences for Federal government employees, and for housing Federal employees on temporary duty in the park." Further, the memo requires that, "All persons using the facility must be on official duty status. Similarly, Federal employees on temporary duty status must have the appropriate supporting travel authorization or personnel assignment to qualify."

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<sup>1</sup> "Identified use" for the Brinkerhoff is proposed as: Administrative purposes, including meetings, conferences, and official purpose gatherings. Consistent with DOI secretarial policy (Lujan, 1992), this may include overnight use for training, official conferences for Federal government employees, and for housing Federal employees on temporary duty in the park.

The Regional Director, Intermountain Region (IMR) will be responsible for approving a Standard Operating Procedure (SOP), to be developed by the Superintendent of Grand Teton National Park, that will ensure that use of the Brinkerhoff Lodge adheres to this Secretarial direction and that it supports the purpose and intent of the 1992 Secretarial memorandum. This SOP will clarify that overnight use of the Brinkerhoff is limited to Federal or other governmental employees on official travel with an appropriate travel authorization. The policy will also clarify that day use of the Brinkerhoff may occur to support park-authorized trainings, meetings, or events, which may include non-federal employees. The SOP defining official use eligibility will be finalized prior to the Brinkerhoff being re-opened for overnight use.

Target Date for Completion: March 1, 2016  
Responsible Official(s): Superintendent, Grand Teton National Park  
Regional Director, Intermountain Region

**6. Establish and implement policy and procedures as to how NPS will document Lodge guest information. Such information should include the Lodge's primary guest, the official use during his or her stay, whether additional persons accompanied the guest during his or her stay, and whether the stay combined official and personal uses.**

The SOP created to define official use eligibility (see #5 above) will also include procedures on how relevant lodge guest information will be tracked. Specifically, the SOP will require the establishment of an electronic system to track details related to each guest's stay, including the Lodge's primary guest, the official business to be conducted during the stay, dates of official business, and additional persons accompanying the guest.

In addition, the park will require a copy of the signed travel authorization for all guests utilizing the Brinkerhoff. Copies of the travel authorization will be maintained in a separate file, organized by fiscal year, from general Brinkerhoff materials. In addition, a memorandum approving the guest's stay at the Brinkerhoff will be signed by the Grand Teton National Park Superintendent and will be retained in these files. Any other communications and approvals associated with an individual's stay at the Brinkerhoff will also be maintained. Personal uses will not be permitted.

The Superintendent of Grand Teton National Park will be responsible for ensuring this SOP and the electronic tracking system will be established prior the Brinkerhoff being re-opened for overnight guests. In addition, the Superintendent will be responsible for ensuring travel authorizations are obtained prior to guests staying at the Brinkerhoff and that these are maintained in an organized fashion.

Target Date for Completion: March 1, 2016  
Responsible Official: Superintendent, Grand Teton National Park  
Regional Director, Intermountain Region

**7. Establish and implement policy and procedures to identify when and how a waiver may be obtained for an individual or stay that would otherwise be considered ineligible.**

The National Park Service does not propose to allow for overnight stays that are for other than official business of the National Park Service. This will implement fully the Lujan policy. Day use that serves a purpose connected to the mission of the National Park Service or Grand Teton National Park Service will be allowed.

Target Date for Completion: March 1, 2016  
Responsible Official: Superintendent, Grand Teton National Park  
Regional Director, Intermountain Region

**8. Review and update current policy to establish a system to bill and collect payment from Lodge guests and to determine what documentation is needed to authorize guests who are not billed according to policy.**

The SOP generated by the Superintendent of Grand Teton National Park and approved by the Regional Director, IMR will also establish a system to bill guests for use of the Brinkerhoff. The SOP will ensure that all guests using the Brinkerhoff are billed for their stays, including official travel. The park will charge individuals' government charge cards during their stay. Charges for additional guests will be charged to the traveler's personal credit card.

Revenue from these charges will be deposited into a dedicated Brinkerhoff quarters account and will be used to fund ongoing operational and/or maintenance expenses for the facility.

A hard copy of the bill of collection associated with the reservation will be maintained with each travel authorization. Documentation of the individual's payment will also be maintained in this file.

Because overnight use of the Brinkerhoff will be limited to individuals on official travel, we do not expect circumstances to arise that would merit waiving fees.

Target Date for Completion: March 1, 2016  
Responsible Official: Superintendent, Grand Teton National Park  
Regional Director, Intermountain Region

**9. Reevaluate the 1992 secretarial policy to determine whether the prevailing Federal per diem rate or market rate should apply, taking into consideration the costs to operate and maintain the Lodge.**

The Brinkerhoff SOP that will be generated as part of this evaluation will specify the rate that will apply for overnight use of the Brinkerhoff. We believe that charging the Jackson, Wyoming, Federal per diem rate is appropriate for overnight guests, as doing so will permit official government travelers to stay at the facility. The Brinkerhoff SOP will also specify applicable fees and procedures to account for additional guests.

The NPS believes that if the Brinkerhoff is used, it will be better maintained. Numerous examples show that where historic buildings are not used, they quickly fall into disrepair. The NPS has a responsibility under law and policy to maintain the structure due to its historic value whether or not it is used for overnight lodging. In addition, because the Brinkerhoff is a historic facility, its maintenance costs are expected to be higher than they would if it were a modern facility. As such, we do not expect to generate sufficient revenue to fully fund the total cost of facility ownership for the Brinkerhoff, which would

include annual operating expenses, cyclic maintenance, component renewal, and capital improvements. Any revenue collected from overnight guests will be applied towards the facility's annual operating expenses. Grand Teton National Park will continue to seek project funding to cover cyclic maintenance, major repair and rehabilitation, and capital improvements for the facility. As an alternative, it may be appropriate to consider leasing of the facility. Further financial and programmatic analysis would be necessary before determining whether this is a viable alternative.

Target Date for Completion: March 1, 2016  
Responsible Official: Superintendent, Grand Teton National Park  
Regional Director, Intermountain Region

### **Conclusion**

We appreciate the OIG's review and evaluation of the Brinkerhoff Lodge in Grand Teton National Park. Prior to opening the Brinkerhoff for overnight use and occupancy, we will ensure that the structure is approved by the AHJ, we will install a physical security system to protect the historic structure and its furnishings, and we will implement a physical security and life/safety protection plan.

In addition, we will also establish a Brinkerhoff SOP prior to re-opening the facility. This SOP will define official use eligibility, establish procedures to document guest information, billing of guests, and define rates for overnight lodging.

We anticipate this work to be completed by June 2016. After these actions are completed, we will allow use of the Brinkerhoff for overnight stays associated with official duty travel. The SOP will be reviewed annually into the future and updated as necessary.

Further, we will incorporate use of the Brinkerhoff into the park's Historic Properties Management Plan and EA, which we expect to be available for public review late in FY 15, with a decision in 2016. We will also seek funding to complete an HFR, with funding expected by FY 18. The Superintendent of Grand Teton National Park is the responsible official for ensuring these tasks are completed.

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## Appendix 8: Status of Recommendations

In response to our draft report, the National Park Service concurred with Recommendations 1 – 3 and 5 – 9. It partially concurred with Recommendation 4 but sought an alternative resolution.

<b>Recommendations</b>	<b>Status</b>	<b>Action Required</b>
1, 2	Resolved and Implemented	No further action required.
3, 4, 5, 6, 7, 8, 9	Resolved and Unimplemented	The recommendations will be referred to the Assistant Secretary, Policy, Management and Budget for tracking of implementation.

