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May 12, 2026

VIA ELECTRONIC SUBMISSION (DOI eFOIA Portal)

FOIA Officer
National Park Service
U.S. Department of the Interior
1849 C Street NW, Mail Stop 2335
Washington, DC 20240

RE: Freedom of Information Act Request — Lincoln Memorial Reflecting Pool Procurement Records (Contract No. 140P2026C0028)

Dear Sir or Madam:

On behalf of Public Citizen, Inc., and pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, I request copies of the following records concerning the National Park Service's resurfacing, coating, and water-purification work at the Lincoln Memorial Reflecting Pool, including Contract No. 140P2026C0028 awarded on April 3, 2026, by the NPS Denver Service Center to Atlantic Industrial Coatings, LLC of New Canton, Virginia (the "Atlantic Industrial contract"), and the separate contract awarded to Greenwater Services of Brookfield, Ohio, for the Reflecting Pool water-purification system (the "Greenwater contract"):

1. The complete contract file for the Atlantic Industrial contract, including the base contract; all attachments and exhibits; all modifications and amendments, including the modification(s) that adjusted the contract value to $13.1 million; the Statement of Work or Performance Work Statement; the Independent Government Cost Estimate; all proposals, price offers, and revised offers submitted by Atlantic Industrial Coatings, including the offer that established the $13.1 million figure; the pre-award contractor responsibility determination; past-performance information considered in the award; and the SF-30, SF-1449, or equivalent award documentation.

2. The complete contract file for the Greenwater contract, including all of the categories of records identified in paragraph 1 above.

3. The Justification and Authorization (J&A) document(s) supporting the use of the "unusual and compelling urgency" exception under FAR 6.302-2 / 41 U.S.C. § 3304(a)(2) for each contract, together with the determination(s) and findings supporting the J&A.

4. Any capability statements, qualifications packages, prior contracting history, or similar records that the contracting office considered or relied on for either contract, including

any such records received from or concerning Atlantic Industrial Coatings, Greenwater Services, or any other vendor evaluated for the project.

If it is your position that responsive records exist but that those records (or portions of those records) are exempt from disclosure, please identify the records that are being withheld and state the basis for the denial for each record being withheld. In addition, please note that Public Citizen seeks each record in its entirety. Accordingly, please provide all nonexempt portions of the records, without redacting portions of any record as "non-responsive," "out of scope," or the like.

I request that any records produced in response to this request be provided in electronic form wherever possible.

To expedite review, Public Citizen welcomes the production of responsive records on a rolling basis as they are processed, and does not require the agency to assemble all responsive records before beginning production.

Public Citizen requests that all fees in connection with this FOIA request be waived in accordance with 5 U.S.C. § 552(a)(4)(A)(iii) because Public Citizen does not seek the records for a commercial purpose and disclosure "is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government."

The requested records will shed light on a $13.1 million federal procurement that is the subject of intense national media coverage and a federal lawsuit. According to The New York Times, the National Park Service awarded Atlantic Industrial Coatings a no-bid contract on April 3, 2026, after President Donald J. Trump publicly stated he had "a guy who's unbelievable at doing swimming pools" and that he had consulted three companies that had previously worked on his personal swimming pools before choosing one that had worked at Trump National Golf Club in Sterling, Virginia. See David A. Fahrenthold and Luke Broadwater, *The No-Bid Contract That Is Turning Washington's Reflecting Pool Blue*, N.Y. Times (May 8, 2026), https://www.nytimes.com/2026/05/08/us/politics/reflecting-pool-trump-contract.html. The Times reported that the Interior Department invoked the "unusual and compelling urgency" exception ordinarily reserved to prevent "serious injury, financial or other, to the government," but that administration officials made no public claim that such injury was likely. Id. On May 11, 2026, The Hill reported that the Interior Department had quietly added $6.2 million to the Atlantic Industrial contract late the prior week, bringing the total to $13.1 million — more than seven times the $1.8 million the President had publicly promised. See *Cost of Trump's reflecting pool repairs balloon by $11.3 million, to $13.1M*, The Hill (May 11, 2026), https://thehill.com/homenews/administration/5872939-reflecting-pool-renovation-cost-increase/. Also on May 11, 2026, the Cultural Landscape Foundation filed suit in the U.S. District Court for the District of Columbia seeking to halt the project, alleging that the administration bypassed statutorily required review of alterations to historic landmarks. See *Trump Reflecting Pool Paint Job Draws New Lawsuit Over Review*, Bloomberg Law (May 11, 2026), https://news.bloomberglaw.com/environment-and-energy/trump-reflecting-pool-paint-job-draws-new-lawsuit-over-review. The requested procurement records — the J&A, the contractor proposals, the cost estimates, and the contract modifications — would directly inform the public

about how a sole-source exemption was justified, how the cost grew sevenfold, and whether the contractor selection followed lawful competitive-procurement procedures. None of these records has been made public.

Public Citizen is a nonprofit research, litigation, and advocacy organization that represents the public interest before Congress, the executive branch, and the courts. Public Citizen has considerable expertise in the issues relevant to this records request — including federal procurement integrity, executive-branch conflicts of interest, and government transparency. Public Citizen has investigated and reported extensively on government contracting and spending decisions affecting Trump-affiliated entities, including its November 2025 *Banquet of Greed* report on financial conflicts of interest in the second Trump administration. See Jonathan Edwards, *Report: Donors to Trump's White House ballroom have $279B in federal contracts*, Wash. Post (Nov. 3, 2025), https://www.washingtonpost.com/politics/2025/11/03/trump-ballroom-donors-contracts-enforcement/.

Public Citizen does not have a commercial interest in the requested records.

Public Citizen has a strong record of effectively conveying information to the public, including information obtained through Public Citizen's use of FOIA, and Public Citizen intends to share the information received from this request with the public free of charge. Public Citizen distributes information through its website (https://www.citizen.org), Facebook (https://www.facebook.com/publiccitizen, more than 144,000 followers), Bluesky (https://bsky.app/profile/publiccitizen.org, more than 68,000 followers), and email listservs. It also maintains multiple blogs, publishes a bi-monthly newspaper (*Public Citizen News*), and issues frequent press releases (https://www.citizen.org/news/type/press/). Many of Public Citizen's reports, petitions, or other research products grab headlines in major newspapers, broadcast media, social media, and academic journals. See, e.g., Mikella Schuettler, *White-Collar Enforcement Sinks Under Trump, Group Says*, Bloomberg (Jan. 15, 2026), https://www.bloomberg.com/news/articles/2026-01-15/white-collar-enforcement-sinks-under-trump-public-citizen-says; Jacob Gardenswartz, *Trump promised to "drill, baby, drill." But Americans' gas costs are up, new report finds*, Scripps News (Dec. 16, 2025), https://www.scrippsnews.com/politics/trump-promised-to-drill-baby-drill-but-americans-gas-costs-are-up-new-report-finds. Nearly every day, print and broadcast media around the world mention Public Citizen or quote its experts. Public Citizen also makes its experts available to speak to the media, to speak at conferences, and to testify before Congress.

Accordingly, I request that you waive all fees for locating and duplicating the requested records because Public Citizen is entitled to a public interest fee waiver. If, however, a waiver is not granted, please advise me of the amount of any proposed search, review, and reproduction charges before you conduct those activities.

I further request expedited processing under 43 C.F.R. § 2.20(a)(2) and (a)(4). Public Citizen is an organization primarily engaged in disseminating information to the public, and there is an urgency to inform the public about an actual or alleged federal-government activity — the active performance of a $13.1 million sole-source contract on the National Mall, now under judicial challenge. The matter is also the subject of widespread and exceptional media interest with

possible questions about the government's integrity that affect public confidence. See sources cited above.

I expect a response within 20 working days as provided by law. If you have any questions regarding this request, please contact me by phone at 202.804.2744 or by email at zeverson@citizen.org.

Thank you very much for your attention to this matter.

Sincerely,

Zach Everson
On behalf of Public Citizen