



# The Coalition To Protect America's National Parks

*Voices of Experience*

July 12, 2017

The Honorable Ryan Zinke  
U.S. Department of the Interior  
1849 C Street NW  
Washington, DC 20240

Dear Secretary Zinke:

I am writing to you on behalf of the Coalition to Protect America's National Parks. The Coalition is composed of over 1,300 members who are current and former employees of the National Park Service. Our collective experience and these comments reflect nearly 40,000 years of combined service. Our mission is to advocate for all national park areas and effective stewardship of them.

The purpose of this letter is to express our concerns regarding your stated desire to contract out some services in various parks. We are especially concerned about the reported focus on potential outsourcing of campground management. Your rationale for considering this approach apparently arises from two predicted outcomes - cost savings and service improvement. As you potentially consider an initiative on this issue, we ask you to look at the facts relative to these proposals and consider our views.

Most importantly, we urge examination of the basic math. As you know, there are now 417 areas that comprise the National Park System. 118 of these park areas contain one or more campgrounds. About 100 of these campgrounds are currently operated by private entities (concessioners). About 400 campgrounds are operated by the National Park Service (NPS). The concessioner-operated campgrounds gross \$15 million annually and pay \$535,000 in franchise fees to the NPS. The NPS operated campgrounds gross \$25 million annually; 100% of these campground fees are available to the NPS for its operations. Some of these fees are applied to the fee collections programs; however, much of this funding is applied to essential investments, including infrastructure investments. If management of all 400 NPS-managed campgrounds was contracted out, an unlikely scenario, franchise fees would yield about \$890,000 annually. The NPS would, of course, continue to incur some campground related costs such as law enforcement, emergency medical services, search and rescue, and fire control. In some parks, certain utility costs would remain the responsibility of the National Park Service. Even the briefest review of these numbers clearly indicates that significant savings would not result from contracting campground services to private companies absent dramatic and we believe unacceptable increases in camping fees that we fear could price out families of lesser means who are seeking an affordable vacation on our public lands. Moreover, any such savings that might result from outsourcing management of some campgrounds seems a drop in the bucket when placed beside the threat posed by the administration's 2018 budget request, which would reduce the NPS budget by \$380 million. We urge you to reconsider these cuts and instead propose increased funding for NPS in future budgets.

Evaluation of proposed outsourcing of campground management also requires a comprehensive understanding of the nature and mix of the campground inventory. Of course, private operators will not be interested in campgrounds that rarely fill for many reasons and where opportunities for profit are limited. Based upon decisions made throughout management planning processes of the NPS, many park campsites provide limited services. Nearly half of the campground sites currently managed by the National Park Service are in that category; only 25% of concessioner-operated sites are so designated. These sites are popular; they allow visitors a quiet and more basic experience at lower cost. This range of campground development is consistent with NPS policy to provide a variety of service levels in parks. It has long been the goal of the National Park Service to support and accommodate different ways for visitors (including campers) to enjoy the park while being as welcoming as possible to all segments of the population. We fear that concessioners would have no incentive to maintain primitive sites that allows for the public to enjoy park campgrounds in different ways. Any effort to bid out additional campground operations should take these important factors into consideration.

We urge consideration, as well, of the long-standing NPS policy of promoting development of commercial services, including campgrounds, in communities (gateway towns) surrounding the parks. "The Park Service will encourage the development of private sector visitor services in gateway communities to contribute to local economic development..." (Management Policies 9.3, page 135). Your April 19, 2017 press release cites the \$34.9 billion added to the U.S. economy by national park visitation. The release goes on to point out that 318,000 jobs were added, "the vast majority of them...local jobs...in the hospitality, retail, transportation, and recreation industries." In many communities, proposals to expand private operations in parks gives way to the existence of an adequate local service mix. As our membership knows well, there was a time when NPS tried to build enough roads, campgrounds, parking lots, etc. to accommodate ever-increasing visitation. We learned that it was far better to encourage development of commercial services on less fragile landscapes outside of parks, which boosts local economies through visitor spending at numerous businesses in the communities while they visit, as well as through tax revenue. This money is recirculated within those economies and fosters valuable local support for parks.

We ask as well that you consider the many collateral duties performed by park rangers working at campgrounds. These rangers are trained in other duties so that they can be moved during times of emergency to address search and rescue needs or to fight wildfires. Park superintendents should have the flexibility to meet these needs for public safety and resource protection, and private-sector workers would have neither the training nor the authority to meet these needs.

We urge that you consider, as well, the role that volunteers increasingly play in the stewardship of NPS campgrounds. As now occurs in campgrounds managed by the U.S. Forest Service, volunteers (often retirees who live in their own recreational vehicles in NPS campgrounds) carry out a wide variety of campground management tasks - at virtually no expense to the government. These individuals receive no pay and are very dedicated to serving the public and the park. They would not likely volunteer to perform such duties in service to a commercial company, which would be a missed opportunity for cost savings. Furthermore, parks benefit from volunteers who help maintain and repair campgrounds. Operation of these campgrounds by for-profit businesses would likely deter the volunteerism that helps parks maintain their campsites.

As you know, the public's surveyed responses to existing park experiences, outlined in the budget request, exceed a 90% approval rating. We know, as well, that much of this positive feedback is based upon personal contact with uniformed rangers in visitor centers, entrance stations, interpretive forums, AND campgrounds. Though some argue that NPS personnel could remain in campgrounds to perform interpretive services, the reality is that parks are understaffed and the rangers who perform the basic services that would be taken over by concessioners are often the only contact visitors have in those campgrounds with these popular public servants. Furthermore, the presence of a uniformed ranger can act as a deterrent to disruptive, inappropriate or criminal behavior.

As you further consider these proposals we recommend a thoughtful and transparent approach that fully considers our views and those of other groups and individuals who support a vibrant National Park System. The Coalition would welcome the opportunity to work with you to identify and assess opportunities to achieve savings and provide better visitor services, the stated goals of this effort.

Given the lack of meaningful savings, negative impacts to the public, and in the face of a proposed unprecedented budget cut, we urge a cautious, conservative and inclusive approach to this effort.

Sincerely,

A handwritten signature in black ink that reads "Maureen Finnerty". The signature is written in a cursive, flowing style.

Maureen Finnerty  
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