

## The Coalition to Protect America's National Parks

### Ten Core Requirements to Reopen

- While we understand that there are plans being made to open parks in stages, they should not open until the safety of National Park Service employees, concession employees, volunteers and other partners, including those in gateway communities, can be ensured. Prior to parks opening for the season, these plans should be distributed to park employees, including seasonal employees prior to onboarding, and made available to the public (such as posting the plan on the park website).
- Parks should not be expected to reopen overnight. While working with local and state governments is important, the NPS should follow the most cautious standards to ensure the safety of all involved in park operations, as well as visitors who visit inside the parks and utilize services in gateway communities.
- Park staff must have the necessary capacity to safely provide visitor services and protect park resources, including:
  - adequate staff
  - personal protective equipment
  - employee training including specific training related to COVID19 and NPS Safety training
- Superintendents, in consultation with their local communities, should be given the authority to make decisions about what is happening in their own parks.
- The vast majority of front-line NPS staff are or will be in close contact with park visitors coming from outside the local area. As a result, these employees should be considered to have *Medium Exposure Risk* and NPS should implement recommended control measures consistent with OSHA's *Guidance on Preparing Workplaces for COVID-19*.<sup>1</sup> For public contact employees, NPS should provide for daily workplace employee temperature screening to ensure detection of individuals showing symptoms of COVID-19.
- Parks must ensure that local health care providers have the testing capacity on-hand to test symptomatic employees in a timely manner, rather than waiting until symptoms worsen or require treatment.
- Many NPS employees live on-site, in close quarters, in government-owned housing. **According to an NPS document, parks should estimate that 40% of the total population at the park will require isolation and 4% will require hospitalization.** This is unacceptable. There must be adequate space available in employer-provided housing to ensure for social distancing and to provide for isolation of individuals showing early signs of infection.

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<sup>1</sup> <https://www.osha.gov/Publications/OSHA3990.pdf>

- There must be adequate custodial staffing to ensure frequent cleaning (i.e., more than the typical once or twice a day) of all public restrooms that are open for use. This is particularly a concern in campground and visitor center restrooms, which will be a concentrated public use facility regardless of how many campsites and visitor centers are open or closed.
- There must be system-wide and individual park plans in place that can be fully funded and properly executed prior to reopening including safety plans that ensure compliance with CDC and OSHA guidelines and NPS Safety Policy.
- GAR safety analyses should be completed on plans and park operations including employee housing, concession operations, volunteer programs, cooperating association and other partner operations or contractor activities.