



Michael T. Reynolds
Acting Director
National Park Service
1849 C Street, NW
Washington DC 20240

RE: National Park Service Targeted Fee Increase Proposal

Dear Director Reynolds:

Thank you for the opportunity to comment on the entrance fee proposal that the National Park Service (NPS) recently announced.

Outdoor Industry Association (OIA) is the national trade association for suppliers, manufacturers and retailers in the \$887 billion outdoor recreation industry, with more than 1300 members nationwide, including recognized brands like The North Face, Columbia Sportswear, and Cabela's. The outdoor industry supports more than 7.6 million American jobs and makes other significant contributions toward the goal of healthy communities and healthy economies across the United States.

Outdoor Alliance is a coalition of nine member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, and Colorado Mountain Club and represents the interests of the millions of Americans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes.

We believe fees may sometimes be a necessary tool for park projects and programs and tackling backlog and deferred maintenance, and we support reviewing the fee program. We ask that you strongly consider the comments you receive from the public and stakeholder groups, so you can arrive at the best solution for the parks and the American people. In general, while we accept that fee increases may be necessary under certain circumstances, we believe that our country's public lands must remain accessible for all Americans, regardless of income level. We know it is not the intention of NPS to price some Americans out of experiencing the landscapes in which we all share ownership, and hope we can work together on a targeted fee increase that meets our shared goal of introducing more people to the great outdoors.

OIA and OA have received many comments from our members who have an interest in the maintenance and accessibility of our national parks and are troubled by the proposed fee increases. From the feedback we have received, our members are concerned that doubling or tripling national park fees will price many Americans out of their parks and limit their access to outdoor recreation.

We ask you to please consider the following recommendations:

- 1) Extend the public comment period. The last time we were asked to weigh in on park fee increases, the public was given seven months. We hope you will extend the comment period, particularly as 16 of the 17 parks in the proposal have recently had fee increases.
- 2) Use market-based data and research to determine if the proposed fee increases will limit access for some Americans to their parks and if phasing in smaller increases over time will be less of a financial burden on American families.
- 3) Adjust peak season dates to better reflect the most visited times in the identified parks. We agree that an increased fee during peak season may help address overcrowding at America's most popular national parks, could help mitigate impacts on the land, and would possibly encourage visitors with more flexible schedules to plan their trips during the shoulder seasons. The identified peak season dates, however, appear overly broad for some locations, and should be better tailored based on visitor use data.
- 4) Understand the impacts of fee increases to groups operating under Commercial Use Authorizations (CUAs) or Special Use Permits (SUPs). Many nonprofits, educational institutions, and businesses help people enjoy safe and exciting experiences in the outdoors under CUAs and SUPs, often helping these people overcome financial and other barriers to getting outside. Under the new proposal, if an organization is not a concessionaire at a park, customers cannot use a personal annual pass on a commercial trip. They must pay the entrance fee, adding a financial burden, which would be further exacerbated if the entrance fee increases from \$10 to \$30 per passenger in the CUA and SUP vehicle. This adds significant costs to these trips and could negatively affect the small businesses, schools, and nonprofits that are facilitating access to our national parks for underserved communities.

We believe that Congress and the administration should prioritize funding for outdoor recreation infrastructure in our national parks and other public lands. The \$70 million that the entrance fee increases are estimated to generate would not only be severely inadequate to address the \$12 billion maintenance backlog in our national parks, but is particularly troubling considering the nearly \$380 million in proposed budget cuts to the National Park Service in the president's FY 2018 budget. Pivoting to increased dependence on the visitors who happen to visit National Parks abdicates our responsibility as Americans to protect our national treasures for future generations. We would like to see a strong and comprehensive approach to funding the parks and addressing long-term issues stemming from inadequate agency funding, including appropriated dollars and other funding that may include some incremental fee increases phased in over time.

Americans love their parks. Now is the time for congress and the administration to prioritize funding for these iconic places and make the investment that is critical to the surrounding local communities and our state and national economies.

Thank you for the opportunity to comment on this important proposal, and we we look forward to working with you in the coming months as you come to a final determination on the proposed fee increases.

Sincerely,



Jessica Wahl
Government Affairs Manager
Outdoor Industry Association



Louis Geltman
Policy Director
Outdoor Alliance