



December 21, 2017

Acting Director Michael T. Reynolds
National Park Service
Recreation Fee Program
1849 C Street NW, Mail Stop: 2346
Washington, D.C. 20240

Re: National Park Service Proposes Targeted Fee Increases at Parks to Address Maintenance Backlog

Dear Acting Director Reynolds,

We, the undersigned members and friends of the Outdoors Alliance for Kids (OAK), urge you to protect access to America's national parks and public lands for all children, youth, and families by withdrawing your proposal to increase entrance fees at 17 national parks. Today's young people are growing up inside, spending less time in nature than any generation in history, with profound consequences for their health and the health of our economy. Raising fees to the proposed rate of \$70 per vehicle may price middle- and low-income families out of our parks and reverse important strides the National Park Service (NPS) has made over the years to expand equity and access to nature for all Americans. Instead of raising fees to address the maintenance needs in our parks, we urge you to work with Congress to identify adequate funding for our national parks, public lands, and their ongoing maintenance.

Background on OAK

OAK is a national strategic partnership of nearly 100 businesses and organizations representing more than 60 million Americans, with a common interest in connecting children, youth, and families with the outdoors. Our members are united by the belief that the wellness of current and future generations, the health of our planet and communities, and the economy of the future depend on humans having a personal, direct, and life-long relationship with nature and the outdoors. OAK's mission is to ensure that children, youth, and families have equitable and readily available opportunities to experience the outdoors. OAK appreciates the opportunity to comment on the NPS fee increase proposal.

Comment Period

We acknowledge that the comment period has been extended to 60 days. However, we believe that a 90-day comment period would be a more appropriate length to allow for careful consideration of an increase of this magnitude. Allowing 90 days more time for public review is particularly important in this instance for several reasons. First, these increases are large, and they would be implemented at parks located across the entire country. As a result, this proposal will be much more impactful than a modest increase at a single park. Second, the announcement gives no indication that the Service has carefully considered the impact of this fee increase on park visitation and access. Third, there is no indication that the NPS has factored in revenue lost from the deterrent effect of higher fees. Therefore, there is no evidence that the projected revenue increase will actually occur.

Because this increase will have a significant impact on the visiting public, and may not produce the additional revenue that has been projected, we urge NPS to extend the comment period for a minimum of 30 additional days to allow the public to carefully analyze the impacts of this proposal.

Impact of the Fee Increase

Under this proposal, the seven-day entrance fee would increase to \$70 per private non-commercial vehicle, \$50 per motorcycle, and \$30 per person during a five-month peak season period in 17 national parks. The price of a park-specific annual pass would also increase to \$75. This proposed increase would be extreme, amounting to a 200 percent increase in some parks and a 300 percent increase in others. While the NPS claims the fee hike will generate approximately \$68.6 million in revenue, it lacks any analysis on whether or not this fee hike would deter visitation. We believe the proposed fee hike will have a profoundly negative impact on middle- and low- income children and families, potentially reducing access and equity to our shared public lands for millions of Americans.

Effect on the Maintenance Backlog

Furthermore, the stated intention for the fee hike proposal is to raise revenue to address the maintenance backlog. OAK fully understands the need and supports efforts to address the maintenance backlog in our parks and public lands. However, the current maintenance backlog has a price tag of \$11.9 billion. By the park service's own estimates, which do not consider impact on visitation as stated above, the fee hike proposal will only generate \$68.6 million. A recent [editorial in the Washington Post](#) reported that it would take 161 years to address the maintenance backlog at this rate. This proposal will price average Americans out of our parks, while doing very little to generate the serious revenue needed to address the critical challenge of maintenance. The Administration's recent budget proposal to Congress recommended cutting the NPS budget by \$322 million, including \$168 million for operations. We urge you to work with Congress to pass a budget that adequately addresses the operations and maintenance needs of our parks and all public lands, rather than shifting the burden to kids and families.

Impact on Local Economies

Lastly, the National Park Service's proposal to raise \$68.6 million in revenue may inadvertently impact local economies that depend on visitation for income generation. According to the [National Park Service's](#) own data:

"In 2016, the National Park System received an estimated 330,971,689 recreation visits. Visitors to National Parks spent an estimated \$18.4 billion in local gateway regions (defined as communities within 60 miles of a park). The contribution of this spending to the national economy was 318 thousand jobs, \$12.0 billion in labor income, \$19.9 billion in value added, and \$34.9 billion in economic output. The lodging sector saw the highest direct contributions with \$5.7 billion in economic output directly contributed to local gateway economies nationally. The sector with the next greatest direct contributions was the restaurants and bars sector, with \$3.7 billion in economic output directly contributed to local gateway economies nationally."

There is no evidence showing that the NPS has taken into account the deterrent effect of increased fees on visitation and the impact that decreased visitation will have on local gateway communities. When these effects are taken into account, it is possible that the overall net effect of the fee increase will be negative. If so, the increase will not achieve its stated goals.

Conclusion

Now more than ever, we must find ways to welcome kids and families to our parks and public lands. Access to our parks provide kids with valuable opportunities to play, get active, and learn about the natural world. We

urge you to expand access to parks and public lands for our children and youth. The Every Kid in a Park program is an example of a positive step forward the NPS is taking to address the growing divide between children and the great outdoors. At a time when America's children are increasingly sedentary and disconnected from nature, we should be expanding opportunities to visit our parks for all kids, particularly those with limited economic means.

We thank you again for the opportunity to comment. Please contact Jackie Ostfeld, co-founder and chair of the Outdoors Alliance for Kids, at 202-548-6584 or jackie.ostfeld@outdoorsallianceforkids.org, with any questions related to these comments.

Sincerely,

Alliance for Childhood
Alliance of New York State YMCAs
American Camp Association
American Society of Landscape Architects
Appalachian Trail Conservancy
Association of Outdoor Recreation and Education
Avid4 Adventure
Big City Mountaineers
California State Parks Foundation
Campaign for Environmental Literacy
Children & Nature Network
Friends of the Assabet River National Wildlife Refuge
Girl Scouts of the USA
GirlTrek
GreenLatinos
Hip Hop Caucus
Kids4Trees
National Interscholastic Cycling Association
National Recreation and Park Association
National Wildlife Federation
National Wildlife Refuge Association's Urban Refuge Program
North American Association for Environmental Education
Outdoor Foundation
Outdoor Outreach
Safe Routes to School National Partnership
Sierra Club
SOS Outreach
The Wilderness Society
Transforming Youth Outdoors
Washington Trails Association
Wilderness Inquiry
YMCA of the Greater Twin Cities
YMCA of Metropolitan Washington
YMCA of the USA