

The Coalition for Outdoor Access respectfully submits these comments regarding the National Park Service's proposal to increase entrance fees as described in the notice issued October 24, 2017 titled "National Park Service Proposes Targeted Fee Increases at Parks to Address Maintenance Backlog."

The Coalition for Outdoor Access is a broad alliance of organizations and companies whose mission is to increase access to public lands and waters for facilitated recreation and education activities. Our coalition includes outfitters and guides, nonprofit organizations, conservation groups, advocacy and volunteer groups, outdoor industry companies, colleges and universities, metropolitan outdoor programs, military programs, and therapeutic programs. We collaborate with land management agencies to improve opportunities for the public to access public lands with the support of an outfitter, guide, school, nonprofit or other organized group.

We recognize the need to fund the maintenance and repair of critical infrastructure in national parks including campgrounds, bathrooms, waterlines, roads, bridges, and other visitor services in the National Park Service (NPS) system. However, we are concerned the proposed entrance fee increases are only projected to raise an additional \$68.6 million annually of the \$11.9 billion needed to tackle the maintenance backlog in our parks, and will simultaneously impact our facilitated outdoor programs and trips, affecting small businesses, nonprofits and education institutions working to connect more Americans with their public lands. Specifically, we offer the following points for consideration:

1. A thirty-day comment period for a fee increase of this magnitude is insufficient to fully understand the impacts these fee increases could have on organizations that partner with NPS to foster positive outdoor experiences, as well as impacts on the general public. One month will likely not allow enough time for NPS data collection and market-based research, NPS outreach to specific communities impacted, or general public participation. 16 of the 17 parks in this proposal have implemented fee increases in recent years with significantly longer comment periods and extensive collaboration between the public, commercial service providers, and the park.

2. National parks are national treasures intended to be accessible to all citizens. NPS Management Policies 2006 (*NPS Management Policies 2006, Chapter 8, Section 8.2*) states that parks will have "an atmosphere that is open, inviting, and accessible to every segment of American society." The service providers we represent assist members of the public who choose to have a facilitated recreational experience on their public lands, as well as underserved populations. The proposed entrance fee increases by NPS could significantly undermine our ability to serve these populations and the goal we share with the Park Service to make parks "accessible to every segment of American Society."

It has been recognized that some segments of the American population are hesitant to take advantage of their public lands due to de facto barrier such as "lack of knowledge, experience, and awareness (what to do, where to go, how to get there, equipment needed, etc. see: "Parks and Under-Served Audiences: An Annotated Literature Review," Pease 2011)" The Coalition for Outdoor Access represents organizations that help people overcome some of these barriers, thereby offering an opportunity for more diverse segments of society to experience national parks and wilderness. The proposed fee increase will make it more difficult for us to achieve this goal.

3. The anticipated additional revenue generation of \$68.6 million per year will have little impact on the current maintenance backlog nearing \$11.9 billion, while also placing a financial burden on recreation service providers and the public they serve. For outfitters and guides that access national parks through Commercial Use Authorizations (CUA) and Special Park Use Permits (SPUP) entrance fees would increase

between 150-300%. With the majority of CUA and SPUP holders being educational organizations, nonprofits and smaller outfitter/guide businesses, this per-passenger tripling in cost would have a notable impact on operating costs.

In summary, we believe that this fee increase is both bad for facilitated access and for the American public, and will not fix the National Park Service funding needs.

Sincerely,

Rebecca Bear
Co-Chair, Coalition for Outdoor Access
Director of Outdoor Programs and Experiences, Recreational Equipment, Inc.

Jessica Wahl
Co-Chair, Coalition for Outdoor Access
Advocacy Manager, Outdoor Industry Association

Courtney Aber
National Director, YMCA BOLD and GOLD

Aaron Bannon
Environmental Stewardship Coordinator, NOLS

Katherine Hollis
Conservation and Advocacy Director, The Mountaineers

David Leinweber
Chairman, Pikes Peak Outdoor Recreation Alliance and Owner, Angler's Covey Inc.

Dan Nordstrom
CEO Emeritus, Outdoor Research

Paul Sanford
National Director of Recreation Policy, The Wilderness Society

Jeannette Stawaski
Executive Director, Association of Outdoor Recreation and Education

Matt Wade
Advocacy & Policy Director, American Mountain Guides Association