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November 28, 2017

Acting Director Mike Reynolds
National Park Service
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Mr. Reynolds:

The Pew Charitable Trusts' Restore America's Parks campaign welcomes the opportunity to comment on the National Park Service (NPS) peak-season entrance fee proposal and its proposal on entry and permit fee adjustments for commercial tour operators. The Restore America's Parks campaign seeks to conserve the natural and cultural assets of the National Park System by providing common sense, long-term solutions to the \$11.3 billion dollar deferred maintenance challenge facing NPS (based on 2016 data).

Addressing a maintenance backlog of this size requires an innovative and multi-pronged approach. When Congress established the NPS with enactment of the NPS Organic Act in 1916, it mandated the agency "conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."¹ Congress, therefore, is ultimately responsible to ensure that the agency has the resources necessary to fulfill this mission: proper maintenance of infrastructure is an integral part of this mission. Many of the National Park System's 28,000 buildings, 12,500 miles of roads, 18,000 miles of trails, 3,000 utility systems, and thousands of parking lots, waterfronts, marinas, and campgrounds facilitate safe access, preservation of our nation's history, recreation opportunities, and protection of natural and cultural resources.

We support several legislative initiatives that would help Congress fulfill its responsibility to protect our national parks. The bipartisan National Park Service Legacy Act (S. 751 and H.R. 2584) would direct up to \$500 million per year in dedicated annual funding over 30 years to address national park maintenance needs from unobligated mineral revenues. Similarly, the Land and National Park Deferred Maintenance Act (H.R. 2863) would direct \$375 million annually to park maintenance for seven years.

¹ National Park Service Organic Act, 16 U.S.C. § 1 (1916).

The multi-billion dollar park maintenance backlog represents a huge challenge, and it is appropriate that additional solutions be considered to keep deferred maintenance from escalating in the future. Along with dedicated annual federal funding, the following are needed: adequate annual appropriations, inclusion of robust national park maintenance provisions in a national infrastructure program, increased Highway Trust Fund monies for national park transportation system maintenance, more opportunities for public-private partnerships to address maintenance (including real estate leasing, volunteerism, pilot projects with corporations that encourage efficiencies and technological innovations), and policy reforms.

Changes to user fees should be part of this discussion and it should be noted that directing a portion of entry fees to maintenance needs is not a new concept. However, fee increases should not have significant adverse effects on park visitors, they should be spread more evenly throughout more parks, and NPS should allow for ample public comment.

Entrance Fee Proposal

Pew does not support an increase of entrance fees to \$70 in 17 parks during their busiest continuous five month period. At a time when NPS is encouraging more access to and stewardship of our public lands, we urge you to carefully consider the implications of this proposed increase on visitors and gateway communities.

For instance, in parks that are popular day destinations—Mt. Rainier National Park (NP) near Seattle, Rocky Mountain NP outside of Denver, and Shenandoah NP near Washington, DC—would a \$70 pass deter day visitors? This could result in lost opportunity for new visitors to enjoy our parks, lost income to NPS, as well as lost income to local communities that depend on park visitors for their economic livelihood.

Under the Federal Lands Recreation Enhancement Act (FLREA), 80 percent of fee revenue goes to the respective parks that collect fees and the remaining 20 percent is distributed among parks that do not charge admission. Currently, 55 percent of both the 80 percent and 20 percent figures are allocated to deferred maintenance projects. Based on this formula, approximately \$38.5 million of the projected \$70 million revenue increase would go toward park maintenance. When considering new income, NPS must weigh potential losses to park visitation and the local economies that rely on visitor spending.

Pew recommends the following changes or improvements to the existing fee collection system, which may have the benefit of maintaining visitor access and providing more NPS revenue via smaller increased fees across a greater number of park sites:

1. Fully utilize NPS' current four-tier fee structure;
2. Increase online pass purchases and the use of entrance-fee collection technology;
3. Consider a daily fee in lieu of a weekly fee;
4. Increase the price of the America the Beautiful annual pass; and
5. Consider charging international visitors a higher fee for the America the Beautiful annual pass.

Recommendation 1: Fully utilize NPS' current four-tier fee structure

Of the 417 national park units, 118 units charge fees currently. The NPS has a tiered entrance fee structure that was the result of a 2001 study commissioned to consider options for improving recreation revenue programs. Changes were made after deliberation and input with stakeholders, local communities, and the public at large. After a five year process, NPS developed a four-tier entrance fee model (Table 1), which was implemented in 2006. NPS groups park units into tiers based on size, complexity of operations, and visitation patterns.² In 2008, fees were frozen at 2007 levels.

Table 1.

Tier	Annual Pass	Per Vehicle	Per Person	Motorcycle
1	\$20	\$10	\$5	\$5
2	\$30	\$15	\$7	\$10
3	\$40	\$20	\$10	\$15
4	\$50	\$25	\$12	\$20

The freeze was lifted in 2014 and after a seven month public input process, an updated four-tier fee structure was implemented. The structure, which is still in place, is posted in Table 2. Over 100 park units raised fees in 2015 and 2016, though units are not required to charge the full amount listed in their respective tier groups.

Table 2.

Tier	Annual Pass	Per Vehicle	Per Person	Motorcycle
1	\$30	\$15	\$7	\$10
2	\$40	\$20	\$10	\$15
3	\$50	\$25	\$12	\$20
4	\$60	\$30	\$15	\$25

For example, of the 17 national parks—all of which are tier three or four parks— identified by NPS for proposed entrance fee increases, only six charge the upper limit of their tier. We recommend that NPS require all 118 park units that accept fees to charge at the upper limit of their respective tiers, throughout the year.

This existing fee system, which has been vetted with the public and local communities, should be fully employed before implementation of new fees is considered. Moving forward, a regular schedule that allows for reasonable and incremental fee increases could be considered. As part of this process, NPS could more regularly assess which national parks units can feasibly charge

² Tier 1 refers to national historic sites, national military parks, national battlefields, national battlefield parks, national memorials or shrines, national preserves, and parkways; Tier 2 refers to national seashores, national recreation areas, national monuments, national lakeshores, and national historical parks; Tier 3 refers to national parks; and Tier 4 refers to the ten most visited national parks of: Bryce Canyon, Glacier, Grand Canyon, Grand Teton, Olympic, Rocky Mountain, Sequoia-Kings Canyon, Yellowstone, Yosemite, and Zion.

fees, as this may change over time due to budgets, cooperative management practices, or the implementation of new technologies. There may be park units where it simply does not make sense to collect fees or where the decision is made to keep admission free.

Recommendation 2: Increase online pass purchases and the use of entrance-fee collection technology

At some park units, fee collection opportunities are lost when there is not sufficient staff capacity to operate fee collection kiosks at certain times. It is also not practical to have collection stations at every park access point. In addition, paying staff to collect fees is costly, as multiple tiers of staff are required when monetary transactions are involved. We recommend that NPS continue to invest more resources to facilitate the purchase of park passes electronically. This would enable the agency to capture revenue despite obstacles like multiple entry points and unmanned kiosks. Additionally, with a greater online presence, NPS could engage new demographics and potential visitors, as well as create opportunities such as sending renewal notices to existing annual pass holders.

We encourage NPS to continue partnerships that allow the agency to use e-passes and to explore use of existing technology for fee collection, such as automatic payment via vehicle transponders. An example of this technology is the EZ-pass transponder used in the eastern and mid-western U.S. to collect transportation fees, such as tolls. Similar technology could be used to pay for entrance fees at parks. Because auto payments via electronic devices might also cut down on wait times at park entrances, this approach may also enhance visitor experience.

Recommendation 3: Consider a daily fee in lieu of a weekly fee

At most parks, visitors pay their fee and receive a week-long pass. Yet many park visitors do not stay a full week at these sites. We suggest that NPS conduct a study to analyze projected revenues if parks were to charge moderate daily admission rates in lieu of a weekly rate. The daily fee model could be structured along the lines of the current tiered system that categorizes similar parks based on size, complexity of operations, and visitation patterns. A study could help determine if a modest daily fee would generate more revenue than a weekly fee. Variables such as visitor length of stay, park destinations, various fee price points, and potential impact on visitors' travel behavior, as well as other factors, would need to be evaluated.

Recommendation 4: Increase the price of the America the Beautiful annual pass

NPS offers a number of interagency passes to individuals, such as the senior pass and the annual pass. The annual pass costs \$80 and allows entrance to most park units that charge fees, as well as other agency recreation areas. The \$80 cost of the annual pass is the result of a 2006 NPS-commissioned study and it has not changed since. Based on feedback from focus groups that Pew commissioned in 2016, we urge NPS to increase the cost of the America the Beautiful annual pass to \$100. A majority of the participating focus group individuals supported an increase of the annual pass price to \$120. If the \$80 price set in 2006 were simply adjusted for inflation, the annual pass would cost roughly \$97 per person today.

Recommendation 5: Charge international visitors a higher fee for the America the Beautiful annual pass

The U.S. Travel Association estimated that, in 2015, 13.6 million foreign travelers visited national parks and monuments, which represented 35.4 percent of all overseas visitors to the United States. Economists at the Association project that the share of international visitors to our national parks will increase in future years. They estimate that “the total number of overseas arrivals to the U.S. is expected to reach 40 million in 2017, and the share of these travelers that visit a national park or monument is projected to increase to 36.5 percent.”³

Because national parks attract such a large volume of international visitors every year, an increased fee for the purchase of the America the Beautiful annual pass by international visitors has the potential to raise additional funds for NPS. Individuals—citizens or non-citizens—who purchase annual passes must show identification at the time of purchase and at each park unit they enter thereafter.

We recommend that NPS assess potential revenue generation from increasing the price of the annual pass for international visitors. The assessment should examine the numbers of international visitors to national parks, park destinations, length of stay, and number of international visitors who travel individually versus part of a tour group.

It is not uncommon for other countries to charge higher entrance fees to their national parks for international visitors. For example, 19 of South Africa’s 20 national parks charge higher entrance fees for international visitors. Of those 19 parks, all charge at least twice as much for non-citizens and the majority charge four times the price that South Africans pay.⁴ Galapagos National Park in Ecuador charges higher rates for international visitors; non-citizens pay \$100 per adult, while Ecuadorian nationals pay only \$6.⁵

Commercial Tour Operators Fee Adjustments Proposal

Pew is supportive of an increase in commercial vehicle fees for entry and permit fees for commercial tour operators. Current rates haven’t changed since 1998. We urge the National Park Service to implement these fee increases year round.

Pew’s Restore Our Parks campaign appreciates NPS’ efforts to address its deferred maintenance challenge. While we acknowledge the need to consider a multitude of ideas to address the backlog, including increased entry fees, we do not support the agency’s peak-season entrance fee proposal. We do, however, support the permit fee adjustments for commercial tour operators.

³ “Study: More Overseas Visitors Choosing U.S. National Parks,” U.S. Travel Association, accessed November 1, 2017, <https://www.ustravel.org/press/study-more-overseas-visitors-choosing-us-national-parks>.

⁴ “Rates & Fees: Tariff Info Per Park,” South African National Parks, accessed November 1, 2017, <https://www.sanparks.org/tourism/tariffs/>.

⁵ “Galapagos Entry Fees & Documents,” Galapagos Travel Center, accessed November 1, 2017, <https://www.galapagosislands.com/travel/transportation/entry-fees.html>.

Thank you for your consideration of our comments and suggestions. We look forward to working with NPS toward thoughtful solutions to ensure our parks are adequately funded without detracting from the visitor experience.

Sincerely,

A handwritten signature in cursive script that reads "Marcia F. Argust". The signature is written in dark ink on a light-colored, slightly textured paper background.

Marcia Argust
Director, Restore America's Parks Campaign
The Pew Charitable Trusts