



201 West Main Street, Suite 14
Charlottesville, VA 22902-5065
434-977-4090
Fax 434-977-1483
SouthernEnvironment.org

December 20, 2017

The Honorable Ryan Zinke
Secretary
U.S. Department of Interior
1849 C Street, N.W.
Mail Stop 2346
Washington, DC 20240

Michael Reynolds
Deputy Director, Operations
National Park Service
1849 C Street, N.W.
Washington, DC 20240
Michael_Reynolds@nps.gov

Submitted via NPS Website, E-Mail, and U.S. Mail

Dear Secretary Zinke and Deputy Director Reynolds:

The Southern Environmental Law Center, Virginia Conservation Network, the Albemarle Angler, The Clinch Coalition, Friends of the Rappahannock, Hampden-Sydney College Fly Fishing Club, James River Association, New Virginia Majority, Piedmont Environmental Council, Potomac Appalachian Trail Club Southern Shenandoah Valley Chapter, Potomac River Smallmouth Club, Rappahannock League for Environmental Protection, Rockbridge Area Conservation Council, Shenandoah National Park Trust, Shenandoah Riverkeeper, Shenandoah Valley Battlefields Foundation, Shenandoah Valley Network, South River Fly Shop, Trinity Presbyterian Earth Care House Church, Virginia Bicycling Federation, Virginia Chapter of the Sierra Club, Valley Conservation Council, Virginia Outside, Virginia Wilderness Committee, Wild Virginia, and The Wilderness Society write to express our concerns and opposition to the National Park Service's proposal to increase entrance fees at 17 national parks, including Shenandoah National Park in Virginia. This broad and varied collection of conservationists, including environmental, community, religious, and historic preservation organizations, recreation groups and anglers, and local businesses, all share the concern that this proposal is likely to limit access to our nation's parks for many Americans and reduce visitation, in turn shrinking local economic benefits from tourism and recreation. While, according to the agency, increased fee revenues would be used to address the deferred maintenance backlog, there are more reasonable, effective ways to reinvest in our parks and repair that backlog. This misguided proposal should be abandoned.

If approved, this proposal would increase the Shenandoah National Park entrance fee from \$25 per vehicle to \$70 per vehicle during peak season. This would come directly following a phased fee increase our park undertook over the past two years, which moved the fee from \$15 to \$25.

Many eastern parks, including Shenandoah, are located near local communities with strong connections to their neighboring park lands and are within a day's drive of millions of Americans who are frequent visitors. As a result, a large number of visitors to Shenandoah spend only a day or a portion of a day in the park. While the National Park Service has argued that \$70 for a week's pass is an excellent deal for a family vacation, we believe this fee would erect a substantial barrier to entry for many Americans using it as a day pass.

Not only will this excessive fee limit access to our nation's public lands, it would also adversely impact the local gateway communities for which public lands, including Shenandoah, act as a strong economic driver. Visitors to Shenandoah National Park spend \$90 million annually in gateway communities. If increased park entrance fees result in a downturn in visitors, the ripple effect to gateway economies can be the difference between maintaining livelihoods and closing up local businesses. We witnessed the economic significance of national parks to local communities in 2013, when the government shutdown closed national parks for nearly two weeks, hitting local businesses hard.

More broadly, outdoor recreation generates significant economic benefits in Virginia and the Southeast, and parks and other public lands play an important role in providing opportunities for outdoor recreation. In Virginia alone, outdoor recreation generates \$21.9 billion in consumer spending, 197,000 Virginia jobs, \$6.5 billion in wages and salaries, and \$1.2 billion in state and local tax revenue.¹ Across the Southeast, from the mountains to the coast, there are numerous parks and historic sites managed by the National Park Service. We believe this fee increase could set a harmful precedent for access to and management of parks and other public lands across our region. Deferred maintenance in national parks is an issue that should be addressed. However, placing the burden of repairing our parks on park visitors, to the detriment of local economies, is misguided. This proposal is particularly troubling as it occurs in the context of other Administration proposals to decrease important federal funding and engagement in conservation and environmental programs.

Moreover, this proposal would make only a modest reduction in the maintenance backlog, yet exorbitantly increase fees for visitors. There are numerous, more reasonable alternatives to address the deferred maintenance backlog. One such proposal is the National Park Service Legacy Act, which Senators Mark Warner (D-VA) and Rob Portman (R-OH) introduced last spring. An identical bipartisan companion bill was introduced in the House. The Legacy Act would establish a federal fund to provide dedicated annual resources to restore national park infrastructure. Funds would be drawn from revenue from oil, gas, coal, and other mining not currently allocated to other programs. As opposed to the \$70 million/year in additional revenues that *may* be realized via the proposed entrance fee increase, the Legacy Act would invest \$50 million/year in repairing national park infrastructure for the next three years; \$150 million/year for the three years following that; \$250 million/year for the next three years; and \$500 million/year for 20 years after that. Moreover, the fund would promote public-private collaboration by prioritizing projects supported by private philanthropy. This level of financial commitment, levied from within the government framework and providing greater funding from

¹ Outdoor Industry Association, *The Outdoor Recreation Economy: Virginia*, available at https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_VA.pdf.

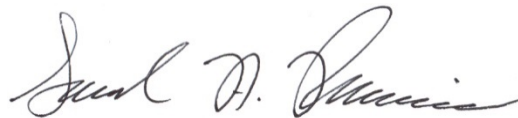
more justifiable sources, is far superior to an increase in visitor entrance fees to address the deferred maintenance backlog.

Another proposal advocated by national park supporters is to direct a portion of the Administration's proposed \$1 trillion investment in our nation's infrastructure to national parks. This makes good economic sense: for every \$1 invested in national parks, \$10 are infused back into the national economy.

While we believe this proposal should be withdrawn now, if this administration insists on further considering it, more information and analysis should be provided, as well as additional time and opportunity for public input. While the NPS did extend the comment period past the original Thanksgiving deadline to December 22, this will still be insufficient for the development and distribution of the information needed to enable the public and localities to submit well-informed, meaningful comment. In previous efforts to *moderately* increase fees, the process was spread out over a seven-month period with roundtables and public meetings. The public deserves additional data and explanation of the basis for the claimed additional \$70 million/year in revenue, the effect of the fee hike on access for all Americans, consequences for local communities, and the overall plan, beyond this fee hike, for reinvesting in our national parks. Without information regarding the potential impacts on gateway communities and impact on annual visitation, it is not possible to provide fully informed comments on this proposal.

In summary, we oppose this proposal to increase entrance fees to Shenandoah National Park and 16 other American parks. We ask that you consider American families, gateway communities, and all park supporters, abandon this misguided proposal, and work proactively to identify other solutions to the deferred maintenance backlog.

Sincerely,



Sarah A. Francisco, Director, Virginia Office
Emily Wyche, Associate Attorney
Southern Environmental Law Center
201 West Main Street, Suite # 14
Charlottesville, Virginia 22902
(434) 977-4090

Mary Rafferty
Executive Director
Virginia Conservation Network

John Schablein
Head Guide
Albemarle Angler

Annie Jane Cotten
Program Director
The Clinch Coalition

Bryan Hofmann
Program Manager
Friends of the Rappahannock

Dylan Bomeisler
President
Hampden-Sydney College Fly Fishing Club

Adrienne Kotula
Government Affairs and Policy Manager
James River Association

Quan Williams
Policy Director
New Virginia Majority

Chris Miller
Executive Director
Piedmont Environmental Council

David Bennick
President
Potomac Appalachian Trail Club – Southern Shenandoah
Valley Chapter

Herschel Finch
Conservation Chair
Potomac River Smallmouth Club

Phil Irwin
Vice President and Founder
Rappahannock League for Environmental Protection

Barbara L. Walsh
Executive Director
Rockbridge Area Conservation Council

Susan R. Sherman
Executive Director
Shenandoah National Park Trust

Mark Frondorf
Shenandoah Riverkeeper

John Hutchinson
Conservation Director
Shenandoah Valley Battlefields Foundation

Kate Wofford
Executive Director
Shenandoah Valley Network

Kevin Little & Thomas Lawhorne
Co-owners
South River Fly Shop

Pat Churchman
Trinity Presbyterian Earth Care House Church

Champe Burnley
President, Board of Directors
Virginia Bicycling Federation

Kate Addleson
Director
Virginia Chapter of the Sierra Club

William B. Snow
Chairman, Board of Directors
Valley Conservation Council

Tee Clarkson
Owner
Virginia Outside

Mark Miller
Executive Director
Virginia Wilderness Committee

Misty Boos
Director
Wild Virginia

Jill Gottesman
Southern Appalachian Region
The Wilderness Society