National Park Service
Planning, Environment, and Public Comment
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National Park Service
Department of the Interior
1849 C Street, NW
Washington, DC 20240.

Re: David H. Smith Conservation Fellows Comment Opposing “Targeted Fee Increases at Parks to Address Maintenance Backlog”

Dear Acting Director Michael T. Reynolds

Thank you for the opportunity to comment on the proposed “Targeted Fee Increases at Parks to Address Maintenance Backlog.” We are a group of David H. Smith conservation research fellows; as conservation scientists we value the protection of national landscapes for historic, cultural, scientific, and conservation value, and we submit this comment to assist you in the review process.

Americans love their public lands. Over 330 million recreation visits were recorded by the National Park Service in 2016 — the third year in a row of record-breaking visits. Americans have also expressed their support for public lands through public comments. Earlier this year the Department of the Interior solicited public comments on 27 National Monuments proposed for review: according to regulations.gov they received over 2.8 million public comments. Two analyses concluded the overwhelming majority of these comments supported the National Monuments. The Center for Western Priorities analyzed a small representative sample (n=500) of all comments and found 96% expressed support for national monument designations. The Natural Resources Council of Maine examined all 192,067 comments that mentioned the Katahdin Woods and Waters Monument: 99.96% of these supported the national monument. Clearly, the American public is invested in their public lands.

We believe that the targeted fee increases currently proposed for review are a misguided idea. They will reduce access to public lands and disproportionately impact economically disadvantaged segments of the American public. National Parks belong to all Americans; these landscapes provide opportunities for recreation, education, conservation and research, and they should remain accessible to all Americans.

As conservation scientists, we know that early experience outdoors and time in public lands can help increase people’s care for and connection to the natural world. But, since the 1990s there has been a well-documented decline in Americans’ direct contact with nature, with negative implications for our physical and mental health. Despite the recent surge in visitation at National Parks, Americans today spend less time outdoors than previous generations. We must increase, rather than decrease, opportunities for people to experience the natural world. Increasing the expense associated with visiting National Parks will
exacerbate the current loss of human-nature interactions and the associated mental and physical health benefits that individuals derive from outdoor activities.

The entrance fee increase would disproportionately affect people already underrepresented in outdoor recreation and conservation science and would contradict current National Park Service policy of promoting a more diverse visitorship to National Parks. A National Park Service study of the racial and ethnic diversity of National Park Service visitors from 2008-2009 discovered that over three-quarters (78%) of visitors are white. While non-white people comprised over 37% of the United States’ general population, they represented only 22% of park visitors at that time. By contrast, the Bureau of Labor Statistics “A Profile of the Working Poor, 2015” found that black and hispanic families were more than twice as likely as whites to be among the working poor. One goal of the National Park Service’s 2016 Find Your Park campaign was to connect underrepresented groups with National Parks. During this campaign, the National Park Service explicitly recognized the importance of reaching a younger and more diverse audience to create opportunities for access and build the public support necessary to sustain public lands into the future. Scientific articles have revealed the importance of cost, access to transportation, distance, racial bias, and knowledge in the disparity of racial composition of Park visitors. The National Park Service seems to be aware of the evidence for disparity in visitation and the challenges of expanding access to minority groups and we applaud the steps that have been taken through campaigns like Find Your Park. However we fear that this proposed fee increase may compromise the substantive effects of this campaign on minority communities, essentially reversing those efforts.

We absolutely agree that the deferred maintenance backlog of the National Park Service should be addressed. However, it is disingenuous to propose solving this backlog via entrance fees while dramatically cutting funding for the agency. President Trump’s proposed budget reduces the Park Service budget by 13 percent, the largest cut to the agency since World War II. Under this budget, the National Parks as a whole would lose $400 million in fiscal year 2018. In effect, the increased fees move toward a user-payer model that both diminishes public sense of ownership and accentuates disparities in access to our most popular parks. Further, we are strongly against making up the funding discrepancy though an increase in extractive activities in the parks, as has been suggested by some lawmakers. Such acts are not compatible with the core mission and values of the National Park Service. For all these reasons, we believe that the National Park Service budget should be restored, or even increased, and the proposed fee increase eliminated.

Respectfully submitted,
Dr. Becky Barak, current Smith Fellow
Dr. Caitlin McDonough MacKenzie, current Smith Fellow
Dr. Molly Bletz, current Smith Fellow
Dr. Diogo Veríssimo, PhD
Dr. Meredith Holgerson, current Smith Fellow
Dr. Mariah Meek, Assistant Professor, Michigan State University
Dr. Sara Kuebbing, Assistant Professor, University of Pittsburgh
Dr. Jacqueline Grant, PhD
Dr. Sara Kross, PhD
Dr. Mallika Nocco, current Smith Fellow
Dr. Cully Nordby, Associate Director, University of California Los Angeles
Dr. Pete McIntyre, PhD
Dr. Sean Anderson, PhD
Dr. Ashley Smyth, PhD
Dr. Erika Zavaleta, PhD
Dr. Julian Olden, Professor, University of Washington
Dr. Michael Bogan, Assistant professor, University of Arizona
Dr. Stephanie Green, Science Fellow, Stanford University
Dr. Talia Young, current Smith Fellow
Dr. David Gill, current Smith Fellow
Dr. Karen Goodell, Professor, The Ohio State University