



November 30, 2020

Attn: Tamara Delaplane
Second Century Campground Strategy
Denver Service Center
National Park Service

Submitted to <https://parkplanning.nps.gov/CampgroundGuide>

Dear Friends:

The National Park Hospitality Association greatly appreciates the opportunity to offer comments on the document entitled **National Park Service Campground Development Guidelines – External Review Draft, September 30, 2020**. As the long-time partner of the agency in serving park visitors – including campground operations in many units – the national park concessions industry has both experience and perspectives that can contribute to the continuation of camping as a valued and core park activity long into the future. We are excited about the future of camping in our national parks for generations of Americans ahead.

The Guide document contains an excellent and important recounting of the origins of and importance of camping as a key in-park activity. NPHA offers its strong support for continuing quality, affordable and aesthetic camping opportunities in parks and the robust park experiences made possible via in-park campsites. We recognize the value of diversity in national park camping opportunities: developed sites, backcountry sites, and differing levels of comfort, responding to camping party preferences. We also believe that campgrounds in national parks should not have some of the popular features found in campgrounds outside parks – national park campgrounds should focus on the features of the parks in which they are located.

The Guidelines document tells a marvelous story of national park campground design and operation over nearly a century, a story reflecting the expanded use of personal vehicles to travel across the nation and to visit shared legacies including parks. This has been an important factor in creating the love Americans have for our parks and related outdoors areas. Like park lodges, park campgrounds are wonderful examples of respect for these special areas and of pursuit of compatible enjoyment and protection. This connection between design and park experiences has produced generations of cherished memories and wonderful connections made among campers from varying regions, ethnicity, age, and backgrounds. Unlike in hotels and other overnight accommodations even in gateway communities, national park campgrounds encourage interaction, conversations and sharing among visitors – including food. This combination of vision and appropriate actions, including hardening of small areas to host visits and design of facilities to shape activities, should continue.

Campgrounds in national parks have a history of expansion mirroring our nation's population growth, including through the Mission 66 efforts of the mid-1900s. But that growth has been interrupted recently, and that concerns NPHA. We are concerned by NPS data that shows a notable decline in overnight camping over the past three decades and by anecdotal information that suggests that the current inventory of campsites in park units. Until very recently, information on national park campsites was poorly documented nationally. We applaud the work of the agency to change that and recognize

the report on campgrounds shared with the National Park System Advisory Committee in early 2020, and in progress reports on these campgrounds by CHM and CBRE. We believe, based on anecdotal information from key parks, that there has been a decline from the overall number of campsites in park units over the same three-decade period.

NPHA members with experience in the operation of national park campgrounds will be sharing comments on the specific design guidelines offered in the document. As an association, we offer general support for the content of the Guidelines document and its suggestions for accommodating current demand, ranging from sites capable of hosting modern vehicle dimensions to reflecting contemporary visitor expectations, as well as underscoring the importance of universal design. We do believe that improvements to national park campgrounds are important – from modern restrooms to management of vegetation to allow safe access to campsites. Yet we believe that our primary contribution to the Guidelines document rests in our expertise in national park hospitality management and operations practices, and the need to insure that design guidance provides the capability to meet evolving demand and continuation of public/private cooperation in serving park visitors.

Careful attention to design is important, but a focus only on design can be constraining if key trends are not accurately identified and without ongoing visitor monitoring and adaptations to accommodate contemporary expectations and technology advances.

We offer the following topics as meriting your review. We further suggest discussions with us and others with insights into contemporary campground use and future outdoor recreation trends as you continue to plan for the future of campgrounds in national parks:

- 1) We support modern bathrooms, widespread broadband connectivity and universal ADA compliance for campsites in NPS developed campgrounds, and urge use of newly available GAOA funds to eliminate all deferred maintenance at NPS campgrounds;
- 2) We support use of www.recreation.gov and other systems to enable advance reservations of campsites in national parks. On-line reservations are more commonplace within other contemporary public and private campground systems than in national park units. In addition to providing means to assure visitors of site availability, reservations reduce crowding and access disruptions seen at several campgrounds this year utilizing “first-come” systems. A reservation system can also prevent arriving campers from being forced to utilize a campsite inappropriate for their intended style of use. Reservation systems can also facilitate utilization of dynamic pricing to encourage use of non-peak periods, achieving better utilization of public assets;
- 3) We support increased options for campground visitors in national parks, including an increase in campsites offering electrical hook-ups and water utility service. Sites offering these features are among the most popular at campgrounds currently operated by concessioners, regularly achieving 100% reservations far in advance. We have proof of the importance visitors place on clean and modern showers and laundries and RV dump stations, and of the efforts needed to actively manage these facilities;
- 4) At state park and private campgrounds across the nation, demand is high for simple alternative accommodations to visitor-provided tents and RVs. There is strong evidence that these options assist in expanding diversity of NPS use, enabling enjoyment by those without camping equipment. We also believe that availability of simple hard-sided structures can extend the season of use and provide additional safety in wildlife-sensitive areas. These accommodations are consistent with increased household urbanization in our nation and widespread multi-modal travel, where transport of traditional camping equipment can be costly and challenging;

- 5) We support strong consideration of use of conservation corps to construct simple, enduring structures, paralleling the work of CCCs in the 1930s, supplemented by solutions provided by concessioners provided under concessions contracts;
- 6) National park campgrounds should seek to meet demand for campsites accommodating extended families and other larger groups. As with sites offering utility services, concessioner-operated campgrounds demonstrate demand for these options exceeds current supply;
- 7) Campgrounds in national parks can and should provide easy access to key supplies from ice to firewood to bulk drinking water, and from insect repellent to suntan lotion to simple food items. We also support rentals within campgrounds of bear spray, camp chairs, tents, cots and more. This can be done by concessioners at both NPS- and concessioner operated campgrounds and can utilize innovative, mobile solutions that do not require extensive capital investments;
- 8) We support reestablishment, improvements, and expansion of amphitheater/pavilions in national park campgrounds. These facilities can serve multiple purposes, from education and learning to guidance regarding lesser known park features and activities; they can host docu-dramas with food options; and be a forum for creating awareness and access to concessioner and CUA services – from river trips to fishing, wildlife photography to rentals of kayaks and bikes;
- 9) We applaud the consideration in the Guidelines of alternative arrivals by campers, including via bicycles and buses. There are other transportation-related considerations that should also be explored, tied to growth in TaaS (Transportation as a Service) and ranging from trams to self-driving, on-demand vehicles. There is an opportunity for park campgrounds to learn from destination ski resorts, which have successfully reduced needed parking spots for visitor parties from 3+ (at housing, recreation sites, stores and restaurants) to 1+ (primarily housing) with important environmental and traffic congestions benefits.
- 10) We urge NPS to incorporate in this document an appropriate and conservative goal for expanding campground capacity that mirrors the nation's overall population growth: a 10% growth in campsites over the next 10 years. Major campground renovations and new campgrounds are excellent candidates for achieving this goal. We would suggest that achieving this important goal might require flexibility in the campsite size recommendations, which are generous when compared to most top-quality public sector dimensions. In all but peak season periods, though, campsite density could be reduced by selective blocking of sites in the reservation system.

We appreciate the opportunity to share these comments and suggest that additional forums for sharing comments. Concessioners have insights into the experiences of a large proportion of all park visitors and can share general information on visitor sentiment as well as gather more focused information to support nimbleness in agency decision-making.

Outdoors, as in our homes and offices, the world is fast changing. From SaaS in our computers and related devices to IoT, TaaS like Uber and self-driving cars, climate change, and health considerations are significantly changing our activity patterns. New flexibility in our schedules, diminishing the constraints of seasons and days of the week, will compound the pace of these changes. We look forward to cooperative, real-time sharing of ideas and data to make every park visit cherished. We invite you to join us in discussing lessons from current operations at airports, for example, where airlines provide information on passenger arrivals and departures to TSA, concessioners and others to help customize staffing and to innovative ways businesses from ski areas to theme parks are enhancing visitor

experiences with technology delivering better information, instant feedback channels, new services like photo documentation of key memories and improved distribution of visitation.

We recognize that NPS has efforts underway to investigate the financial aspects of campground operations. We believe that pricing of camping services can cover much of the needed campground investment as well as operations and maintenance costs, and that this strategy is important to campground businesses operating outside parks but serving many park visitors. Campgrounds in national parks should remain a hybrid model of public/private partnership. In many cases, short seasons and limited revenues from campsites cannot repay all required capital investments but can support operating costs. Revenues from campground operations can also contribute to sustainable NPS staffing for vital roles including interpretation, law enforcement and emergency services. NPHA believes that many functions of campground operation, including reservations management, fee collection, public facility maintenance and cleaning, waste management and sales/rentals of recreation goods and services in campgrounds are neither appropriate nor priority NPS services but will strongly advocate for no reduction in agency staffing associated with campground visitor services, urging that agency staff should instead provide priority agency functions at these sites.

Thank you for your consideration of your views and our request for ongoing discussion about national park campground design and operations.

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