



American Recreation Coalition

*Dedicated to the protection and enhancement of everyone's right
to health and happiness through recreation.*

February 1, 2010

U.S. Forest Service
Attn: Carolyn Holbrook
Recreation and Heritage Resources Staff
1400 Independence Avenue, SW., Stop 1125
Washington, DC 20250-1125

**Subject: Proposed Directives for Forest Service Concession Campground Special
Use Permits: Federal Register / Volume 229k, No. 74, December 1, 2009**

Dear Carolyn:

The American Recreation Coalition welcomes the opportunity to provide comments on the proposed directives governing permits for operation of campground and related Granger-Thye concessions as published in the Federal Register on December 1, 2009.

The Forest Service campground concession program is a remarkable success, offering millions of Americans an opportunity to enjoy our shared legacy of national forests and other public lands. A high percentage of overnight camping in national forests is now at sites operated by private businesses under concessions and permits, and the evolution to this system since the early 1980's has provided better services, improved campground infrastructure and operations during shoulder seasons of the year when National Forest campgrounds traditionally closed, when seasonal hiring authority expired. The logic behind the growth in concessioner campground operation is clear. First, campground operation is not an inherently governmental function, and thus a partnership with private sector providers is appropriate. Second, the cost of operations by the private sector is often substantially less than if operated directly by the Forest Service. Third, and perhaps most importantly, the concessioners operating National Forest campgrounds engage in marketing and promotion which has boosted occupancy at these facilities, gaining more value from the invested public funds.

Concessioners are managed and overseen by the Forest Service to assure that the campground operations are fair and equitable to all campers and visitors to associated day use areas. The American public benefits greatly from the Forest Service campground concession program.

To continue this partnership and to continue to deliver benefits to the public, the conditions of the concessions must reflect standard business practices on pricing and discounts. Instead, changes over the past decade driven by social policy, not the business agreement represented in the concessions contract, have placed increasing burdens on the campground concessioners. In addition, the changes in requirements

regarding discounts for certain portions of the public have been inconsistent from forest to forest – and even from district to district – and have thus caused confusion with the public and even irritation by some towards campground concessioners.

This organization played a central role in the development of the so-called fee demo program and in the resulting Federal Lands and Recreation Enhancement Act. We also played a role in the Congressional action which changed the America the Beautiful Pass from completely free to a one-time charge, encouraging those receiving the pass to retain and safeguard the pass. The legislative history of these legislative actions will clearly demonstrate that there was no intention to apply discounts for seniors or those qualifying for the Golden Access Pass to concessioner-operated campgrounds. This is exactly comparable to the treatment of businesses providing accommodations and day-use recreational services elsewhere on national forests – like lodges, ski areas and rafting trips – or treatment of businesses operating on national park lands.

We do support honoring Golden Eagle passes and America the Beautiful Passes for seniors in the spirit of the original Land and Water Conservation Fund provisions – principally for access. In addition, we know that concessioners operating National Forest campgrounds do widely offer discounts to seniors that are reflective of industry normal practices for members of AARP and under other senior discount programs. In fact, there are several senior discount programs commonplace in the campground field and we anticipate that concessioners are and will be offering these discounts. We therefore support the proposal for requiring a 10 percent discount on camping fees for holders of Senior and Access Passes and Golden Age and Golden Access Passports.

ARC further supports the proposal for a 10 percent discount to holders of Senior and Access Passes and Golden Age and Golden Access Passports at standard amenity recreation fee day use sites operated by concessioners on behalf of the Forest Service and also supports free use to holders of Annual and Volunteer Passes at standard amenity day use sites.

Finally, we believe it is appropriate for any newly-mandated discounts to be postponed until a new concessions contract or permit is issued or an existing agreement is renewed.

We intend to draw together the campground and day use concessions operators and permittees and representatives of leading organized recreation organizations to discuss ways to increase utilization of campgrounds and other recreation infrastructure in our National Forests to spread the significant benefits realized from healthy, active fun in the Great Outdoors. We are certain that the outcome of this conversation will be better utilization of public investments and special savings opportunities for those visiting our public lands mid-week and during non-peak periods.

Sincerely,

Derrick A. Crandall

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President