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 should 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

President