



September 18, 2020

Commercial Services Program
National Park Service
1849 C Street, N.W., Mail Stop 2410
Concessions Contracts Revised Rule Comments
Washington, D.C. 20240

RE: Comments on National Park Service Proposed Rule: Commercial Visitor Services; Concession Contracts. Regulation Identifier Number (RIN) 1024-AE57.

The RV Industry Association (RVIA) offers the following comments in response to the National Park Service's (NPS) proposed revisions to regulations governing the solicitation, award, and administration of concession contracts to provide commercial visitor services at NPS units to reduce administrative burdens and expand sustainable, high quality, and contemporary concessioner-provided visitor services in national parks.

RVIA is the national trade association representing the diverse manufacturing businesses which together build more than 98 percent of all RVs produced in the United States—including motorhomes, travel trailers, fifth-wheel travel trailers, folding camping trailers, park model RVs, and truck campers. We are the unifying force for safety and professionalism within the RV industry and work with federal and state policymakers to promote and protect the RV industry and its members.

We applaud the recent efforts to modernize NPS regulations governing concession contracts for three reasons. First, the demographics of the next generation of campers are changing and so are expectations of RV campers and the amenities they need. Second, addressing the recreation infrastructure deficit and bringing America's public lands outdoor recreation infrastructure into the 21st century to meet these changing expectations will require robust and creative collaboration across the public and private sectors, including innovative public-private partnership models. Third, current limits on how NPS can partner with concessioners and recreation service providers reduce opportunities to collaborate and modernize infrastructure. We discuss each of these items in more detail below.

New Generation of NPS Consumers and Facility Expectations. The demographics of the next generation of campers are creating a shift in expectations and uses of RV campgrounds. Research shows a growing number of consumers who enjoy outdoor recreation also want modern, full-service amenities. They prefer to use digital means to access reservations, schedule activities, obtain equipment, and share their experiences with friends and loved ones. Additionally, more RV accessible campsites are needed to keep up with the growing demand for RV camping.

In a recent survey of more than 2,000 RV owners, 98 percent of RVers believe the NPS campgrounds need to be repaired, updated, reopened, and/or modernized. Additionally, 85 percent of respondents supported the use of partnerships to accomplish these repairs and improvements.

Federal campgrounds must meet those expectations and become a more vibrant source of recreation experiences for current and future generations to enjoy and protect.

Importance of Implementing New Models for Campground Modernizations, Including Public-Private Partnerships. RVIA has been a longtime advocate for removing barriers to and encouraging the expansion of suitable public-private partnerships and concessioner services to address the need for campground modernization and expansion on public lands. These partnerships recognize that private capital and industry expertise can augment public investment and strengthen the management of major infrastructure projects and outdoor recreation assets, thereby improving the RVer/visitor experience on public lands.

Without these important improvements, limited RV camping opportunities at NPS campgrounds will persist. This is one of the primary reasons why the RV industry continues to support common-sense solutions to campground modernization, including encouraging the expansion of public-private partnerships and concessioner services where appropriate.

Current Barriers to Robust and Creative Collaboration Across the Public and Private Sectors. Limitations on how NPS can partner with concessioners and other recreation services permit holders reduce opportunities to collaborate and modernize facilities. In many cases, permits and contracts are too short for concessioners to recoup much-needed investments in improving the facilities they manage. NPS should allow concessioners longer permit periods to strengthen incentives for them to invest in critical infrastructure enhancement. These partners should have more flexibility to implement best practices to improve revenue generation and recreation site maintenance and modernization. While modernization is vitally important, campground fees in national parks should remain reasonable and competitive so all Americans can enjoy our shared iconic lands.

When partnerships between private industry, such as experienced campground operators, and the federal government are discussed, there can be confusion about whether this specific model is the “privatization” of federal lands. It is not. What these partnerships do allow is for campground improvements and modernization to be made with private investment and critical volunteer services that are subject to government oversight. Partners can slowly recoup their investments over time without draining federal resources that are thin or not available.

These partnerships are a sensible, proven way to bring public land infrastructure into the 21st century, ensuring the federal government remains the owner of all public lands and preserving access and enjoyment of federal campgrounds for current and future generations of RVers to come.

RVIA appreciates consideration of these comments on the proposed rule and welcomes the opportunity to serve as a resource in this endeavor.

Sincerely,



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