



POTOMAC APPALACHIAN TRAIL CLUB

www.patc.net

November 17, 2017

National Park Service
Recreation Fee Program
1849 C Street, NW, Mail Stop: 2346
Washington, DC 20240

Comment on Peak Season Entrance Fee Proposal

To All Whom It May Concern:

The Potomac Appalachian Trail Club (PATC) appreciates this opportunity to comment on the proposed fee increase for peak season use at 17 National Parks. We believe the new fees will be bad for our members, for the public, and for the parks themselves, so we write to share our hope they will not be implemented.

PATC was founded 90 years ago this month to build the Appalachian Trail; PATC's founders laid out the path for the Trail in what is now the Shenandoah National Park (SNP). Ever since then, our Club has been a lead player in maintaining this trail and hundreds of miles of other trails in our region; in promoting outdoor education and activity; and in working constructively with a variety of esteemed partners in these missions – SNP notable among them. Through the efforts of thousands of dedicated volunteers, PATC works with SNP on programs and trail support. This year we performed more than 28,000 hours of volunteer service in, or in support of, SNP. We additionally have a unique partnership through which we provide upkeep and the rental management of six SNP rustic cabins that are open to the public, along with a dozen PATC-owned cabins nearby that can be rented by park visitors. We have been a partner of the SNP since its beginning. (PATC also performs volunteer support in 12 other national parks.)

We are concerned by the National Park Service's proposal to nearly triple entrance fees at 17 national parks, including SNP. Our members have been reaching out to the Club's leadership and me at events and meetings; from what I have heard, they are uniformly worried that this proposed fee increase will hurt the Park and its visitors.

We will let others comment on the national impact of the proposed increase, while we can testify about its effect on SNP and our 7,700 members. We hear our members when they say that \$70 is an amount greater than virtually any other recreational attraction in the area, including most amusement parks. It is hard to understand how such a fee is appropriate for a "public" and "national" resource that belongs to and is intended for use by all of the people.

We also are fielding questions about why SNP is included in the fee increase at all. Shenandoah is not a top park in popularity like Yellowstone or Yosemite. In 2016, SNP had 1,437,341 recreational visits. That ranks it 58th in all national parks. By contrast, Volcanoes National Park in Hawaii had 400,000 more visitors, but its fee is not on the list of those that would have increases.

Here are our specific concerns about your proposal:

- This fee increase came out before we were aware it was being considered, with an abbreviated comment period, and with no public hearings. A change this significant deserves full public discussion.
- This dramatic increase will particularly fall on first time and occasional park visitors who are less likely to have a season pass. These first time visitors are the people the parks need to win over with positive experiences that will make them repeat visitors – and in some cases, the kind of volunteers who do so much important work in the parks.
- The vehicle-based fee structure is unfair. A car costs \$70, whether it has one passenger or seven. A motorcycle, which can only bear one or two people, costs \$50. But the greatest cost per person may be paid by the very people who have the least negative impact on the park's infrastructure, those arriving by bicycle or on foot. At \$30 each, a group of five hikers would spend more than twice as much to enter the park as they would if they were driving together in a car.
- The backlog of park maintenance issues has arisen over time because our elected officials have underfunded the National Parks for years. Park visitors and potential future visitors did not cause the backlog; why should they be expected to foot the bill?
- We are not convinced that the fee increase will generate significant revenue for SNP. But even if it does, this policy could have negative side effects. It will hurt local economies, motivate illegal entry and disrespect for Park regulations, cause problems for adjoining landowners who will have to deal with increased trespassing, change use patterns at nearby cost-free parks and forests, and overwhelm small parking lots at the park's periphery where no fee is collected.
- The stated goal of the fee is to support work at the targeted parks. It is likely that when faced with a \$70 one time entrance fee, many visitors would consider the all-parks \$80 America the Beautiful annual pass as a preferable option. The majority of the revenue from the annual pass goes to the park that sells it, not the park where it is used. The annual pass is also available online. SNP would receive little from those who buy their passes elsewhere.

While we do a lot of work in the SNP, we are headquartered near Washington, D.C., in Vienna, Virginia. As a friend and partner of the National Park Service, we would be glad to meet with you to discuss our concerns further. Our club is also eager to work with SNP staff and management to address concerns about park maintenance. We are confident we can help. Meeting shortfalls with volunteer labor in lieu of a huge fee increase would seem to be consistent with the ethic of the national parks, and with the goals of our government.

I appreciate this opportunity to share PATC's concerns and those of our members. We hope that the proposal – which seems antithetical to the purpose of our great national parks – will be withdrawn.

Sincerely,



James F. Tomlin
President