

Response to Proposed Directives for Forest Service Concession Campground Special Use Permits (FR E9-28744) - January 27, 2010

Sixteen-years ago my wife, Suzanne, and I began our U.S. National Forest Campground Guide project. We have visited 155 national forests, 9 national grasslands, and personally surveyed over 2,383 developed campgrounds with ten or more designated campsites. Suzanne and I have been recognized as a source for quality national forest and grassland campground information by the New York Times, USA Today, Good Sam's Highway magazine, the Forest Service, and many others, including U.S. Representative Gabriella Giffords. The project continues. *This response supplements that provided by Suzanne Dow, dated January 17, 2010 (FR Tracking No. 80a7eca5).*

The Proposed Directives (Notice)¹ for Forest Service Concession Campground Special Use Permits, E9-28744, requests the Senior (Golden Age) and Access (Golden Access) discounts be reduced from 50% to 10% for campgrounds and related Granger-Thye concessions. The following, in addition to the points established in Suzanne's piece, are reasons that make it difficult for me to support such action:

1. Implementation of this directive would be a **breach of faith** to the thousands of seniors and disabled who obtained the pass thinking its provisions, e.g., 50% fee discount, would be valid for their lifetime. As discussed in Suzanne's piece regarding the economic impact on seniors, so many of them have lost their pensions and seen their investment portfolios reduced to ashes, that even \$1 or \$2 in higher fees does make a difference. This also applies to the disabled who are experiencing reduced benefits especially in health care.
2. Considering the negative impact of reducing the fee discount on the **disabled**, who like many seniors, are just squeezing by in the best of times. Worse, how about the message being sent to **disabled veterans**? It is inconceivable to me that this benefit would be taken away from veterans who, for example, had a leg blown away serving our country. We owe all our veterans, especially those who are permanently disabled, a huge debt. The Forest Service is not an unfeeling corporate entity.
3. In part, para. 1.c. of E9-28744 states: "The Forest Service is the only participating agency that requires concessioners to provide a 50 percent discount on camping fees to holders of these passes. For example, the National Park Service allows its concessioners to elect whether to honor these passes, and most elect not to honor them." **So!** Using The Park Service as an example or reason to reduce the fee discount will likely turn the stomachs of many Forest Service employees. Be that as it may, I hope the next policy change will not be to emulate the Park Service by prohibiting dogs on national forest trails. Another way to look at the Forest Service being the "only" organization offering the fee discount is it is one of the reasons that makes it such an outstanding, independent thinking group of federal employees.

We have received several email messages to include discussions on our forum requesting us to provide a list of concessionaire-operated campgrounds so they can avoid them. Our research does not include the information because it was our position (hope) that concessionaire-operated campgrounds were transparent to the camping public. So much for that philosophy!

¹Federal Register, dtd, December 1, 2009

For years, concessionaires have been complaining about the senior and disabled fee discounts. Finally, they, probably through the National Forest Recreation Association (NFRA)², have convinced the Forest Service to do their bidding. The NFRA strategy seems to be let the Forest Service strong-arm the public into thinking seniors and disabled are the means by which the alleged concessionaire deficits will disappear. And what will this do for the camper, all campers no matter the age? I suspect very little.

Like the Forest Service, most concessionaires don't advertise or promote "their" national forest campgrounds and other recreational facilities to increase occupancy/participation levels. It's as if they think people are just going to fall into their laps by default. But wait a minute, let's get the Forest Service to increase our revenue levels without increasing visitation and investment. WOW, what a deal! It is time concessionaires grow up and behave like business entrepreneurs.

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² Should be re-named the "National Forest Concessionaire Association" (NFCA)