

**Response to Proposed Directives for Forest Service Concession Campground Special Use Permits (FR E9-28744) - as of January 5, 2010**

by Suzanne Dow

Sixteen-years ago my husband and I began our U.S. National Forest Campground Guide effort. We have visited 155 national forests, 9 national grasslands, and personally surveyed over 2,383 developed campgrounds with ten or more designated campsites. Fred 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 Proposed Directives (Notice)<sup>1</sup> 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<sup>2</sup> concessions. The following are points that make it difficult for me to support such action:

1. In the above statement, do "campgrounds and related Granger-Thye concessions" refer to both concession and non-concession operated campgrounds? Applying the proposed reduction to only concession operated campgrounds, which constitute less than half of the developed campgrounds in the Forest Service inventory, forecasts a number of bookkeeping challenges. By not applying the proposed action to non-concession campgrounds, the Forest Service is, again, helping private industry to the detriment of themselves. However, if the proposed action does apply to non-concessioned campgrounds, each campground is required by Forest Service policy to go through the Recreation Action Committee (RAC) process. If this statement is correct, what a public relationships challenge each national forest will face. This all sounds counter-productive.
2. The 50% discount may appear "steep" to the concessionaire but consider the cost benefit to the concessionaire in operating a campground designed and built by the Forest Service. The concessionaire carries no mortgage since they did not have to buy the land nor obtain financing to pay for the design or construction of the campground. Maintenance work, for such things as the interior road or the campground's facilities, is something negotiated in the contract but, from my observations, usually falls to the Forest Service. Since they do not own anything, the concessionaire pays no property taxes. And each concessionaire benefits from the nation-wide Government sponsored reservation system, known as the National Recreation Reservation System (NRRS). Private campground owners may have their own reservation system but there is no equivalent to the national reservation system for them. Also, one would be challenged to find an advertisement for a concessionaire-operated campground anywhere but one needs only to open a local phonebook to the

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<sup>1</sup>Federal Register, dtd, December 1, 2009

<sup>2</sup>Granger-Thye Act of April 24, 1950 (16 USC 572) authorizes the Forest Service to collect funds from partners to perform work that is the responsibility of the partner. Agency policy for using this authority is described in FSM 1584.12.

Yellowpages and “Campgrounds” to find a private campground in the area. What is the value of these benefits? I submit they are substantially more than the cost of honoring the current senior and access discounts.

3. If the Senior and Access discount is “non-negotiable,” as stated in FR E9-28744, what is the meaning of “Some concessioners already provide senior discounts on 25 to 30 percent or more of their camping fees. . .”? This statement suggests the discounts have been “negotiated.” Or does it mean 25 to 30 percent of the campers using concessioned campgrounds are using their discounts? If this is the case, that assumption contradicts the 11.4% given in paragraph 1.h of the Notice.
4. The National Academy of Social Insurance (NASI) reports Social Security Insurance for “the average retiree benefit is \$12,530 a year” and that this benefit replaces an average of 40% of their working income.<sup>3</sup> In light of the NASI report, the claim that non-senior low-income (combined annual income of less than \$13,000) campers are being harmed by the 50% discount, ignores the situation that seniors and the disabled find themselves in. It is apparent, no consideration was given to recent economic conditions experienced by the seniors who, like myself, saw their retirement portfolio reduced significantly. Some seniors have even lost their pensions and now must survive on just their Social Security. In other words, the 50% discount is allowing seniors to recreate and enjoy their national forests.

I submit, as a counter argument, that the cost per camper be considered. Say you have two seniors, a husband and wife, at one campsite and next to them a young family of five. The campsite fee is \$25 for the young family and, with their discount, \$12.50 for the seniors. Or, another way to look at this, the family is paying \$5 per individual and the senior’s cost is \$6.25 per person. So, who is being harmed here?

5. Under paragraph 1.a of the Notice, the following statement is made: “The program has evolved to a point where most highly developed campgrounds . . . (approximately 50% of Forest Service camping capacity, or 82% of the National Recreation Service (NRRS) are managed by concessionaires.” What are the definitions of the terms “highly developed campground” and “camping capacity.” Does “highly developed” refer to amenities and something else? For example, there are some 200 national forest campgrounds with showers. Is it being suggested these campgrounds are all concession operated? If so, that is not correct. Is “camping capacity” referring to the number of campers a campground is designed to accommodate or the quantity of campsites in a campground? It has been my observation that concessionaires prefer large campgrounds with historically high occupancy numbers and that these are the campgrounds dominating the NRRS. There are non-concessioned campgrounds in the NRRS system that do not have high occupancy and generally only fill up on holiday weekends but they are a small number of the NRRS total. Excluding the smaller, not “highly developed” campgrounds

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<sup>3</sup>“Social Security and Retirement Income Adequacy” by Virginia P. Reno and Joni Lavery, published May 2007

from the statistics cited in the above statement, skews the analysis toward a specific conclusion.

6. Yes, the number of seniors is growing. However, is “the number of seniors camping in our national forests growing” as claimed? During our 16 years of personally researching national forests and grasslands across the nation we have not observed the numbers increasing among seniors but rather a steady increase in camping for all ages.
7. It was repeated several time in E9-28744 that the 50% discount is not an “industry standard.” Over the past five years, there have be programs established by businesses that contradict this statement. Passport America, CampClub USA, and Happy Camper give their members a 50% discount on camping fees at member-participating campgrounds. The difference is their members pay an annual memberships fee.
8. Is the 25 to 30 percent senior occupancy rate given in E9-28744 based on NRRS data? What about concessionaire collected data? As a former government contractor, I know government contracts require documentation and data reporting. A concessionaire under contract to operate a Forest Service campground would have this requirement. It is my considered conclusion, the NRRS data provides a sample but that sample is too small. For an accurate sample of the camping practices for seniors and disabled in our national forests, a wider net must be cast to justify the changes proposed in E9-28744. And, how does the 25 to 30 percent occupancy rate numbers relate to “. . .the discounted senior use increased to 11.4%. . .”? Does that mean 13.6 to 18.6 percent of seniors and disabled did not use their discount? If so, it begs the question, why didn’t they?
9. The organizations listed as interviewed for the analysis of the concession industry smacks of bias. If the Forest Service persists in considering this directive it should re-do the study to also use members of the recreating community that do not have a vested interest in public land privatization. If a national forest must go through the RAC process to justify an increase in their campground fee, it is my position that concessionaires should be held to the same standard. Also, who are these concessionaires that are in such dire financial straits? The Forest Service gives a figure of 150 “permittees”while the National Forest Recreation Association (NFRA) claims a 200 figure. How can one give credence to E9-28744 when there is a discrepancy in something as basic as how many concessionaires are under contract with the Forest Service?

In July 2009, U.S. Representative Gabriel Giffords honored our work by reading our accomplishments into the Congressional Record. She made a connection between our work and the economic benefits of national forest campers to the local economy. Her numbers were based on 2003 figures but the positive influence of national forest campers on local businesses continues. In 2009, there was a push to attract more people to use public lands. To this end, all federal public lands, including national forests, waived entrance and day use fees for a few days each month during the summer. FR E9-28744 states this action, if repeated with the discounts honored, would be “detrimental to the economics of the concessions and could render many of them non-viable.” Such a statement epitomizes the shortsightedness of FR E9-28744. I submit, taking action, any action, that discourages people from visiting and using our national forest and grasslands would be “detrimental” to the long term economics of both the concessionaire and the

surrounding communities.

It has always been my opinion that national forest campers represent the Forest Service's biggest lobby. Campgrounds often provide the public with their first national forest experience. A quality experience makes an individual a lifelong supporter of the Forest Service, a lobbyist for public lands, and a lover of the outdoors. Now, consider the importance of seniors and the disabled in bringing the next generation to our national forests. Grandma and Grandpa have the time and the experience to give their grandchildren an appreciation of where Smokey Bear lives.

The senior and disability discounts have been in place for decades. Part of my confusion comes from the fact that these discounts were being honored when campgrounds were privatized and Requests of Proposals (RFP) were sent out. The concessionaires submitted their RFP bids knowing about these discounts and they should have made appropriate budget calculations. When they were awarded contracts these discounts didn't just pop into existence. To have the concessionaires now cry hardship after the fact at this time and under the current economic challenges faced by the public, appears poorly thought out and only confirms the public's view that many concessionaires are greedy.

E9-28744 repeatedly implies concession-operated campgrounds should be regarded as privately owned campgrounds but such a comparison is seriously flawed. Concessionaire-operated national forest campgrounds were built with *public* funds on *public* lands. Private campgrounds are not. The concessionaire does not have the same financial or emotional investment in the campground they are contracted to operate as the private campground owner. Unlike the owners of private campgrounds, concessionaires often rely on the government for a certain amount of the campground's infra-structure work. For example, the removal of a downed tree in a private campground is not performed by a Hot Shot crew needing to practice their chainsaw skills.

Frankly, we couldn't have provided the public with our U.S. National Forest Campground Guides, a single source of complete and comprehensive information for national forest developed campgrounds, without the help of our senior discount. We undertook our project so the public could know about these wonderful places called national forests and grasslands just waiting for their discovery. Based on the claims presented in E928744 and what I believe would be the impact on the public with the loss of the senior and access discounts of 50%, I can not support the proposed action.

More than a 150 years ago some wise people made the concept of public lands a reality. With the establishment of public lands, there was a promise made to the citizens of the United States of America that their lands would always be available to all. The senior and disability discount is a promise made that insured this segment of the population could continue to enjoy recreating in the national forest. It should not be broken. The debate over the action stated in E9-28744 requires more discussion and more transparency. As it is currently written, I cannot support a directive that the Senior (Golden Age) and Access (Golden Access) discounts be reduced from 50% to 10% for campgrounds and related Granger-Thye concessions.