

WHOSE FORESTS ARE THEY, ANYWAY?

11/11/10
Carolyn Holbrook ~

As a senior citizen it is getting more & more difficult to vacation. With fuel prices increasing, social security benefits not increasing, cost of living going up & part time jobs hard to come by, the elimination of the 50 percent camping discount is a very hard pill to swallow. For those of us that prefer to camp instead of moteling it, you're making it extremely difficult.

Public lands are just that ~ PUBLIC LANDS!! If the price for camping on public lands increase, you can bet that the price of private campgrounds will increase. Have you checked prices lately?? Times are tough, give us a break.

Sincerely,
Greg & Janet [REDACTED]
Bishop, CA

An Analysis

Public Response To Proposed Changes In Interagency Pass Policy At Concessionaire-Managed Forest Service Recreation Sites

WESTERN SLOPE NO-FEE COALITION

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April, 2010

EXECUTIVE SUMMARY

The U.S. Forest Service proposed a major policy change regarding Interagency Pass acceptance at concessionaire-managed recreation sites.

The Service received 4,101 comments in response to their proposed change. The data show that there was almost no public support for reducing the Senior/Disabled camping discount from 50% to 10%. Those who have qualified for the lifetime Senior and Disabled passes value camping and outdoor recreation as fun and healthy activities and appreciate that the discounts make access affordable. Many mentioned that without the discount they would be less able to afford outdoor recreation and would likely cut back on their visits to National Forest recreation sites and facilities.

An unexpected finding was that there is a strong distaste for the use of private concessionaires to manage publicly owned recreation facilities. Commenters frequently said that they prefer to have federal employees operating federal facilities. Many commenters attributed increases in the price of camping to concessionaire management and there is a perception that campground managers who work for a concessionaire are primarily interested in collecting money and do a poor job of maintaining the facilities.

Where concessionaires are used, there was a desire expressed that private management be transparent to the users, so that the same rules for access and pass acceptance would apply as at federally managed sites.

The Forest Service made a good decision to continue with current discounts for lifetime passholders at both privately and federally managed campgrounds. However their policy of applying different pass acceptance policies at concessionaire managed day-use sites than at federally managed ones is deeply unpopular, is of doubtful legality, and desperately needs to be changed by the agency or, if necessary, by Congress.

BACKGROUND:

The Forest Service announced that they received about 4,100 comments in response to their proposal “FS-2009-0001-0001 Proposed Directives for Forest Service Concession Campground Special Use Permits,” which was published in the December 1, 2009 Federal Register (FR Doc #E9-28744) and underwent a 60-day public comment period.

The proposal was for changes to the discount terms at concessionaire-managed Forest Service campgrounds for holders of lifetime Senior and Disabled passes. It would also have changed the pass-acceptance terms at concessionaire-managed day-use sites for all Interagency (America the Beautiful) Passholders (both annual and lifetime). The Chief of the Forest Service has since withdrawn the proposal, citing public opposition. However to date the Forest Service has not published a summary of the public comments they received.

ANALYSIS:

The comments submitted were obtained from the Forest Service on electronic media under the Freedom of Information Act. There were 4,101 commenters.

Comments came from citizens in all 50 states and the District of Columbia, as well as three Canadian provinces and Guam. Here is the tally by state:

AK	25	IL	42	ND	2	TN	62
AL	36	IN	27	NE	8	TX	372
AR	40	KS	39	NH	22	UT	32
AZ	160	KY	26	NJ	16	VA	45
CA	500	LA	40	NM	63	VT	4
CO	169	MA	21	NV	54	WA	169
CT	14	MD	19	NY	38	WI	31
DC	4	ME	6	OH	52	WV	11
DE	3	MI	67	OK	39	WY	36
FL	362	MN	27	OR	268	Guam	1
GA	50	MO	49	PA	53	Canada	3
HI	2	MS	18	RI	1	Unknown	542
IA	25	MT	129	SC	37		
ID	73	NC	63	SD	104	Total	4101

Comments were submitted by email, regular letter, and through the federal website www.regulations.gov. There were 3,833 comments submitted through the website, 117 via email, and 151 by regular mail.

ALMOST NO ONE SUPPORTED THE PROPOSAL

For this analysis, all 151 mailed letters and 117 emails were reviewed and categorized as either supportive of the change or opposed to it. Of the 3,833 comments submitted online, 38 (every hundredth one) were read and categorized as either supportive or opposed.

Of the 117 commenters who submitted by email, 116 were opposed to the Forest Service's proposal. Of the 151 commenters who sent letters by regular mail, 150 were opposed to the Forest Service's proposal.

Because the number of comments submitted online through regulations.gov was voluminous, it has not been possible to read and categorize them all. Instead we looked at a fair and unbiased cross-section by arbitrarily selecting every hundredth comment. These 38 representative online comments are shown at the end of this report.

Of the 38 representative comments, only one was supportive of the Forest Service's proposal. It is a letter submitted by Mr. Steve Werner, Vice President of American Land and Leisure, one of the largest of the Forest Service's concessionaires. It is of interest that at least ten letters containing identical wording to Mr. Werner's letter have been encountered among the comments, almost all of them from individuals affiliated with various Forest Service concessionaires. Three of these individuals are also members of the Board of Directors and/or Executive Committee of the National Forest Recreation Association (NFRA). According to their website, NFRA "represents and serves as an advocate for businesses offering quality outdoor recreation opportunities to the public on federal lands and waters across the United States."

It is notable that concessionaire firm Cradle of Forestry submitted a comment opposing the proposal because they feared the policy change would anger their customers and create problems for their employees.

THE PUBLIC DISLIKES PRIVATE MANAGEMENT

A surprising and extremely important aspect of the comments was a widespread sentiment that private concessionaires should not be operating federal campgrounds at all. There is a strong dislike of for-profit management, accompanied by a desire to have recreation sites managed by federal employees and/or volunteers. Some typical comments:

- "Discontinue having private companies operate the campgrounds and go back to the Forest Service handling the duties." [Web Comment #1748]
- "Concessionaires should not be driving the bus on this important issue!" [Web Comment #3405]
- "These public-owned facilities and recreation sites should remain for all Americans, not for the concessionaires of the moment. ...We should not be required to further support concession-run sites with increased fees paid to for-profit concessionaires just because baby

boomers are getting older and handicapped people are handicapped.” [Web Comment #3055]

- “Perhaps the Forest Service should look to the increasing number of senior campers as an opportunity to increase the Volunteer Campground Host program and eliminate the concessioners.” [Web comment #3799]

- “I am dismayed by the general movement toward privatization which has inundated our government over the years. I fondly remember the days when Forest Service employees, not private contractors, greeted campers such as myself. Those employees loved the woods and were instrumental in instilling that love and appreciation into millions of visitors to our country’s outdoor spaces. Concessionaires fulfill no such role.” [Mail Comment]

- “Return FS campgrounds to FS management, replace high campground fees with minimal fees and encourage the public to think of public lands as their lands and not as a financial resource for a private company or corporation.” [Web Comment #1565]

- “Our national public land system should not be managed by third party concessionaires. That job was given to the specific agency to provide the best management possible for the land and the people. Please, do your job.” [Web Comment #3389]

- “Concessionaire operated sites typically reflect a higher fee structure than those operated by in-house Forest Service employees. Their profit motive seems to be the modus operandi. In addition, the concessionaire operated sites tend to isolate the Forest Service from the day to day management of the area and limits their ability to respond to recreational issues.” [Web Comment #3602]

- “I cannot understand why the Park and Forest Services cannot operate the parks and forests without the concessioners.” [Web Comment #3522]

- “The concessionaires make plenty of money and I, personally, have been disappointed in the manner some of them are keeping our campgrounds. ... My suggestion would be to get rid of concessionaires and turn the campgrounds back to the Forest Service and let us have the campground receipts to maintain and improve campgrounds.” [Web Comment #1725, by a USFS employee]

- “I also believe that the privatization of our national lands by having campgrounds run by concessionaires was a mistake and should be corrected.” [Email comment]

- “When you consider that the Forest Service can under REA recover incremental costs for operating and maintaining both standard amenity and expanded amenity fee sites, the continued use of concessionaires should be re-examined.” [Web Comment #3296]

- “I believe the awarding of contracts to administer campgrounds and other public services should be reversed, and returned to supervision by forest service employees. ...Return all campgrounds to forest service

operation, now!!!! I want my old Forest Service back, today. No commercialization of campgrounds, now or ever.” [Web Comment #0147]

- “This proves why privatization of the national campgrounds was a horrid mistake from the get go.” [Web comment #1003]

THE PUBLIC WANTS CONSISTENT POLICIES

While most commenters focused on the impact of reducing camping discounts for lifetime passholders, a substantial number also mentioned their desire that where the Forest Service uses concessionaires to manage day-use (Standard Amenity Fee) sites they should require them to accept Interagency (America the Beautiful) Passes as payment in full, just as the federal agencies are legally required to do.

The Forest Service has, for several years, followed a policy of exempting concessionaires that manage day-use sites from the requirements and restrictions that would apply if the site were federally managed. Concessionaires are allowed to refuse to honor Interagency Passes at sites where the Forest Service would be legally required to accept them. Concessionaires are also not held to the same restrictions and requirements at day-use sites as legally apply to the Forest Service, and are not obligated to invest day-use revenues back into the site where they were collected. The resulting patchwork of different policies at different federal sites depending on what entity manages the site is arguably not in compliance with the Federal Lands Recreation Enhancement Act and has led to confusion and anger among the public.

In withdrawing this proposal, the Forest Service announced that this patchwork of policies would continue.

Some typical comments about inconsistent policies at agency-managed versus concessionaire-managed federal day-use sites:

- “Allowing annual passes to cover Standard Amenity Fees at day use areas, but not the lifetime passes, would be a grievous violation of the spirit of the law, if not the letter of the law itself.” [Web Comment #3818]
- “The Crook County [Wyoming] Land Use Planning and Zoning Commission further urges the United States Forest Service abide by and honor the rules and regulations created to market the Federal Lands Recreation Enhancement Acts AMERICA THE BEAUTIFUL-NATIONAL PARKS and FEDERAL RECREATIONAL LANDS passes and the standard amenity recreation fees rules and regulations identified to the purchasers of such passes at the time of its purchase.” [Web Comment #3397]
- “Private concessionaires should not be allowed to dictate public lands policy.” [Email Comment]
- “The agency also seems to propose eliminating free entry for day use purposes under all existing permits and offering a 10% token

discount...Some sites that derive most of their revenue from day use fees could potentially become uneconomic as concessions...but that is not a reason to penalize the Golden Age/Golden Access user. The agency expresses concern for concessioners that might be impacted, yet fails to mention the consequences to recreation permit holders.” [Mail comment from a retired Forest Supervisor]

- “Another concern we have is that the proposed policy seems to indicate that day use fees would become the revenue of the concessionaires with no obligation to ever be spent at the site where they were collected, as opposed to the Forest Service’s earlier promise (in their effort to gain public support for fees) that fees collected would remain on and for that site. . .” [Email Comment from Mineral County Montana Board of County Commissioners]

- “Federal facilities should have consistent rules nationwide, they should not vary depending on individual management contracts.” [Web Comment #211]

- “The same rules should apply for concessionaire-managed facilities that apply for agency-managed facilities. Concessionaires are not benefit to the public.” [Web Comment #2412]

- “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.” [Web Comment #2899]

- “Whereas the Federal Lands Recreation Enhancement Act (REA) established citizen-based Recreation Resource Advisory Committees (RRACs) to provide input to the Forest Service on recreation fees, the concessionaire operated sites are exempt from this process and there is no public involvement process for input to their fee structure.” [Web Comment #2899]

- “The Federal Lands Recreation Enhancement Act requires these passes to be accepted at all Standard Amenity Fee areas. By not accepting these passes the Forest Service -once again- will be in violation of the law.” [Web Comment #2891]

CONCLUSION

Our analysis of the comments shows that the Forest Service proposal had almost no public support, and Chief Tidwell did the right thing when he withdrew it. Much of the criticism was based in a strong dislike – if not antipathy – to the whole concept of using private for-profit companies to manage publicly owned recreation facilities. In general, the public would prefer that federal employees manage federal facilities.

While the Chief's decision satisfies the public's desire that seniors and the disabled continue to receive their traditional 50% discounts at developed campgrounds, persistent problems regarding acceptance of Interagency Passes at day-use sites have not been resolved.

The Interagency Pass (America the Beautiful Pass) was established by the Federal Lands Recreation Enhancement Act (FLREA). Beginning in 2007 Interagency Passes replaced the Golden Age, Golden Access, Golden Eagle, and National Parks Passes, although the older passes continue to be honored until they are lost, stolen, or expire. Interagency Passes are available at four different prices: \$80 for an annual pass, \$10 for a lifetime Senior pass, free for a lifetime Disabled pass, or in return for 500 hours of approved volunteer work. Although it can be obtained any of those four ways, there is only one pass authorized in the FLREA.

The FLREA specifies the following acceptance terms for the Interagency Pass:

16 U.S.C. 6804 (a) (1) AVAILABILITY AND USE- The Secretaries shall establish, and may charge a fee for, an interagency national pass to be known as the 'America the Beautiful--the National Parks and Federal Recreational Lands Pass', which *shall cover* the entrance fee *and standard amenity recreation fee* for *all* Federal recreational lands and waters for which an entrance fee or a standard amenity recreation fee is charged. *[emphasis added]*

In direct contradiction to this provision of federal law, the briefing paper that accompanied Chief Tidwell's decision to withdraw the concessionaire policy change says:

“There is no requirement for concessioners to honor any passes for Standard Amenity Recreation Fee day-use sites.”

In other words, the Forest Service allows pass-acceptance policy to differ at federal day-use recreation sites depending on whether they are directly managed by the agency or contracted out to a concessionaire.

The use of concessionaires to manage federal recreation sites is a convenience to the Forest Service, not a benefit to the public. In fact our analysis of these comments, as discussed above, indicates that a large segment of the public sees concessionaire management as a detriment to their enjoyment of public lands.

Many, if not the majority, of those who commented would much prefer that recreation facilities be operated directly by the Forest Service and that the use of concessionaires be minimized or eliminated completely.

We would like to stress that the decision whether or not to use a private concessionaire is made internally by the agency, without public input or comment. Likewise, increases to concessionaire fees are approved administratively without undergoing the public participation and advisory committee approval that is required for increases to agency-collected fees.

When the Forest Service requests a fee increase at an agency-managed site, they often point to fees charged at nearby concessionaire-managed facilities as justification. The concessionaires in turn then use the increased federal fee to justify their next fee increase. The result has been a “ratchet effect” of public and private fee increases building upon one another. As the authors of the letter on the cover of this report put it, “If the price for camping on public lands increases you can bet that the price of private campgrounds will increase.” Experience has proved that to be true.

Even more disconcerting is the fact that the Forest Service allows private concessionaires to charge fees the agency is itself prohibited from charging (such as fees for parking). The agency also allows concessionaires to charge fees at day-use sites lacking the amenities that would be required before the Forest Service could legally charge a fee at the same site. In effect, the Forest Service and other federal land management agencies are allowing private companies to set access policy on public lands, bypassing both Congress and the public.

While the withdrawal of this proposed policy change by the Forest Service restores the traditional 50% discount for seniors and the disabled at National Forest campgrounds, concessionaires that manage campgrounds in National Parks are not required to honor it, and many do not. Holders of Interagency Passes, who were assured their pass would cover virtually all federal day-use fees and confer a 50% discount for senior/disabled camping, are still being turned away at hundreds of day-use and camping sites where their passes should be honored.

The Western Slope No-Fee Coalition and its members and affiliated organizations call on Congress to reassert its oversight authority for federal public lands and assure that they are managed in a nationally consistent manner and in conformity with federal law regarding fees, passes, requirements, and restrictions.

REPRESENTATIVE COMMENTS SUBMITTED ONLINE

Following are 38 representative examples of the 3,833 comments submitted through the federal website www.regulations.gov regarding “FS-2009-0001-0001 Proposed Directives for Forest Service Concession Campground Special Use Permits.” Because of the large number of online comments, it was not possible to read and categorize every one, so we selected this unbiased subset to show in their entirety.

The website assigned each comment a document number in the order they were submitted beginning with number 3. (Documents number 1 and 2 are a spreadsheet meta-index and a copy of the Federal Register notice.) For this analysis we selected the first public comment document and every hundredth comment after that.

Although the Forest Service supplied individual names and addresses to us when the author included them in their submission, we have chosen to redact personally identifying information to protect the privacy of these individuals. The only exception is a letter from a corporate entity.

PUBLIC SUBMISSION	Received: December 02, 2009 Tracking No. 80a62126
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Document: FS-2009-0001-DRAFT-0003

Comment on FR Doc # E9-28744

Name: Jim R. [REDACTED]

Address: [REDACTED]

Warren, PA, 16365

Email: [REDACTED]@verizon.net

Phone: 814-725-7548

The Forest Service plans to change the terms under which Senior and Access (permanent disability) passes are honored. No more 50% discount on camping fees. No more free access to day-use sites.

The details are in yesterday's Federal Register. You can read the notice [HERE](#).

If you are a Senior (or plan to become one), or if you or a family member have a permanent disability, this is a slap in your face.

PUBLIC SUBMISSION	Received: December 03, 2009 Tracking No. 80a630b3
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Document: FS-2009-0001-DRAFT-0103
Comment on FR Doc # E9-28744

Name: Karen [REDACTED]
Address: Chula Vista, CA, 91910

I am 64 years old. I have been a camper all my life, always paying full price or using a Golden Eagle or Adventure Pass for which I paid full price.

Upon reaching age 62, I was delighted to qualify for the Senior Pass and to finally get a break on camping fees. Several of my grandchildren, all campers, went with me to the USFS office to buy my new pass.

Since purchasing this pass, I have used it to continue to camp as before and to explore new areas which I had always felt were beyond my budget. I am very pleased to have the opportunity to explore and learn about new places.

I strongly object to having the discount for this pass reduced. I have paid my dues, both as a full-price user of our public lands and for numerous years as a volunteer in parks.

Our public lands belong to all of us. They are not here just to make money for concessionaires. Please do not reduce the discounts which we senior citizens have earned. Thank you.

PUBLIC SUBMISSION	Received: December 04, 2009 Tracking No. 80a634fb
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Document: FS-2009-0001-DRAFT-0203
Comment on FR Doc # E9-28744

Name: Richard [REDACTED]
Address: [REDACTED]
Greybull, WY 82426
Email: [REDACTED]@tctwest.net
Phone: 307 [REDACTED]

I am adamantly opposed to changing the discount currently given to senior citizens w/respect to campground usage. This is one of the few perks that I have been counting on as I travel to our national parks and forests. I will be eligible for

the Golden Age Pass next year. My wife and I have always supported our parks and forests. This is one small way you say thank you for our past support. Being on a fixed income, this discount will save us a considerable amount of money. I hope you will reconsider this change of rules.

PUBLIC SUBMISSION	Received: December 04, 2009 Tracking No. 80a62cee
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Document: FS-2009-0001-DRAFT-0303
Comment on FR Doc # E9-28744

Name: William R. [REDACTED]
Address: [REDACTED]
Sedona, AZ, 86339
Email: [REDACTED]@msn.com
Phone: 928 [REDACTED]

Thank you for the opportunity to express my displeasure at the proposed changes to my Senior America the Beautiful Pass. I enjoy and use the 50% camping discount. When I purchased the pass this discount was included in my membership fee.

I am a decorated veteran.

I believe that promises made by our country should be honored. You will lose my respect if you decide to make these changes. Please honor this country's commitment to our seniors and the disabled.

Respectfully submitted,
Bill [REDACTED]

PUBLIC SUBMISSION	Received: December 04, 2009 Tracking No. 80a63f42
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Document: FS-2009-0001-DRAFT-0403
Comment on FR Doc # E9-28744

Name: Paul W [REDACTED]
Address: [REDACTED]
[REDACTED]
Green Cove Springs, FL, 32043
Email: [REDACTED]@gmail.com

I write to object to the change in discounted camping and day-use fees for senior and disabled persons using concessionaire operated facilities. This is a mean-spirited proposal with significant adverse impact for the typically fixed low-income situation confronting this population.

Surely our national policies ought not be to bail out Wall Street while hammering senior and disabled persons. Concessionaires who object to the current policies ought to forfeit their contracts.

PUBLIC SUBMISSION	Received: December 04, 2009 Tracking No. 80a63ffa
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Document: FS-2009-0001-DRAFT-0503
Comment on FR Doc # E9-28744

Name: AL [REDACTED]
Address: [REDACTED]
Melrose Park, IL,

Why do senior taxpayers have to pay twice?
We pay with income tax and now with use tax.

PUBLIC SUBMISSION	Received: December 05, 2009 Tracking No. 80a640c9
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Document: FS-2009-0001-DRAFT-0603
Comment on FR Doc # E9-28744

Name: Randy [REDACTED]

I would vote a strong no against this proposal. We have based our retirement partly based on using the 50% discount on public lands. I believe that it is a way of the concessions to still make a big profit at the expense of the public. I would think that retired people would fill more empty spots during the less use periods. Reducing the discount, I believe, will force many people to use private facilities at near the same cost.

PUBLIC SUBMISSION	Received: December 05, 2009 Tracking No. 80a643c2
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Document: FS-2009-0001-DRAFT-0703
Comment on FR Doc # E9-28744

Name: Russell [REDACTED]
Address: [REDACTED]
Redding, CA, 96003
Email: [REDACTED]@com-pair.net
Phone: 530-[REDACTED]

I'm a senior age 68 on a fixed income in a time of deep recession. Please reconsider this action and leave in place the current Golden Ager Card benefits. It be meaningless to institute a 10% discount card. If I could pay the 90% I wouldn't need the Golden Ager Card. There are times as this that I believe the Government is completely out of touch with the senior populations needs and problems. What are you thinking.....

PUBLIC SUBMISSION	Received: December 05, 2009 Tracking No. 80a64444
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Document: FS-2009-0001-DRAFT-0803
Comment on FR Doc # E9-28744

Name: Patty [REDACTED]
Email: [REDACTED]@swbell.net

For almost 40 years my husband and I have enjoyed camping in the National Forests Campgrounds but looked forward to the day when we could take advantage of the Senior discount. Finally this last August we were able to purchase the Senior Pass and w/ it came the discount for the NF campgrounds. We are on a fixed income and have to count almost every penny. We hope when you make your final decision you will consider all of seniors and continue to give us the 50% discount.

Thank you,
Patty [REDACTED]

PUBLIC SUBMISSION	Received: December 05, 2009 Tracking No. 80a644b5
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Document: FS-2009-0001-DRAFT-0903
Comment on FR Doc # E9-28744

Name: Bert [REDACTED]

I think that is important to keep the fees the way they are. if one is changed, it will erode the rest of the fees and will just cascade down hill until all discount fees have been done away with. I will qualify for some of these discounts in 1 more year, and envision them disappearing just before I get there just like many other things the government has taken away as I have approached those deadlines. First it will be the 50% discount, then the Corps parks will follow, then the National parks will follow then the Passport card will disappear. This will be just the first of many changes that will be instituted and and stripping of benefits for those who have paid for them their whole life, and to benefit a corporate bottom line, imagine that.

Thanks

PUBLIC SUBMISSION	Received: December 05, 2009 Tracking No. 80a64534
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Document: FS-2009-0001-DRAFT-1003
Comment on FR Doc # E9-28744

Name: Mary [REDACTED]

Taking away senior campground discounts is unAmerican.
It is all about the greed of the concessionaires. Let the concessionaires give up their discounts but let those folks that need and deserve it, been looking forward to it keep the senior campground discount. This proves why privatization of the national campgrounds was a horrid mistake from the get go.

PUBLIC SUBMISSION	Received: December 05, 2009 Tracking No. 80a645a9
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Document: FS-2009-0001-DRAFT-1103
Comment on FR Doc # E9-28744

Name: Suzanne Jean [REDACTED]

Address:

[REDACTED]
Evansville, IN, 47714

Email: [REDACTED]@yahoo.com

Phone: 812-[REDACTED]

Submitter's Representative: Lugar

Re: National Forest raising disabled pass holder fees:

This is ridiculous! How many disabled and Seniors have a high income? I don't. It's bad enough to simply try to fill my van (now needed due to disability) with gas, let alone have to pay higher and increased fees to some idiot running a private concession on FEDERAL PROPERTY - PAID FOR BY TAX PAYERS.

What on earth is this country coming to?????

PUBLIC SUBMISSION	Received: December 06, 2009 Tracking No. 80a64662
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Document: FS-2009-0001-DRAFT-1203
Comment on FR Doc # E9-28744

Name: James Leon [REDACTED]
Address:

[REDACTED]
Maylene, AL, 35114

Email: [REDACTED]@yahoo.com
Phone: 205 [REDACTED]
Submitter's Representative: Bachus
Government Agency: VETS

As a 100 pct disabled veteran I really depend on the 50 discount for camping fees at the Federal and Army corp of Engineers Parks and Campground. I am full time in a RV motorhome and use the parks extensively.

Please do not do away with the discount for use of the ACCESS PASS that really helps me diminish the cost of getting out and enjoying the parks and campgrounds.

PUBLIC SUBMISSION	Received: December 06, 2009 Tracking No. 80a647b2
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Document: FS-2009-0001-DRAFT-1303
Comment on FR Doc # E9-28744

Name: gordon ray [REDACTED]
Address: [REDACTED]
san marcos, CA, 92078
Email: [REDACTED]2@yahoo.com
Phone: 760-[REDACTED]

FOREST SERVICE; I'M A SENIOR AND APPRECIATE THE HALF OFF WITH THE GOLDEN EAGLE PASS. I HAVE PAID REGULAR PRICE MY 50 YEARS OF GOING TO THE FOREST SERVICE PARKS. PLEASE KEEP THE HALF OFF FOR SENIORS AND DISABLED WHICH I ALSO AM. I FEEL MOST OF THE BABY BOOMERS ARE PROBABLY GOING TO PRIVATE RV PARKS BECAUSE THEIR RV ARE TO BIG TO FIT IN A FOREST SERVICE PARK AND THEY PERFERR COMPLETE HOOK UPS. THANK YOU GORDON [REDACTED]

PUBLIC SUBMISSION	Received: December 06, 2009 Tracking No. 80a6484b
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Document: FS-2009-0001-DRAFT-1403
Comment on FR Doc # E9-28744

Name: anita lois [REDACTED]
Address: [REDACTED]
Yuma, AZ 85367
Email: [REDACTED]g@yahoo.com
Phone: 970-[REDACTED]

I reject the proposed decrease in the use of the Sr. pass to 10% discount to Fed Parks. This is the last enjoyment that Sr.'s have & can afford. By using the Sr. pass & being able to camp with their grandchildren & getting to do that for half price is priceless & you want to take that away? Your discusting-& need to find another way to get income. Maybe you could stop building top of the line offices for your staff & cut some of the wages of the workers who have new trucks every year & sending 2-4 people out to do a job when it could be done with one person. Do an audit of yourselves before you start picking on seniors!!!!
Thank you, A TAX PAYER!!!

PUBLIC SUBMISSION	Received: December 07, 2009 Tracking No. 80a660f6
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Document: FS-2009-0001-DRAFT-1503
Comment on FR Doc # E9-28744

Name: Otto [REDACTED]

This administration really wants to lose the Senior vote. This reg, if implemented, will result in less revenue from me rather than more, and I would bet a net drop in revenues. But, I wouldn't expect anyone in government to understand pricing in a free market economy.

PUBLIC SUBMISSION	Received: December 08, 2009 Tracking No. 80a6666b
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Document: FS-2009-0001-DRAFT-1603
Comment on FR Doc # E9-28744

Name: Walter Arnold [REDACTED]
Address: [REDACTED]
Idaho Springs, CO, 80452
Email: [REDACTED]@yahoo.com
Phone: (303) [REDACTED]
Fax: (303) [REDACTED]

I am opposed to reducing the discount rate for seniors and the disabled. I realize that operating costs are increasing but to increase revenue by increasing costs to only part of the camping public is highly discriminatory. If operating costs demand a fee increase then the fee increase should be applied equally to the entire camping public as a nation-wide percentage increase.

PUBLIC SUBMISSION	Received: December 09, 2009 Tracking No. 80a67693
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Document: FS-2009-0001-DRAFT-1703
Comment on FR Doc # E9-28744

Name: Nancy S [REDACTED]

We are seniors who motorhome and enjoy the National Forest Campgrounds and Corps of Engineer Campgrounds in the south all winter. We love the woods and the outdoor feeling. By raising this rate, we probably will not be able to spend as much time there as before. Our income is limited and that's another reason why we love those campgrounds. Please do NOT change the current policy.

PUBLIC SUBMISSION	Received: December 10, 2009 Tracking No. 80a68dab
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Document: FS-2009-0001-DRAFT-1803

Comment on FR Doc # E9-28744

Name: David [REDACTED]

Email: [REDACTED]@tctwest.net

Regarding the proposal to lower the Golden Age discount fee from 50% to 10%, I ask:

My Golden Age Passport states UNEQUIVOCALLY that I am ENTITLED to a 50% discount on camping fees. How can you arbitrarily change this discount when my Golden Age Passport states this? Is not this a binding contract? Please explain.

PUBLIC SUBMISSION	Received: December 11, 2009 Tracking No. 80a69624
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Document: FS-2009-0001-DRAFT-1903

Comment on FR Doc # E9-28744

Name: Jim [REDACTED]

Address: [REDACTED]

Forest Grove, OR, 97116

Email: [REDACTED]@juno.com

Phone: 541 [REDACTED]

Government Agency Type: Federal

Government Agency: USDA

I do not agree with charging, full price with a 10% discount, for camping. I worked all my life and paid tax's. Now it is time to enjoy, but is getting harder all the time. some dept. is always wanting to raise fee's. LeaVE IT ALONE.

PUBLIC SUBMISSION	Received: December 14, 2009 Tracking No. 80a69c7f
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Document: FS-2009-0001-DRAFT-2003
Comment on FR Doc # E9-28744

Name: John [REDACTED]
Address: Spring Valley, CA, 91978

Under this proposed directive the two population brackets, Seniors and Disabled, Will be required to nearly double their cost to enjoy the gifts of our Nations Parks/Forests. These population groups do not make up a significant percentage of the total visitors who camp in the National Park/Forest system. The amount of monies projected out over the next 12 years(from the proposal) does not take into account the ability of the concessioners to raise the camping fees along the time frame.

Those who can least afford the increase are singled out for corporate bottom line profits.

This population group also spends monies in the gift shops and food service areas of the sites visited.

This is, sadly, corporate thinking at its best. Shame on them for this.

The corporate concessioners have contracted with the Federal Government to manage the visitor experience but they don't own our Park/Forest Trusts. I fully understand their need to make a profit just not on the backs of this population group.

I vote NO to this proposal and would like to see these folks be allowed full access to our National Treasures.

PUBLIC SUBMISSION	Received: December 17, 2009 Tracking No. 80a6dacf
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Document: FS-2009-0001-DRAFT-2103
Comment on FR Doc # E9-28744

Name: Janet [REDACTED]
Address: [REDACTED]
Ridgecrest, CA, 93556
Email: [REDACTED]@ridgenet.net
Phone: 760 [REDACTED]

As a Senior on a fixed income, I definitely oppose the proposed change in fee discounts. I do camp regularly and I do so because the 50% fee reduction for

campgrounds makes this much more possible for me. I enjoy day-use areas as well with reduced fees. While I sympathize with the concessionaires, my income does not go up and everything else does. Please do NOT implement these changes. We older folks have enjoyed being recognized as senior citizens who have "earned" this discount by our many years of service to our country.

PUBLIC SUBMISSION	Received: December 22, 2009 Tracking No. 80a6f901
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Document: FS-2009-0001-DRAFT-2203
Comment on FR Doc # E9-28744

Name: Mr&Mrs Dennis frederick [REDACTED]
Address: [REDACTED]
Oneida, NY, 13421
Email: [REDACTED]@twcny.rr.com
Phone: 315-[REDACTED]

Please do not reduce the discount we senior citizens receive on camping permits. Most of us are on fixed incomes and it would put an extra burden on us. There must be another way to solve this problem. Thank You

PUBLIC SUBMISSION	Received: December 30, 2009 Tracking No. 80a74223
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Document: FS-2009-0001-DRAFT-2303
Comment on FR Doc # E9-28744

Name: Dorothy [REDACTED]
Address: [REDACTED]
Payson, AZ, 85541

I am living on a fixed income and really enjoy being able to camp at certain lakes and campgrounds. I am only able to do because the fee is 50% reduced. By you dropping it to 10% is not at all fair at this time of my life or for other senior citizens. With all the new taxes being imposed on all of us and no COLA on our Soc Security for the first time in 35 years-US citizens cannot afford this outrageous added expense. We have paid into the system, have been law abiding citizens, pay our income taxes every year and this is what you propose to do - to punish all of us seniors who enjoy the great outdoors. There is little pleasure left for us while we still have our health except for the forest service campgrounds that we can afford to use at the 50% cut. THIS IS A DREADFUL AND WRONG

PROPOSAL --PLEASE DO NOT IMPLEMENT THIS. Please consider this and don't make this proposal law.

PUBLIC SUBMISSION	Received: January 06, 2010 Tracking No. 80a77cb7
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Document: FS-2009-0001-DRAFT-2403
Comment on FR Doc # E9-28744

Name: Mary [REDACTED]
Address: [REDACTED]
Sarasota, FL, 34233
Email: [REDACTED]@Juno.com

I object to reducing senior discounts in national forest campgrounds. The government is going back on its promise to satisfy a private profit-making entity, concessionaires. I would suggest you poll every holder of that pass and see how they feel.

PUBLIC SUBMISSION	Received: January 08, 2010 Tracking No. 80a7880a
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Document: FS-2009-0001-DRAFT-2503
Comment on FR Doc # E9-28744

Name: David Miles [REDACTED]
Address: [REDACTED]
Hereford, AZ, 85615
Email: [REDACTED]@MSN.COM

I served my country in the US Navy for 24 years. I am a retired disabled Vet. The golden access card is a small payback for my dedication to my country. Now some money hungry concessioner and go along government bureaucrat wants to take away mine and thousands of other disabled vets earned reward. You people and your noncaring attitudes sicken me. Obviously none of you served your country let alone appreciate the sacrifices the vets of the US armed forces made for you. Even if the decision to decrease the 50% discount and free park entry is over ridden, I will never forgive your ungratefulness. One disgusted VETERAN.

PUBLIC SUBMISSION	Received: January 09, 2010 Tracking No. 80a7abde
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Document: FS-2009-0001-DRAFT-2603
Comment on FR Doc # E9-28744

Name: John D [REDACTED]
Address: [REDACTED]
Anacortes, WA, 98221
Email: [REDACTED]@verizon.net

If the proposed legislation affects the Golden Age Passports of my wife & myself, please defeat it. We are 72 & 76 & frequently use these passports to get discounts all the way to 100% when parking at & visiting US National Parks & Monuments. This includes North Cascades National Park where I frequently hike. - - - John & Nancy [REDACTED]

PUBLIC SUBMISSION	Received: January 11, 2010 Tracking No. 80a7aef8
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Document: FS-2009-0001-DRAFT-2703
Comment on FR Doc # E9-28744

Name: Brian [REDACTED]
Address: Livingston, TX, 77399

I am very much against the changing of the rules for the senior pass. The pass was setup to recognize the contribution that seniors have made during their lifetime in support of the National Forests and other Dept of Interior Agencies. Because the Agency has decided to delegate its responsibilities to concessionaires (who's objective is to make money) does not relieve the Forest Service from participating in the congressionally approved program which is administered by the DEPT of Interior. Unless the entire Dept of Interior (Including the National Park Service) promotes this proposed directive I don't understand how the Forest Service can even consider and obtain approval for modifying its program. Also, if the Dept of Interior suggested it unilaterally modify the program for all its agencies I am sure each congressman would be inundated with mail to retain the program as it currently is administered.

PUBLIC SUBMISSION	Received: January 13, 2010 Tracking No. 80a7c2b8
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Document: FS-2009-0001-DRAFT-2803
Comment on FR Doc # E9-28744

Name: John David [REDACTED]
Address: [REDACTED]
Aurora, CO, 80010-3915
Email: [REDACTED]@yahoo.com

I oppose the proposed directive. The proposed rule reducing the discount for seniors and disabled americans has several problems: 1. It will cause a farther reduction in the people using the forests and forest facilities. These are the people who support your department and the forests themselves. 2. It will pose a hardship on the people who can afford it least. I am a retired custodian and while I get along I do not have spare money to pay for the use of lands I have supported with my taxes for decades. 3. The concept that contractors who one assumes read the contracts they sign are being deprived or cheated does not stand the test of reason. 3 Increased income to the Forest Service have been offset by reductions in funding justified by those increased incomes. The increases in fees will not therefore benefit the forests. 4. The supposed income will further increase pressure to centralize and enlarge bigger campgrounds while encouraging the closure of smaller campgrounds. The forests I use have numerous campgrounds which were closed when fees were first instated because they could not generate sufficient revenue. In conclusion I feel that the proposed fee increases will benefit only the concessioners who signed binding contracts and therefore the increases should not be put into effect. John D. [REDACTED]

PUBLIC SUBMISSION	Received: January 17, 2010 Tracking No. 80a7ecf3
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Document: FS-2009-0001-DRAFT-2903
Comment on FR Doc # E9-28744

Name: kenyon e [REDACTED]
Address: [REDACTED]
platte city, MO, 64079
Email: [REDACTED]@embarqmail.com
Phone: 816 [REDACTED]

reduce camping fees for the old... keep it

PUBLIC SUBMISSION	Received: January 19, 2010 Tracking No. 80a7f679
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Document: FS-2009-0001-DRAFT-3003
Comment on FR Doc # E9-28744

Name: Thomas W [REDACTED]
Address: [REDACTED]
Frostproof, FL, 33843-8363
Email: [REDACTED]@verizon.net
Phone: 1-863-[REDACTED]
Fax: 1

This concerns the subject proposal document ID FS-2009-0001-0001.
Please do not dishonor those of us who have served our country and community .
Please do not change the current program which allows seniors and handicapped
citizens to enjoy federal parks and properties at free or 50% discounted rates.

PUBLIC SUBMISSION	Received: January 20, 2010 Tracking No. 80a80c98
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Document: FS-2009-0001-DRAFT-3103
Comment on FR Doc # E9-28744

Name: Frank [REDACTED]

As a senior citizen and an RV'er, I and my wife have waited our entire life to retire and take advantage of all the savings that we can get on our fixed income, and that includes visiting all the National Parks, which, incidently belong to all of us anyway, and not paying the crazy amounts of fees that you are intending to charge us. It is bad enough that we have gotten no increase in our Social Security this year, our utilities, food and just about everything we need has gone up in price, including our real estate taxes which is outrageous considering we live in New York State. Now, you want to take away one of the only really good bargains we get that has no strings attached? Please remember that if something works, don't fix it!!!

PUBLIC SUBMISSION	Received: January 23, 2010 Tracking No. 80a82815
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Document: FS-2009-0001-DRAFT-3203
Comment on FR Doc # E9-28744

Name: Paul [REDACTED]
Address: [REDACTED]
Benton, KY, 42025
Email: [REDACTED]@fuse.net

It is bad enough that seniors have costs going up everywhere and our retirement accounts have gone to less and less, medical costs are increasing, drug prices out of the world, and now you want to take away the one recreational perk that retired people and disabled people have in getting a price break when using the national parks for camping. I don't know what this world is coming to but it seems no one has any cares about humanitarian issues -- JUST someone's pocketbook. AT LEAST YOU NEED TO GRANDFATHER IN WHAT WAS GIVEN TO US INSTEAD OF BEING AN INDIAN GIVER -- GIVE AND THEN TAKE AWAY!!!!

BAD IDEA -- VOTE NO TO CHANGING THIS!!!!

PUBLIC SUBMISSION	Received: January 24, 2010 Tracking No. 80a82e14
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Document: FS-2009-0001-DRAFT-3303
Comment on FR Doc # E9-28744

Name: Michael Scott [REDACTED]
Address: [REDACTED]
Tarpon Springs, FL, 34688
Email: [REDACTED]@yahoo.com

I have been disabled since February 1989 and have had the pleasure of using my Golden Access Passport frequently since I received it. My grown children and relatives are scattered all across the US and I enjoy visiting the many US Parks as I travel.

I find in disconcerting that yet another government promise is being broken for the benefit of a government contracted vendor who probably won the contract due to political influence.

In my way of thinking, the contractor knew of the conditions of the passes when they bid on the contract, and should have been ready to accept them upon winning.

Please do not change the conditions under which these passes were given to the holders.

PUBLIC SUBMISSION	Received: January 26, 2010 Tracking No. 80a840fc
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Document: FS-2009-0001-DRAFT-3403
Comment on FR Doc # E9-28744

Name: Patricia Eileen [REDACTED]
Address: [REDACTED]
Gardnerville, NV 89460
Email: [REDACTED]@aol.com
Organization: NA

I strongly oppose the US Forest Service's proposal to cut senior pass discounts under the America the Beautiful plan...cutting these discounts will prevent many people on fixed incomes from enjoying the outdoor beauty of this country.

PUBLIC SUBMISSION	Received: January 27, 2010 Tracking No. 80a83487
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Document: FS-2009-0001-DRAFT-3503
Comment on FR Doc # E9-28744

Name: Brett [REDACTED]
Address: Silver City, NM, 88022

Dear official,

I am deeply alarmed and troubled by the efforts of your agency to drastically reduce the discounts afforded to senior citizens and the disabled at Forest Service campgrounds managed by private concessionaires. These passes/discounts have been on the books for close to five decades, guaranteeing these particular user groups receive discounts to enjoy the public lands.

This is a complete breach of faith for the Forest Service to change the terms/guidelines of these passes after they have been purchased under a different understanding and agreement by current pass holders. Back door efforts like this are a great way to increase public distrust of our federal land managers. We cannot afford to do this in the 21st Century.

As I understand it, the new policy contained within the proposed directives would also take away the privileges afforded to these user groups at day-use sites. These passes/discounts are guaranteed under law. Any new policy should and must be in compliance with this law. Why private concessionaires are being allowed and/or encouraged to dictate new policy is beyond me.

Lastly, these are public lands facilities and campgrounds built by the tax dollars of the people and reserved for the people of this country to use. Your continued modification of the public resource is grossly misguided, immoral, and illegal. The further turning over of the resource to private companies to manage and manipulate the resource is incredibly indicative of the failure and incompetency

of our federal land agencies to manage the public lands for the American people, as mandated by Congress.

I strongly urge you to strike down these outrageous corporate driven considerations and do what you are supposed to do: manage and preserve the public resource in such a way that all current and future Americans can AFFORD and enjoy the public lands for generations to come.

Thank you.

PUBLIC SUBMISSION	Received: January 29, 2010 Tracking No. 80a872f8
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Document: FS-2009-0001-DRAFT-3603
Comment on FR Doc # E9-28744

Name: Steve Werner
Address: 747 East 1000 South
Orem, UT 84097
Email: steve@americanll.com
Phone: 801-226-3564
Fax: 801-225-6223
Organization: American Land & Leisure

Attn: Carolyn Holbrook
U.S. Forest Service
Recreation and Heritage Resources Staff
1400 Independence Avenue, SW., Stop 1125
Washington, DC 20250-1125

Subject: Proposed Directives for Forest Service Concession Campground Special Use Permits: Published in the Federal Register / Volume 229k, No. 74, December 1, 2009.

Dear Carolyn,

The following letter is submitted by American Land & Leisure in response to the proposed change to the Forest Service directives governing permits for operation of campground and related Granger-Thye concessions, as published in the Federal Register on December 1, 2009. Carolyn, as you know, we are one of the largest Forest Service concessioners, who currently manages 32 SUPs in eleven states. In 2009, we hosted 375,806 Forest Service facility campers nights (campsites occupied for one night each). We have been in this recreation management business for over 20 years.

It is in the best interest of the Forest Service concession program to operate in a manner that is fair and equitable to all campers and visitors to day use areas. This is a highly successful program that has re-invested millions of dollars directly back into campsites, picnic areas, cabins, and other recreation facilities. The concessionaires provide thousands of paying seasonal jobs, and they contribute local taxes to many rural communities. The concession program is the best means to keep campgrounds and day use areas open, maintained, and safe places for families to visit. The Forest Service realizes a significant savings without incurring the entirety of the facility operational costs, notwithstanding the savings to the taxpayers in not adding to the Federal payroll. In addition to not having to carry the expense of the campgrounds, the Forest Service receives fees from the concessionaires, with the majority of the funds going directly back into improvements on site. The American public benefits greatly from the Forest Service campground concession program.

The concession program must be economically logical and viable. The proposed policy change will be of great benefit to the public at large. The 50% discount given to Seniors is driving the cost of camping higher for all other campers. It is reasonable to have a 10% discount, as proposed, which is normal and acceptable for Seniors and disabled guests at restaurants, hotels, and other places of business. It is often the amount of discount available to AARP members.

'America the Beautiful Passes' issued under the Federal Lands and Recreation Enhancement Act state, "The pass ... generally does NOT cover or reduce special recreation permit fees or fees charged by concessionaires." Therefore, concession operations are not included in the provisions of the passes.

Requiring concessionaires to give away 50% of their services is in direct conflict with other laws and regulations that pertain to government contracting.

- We support the proposal to reduce from 50 to 10 percent the camping fee for holders of Senior and Access Passes and Golden Age and Golden Access Passports.
- We support the proposal to have concessionaires offer 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.
- We support the concessionaires providing free use to holders of Annual and Volunteer Passes at standard amenity day use sites.
- If these discounts are not adopted, reimburse the concessionaires for any discounts they are required to provide.

The surcharge component to the concessionaires' fees should be deleted. It is not possible to directly link a change in revenue to any single factor. Existing permits should continue at the agreed upon government fees until a new permit is issued.

Thank you.

Sincerely,

Steve Werner
Vice President
American Land & Leisure
747 East 1000 South
Orem UT 84097
steve@americanll.com

PUBLIC SUBMISSION	Received: January 30, 2010 Tracking No. 80a87ad3
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Document: FS-2009-0001-DRAFT-3703
Comment on FR Doc # E9-28744

Name: Alida [REDACTED]e

I am opposed to the US Forest Service desire to change the benefits of the Golden Age/Senior Pass! I have worked long, given my time, shared my talent, and feel this Golden Age pass is a small reward for being a senior. If this benefit is changed as proposed, I will not be able to afford to go places that I can go now. DO NOT change the benefits of these passes!

PUBLIC SUBMISSION	Received: February 01, 2010 Tracking No. 80a889eb
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Document: FS-2009-0001-DRAFT-3803
Comment on FR Doc # E9-28744

Name: Gary B [REDACTED]
Address:

[REDACTED]
Las Cruces, NM, 88011

Email: [REDACTED]@nmsu.edu

Proud owner of Golden Age Passport (GAP). It states "lifetime admission valid for lifetime of permittee and entitles holder to free entry and 50% discount on use fees eg camping. Concessionaire honor pass if included in terms of their contract" Recognized by 7 federal land management agencies, including FS. Moral, ethical

and legal implications of wording implies no change to existing passport!
THEREFORE RECOMMEND NO CHANGES TO GAP! Recommend Senior
and Access passes also be honored same as GAP! GAP in existence over 40yrs,
generally understood. With 7 agencies transparency essential. Proposed changes
will cause confusion. FS elected to use concessionaires AFTER establishment of
GAP. Everyone fully aware of GAP requirements. Contracts written accordingly.
Subtle differences between, and reasons for, GAP and Senior Pass not clear, but a
numbering system/coding process that can't differentiate is INEXCUSABLE! If
difference between passes deemed essential, reinstitute with system that can
properly code different systems without penalizing existing cardholders.
Comparing NPS to FS not valid as NPS has many sites not controlled by
concessionaire. FS doesn't. Economics of fees are suspect. Majority of nonsenior
users are above national ave. income. Seniors probably below. Poor
concessionaire = complainer, good ones are not. SARF big smokescreen and
going to cause more confusion, less transparency. FS needs to get on Board.
Seniors not adequately informed of proposal. Nothing in trade journals. Don't
understand differences in agencies. Not aware of Fed Register Bib gov in action.
No transparency. Other agencies will be blamed as well. Expect GAP holders to
demand rights of existing card when they use it. Me too. TOTALLY OPPOSE
PROPOSED DIRECTIVES IN DOC ID FS200900010001!
