



September 16, 2020

Mr. Kurt Rausch
Chief of Commercial Services Program, National Park Service
Commercial Services Program, National Park Service
1849 C Street, NW
Mail Stop 2410
Concession Contracts Rule Comments
Washington, DC 20240

Re: Regulation Identifier Number (RIN) 1024-AE57

Dear Mr. Rausch,

On behalf of the nation's Service and Conservation Corps (Corps), thank you for the opportunity to provide comments on the National Park Services' (NPS) Proposed Rule on Commercial Visitor Services; Contract Concessions. We appreciate NPS taking into consideration comments from partners.

Modern Corps are descended from President Franklin D. Roosevelt's Civilian Conservation Corps (CCC). During the Great Depression, in a time of great need in our country, the CCC engaged millions of young men to conserve and improve our nation's public natural resources and infrastructure. Corps today, including the 130+ represented by The Corps Network (TCN), carry on that legacy by helping to conserve and maintain those same resources on federal, state, and local public lands and in addressing economic development and workforce needs in urban and rural communities.

Corps provide young adults and veterans the opportunity to serve their country, advance their education and obtain in-demand skills. Serving in crews and individual placements, Corpsmembers perform important conservation, recreation, infrastructure, wildfire, disaster response, and community development service projects. Corps enroll over 25,000 youth and veterans annually in all 50 states, DC and territories.

Due to the COVID-19 pandemic, our country is in another time of great need. We have seen record unemployment. We have also seen changes in how and where we work. Working from home has led to increased numbers of our citizens taking advantage of the many National Parks in our country. The need for them to be maintained and improved has never been greater.

Corps already partner with our National Parks on maintenance, operations and improvement projects. These projects vary from trail maintenance, campground improvement and interpretive



station installation. Corpsmembers are gaining life skills while being part of these projects and NPS is training the next generation of environmental stewards.

TCN supports efforts to deliver better visitor experiences in parks, including through the addition of appropriate new infrastructure and activities under concessionaire agreements. Specifically, we support modern campgrounds, widespread access to broadband connectivity in front country zones and the transfer of functions like trash collection and restroom maintenance to non-NPS entities so that NPS resources can focus on uniquely appropriate functions like interpretation and resource protection. We also urge NPS to expand cooperative endeavors involving the agency, concessionaires and Corps such as H.O.P.E. – Hands On Preservation Experiences – where Corpsmembers learn historic preservation skills including carpentry, masonry and vegetative management. Dozens of such projects have occurred in recent years, restoring important park assets at lowered costs and connecting youth to our parks. But the opportunity to do more is tremendous, and we would encourage NPS to (1) recognize concessionaires willing to participate in such programs with additional points in offer evaluations and (2) consider such programs in reviews of concessionaire performance.

During these past few months, with the high unemployment rate for youth and young adults, some Corps have seen an increase in applications for their programs. We hope that by the NPS expanding their work with concessionaires that it will lead to additional opportunities for Corpsmembers to gain workforce and life skills that will put them on the path to a bright future. Currently, around 40% of our member Corps do projects with the NPS but we can do and want to do more. We are supportive of efforts to improve the experience of visitors to our National Parks and as the NPS looks for ways to augment those experiences we hope that Corps can continue to be a partner with the NPS and concessionaires on these projects.

Thank you again for the opportunity to provide comments on the NPS' Proposed Rule on Commercial Visitor Services; Contract Concessions. Corps have been a partner with the NPS for many decades and we look forward to continuing our productive relationship. Please feel free to contact me with any further questions or comments.

Sincerely,

Mary Ellen Sprengel
President & CEO