



NPCA position on H.R. 3200 – Gateway Community and Recreation Enhancement Act

September 19, 2023

Dear Representative,

Since 1919, National Parks Conservation Association (NPCA) has been the leading voice of the American people in protecting and enhancing our National Park System. On behalf of our 1.6 million members and supporters nationwide, I want to share our concerns on H.R. 3200 – Gateway Community and Recreation Enhancement Act.

H.R. 3200 – Gateway Community and Recreation Enhancement Act: NPCA appreciates the intent of this legislation, as well as the continued efforts of the Committee to ensure America’s public lands are protected. However, we are concerned H.R. 3200 lacks clarity on the visitation data that will be collected, how that information will be made available to the public, and undermines Superintendent authority. The current budget for the NPS cannot bear the costs and staffing to meet the goals outlined in the bill.

The Visitation Pilot Program as outlined is a massive, resource-intensive undertaking that requires extensive data collection, organization and publication. The Department of the Interior (DOI) and Department of Agriculture (USDA) would require new funding to create a new, publicly accessible visitation data program that meets a standard of excellence visitors can trust when planning their travel and recreation. DOI and USDA do not currently have the technical resources to collect, organize, analyze or publish visitation data at the scale outlined in H.R. 3200. As the Committee has heard before, many parks with high visitation are already understaffed and have been dealing with flat budgets for a decade. Without additional funding, the requirements in this bill are not feasible and Congress cannot reasonably expect successful program implementation.

While the purpose of the Visitation Pilot Program is not explicitly stated in the bill, it is presumably intended to disperse visitors across federal land recreation destinations in an effort to reduce crowd density. Ensuring dispersal techniques are managed properly is a complex and challenging endeavor. While visitor dispersal might provide some relief to parks experiencing intense crowding, unintended consequences of increased visitation in new places adds to management burdens and poses long-term threats to park resources. Dispersal as a visitor use management strategy must be further studied, and the financial and human resource costs must be considered before implementation on the scale proposed in this bill.

Of greatest concern in this bill is Section 4, which limits the ability of an NPS superintendent to reduce access to a park unit unless there is a risk to health and safety. 36 CFR 1.6 outlines the specific circumstances that enable a superintendent to undertake closures. Section 4 of this bill creates an unnecessary burden for superintendents as they work to protect the resources the parks were created to preserve. A park unit can temporarily restrict access to areas of a park for a variety of reasons such as migrating fauna, trail damage, or research. These types of closures do not pose a risk to visitor health and safety, but they are instrumental to ensure the protection of irreplaceable park resources. If this bill were

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to pass as it is currently written, park managers would have to go through a time consuming NEPA-style public engagement process for simple closures that are routinely undertaken. 36 CFR 1.6 ensures that superintendents can uphold the Organic Act mandate and act responsively to changing conditions. Stripping superintendent authority to make timely closures will harm natural and cultural resources and put some of our most fragile national treasures at risk.

If you have any questions or need additional information, please contact NPCA's Visitor Experience Program Manager Tucker Johnson (tjohnson@npca.org).

Thank you for considering our views.

Sincerely,

Christina Hazard
Legislative Director, Government Affairs
National Parks Conservation Association