March 28, 2022

Commercial Services Program

National Park Service

1849 C Street NW, Mail Stop 2410

Attn: VEIA Rule Comments

Washington, DC 20240

Re: Comments of the RV Industry Association on the Visitor Experience Improvements Authority Contracts Proposed Rule; National Park Service, RIN 1024-AE47

The RV Industry Association (“RVIA”) appreciates the opportunity to provide the following comments in response to the Proposed Rule published by the National Park Service (“NPS”) in the Federal Register on January 25, 2022, to implement the Visitor Experience Improvements Authority (“VEIA”) given to the NPS by Congress in Title VII of the National Park Service Centennial Act.[[1]](#footnote-1) For the reasons set forth by these comments, RVIA supports the Proposed Rule.

**STATEMENT OF INTEREST**

RVIA is the leading voice of the $114 billion RV industry, representing approximately 470 manufacturers and component and aftermarket suppliers who together produce 98 percent of all RVs made in the United States. The association is the leading source of research, data, and analysis about the RV industry, and seeks to grow and expand the RV consumer market while cultivating a positive experience for current and next-generation RVers through its Go RVing program.

For decades, the RV industry has been growing with more diverse Americans turning to RVs as the perfect way to experience the great outdoors. For example, 600,240 RVs were produced in 2021, by far the most ever built in a single year, surpassing the previous record set in 2017 by 19% and the number of RVs built in 2020 by nearly 40%.

RVIA strongly supports increased investment in campgrounds on public lands as well as the establishment of partnerships between experienced campground operators and the federal government, as an innovative mechanism for addressing sustainable campground modernization, expansion, and operations on public lands. RVIA is a longtime advocate for public-private partnerships, where appropriate, as one of the best approaches to effectively striking the necessary balance between achieving conservation needs and improving the experience for an ever-changing park visitor. These partnerships are a sensible, proven way to bring public land infrastructure into the 21st century, ensuring the federal government remains the owner of all public lands and preserving access and enjoyment of federal campgrounds for current and future generations of RVers to come.

**COMMENTS IN RESPONSE TO NPS QUESTIONS ON THE PROPOSED RULE AND THE USE OF THE VEIA**

The Proposed Rule asks for comment on two additional criteria for commercial services contracts issued by the NPS under the VEIA: (1) The contract must be necessary and appropriate for public use and enjoyment of the National Park System unit where it is located; and (2) The contract must be consistent with the preservation and conservation of the resources and values of the unit.

These comments address question four of the topics on which NPS is requesting comment.

**Where does the NPS need to expand, modernize, and improve the condition of commercial facilities and visitor services?**

Bringing public lands infrastructure into the 21st century requires robust and creative collaboration across the public and private sectors. The RV industry supports partnerships between experienced campground operators and the federal government, where appropriate, as these partnerships recognize that private industry expertise can augment public investment and strengthen the management of major infrastructure projects.

Limitations on how federal land agencies can partner with concessioners and other recreation services permit holders reduce opportunities for collaboration and modernization. VEIA is a complementary tool to the existing concessioner framework which helps public lands and campgrounds provide unparalleled visitor experiences for all Americans.

When partnerships between private industry, such as experienced campground operators, and the federal government are discussed, there can be confusion about whether this model would lead to the “privatization” of federal lands. These partnerships are not privatization—the RV Industry Association does not support the privatization or selling of federal campgrounds. What these partnerships do allow is for campground improvements and modernization to be made with private industry expertise, investment, and volunteer services—without draining federal resources that are thin or not available.

The demographics of the next generation of campers, which includes a younger, more diverse population, are creating a shift in expectations and uses of campgrounds. Research shows a growing number of consumers who enjoy outdoor recreation also want modern, full-service amenities and the ability to share resources. They prefer to use digital means to access reservations, schedule activities, obtain equipment, as well as share their experiences with friends and loved ones.

There should also be a focus on promoting sustainability and limiting environmental impact when modernizing and expanding campgrounds.

In particular, federal campgrounds could be improved by:

* Updating bathing facilities with hot showers, sinks, and flush toilets;
* Providing access to wi-fi throughout campsites to provide enhanced park programming, rentals, and safety while also appealing to current and next-generation campers and mobile professionals that require wi-fi to work virtually;
* Outfitting campsites with site-specific hookups, including *new* EV hookups, electrical service, water and sewer, as well as modern dump stations. Providing robust EV infrastructure is a critical part of improving outdoor access and modernizing outdoor facilities
* Developing wider, longer campsites for modern RVs;
* Developing more campgrounds and RV-accessible campsites to accommodate the growing demand for RV camping, while producing additional revenue for federal agencies; and
* Addressing the nearly $20 billion deferred maintenance across federal lands and waterways;

Federal campgrounds must meet today’s expectations and become a more vibrant source of relevant outdoor recreation experiences for current and future generations to enjoy and protect.

**CONCLUSION**

RVIA appreciates the opportunity to comment on the Proposed Rule as we share the NPS’s and Congress’s interest in expanding, modernizing, and improving facilities and visitor services in the national parks. We look forward to continuing this dialogue as the agency pursues efforts to modernize and improve those visitor services through implementation of the VEIA and other means.

If you have questions or if RVIA can serve as a resource, please contact Chris Bornemann, Director of Federal Affairs, at cbornemann@rvia.org.

Respectfully Submitted,



Jay Landers

Vice President,

Government Affairs

1. Visitor Experience Improvements Authority Contracts, 87 Fed. Reg. 3,729 (Jan. 25, 2022) (“Proposed Rule”). [↑](#footnote-ref-1)