

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 1

Author Information

Keep Private: No
Name: Megan
Organization: Lake Clark National Park and Preserve
Organization Type: I - Unaffiliated Individual
Address: Anchorage, AK 99501
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 04/01/2016 Date Received: 04/01/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

1. The only mention DO 21 makes of park level Partnership Coordinators is in 3.1.1 Ethical Conduct Requirements as part of a reference to partnership liaisons. Under 3.1.3 Authorized Employees no mention is made of the role of park level Partnership Coordinators and no mention is made of park level partnership coordinators in reference to the new training that will be offered and the "philanthropic and partnership community of practice" that it will foster. As written the document only refers to regional and WASO level partnership coordinators.

- Training offered should include partnership liaisons and partnership coordinators throughout the service. A community of practice needs to include the employees doing the day to day liaison work with partners at every level of the organization.
- Park level partnership coordinators should be able to be designated as some sort of level of "Authorized Employees" with delegation of authority for routine partnership, budget, and donation acceptance levels. This type of set up is provided for from the director to the regional directors and the regional directors to the superintendents for both vetting of donors and acceptance of donation. Somewhere in this process there needs to be training and responsibility at the partnership coordinator position. I would suggest that having superintendents be the Authorized Employee and undergo the training as defined with an additional level of "community of practice" liaison training provided that would prepare partnership coordinators to implement the requirements of DO 21, prevent issues, and speed up the vetting needs of the "authorized employees" may be a best practices model.

2. I would suggest that delegation of authority to accept donations match the delegation of authority to authorize fundraising activities. As it is written there is cross-over of authority between superintendents, regional directors, and the WASO Partnerships and Philanthropy Office being set-up. This will lead to confusion. For examples, superintendents would be able to authorize fundraising for projects up to \$100,000 (or \$1 Million with training), however, for any single donation over \$50,000 that is part of that initiative they would need Regional Director approval of the vetting process with no provision allowed for the delegation of that authority back down to the superintendent. A similar process is established for donations over \$250,000 with the WASO office. This seems like it will create cumbersome processes for highly performing fundraising partners who are working at the park level.

3. 5.3 Process for Vetting Direct Donations - please define direct donations in this section. Without this definition it is not clear what this includes and it doesn't include.

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4. Line 202 - 3.1.3 "in addition" i) subject to conditions in 5.2. As this is written, grants are not subject to 5.3 regarding Direct Donations. Is that correct? That does work as there are things in 5.3 that would cause significant issues for receiving grants that are listed under 5.3. As a general comment, I think it is fairly confusing how grants received as part of an open and competitive process are handled in this document. For example, if a Chief of Interpretation were to receive a \$30,000 grant for a program under the open and competitive Explore Fund Grant offered by North Face, could a superintendent just accept that? Or is that considered a "Direct Donation" requiring that North Face fill out a DI3680 Donor Certification Form as defined under 5.3.1a? Clarification that open competition grants are not included in this would be useful to the field.

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Correspondence: 2

Author Information

Keep Private: No
Name: Cindy
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Philadelphia, PA 19106
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 04/18/2016 Date Received: 04/18/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I think that this document will be difficult to use in the field in some aspects, and partners and parks may interpret different sections differently and prize one section over another. The area of most concern is recognition of corporate sponsors where it can bleed into advertising. I am trying to imagine applying the guidance at Independence where we have great pressure to use the park and some buildings by partners for what amounts to advertising because it might be good for the city or some other activity.

Please clarify in 4.1 whether or not NPS can accept money from for-profit corporations' advertising or marketing budgets/whether only philanthropic source funds can be accepted.

Line 456 - if the advertising is done in a park, doesn't that automatically imply the park is endorsing the product or service?

4.4.1 Cause-Related Marketing should be eliminated or better defined as permissible within a park only when attached to an NPS philanthropic effort - or never within a park's boundaries. The NPS should agree to a partnership marketing only if it strengthens the NPS mission. Does this marketing have to meet the same terms as sponsored events etc? I hope so.

4.6.1 add that the activities must conform to 36 CFR 5.1 and clarify how that will be possible: Commercial notices or advertisements shall not be displayed, posted, or distributed on federally owned or controlled lands within a park area unless prior written permission has been given by the Superintendent. Such permission may be granted only if the notice or advertisement is of goods, services, or facilities available within the park area and such notices and advertisements are found by the Superintendent to be desirable and necessary for the convenience and guidance of the public.

Also for 4.6.1 Clarify whether or not 8.9.1 applies to this section of the DO
(1213-1219 The NPS may recognize event sponsors as long as corporate names are not used in a way that would imply or suggest NPS endorsement of a product, service, or company, or be construed as commercial solicitation or advertising. Corporate sponsors may be recognized at special events by limited use of corporate logos and name script on event facilities,

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signs, and in literature. The size, scale, scope, and location of corporate logos and name script should not dominate the event facilities or area. The NPS will not permit the appearance of advertising and marketing slogans and taglines. The purpose of recognition is simply to acknowledge the sponsor.) I hope it does.

6.1, definition of Philanthropic partners is really important - can that be moved to earlier in the DO- -helps set the table for who can participate in these marketing, fundraising, etc. efforts that we are expanding. It's not just any organization or person who wants to raise money in a park and maybe donate a little.

6.2.4 Sponsorship Agreement is really important - can that get more prominence or emphasis? Also needs to reference 36 CFR 5.1

Please clarify in 6.5 that Sponsorships are for short term, temporary It looks like there is internal inconsistency between 6.5 Sponsorships

8.9 and 8.9.1 and 9.9.3 - add 36 CFR 5.1

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Correspondence: 3

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Chesnee, SC 29323
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 04/20/2016 Date Received: 04/20/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I find the changes to policy noted in the the draft #DO 21 to be very disturbing and counter to the NPS Organic Act. It is my understanding that this would allow the NPS to enter into naming agreements with alcohol producers - a truly horrible idea - try explaining that to school children.

I also am extremely opposed to the new changes that provide naming "rights" or privileges (even temporarily)for Visitor Centers , benches, bricks etc. Since our mission is preservation, that brick/bench etc will could easily to use the same preservation resources needed for monuments in the park example -to units that fought in that battle). Once the NPS starts this, it is a VERY slippery slope. I work at a small battlefield. I have had Daughters and Sons of the American Revolution (DAR and SAR) as that we re-install old NPS waysides that name their ancestor (regardless of content)so that they can see their name in the park. I was able to dodge that bullet, since the wayside is old,not longer fits our interpretive theme, and we no longer have the wayside. However, if the DAR or SAR paid for the wayside, we will never be able to take it down. Even if we take it down, they could request a record of it or more. I joined the NPS to take care of America's treasures, not America's donors.

The current philosophy that we need to change our donor guidelines to "keep up with modern trends" is a fallacy. A private garden, zoo or sports arena are not funded with tax dollars or accountable to the American public (or donors with political sway). Fifteen years from now, the garden could destroy the walkway made with \$100 bricks - we cannot even remove private graves on land purchased for the parks (think Cades Cove). If an organization wants to give to the NPS, a press campaign and press release should be enough.

People HATE that arenas are named the Verizon Center or similar (like the renamed football bowl games). They will be even more upset when their tax dollars are used to staff and promote the That is not who we are. We should not provide monuments to corporate giving and donor recognition. Even the "donor recognition" Find Your Park banners are offensive when we bring them into schools and other places in uniform. This is the federal government. Rather than saving the parks money, it is going to provide a short-term gain for a few superintendent's and regional directors for a long-term, high cost for

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the tax payers. It may take the next century to undo this. We should be better than this. Just look at the issues we have with concessions and the lodges out West.

The NPS is out of our league. It will cost more in lawyers, grants management, etc to get out of some of these "donations" than we can ever bring in. On a similar note, the NPS is currently asking for budget increases, donor recognition, etc - a furiously giving away money to make us popular with park "partners" instead of dealing with the backlog maintenance, funding cultural resources, facility maintenance, etc positions.

Please look at the long term. Thank goodness Mather and Albright didn't name the historic lodges after the railroads (and railroad owners). If we had any staff in cultural resources (I think everyone I know in this field in the NPS is term and the NPS may only have 10 historians), they could provide 100 years of lessons learned on this topic. But the NPS is not putting our money there. Our budget has never been bigger - maybe it is time to look at using it the most wisely.

Closing the park to the public to provide an event or party for a donor is not why we are here. There are thousands of venues available for this (no shortage, pretty much EVERYWHERE else) - NPS sites do not need to be on this list. We preserve something of NATIONAL SIGNIFICANCE (remember why we are America's best idea? and why national parks are different than the European pleasuring grounds?) - and are funded with tax dollars - we do not need to be a corporate party or wedding venue. I am truly disappointed that the Centennial is being used for very short-term gain.

We specialize in preservation (and future generations) - that is not what donor recognition is about. I have had to be that Ranger that had to find the name of someone who gave money (for a plaque, a sign, etc). These should be monuments to this country and American history, not donors.

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Correspondence: 4

Author Information

Keep Private: No
Name: Jeremy
Organization: WASO - National Accessibility Branch
Organization Type: I - Unaffiliated Individual
Address:
Washington, DC 20005
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 04/22/2016 Date Received: 04/22/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Just like NPS, partners are required by law to ensure that any effort they undertake is accessible to individuals with disabilities. NPS is liable if it is engaged in a partnership and the results of that partnership are not accessible; therefore, NPS must ensure that agreements are written and overseen in such a way as to ensure accessibility. The following additions are recommended:

Line 603 to 605: add the phrase "electronic accessibility" as follows - "Such links must conform to NPS and Departmental policies for 604 digital governance, management, electronic accessibility, and security." Add the correct Departmental Manual for electronic accessibility as follows - "See Director's Order #70: Digital Governance 605 and Management and 375 DM 8: Section 508 Program and Responsibilities."

Line 789: add the word "accessibility" as follows - "co-branding efforts, accountability, accessibility, and recordkeeping."

Line 793 and 794: Any "agreement templates" included in RM-21 must (a) make all parties aware of their accessibility responsibilities and (b) include standard language regarding the partner's accessibility responsibilities and how that partner will be held accountable for ensuring accessibility.

Line 984 and 985: Add "comply with accessibility standards" as follows: "expectations between the NPS and its partner and ensure that projects are properly scoped, meet critical mission needs, comply with accessibility standards, and can be operationally sustainable."

Add a new line 992: A new bullet to follow "Sustainable over time in terms of maintenance and operations" which would be "Compliant with accessibility standards."

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Correspondence: 5

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Sedro Woolley, WA 98284
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 04/25/2016 Date Received: 04/25/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

There seems to be limited guidance on the following:

How is fundraising for specific NPS projects and programs and fundraising for the organization itself identified and/or separated? Many partners provide services outside the parks, so if a fundraiser occurs on park property, do all the proceeds go to NPS programs? Is it a percentage?

How is the separation maintained with partners that also advocate? Many organizations that advocate would likely be willing to fundraise on behalf of the NPS to increase the association with the agency. But if the organization is also advocating, how will the distance between the two be maintained?

How is the decision made as to who and how many partners can solicit donations in visitor centers and online? And what kind of accountability structure will be developed to make sure that funds raised are applied appropriately?

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Correspondence: 6

Author Information

Keep Private: No
Name: Randy
Organization: Randy W Turner Consulting
Organization Type: I - Unaffiliated Individual
Address:
New York, NY
New York, NY 10025
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 04/26/2016 Date Received: 04/26/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am a retired NPS superintendent with considerable experience working with local and regional non-profit organizations in philanthropy efforts for park projects. In addition, this work included local and state government entities in jointly funded projects and endeavors.

These revisions are long overdue. I support the overall goals of this update. Specific comments include:

- The review and approval of fundraising agreements should not take more than 60 days TOTAL from the submission of an edited draft to an approved document. Indeed, approval at lower levels is needed.
- Reasonable templates should provide the framework BUT one-size does not always fit all. Washington solicitor review should not be excessive (as is currently the case.)
- Regional directors should have more approval authority to accept gifts and approve documents, as outlined in the changes.
- I do not care for the title "premier partner"; choose a definition that better matches the tone of the other three categories.
- The donor recognition changes are more in line with other organizations. Modification to these guidelines may need review much earlier than a review of overall NPS-21. Build in flexibility; not all projects are equal.
- Please do not contribute to the misconception that the NPS Arrowhead is well known and recognized outside of a small audience of NPS employees, retirees and support groups. I am a proponent of licensing the Arrowhead for commercial use. Modify 36CFR and other regulations as needed to make this very significant change possible.

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Correspondence: 7

Author Information

Keep Private: No
Name: Phillip
Organization: American Friends of the Czech Republic
Organization Type: I - Unaffiliated Individual
Address: 1
Washington, DC 20016
Washington, DC 20016
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 04/29/2016 Date Received: 04/29/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The proposed Order #21 on philanthropic partnerships appears well-suited to the kind of government to NGO partnership that our friends group desires to engage in with the NPS NCA. Having this Order in place should facilitate the projects we engage with on behalf of the government of the Czech Republic, in cooperation with NPS.

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Correspondence: 8

Author Information

Keep Private: No
Name: Victoria
Organization: Grand Teton National Park
Organization Type: I - Unaffiliated Individual
Address:
Moose, WY 83012
Jackson, WY 83001
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 04/29/2016 Date Received: 04/29/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for the opportunity to comment on this important policy.

There is much about the draft DO 21 that Grand Teton National Park finds to be positive. We appreciate the emphasis on training for donor vetting and acceptance. We also appreciate the extension of timeframes of agreements for long-standing partners. We support the expansion of authority of regional directors and superintendents to accept donations. We find value in the ability to partner with businesses that are associated with alcohol products.

On page 2, we appreciated that the draft states that NPS employees should "...practice an impartial and inclusive approach to philanthropy at all giving levels from diverse sources." In most cases, the draft document follows this philosophy; however, there is an exception: section 4.6.3 on page 17, Checkout Counter Donation Program.

The issue with this section is both intent and clarity. It seems that the intent is to send all funds generated from this program to NPF, rather than the local cooperating associations and philanthropic partners (in the cases where they are already managing the program/relationships). Aside from not "practicing an impartial and inclusive approach to philanthropy," it impacts funding at park levels by adding an additional administrative layer and fee that comes out of the program. That means less money flowing to park programs and projects. It also may serve as a disincentive for local associations and philanthropic partners from wanting to participate in the program. Finally, it is unclear how funding would flow back to the park and if it would be at the discretion of the park to make decisions on how to use those funds or if NPF would be providing input and oversight of projects/programs that are funded from this source. We would suggest that the decision space on how this funding is spent be all held at the park superintendent level, and this director's order clarifies that in the language.

The park would also like to comment on section 8.5.2 (page 32, line 1176), naming of interior spaces. We are comfortable with the option being available to temporarily name interior spaces; however, we would like to propose that the park

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superintendent, not the director, hold the authority to approve or deny those requests (a dollar threshold could be provided). The park superintendent has much more connection with the interests and sensitivities of the local communities, park donor communities, park staff, and visitors than those who serve elsewhere in the Service. The superintendent could make a well-informed decision on this, as he/she does with other donor recognition that happens within a park site. Also on this topic, limiting the naming to a period of five years should be reconsidered. Perhaps noting that the name is only guaranteed for five years. We can't imagine fundraising for a space every five years to get a new donor - and renaming spaces every five years could be confusing and disruptive. At the park level, in practice, we feel like these naming situations will often outlive the 5-year timeframe, so acknowledging that in the language would provide clarity and flexibility to park superintendents.

Finally, we would like to draw attention to section 3.1.11 (page 10, line 333) regarding annual workplans. It seems that this would be a duplication of effort in some cases. Most parks have an annual call for proposals process that makes up the workplan for the year (or 2-3 years). By submitting park needs and getting feedback/concurrence that these are projects that our philanthropic partners can raise funds around, we are effectively setting the work plan. Please consider modifying the language here and throughout to accept annual funding call processes as an appropriate substitute for generating yet another plan/agreement with our partners. Additionally, as a philanthropic partner has a capital campaign agreement, that partner has a very clear and detailed road map for work that has been approved often at multiple levels of the organization. To also require a workplan again feels redundant and additional work for the park/partner that may not be necessary based on existing processes, plans, and agreements.

Thanks in advance for your review and consideration of our comments.

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Correspondence: 9

Author Information

Keep Private: No
Name: Merle
Organization: National Park Service
Organization Type: I - Unaffiliated Individual
Address: Washington, DC 20005
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/04/2016 Date Received: 05/04/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

page 7 line 193 - 194 section 3.1.3

The use of the word "their" makes this statement unclear. Suggest replacing the first "their" with "the organization" or "the partner organization"

page 16 line 545 - 546 section 4.6.1

The regulation on non-commercial solicitation is found at 36 CFR 2.37 and 36 CFR 7.96(h). Suggest adding this parenthetical at the end of the bullet (see 36 CFR 2.37, 36 CFR 7.96(h))

page 18 line 637 section 5.1

Spacing problem

page 26 line 933 section 6.5

Would we allow a partner to print an advertisement for goods or services in an event program that was to be distributed in the park? Doesn't that conflict with 36 CFR 5.1 Also conflicts with what is said on lines 1218 - 1219

page 33 line 1202 section 8.9

I found the title of the section misleading. Section 8.9 is not about special events, it's about donor recognition at special events. If the section title is changed to reflect that I believe the information in the section would be clearer.

page 33 line 1204, 1206 - 1207 section 8.9

Special events may fall into three broad categories:
Need a hyperlink to 36 CFR 7.96(g)

page 33 line 1212 - 1207 section 8.9.1

Delete the word "fundraising". Any event planned by the partner may have donors and sponsors that they may want to recognize.

page 33 line 1216 section 8.9.1

By the limited use of corporate logos

page 33 line 1228 section 8.9.2

reworded to say "These displays are restricted to the times and locations outlined in the permit."

page 33 line 1229 section 8.9.3

I suggest adding the wording from section 8.9.1 add "The size, scale, scope, and location of corporate logos and name script should not dominate the event facilities or area."

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Correspondence: 10

Author Information

Keep Private: No
Name: Kathleen
Organization: William Paterson University
Organization Type: I - Unaffiliated Individual
Address: Wayne, NJ 07470
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/06/2016 Date Received: 05/06/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

May 6, 2016

Reginald Chapple
Division Chief, Office of Partnerships & Philanthropic Stewardship, National Park Service
reginald_chapple@nps.gov, 202-354-2112.
National Park Service - WASO 1201 Eye Street

Dear Mr. Chapple,

I appreciate the opportunity to comment on the National Park Service's ("NPS") proposed revision of Director's Order #21: Philanthropic Partnerships. As the NPS recognizes, updates to the existing NPS policy on donations are needed to facilitate new philanthropic partnerships in support of the parks. As President of William Paterson University, I can appreciate the many challenges to securing private funding for these institutions.

Contemporary fundraising tools are especially needed for Paterson Great Falls National Historical Park ("Paterson"), which will be a model for public-private partnerships, community engagement, and interpretation of a diverse history. This unique urban National Park will require significant private donations to develop educational, interpretative and recreational facilities, especially for the construction of a state-of-the art visitor center to contextualize the Park's numerous historic and natural resources. The NPS's proposed five-year limitation on naming of interior spaces (see page 32, lines 1176-1185) may prevent important potential philanthropic partnerships.

My experience in higher education has informed my understanding of donor recognition. In the university setting, donations are necessary for the renovation and construction of new facilities, to keep the cost of education affordable, and to enhance learning opportunities. Meaningful donor recognition is central to fundraising success. In my experience with university fundraising, donor naming opportunities that last for three generations are needed to secure significant private donations. A

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five-year limitation on naming of interior spaces is insufficient to attract the sizable donations that will be needed to fund a visitor center in Paterson. Therefore, DO-21 should provide the NPS Director or Regional Directors flexibility to allow a longer duration for naming opportunities on a case-by-case basis.

Sincerely,

Kathleen Waldron
President, William Paterson University
waldronk@wpunj.edu

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 11

Author Information

Keep Private: No
Name: Debbie
Organization: NPS-STE A
Organization Type: I - Unaffiliated Individual
Address:
Scranton, PA 18503
Scranton, PA 18503
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/06/2016 Date Received: 05/06/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Overall comment- I am happy to see this revision and overall feel the changes are very positive for parks. One concern I have after reviewing is that RM 21 is heavily referenced in this document. We are yet to see a revised version of that document. It is critical that RM 21 is ready at the roll out of DO #21 and doesn't delay implementation of the new DO. I am assuming the field will also get a chance to comment on that draft.

Pg. 7 line 210 Section 3.1.4 - I like the concept of the certification training. Again this training needs to be ready at the roll out so as not to delay implementation and use of the revised DO 21.

Pg. 8 line 215 - Is the training and certification required of key partner staff? Early information to the field says yes. They would be required to attend the training and be certified which again I feel is a positive. My concern is with parks with multiple fund raising partners and how that is the training coordinated, what the expectations are of the park to attend with each partner, etc.

Pg. 8 line 247 - I see some confusion over approval of agreements dollar thresholds vs. individual donations. For example this line states that all donations over \$250,000 must be approved at the Assist Director level, yet the table on page 7 indicates that RDs have acceptance of donations up to a million dollars. It seems as though there needs to be clarification between acceptance of donations and approval of agreements and who can accept or approve the various levels.

Pg. 11 line 357 - The council membership is very WASO and region heavy. I would like to see more park involvement including smaller parks. Philanthropy for smaller parks often takes a much different form than for larger parks.

Pg. 13, line 436 - It is a bit disappointing to see the limits on use of donation funds for permanent salaries. I certainly understand the concern over long term funding of permanents with soft funds, but it seems like there could be other options for offsetting permanent salary costs for programs as well as capital projects. An example might be a partner wants to help

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pilot a new program and it could be beneficially to pay the salary of an employee involved in the pilot during the early stage of development.

Pg. 15 line 527 - the (see section) reference should be 4.6.3

Pg. 16 line 535 Section 4.6.1 is a real positive for parks.

Pg. 17 line 575- I feel strongly that requiring all checkout counter donations to go through NPF is wrong. I have worked at a series of small parks without Friends groups. In at least two cases we tried to get assist from NPF for fundraising and/ or the development of a Friends group and a received little to no help. Without NPF support, we cultivated other avenues of support, often through our cooperating association. To require cooperating associations who have been willing to step in and help to now have to send the funds to NPF is kind of a kick in the teeth. I have already head a few cooperating associations say if they have to send the funds to NPF then they wouldn't do a checkout offer which hurts the parks, but I do understand why they would not want to participate.

Pg. 20 line 719-721 - What other bureaus will be reviewing donations of a \$1million or more. This is rather vague.

Pg. 21 line 770- how is short term philanthropic partner defined?

Pg. 23 line 818 - I hope RM 21 will have more information on what types of small scale fundraising events do not need agreements. This section is intriguing but not enough detail to insure we don't over step a boundary.

Pg. 24 - line 845 - I personally have found I could use more information on what is the proper level of insurance for various types of events. Perhaps this might be covered in the LaSalle training?

Pg. 25 line 884 Section 6.4 about licensing and use of logos and marks clearly states the NPS must approve the use of logos and marks in marketing etc., but it doesn't give any indication of who must approve.

Pg. 27 line 994 - 995 -DAB process was required for projects over \$1,000,000 not \$500,000. Maybe I am misunderstanding what you are referring to here.

Pg. 29 line 1055 - Will the new donor recognition policy and therefore the new plan require a revision to existing agreements or can the new policy be referenced in an addendum? I think a streamlined approach to revising an agreement needs to be thought over.

Pg. 33 line 1212 It would be great if RM 21 had some visual samples of good donor recognition including corporate and sponsor recognition.

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Correspondence: 12

Author Information

Keep Private: No
Name: Kevin
Organization: Eastern National
Organization Type: I - Unaffiliated Individual
Address:

Fort Washington, PA 19034-2513
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/07/2016 Date Received: 05/07/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

FROM:
Eastern National
470 Maryland Drive
Fort Washington, PA 19034
215-283-6900

Contact: Kevin Kissling, President & CEO
KevinK@EasternNational.org

Park: National Park Service
Project: Directors Order #21: Philanthropic Partnerships (ID: 60882)
Document: Draft Directors Order #21: Philanthropic Partnerships (ID: 71886)

GENERAL COMMENTS

Eastern National is a cooperating association and long time partner of the National Park Service. We are in the process of developing a strategic plan for the organization to better align our efforts with the needs of our NPS partners. While our role in the past has primarily been an educational retail partner of the parks we serve, we see a shift in the services our partners would like us to provide. As these needs change, Eastern National, and possibly other multi-park associations, is looking to evolve its business model to better meet park needs. This may include becoming the primary fundraising partner where a Friends Group does not exist or providing support and resources to other park partners with their fundraising initiatives. Thus, while we havent served as a philanthropic partner in the past, that may change in the future.

We believe there are many advantages to a multi-park cooperation association becoming an active philanthropic partner at

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parks they serve. As a multi-park partner, we would like to see fundraising agreements take multi-park partner dynamics into consideration. Our primary interest is having flexibility in agreements to allow multi-park partners to provide certain services to multiple parks under one agreement.

6.1 Philanthropic Partners (756-778)

We feel that grouping cooperating associations into a separate category of Strategic Philanthropic Partners limits our ability to meet the future needs of our partners. As we explore opportunities to perform philanthropic services at the request of park superintendents, more flexibility is needed to allow us to meet our partner needs if we decide to assume the role of a park fundraising partner. The type of authorized philanthropic partner should be determined by the activity the partner performs for the Service, not just the historical purpose of the organization. As cooperating associations evolve and are being asked to venture into the world of philanthropy, there should be flexibility in how a cooperating association is categorized and the type of agreement they would use for fundraising initiatives.

6.2.3 Strategic Fundraising Agreement (392-396, 829-834)

If the category Strategic Fundraising Partner remains and all cooperating associations are grouped together, the short term (one year, three year renewal) would make it difficult for us to easily perform many fundraising activities on behalf of parks. A minimum five year term would be preferred for all agreements, but specifically for the following activities: Donation boxes (554-571); Checkout Counter Donation Program (572-589); and Electronic donations (590-605). The short term agreement would also burden our park partners with additional administrative duties.

We also need the ability to have a multi-park agreement for the three above mentioned activities. Having individual agreements with parks for these activities would have a significant impact on the administrative time and cost involved with maintaining multiple agreements. Without a multi-park agreement for these activities, we would set a threshold for participation, thus reducing the number of parks where we could perform these activities.

The most efficient way to allow a multi-park partner to implement the same program in multiple parks is with one long term agreement. A termination clause would provide the Service an exit strategy as needed.

4.6.3 Checkout Counter Donation Program (572-589)

We were excited about the opportunity to solicit donations at the register to directly support parks and we fully support this program. We believe the potential for Eastern National to provide additional funding to parks through this program could be significant.

We'd like the ability to assess a nominal cost recovery fee for donations via the Checkout Counter Donation Program. There are three primary reasons for this request. First, handling the program for multiple parks will involve a fair amount of administrative costs for various tasks such as: managing the agreement; generating store-level and company-wide accounting reports; and processing disbursements.

Second, the majority of cash register transactions are tendered with credit cards. There is a direct fee associated with processing credit card transactions. In fiscal year 2015, Eastern National's company-wide credit card processing fee was 2.4% of net sales. Eastern National would encounter this fee for all donations accepted at the checkout counter when tendered by credit card.

Finally, we may develop printed material to support Checkout Counter Donation Program efforts at stores without EN staff, to passively solicit donations when NPS employees work the register.

A cost recovery fee of 3% would offset some of the additional costs associated with the Program. Eastern National would absorb expenses that exceed 3%. If we are unable to retain a fee, participation in the Checkout Counter Donation Program will result in a direct financial loss to Eastern National and all the parks we support.

4.6.2 Donation Boxes (554-571)

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We would like the ability to recoup the cost of constructing donation boxes. The cost to properly construct a secure donation box can be significant. Cost recovery would give us the ability to implement donation box programs in more parks, which would provide a long term benefit to a high number of parks.

Competency Training and Certification Program (382)

If Philanthropic Partners are required to obtain accredited philanthropic competency training and certification, we would like different requirement levels based on the activities the partner performs. Example: If our only fundraising effort is participation in the Checkout Counter Donation Program, our training and certification needs would be very different than a partner who participates in a high dollar, multi-year fundraising campaign.

Thank you for the opportunity to provide comments on Director's Order #21

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 13

Author Information

Keep Private: No
Name: Jeff
Organization: PEER
Organization Type: I - Unaffiliated Individual
Address:

Silver Spring, MD 20910
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Comments on Proposed Revisions to Director's Order #21 on
Philanthropic Partnerships

May 9, 2016

These comments are offered on behalf of Public Employees for Environmental Responsibility (PEER) an alliance of scientists, rangers and other public sector specialists seeking to improve environmental and public health protections. PEER works with and on behalf of many current and retired employees of the National Park Service (NPS).

The draft of revised Director's Order (DO) #21: Philanthropic Partnerships posted on March 30, 2016 on the NPS Planning, Environment and Public Comment website (PEPC) would transform the Park Service's current passive posture of merely accepting donations to one where it would actively press corporations, vendors and other commercial interests for money. This drive by the NPS to begin aggressively pursuing donations from both corporations and park visitors is a major step in the wrong direction.

For over a century, private philanthropy has supported the preservation of park lands. To facilitate philanthropic support for national park projects, Congress set up a National Park Foundation to explicitly solicit donations. Rather than build on that foundation, this DO would move from "philanthropy with partners" to co-marketing with corporate donors who expect something from park managers in return.

As detailed below, the thrust of our comments is that this revised DO inappropriately diverts public resources to private fundraising, unwisely entangles NPS in corporate marketing schemes and unadvisedly privatizes the national park interpretive function, among other untoward effects.

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In addition, the revised DO places great discretion in the person of the NPS Director. The incumbent in this position, Jonathon Jarvis, has been recently found by the Interior Office of Inspector General to have flagrantly violated ethical restrictions in connection with official fundraising. Because we believe that Mr. Jarvis is ethically unfit to fulfill the role assigned in the revised DO PEER recommends that the draft withdrawn until such time as it is reviewed and approved by the successor to the current NPS Director.

Our specific comments explain how, if adopted, the revised DO -

1. Inappropriately Converts Civil Servants into Fundraisers

One of the major changes that would be effectuated by the revised DO is to significantly expand the role of NPS superintendents in obtaining private donations to support their park operations. Currently, superintendents are authorized to receive gifts of under \$100,000. The revised DO would increase that delegated level to as much as \$5 million and authorize them to execute "philanthropic agreements" of the same dollar value.

As this new \$5 million "cap" is a per-transaction limit without any time frame, park superintendents would be able to accept multiple multi-million dollar gifts per year, per month or even per week. Thus, the revised DO would vest park superintendents, almost all of whom are federal civil servants, with virtually unlimited fundraising authority, so long as gifts are in increments of up to \$5 million.

A. Soliciting Private Contributions with Public Funds

The current DO states that "It is NPS policy that its employees not solicit donations" which is defined as "any request by an NPS employee to a non-federal entity, group or individual for donations to be made directly or indirectly to the NPS in support of its programs." (§2.2)

By contrast, the revised DO declares:

"As a matter of policy, NPS employees generally may not solicit donations." (§3.1.2)

It does not specify what the exceptions are to this "general prohibition." Thus, it is unclear how much time senior NPS officials would be spending soliciting private contributions.

This section further states that the "Director and Deputy Directors...may solicit donations directly or indirectly from private individuals or organizations for the NPS and its programs." Thus, the upper echelons of NPS leadership whose salaries are paid with appropriated funds would be able to spend official time soliciting gifts from private individuals, corporations and organizations.

This arrangement is both unseemly and without precedent. PEER knows of no other federal agency which allows unlimited use of official time to be devoted to private fundraising. This seems even more questionable in that Congress created the National Park Foundation to serve as the charitable arm for NPS. Under the revised DO, the National Park Foundation role would be assumed by the NPS itself.

B. No Legal Authorization for Official Solicitation of Donations

The revised DO cites no authority to support the legality of any of its employees soliciting donations from private groups or individuals on official time and using federal facilities.

Executive Order 12674 on the Foundation for Ethical Behavior generally prohibits federal employees from soliciting or accepting any gift from any person or entity seeking official action, except as authorized by regulation. First there is no such authorizing regulation for any NPS personnel soliciting donations in their official capacity; nor is a DO a regulation.

Second, by authorizing reciprocal official actions in response to gifts - such as donor naming recognition in park facilities, cause marketing tie-ins and NPS logo licensing - this revised DO places all of these interactions into an ethical swamp of

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negotiated quid-pro-quos.

C. Fundraising Duties Would Be Substantial

Setting aside the direct solicitation of gifts, the revised DO lays out thirteen separate fundraising duties which superintendents and other "authorized employees" "must" perform, including to -

- Accept donations;
 - Develop "philanthropic partnership agreements"; and
 - Review "all" donor "solicitation" and other materials about every proposed donation.
- (§3.1.3).

In addition to these multiple mandatory duties, superintendents would be encouraged to engage in another eleven listed fundraising activities, including to -

- Identify philanthropic opportunities;
- Liaison with fundraisers; and
- Work with and support funding partner programs.

The sheer number and range of these new fundraising responsibilities suggest that they will require park superintendents and regional directors to dedicate a significant amount of time to cultivating current and potential donors. Presumably this time that would be dedicated to fundraising would come at the expense of the time now spent furthering agency's core mission -to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations.

D. Fundraising Prowess as Prerequisite for Career Advancement

The revised DO identifies developing "successful philanthropic partnerships" as a "core" competency for superintendents and other NPS managers. These authorized employees "will be required to complete a training certification program to develop the knowledge base and skills for success in philanthropy and partnerships." (§3.1.4)

This language strongly suggests that competence in fundraising would become a minimum requirement to become a park superintendent or above. Coupled with numerous other provisions in the revised DO spelling out donor cultivation activities, success at fundraising may become the basis for promotion in the NPS.

Moreover, it would not be hard to envision this and other language in the revised DO being made the basis for establishing fundraising quotas for superintendents and other leaders, such that meeting specified dollar goals in a quarter would be a major element in their performance evaluations, as well as an explicit factor in making promotional decisions.

By making fundraising prowess a core competency for its leaders, the revised DO would coarsen the agency culture by injecting a distinctly monetary element as an organizational principle. It may also have the effect of excluding recruitment and retention within the NPS of talented conservation leaders who are not particularly interested in or adept at fundraising.

2. Removes Prohibition on Using Donations to Offset Appropriated Funds or Pay for Recurring Operational Requirements

The current DO #21 provides in §1.1 that -

"Donations are not to be used as offsets to appropriated funds or to meet recurring operational requirements."

This stipulation is not retained in the revised DO.

This omission, which is not mentioned in any of the NPS explanatory material concerning its revised DO, represents a fundamental (albeit unheralded) philosophical shift. It signals that the NPS intends to derive a significant and perhaps vital portion of its future operating budgets from corporate and other private donations.

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This shift is underlined in another un-noted change. The current DO provides that:

"Employees are not to portray Congress, the Department [of Interior], or NPS as having failed to meet their respective responsibilities." (§2.3)

However, the revised DO limits this prohibition only to "communications with donors or prospective donors" (§3.1.1). Thus except when soliciting donors, NPS employees would be free to state for public consumption that Congress underfunds national parks and that private donations are necessary for their daily operation.

This provision appears to provide a backhanded authorization to deploy this plea of poverty and use assertions of Congressional fiscal irresponsibility as an indirect or background fundraising tactic - to create a general public impression that parks cannot operate properly without robust outside financial assistance.

To our knowledge, no other federal land management agency explicitly encourages its employees to claim their operations are chronically underfinanced. Yet ironically, on an acre-for-acre basis national parks are far better funded than national forests or national wildlife refuges. Moreover, while the national park system has substantially higher visitation, visitation on national forest and wildlife refuges tends to be more intensive with hunting and fishing activities (outlawed in most parks) that require substantially more ranger supervision and enforcement to protect resources.

More significantly, however, the overall approach of the revised DO would be to move NPS away from its posture as a purely public agency and attempt to refashion it as a private-public joint venture. There is no statutory authority for such a fundamental shift in agency mission. PEER believes that if such a shift were to occur it should be sanctioned by statute and not accomplished on a stealth basis by a rewriting an obscure Director's Order.

3. Invites Ethical Conflicts with Few Safeguards Preventing Abuse and Scandal

The revised DO sets the stage for NPS "partnering" with corporations, business partners, associations and individuals. As envisioned, "philanthropic agreements" would be negotiated in return for naming rights, marketing tie-ins and other exchanges. These arrangements are fraught with threats to impartiality and public confidence which are not addressed by the vacuous and vague "Donor Review" provisions in the revised DO.

A. Unhealthy Corporate Embrace Encouraged

The current DO #21 is entitled "Donations and Fundraising." Indicative of its sea-change in approach, the revised DO is retitled as "Philanthropic Partnerships." In this vein, the revised DO is suffused with language about bonding with donors and a commingling of purpose. Thus, the revision states that these partnership arrangements should strive to "create community of practice and shared understanding, bringing the NPS and its partners closer together" to align "each other's organizational and ethical 'cultures.'" (§3.1.4)

Thus, the DO appears to define these philanthropic partnerships as something more than situational, or confined to the parameters of the funded NPS project. The language of the DO goes farther and suggests there should be a larger organizational bonding or identification.

This official identification with corporate donors is epitomized by the \$2.5 million "co-branding" campaign that NPS entered into in 2015 with Anheuser-Busch/InBev, the world's largest beer brewery. To consummate the deal, NPS had to waive its long-standing policy against identifying national parks with "alcohol or tobacco products." In its explanatory material, NPS points to this agreement as a model it seeks to promote and the revised DO proposes to completely drop the prohibition of NPS tie-ins with alcohol manufacturers and distributors. (§5.1)

The authorizing memo signed by NPS Director Jarvis on January 21, 2015 calls for "aligning the economic and historical legacies of two iconic brands...with a corporate entity that has the same goals surrounding relevancy, diversity and inclusion" so as "to distribute our brand across the country."

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This linkage of national park values with the corporate values of a brewery or whoever wants to give the agency money is profoundly misplaced. Moreover, it is hard to fathom precisely how NPS and Anheuser-Busch share "economic and historical legacies" or what that even means. It is also disconcerting to contemplate why national parks would strive to be rooted in the same notion of "relevancy" as a beer maker.

Although this type of gushing language may be dismissed as breathless hype, the partnership relationships suggested in the revised DO conveys that the NPS and its donors would need to develop a sense of shared interest and institutional mutuality. Precisely how this organizational melding is supposed to occur is never fully explained. Nor is it acknowledged that it will be far harder for NPS to exercise clarity of vision and the arms-length distance needed to protect public perception of its integrity and impartiality if issues arise from the desires or actions of a self-labeled "partner."

This embrace of corporations and outside interests around fundraising is fraught with ethical and organizational challenges which NPS has shown itself ill-equipped to handle.

B. No Safeguard against Corrupting Influence of Donations - No Lesson Learned from Coca Cola Debacle

The draft DO relies upon "integrity" safeguards contained in provisions tied to the time of the gift; that is, the initial decision to refrain from accepting any donation which appears "to be (such as by its size or circumstances), an attempt to influence the exercise of any NPS or Departmental regulatory or other authority" (§5.2.1) "or appear to influence any significant pending NPS or Departmental decision or action involving the donor's interests." (§5.2.2)

This firewall provides scant protection against the influence exercised by major donors - especially in an agency making itself increasingly dependent on corporate largesse. First, it should be noted that most of the corporate donations being solicited by NPS and the National Park Foundation are multi-million dollar gifts - presumably of sufficient size to carry a gravitational field of influence. However, since the overall thrust of the DO revision is to maximize donations, it is unlikely that NPS would ever reject a gift because it is too large.

Moreover, the influence of a gift does not end after it is accepted. It continues, in some part, due to NPS' hope that the gift is renewed. The draft's provision for annual review of donors is limited to "every year that the donor offers a donation" (§5.3) and contains no retrospective element. Thus, the pre-acceptance nature of reviews would not cover conflicts and opportunities to influence NPS actions arising months after the donor's check has been cashed.

A classic example of how this influence works in ways not covered by the draft revised DO involves the Coca Cola Company which used its contributions to temporarily halt a planned ban on the sale of disposable plastic water bottles in Grand Canyon National Park. Coca Cola makes the most popular brand of bottled water, Dasani, sold in the U.S. It was disturbed by the long-planned Grand Canyon water bottle sales ban due to the prospect of reduced Dasani sales.

The company was also a "Proud Park Partner" due to its generous contributions to the National Park Foundation. Documents obtained by PEER after filing of a Freedom of Information Act lawsuit indicate that the corporate gift influence NPS Director Jarvis to personally intervene by issuing an order stopping Grand Canyon from going forward with on January 1, 2011.

An email from then-National Park Foundation President Neil Mulholland to Jarvis warning about the consternation caused by the impending Grand Canyon bottle ban read:

"While I applaud the intent, there are going to be consequences, since Coke is a major sponsor of our recycling efforts."

The following June, Jarvis went further, directing, without public announcement, that no park may eliminate plastic water bottle sales so as to preserve "consumer choice" - the rallying cry of the commercial bottlers. An email from his lead staff person that month read: "the Director's view is NOT ban sale of bottled water, but to go the choice route" (emphasis in original).

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When asked by reporters about PEER charges that the National Park Foundation in essence successfully lobbied him on behalf of Coca Cola, Jarvis issued this blanket denial:

"My decision to hold off the ban was not influenced by Coke, but rather the service-wide implications to our concessions contracts, and frankly the concern for public safety in a desert park."

However, the documents obtained by PEER in our lawsuit against NPS showed that this statement had no basis in fact. NPS records reflect that public safety was not a consideration explicitly raised at any phase of its decision-making. Significantly, it was not even an item for discussion at a January 2011 summit with bottlers, concessionaires and park managers discussing the agency's bottle ban posture. Following that meeting, NPS developed follow-up research assignments which mainly revolved around economic issues; again, visitor safety was not an assigned topic for any further investigation.

These documents confirmed was obvious - corporate donations influenced national park conservation policies. This is a form of influence not deterred in the least by the revised DO even as it opens channels for repetition of the same dynamic on even a broader scale.

In addition, the role of Director Jarvis to alter policies to please a corporate donor and then dissemble about his actions does not bode well for any relaxed gift policy -especially with one casting him as the ethical speed governor for determining what is an inappropriate arrangement.

The Coca Cola episode is not an isolated example but part of a pattern. Under the proposed DO emphasizing a keep-the-customer-satisfied donor cultivation approach, one can reasonably expect such unseemly collusions to multiply.

Further, by encouraging park managers to actively solicit contributions to supplement park budgets, potential donors inevitably obtain much greater access to and influence over park decision-makers. Thus, park scientists, administrators or law enforcement personnel who find themselves involved with actions that affect donors' interests become inherently at risk for pressure or retaliatory action to prevent irritating or alienating a donor who is providing a measurable portion of that park's budget or is the key sponsor of a high-profile project.

By fostering an all-encompassing quest for donors, the proposed DO would become an insidious and pervasive corrupting influence on impartial park management.

C. "Prohibited Sources" Rule Has Troublesome Loopholes

The proposed rule would declare that "NPS policy is to decline donations from: Concessioners and holders of commercial use authorizations (CUA) or those seeking a concession contract..." (§5.1) The revised DO then imbeds two big loopholes allowing parks to accept funds from those with which it does direct business:

1. Co-Sponsorships. In another section (§ 3.13, second (h)), the draft DO authorizes superintendents to "Accept offers to support park activities through co-sponsorship of events by concessioners and others." Thus, through co-sponsorship of "events" (a term not defined) a prohibited source is transformed into an entity that has its donations accepted.

2. Donations to Partners. In a parenthetical clause the Prohibited Source provision states "this does not prohibit an authorized philanthropic partner from accepting donations from these sources for NPS projects." In other words, concessioners, vendors and others either doing business or seeking business from a park may channel unlimited donations through the parks "friend" group or other partner. Similarly, these businesses could also seek donor recognition and other acknowledgement so that the scope of their generosity is unmistakable.

As the draft DO makes clear while indirect donations to NPS are subject to vetting, general donations to philanthropic partners "are not subject to NPS donor review policies." (§5.4) Consequently, this loophole undermines the appearance of integrity and impartiality which NPS purports to maintain.

It is highly questionable for any federal agency to accept, let alone solicit, funds from businesses seeking concessions from it either directly or indirectly.

4. Diverts Tax Dollars to Donor Databases, Background Research and Other Fundraising Overhead Expenses

The revised DO designates two-high level Washington Office officials whose full-time job would be to direct donor solicitation and cultivation operations: An Assistant Director for Partnerships and Civic Engagement (§3.1.6) and a Division Chief to run a re-named Office of Partnerships and Philanthropy (§3.1.7). These officials would serve as generals overseeing a gift-seeking army.

Among the duties that these positions would perform are activities that are questionable uses of tax-dollars, such as -

- "Develop and maintain a database" on potential and actual donors (§3.1.7);
- Conduct background checks on potential and current donors (§5.3); and
- Conduct "feasibility studies...to assess the likelihood that a fundraising effort or campaign will be successful" (§6.2.6).

Use tax dollars to pay for these philanthropic overhead expenses, especially building dossiers on current and prospective donors, will be controversial. The notion of NPS dollars diverted to conduct market research to evaluate fundraising pitches will also raise eyebrows.

Moreover, these donor research and cultivation activities can be quite expensive. For example, a PEER analysis of personal contributions to the National Park Foundation indicates these gifts are far more likely to be absorbed by overhead, fundraising expenses or the care and feeding of corporate donors. In Fiscal Year 2011, less than one-third of National Park Foundation expenditures were grants to parks (\$4.5 million). A greater amount (\$4.7 million) went for fundraising and administrative expenses. Another \$.5 million was spent on "program support" - a nebulous category that ranges from promotional materials for corporate donors to the hotel bar bill following the National Christmas Tree Lighting.

The revelation that a federal agency will be spending large sums of taxpayer dollars on cultivating corporate and individual donors may also cause negative reactions which may undermine public support for national parks generally.

5. Vastly Expands Sales of Naming Rights

To encourage large donations, the proposal substantially liberalizes rules on what is called "donor recognition." This liberalized recognition policy would have the effect of subjecting the public commons to corporate branding campaigns in which companies are not selling their product per se but are selling themselves and their images.

The revised DO takes what is currently a deliberately understated fundraising tactic and greatly amplifies its scope and limits in order to attract more, presumably corporate, donors.

A. Ban on Commercialism Dropped

The current DO states an "NPS policy that parks be free of commercialism..." (§10.2) This language disappears from the revised DO.

The fact that the draft directs NPS managers to meet "the needs of donors" (§8) is implicit recognition that donor recognition is a thing of value conveyed in exchange for the donation. In effect, NPS, using the rhetoric of donation, is, in reality, selling public space to corporations for display of their names and corporate symbols. Under this revision, the difference between widespread donor recognition and paid advertising become elusive.

B. Donor Recognition Becomes Mandatory

The draft DO is quite explicit that superintendents are required to offer donor recognition in park facilities, materials and programs:

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"All parks and programs that receive, or expect to receive, donations must have a donor recognition plan." (§8.2)

The revision stipulates that these plans must be approved by "Regional, associate and assistant directors." Moreover, any "plans that deviate from the [national] template" require Headquarters sign-off. (§8.2.1)

C. Significant Expansion of Scope of Naming Rights

The revised DO would lift several restrictions in the current DO which limit donor displays (see §§10.2, 10.2.1 and 10.2.6). The current DO stresses that such donor recognition should be "short, discrete, [and] unobtrusive." (§10.2) In contrast, the revised DO contains no such stipulation. Instead, the draft DO lists as the first consideration in designing donor displays should be the "needs of the donors." (§8)

To further this aim, the revised DO would repeal several restrictions in the current policy. Thus, the revision would allow donor, including corporate recognition and logos, to be displayed on -

- Park furnishings;
- Benches;
- Theater seats;
- Rooms and other "interior spaces";
- Landscaped areas;
- Food lockers;
- Paving stones; and
- Vehicles. (§8.5.2)

In addition, "temporary signage" featuring donor recognition would be allowed for periods up to five years. It is not clearly stated what, if any, limits apply to temporary signage.

The net result of all these relaxations is that national parks will increasingly become venues for product placement. Other than the natural vistas themselves, everywhere in developed areas of parks where a visitor looks - benches, equipment, free-standing display, paving stones and park vehicles - he or she will see corporate branding.

The proposed open-door policy for corporate donor recognition makes no provision allowing managers to selectively refuse recognition to one corporation that is offered to others. As a result, there will no means to consider the cumulative effect of donor recognition that becomes so increasingly pervasive that it negatively affects the visitor experience.

D. Use of Logos Allowed

The current DO limits display of corporate logos to a "credit line on printed or electronic material, audio/video/fil products and temporary construction/restorations signs." (§10.2.1)

The revised DO drops that restriction and instead states:

"The use of corporate name scripts or logos may be a proper form of donor recognition in some circumstances." (§8.7)

It does not elaborate, however, on what those circumstances might be.

The revised DO is laid out in a form that suggests that what is allowed at one park will be presumptively be allowed at all parks. As a result, the draft may set off a corporate display arms race where more and more prominent displays are dangled by superintendents pressured to raise outside funds. This will inevitably result in few places in the common areas of national parks remaining off-limits to the Nike swoosh or the McDonald's arches.

6. Entangles NPS in Corporate Marketing Schemes

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The revised DO would significantly expand the ability of the NPS to participate in "monetary, marketing and other forms of [corporate] support for NPS activities." (§4.4) The proposed limits on these arrangements appear to be vague and reliant on subjective concepts such as "strategic co-branding, quality and mission alignment." (§6.4)

The cumulative effect of this mass commercialization of national park images is to cheapen the brand and threaten to transform "America's Best Idea" into just another idea for promoting corporate products.

A. Virtually Limitless Corporate Co-Branding

The revised DO would authorize NPS to license park and landmark names, as well as secondary logs for corporate use. The only limit is that "The NPS arrowhead mark will not be licensed for use." (§6.4, Emphasis in original). Yet the provision allows "negative space arrowhead/arrowhead outline" to be licensed.

In addition, the revision would drop the current prohibition on licensing use of NPS uniforms or employees, such as park rangers: "The NPS will not allow... an NPS employee or any part of the uniform to be featured in any advertisement that promotes a corporate brand, service, product, or enterprise". (§7.0)

Commercial use of national park symbols, employees and their uniforms carries with it a tacit official endorsement which makes the revised DO's prohibition against statements of NPS official endorsement superfluous.

In addition, once one superintendent agrees to appear in or supply a statement for a corporate ad, every other superintendent will be hard pressed to refuse similar requests.

It also appears to be assumed that co-branding is intended to allow corporate contributors to use their donations to burnish their corporate images. Thus under this revision, a company such as Wal-Mart could run television advertisements portraying it as a caring corporation starring a park ranger who extols Wal-Mart's generous contribution to a national park. Similarly, oil companies, such as Exxon-Mobil, would be allowed to run ad campaigns featuring various national park symbols saying the multi-national corporation is a good neighbor because it donated money to enhance wildlife habitat in parks.

The only limits on these co-branding campaigns is the discretion of the NPS Director after a somewhat vague vetting process which has no firm standards and instead relies upon bullet points of considerations such as "Protect brand integrity, including the use of NPS marks." (§5)

These proposed co-branding arrangements will be the brainchildren of corporate advertising firms - not known as paragons of good taste. As a result it is not hard to imagine co-branding efforts linking -

- Old Faithful and erectile dysfunction products such as Viagra;
- The Statue of Liberty and lingerie lines such as Victoria's Secret; and
- The Lincoln Memorial and hemorrhoid creams.

B. Co-Branding Through Scandal

There is no shortage of recent situations where seemingly upstanding corporations are suddenly found to have engaged in questionable and often outright illegal behavior. Consequently, NPS "partnering" and "co-branding" with corporations is fraught with peril for the NPS brand when these corporate partners become scandal tarred.

Consider the type of partnerships NPS could have consummated had this revised DO been in place during past years -

- BP co-branding with national seashores on the eve of its massive Gulf spill;
- Volkswagen diesels becoming official national park vehicles before emissions cheating was discovered; and

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→ Partnering with Enron to focus on neglected park infrastructure in the months before the infrastructure giant itself imploded.

Moreover, corporations flirting with potential scandal may, in fact, have more interest in co-branding with a so-called white hat entity such as natural parks. Nor does NPS have the acumen or the research capacity to sniff out potential disgrace brewing behind boardroom doors.

NPS co-branding agreements with corporations that are then seared with scandal risks damaging the NPS brand and the public's regard for the agency's integrity. In short, the revised DO flies in the face of the old adage about getting up with fleas if you lie down with dogs.

C. Alcohol Tie-Ins

The revised DO drops long-standing NPS policy forbidding association of national parks with alcoholic beverages. The revised DO declares:

"After the effective date of this Order...the NPS will permit - after thorough review - philanthropic partnerships with, and will accept donations from, corporations that produce or distribute alcohol." (§5.1)

Other than noting this change, NPS materials did not explain the basis for this change or seek to justify it other than to note that it had waived the prohibition in 2015 in order to authorize a co-branding campaign with Anheuser-Busch brewery (see Comment #3, above). Three months after inking this agreement, Anheuser-Busch unveiled its two-year "Up for Whatever" campaign featuring the slogan "The perfect beer for removing 'no' from your vocabulary for the night" on Bud Light bottles. The company has since apologized for this slogan while pushing 139 other "light hearted" labels. It also plugs a promotion of "all things beer" called "Let's Grab a Beer" to hike suds sales.

Despite proposing a national policy embracing alcohol tie-ins, NPS has not issued any analysis of how well this partnership with this brewery has worked out or how the NPS mission was furthered beyond the \$2.5 million payment from the company. The only categorical prohibition the revised DO would retain is "with tobacco or any type of illegal products." (§5.1)

The rationale for accepting co-branding with alcohol - a product with huge social and public health costs - while denying such arrangements with tobacco is not clear as tobacco is not illegal in this country. Why is identification with a bourbon appropriate co-branding for a national park but not the cigar one might smoke with it?

With this one exception, the revised DO makes clear that tie-ins with every other legal product or service would be potentially acceptable. Thus, national parks could co-brand with casino gambling, contraceptive devices, religious organizations, pesticides, X-rated movies, spray paints, exotic dance clubs, dating websites and a limitless array of other products and services for whom tie-ins with parks raises a number of knotty questions which NPS may be ill-equipped to address.

D. Dubious Cause Marketing Authorized

The revised DO also explicitly authorizes "cause-related marketing" in order to "co-brand with a corporation" in a manner which "achieves a purpose, inspires passion, and generates profits." (§4.4.1)

No example is given of instances where NPS has ever lent its "logo or mark" as envisioned in this provision to a cause-marketing campaign. Thus, it is unclear what range of non-park projects or causes NPS will allow itself to promote. However, NPS official involvement with one charity may disadvantage other, competing charities for limited public philanthropy. It is questionable that NPS should seek out in order to promote "corporate social responsibility." (§4.4.2)

7. Privatizes Park Interpretive Programs

The revised DO recognizes Cooperating Associations (§3.3) and identifies them as "Strategic Philanthropic Partners." (§6.1)

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Under another DO (DO 32: Cooperating Associations), these cooperative associations have access to park facilities, may charge visitors for lodging and provide interpretative services for park assets. That DO further provides:

"While the NPS cannot guarantee the profitability of an Association, it is dedicated to promoting a sustainable business environment." (§6)

These cooperative associations can operate, essentially, as a private park service inside a national park. Through this DO revision, NPS could go even further and assist the cooperative association in fundraising without any defined limits.

There is nothing barring a national park from entering into a strategic partnership with a cooperating association which would enable the latter to take over all or nearly all interpretive functions, displacing civil servants with private non-profit employees not on the government payroll or eligible for government benefits.

Thus, through these incremental internal orders, NPS may be able to transform itself into a non-profit allied organization which provides the bulk of visitor services. Such changes have received scant outside scrutiny or public involvement.

8. Puts NPS into Competition with National Park Foundation and Friends Groups

Under the revised DO, NPS would undertake many of the donor related tasks now performed by the National Park Foundation and park support groups (often called "Friends Groups"). Under the revised DO many of their activities would become superfluous and assumed by NPS employees.

Moreover under the revised DO, these various groups can operate only under formal agreements negotiated with NPS: "Philanthropic partners are required to have written agreements with the NPS." (§6.2)

If, for whatever reason, NPS became displeased with a Friends Group or other philanthropic partner and refused to execute an agreement under the terms of the revised DO that entity would not be able to operate. This posture appears to give NPS near dictatorial power over private associations seeking to benefit national parks. These outside organizations would risk their existence by publicly criticizing or disagreeing with any national action, decision and policy.

9. Increases Donation Pressures on Park Visitors

While the current DO authorizes what it terms "In-Park-Friend-raising" (§6.3) and donation boxes on park property (§6.3.1), the revised DO would make it easier for park personnel to importune funds directly from visitors with proceeds going directly to the park.

The revised DO stipulates that "Donation boxes must clearly inform the public how the NPS or its partners will use the money. Without this information, moneys collected in a donation box must be considered miscellaneous receipts and deposited to the U.S. Treasury." (§4.6.2.)

Besides donation boxes, visitors can be hit up to donate when they leave the park under a "Checkout Counter Donation Program." (§4.6.3)

The revised DO also authorizes indirect fundraising pitches to visitors by park personnel:

"Without personally soliciting donations, NPS employees may, when asked, offer information about NPS and park needs, as well as, discuss the opportunity to support the park..." (§4.6)

The public already pays twice for national parks, once with taxes and again with the steadily rising visitor fees charged at entrance gates. The revised DO would encourage parks and their partners to take a third or more shots at the visiting public's wallet.

Depending upon how aggressive a park may be in pointing out its needs, this non-interpretive information may color visitor experience, especially if every park employee encountered is poised to function as a fund pitch-person. In addition,

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confronting visitors with a welter of donor recognition displays further reinforces a feeling that requests for money are a large part of what will become the national park experience.

9. Provides No Greater Accountability over Use of Funds

Although it is clear that the thrust of the proposed DO revision is to increase donations from outside sources, it provides for no additional public accounting of the funds thus donated. The language in the current DO (§3.3) is almost word-for-word identical to the language in the proposed revision (§4.8). Both require that donations be "deposited in a donation account, be accounted for and disbursed using the same standards and procedures used for appropriated funds."

However, the revised DO encompasses a wide range of funding channels -license revenue, co-branding funds, cause-marketing, special events and many others - which would be either wholly new or are not widely utilized currently. Besides much greater accounting complexity, the proposed DO does not require NPS to report annually or on any other basis about the totality of funds flowing from the far flung corners of a new world of philanthropic partnerships.

In addition, these accounting rules apply only to NPS and not to the cooperating associations, corporate donors and other partnering entities. These outside groups directly expending funds on park-related projects are not required to accounting review at all.

As a consequence, individual parks may be able to amass the functional equivalent of off-the-books slush funds of donated funds that are not subject to oversight or reporting requirements - and certainly not as rigorous as those for congressionally appropriated funds.

This lack of accountability has two dimensions: 1) opacity or secrecy surrounding particular corporate or foundation gifts and 2) absence of any cumulative reporting that provides the public an accurate picture of each park's various revenue streams.

The National Park Service should provide some sort of mechanism whereby private partnership agreements may be reviewed and commented upon by the general public. In addition, NPS should specify some measure of transparency so that the end use of donated funds can be traced by members of the public and so that the total amount of donated funds received by a park can be generally known.

11. Relies upon an Ethically Challenged Director as Arbiter of Propriety

Recently, the Interior Inspector General (IG) uncovered a string of ethics violations by NPS Director Jarvis in connection with a book about national parks that he authored. The IG found Director Jarvis -

- Approached a concessionaire for whom he had just signed an agreement for operating 138 park stores to publish his book, thus flouting conflict of interest prohibitions;
- Kept the copyright for the book in his own name, contrary to the ban on compensation for work relating to one's job duties;
- Used government equipment and staff time for his personal project, while misusing his office, as the book made repeated references to his position;
- Improperly approved display of the official NPS Arrowhead logo on the book jacket; and
- Ignored repeated warnings that he needed to obtain ethics approval for the book (which he avoided because he did not want it edited by Interior officials).

To top it off, he then lied to his superior, Interior Secretary Sally Jewell, telling her that the concessionaire had approached him with the book idea - when in reality it was the other way around. Further, Mr. Jarvis sought to conceal his violations by creating a phony email trail. He also sent Secretary Jewell a note with a copy of the newly published book which falsely declared "there are no ethics issues." (Emphasis in original)

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Incredibly, the subject of his book is ethics and is titled "Guidebook to American Values and Our National Parks." At the time of the IG report in February 2016, the book had only "sold" 228 copies -not counting the 50 or so Mr. Jarvis has sent to staff and friends. As a result, his "publisher" is out several thousand dollars for his powerful patron's vanity project.

The Interior Department punished Mr. Jarvis by issuing him a written reprimand and stripping him of any supervisory responsibility over the NPS ethics program for the remainder of his tenure.

Under the revised DO, however, Director Jarvis would be the ultimate arbiter of what corporate tie-ins are considered "appropriate" and "tasteful." However, Mr. Jarvis' record gives pause regarding the soundness of his judgment. Moreover, his philosophical orientation and past actions suggest that Mr. Jarvis has yet to meet a "partnership" arrangement that he would not enter.

PEER urges that NPS withdraw this proposed DO revision until after Mr. Jarvis has left his position in order to obtain a more dispassionate review by his successor.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 14

Author Information

Keep Private: No
Name: CRAIG
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Mount Vernon, IA 52314-9578
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I'm very sorry to see the National Park Service proceeding in this dangerous direction. As a student of the Park Service and its history, I am well aware that the early history of the National Park Service involved very close collaboration with railroads and other private sector operators with their own interests and motivations. Although some of the infrastructure development facilitated by that collaboration was valuable, the National Park Service in this era also undertook wide variety of co-marketing efforts that are now widely recognized as having been extremely inappropriate. Those activities included predator extermination to increase the number of "good animals," tree tunnels, the Yosemite fire fall, bear feeding stations, the promotion of Native Americans as tourist attractions, and a book by the NPS director that explained the "correct way to feed candy to bears." This effort to gin up "philanthropic partnerships" will inevitably influence park management to adopt policies in the interests of their corporate overlords.

Please enter these comments in the public record.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 15

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Newport, OR 97365
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am opposed to all public recognition of corporate sponsorship and/or donations to the National Parks Service, including display of logos and naming rights. Reasons for my position: 1. We human citizens whose taxes pay for the parks do not get individual recognition for our "donations" with plaques displaying our individual names (a human writes their name on an object in a Park, they are subject to arrest for vandalism). If corporations want to donate they should accept all aspects of their "citizen" identity and not expect nor receive public recognition. 2. Funding shortages to support the Parks is due in large part because corporations do not pay their fair share of taxes. Park officials should use their influence with Congress to ask Congress to require corporations to pay more taxes and allocate portions to the Parks sufficient to repair, operate and maintain the Parks rather than spending their influence requesting corporations to donate. 3. There is already too much commodification of everything in the U.S., including Parks and other aspects of nature. Let the Parks continue to be free from commercialization. 4. Corporate sponsorship of aspects of Parks is another step in the efforts to privatize all Federal services. Keep the Parks part of the commons, collectively owned and operated by all of us human citizens. In conclusion, leave the Parks natural without displays of commercialization. 5. There is an inherent conflict of interest when the Parks ask for and corporations provide funding for the Parks. A corporate "gift" results in the Park's indebtedness and places pressures on the Parks that results in the Parks acquiescing, consciously and unconsciously, to spoken and unspoken positions or demands of corporations when those are counter to the best interests of the Parks.

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Correspondence: 16

Author Information

Keep Private: No
Name: Margaret
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98109
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is of concern on so many levels. The need for looking elsewhere for corporate money is the direct result of subsistence funding by Congress to the National Park Service for decades. An \$11-billion maintenance backlog does not resolve itself. However, as seen with the recent trademark debacle in Yosemite involving the need to rename historic structures, the involvement of corporations in the process is fraught with the potential for it to degenerate in unexpected ways. Now, we are poised to start accepting millions of dollars of corporate sponsorship for decades, changing the fundamental nature of national parks. The more important the park is to people FOR THINGS THAT DON'T COMMONLY LIE OUTSIDE ITS BORDERS, the more alluring it will be to overlay and interject the trite signs of commercialism within it. It's another way for them to intrude their product in a venue where it will stand out. Finding such places for advertisers gets harder as we learn to tune them out in other more familiar arenas.

Many people come to national parks to GET AWAY from the persistence of the outside culture, to bathe in values and interests than are subservient to the demands of capitalism and capitalistic pursuits, associations that are finer and nobler: family, nature, culture, where we come from. Are you willing to be pursued by corporations even on your own vacation time? Whatever happened to the idea of parks as refuges, something indeed larger than choices of what to drink or drive? What happened to philanthropy by corporations simply because it was about doing good, and that was enough? This idea of continual needing to have a "personal" return undercuts the very notion of corporate service in general. Make no mistake: it is not service to the park, it is a business transaction.

Parks are about an individual relationship with our earth and our history and our background, not a corporate entity's relationship with the park. Will big pockets now get primary attention, much the way lobbyists dilute the politician's attention in Washington from the needs of the people? Is this the best we can do as a nation? Is it the model we want to interject because it already works so well?

I get it. Much good can be done with more cash in order to preserve and protect what we have. While I can acutely appreciate the need for infusions of cash, I'm a little frightened that this will ultimately lead the NPS into becoming just another cog in corporate wheels of the universe. Individual superintendents will have the ability to successively carve away at our tolerance of these symbols. Soon it will no longer matter that we are in a special place: Coke or Starbucks will be with us in branding and in our minds any place we go. The question is SHOULD they be ubiquitous, or is it already so? Where will be left that

we can go without their influence? I believe it changes who we are and dilutes what experiences we take with us: and our very regard for the areas we are in as someplace unique.

It is up to each generation to continue to save and maintain the legacy of our parks. What we choose to do - - or not to do - - will influence the way our children and their children experience them. This is a quiet, but a serious matter.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 17

Author Information

Keep Private: No
Name: Amanda
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Gainesville, FL 32608
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is a HORRIBLE idea. All corporations will do is tear down our National Parks. These rights seem small, but there isn't a doubt that the corporations will soon be able to control a hell of a lot more than just the names of the parks. (Using the word "just" loosely...) Once corporations begin to gain control over the National Parks, they become their bosses. This means that any employee of the park would work for this corporation now and would essentially have to listen to any changes the corporations would make in fear of losing their jobs. What's to stop the corporations from gaining more control once this occurs?? And WHY on EARTH are we using TAXPAYER'S dollars to FIND these corporations for this?? Wouldn't this be an advertisement opportunity for THEM? Shouldn't THEY be seeking the parks to sponsor and not the other way around? I don't support this at all, especially not enough to pay for it with my own tax dollars.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 18

Author Information

Keep Private: No
Name: Daniel
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Tallahassee, FL 32304
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/09/2016	Date Received: 05/09/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

I personally DO NOT authorize corporations to advertise or control the integrity of environmental national parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 19

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fort Bragg, CA 95437
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

If this were a voting situation, I would vote NO. I don't believe that corporations should have anything to do with running our National Parks. Being that this so called public review has been kept very quiet, it seems someone has a lot to hide. Thank you

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 20

Author Information

Keep Private: No
Name: Samantha
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Colver, PA 15927
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is a joke, right? Funding the NPS is Congress' JOB. I would be appalled to learn that MY TAXES were being used to basically advertise private corporations many of which I'm sure I do not personally support.

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Correspondence: 21

Author Information

Keep Private: No
Name: Noemi
Organization:
Organization Type: I - Unaffiliated Individual
Address:
San Francisco, CA 94122
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is probably inevitable but disheartening. I go to parks to get away from consumerism. Billboards steal our peace. They invade our space without our permission. I'm not naive, I'm just saddened.

I think some extremely specific regulations on how to implement this would go a long way.

For example:

1. No logos more than 1/2 mile from a parking lot. We already see logos in the parking lots on cars so keeping logos out of the back country would be big.
2. No logos on the same wall / sign / within 10' of an Arrowhead
3. Logos shouldn't be more than X amount of square feet per area / park / building or no more than some percentage of a wall etc
4. No logos directed to children under the age of 13 (they can sponsor a Jr Ranger booklet with words instead of logos)
5. No more than 4 different logos per space / wall / building

And for crying out loud - GET A LOT OF MONEY FOR THESE LOGOS!
It would be so embarrassing to go through all this for just pennies.

Children recognize more logos than plants and animals. These are the same corporations that use tax loopholes that keep the US budget where it is. If they would just pay their fair share the NPS budget might be twice as big and we wouldn't need to do any of this, so don't forget for one minute that they are not doing you a favor by providing sponsorship.

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Take a lot of their money and give them very little in return - in other words, treat the corporations the way they treat customers.

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Correspondence: 22

Author Information

Keep Private: No
Name: Mr. Enns
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Issaquah, WA 98027
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear God: Please protect us from the numbing mindlessness of those who think commercialization of this nation's parks and natural spaces is even up for consideration! Amen.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 23

Author Information

Keep Private: No
Name: Tristan N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bend, OR 97703
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/09/2016 Date Received: 05/09/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is a shameful solution for a problem we've all created. Allowing corporate and private interest to dictate our tax structure has eroded our hold on the places designated for "benefit and enjoyment of the people" I'm sure Roosevelt would turn in his grave if he knew the term "people" was now so loosely defined.

This is a symptom, the problem is unscrupulous politics, apathetic and disenfranchised voters, and ultimately Citizens United. Address that nonsense before we go mortgaging fixtures in the places that exemplify our history.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 24

Author Information

Keep Private: No
Name: Jack
Organization:
Organization Type: I - Unaffiliated Individual
Address:

New York, NY 10001
USA

E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

While the need for new and larger sources of funding for the NPS is crucial for the continuation and upkeep of this incredible resource, plastering our parks and landmarks with corporate branding is definitely not the way forward.

Our parks are a refuge from the constant barrage of media, advertising, and overstimulation we deal with every day. To extend these influences into our parks and landmarks doesn't just miss the point, it goes against their very purpose and shows a lack of respect and consideration for all of your visitors.

Please keep our parks and landmarks as the places of refuge and relaxation that they are meant to be!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 25

Author Information

Keep Private: No
Name: Michael
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Avon, NC 27915
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Absolutely opposed. National Parks are a refuge from what we have to see every day: Advertising. It conflicts with what the parks are all about: Peace and relaxation.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 26

Author Information

Keep Private: No
Name: Rachel W
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Rome, GA 30161
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

There are some of us concerned that this will allow for the eyesores that are corporate logos and advertisements to mar the beauty of the park. Allowing for a more flexible donation program is a way to fill pockets, but let's not sell-out (and therefore essentially destroy) our nation's natural beauty to do so.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 27

Author Information

Keep Private: No
Name: Rebecca
Organization:
Organization Type: I - Unaffiliated Individual
Address:
San Diego, CA 92102
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

One of the best things about going to the National Parks is the ability to escape the trappings and commercialism of modern life. You feel like you have stepped away and are somewhere separate and untainted. Everything in this country seems to be covered in advertising and product placement. This is a place to take a break from that. The National Parks are something this country should take a lot of pride in and that fact that it is owned by the American People without corporate partnerships or sponsorship is one of the things that make them special. Please reject this proposal.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 28

Author Information

Keep Private: No
Name: Jerry
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Lynnwood, WA 98087
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

People go to the national parks, to leave behind a society that is saturated with advertising. I see this as a rule that would detract from the value of our national parks, the very best part of which, is untouched by this sort of thing. There is no other place in our country that is not saturated with some companies branding except our national parks.

Please reconsider this idea with the notion that me, my children and all of my ancestors since the park service has been created, have been paying for these parks as well.

I do not want my family crest or any other brand, attached to something, whose value is that it is generally pristine and owned by all of the citizens of our nation.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 29

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fairmont, WV 26554
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

NO commercialism in our National Parks!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 30

Author Information

Keep Private: No
Name: Kenneth
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Naperville, IL 60563
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please keep all forms of private corporation influence, including and especially corporate sponsorships, away from our National Parks.

Our National Parks' biggest "product" is natural beauty. Any corporate advertising in a National Park essentially defaces that natural beauty. This insults anyone who actually takes the time to go to a National Park.

Many people go to National Parks to get away from the incessant advertising on our TVs, mobile devices, billboards, etc. Please don't allow the despoiling of our National Parks in this way.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 31

Author Information

Keep Private: No
Name: Liam
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Brooklyn, NY 11218
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

" Anheuser Busch/InBev ability to sponsor the Find Your Park campaign of the Centennial - - lifts ban on alcohol co-branding specifically for this corporation."

There is no reason one single company (Anbev) should be granted a waiver to allow them to promote the NPS. A single waiver, granted to alcohol producers for the centennial, would be a much fairer application, and would increase the odds of funding beyond whatever Anbev has decided it wants to contribute. I would recommend an RFP rather than unilaterally granting a waiver to a single multinational corporation.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 32

Author Information

Keep Private: No
Name: Edward
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Apple Valley, CA 92307
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am very concerned about this proposal. While it seems that corporate sponsorships would help fund the National Park Service, I consider such sponsorship as a slippery slope which would undermine the integrity of the Parks. We are already in a situation where concessionaires have inordinate influence over Park policies, sometimes to the detriment of Park resources in order to guarantee and maximize profits. I can easily see a situation in which Park Managers are rated by the extent in which they solicit corporate sponsorship, without regard as to how good this is to the Parks themselves. This proposal should not be adopted.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 33

Author Information

Keep Private: No
Name: Scott
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Oyster Bay, NY 11771
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The Corporatization of our nation's National Park sites would be an abomination and betray a century of hard work by those interested in the public good. DO NOT SELL OUT THE PARKS!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 34

Author Information

Keep Private: No
Name: Rachel
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Minneapolis, MN 55406
Minneapolis, MN 55406
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please retain our National Parks- -and our wild spaces- -as public spaces, not tied to corporate entities in the form of sponsors. We don't need more branding, more signage, more corporate presence in our world. We need to move away from this model, as it has proved nothing but debilitating for our long-term good as a nation as especially as stewards of the environment. As a long-time park user, and as someone who has seen the kinds of burdens of debt that accompany this basic PR and fundraising package in other public spaces, I strongly advise the Parks Service to consider alternate methods and opportunities for supporting these most critical lands.

Rachel Moritz
Minneapolis, MN

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 35

Author Information

Keep Private: No
Name: Judith
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Philadelphia, PA 19143
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Don't commercialize our national parks! I know you guys are strapped for cash but this is not the way to go.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 36

Author Information

Keep Private: No
Name: Gregory
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Baton Rouge, LA 70808
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear Secretary Jewell:

Our National Parks are "our" treasures. They belong in toto to the body politic of this great nation. To denigrate them to the status of advertisement for corporate gain/greed is a disgusting idea. I want to visit Yellowstone National Park NOT Chevrolet Park or McDonald Arches Park.

What if the "park sponsor" decides to have a "private event" in one of our great places on the 4th of July weekend? Does that means that the citizen's would be locked out?

We already have way too much money influencing politics and the conduct of government business. Government IS NOT AND NEVER SHOULD BE a business.

I am concerned about pending plans for the National Park Service to pursue corporate partnerships. These partnerships threaten to corrupt our national parks by -

- Letting corporate contributions influence park policies;
- Turning public servants into corporate fundraisers while diverting tax dollars to recruit and cater to corporate donors; and
- Plastering corporate logos across park fixtures, selling naming rights and licensing park images for commercial products.

Prostituting our parks is precisely the wrong approach for saving them. The role of the National Park Service is to protect and steward park resources, not to fund raise-which should be left to private "friends" groups or the National Park Foundation.

Please halt this misguided plan. Thank you.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Sincerely,
Gregory

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 37

Author Information

Keep Private: No
Name: Chris
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Timonium, MD 21093
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This proposal is badly misguided. I object to allowing all this commercialism in our parks. Please reconsider and revise this plan.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 38

Author Information

Keep Private: No
Name: Jane
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98117
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thanks for opening up this draft to public comment. As a supporter and regular visitor to our National Parks, I welcome this opportunity to share my thoughts.

I understand that the NPS is severely underfunded by the Congressional budget, and I see the need for additional development. But having read the philanthropic partnership provisions in the draft, and I must express my disapproval.

Obviously NPS cannot run on the small cash/on-site contributions made by someone like me (the type of person who camps, hikes, and practices "Leave No Trace" in our parks. And sure corporations should be able to donate just like private individuals. However, I do not think advertising in any sense should be allowed. I cringe at the thought of the idea of the "Grand Canyon sponsored by Budweiser". I can just imagine all extra time and resources spent on the additional accidents. I know people are going to drink, but this kind of relationship endorses drinking and recreating in National Parks. Just think about that.

As for advertising in general, this is not what our parks are about. I visit the parks to escape the mediated world of consumption, not to bask in it. Now the director wants to change the policy to allow the infiltration of the commercial into our country's refuges from "life", simply because the agency is short on funds. There are other ways to generate cash flow without having to go this far.

I know there's a lot of money to be had, and I know the stakes for access to that money has changed. But if this new policy is implemented, the quality of the parks will diminish, NPS will lose a family of regular visitors who truly care about the parks, and chances are that the returns won't be as great as everyone has imagined. That is the nature of incompatibility. National Parks and corporate advertising do not mix.

Thanks for your time.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Respectfully,
Jane
hiker, climber, camper, musician, parent

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 39

Author Information

Keep Private: No
Name: Tammy
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Copper Hill, VA 24079
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The provisions that permit Branding & Logo Sharing, Sponsorships, and Donor Recognition are distasteful, as they compromise the values represented by our natural heritage and open space. National Parks were established only through hard fought battles against corporate interests. Corporate interests harm our National Parks on a daily basis. The proposed Director's Order #21 rewards corporate interests for their continued assaults on open space.

The whole scheme is a pathway to corporate control of our National Parks. I was just in Glacier National Park, and I want to go back; don't fuck it up. No one wants to see corporate logos in Glacier, or any other National Park, and no one should be confused by a National Park logo on privately owned property or messaging.

Don't "Cokefy" our National Parks.

"Nothing dollarable is safe." ~John Muir.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 40

Author Information

Keep Private: No
Name: Marcia
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Oakland, CA 94618
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I strongly oppose any commercialization of our National Parks. The parks should be completely free of corporate branding or any kind of advertising. Park managers should not be spending their time soliciting donations from companies or wealthy individuals.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 41

Author Information

Keep Private: No
Name: Justin N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Tucson, AZ 85745
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

This is a clear violation of ethics and morality, and likely of law.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 42

Author Information

Keep Private: No
Name: John
Organization:
Organization Type: I - Unaffiliated Individual
Address:

East Orleans, MA 02643
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I oppose the National Park Service plan to pursue corporate partnerships, because it is a sellout of the public interest to corporate profits. These partnerships threaten to corrupt our national parks by -

- Letting corporate contributions influence park policies;
- Turning public servants into corporate fundraisers while diverting tax dollars to recruit and cater to corporate donors; and
- Plastering corporate logos across park fixtures, selling naming rights and licensing park images for commercial products.

Prostituting our parks is precisely the wrong approach for saving them. The role of the National Park Service is to protect and steward park resources, not to fundraise-which should be left to private "friends" groups or the National Park Foundation.

Please halt this misguided plan. Thank you.

Sincerely,

John

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 43

Author Information

Keep Private: No
Name: N/A Molly
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Minneapolis, MN 55406
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please don't allow our parks to be named after corporations. Keep capitalism out of our natural national beauties. Donations and partnerships should be charity and support, not advertising.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 44

Author Information

Keep Private: No
Name: Robert
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kerrville, TX 78028
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I have just learned of a hair-brained plan proposed by the National Park Service, and apparently supported by the Secretary of the Interior, to turn the national parks into a fund-raising machine by soliciting corporate funds and sponsorships. As a former employee of the Texas Parks & Wildlife Department, who spent 20 years promoting Texas State Parks and conservation, I see this as a terrible idea. America's "best idea" - - national parks - - were never meant to make money, but to conserve America's wonders of nature, its wildlife and historical landmarks. Corporate money could, and likely would, influence how parks are run and their priorities. There is already way too much corporate domination of our society and national parks should remain one of the last bastions of true America, untouched and unsullied by corporate greed. Please shelve this plan and bury it forever!
Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 45

Author Information

Keep Private: No
Name: Greyson
Organization: Better Together NYC
Organization Type: I - Unaffiliated Individual
Address:

Brooklyn, NY 11215-1360
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please reject this terrible proposal. I work with LGBTIQ asylum seekers, asylees, and other immigrants across the US. This proposal would in effect potentially be retraumatizing and insulting to many of my clients, who have fled homophobic and transphobic persecution and sometimes violence to resettle in the US. Many of my clients have experienced the complicity of private corporations and even some NGOs in their suffering, and to declare the possibility of some of these organizations having branded presence in publicly-owned and operated lands sends a clear message: this government cares more about profit than about the well-being of some Americans.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 46

Author Information

Keep Private: No
Name: Stephen
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Monarch Beach, CA 92629
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Disney is not going to be bringing you Yosemite National Park any time soon, nor, as some have worried, is Viagra going to sponsor Old Faithful, at least not this year. But the plan being pushed by National Park Service Director Jonathan Jarvis, set to take effect at the end of the year, would allow corporate donors to display their logos on and in parks. It would also grant naming rights to corporations on key, highly visible park infrastructure, like educational displays.

What a sad day, when America's best idea has to whore itself for a few dollars here and there.

Perhaps we should not be surprised, given the man behind this move. Jarvis, who oversees 22,000 employees, 220,000 volunteers, 84 million acres of American lands, and a budget of around \$3 billion, recently had his hand slapped for writing a book on national parks for a private company-on his government-issue iPad-and was rebuked for the ethics violation. He also wrote his boss, Interior Secretary Sally Jewell, that Eastern National contacted him to write the book, when in fact he approached them.

Jarvis was officially reprimanded, was removed from overseeing the NPS ethics division, and will have to take ethics training once a month for the rest of his career. When asked by investigators why he didn't clear the book with the Department of Interior Ethics Office, he said, "I think I knew going into this there was a certain amount of risk. I've never been afraid of a risk...I've gotten my ass in trouble many, many, many times in the Park Service by...not necessarily getting permission...I've always pushed the envelope."

Indeed, in the mid-2000s, Jarvis reprimanded Rainier National Park Superintendent David Uberuaga for selling his house to a park concessionaire for three times the assessed value, then turned around and made him the superintendent of Grand Canyon National Park, one of the plum positions in the Park Service. That's suspect judgment-at best.

Two questions need to be asked in the face of this new policy: Does the Park Service need the money? And is this kind of public-private menage a deux what we want from our national park system?

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

First, the money. NPS has a budget of approximately \$3 billion. It claims a repair and maintenance backlog of more than \$11 billion. Simple math says, yep, it needs the money.

And maybe it does. But critics charge that many of the projects in the maintenance backlog are unnecessary, or part of wish lists, or just padding. Let's say, arbitrarily, the real amount is close to \$8 billion. That's still a tremendous amount of money.

But the parks, even though they weren't created to be financial investments, are one of the best investments in the federal portfolio. For every dollar the government spends on parks, a 2014 report found, ten dollars are created. From the \$3 billion budget at the time, \$30 billion was spurred in economic activity. Some 277,000 private sector jobs are connected to national park spending.

By any measure, this would seem to be a bargain.

"National parks cost us very little," noted the National Parks Conservation Association last fall, "The entire budget for the National Park Service is a tiny 1/15th of one percent of the federal budget and the average American household pays as much for our national parks each year as it would cost to buy a cup of coffee."

These are not good times to be asking Congress for money for public lands, we all know that. Those weasels dragged their feet on the Land and Water Conservation Fund, which is funded from oil and gas leases, and refused to reauthorize the ultra-popular program until they finally capitulated late last fall. Asking for extra bucks to chip away at NPS maintenance? Good luck. But if a 10X return on investment isn't a good one, go see Bernie Madoff. If Congress designated just 10 percent of "my" backlog, \$800 million a year, it would be done in a decade

I know. Good luck with that, too.

More important than financial considerations are aesthetic ones. What, exactly, do we want our national parks to be? Should they be primped and pretty, with amenities at every turn? Should they have modern visitors centers and comfortable lodging and wi-fi in the campgrounds? Just how many interpretive displays do they need, anyway?

The modern national park was born in the late 1950s, when the Park Service launched a massive undertaking called Mission 66, to spruce up the system in time for the service's 1966 50th anniversary. The system had fallen into neglect in the 1940s, and some even called for the parks to be shut down until they were cleaned up. But Mission 66 did more than straighten the photos and dust the credenzas-it brought a new, development-friendly attitude to the parks.

The style of buildings, for example, underwent radical change. Most of the park structures were created in the 1930s by the Civilian Conservation Corps in a style called National Park Service Rustic, also known as "parkitecture." Mission 66 replaced these with soaring, modernist structures like the Cyclorama Building at Gettysburg, designed by famed architect Richard Neutra; it's a very cool building, but maybe not so appropriate in national park. Mission 66 also launched an infatuation with road building that led to the paving of the Blue Ridge, Foothills, Natchez Trace, and Colonial parkways. Another six parkways were proposed but rejected.

Whatever the condition of national parks prior to Mission 66, afterward there was an expectation that they be more amenable, with larger visitor centers, clusters of development that resembled small towns, and more standardized employee housing. Is it a coincidence that Disneyland was in its heyday at the same time? Maybe, but under Mission 66 parks took a big step from being conservatories of beautiful places to becoming theme parks.

Director's Order #21 is another step in the wrong direction. We go to national parks to escape the workaday, to immerse ourselves in grand nature, to take a break from the relentless, throbbing beat of commercialism. Mission 66 made the parks more accessible to more people, and we can debate whether that's good thing or not, but DO21 offers no improvements of any kind. It passes the buck from public responsibility to private largesse. No, not largesse. Let's not kid ourselves-brands

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

like Coke and Nike don't do anything for the public good, they do it for profit or public relations, and the same is true here. What DO21 does is allow the Park Service, Congress, Obama, and us, too, as Americans passionate about our parks, to escape making the hard decisions that tight budgets demand.

It also puts the Park Service at major risk of conflict of interest, waters the current leader seems unable to navigate safely. In 2011, when he was the superintendent at Grand Canyon (before Uberuaga filled his vacant seat), Jarvis backed down on a ban on selling bottled water after Coke, maker of Dasani water, protested. (The ban was later enacted.) DO21 calls for superintendents now to ask private companies and entities to donate money to parks-they can ask for up to \$5 million under the new policy. It doesn't take much imagination to see the potential for back room deals and unsavory influence. Is that really what we want the heads of our parks to be doing, begging Facebook and Under Armor for money?

Under Jarvis, the Park System has already moved aggressively to pull in corporate dollars. Last year, the director killed a longstanding ban on relationships with alcohol companies and then promptly made a \$2.5 million marketing deal with Anheuser-Busch that resulted in beer bottles with the Statue of Liberty on them. "America's national parks are some of the most beautiful places on earth," said a Budweiser vice president. "We want to recognize that sense of scenery. That's why we've brought one of the most iconic, inspiring visuals in the world to beer drinkers."

Oops, sorry. Did my vomit get on your shoes?

Maybe we need a leader with a backbone that won't bend, the cajones to stand up to Congress and the charm to convince them to pony up, and the ethics to understand that "pushing the envelope" maybe isn't the best strategy for the National Park Service director. And maybe we also as a nation need to consider parks that do with less. And maybe we don't need so many national park properties-I know, heresy! Maybe we need to get back to parks with less infrastructure, with a more natural experience. Maybe, instead of caving to pressure and taking the easy dollars, the Park Service could put its efforts into educating people how less can be more, on how nature can be the salve. Isn't that what we really need in this branded content, always-connected world? What better organization to take the lead on sharing the restorative, healing properties of the great world out there than the NPS.

We can't go back to the old days, and Mission 66 is 50 years in the rear view. Teddy Roosevelt was president in a far different time than today (though the influence of money has never been tied to modernity). But still, it's worth comparing this famous quote of his to that of the beer salesman above.

"In the Grand Canyon," Roosevelt famously said, "Arizona has a natural wonder which is in kind absolutely unparalleled throughout the rest of the world. I want to ask you to keep this great wonder of nature as it now is. I hope you will not have a building of any kind, not a summer cottage, a hotel or anything else, to mar the wonderful grandeur, the sublimity, the great loneliness and beauty of the canyon. Leave it as it is. You cannot improve on it. The ages have been at work on it, and man can only mar it."

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 47

Author Information

Keep Private: No
Name: Harry
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Rockport, MA 01966
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am simply disbelieving that it would ever come to this - - my having to plead for one trustworthy refuge from product placement!

Do not do this to our National Parks - - it would be an enormous breach of trust and dereliction of duty.

If National Parks employees should be free to assist the Park Service in properly funding the parks, they should instead be lobbying Congress, and free to speak directly to the public when Congress is unresponsive.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 48

Author Information

Keep Private: No
Name: shannon
Organization:
Organization Type: I - Unaffiliated Individual
Address:
BOULDER, CO 80301
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

PLease please please for the love of what makes America truly great, please do not allow corporate sponsorships of the National Parks. The point of the parks is that the land and what they represent are greater than pop culture, human-centric ways. They are there to remind us of our connection to nature. That the natural world is the greatest gift we could ever have. I go to the parks to connect to the bigger world and leave the corporations behind. PLease for the love of God, dont do this!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 49

Author Information

Keep Private: No
Name: Kyle
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Broomfield, CO 80020
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

What an outrage this proposal represents! We don't need any additional corporate branding anywhere in society, much less in the National Park System. This nonsense goes against all that the NPS represents and should be snuffed out completely.

Such an offensive proposal would put fundraising on par with conservation and place even more political power in the hands of corporations by forcing the NPS to rely on corporate funding.

If Congress was fulfilling its responsibilities to properly fund the NPS, such folly as represented in this proposal would be completely unnecessary. Instead of essentially selling the NPS, we should quickly and effectively restore adequate public funding to the NPS.

As the 2009 GAO report made quite clear, there are several obvious risks to corporate-NPS donor relationships including: undue influence, reduction in public confidence in the NPS and commercialization of parks and the NPS. Who would want to visit any park knowing that such commercialism is waiting for them? The parks represent one of the last places in our country where we can actually detach from the incessant, offensive and mindless commercialism that infects our society.

The fact that Jon Jarvis was reprimanded over his own activities related to promoting such nonsense is telling and should be enough to alert any rational person to the complete folly of DO21.

I can say that I would severely reduce if not eliminate altogether any planned visits to the parks if this proposal is approved and implemented. What an outrage!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 50

Author Information

Keep Private: No
Name: Glenn N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Joliet, IL 60436
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

No to philanthropic partnerships!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 51

Author Information

Keep Private: No
Name: Leslie
Organization: private citizen
Organization Type: I - Unaffiliated Individual
Address:
Sherwood Forest, CA 91325
Los Angeles, CA 91325
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am appalled by the prospect of corporate advertising and commercialism intruding into the experience we have in our national parks. The parks are a refuge from the constant barrage of marketing. Corporate sponsorship would distract from the majesty of these sacred spaces. Moreover, the more dependent we become on corporate funding, the more power these commercial forces would have on how the parks operate.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 52

Author Information

Keep Private: No
Name: Rohan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
San Francisco, CA 94110
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

While I understand the benefits of improving donor relations, I'm against the increased private corporation donations for branding purposes. I understand that certain companies which to provide some philanthropic effort but if they don't want to do it without branding and donation acknowledgement on the actual things inside the park I'm against it.

Perhaps creating avenues of growth from kickstarters or similar crowd funding campaigns might produce better effects than say trying to achieve larger donations schemes from private corporations?

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 53

Author Information

Keep Private: No
Name: Christina
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Needles, CA 92363
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Accepting donations for the NPS with acknowledgements such as small plaques, small logos on park newspapers, and the use of the NPS logo on appropriate advertising has occurred for a long time, and assists with the chronic funding shortages in park operations. Such controlled and carefully selected partnerships with companies that embrace the NPS image and philosophy are appropriate.

However, selling corporate sponsorships to the highest bidder and/or partnering with companies that don't support the NPS mission is against everything the NPS stands for. NPS staff are expressing forbidden in ethics policies from actively soliciting private donations, and those regulations must continue. Corporate sponsors can be recognized, but discreetly and tastefully so. Visitors come to national parks to embrace the natural, cultural, or historical stories of those special places, not to be assaulted by the gaudy advertising that hits them in most other locations.

Gaining additional funding by destroying the very things that national parks represent is not an advantage. Selling out the NPS mission to preserve and protect to cater to corporate sponsors is not an advantage. Please stop this ill-advised plan.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 54

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Philadelphia, PA 19146
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

NO CORPORATIONS IN PARKS!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 55

Author Information

Keep Private: No
Name: Theresa
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Durango, CO 81301
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Allowing corporations and other donors to use our National Parks as an advertising platform is unethical and presents conflicts of interest. More and more people visit the Parks each year. As someone who works in the outdoor industry, I know firsthand the economic impact of outdoor recreation. Congress needs to step up to the plate and provide adequate funding to these wild places. And most importantly to keep these places wild and pristine devoid of sight pollution of corporate logos and intrusive advertising.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 56

Author Information

Keep Private: No
Name: Jessica
Organization: NPS, Golden Gate National Recreation Area
Organization Type: I - Unaffiliated Individual
Address: San Francisco, CA 94123
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Comments on behalf of Golden Gate National Recreation Area leadership:

- (1) Recommend all aspects of fundraising management be delegated consistent with the delegation of authority for acceptance of donations and approval of fundraising agreements. The draft guidance around donor vetting as well as approval of fundraising feasibility studies, donor recognition plans and construction agreements seem inconsistent with the overarching delegation of authority, requiring parks to work through the region and WASO for certain approvals and not others, and thus creating a disjointed process.
- (2) Section 3.1.3 Page # 7; 27, Line #209; 994: Suggest DO-21 simply reference the regional and national DAB thresholds, rather than stating a specific dollar amount, as these thresholds may be adjusted at some time.
- (3) Section 3.1.10 Page #10, Line #323: Appreciate the delegation to authority to Superintendents, as appropriate, up to \$5m threshold.
- (4) Section 3.1.11 Page #10, Line #336: Requirements that Superintendent submit all proposed donations over \$50k to Regional Director for vetting is too low and inconsistent with delegation of authority. Given training and certification, this vetting should be delegated consistent with donation acceptance and agreement approvals.
- (5) Section 3.1.11 Page #11, Line # 338: Requirements that all proposed donations over \$250k go to WASO for vetting is too low and inconsistent with delegation of authority. Given training and certification, this vetting should be delegated consistent with donation acceptance and agreement approvals.
- (6) Section 3.1.4 Page #7, Line #213: Suggest considering NPS employee experience and education as grounds for a waiver of the additional training certification program.

(7) Section 4.2 Page #13, Line #431: Appreciate clarification that donations may be used to fund term, temporary, and certain permanent NPS positions.

(8) Section 4.3 Page #14, Line #464: This section should specify that agreement is needed before public phase of fundraising campaign activities begin.

(9) Section 4.3 Page #14, Line #464: Recommend clarifying that if an effort is anticipated to involve only quiet fundraising, and no public campaign, then a philanthropic agreement should not be required.

(10) Section 4.6.3 Page #17, Line #581: The benefit or intent behind NPF involvement in any type of "Checkout Counter Donation Program" is unclear. Recommend that friends groups be able to orchestrate these programs with parks and without NPF involvement. The requirement that it be administered through NPF and that NPF recover administrative costs is burdensome and unnecessary in the case of partners who have a strong track record and ability to manage acceptance and administration of donated funds.

(11) Section 5.1 Page #18, Line #639: How does prohibition of accepting donations from Concessioners or those seeking contracts work in cases where an existing Philanthropic Partner has a Category III Concession Contract for convenience items or chooses to compete for a concession contract with a park? Suggest clarifying this exception.

(12) Section 5.3 Page #20, Line #700: Recommend that for phased/multi-year donations the donor only need to be evaluated in the fiscal year that the donation is offered to alleviate administrative burden.

(13) Section 5.4 Page #21, Line #737: Unclear if indirect donations to NPS through a nonprofit partner must go through full NPS donor review vetting process or if partner is authorized to undertake the vetting process consistent with the philanthropic agreement with NPS. Recommend the latter as duplicating the review process for each individual donor would be cumbersome and impractical depending upon the scale of the partner's campaign as well as unnecessary depending upon their experience.

(14) Section 5.4 Page #21, Line #740 : Helpful clarification and distinction that donations made to support administrative and operational costs are exempt from the review policies.

(15) Section 6.1 Page #21-23, Line #756-834: The distinctions between different categories of partners and the requirements for each category should be more clearly defined. Specifically: (1) The section 6.1 heading (line 756) is "Philanthropic Partners," but this same term is also used as a subcategory for one type of partner.

(2) Section 6.2 lays out categories for different levels of philanthropic agreements. It is not clear if these apply only to Philanthropic Partners (under Philanthropic Partnership Agreements) or if these also apply to Strategic Philanthropic partners.

(3) Is a "philanthropic partnership agreement" only for "philanthropic partners" or does it apply to "strategic philanthropic partners"? Likewise, is a "strategic fundraising agreement" only for "strategic philanthropic partners"?

(16) Section 6.1 Page #21, Line #768: The definition of Strategic Philanthropic Partners could be expanded to differentiate more from Friends Groups by explicitly identifying organizations that operate within parks to provide programs and services.

(17) Section 6.2 Page #22, Line #793: The details within these agreement templates are essential to the successful implementation of DO21 and NPS philanthropic partnerships. We hope that NLC and/or parks and partners will have an opportunity to comment on the templates and other components of RM-21 before it is finalized. Additionally, suggest the delegated official be empowered to decide what deviations from templates will benefit from DOI SOL review and what deviations they could approve without DOI SOL review.

(18) Section 6.2.3 Page #23, Line #829: The term of strategic fundraising agreement should not be limited to one year but rather be directly aligned with the primary partnership agreement (e.g. Cooperative Agreement) or capital campaign, if this

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

schedule is fully known. In this scenario all agreements can be executed simultaneously for partnerships that anticipate capital projects and phased investments. Requirements for Philanthropic Partners under Strategic Fundraising Agreement should also be tiered (premier and legacy categories) allowing for longer agreement terms and feasibility study waivers for partners with a strong track record.

(19) Section 6.3 Page #24, Line #882: Future ownership of intellectual property developed under partnership should be negotiated on a case-by-case basis. Requirement that intellectual property becomes property of NPS may not make sense in every instance.

(20) Section 6.5 /8.9.1 Page #26/ 33: It is not clear if there is a distinction between "Sponsorships" and "Sponsored Events"? i.e. do section 6.5 requirements for "sponsorship" refer to a longer-term relationship that requires a sponsorship agreement, and these requirements do not apply to one-time event sponsorships? Or do all of the requirements of section 6.5 also apply to sponsored events?

(21) Section 7 Page #27, Line #964: Design and construction agreement requirement should be synced with DAB threshold and not required for small projects below this threshold. This seems to be the intent in lines 995-996, but statement in lines 964-965 appears to suggest agreement is needed for any project involving a partner.

(22) Section 7 Page # 27, Line # 964: A design and construction agreement waiver or waiver of Regional Director approvals for construction agreements should be authorized for legacy partners who have (1) a strong track record of executing construction projects on behalf of NPS, and/or (2) frequently execute construction projects on behalf of NPS. Additionally, executing a separate, Director-level Design and Construction Agreement for each individual project is significantly burdensome and the recommendation is to allow for a multi-year, multi-project umbrella agreement for these types of philanthropic partnerships.

(23) Section 7 Page #27, Line # 964: This section suggests a Design and Construction Agreement will be required for any project involving a partner. In cases where partner completes A&E work on behalf of NPS, and NPS completes construction, this agreement should not be required.

(24) Section 7 Page #27, Line # 965: Include clarification that approval of Partner Design and Construction Agreements is delegated consistent with donation acceptance and agreement approvals (ie. to the Regional Director or Superintendent as applicable).

(25) Section 7 Page #27, Line #965: The terms and details of the Partner Design Construction Agreement are essential to the successful implementation of such projects and to NPS philanthropic partnerships. We hope that NLC and/or parks and partners will have an opportunity to comment on this particular template as part of the RM21 development, as GGNRA has numerous comments on the operational challenges with the existing template.

(26) Section 7 Page #27, Line # 978 : Absolute prohibition of partner management of a portion of a project funded by NPS is increasingly restrictive, and there may be instances where this is appropriate and most efficient means to accomplish a project. As long as roles and responsibilities are clearly defined and does not violate FAR, this should be allowable in certain instances.

(27) Section 7.1 Page #28, Line # 1008: In some cases, a project is not for a critical park need but rather addresses a partner's important strategic need. Recommend introducing some flexibility to this language that accounts for the partner needs, which ultimately bolster the NPS mission in some way.

(28) Section 7.1 Page # 28, Line #1018: The development of specific guidelines for a design competition seems contradictory to the spirit and inspirational intent of a competition. Specific conditions are part of the DAB review process, which a proposal will have to go through before the competition, so such issues could be discussed in that forum.

(29) Section 8.2 Page # 29, Line # 1056: The requirement for parks to develop a general, overall donor recognition plan is unclear and seems redundant, given the Superintendent responsibility identified in Section 8.3 for approving individual donor recognition plans for various projects taking place within the park. It would also inherently lack specificity for parks with robust partnerships and fundraising activities.

(30) Section 8.4 Page #30, Line #1088: Clarify that guidelines and templates for off-site donor recognition apply to donations to NPS only. While Superintendents may review overall donor recognition plan for partners, partners should have more creative latitude and there should be no requirement that partners use NPS templates.

(31) Section 8.5.1 Page #31 Line #1120: Recommend the requirement for donor recognition installation in historic structures be that it requires NHPA compliance as opposed to specifically freestanding. In this way, donor recognition would be treated the same as any other partner-installed display.

(32) Section 8.5.2 Page #32, Line #1176: Approval for naming of interior spaces should be delegated consistent with donation acceptance and agreement approvals. Assuming that the donation meets the financial requirement stated in this section, the appropriate period for interior space naming should be determined by delegated official and not explicitly limited to five years, as term could vary depending on project or the term of the primary partnership agreement (eg. Cooperative Agreement).

(33) Section 8.9.3 Page #33, Line #1228: Prohibition on distribution of free products or samples at non-NPS events should be clarified. Is distribution of free food or beverages provided by sponsor as part of an event permissible? This was the model used at Centennial Budweiser concerts and is common practice at sporting events in parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 57

Author Information

Keep Private: No
Name: James
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Carleton , MI 48117
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for taking the time to acknowledge public opinion on this matter.

I just returned from a Michigan road trip, that took me through the Huron National Forest, and camped at Tahquemonan Falls State Park for the weekend. As park administrators, I'm sure you understand what it means to reconnect with nature. Our busy city lives are already filled with a deluge of corporate sponsorship. Even our political system has been hacked by corporate financial contributions, as evidenced by 2 of the 3 remaining candidates running on campaign platforms that involve declining corporate money.

I'm all for keeping the parks open and financially secure. I suggest working on engaging donations through social media. Hire a good social media manager, and the marketing comes cheap. Show people why they should support their parks, make it relevant and interesting, and describe your funding problems. We are empathic to your situation!

Thank you,

James

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 58

Author Information

Keep Private: No
Name: josh
Organization:
Organization Type: I - Unaffiliated Individual
Address:
cupertino, CA 95014
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I do not want product placement in any national park. I do not want large commercial logos adorning anything, nor do I want people/companies to be able to name parts of the park. A small plaque near something thanking a company or person with a small logo on it is fine, as is a single billboard thanking corporate sponsors. No more. Keeping our parks pure also includes keeping them free of advertisements.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 59

Author Information

Keep Private: No
Name: Francis
Organization: AARP
Organization Type: I - Unaffiliated Individual
Address: Craftsbury Common, VT 05827
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Park leadership, in service to the public, should insist on equitable funding for this public service, not force dependence on profit-driven advertising. Yecch

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 60

Author Information

Keep Private: No
Name: Verne
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bozeman, MT 59715
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I respectfully request that you extend the comment period by 30 days. And, clarify the process you intend to implement and its implications for professional management of our national parks and monuments. Your order is glosses over what may well become selling our parks and monuments piecemeal. I am opposed to further commercialization of these treasured public resources. I support professionalism in NPS employees and it is clear that this move would divert resources to hustling money. Given so little information, you should not be surprised that I will be contacting Senator Testor asking him to intervene. Hearings should be held.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 61

Author Information

Keep Private: No
Name: Diedre
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Vallejo, CA 94591
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I'm not too sure what the heck our National Park Service is thinking allowing advertisers into the parks. I don't watch much TV nor indulge in many consumerist activities; mostly to avoid the overwhelming number of pharmaceutical/automotive/punitive commercials. National Parks are a place of solace away from the rat race, not one more place to shove advertisements. I refuse to have my pictures within the parks have unavoidable advertisements. In case your cash flow was bad enough, this could make it that much worse. I seriously doubt I'm alone in my refusal to pay to attend parks that have sponsors.

I do not like this idea and will ask my friends to also submit comments against this proposal. After what happened with the more or less hostile take over of the naming rights in Yosemite, this proposal is even scarier.

Maybe we could also help convince our legislators to quit pumping money into the war machine to instead fund our National Parks that attract visitors from all over the globe and to repair the infrastructure that gets us there.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 62

Author Information

Keep Private: No
Name: Sharon
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Newhall, CA 91321
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I'm amazed that corporate sponsorship of NATIONAL parks is even being considered. It's bad enough that bowl games, parades and sports venues have turned into one long advertisement for corn chips, car dealers, and insurance companies.

What next? The Marlboro Great Smokey Mountains, the National Association of Women Virgin Islands, the Crayola Crayon Painted Desert, or the NAACP Black Canyon of the Gunnison?

Please, please, keep national parks public and sponsorship-free. PLEASE!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 63

Author Information

Keep Private: No
Name: Tanner
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Goleta, CA 93117
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As a citizen of the United States, I am abhorred by the motion to allow corporate influence over our national parks in any sense. My dream is to visit all 59 of our National Parks in our nation. I visit our national parks to get away from our corporate nation, and to be equaled to my fellow citizens, regardless of our economic status, by the grandeur of nature. This fragile sanctuary would be shattered by the intrusion of corporate advertising and influence.

I vehemently oppose Director's Order 21 and all that it represents.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 64

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Toledo, OH 43604
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Please keep corporate logos out of our beautiful NPS.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 65

Author Information

Keep Private: No
Name: ryan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Brooklyn, NY 11211
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Please keep our public spaces free of advertising. They are spaces FOR the people and not for sale to a high bidder. Bloomberg did this to the New York parks, and now the spaces are less usable by the public. It's has transferred the usage of the space to corporate interest. There are plenty of other places for that, we come to the parks to escape from it.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 66

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Olympia, WA 98506
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

No way. The whole goal of a corporation is to make a profit and it will never be satisfied until it gains further access and control. It would be a far better plan to just keep them parks and let nature take care of the like it did for a long time.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 67

Author Information

Keep Private: No
Name: Douglas
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Phoenix, AZ 85044
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I'm an avid outdoor person, who visits many National Parks and National Monuments. So when I read about the Draft Director's Order #21: Philanthropic Partnerships, I thought why would we allow corporate donors to display their logos on and in parks. Also grant naming rights to corporations on key, highly visible park infrastructure and displays. This isn't Disneyland. Hey, I'm in the graphic design business, but the last thing I want to see when I'm in a national park is more commercialism. I'm out there to get away from all of the day-to-day onslaught of advertising something. I can't imagine walking up to trail head sign and see a Mountain Dew ad. Let's keep that kinda of stuff at sponsored venues outside of the parks. Another issue with these partnerships is many of these corporations aren't even American corporations any longer. Who's interest are they truly caring about? Their own of course.

I know our National Parks and Monuments need additional money to operate. But, when I go to some of these parks I can't see why we need to build all of these overdone visitors centers, lodging etc. How about not spending money on things that we don't need, and spend it on maintaining what we have.

Thank you,
Doug

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 68

Author Information

Keep Private: No
Name: Brian
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98133
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am absolutely against corporatizing our National Parks. By allowing logos of these institutions you are tacitly agreeing these entities own these places that are supposed to belong us all. The only logos that should be in National Parks are those belonging to our national agencies. I am shocked and appalled this is even being considered.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 69

Author Information

Keep Private: No
Name: James
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Jackson, WY 83001
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I oppose this initiative. Congress should provide adequate funding for our national parks.

Please keep advertising out of our public lands, recreation areas and public facilities. The move toward corporate sponsorships has been disheartening.

"Philanthropic partnerships," while sounding promising, opens the door to more commercialization of our public lands.

Just no.

Thanks,
Jim
Jackson, WY

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 70

Author Information

Keep Private: No
Name: Carolyn
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Shelton, WA 98584
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Teddy Roosevelt is spinning in his grave right now. And so is Muir and the others who, against great adversity, started the NPS. This is outrageous!! Those of us who have paid for the parks for our entire lives are outraged that this is even proposed. What's next? When a fireman rescues me from a burning house is he going to be required to say: This rescue brought to you by Preparation H? No, no, no, no. A thousand times no! The CITIZENS of America bought and paid for our National Parks. They are sacred treasures and NO corporate names should be allowed.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 71

Author Information

Keep Private: No
Name: Stephen
Organization:
Organization Type: I - Unaffiliated Individual
Address:

Seattle, WA 98107
USA

E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

The parks are for everyone! Please remember this.

Attempting to solve short-term funding problems by selling logo space to the highest bidder diminishes what makes the parks great. The National Parks are a truly unique spaces in American life. Our country already has enough theme parks, Wal-Marts and shopping malls. The NPS should not stoop to that level of crass consumerism. Our parks should continue to be a sanctuary from the crude greed of everyday life.

Republicans have refused to give the NPS the funding it desperately needs, but the park service jumping in bed with corporations furthers the radical right agenda of selling of NPS, DNR, National Forest land to the highest bidder.

I urge the NPS to stand firm AGAINST this sort of corporate intrusion into public spaces.

Thank You,

- Stephen

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 72

Author Information

Keep Private: No
Name: John
Organization: I am just a concerned citizen.
Organization Type: I - Unaffiliated Individual
Address:
San Rafael, CA 94901
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

We are currently bombarded with advertising nearly every minute of our waking hours. The National Park/nature is but a brief respite for the majority of us. Please do not accept corporate funds to support the parks. It would be one of the most disappointing things I could think during a visit to see a corporate name/logo/identifier.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 73

Author Information

Keep Private: No
Name: Diane
Organization: Ms.
Organization Type: I - Unaffiliated Individual
Address:
Monroe, WI 53566
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I think that this is absolutely a terrible idea as it uses the names of highly regarded National Parks in any advertisement. This will detract from the greatness and wonder of these National Parks and make them part of cheap advertisement. There must be a better way to earn money for the National Parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 74

Author Information

Keep Private: No
Name: Adrienne
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Alexandria, VA 22307
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am absolutely against this change. Is nothing sacred anymore? Must everything be sold to the highest bidder? This is disgraceful. No, I do not want to see corporate logos on the doors, benches, trucks or anywhere in our national parks. This is the very reason Tesdy Roosevelt started the National Park system- -to save these majestic places from corporate greed. He is surely rolling over in his grave. And I don't care if it's done "tastefully" or is in certain areas only. Once you open the door, it is a slippery slope. Companies should donate to these parks and take the write-off with no public, permanent recognition that disgraces and defaces our national parks. Never. Ever. should this even be a consideration. We go to OUR national parks to get away from the onslaught of media and advertising. Especially for our kids! You are missing the point of these parks if you put this policy in effect and should be fired for not doing your jobs, which is to protect the serenity of our national treasures. Find another way to raise money.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 75

Author Information

Keep Private: No
Name: Kenneth
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Davidsonville, MD 21035
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

The goals of National Parks Service, its parks and its employees should not be put at risk by exposing them and their funding to a dependence on commercialism.

The administration of our national parks should be for citizen benefit, and should not have to worry about what specific corporations think about plans for and on-going projects in our national parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 76

Author Information

Keep Private: No
Name: Nicholas
Organization:
Organization Type: I - Unaffiliated Individual
Address:

Golden, CO 80401
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not this. It would be a disaster for our national parks and what they were truly meant for. I don't see how someone who works for the NPS would not be scared to death about the potential conflicts of interest and the slippery slope that lies ahead. Please, throw this idea in the trash where it belongs.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 77

Author Information

Keep Private: No
Name: BILL
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Austin, TX 78736-3021
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I find it incredible that the park service is thinking about opening up our most important national heritage to be used as private advertising gimmicks. To think of our iconic, world-famous destinations being branded by the highest bidder makes me sick to my stomach. The fiasco with Coca-Cola being able to stop parks from banning the sale of bottled water- -a pollution nightmare and health hazard compared to simply having publicly available water fountains and spigots- -should be enough to tell you that commercialized contributions come at the expense of park operations.

Instead, you're doubling down on letting commercialism run rampant and tying park budgets to corporate contributions. Even worse, your putting fund-raising on par with staff conservation efforts.

Our national parks weren't created for the park service or anyone else to make money. They were created for the enrichment and enjoyment of the American people and were designed to benefit future generations as much as the current one. Selling off the space, the names, and the images completely corrupts that purpose and opens up park policy to be exploited and controlled by the biggest donors. Even in an election year, even one that sees Donald Trump debasing American politics to the level of a reality show, this might be the most shameful display of short-sighted pandering I've seen in public policy.

I can understand that park budgets are dwindling and in order to keep them up you have to find increased sources of funding, but there has to be another way.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 78

Author Information

Keep Private: No
Name: Ruth
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Porterville, CA 93257
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

How can you even consider such a proposal after the debacle with Delaware North and Yosemite "naming rights"?! Once approved, the "tiny name plaques" will become larger and then have logos and then advertisements. YES the parks need donations. Why can't you appeal to the civic pride of corporations? People and corporations CAN give money without being recognized for it. I do!!!! Corporations can deduct such donations from their taxes. They do NOT need "recognition " (read, advertisements).

Yes, I've seen name plaques on seats in theaters and they are not obtrusive. And NO, I don't think they would suffice to make a big corporate donor happy. People who give fore the recognition want RECOGNITION.

Hire someone to appeal to the civic pride of the citizens of our country and the corporations and the congress. After all, it is congress who designated National Parks. They need to approve maintaining them!

Please, please do NOT start this "nose of the camel under the tent" process. It will ruin the parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 79

Author Information

Keep Private: No
Name: wally
Organization: george mason university
Organization Type: I - Unaffiliated Individual
Address:
hamilton, VA 20158
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Our forebears conveyed to us an amazing collection of national park treasures...and today they're about the last place on the continent that you can visit and get away from the non-stop commercialization of America. Are we going to say to future generations, "sorry, we couldn't come up with the money necessary to keep these spaces pristine for you."

C'mon NPS. Show some backbone. CLose parks on a rolling basis if that's what it takes to wake America up to the need to fund these national treasures. Don't try to keep it off the front page by selling everything out to corporate interests.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 80

Author Information

Keep Private: No
Name: Dan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Rosamond, CA 93560-6804
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I object to this order. Corporate donations to our national parks should be strictly voluntary, without direct solicitation by the NPS. Also, corporations should have no naming right and no say in how you run our parks. For example, Coca Cola's pressuring you to not ban their products is obscene.

Thank you for the opportunity to comment.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 81

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98122
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

No Advertisements No advertisements even when camouflaged by the term philanthropy. Doublespeak at its worst.
No advertisements. No advertisements even when threatened by the scare tactics of cutbacks in jobs and public bathrooms.
No advertisements. No advertisements even for sales of plants or conservation group memberships.
No advertisements. No advertisements even in the parking lots of our parks.
No advertisements. No advertisements even on the web pages of our parks.
No advertisements. If commercial entities want our attention they can put support of our natural sites and on our wildlife on their own product like Dawn detergent has done for years. And yes, I buy Dawn.
No advertisements in our parks! None Nada Never
This is an incredibly short-sighted, ugly scar on our often only respite from crass commercialization that matches the "no harm done" myths of tobacco and lung cancer, or strip mining and water purity, or cattle grazing on public land and other wildlife needs, or dams and blocking salmon migration.
No advertisements.
No advertisements.
No advertisements.
Don't be suckered into selling out our public birthright. No advertisements.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 82

Author Information

Keep Private: No
Name: Christopher
Organization:
Organization Type: I - Unaffiliated Individual
Address:
San Francisco, CA 94117
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Hi, as a Californian of more than 10 years, I'm a frequent user of national parks.

I read recently that many comments to governmental institutions are lumped together and dismissed because they're largely opinion-based and thus, in the eyes of some, can't compete with the substantive, multi-paragraph analyses submitted by large corporations with substantial funding.

While I'm dismayed by this claim, I think the proposed rules on Philanthropic Partnerships in the national park system are a perfect example of why the voice of everyday citizens should be heard equally as loudly as that of the most powerful corporations.

That's because this is an issue that extends outside of the reach of the aforementioned multi-paragraph analyses. If you're debating whether the NPS should open itself to more partnerships with large, multinational brands, and you're already privileging these sophisticated analyses, then you're unfairly siding with the brands a priori.

More simply, and despite protests to the contrary, this is not a quantitative decision. It's a qualitative decision about nature, preservation, and the wholesomeness of American public life. For the entirety of its existence, the national park system has been a natural refuge and an educational example of what the real world is like, absent the pervasiveness of corporate advertising in urban and suburban environments. I am 100% opposed to the appearance of corporate logos and other branded elements on park service property, and I'm similarly opposed to letting donors build and operate service buildings within the park, and the other rules proposed.

Allowing the park system to be penetrated by these branding symbols and the corporations that they represent will significantly damage another brand - - that of the park service itself, and the country that runs it. Please retract these rules. We'll find another way.

Thank you,
Christopher

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 83

Author Information

Keep Private: No
Name: J B
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Boulder, CO 80304
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Keep corporate interest and advertising out of the NPS and keep NPS staff focused on their jobs and the interests of US citizens, not fundraising and wooing donors.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 84

Author Information

Keep Private: No
Name: Blake
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kingsburg, CA 93631
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I'm OK with private sponsors I would however, like to make sure the State and feds continue to put up the same amount of \$\$\$ they do today!!! Wouldn't want them to look at this as an opportunity to take funds and foolishly spend elsewhere!!!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 85

Author Information

Keep Private: No
Name: John
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Pocatello, ID 83201
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Jon Jarvis, Director
National Park Service
1849 C Street NW
Washington, DC 20240

Mr Jarvis,
I have read the Draft Director's Order #21: Philanthropic Partnerships and am quite alarmed by what is being proposed.

Allowing corporate donors is a slippery slope that opens a Pandora's Box of issues and I do not feel that the NPS has properly addressed the myriad of issues this could raise.

Relying on corporate donors to fund the NPS budget will inevitably lead to those donors exerting more and more influence over how our parks are managed. That will lead us in the wrong direction.

Placing the burden of fundraising on so many NPS staff members will have consequences as well. We need them to be focused on their park jobs and not burden them with this added role which leads to less actual park management being done while staff is out hobnobbing with corporate hacks.

Our national parks are sacred and I do not want them to become tarnished with corporate logos all over the place. I don't want to see "Old Faithful, brought to you by the Koch Brothers", or "The Yosemite Trump Parkway", or "Subaru, the official car of the NPS" plastered on every park vehicle I see. We go to the parks to get away from that.

If the issue driving this is lack of funding from our do-nothing Congress, well, call them on it. Use your resources to raise awareness of the problem. Don't sell out to corporate America.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 86

Author Information

Keep Private: No
Name: Michael
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fairbanks, AK 99708
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/10/2016 Date Received: 05/10/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

To: Director of National Parks

I strongly disagree with plans to allow corporate sponsors to display their logos in national parks in exchange for "philanthropic" donations - - this is nothing but barely disguised advertising for the commercial sector. The parks are part of rapidly diminishing public spaces in which people can escape the incessant onslaught of consumer bullying. More commercial intrusion (in addition to privatized catering, which already exists in many parks) is against the spirit in which parks were founded and distract from their timeless, wild quality. John Muir and Theodore Roosevelt will be stirring in their graves.

I have worked as a wilderness guide in various parks - - for the past 25 years - - from Canyonlands to the Big Bend, Grand Canyon, and Gates of the Arctic and can tell you that not just I, but most of the clients I guide would be extremely distraught at this intrusion, even though it might be confined to the visitor centers and similar infrastructure. I think Congress needs to be pressured to allocate more funding, especially for less popular parks; or else, existing infrastructure, especially such as runs counter to the mandate to preserve parklands for future generations - - parking lots, access roads, hotels, etc. - - should be downsized. Not every place inside a park needs to be wheelchair or car-accessible. Also, some of the bureaucratic overhead could be eliminated. (Permits, for example are still issued in person rather than online in the Grand Canyon.)

These lands are America's greatest gift to itself (and to the world). Please don't compromise the idea, or the reality.

Regards,
M. E.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 87

Author Information

Keep Private: No
Name: Sandra
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kelso, WA 98626
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/10/2016	Date Received: 05/10/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Fundraising for the National Parks is one thing, but allowing corporations to "buy in", place their names all over the parks, having very much of an influence over park policies etc is NOT a good idea at all. Raising funds similarly to ,say, the way public radio or TV does or social/cultural groups such as girl/boy scouts, environmental groups, Salvation Army etc etc would be appropriate. Keep big business out of our park system unless they want to donate then slip quietly away. Thank you!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 88

Author Information

Keep Private: No
Name: Myra
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Oneida, TN 37841
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Philanthropic partnerships within the National Park Service is one of the most heinous, hair-brained and unconscionable ideas I have ever heard about within the NPS. As a former employee, I find this thought appalling and sickening. Although I was an NPS employee to one unit for 16 years, I was also considered a local. So some of the things that irked me the most that that unit often did was renaming roads and trails from local names to new names, often thus showing local NPS management how little they knew about the topography and/or area. And the NPS at that site also often disliked naming a road or trail after a known settler. So to make this thought even more revolting is our NPS considering selling its soul to high-dollar corporations. How low can the NPS sink?

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 89

Author Information

Keep Private: No
Name: Myra
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Oneida, TN 37841
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Although I recently submitted comments, I would like to add to what I previously said.

The more I think about the way this philanthropic "partnership" idea could run, it makes me angrier and angrier. To think that our National Parks could emblazon individual's names or the names of Corporations instead of the names of those who have put their sweat and blood into a site just sickens me! For years the children of individuals who helped construct the Leatherwood Ford Low Water Bridge at Big South Fork NRRA tried to get their father's name or names inscribed at the site, but no - the NPS cannot do such a thing! But they can pander with alcoholic beverage companies, sleazy corporations, or other entities who wish to tarnish sacred areas with their product's names! Again, the NPS has sunk to a new low with this idea.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 90

Author Information

Keep Private: No
Name: Christopher
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Alta Loma , CA 91701
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not jeopardies the integrity of our public lands by opening them to private interests. Our National Parks deserve to be treated in accordance with their original intent in mind; the preservation and protection of lands from private interest for the enjoyment of the public.

Thank you,

Christopher

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 91

Author Information

Keep Private: No
Name: Gene
Organization: The Arlington House Foundation
Organization Type: I - Unaffiliated Individual
Address:
McLean, VA 22103
McLean, VA 22103
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Comments from the Arlington House Foundation Regarding
Draft Director's Order - #21

1. BACKGROUND:

The Arlington House Foundation would like to acknowledge the recommendations compiled from the 2014 National Park System Advisory Board report "Toward a New Era of Philanthropy and Partnerships and the contributions of our partners who served on the National Park System Advisory Board's Philanthropy and Partnerships Committee that authored the draft Director's Order-#21. As the primary audience is NPS staff, we did, however, find the tone of the draft document to be more inclusive for park volunteer partners like ourselves. Our remarks regarding the draft document are meant to be helpful and we hope serve to clarify additional guidance that we feel is necessary to improve the philanthropic relationships between the Park Service and its' volunteer partners.

As a more generic remark prior to discussing specific sections within the draft document, we would like to propose a more detailed look at the document as a whole and the appearance that it may be written as a "one size fits all" as it pertains to all volunteer partners and their capability to raise funds for the Park Service. Our volunteer partners are not structured in the same way and in terms of size are very different and more importantly many are extremely adroit within the area of development (fund raising), while others do not raise funds at all for the park service. We would hope that the Park Service would take these comments into consideration when making additional changes to the document prior to formal publishing. Additionally, we would like to remind the park service that several volunteer partners such as the Arlington House Foundation have very detailed agreements with the Park Service that have been structured with the assistance of an attorney and the Park Service attorneys thereby creating a professional document that contains the majority of detailed philanthropic items found in the draft DO-#21.

2. Arlington House Foundation Comments for Draft DO-#21:

A. 210-3.1.4: Philanthropic Competencies and Skills: While it is certainly understandable that Park Service personnel will have to have specific training within the fund raising arena, there should be careful consideration given to assessing which volunteer partners have little to no fund raising experience and those volunteer partners that have extensive development/fund raising experience due to years in the field and their professional job training. These knowledge levels should encourage thoughtful consideration regarding more than one level of development training and assigning knowledge levels to each volunteer partner. The Park Service should view long term their wants and needs in the area of philanthropy and the fact that this will certainly involve a more sophisticated level of training. This would benefit the Park Service staff and all volunteer partners.

B. 348-3.1.12: NPS Partnership Council: We would encourage the Park Service to seriously consider adding an additional non-voting/rotating liaison to the NPS Partnership Council from the Presidents of their local volunteer partners.

C. 371/382-3.2: Philanthropic Partners: We would encourage the Park Service to work with their smaller, less robust volunteer partners to ensure that they have strong agreements with the Park Service and consistent/yearly work plans.

D. 779/796-6.2: Philanthropic Agreements: The Arlington House Foundation partnership agreement is considered a supporting partner agreement according to the draft DO-#21. We would like to point out that the draft contains no instructions for renewing any said agreement.

E. 622-5: Donor Review: This particular paragraph does not give the Park Service nor its volunteer partners specifics as to whether a Park Service donation (direct donation to the Park Service) or a volunteer partnership donation is to be completely vetted regardless of the size of the donation. Our foundation fund raising efforts on behalf of the Park Service are all fund raising efforts on Park Service property which are vetted with the Park Service prior to any function taking place on Arlington House property. So this process already takes place if the Park Service and their volunteer partners are working in partnership to hold an event on Park Service property. We urge the Park Service to reconsider the phraseology of the donor vetting process as it relates to the Park Service and their volunteer partners hosting an event on park property.

F. 565-4.6.2: Donation Boxes: We would like to commend the Park Service for their decision to allow their philanthropic partners the ability to place a donation box within a park location. Our foundation has placed an \$8000.00 (donated) replica of Arlington House within the mansion and we have consistently raised substantial funds to be used for Arlington House projects. We would encourage other philanthropic partners to do the same.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 92

Author Information

Keep Private: No
Name: James
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Plymouth, NH 03264
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The dependence on private and corporate funding by the NPS is becoming a more acceptable and normalized practiced. It has allowed NPS Officials to use funding to cover shortfalls in operational and maintenance budgets, in some cases to the detriment of the long term sustainability of given NPS units. It is clear that the NPS can no longer adequately manage the areas under its jurisdiction without alternative funding sources. With decreasing Congressional support the NPS looks elsewhere and this will come back to haunt the agency. The reliance on private and corporate donations will lead to the corruption of the values for which the Parks were established and enable donors to favored over the general public. National Parks should be held to the highest standards for public lands. Sections 5.2 EVALUATION FACTORS should be beefed up with stronger language, including potential consequences of failure to adhere to the policy, in order to maintain the integrity, impartiality, and public confidence in the NPS.

In my opinion, Superintendents should manage Parks not donors. Keep the authorized employees at the Regional of Washington Office levels or at least only allow executive service level employees this authority! It is a slippery slope the NPS is travelling down and the heavier reliance on non-appropriated moneys will only embolden Congress to divest in America's Best Idea!

Thank you for the opportunity to comment.

J. Dan

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 93

Author Information

Keep Private: No
Name: Mary
Organization: Natchez Trace Parkway
Organization Type: I - Unaffiliated Individual
Address: Tupleo, MS 38804
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
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Number of Signatures: 1 Form Letter: No
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Notes:

Correspondence Text

Page 7, line 213, section header "3.1.4 Philanthropic Competencies and Skills"

- Formal training and certification should be required for NPS managers overseeing these programs.

Page 8, line number 215, section header "3.1.4 Philanthropic Competencies and Skills"

- This reading implies that the training and certification program required by NPS staff will be available but not required for key partner staff. The suggestion is that policy writers consider requiring key partner staff to take the same training, perhaps at a certain donation threshold to be determined.

Page 10, line number 333, section header "3.1.11 Superintendents"

- Examples of an annual work plan should be provided during the training and certification program. An annual work plan could be an effective guide for parks and partners, allowing for both structure and flexibility.

Page 11, line number 343, section header "3.1.11 Superintendents"

- Suggest that Superintendents maintain a list of partners that have achieved certification through accredited training.

Page 12, line 382, section header "3.2 Philanthropic Partners"

- Policywriters might consider if partners should be required to achieve certification in the NPS training for philanthropic competency at a certain donation threshold.

Page 16, line 563, section header "4.6.2 Donation Boxes"

- Clarification might be needed here for what, if any, requirements there are or should be to notify the public of the formula agreed upon by parks and partners.

Page 16, line 569, section header "4.6.2 Donation Boxes"

- Donation boxes should not only clearly inform the public on how the partners would use the funds but the box itself should be very clearly labeled as a box managed by the NPS or managed by a partner. Visitors should have the opportunity to clearly understand if they are donating to the NPS or to a partner. This policy may also consider requiring that formal philanthropic agreements with partners who are permitted this option are publically available, either on-site or on the park's website or both.

Page 17, line 591, section header "4.7 Electronic Donations and Emerging Practices"

- Expanded donation opportunities through electronic means are important to donor flexibility.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Page 19, line 660, section header "5.2.1 Integrity"

- Policywriters might consider emphasizing the importance of transparency in this section. Parks should be prepared to provide, upon request, information and justification regarding their donation decisions.

Page 31, line 1126, section header "8.5.2 Suggestions for In-Park Recognition"

- Suggest that approved examples in each category be provided as part of the training and certification program for parks. Printed examples might also be created by WASO for easy distribution to parks and park partners, even if those partners are not required to take the NPS training. This section addresses what is likely to become the visible part of this policy - what recognition actually looks like to the public while they are in the parks. Covered here is the intersection between two variables - individual park decisions and a wide variety of possibilities. Further clarification is needed at some point in the process.

Page 32, line 1160, section header "8.5.2 Suggestions for In-Park Recognition"

- Clarification is needed to explain why benches must be confined to a visitor center or similar high-traffic area. Are parks with suitable but more remote settings prohibited from placing benches in such settings?

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 94

Author Information

Keep Private: No
Name: Laura
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Alton, IL 62002
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I think this is well thought out. Two things that would also benefit the NPS and partners/donators

1 Ensure that all donations meet the enabling legislation and collections management plan of the receiving park, based on the GMP goals and future plans. IE: a civil war battlefield probably shouldn't accept a WW2 bomber to put out for display on the battlefield. On the same token a presidential home that saw no active battle engagement should not be displaying cannon artillery. It isn't part of the park's mission.

2 All parties shall provide clear and transparent reports of funds uses including planning and management. This provides not only for the NPS desire to be above board in the management of public assets, but keeps the partners clear and cognizant of their relationship with the public asset. The partnership may be mutually benefiting, but should also be clear as to what those benefits current and future shall encompass when addressing public assets.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 95

Author Information

Keep Private: No
Name: Barbara
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Denver, CO 80220
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am sorry, but this is a really bad idea. Give them an inch, and they will take a mile. Perhaps you should be fighting for more funding instead of inviting corporate sponsorship. I don't care if it is temporary or what it is, our national parks are not the place for this sort of thing. Some of us remember when Coke fought the ban on bottled water.

Trust me, corporate America will take advantage of this, no matter what they say.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 96

Author Information

Keep Private: No
Name: Joan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Ocean Township, NJ 07712
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is appalling. I know the parks need money but can we please have something which is not sold to the highest bidder? All our sports stadiums are nothing but corporate advertising. Please don't do this.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 97

Author Information

Keep Private: No
Name: John
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Washington, DC 20015
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Having worked for many years in Congress on park creation, management and funding, I am supportive of the general design of DO #21 as a reasonable mechanism for supplementing public funds to support units of the NPS system.

However, I very strongly encourage a modification of the draft order with respect to the duration of naming rights for spaces within a visitor's center under certain circumstances. Having been involved in the dispute surrounding the public-private aspects of funding for the Presidio Park, I understand both the controversial nature of the subject as well as the need for reasonable restrictions to ensure against over-commercialization of public lands.

As a member of the board of the Hamilton Partnership - the official friends group for the Paterson Great Falls National Historical Park (Paterson NJ), I recommend discretion be granted the Director or Regional Director concerning the period for which naming rights may be granted. In a park such as Paterson, the opportunities for attracting substantial private funding are limited, and given continuing limitations on congressional appropriations, development of the park will be heavily dependent on securing such funds in a highly competitive environment. The few entities that can make significant donations require lengthier periods of time, and if denied them, can easily secure such conditions in a number of alternative venues including medical facilities, museums and other public facilities. Limiting naming rights in these circumstances virtually ensures that donors will decline to support the park unit in favor of more appealing opportunities. While private entities will clamor for the ability to associate their company or foundation with iconic destinations like Yosemite, Yellowstone or the Great Smokey Mountains, the case of new parks in low income areas struggling to gain a foothold and build public engagement is a very different, and more challenging, matter.

In a situation like Paterson, where the financial capabilities of the surrounding community are extremely limited and the number of prospective high-end donors are few, a restriction of 5 years simply means these parks will be unable to benefit from the intended goal of DO #21: attracting private funds to build and maintain a park's resources. I recommend, therefore, that authority to grant a waiver from the 5 year limit be vested in a finding by the Director or Regional Director that a limited number of circumstances warrant a longer period of up to 75 years. Such criteria could include the economic conditions of

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

the park in question, the need to construct or substantially modify essential facilities such as a Visitors' Center, and the limited availability of large scale donors available to support the park's development and maintenance.

I am confident that a serious of defensible criteria can be developed by the NPS to minimize any possible exploitation of such waiver authority but which will provide parks in need, like Paterson, with access to the limited funding opportunities that do exist.

John
Member of the Board, Hamilton Partnership for Paterson
Democratic Staff Director, Committee on Natural Resources,
U.S. House of Representatives 1993-2000

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 98

Author Information

Keep Private: No
Name: Laurie
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Coarsegold, CA 93614
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/11/2016	Date Received: 05/11/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

No. Just no to any advertising, money from private industry, etc. Money given always has an expectation that follows the "gift".

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 99

Author Information

Keep Private: No
Name: chris
Organization: national park service
Organization Type: I - Unaffiliated Individual
Address:

atlanta, GA 30303
USA

E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/11/2016	Date Received: 05/11/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

General Comments

" Naming this Directors Order Philanthropic Partnerships places a focus on only one aspect of what partners can assist the NPS with - money. For many of our partners, that it is a minimal part of what they bring to the table. The overall impression after reading the DO is that the NPS is only interested in money from our partners.

" The DO has very little detail in numerous areas and directs the reader to the Reference Manual for more info. Unluckily, in several of these cases, there isnt enough info to fully understand guidance for the new DO. (ex: 3.1.1. - NPS employees expressing support for authorized fundraising campaigns). The devil is in the details and there are numerous details that are presently unknown.

" We shouldnt lump friends groups in with other one-time partners nor partners that only bring funds to the NPS. We have a unique relationship with friends groups that we dont with other philanthropic partners. NPS friends groups provide so much more than funds and are invaluable in helping NPS be successful. I am not comfortable with the focus on philanthropy (in exclusion of the other benefits) and changing the moniker friends group to philanthropic partner plays into this misunderstanding. There should be a section within this DO focused on friends group relationships and there should continue to an agreement specifically for our relationship with these organizations. Replacing the Friends Group Agreement with the Philanthropic Support Agreement leaves out the numerous activities that benefit the NPS from our relationship with these groups. Since there is no draft agreement to review, I would suspect that the new Philanthropic Support Agreement will not include expectations of how the park and the friends group will collaborate long-term (beyond the philanthropic aspects).

Specific Comments:

" Section 1.1

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

o We should re-write the entire third paragraph under section 1.1. DO 21 should not be about regulating fundraising activities, but about collaborating with partners to help fulfill park needs.

" Section 3.1.2

o The DO references that the Director and both Deputy Directors can solicit donations. I can understand the Director and political Deputy being able to solicit but what authority do we use to allow the non-political Deputy to solicit and if there is no need for an authority, then why isn't this ability also granted to the Associate Director for Partnerships and possibly members of the Partnerships Office? I would feel more comfortable if only our political appointees were involved in actually asking for funds.

" Section 3.1.3

o Must everyone who accepts donations and/or authorizes fundraising have this certification? If so, there should be a minimal level of authority allowed without the fundraising certification. Possibly go with the existing maximum thresholds which allows anyone to presently accept and/or authorize such donations/fundraising without any certification.

" Section 3.1.4

o Authorized employees must undergo a certification training. What I originally heard was that that would include 40 hours of classroom time and 40 hours of on-line training. This is way too much to expect of most Superintendents and all Regional Directors and their Directorates and others that we want to better understand philanthropy. Besides Superintendents, we really want Chiefs of Interpretation to understand this role since they are likely the ones who work the closest with philanthropic partners in larger parks. The course should be no more than a couple of days and if there is an on-line only option, there are likely to be more NPS staff who will take it. For future NPS leaders the certification process can be built into Superintendent training programs.

o The other item that needs to be included in this DO is what happens if the Superintendent does not take the training. What donation threshold are they allowed to accept and what fundraising authorization are they allowed to provide? There needs to be some threshold of authorities for those who don't take this training - at least for the period until they receive the training.

o The other concern is what is expected of partners. The DO says that this will be available to partners but it doesn't say whether it is required or just optional. I believe that it should not be required.

o There is no mention of anyone being grandfathered into this system based on previous successful philanthropic partnerships. I believe that we should provide this status to numerous Superintendents, Regional Directors and partners based on previous successes.

" Section 3.1.7

o Coordinate partnerships that are national in scope, or involve parks and programs in more than one region - does this mean that partnerships that are now managed by other NPS programs (ex: RTCA, Healthy Parks Healthy People, Long Distance Trails, etc.) are managed by the Division Chief or only philanthropic partnerships that meet these criteria? I believe that this office should only manage a subset of partnerships that the NPS undertakes but should track the entire portfolio of NPS partnerships.

o There are absolutely some national partnerships that should be managed by the Division Chief, but more importantly, there needs to be a clearinghouse that captures all the partnerships (philanthropic and otherwise) that are on-going within the NPS. This office could serve as that clearinghouse.

" Section 3.1.9

o The Comptrollers Office should also be represented on the NPS Partnership Council

" Section 3.1.10

o This section doesn't mention Regional Directors having to participate in the certification training. I don't believe that they should have to, but thought that I'd heard that they would also have to undertake this training. The DO should be clear to say that they do not have to take any certification training.

" Section 3.1.11

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

- o This section says that the annual work plan should guide the philanthropic goals and objectives. I believe that the annual work plan should do more than just address philanthropic goals; it should also identify other collaborative efforts that the park and the partner will undertake together that year. This should be clear within the DO.
- o The last bullet references the Superintendent coordinating all philanthropic partnerships. Do we expect the Superintendent to play this role even at our largest parks? It might make more sense to use the term support philanthropic efforts vs. coordinate philanthropic efforts.

" Section 3.1.12

- o The Partnership Council needs to be about much more than philanthropic partnerships. The NPS does so much more.
- o Non-philanthropic NPS partnership program staff need to be represented on the NPS Partnership Council so that the council can truly help advise on how to address partnership issues.
- o 12 members may be too small a group to include all of the entities that need to be included.

" Section 3.2

- o Only a very small portion of our existing friends groups raise substantive funding for our parks. I don't think we should expect most of them to participate in the certification program - especially if that program remains at 40 hours of in-person training and 40 hours of on-line training. You would have more takers if you reduced that to no more than 16 hours of on-line training. I don't believe that most of these groups will be able to undertake substantive fundraising, so there should be minimal donation acceptance and fundraising levels that we should allow all of such groups to undertake without this training. I suggest that we use the levels now established to cover the majority of our friends groups so that they do not have to undertake the training. If they decide that they will raise more and/or would like greater latitude, they could then undertake the training.
- o For nonprofits, who would we expect to take the certification training? The executive director? The board chair? Most of our friends groups do not have staff so it would have to be the board chair - who is a volunteer. Even a short certification process would be an onerous expectation on our part.

" Section 4.3

- o Under c), the DO says that regional partnership coordinators must provide all agreements that authorize \$1 million or above campaigns to the Division Chief. I thought that Regional Directors could be delegated authority for up to \$5 million. Under this scenario, would regions still need to provide this info to WASO for authorization?

" Section 4.4

- o This section needs more details around the benefits of corporate partnerships and general expectations with them prior to going into much greater detail in each of the subsections of Section 4.4.

" Section 4.6.1

- o Since partners will be allowed to raise funds within parks, does this mean that there is no prohibition related to a partner accepting funds on park property? Can philanthropic partners take payment for races/etc., items purchased at an auction, paintings purchased at park events within the park now?
- o Must 100% of all donations collected by a park partner within a park go toward a park initiative, asset or program? This type of event is critical toward organizational sustainability and one of the best ways for our friends groups to raise funds for their organizational needs. If we don't allow them to raise funds for their own needs within the park, they will have a harder time becoming a sustainable organization.

" Section 4.6.2

- o Does benefit the NPS include the philanthropic partner using some of the funds from a donation box to cover organizational expenses? Managing donation boxes is a time-intensive and costly responsibility for parks. We should encourage parks to have their friends group undertake this responsibility and we should allow them to retain some of those funds for their own organizational needs and to cover the costs of managing the donation box(es).

" Section 5.1

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

o NPS is to decline direct donations from tobacco companies, but in the powerpoint presentation located with this DO on PEPC, there is reference also to drone companies. Does that need to be included here?

" Section 5.4

o Does this mean that philanthropic partners cant accept donations from tobacco companies or drone companies? If so, that needs to be clearly delineated within this section.

" Section 6.2

o In the 4th paragraph, the DO references that the agreement with the NPS will authorize annual or membership campaigns of the organization. I dont think our nonprofit partners will like the idea of having to obtain our approval to undertake these activities. These are the decisions of the boards of these organizations. If we are trying to say that the NPS needs to authorize these activities on NPS land, then we need to say that explicitly.

o I dont like these categories of partners; I dont think that this will be very attractive to our friends groups. I believe setting the basic period of agreements at 5 years is fine and then allowing Superintendents to decide whether to allow long-term, successful partners to go to 10 or 20 years. I like the ability to obtain a waiver for fundraising feasibility studies, but think we should use our existing guidance related to that and yes, we should allow that decision to be made at the lowest level (based on the size of the fundraising campaign).

" Section 6.2.4

o What expectations are there for how many corporate logos or signs or sizes of the logo are there? I assume that guidance will be provided in the RM, but some basic info would be helpful in the DO.

" Section 6.3

o I dont believe that the NPS should own all developed intellectual property. I believe that the NPS and the partner should negotiate on each item of IP as to who maintains ownership both during the relationship and after.

o We need to include a better definition of intellectual property and identify examples of what falls into this category. We should also be clear about what is not considered intellectual property.

" Section 6.4

o I believe that it is a mistake to only allow partners to use the new NPS marks and not the Arrowhead. I believe that we need to be very cautious of how the Arrowhead is used but I believe that we should allow our friends groups to use the Arrowhead as long as they are under an agreement with us.

" Section 7

o Change wording in the first paragraph. A partner would not need to have a Design and Construction Agreement in place if they only want to raise funds for the project. Since there is mention of the partner possibly operating the facility, it might be worthwhile to include mention of an Operating Agreement.

o There should be at least 4 ways a partner can participate in constructing NPS facilities. Need to add - a partner could fund the project at 100% a only manage the design or the construction portions of the project.

o What about a partner donating or working with others to have design and/or construction donated? We need some clear guidance on that model.

o Since Partner Design and Construction Agreements are only needed for projects with a net costs of \$100,000 and greater, what instrument do you use (or do you need an instrument) when the partner is undertaking the design and/or construction on projects less than \$100,000? It would help to be clear here. Could we say that you use a Special Use Permit?

" Section 8.7

o Who authorizes use of logos/name script/credit lines (Superintendent or higher)?

Items Need to Address in DO 21 that arent there:

" Guidance on collaboration specifically with friends groups and non-philanthropic activities with those groups.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

" What philanthropic partners, especially friends groups, can do within parks.

CONCERNS:

- The new DO focuses solely on philanthropy and new money coming to the NPS. I could see where our existing partners and NPS watchdogs could view this new DO as a way of allowing the corporations/groups with the most money to have the most access to the NPS.

- The new options related to donor recognition (ex: using pavers with donor names, placing donor names on benches, allowing temporary room/program naming for high dollar donors, etc.) are generally positive, but the decision of when to use and not use these should be at the discretion of Superintendents and regional leadership vs. WASO.

- Seldom is the term friends group used in the document. These groups are lumped in with all other groups that could provide funds to the NPS. I don't think that it is a positive change to cease recognizing the unique relationship that friends groups have with parks and recognizing that these groups bring much more than just money to the parks. I believe that we need recognize this unique relationship within DO 21.

- The DO is very general about most of the most significant changes and says that the details of those will be included within the new DO 21 Reference Manual (yet to be developed). This makes it very challenging to know how some of these changes will be manifested.

- The DO lays out a new process for NPS staff and partners to obtain philanthropic certification to be allowed to approve donations and authorize fundraising campaigns at higher amounts. It doesn't reference whether those who don't obtain certification will be able to approve and authorize at lower levels, so it appears that all must accomplish the certification this prior to approving or authorizing at any level. It really isn't clear whether partners will have to undertake the training or will be offered the opportunity to take it. Based on conversations with WASO, I believe that the expectation is that they would be required to. My other concern is that the certification process is presently envisioned as a 40-hour in-class training plus a 40-hour on-line training. That is unreasonable to expect of NPS staff and especially partners (many of whom are managed by volunteer boards). I suggest a training that is no more than 16-hours and can be accomplished on-line or in-person.

- The new DO allows the Director and both Deputy Directors to solicit donations. This is a huge concern to some of our friends groups.

- The DO identifies NPS as the eventual sole owner of intellectual property created by the partners (or by the NPS and partners together) while under an agreement. The DO allows the NPS and the partner to both have use rights while the relationship is in place but eventually the NPS becomes the sole owner as the agreement ends and/or the organization goes defunct (a reasonable option if the organization no longer continues to exist). This is an issue for existing partners because many create program names, program logos, etc. and then work with other partners on those same programs. They invest all the money and time in creating creatives that we then ultimately own (but allow them to use, but not profit from).

- The DO disallows the use of the Arrowhead by any partners. Partners will now have to work with the NPS to use one of the secondary marks (which most people don't recognize as even reflecting the NPS).

- The new DO focuses solely on philanthropy and new money coming to the NPS. I could see where our existing partners and NPS watchdogs could view this new DO as a way of allowing the corporations/groups with the most money to have the most access to the NPS.

- The new options related to donor recognition (ex: using pavers with donor names, placing donor names on benches,

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allowing temporary room/program naming for high dollar donors, etc.) are generally positive, but the decision of when to use and not use these should be at the discretion of Superintendents and regional leadership vs. WASO.

- Seldom is the term friends group used in the document. These groups are lumped in with all other groups that could provide funds to the NPS. I don't think that it is a positive change to cease recognizing the unique relationship that friends groups have with parks and recognizing that these groups bring much more than just money to the parks. I believe that we need recognize this unique relationship within DO 21.

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- The new options related to donor recognition (ex: using pavers with donor names, placing donor names on benches, allowing temporary room/program naming for high dollar donors, etc.) are generally positive, but the decision of when to use and not use these should be at the discretion of Superintendents and regional leadership vs. WASO.

- Seldom is the term friends group used in the document. These groups are lumped in with all other groups that could provide funds to the NPS. I don't think that it is a positive change to cease recognizing the unique relationship that friends groups have with parks and recognizing that these groups bring much more than just money to the parks. I believe that we need recognize this unique relationship within DO 21.

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Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

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- The new DO allows the Director and both Deputy Directors to solicit donations. This is a huge concern to some of our friends groups.
- The DO identifies NPS as the eventual sole owner of intellectual property created by the partners (or by the NPS and partners together) while under an agreement. The DO allows the NPS and the partner to both have use rights while the relationship is in place but eventually the NPS becomes the sole owner as the agreement ends and/or the organization goes defunct (a reasonable option if the organization no longer continues to exist). This is an issue for existing partners because many create program names, program logos, etc. and then work with other partners on those same programs. They invest all the money and time in creating creatives that we then ultimately own (but allow them to use, but not profit from).
- The DO disallows the use of the Arrowhead by any partners. Partners will now have to work with the NPS to use one of the secondary marks (which most people don't recognize as even reflecting the NPS).

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 100

Author Information

Keep Private: No
Name: Gerry
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Rio Rico, AZ 85648
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As a retired NPS employee with more than 31 years service, I seldom comment on the inner workings of the NPS. However, I am extremely concerned about the proposed "Draft Director's Order #21: Philanthropic Partnerships for the National Park Service" to pursue corporate partnerships. These partnerships threaten to corrupt our national parks by -

- Letting corporate contributions influence park policies;
- Turning public servants into corporate fundraisers while diverting tax dollars to recruit and cater to corporate donors; and
- Plastering corporate logos across park fixtures, selling naming rights and licensing park images for commercial products.

Prostituting our parks is precisely the wrong approach for saving them. The role of the National Park Service is to protect and steward park resources, not to fundraise-which should be left to private "friends" groups or the National Park Foundation.

Please consider the 100 year old image of our National Parks as a refuge from the very thing this policy would destroy. Definitely NOT the manner in which to celebrate the NPS Centennial!

Thank you for the opportunity to comment on this extremely ill-advised policy. Please include my comments in the official record for Draft Director's Order #21: Philanthropic Partnerships.

Sincerely,

Gerry, NPS Retiree
(DINO, CEBR, BIBE, CANY-ARCH-NABR, UPDE, DEVA)

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 101

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Tacoma, WA 98403
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

NO CORPORATE LOGOS in our National Parks.

To Quote Teddy Roosevelt, "Leave it as it is. You cannot improve on it. The ages have been at work on it, and man can only mar it."

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 102

Author Information

Keep Private: No
Name: Andrew
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fort Collins, CO 80524
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am opposed to DO21 as currently written. Please remove all references to sponsors and sponsorships. Specifically, please remove section 6.2.4 and section 6.5 and all references thereto. Additionally, please remove all references to 'logo licensing' throughout, specifically in section 6.4.

Sponsorships and logo licensing are incompatible with the NPS mission of maintaining "unimpaired" for future generations the unique and remarkable landscapes, places, and history of our country. A corporate logo on a sign, bathroom, visitor center or any other location within a National Park is, in my opinion, incompatible with this mission. I fully understand the NPS is struggling to operate effectively with ever growing visitation and an insufficient budget, but I would rather see the infrastructure of the parks fall into disrepair than see a corporate logo in a National Park setting.

If corporate sponsors would truly like to help our National Parks please encourage them to donate funds to the National Parks Foundation, the Western National Parks Association, or any of dozens (hundreds?) of other non-profit organizations that support the national parks or individual parks. They can then advertise the fact that they've done so through traditional marketing outlets.

I am deeply disappointed that the Park Service that I love and support, that I spend weeks in every year, and whom I worked for throughout the west as I cut my teeth as a career professional in Natural Resources Management, would stoop so low as to sell themselves in this manner. I have every confidence that the Park Service will correct this by eliminating DO21 in its entirety, or eliminate those paragraphs noted above.

Thank you for your continued efforts to preserve our fantastic National Parks.

Sincerely,

Andrew

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 103

Author Information

Keep Private: No
Name: Alison
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Calgary, UN T2E 9C8
CAN
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Good Day,
If this initiative includes placing corporate logos in natural setting (not just visitor centers, information boards already existing etc) then it would be a devastating blow to the integrity, beauty and attraction of the parks. Placing billboard like signs in the forest next to things like old faithful or waterfalls should never be considered in this proposal. I as a Canadian would definitely consider not going on several trip I plan to USA national parks in the future if this happens. Placing signs in visitor centers is fine though.
Thank you

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 104

Author Information

Keep Private: No
Name: graham
Organization:
Organization Type: I - Unaffiliated Individual
Address:
snohomish, WA 98290
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am strongly opposed to the proposed policy changes regarding corporate sponsorship in NPS.
I find the idea of linking NPS and Bevmo/Budweiser alcohol reprehensible. Alcohol is a poison that kills millions globally each year. I do not want even small corporate logos visible within my National Parks! Corporations, by statute, have one goal; maximize profit. That goal is inconsistent with the purpose of the NPS.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 105

Author Information

Keep Private: No
Name: Karlene
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Rochester, NY 14618-4861
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is a terrible idea.

First, since the plan repeals the ban on commercialism in parks, corporate logos could be plastered across virtually any park fixture - from benches to equipment, even the bricks under your feet on trails. In short, visitor areas would become venues for product placement as every park would be required to offer naming rights for sale.

At the same time, corporations would be able to license park names to pitch their products. So we can expect to see ads featuring Old Faithful promoting Viagra, the Statue of Liberty selling Victoria's Secret lingerie and even the Lincoln Memorial for hemorrhoid cream.

Second, tying park budgets to corporate dollars inherently gives corporations influence on how parks operate. We have already seen contributions from Coca-Cola, maker of the nation's biggest selling brand of bottled water - Dasani - has blocked parks from banning sales of bottled waters. The bottles can then be found all over the park in pristine areas.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 106

Author Information

Keep Private: No
Name: Diogenes N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Center, TX 75935
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/11/2016	Date Received: 05/11/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Goddamnit NO!!!!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 107

Author Information

Keep Private: No
Name: Adam
Organization: NPS
Organization Type: I - Unaffiliated Individual
Address:

Arcata, CA 95521
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As a seasonal NPS Lead Interpretive Ranger in Yosemite Valley, I saw first hand how the director's waivers affected the Yosemite Valley Visitor Center. Corporate logos were in plain view of visitors on banners, on handouts, and corporate logos play on a loop on a monitor in the Visitor Center. The quality of the visitor experience is negatively affected by having corporate advertisements in national parks. Displaying ads in public view within park facilities, I feel, is inappropriate, and I feel embarrassed to have such logos prominently displayed in my favorite places. I don't work for Subaru or Anheuser-Busch, nor do I want to.

If Congress won't give us the funds we need, then sure, companies can donate to the parks, though I have some issues with that, as well. Such funding is clearly the reason for the Director's recent compromises. My main concern, however, is the posting of advertisements in the parks. If a company should choose to donate money to the park, I feel that we are in no way obligated to display their logos. This action sets a precedent. It creates expectations that donations will be rewarded in the park system with advertising space. This is effectively an implied sale of advertising space. Potential future donors may now rightfully expect to have their advertisements posted in visitor centers, on park vehicles, and elsewhere. We are selling out the parks, and our own integrity as an agency.

Having specific guidelines to address what size logos can be, where they can be posted, and how prominently is not enough. The Director's Centennial waivers are yet one more shameful act to heap onto the negative image the NPS has rolled out for our anniversary.

Visual displays in parks should only exist to orient, educate, and interpret the resources to visitors, and enhance their experience of these resources. We are public servants, and we are tasked with looking out for the good of the people as a whole, not just corporations. Posting ads only benefits these wealthy entities, and not the average visitor.

Who are we really working for, and who should we be working for: the public, or private interests? Bowing down to the

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

donors we now depend on sends the message we have sold out, and no longer work for the people as a whole. Can funding be withheld if our actions don't conform to a donor's will? Private industry controlling our budget might allow for compromises in our actions in areas like park development or interpretation. How can we expect to speak openly in interpretive programs about issues that may be contentious to those who pay our salaries? I see a potential loss of control for the agency, as our purse-strings are now held by industry, not elected officials. What mechanisms are in place to prevent the NPS from being led astray by corporate carrot-dangling?

To me, it is unacceptable to see car and beer company advertisements in public spaces. It is a blight on the visitor center, which is an education and interpretive space for visitors, one of the few places people may visit where they are not constantly bombarded with ads. Seeing large Subaru decals on the sides of our park vehicles detracts from scenic landscapes, again, one of the few places many visitors will see without ads dotting the landscape. Lastly, the NPS so proudly displaying our corporate partners' ads makes us seem more like an amusement park than a public service. Is that really the image we want to present? There are hundreds of theme parks in the world, but only one Yosemite National Park. Let's keep it uniquely free of billboards, no matter how small.

I expect my concerns to be addressed, as is required by law. Specifically, I want justification for exactly why we need to post the corporate logos of our donors prominently in public places, or at all, for that matter. Also, please explain to me how this is not impliedly soliciting advertising space. There may be a legal argument counter to this proposed Director's Order on these grounds. Also, explain to me how posting these ads contributes positively to the visitor experience. Lastly, fill me in on how exactly this does not constitute a potential loss of control in agency discretion, considering our new sources of funding. Thank you for giving my position due consideration.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 108

Author Information

Keep Private: No
Name: Cecelia
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Damascus, OR 97089
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I cannot put in words the feeling I get when I enter an unretouched national park or protected scenic area. My earliest memories are of times with my parents in Yosemite and the Sierra Nevada. I just can't bear the thought of those memories being tainted with the glaring logo of some corporation or another. When I enter these parks now, they truly make me feel a part of two things larger than myself and great: America and God. And I'm not a "patriot" and I'm an atheist, so this is REALLY saying something. Corporate logos cannot help but distract visitors from these two really grand ideas; they cannot help but make our parks somehow less grand and awe-inspiring than they are. There is nothing more beautiful in the world to me than our country's natural spaces- -please, please, PLEASE, ask these businesses to consider rights to promote the beauty of the park, perhaps, but OUTSIDE OF THE PARKS themselves. To allow the parks to remain something greater than even these corporations. Please allow the parks to be one thing that we don't commodify or Disneyify. They are just so lovely, in their original, simple, rustic state.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 109

Author Information

Keep Private: No
Name: Greg
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Davis, CA 95616
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/11/2016 Date Received: 05/11/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is a very dangerous path. Corporate influence is infiltrating our lives like never before in history. Millions and millions of dollars are pouring into political campaigns at the behest of corporate interests. The National Parks and Monuments have been SET ASIDE for public enjoyment and for the preservation of natural and historical sites.

Giving into the temptation of corporate money, which will only shade our beloved spaces with a perverse coat of printed hyperbole.

The National Park Service has neither the time nor the resources (nor should they) to fully vet every organization that wishes to participate, and therefore cannot guarantee that a participatory company only wishes to align itself with an American treasure only to provide itself with the protection of what amounts to a public relations campaign.

In short - they need you a lot more than you need them. With an election on the horizon - providing the possibility of better funding outright, this step is completely unnecessary at this time, and can only violate the very basic tenets of the 100 Year Old National Parks charter.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 110

Author Information

Keep Private: No
Name: Robert
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Santa Fe, NM 87507
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I agree entirely with the sentiment and opinions of the Santa Fe New Mexican Editorial* of May 12, 2016 that corporate sponsorship of our National Parks undermines America's Best Idea. Parks should be a place to get away from commercialism. Capitalism is behind the 'rape' of many a natural wonder - give 'em an inch and they'll take a mile. Please find better ways to raise funds. For example, I'd be happy to renew and pay \$10/yr for my Universal Park Pass Fee.

*http://www.santafenewmexican.com/opinion/editorials/our-view-keep-commercialism-out-of-nation-s-parks/article_b03ac6b2-0e30-59ac-a501-3712462ea5c6.html

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 111

Author Information

Keep Private: No
Name: Barbara
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Moab, UT 84532
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This new policy means selling out our national treasures: our Parks. These are NOT commodities, nor should they be commodified. Republicans have reduced NPS funding over the years to create this maintenance backlog, setting up for a policy change such as this. It's a short stretch to privatizing them completely. NO!!!

Parks are Parks because of their natural and cultural beauty and significance. They should not have logos and ads pasted over them. This is one of the last places in our culture that can be free of such stuff. Congress needs to up the funding so that they can be maintained properly. If they can't do that, I'd rather see them dilapidated than selling them out with this policy change.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 112

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Glorieta, NM 87535
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please keep our national parks free of commercialism. We need a place to escape from the constant cultural commercial messages.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 113

Author Information

Keep Private: No
Name: Christian
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98126
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

To the National Park Service.

Please, for the love of wilderness and wild spaces, keep commercialization of the National Parks on the cutting room floor.

Those that seek the National Park experience, do so to find solace from the modern world. Adding corporate sponsorship of iconic areas and parks, only degrades the experience - certainly do not enhance.

In short, this is a TERRIBLE idea. Please stop the nonsense and get back to managing beautiful wild places; places where I don't have to see a god damn Coca Cola sign.

Christian

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 114

Author Information

Keep Private: No
Name: Brittanie
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Los Angeles, CA 90025
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I work in Museums and other non-profit spaces to create exhibits for the public. I understand the vital need for corporate and private funding in organizations. Unfortunately, I have seen too many instances in which corporations who offer funds alter messaging and presentations to be more amenable to promoting their corporate culture. It is hard to believe that this kind of sponsorship will not negatively effect the National Park's ability to maintain complete creative and managerial control of their spaces.

The National Parks have always been a place I can retreat to to get away from the onslaught of consumerism I am faced with on a day to day basis. This is something I admit I take part in but am working to cut back on in this new social and political climate. If there will be sponsors, hopefully they will be thoughtfully vetted to ensure that their manufacturing practices, worker conditions and underlying principles are making the world a better place. Please turn away any sponsor who is not a conscious protector of all human rights or the environment.

Thank you for your time.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 115

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Los Angeles, CA 90069
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please please please do not open your naming rights up to corporations. Lobby congress to find another way. Bring this issue to the public. Get notice on your side.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 116

Author Information

Keep Private: No
Name: Alex
Organization: Grand Teton Lodge Company
Organization Type: I - Unaffiliated Individual
Address:
Moran, WY 83013
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

To whom it may concern,

Grand Teton Lodge Company (GTLC) is in support of the National Park Service seeking new opportunities for Philanthropic Partnerships. We understand the need for additional funding sources to successfully meet the Park's needs in the next century and beyond.

I'd like to specifically address the proposed Checkout Counter Program outlined in section 4.6.3. Since 1999 GTLC has had a very successful program allowing guests to donate \$1.00 per night to the Grand Teton National Park Foundation. When we took over the Flagg Ranch operation in 2011 we immediately implemented this program and beginning in 2017 (the first year of the 2nd century), we've changed this optional donation to \$2.00 per night at all properties. In the years since inception we've raised almost \$1M in total and have assisted the foundation in implementing this program at other facilities outside of the Park. In short this program has been very successful and we've formed a very strong relationship with the foundation as a result. We feel that the proposed changes in the draft will add unnecessary administrative expenses to the process reducing the direct benefit to the park and will also make the program more difficult to explain to our guests and employees thereby potentially reducing the participation.

We urge you to reconsider the proposed changes in section 4.6.3 of the draft document and allow successful programs such as ours to continue without change.

Respectfully,

Alex
Vice President and General Manager
Grand Teton Lodge Company and Flagg Ranch Company

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 117

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Knoxville, TN 37901
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for soliciting public comments. I believe this revised DO21 does not go far enough in allowing the support of private donors to help support our national parks. While I am not in favor of allowing corporations to buy naming rights or branding of parks, unit, or specific features, large donors should be thanked by allowing their name to be publicly visible as part of a facility they help support. Each year, NPS non-profit partners (education partners, friends groups, association groups), forgo millions of dollars of direct gifts because of the strict policies on naming facilities. Most of these park partners do not receive operating funds from NPS and therefore rely on fees and public support. Public recognition of donors is a crucial way such partners can achieve their fundraising goals that are required for them to help support the NPS mission.

While there does not need to be a totally open policy of allowing naming rights for any/all building and sites, a more flexible process should be established that allows such opportunities to at least be considered on a case by case basis, especially for large gifts. As the NPS budget continues to shrink, greater allowance must be made for attracting and keeping private donors.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 118

Author Information

Keep Private: No
Name: Kris
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Portland, OR 97225
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The mission of the National Park System is "...to promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." National Park Service Organic Act, 16 U.S.C.1.

The proposed philanthropic partnerships proposed are contrary to this mission.

I am a retired physician who has developed a new appreciation of National Parks and donate to the Foundation. I'm currently auditing a class on the National Parks at Portland State University, taught by respected geologist Scott Burns. He participated in a panel discussion organized by the Nature Conservancy earlier this week at the Oregon Museum of Science and Industry.

The panelists decried the lack of investment in infrastructure. This included human infrastructure. Following the discussion, we watched "National Parks Adventure" narrated by Robert Redford.

I would never criticize the product placement of an REI tent and commercial sponsorship of a movie that is promoting the National Parks.

However, I am concerned that philanthropic partnerships will allow corporate donors to exert influence on park policies and do not want to see park images licensed for commercial purposes.

Park Service Director Jon Jarvis was wrong to have signed a waiver in January 2015 without public notice, which allowed the National Park Foundation to accept \$2.5 million from Anheuser-Busch. As a "premier partner" for the National Park Service Centennial campaign, the National Parks are co-branding with Anheuser-Busch their "Responsible Drinking Campaign" for park concerts aimed at youth undermines the National Park's mission.

Corporations, like individuals, should be encouraged to donate to the National Park Foundations. The proposed philanthropic partnerships are a slippery slide to a quid pro quo.

Philanthropic partnerships could allow greenwashing.

More than 60 years ago, Congress carved the Eagle Mountain area out of Joshua Tree National Monument (now a National Park) so that the industrialist Henry Kaiser could build an iron mine. The Eagle Mountain site was supposed to have been returned to the National Park Service when mining operations were complete. Instead, the former mining company has held the land and first tried to develop a garbage dump, then sold it to Eagle Crest Energy for the hydropower plant.

In June 2014, the Federal Energy Regulatory Commission approved a hydropower proposal at that site; and last October it rejected appeals from the National Park Service and the Desert Protection Society, a local conservation group. To fill the hydropower plant's reservoirs, water will be pumped from an aquifer connected to groundwater basins beneath Joshua Tree National Park. Tapping that aquifer would endanger the complex ecosystems of that park.

Frankly, it's astounding that National Park status did not preempt commercial development plans. The site's owners won't allow federal regulators access to the property to conduct an environmental assessment. The Bureau of Land Management must rely on what the Department of Interior criticizes as "stale data" to decide whether to grant the infrastructure right-of-way.

How would the National Park Foundation respond if Eagle Crest Energy dangled money to win the hearts and minds of the community in becoming a "premier partner" of Joshua Tree National Park? (Never mind the hearts of species like the desert night lizard, Mojave mound cactus and threadleaf groundsel, Scott's oriole and the American kestrel that live among the Joshua trees- -a species predicted to be dramatically impacted by climate change.)

The problems of inadequate funding are rooted in budget inadequacies that include corporate tax evasion of many flavors. It's also a spending problem. In the United States, credible estimates of annual fossil fuel subsidies range from \$10 billion to \$52 billion annually. These estimates don't include costs borne by taxpayers related to the climate, local environmental, and health impacts of the fossil fuel industry.

The proposed philanthropic partnerships make it a whole lot easier for companies to greenwash. Please do not facilitate corporate social irresponsibility.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 119

Author Information

Keep Private: No
Name: Ed
Organization: Gettysburg National Military Park/Eisenhower National Historic Site
Organization Type: I - Unaffiliated Individual
Address:
Gettysburg, PA 17325
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

On behalf of Gettysburg National Military Park and Eisenhower National Historic Site, I applaud the National Park Service's proposed revisions to Director's Order #21: Philanthropic Partnerships. This excellent document offers a creative and broad set of blueprints to guide superintendents as they work with partnerships and philanthropic entities. As a superintendent of a park with very dynamic and robust philanthropic partner, the Gettysburg Foundation, we appreciate the draft's clear guidance on so many of the issues that we deal with on a daily basis. We applaud the general shift of delegation from the Director to the Superintendent level for accepting park donations.

In addition to our broad support for the draft, we offer a few comments here on some specific issues:

Page 17, line 572 - We applaud the approval of the checkout counter donation program and we have had good success with this in our bookstore, but disagree that it should exclusively benefit the National Park Foundation. Where is the incentive for major park partners to do it when it benefits another non-profit and not their own fundraising needs?

Page 21 line 768 - Since our partner, the Gettysburg Foundation, owns and operates our Museum and Visitor Center, the strategic philanthropic partners' category is excellent and would apply quite well - however the agreement terms suggested are 1 to 3 years maximum and this is a very short period of time. Can the NPS create a long-term strategic philanthropic partner category?

Page 22 line 796 - The thresholds are described here for each level of philanthropic partner. We're happy to see the policy make a distinction between different levels of partnership. We question if it describes the true levels between the partners. And who oversees it... Every park and partner will want legacy status.

Page 26, line 956 - Regarding the approval process for the use of NPS marks and arrowheads: A partner's use of arrowheads and NPS marks should be identified in their partnership agreement and they should not have to request individual uses of the arrowhead to promote park-sponsored special events in communities. It seems unnecessary to elevate this approval above the

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

park level.

Page 27, line 970 We hope the NPS will allow the partner to accept federal funding, match it with partner-raised funds, and allow the partner to manage projects. The private partner can do the job cheaper, and more effectively than the NPS, and it can still be co-managed by the NPS with all the necessary requirements.

May 12, 2016

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 120

Author Information

Keep Private: No
Name: M Kathleen
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98118
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I strenuously oppose the use of corporate sponsorships within the National Park System as well as their brand on any national monument, park, wilderness area, or other public lands. Public lands represent an important refuge from the corporatism that infuses every aspect of our lives; furthermore, the idea that Coca Cola, Pepsi, Monsanto, Nestle, or whichever other corporation "brought" us these natural wonders and cultural heritage, is a gross misrepresentation of the bio-physical processes which formed these national treasures.

I understand NPS has a significant backlog of maintenance and needs to fund these repairs in some way. However, our federal government should be funding the maintenance and upkeep of the parks, not corporations.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 121

Author Information

Keep Private: No
Name: Chance
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Mill Valley, CA 94941
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The newest promotion of public-private partnerships in our National Parks is dangerous.

Though philanthropy has long contributed to the resilience and growth of our National Park system, the newest Director's Order on Philanthropic Partnerships will break away from the traditional private philanthropy and give corporate donors much greater influence of National Park Service (NPS) decisions. Branding with NPS logos and symbols, advertising both in and outside of public parklands, and squeezing out of taxpayer funds will move the NPS away from the next century of inclusive parks management it should be embracing. The NPS should be fighting for the congressional appropriations our parks deserve, not adding more "Bud Light" signage on park benches and interior spaces. If there is trouble with appropriations, then why not engage the American people and lead us to lobby and fight for our parks on this special year, the NPS Centennial?

The public needs safeguards to protect our lands from the encroachment of commercial development and corporate marketing campaigns. We get those things in urban settings, in suburbia, in the paper, and on television. They aren't needed in the places where we seek to recreate, reflect, and replenish our spiritual energies. Mr. Jarvis, if you view yourself as a visionary, if you think you have learned anything about the values of these grand common lands, then I urge you to reevaluate the path you are leading the NPS and this country down. The NPS must focus on management of our public trust assets and conservation and preservation of our resources, not on allowing park managers to make phone calls to corporations to fundraise like our congressmen and congresswomen do.

Today our parks need more protection than ever.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 122

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Mui Beach, CA 94965
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am concerned about pending plans for the National Park Service to pursue corporate partnerships. These partnerships threaten to corrupt our national parks by -

- Letting corporate contributions influence park policies;
- Turning public servants into corporate fundraisers while diverting tax dollars to recruit and cater to corporate donors; and
- Plastering corporate logos across park fixtures, selling naming rights and licensing park images for commercial products.

Prostituting our parks is precisely the wrong approach for saving them. The role of the National Park Service is to protect and steward park resources, not to fundraise-which should be left to Congress.

Please halt this misguided plan. Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 123

Author Information

Keep Private: No
Name: Ray
Organization: NPS-PWRO
Organization Type: I - Unaffiliated Individual
Address:
San Francisco, CA 94104
San Francisco, CA 94104
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I entered comments today up to line 823 and they disappeared not sure if they were entered or are lost and I have to re-enter them.

Line 823and 824 Change to read "long-term 5-20 year working relationship frameworks between the NPS and its NPS philanthropic partners anfd authorize them to fundraise of a park or progrm .

Line 829 "Strategic" implies long term which many of these are not. Is there a better, more descriptive term? Maybe "Specific" or "Select" Initiative Funbdraising Agreement?

Line 841 Change to read "location placement...."

Line 859 Change to read "permitappropriate to the degree of risk and liability exposure."

Line 873 and 874 Does this really inform fundraising feasibility determination?

Line 862 This abbreviated discussion of IP is not very inforamtive and should be expanded.

Line 882 Change to read: "an agreement or realtionship,..."

Line 944 Change to read: "retain and attract valued employees and attract and retain customers and clients..."

Line 963 Change to read: "play an active role and/or contract for all or part of the design and construction process...."

Line 970 Change to read: " participater in designing and constructing facilities and improvements in..."

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Line 979 Change to read: "NPS appropriations."

Line 985 Change to read: "sustainable and meet NPS accessibility requirements."

Line 991 Change to read: "maintenance, operations, accessibility and sustainability."

Footnote 6 -Change to read: "the upfront transfer of..."

Line 1009 Change to read: "and the partner..."

Line 1024 After "contributions." Insert "Public donor recognition also informs and helps motivate others to donate."

Line 1029 Change to read: "rights in any..."

Line 1032 Change to read: "The interests of donors...."

Line 1039 Change to read: " a donation involving on-site recognition,..."

Line 1043 Delete ",to the extent the law allows,"

line 1075 Change "annual" to "periodic"

Line 1078 Change to read: "different types and levels of donations."

Line 1080 An issue is whether there should be a single donor recognition plan for the NPS and Park partner as we require for a capital campaign.

Line 1119 Change to read: "purpose and primary natural and cultural resources."

Line 1123 Change to read: "consider the sustainability and likelihood of vandalism and the cost of"

Line 1135 Change to read: "signs and directional, regulatory, or..."

Line 1137 Change to read: "programs and displays may..."

Line 1152 Display of corporate script and logos is advertising in parks. Should be limited to corporate donor name.

Line 1195 Corporate script names and logos on vehicles is not different from park furnishings and constitute advertising in parks. Strongly suggest this not be allowed and use regular type recognition on the vehicles.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 124

Author Information

Keep Private: No
Name: Tim
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Boulder, CO 80304
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please let's not entertain corporate advertising of any kind in our National Parks. One of the beauties of these parks is that they give us a respite from advertising. We should fund our parks through taxation, and not sell the experience to corporate entities.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 125

Author Information

Keep Private: No
Name: Gerald
Organization: Sierra Club.
Organization Type: I - Unaffiliated Individual
Address:

Phoenix, AZ 85022
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am totally against this arrangement!!!! Tell Congress to start Funding the NPS they way it should be, taking monies from the DOD where waste, fraud and about is probably 3 times what the park service needs. I understand that we have a Republican Congress that doesn't give a hoot what the people of America care about and that is such a sad commentary on people we have sent to Washington to represent US!
Stop this ridiculous idea right now, before our parks become nothing more than Corporate Americas'advertising agency!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 126

Author Information

Keep Private: No
Name: kevin
Organization:
Organization Type: I - Unaffiliated Individual
Address:
fenton, MO 63026
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not sell-out our federal park system.
Is corporate sponsorship the only solution for the current lack of funding?
Have at least some pride in our country.
Pressure Congress for more money.
Get creative.
Mount a national small-donation campaign like Bernie Sanders has done.
Do something - anything - besides turn over our parks to advertisers.
Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 127

Author Information

Keep Private: No
Name: Craig
Organization: Mr.
Organization Type: I - Unaffiliated Individual
Address:
Norwood, CO 81423
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Our parks are our natural churches, holy places for American culture. I understand that not enough money is available to properly protect these places, but a worse tragedy is letting private hands smother what we hold so dear. What makes these places so powerful is that they belong to all of us. They are not private, not branded. Please, please, keep them that way. So much is already owned and co-opted. So much is contrived, controlled, named, and patented. Don't let our most sacred landscapes fall to private urges. Thank you. Craig

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 128

Author Information

Keep Private: No
Name: Maureen
Organization:
Organization Type: I - Unaffiliated Individual
Address:

Crested Butte, CO 81224
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/12/2016 Date Received: 05/12/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am strongly opposed to Order #21 for the following reasons:

- 1) Park Service employees are already overburdened and to require program managers and superintendents to "complete a training certification program to develop the knowledge base and skills for success in philanthropy and partnerships" is a ridiculous use of their time. To expect NPS employees to manage and foster relationships with corporations is found nowhere in the mission of the NPS.
- 2) Order #21 states: "Public private partnerships, with for profit and non profit corporations play a key role in supporting the NPS mission." Really? What documentation supports this statement?
- 3) The cause-related marketing campaign to 'co-brand with a corporation' is appalling. The NPS Mission does not state or imply that our National Park Service should identify and 'strengthen the assets' of a donor/corporation. No doubt the co-branding will 'generate profits' but at what cost to our parks?
- 4) Collecting donations by corporations in our National Park bookstores is offensive. I do not visit our National Parks to see corporate names in bookstores, on park facilities, interior rooms, walkways or stones. The joint use of corporate/partner logos with the NPS logos is a terrific way to promote the corporation's brand but does nothing but degrade our NPS.
- 5) I visit our National Parks frequently. Just a few weeks ago I spent 4 days at Zion. Amazing. However, I would never visit a park where an in-park recognition of a corporate donor was held. Using a visitors center or another developed area to recognize (promote) a corporate donor would certainly discourage visitors. To see Park Service vehicles, benches or furnishings with corporate logos would also, not only be offensive, but would distract from the beauty and treasure that our National Park System offers all of us.

Please don't allow this ill-conceived document to be approved.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Maureen Hall

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 129

Author Information

Keep Private: No
Name: Matt
Organization: Friends of Haleakala National Park
Organization Type: I - Unaffiliated Individual
Address:
Makawao, HI 96768
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The Friends of Haleakala National Park recognizes the positive impact that donors have on our Parks. We also recognize the need to recognize donors for their contributions. However, we are strongly opposed to donor recognition that becomes donor advertising displayed in our public parks. Hence, we are opposed to allowing corporate advertising on vehicles donated to the Park. We are opposed to corporate logos, branding or corporate slogans placed on fixtures in the Parks. Acknowledgement of donors should be discrete. Donor advertising should never be displayed in any way to disturb natural environments, soundscapes or views. Donor advertising should not be visible from primitive areas such as along trails, in campgrounds or in the wilderness. Instead, donor recognition displays should be limited to discrete displays in significantly developed areas such as visitors centers or courtyards.

Thank you,
Matt, President Friends of Haleakala National Park

The Friends of Haleakala National Park is a volunteer organization operating for 20 years to Promote, Protect and Improve Haleakala National Park, in partnership with the NPS.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 130

Author Information

Keep Private: No
Name: Ray
Organization: NPS-PWRO
Organization Type: I - Unaffiliated Individual
Address:
San Francisco, 94104
San Francisco, CA 94104
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

General Comments:

Great to see many changes that we have long advocated for: partner in-park fundraising, delegation of approval authority, clarifying NPS staff roles in fundraising, electronic donations, etc.. Some concerns about increased corporate brand display in parks which is de facto advertising, implied priority of corporations over friends groups and characterizing corporate advertising investments as philanthropy. Will discuss in appropriate sections.

Title of DO#21 and Lines 11-16 : Corporate Sponsorships and some aspects of Cause Related Marketing are business investments rather than philanthropy. A title of Philanthropic Partnerships and Corporate Sponsorships or Funbraising would be more accurate.

Line 3: Change to read: "continuing' rather than "noble"

Line 9: Change to read: "for" rather than "in"

Lines 11-12: Delete "over the last decade" It's been a happening since the first parks.

Line 14: Change to read: "should:(1) understand park philanthropy..."

Line 15: Change to read: "objective" rather than "impartial" - we are not impartial

Line 17: Change to read: "recognize all donors and donations..."

Line 19: Change to read: "formal relationship. So it's important for NPS to enter..."

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Line 21: Change to read: "private party's fundraising activities." For many parks, it's one party.

Line 38: Change to read: "Interior and our key philanthropic partners."

Line 41: Change to read: "organizations and foundations, corporations and local businesses with years..."

Related Sources of Guidance: Should also list DO#7, DO#53 and DO #52 which also baer on partnerships.

Line 80: Change to read: Authority for Director's Order #21

Lines 122-123: Delete "been identified in"

Lines 152-155: Clarify who authorized employees are. e.g., superintendents, management assistants, admin officers, etc who deal with partnerships. many park staff do these days. Unclear as stated.

Line 162: Change to read: "the appropriateness of the donation."

Line 173: Change to read: "Department or may have a conflict of interest;"

Line 181: Change to read: "goals: policies; plans and model agreements."

Line 183: Change to read: "before their distribution for accuracy and appropriateness;"
{Public Lands Alliance Coalition is pushing back on this but their review panel was large friends groups and this preview is important.

Line 187: Change to read: "donors in a timely manner constant ..."

Line 191: Change to read: "in parks and online..."

Line 201: Define "others"

Certification and Training - Need to get real on this to shorten and make more accessible on-line. Travel ceilings will continue to limit travel. Time is limitation. Need to consider most decisionmakers are supported by a knowledgeable experienced staff amking judgements and recommendations. Also need to dtermine how to certify experienced individuals who are already knowledgeable. Also needs to be manageable given limitedstaff sizes all around including WASO.

Line 254: Change to read: "Review and approve..."

Line 262: Agree on national in scope partnerships but regions can coordinate on some multi-regional partnerships e.g., MAPR. WASO office has very limited staff capacity and needs to delegate more.

Line 264: Change to read: "development and certification ..."

Line 275: Change to read: "corporate contributions that are tied..." Not donations in most cases.

Line 310: Delete: "in one region;"

Line 326: Change to read: "course or meet the requirements"

Line 330: Change "areas" to read "park units"

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Line 333: Change to read: " with their philanthropic park partner(s)"

Line 338: Change to read: " \$250,000 through their Regional Office to the WASO..."

Line 346: Change to read: "superintendents and their key staff serve" It's more than the Superintendent.

Line 335: Change to read: "NPS-Sector"

Line 361: Change to read: "outside the NPS as appropriate to inform members..."

Line 367: Change to read: "(such as tax-exempt, nonprofit..."

Line 372: Change to read: "approved NPS agreements"

Line 378: Change to read: "identified project and program needs..."

Line 384: Change to read: "manage a dedicated or investment account(s)..." Many partners don't have endowment accounts but most have dedicated accounts>

Line 404: Change to read: "NPS projects and programs..."

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 131

Author Information

Keep Private: No
Name: Mark
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Pelham, NY 10803
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I understand that the parks budget has been underfunded for years, and I am not opposed to short-term co-branding opportunities such as (hypothetically) "Budweiser Salutes 100 Years of National Parks," please come and buy a \$6 Bud Light. But to re-name structures or spaces, or to splash brand names on vehicles and such, violates the core idea of the parks as intended by Teddy Roosevelt, John Muir and all the men and women who fought to create them and who still work extremely hard for not a lot of money in order to maintain them. These jewels are not football stadiums. They belong to the American people; they are, in their way, sacred. To exploit that holiness would be not only vulgar but profane.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 132

Author Information

Keep Private: No
Name: Alexander
Organization: High Country Conservation Advocates
Organization Type: I - Unaffiliated Individual
Address:
Crested Butte, CO 81224
Crested Butte, CO 81224
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

We (HCCA) strenuously oppose the latest contemplated policy to ramp up corporate financial support, and display of corporate support, within our nation's National Parks. This is a continuation of a dangerous policy that will lead to degradation of parks into theme and thrill locations, devoid of the psychologically-regenerative and spiritual values upon which the parks began to be founded over a century ago.

Parks sink or swim through political largess, and depend on a continuous source of congressional funding we know. Yet, this latest move to increase the influence of corporations into all aspects of daily life is a bold mis-step that we fear the parks administration, and the American public, will come to rue for decades to come.

Sincerely,

Sandy
Board President
HCCA
Crested Butte, Colorado USA

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 133

Author Information

Keep Private: No
Name: Mary
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Crested Butte, CO 81224
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Our National Parks are an essential heritage of this country, one that is not replicated anywhere else in the world. They were created by visionaries who rightly discerned that the people - - all the people - - deserve to own the country's wildest and most beautiful places as American citizens, confident that this birthright would be passed down to their children. Careful management of these gems is a prime responsibility of the federal government. Selling off the family jewels to the highest bidder would be a traitorous act. If the government needs money, raise the tax rate on those who covet our parks, reminding them that not everything is for sale in this country.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 134

Author Information

Keep Private: No
Name: Carol
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Moab, UT 84532
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As a former park ranger, I want our public lands to remain public. This is a dangerous track we are headed down if corporations are allowed to sponsor things, places, open spaces. We cannot foresee all the ways our parks could be affected. We cannot "half-protect". Parks need money. They always have. But only those people who visit them and get rewarded by a special feeling that money CAN'T buy will understand my position. I want my tax dollars to be spent on taking care of the spaces, the places, the things that belong to us all. Once special interests get a foot in the door, the door will be forever opened to the highest bidder. I want my children and grandchildren to experience non-sponsored, non-commercialized open space. I want the next generations to know that not everything has a price tag other than the price of admission.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 135

Author Information

Keep Private: No
Name: Jennifer
Organization: Shenandoah National Park
Organization Type: I - Unaffiliated Individual
Address:
Luray, VA 22835
Luray, VA 22835
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

3.1.5 Director and Deputy Directors
line 223 "Have a goal valued over \$5 million:"

Seek clarification on "over \$5 million" does that mean \$5 million over the life of the agreement, for a single target project or over a year?

4.2 Use of Donations

Line 436-439. Approval to use donated funds for some permanent salary. Bravo!! This is a welcome change. My only comment would be to expand the use of donated dollars for permanent salary when any permanent employee is working on a project funded by donations and not limit it to endowments or capital improvement projects.

Clarification requested on what would constitute a "capital improvement" - new construction, upgrades in materials or improved access? Will this be in the RM?

4.6.3 Checkout Counter Donation Program

Line 579-585. I vehemently disagree with the position that all donated funds from this program need to be run through the NPF. Parks with established philanthropic partners should be able to have the funds transferred directly to them. By filtering these donations through the NPF, the park that the visitors in making the donation to support loses a percentage of those funds. Requiring the funds to be transferred to the NPF also delays the park philanthropic receiving those funds. Requiring the NPF to be a go between is an unnecessary administrative step.

Jennifer
Deputy Superintendent
Shenandoah National Park

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 136

Author Information

Keep Private: No
Name: Leslie
Organization: Grand Teton National Park Foundation
Organization Type: I - Unaffiliated Individual
Address:
Moose, WY 83012
Jackson, WY 83012
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

May 13, 2016

To Whom It May Concern:

I write today to provide comments on the proposed revisions to Director's Order#21. Grand Teton National Park Foundation (GTNPF) appreciates the National Park Service's efforts to update DO#21 and strengthen its philanthropic partnerships. We have signed on to the comprehensive comments on DO#21 provided by the Public Lands Alliance and have participated in meetings to assist in the development of those comments.

In addition to the comments conveyed through Public Lands Alliance, we would like to elaborate on one particular area in the proposed revision specific to GTNPF's work, the Checkout Counter Program detailed in Section 4.6.3.

For 17 years, our Foundation has worked with park lodging partners (Grand Teton Lodge Company and Signal Mountain Lodge) on what we refer to as a dollar-per-night program, where an additional dollar per room night is added to a guest's bill at the lodges within Grand Teton National Park. At checkout, a guest can elect to opt out of the additional donation if they choose. Lodge guests have been receptive to the concept. All four lodges in Grand Teton participate in this program.

At the beginning of each season, GTNPF staff coordinates with the lodge operators and provides training to frontline lodging staff so that they can accurately describe to their guests what projects in Grand Teton are supported by this contribution and so that they are prepared to share information with room guests about those projects, if requested. This program has provided significant funds to park priority projects over the years. It has also resulted in strong partnerships with these businesses, and these partnerships have benefitted Grand Teton National Park beyond the dollar-per-night program.

We see only downsides to Grand Teton National Park from routing these funds through the National Park Foundation. Such a

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

change would unnecessarily add an administrative layer to an established and well run program and would reduce the funds that ultimately flow to programs and projects in Grand Teton. We also believe that this could confuse room guests when they learn that their contribution will be sent to Washington DC, rather than staying in Grand Teton-we are concerned that this could ultimately result in less participation by room guests.

For the benefit of Grand Teton National Park and out of respect to GTNPF's important long-standing relationships with our lodging partners, we ask that you please reconsider the proposed revision so that this mature and successful program can remain in place unchanged.

Respectfully,

Leslie, President
Grand Teton National Park Foundation

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 137

Author Information

Keep Private: No
Name: Mike
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Santa Fe, NM 87501
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please stop the commercialism of our national parks! I am sad to see the nation's greatest assets plastered with corporate logos. Please end this nonsense.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 138

Author Information

Keep Private: No
Name: Kevin
Organization: Acadia National Park
Organization Type: I - Unaffiliated Individual
Address:
Bar Harbor, ME 04609
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for the opportunity to comment on the draft DO-21. Overall this director's order is a great improvement and will make it easier for parks to work with partners. I offer these comments as park manager who has worked closely with partners at multiple parks during my career and hope they are helpful.

Here are some specific comments:

Page 7 - line 209 - I appreciate and support the increased delegation of authority to superintendents and regional directors for approving donations and philanthropic agreements. The draft delegates this decision making appropriately.

Page 10 - lines 313 and 336 - The DO should clarify that the donor vetting referenced is limited to direct donations to the NPS. Indirect donations from an individual to a partner are vetted thru the partner.

Page 10 - line 333 - Suggest revising the language to read, "Develop an annual work plan or equivalent" to reflect the reality that many parks and partners have their own internal processes for determining their annual work plans. These are guided by comprehensive fundraising agreements, design and construction agreements, capital campaign agreements, etc. The DO should not get overly prescriptive about what form these might take, nor should it add another reporting requirement or paperwork exercise for our partners.

Page 11 - Line 357 - I'd suggest insuring that the partnership council is highly field oriented by including several superintendents among the 12 members (perhaps half of the members could be superintendents). While the DO does not mandate a specific split between the referenced positions, having a substantial number of superintendents on the council will assist with communication and insure that the regions and WASO are better aware of the issues the field is facing.

Page 13 - Line 436 - Suggest allowing parks to use funds to pay permanent salaries for projects beyond capital improvement projects. Why would we administratively restrict this to only capital improvement? For an agency that is trying to reduce its

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

footprint this doesn't seem to make sense. It has become very difficult for parks - especially those with large partnership programs such as Acadia - to recruit well qualified candidates and retain positions that are less than permanent full time. Partners and donors have an expectation that their funds will be used to pay for highly professional staff to manage projects - which means a permanent full time employee. Other worthwhile staffing priorities should be considered - such as for addressing deferred maintenance, science and resource management work, or for visitor services.

Page 17- line 575 - Suggest authorizing local friends group to be able to accept the donated funds through the checkout counter program. Visitors are more likely to support giving, whether it is entrance fees or donations, when they know the money is staying locally - including being managed locally. NPF for years has not wanted to hold multiple small accounts. Using a local friends group where one exists will be more efficient for the parks, and local friends groups may elect to not take an administrative service fee, ultimately providing more funds to the park.

Page 18 - line 649 - We support the provision to allow partnering with alcohol related businesses.

Page 23 - line 833 - Strategic fundraising partners should not have term of their fundraising agreements limited to 1 year. These organizations often operate on park facilities as referenced elsewhere in the DO. They usually are 501(c)(3) non-profits organizations and as such they are continuously in fundraising mode. The current draft allows a 1-year agreement, renewable up to 3 years. The term of these agreements need to be the same as the terms authorized for under section 6.2 for philanthropic agreements, otherwise we will be constantly rewriting these agreements. While I understand the difference between strategic fundraising partner vs a more traditional friends group, it is unclear to me what advantage is served by creating this separate administrative category for them.

Page 32 - line 1176: We support the change in policy of allowing naming of rooms and interior spaces for donor recognition. However, limiting the naming period to 5 years may not be appropriate. Once a new facility is named, it may be difficult to re-brand under a different name, as the public will have become accustomed to using the name. Naming agreements should be carefully written to insure that the NPS always has final decision making authority for the operations of the facility, so that donor expectations are appropriately managed. Finally, we would propose that authority to name interior spaces up to 5 years be delegated to the regional director level. Naming spaces beyond 5 years may be appropriate in certain circumstances, depending on the size of the gift, and the DO should not limit our authority. As such, the director should have the ability to approve naming interior spaces beyond 5 years.

PEPC Project ID: 60882, DocumentID: 71886
Correspondence: 139

Author Information

Keep Private: No
Name: Travis
Organization: felt soul media
Organization Type: I - Unaffiliated Individual
Address:
Denver, CO 80204
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not cede naming rights to corporations. National Parks need to remain of the people for the people and free of commercial interests.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 140

Author Information

Keep Private: No
Name: S&S Paige
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Tucson, AZ 85719-2641
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

In regards to the proposal to introduce corporate involvement with our National Parks, please resist this "easy way out" of the problem of funding. This is a slippery slope and one that once introduced will be nearly impossible to rescind. We say emphatically, do not take this step.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 141

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Missoula, MT 59802
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not allow private philanthropic sponsorship of public NPS property.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 142

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Eagle River, AK 99577
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Director Jarvis,

I'm disappointed that I heard about the proposed Director's Order #21 Philanthropic Partnerships through a newspaper article four days before the close of the public comment period. Nothing was announced in the Alaska Region, and when I queried colleagues from across the Service, no one had heard of it.

I've worked for the NPS for 16 years and am proud of our agency, but I don't like the direction proposed in this DO. I do not have a problem with the NPS accepting corporate gifts; however, allowing private entities to put their logos/brands inside the boundaries of a park unit crosses the line.

I object to the DO's proposal for donor recognition. Instead, all donor recognition should occur outside the park unit.

Incorporating donor names/logos inside NPS units would be detrimental for many reasons. A little Nike logo on the bottom of an interpretive display is not just a couple extra letters or drops of ink on an NPS sign. It represents something much larger: the elimination of these places as refuges from commercialism, the erosion of national parks as symbols of freedom and democracy, a diminished opportunity for the American people to have meaningful connections to their heritage, and a baby step toward privatization of our most special places.

National parks are our last remaining vestiges of corporate-free America. They are a refuge from the visual and audio bombardment of advertising that is otherwise inescapable in our society. Our parks allow us to interact with a natural environment or historic site in a way that is more pure and honest than most of our daily interactions. Our parks provide sacred settings where we can connect with something larger than ourselves, a higher purpose, or an ideal that we hold dear. Introducing corporate sponsors would desecrate the sacrosanctity of these places.

Our national parks embody freedom and democracy. They are democratic because everyone has equal access to them and because they represent our collective heritage. This DO doesn't change that, but it does inch us closer to a day when corporations own or manage these places and/or a day when the park's highest function is to make a profit, either of which would make them less representative of and accessible to all. The parks are also symbols of freedom. They afford us the freedom to encounter America's treasures in a powerful and intimate way, free from the distractions and stresses of modern society, and free from commercialism telling us we need to buy, do, or consume something. Introducing corporate branding inside the park units will hinder our ability to connect freely, openly, and deeply with these places.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

The DO has not accounted for the psychological impact of seeing logos/brand names. Corporations and for-profit organizations have a primary goal of making money. They do this by creating, advertising, and selling a product. Advertising focuses on convincing people that they are not good enough (or substitute any of the following: cool enough, tough enough, good-looking enough, fun enough, etc.) unless they have the product being sold. We are bombarded with hundreds of advertising logos, slogans, pitches every day telling us we would be better off if we bought such and such product. The psychological toll this has taken on the American population is enormous. We have been brainwashed into believing that we aren't good enough. Our national parks exist to remind us that we are. The park and what we bring to it is enough. Commercial-free parks are a powerful psychological salve that we desperately need.

To call the DO "philanthropy" is a misnomer. If we're really talking about philanthropic gifts, that is, gifts for humanitarian purposes, the donor would not need to benefit financially. Accept gifts, write them a thank you note, and let them know there are no strings attached. That is the appropriate way to accept a philanthropic gift. NPS should not feel any sense of obligation to incorporate their name, logo, etc. in the park unit. Period. To do otherwise is to peddle our prized resources for pennies. Section 8.5.1 Considerations states, "The manner of recognition should not compete for attention with, or draw attention away from, the park's purpose." NPS leadership must acknowledge that the primary purpose of a logo is to draw attention to it. This is why the logo was developed: to catch people's attention, make an association with a product, and get people to buy it. By definition, any logo or brand name will draw attention away from the park's purpose, since no park's purpose is to sell a can of Coke, or a pair of shoes, or a new car. The DO tries hard to suggest that the two can go hand in hand. That is not the case.

The proposed changes in the DO are baby steps. They allow logos (not long descriptions) in limited circumstances. They allow naming, but only temporarily. They allow us to accept sponsorship from corporations that sell alcohol, coal, and oil, but not from companies that sell drones. Yet.

Cracking open this door will undoubtedly lead to a wider opening. And given the national dialogue and interest among conservatives to privatize the parks (even introducing legislation to do so), the NPS is extending its hand in that direction. This is a dangerous path to start down. I hope NPS leadership reconsiders its current proposal and recognizes that the strategy set forth in this DO will begin the slow sell out of America's national treasures and best idea.

Thank you,

Adrienne
Eagle River, AK 99577

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 143

Author Information

Keep Private: No
Name: Walter
Organization:
Organization Type: I - Unaffiliated Individual
Address:
San Antonio, TX 78209
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As a longtime user of national parks, I am dismayed at the possibility of corporate sponsorship of NPS properties (DO-21, Sec. 6.2.4 beginning at line 835). In effect the proposed amended directive permits corporate branding, similar to the branding of major league sports facilities. This is a bad idea for several reasons:

- 1) Tobacco is not the only association to be avoided by NPS. Our kids don't need to see a Budweiser sign as the family car passes through the entrance to Yosemite or when they visit park headquarters.
- 2) Corporate branding perpetuates the notion that Congress shouldn't have to fully fund NPS. I can just hear the Congressional representatives from a certain political party at the NPS budget committee hearing: "Why can't you just get more corporate donations?" National Parks are part of the Commons, the public spaces and infrastructure which we provide ourselves through our government. What's next - the AT&T bridge? the Miller Light freeway?
- 3) For most people, corporate branding is too close conceptually to privatization. The two ideas will most certainly be linked by people in certain political quarters who disagree with the very idea of the Commons and who want to privatize everything. This notion is not just a fringe idea that could never happen; it's being promoted by the Koch Brothers' nationwide network of 64 "think tanks" which do nothing but generate op-eds opposing public financing of almost everything, including public higher education. DO-21 is an incremental capitulation to the privatization forces that are playing a very long and very destructive game.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 144

Author Information

Keep Private: No
Name: Carolyn
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Asheville, NC 28803
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
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May 10, 2016

Jonathan B. Jarvis
Director, National Park Service
1849 C Street NW
Washington DC 20240

Dear Director Jarvis,

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Since our inception in 1997, the Blue Ridge Parkway Foundation (BRPF) has served as the primary philanthropic partner of the Blue Ridge Parkway, contributing over \$10 million to the Blue Ridge Parkway. This funding has allowed the Blue Ridge Parkway to complete projects and programs that would have otherwise been impossible due to lack of federal funding. In addition, the Foundation operates two programs: the Blue Ridge Music Center, helping to keep the traditions of mountain music alive, and Kids in Parks, engaging a future generation of stewards for the Parkway as well as other parks and public lands across the country.

We would like to thank the National Park Service for its work to update this critical policy governing the operations of philanthropic partners. The last update of DO #21 was in 2008, and we appreciate the efforts of the NPS to bring philanthropic activities in and for parks into the 21st century. Many aspects of the revised DO #21 are positive and should assist in improved communication, clarification of partner roles and responsibilities, and expansion of donor recognition programs within the park. However, we believe other sections of the document would be a setback to the operations of the BRPF and other nonprofit groups, and therefore request revisions.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

The BRPF offers the following comments on the Draft Director's Order #21 outlined as follows:

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The table appears to also be inconsistent with Section 3.1.10 line 313 where it indicates regional directors will "vet proposed donations over \$50,000 and up to \$250,000." If regional directors must vet donations more than \$50,000, it is unclear how a Superintendent has the authority to accept a donation of \$100,000 or less if not certified and up to \$5 million with certification. Further confusing the issue is the reference in Section 5.3.1 line 712 which indicates that donors making direct donations to the park must complete DI 3680. Although it appears this \$25,000 threshold only applies to direct donations to the park, Section 5.4 indicates that "NPS policies govern the vetting of donations made directly and indirectly to the NPS," which implies that the \$25,000 threshold requirement would apply to indirect donations made through the partner. And finally, Section 5, line 625 indicates that "The NPS will review (vet) all proposed donations or gifts, and their circumstances, before acceptance." Are ALL donations vetted, or all over \$25,000 or all over \$50,000; and who will be doing the acceptance versus the vetting; and how do those processes differ?

Regardless of the inconsistencies, the primary concern is that the internal vetting and review process has been stripped from partner groups. We have deep concerns about this on several levels. To remove the spontaneity and immediate context of many large gifts will dramatically impact the bottom line and overall success of fundraising efforts. To delay the acceptance of a gift would surely jeopardize the donation, insult the donor, and hinder a partner's ability to build relationships that benefit the park. Gifts are often made in the moment, when the message resonates, and the meaning is salient. That 'sweet spot' is often fleeting and a delay to be "vetted" ignores many of the basic principles of philanthropy.

In addition, we have grave concerns about releasing the names of our donors. Protection of donor identity and privacy is paramount to success of groups such as ours. What assurance would we have that our donors would not be solicited directly by the NPS since Deputy Directors will now be allowed to solicit? What internal systems would be in place to assure partner groups and donors their information would remain private and protected?

2. A second primary concern is the omission of language regarding the NPS's responsibilities to ensure that donations are expensed in accordance with the partner or donor's wishes. There is also no information as to how the gift will be tracked to account for appropriate expenditure, and processes for reporting back to the partner (or donor) any results made possible from the donation. As a philanthropic partner, our success is the result of donor relationships built over time. At the core of these relationships is trust that their donations will be spent according to their wishes. We work closely with our park partner, the Blue Ridge Parkway, to ensure that the funds are properly assigned, appropriate planning is completed to enable projects to go forward as conveyed to the donor, and reporting processes are in place to formalize that outcomes and updates are communicated to the donor. The omission of any language in DO #21 acknowledging the NPS's responsibilities as the recipient of the donation, the work of the philanthropic partner groups, and efforts to maintain the integrity of the philanthropic process is concerning.

3. A third major area we would like to see addressed in the modifications to DO #21 regards the certification program. Some of the language in DO #21 is unclear and vague, raising more questions than it answers in reference to the training and certification program. For example, it is a positive step to begin to provide training to NPS employees regarding philanthropy as stated in Section 3.1.4. However, it is unclear if the partners will be required to attend the training. In addition, it seems questionable to "require" certification training from a program that does not exist yet. How was the university selected to provide this training? Was it simply because there was an existing cooperative agreement or because they are considered "experts" in philanthropy? Who will determine the curriculum? Given that best practices evolve and change, sometimes

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I applaud the efforts to have partners and the park begin to share the same language regarding philanthropy, but to institute an NPS certification program for development professionals, many of whom have been trained and working more than 30 years in the field is one-sided and insular. There are well-respected certification programs all over the country that have long histories and evidence-based results including the Certified Fund Raising Executive (CFRE) program used by 14 leading philanthropic organizations across the world to state-level programs and organizations. Creating an internal certification for the NPS does not capitalize on the existing programs, body of knowledge and fields of study surrounding philanthropy that already exist. Fund development is a process and a profession. There are ethical principles, standards of process, and entire fields of study and research building a body of knowledge that guide the profession of philanthropy.

I do agree that it would be ideal for park personnel to have a greater understanding of how the field of philanthropy operates, just as it would be beneficial for park partners to understand how internal operations within the park work, but that does not qualify either of us to do the other's job. In addition, I do not think that training should be limited and tied to the authorized NPS employee and the acceptance of donations. It should be provided for all NPS employees that benefit from the work of nonprofit partners practicing the profession. The training would further the mission and success of those groups. Likewise our success would be enhanced if we know more about how decisions are made, how priorities are designated, and how projects are ranked and funded within the park.

4. The fourth major concern we have with the proposed changes to DO #21 is the inclusion of section 6.3 on Intellectual Property. Line 882-883 indicates that "Upon termination of an agreement, all developed intellectual property will be conveyed to the NPS." Since an agreement can be terminated by either party at any time for any reason, this section represents extreme overreach and is potentially illegal. If we have a grantor/funder that provides the funding to start a program we operate, staff and manage, the NPS should not have intellectual property rights to it. It is overreach at best to assert that the NPS should have the rights to the work of others that the NPS did not fund or participate in creating. Perhaps this section is trying to assert that if the partner and the park work on something together and both have intellectual property in the final product, the NPS should retain ownership if the partner dissolves. That might be an understandable position; however, that is not what this section states. If this section remains as it is currently written, the Blue Ridge Parkway Foundation will be forced to take action to protect our intellectual property.

5. An additional major concern is surrounding RM-21. As I understand it, RM-21 is the Reference Manual to Philanthropic Partnerships. This document is referenced 26 times in Director's Order #21. For example, in Section 4 line 409-411 it states, "RM-21 contains more guidance; sections will be updated as needed, to ensure that we and our partners understand evolving trends in fundraising and use best practices to achieve philanthropic goals, maintain transparency, and ensure accountability." However, an updated RM-21 has not been released, and as I understand it, will not be until after the comment period is over. This is not transparent. It is impossible for me to understand or comment on the "Special attention must be paid to the internal control procedures in RM-21 for handling and depositing the funds," or the "Procedures for setting up and operating online direct donation collections are in RM-21," without seeing RM-21. I find it hard to believe that a document referenced 26 times in DO #21 as having the details for all procedures, what definitions really mean, and how donation review and vetting will work is not part of this review process.

6. Another area that is somewhat vague and allows for wide interpretation is in Section 5.1 (line 643). The NPS is directed to decline donations from "sources that would generate controversy or associate the NPS with products that are inconsistent with our mission...." Who will be making the determination of controversy or products inconsistent with the mission? A company that generated controversy in the past will now be allowed but not others. What changed that decision? Will those determinations be made on a case by case basis? On the monetary amount offered? And what standards or protocol will be used moving forward? Do those exist?

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In conclusion, we are grateful for the hard work and dedication of the National Park Service in completing the update to DO #21 and recognize that there are many positive additions to this version. The absolute success of philanthropy is built on trust, transparency, follow-up and follow-through. It is a long-term relationship developed and cultivated over time. Our core work is to build that positive relationship with our donors. They trust that we will steward their gifts according to their wishes, account for the spending appropriately and accurately report the results from their support. Giving is an emotional act not a financial transaction, and much of DO #21 relegates it to a simple financial transaction.

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We offer these comments and suggestions with the hope that the Draft Director's Order #21 Philanthropic Partnerships will be revised to reflect a mutual level of trust and respect of our respective roles.

If you have any questions, please contact CEO, Carolyn Ward at 828-776-4547 or cward@brpfoundation.org or Board Chair, Jack Betts at jbetts@mindspring.com.

Sincerely,

Carolyn, Jack
Blue Ridge Parkway Foundation Board of Trustees

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 145

Author Information

Keep Private: No
Name: Carolyn
Organization: Blue Ridge Parkway Foundation
Organization Type: I - Unaffiliated Individual
Address:
Asheville, NC 28803
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
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Correspondence Text

May 10, 2016

Jonathan B. Jarvis
Director, National Park Service
1849 C Street NW
Washington DC 20240

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Sincerely,

Carolyn, Jack
Blue Ridge Parkway Foundation Board of Trustees

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 146

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Gunnison, CO 81230
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/13/2016	Date Received: 05/13/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

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PEPC Project ID: 60882, DocumentID: 71886
Correspondence: 147

Author Information

Keep Private: No
Name: david
Organization: Mr.
Organization Type: I - Unaffiliated Individual
Address:

erie, PA 16514
USA

E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/13/2016	Date Received: 05/13/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Keep comercial entities out of our National Parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 148

Author Information

Keep Private: No
Name: Gary
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Santa Fe, NM 87505
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Allowing corporate ads into our National Parks is a terrible idea. Americans value their parks because they provide small respite from the incessant commercialism of modern life, and a window to reconnect with the wild. I appreciate that the park system is probably under-funded and needs revenue. But how about requiring that corporations support the parks the way average citizens do, with their taxes? Twenty percent of Fortune 500 companies last year paid no federal taxes.

The park service enjoys huge popularity. You risk tarnishing your own brand by allowing it to be co-opted by Starbucks, Verizon, McDonalds and the other businesses who do not enjoy such public esteem. What you lose in this bargain is literally priceless.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 149

Author Information

Keep Private: No
Name: N/A N/A
Organization: Cuyahoga Valley National Park
Organization Type: I - Unaffiliated Individual
Address: Brecksville, OH 44141
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Page # Line # Section

6 152 - 153 Authorized Employees

The definition of Authorized Employees doesn't specify which employees might achieve this designation. However, the table on page 7 (line 209) specifically names which employees are eligible to be "Authorized Employees".

7 211 - 217 Philanthropic Competencies and Skills

The lowest level of "Authorized Employee" (per the table in line 209) is the Superintendent. It will be beneficial for some parks to have other staff trained in philanthropic core competencies so there is continuity/understanding of the issues, during periods when there is an acting Superintendent or when a sitting Superintendent has not gone through the training yet. The RD could make the determination, based on the same criteria for increasing superintendent's donation acceptance and agreements approval value thresholds.

10 313 Regional Directors

The vetting level of \$50K - \$250K for RDs doesn't comport with the Donation Acceptance and Agreements Approval level for Superintendents (Up to \$5M) shown in the table in Line 209. In addition, there is no mention of the time it will take for vetting to occur at the RD level... one week, one month, other? Systems will need to be in place at the Regional level for the timely review of all donations at the required level (which seems too low).

10 336 - 337 Superintendents

Same as above. Also, we suggest adding a column to the table in Line 209 to show vetting levels.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

10 333 - 335 Superintendents

"Required Annual Work Plans" is a good addition to the DO.

12 and others 407 - 408 and others Philanthropic Support

The following comment applies to various sections throughout the DO. DO-21 is a policy document for NPS employees. However, there are times when the document directs the activity of a partner. It is difficult to know at any point in the document if the audience is NPS only or NPS and partner. Because the document is 33 pages long, it gets confusing to whom the guidance is being directed. For an example, line 407-408 says "All" donations, but lines 738-739 and 740 - 741 contradict this.

14 489 - 495 Cause-Related Marketing

This section is silent about a cause-related marketing campaign at a local level (who approves and is there a dollar threshold?)

15 527 In-Park Fundraising

Typo - should be 4.6.3 not 4.6.2

Multiple

Be consistent throughout the document about references to RM-21. Sometimes references are in the present tense, sometimes they are in the future tense.

18 623 - 624 Donor review

This says NPS will review (vet) "all" proposed donations. However, the vetting thresholds indicate \$50K on the low end, which would imply that donations between \$1 and \$50K do not need to be vetted. Please clarify.

20 726 - 730 Exceptions

This section does not say by whom these types of donations will be "evaluated" and if there are thresholds for this type of "evaluation".

22 796 - 812 Philanthropic Agreements

Who determines the designation for the type of partner? Superintendent, RD, Partnership Office?

23 818 - 821 Philanthropic Agreements

With "small-scale" being capped at \$25K, it leaves donations between \$25K - \$50K in an ambiguous/undefined category when it comes to vetting. The cap for small-scale should be \$50K for consistency.

25 898, 904, 955 - 956.4 NPS Brand Management and Logo Licensing/6.5 Sponsorships

Line 898 and 904 are unclear about who the "NPS" is? However, lines 955 - 956 say: "All requests to use NPS marks and logos must be approved by the Office of Partnerships and Philanthropy." This seems like a tremendous workload for this WASO level Office.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

25 950 - 951 Sponsorships

Recognizing sponsors in the same way that donors are recognized (per the language and levels delineated in a donor recognition plan) is a new concept. Sponsor recognition usually occurs at the event.

25 952 Sponsorships

This is the first mention of "vetting" sponsorships. What does "design and vet sponsorships" mean? There is no information about what is required and by whom regarding sponsorship vetting.

31 1120 - 1121 Considerations

This requirement is too prescriptive; sometimes a freestanding donor recognition device may be more intrusive than one carefully attached to historic fabric. Recommend requiring CRM specialist input, review and approval of design.

31 1124 - 1125 Considerations

This should say "Superintendents and their partners must ensure that funds are available for this purpose."

31 1153 - 1165 Suggestions for in-park recognition

Are the decisions associated with this section at the park level?

32 1168 and 1178 Suggestions for in-park recognition

The approval for these things should be commensurate with the Donation Acceptance and Agreements Approval levels shown in the table in Line 209, not at the Director level.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 150

Author Information

Keep Private: No
Name: Thomas
Organization: National Park Service, Midwest Regional Office
Organization Type: I - Unaffiliated Individual
Address:
Omaha, NE 68102
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Page 3, Line 54: Please change "educational, scientific, historical, and interpretive activities..." to "interpretation, education, and research activities." Use of "research" would broaden this definition to include support for social science research about park audiences and their expectations.

Page 5, Lines 142-143: Please include the NPS Director and Deputy Directors in the prohibition of soliciting donations. Such solicitations by senior NPS leadership will damage the agency's public image of integrity. Why should senior leadership be under a different standard of ethics?

Page 8, Lines 254-255: Please drop this apparent approval of donations by any group in litigation with the Department of Interior or its agencies. Again, the integrity of the NPS will be harmed by such approvals.

Page 11, Lines 344-347: Permitting Superintendents to participate in direct solicitation of funds will damage the public integrity of our agency regardless of the use such semantics as "subject-matter experts

Page 12, Line 411: Please change "...maintain transparency, and ensure accountability" to "...maintain transparency, ensure accountability, and preserve the public integrity of the agency."

Page 14, Lines 454-455: Please add a prohibition on accepting funds from any donor associated with the manufacture or sale of alcohol. For some people, alcohol can become a dangerously addictive substance.

Page 14, Lines 458-459: Please strengthen to prohibit any donation that gives a public perception of commercialization of the agency.

Page 15, Line 526: Please restrict solicitation through park websites, brochures, and in-park donation boxes to only the National Park Foundation, park friends groups, and park cooperating associations. To open up this opportunity to any

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

corporation or other fundraising group will seriously undermine park friends groups and cooperating associations.

Page 15, Lines 531-534: Please add that the NPS will not share information about visitors gleaned from their purchase of any park pass.

Page 15, Lines 541-550: Please add a restriction of park activities and special events conducted by fundraising groups may only take place in area of a park generally accessible to the public. This will limit public perception that parks are giving special privileges to fundraising groups and potential donors. For example, the NPS should not permit a past practice at Mount Rushmore National Memorial of permitting fundraising activities and special events for potential donors in the restricted area at the top of the carvings.

Page 16, Line 551: Please change "Park superintendents may permit cooperating associations to collect donations in park bookstores" to "Park superintendents my permit cooperating associations to collect donations in their park stores. Donation boxes and other solicitation must identify if donations will directly support the park, or indirectly support the park through the business operations of the cooperating association." Because cooperating associations have expanded their sales lines far beyond books, please change "in their park bookstores" to "...in their park stores."

Page 16, Lines 555-558: Permitting park donation boxes for any philanthropic partner will seriously undermine the potential for the National Park Foundation and park friends group from earning revenue through their own donation boxes. Permitting an array of donation boxes within a park will encourage public perception of commercialization and influence peddling.

Page 17, Lines 572-589: The designation of the National Park Foundation as the agency for collecting checkout counter donations seems unfair to cooperating associations and concessioners who would prefer to operate their own checkout counter donation program without involving the National Park Foundation.

Page 17, Lines 591-605: The presence of multiple electronic solicitations on a park's website will convey a commercial tone to the website and damage the public's perception of our agency's integrity. Please restrict such solicitations on a park website to only the National Park Foundation, a park's friends group, and a park's cooperating associations. Please permit park websites to have links to other websites operated by authorized philanthropic organizations conducting electronic solicitations on behalf of a park.

Page 18, Line 634: Please change "Prevent financial liability" to "Prevent financial liability or determine that the philanthropic partner will establish a park operations and maintenance endowment at an acceptable level to cover added costs incurred by a park to operate and maintain facilities constructed as the result of a donation.

Page 18, Line 642: Please add a prohibition on sources that would identify the agency or a park to the commercial production, distribution, or sale of alcohol. Alcohol can become a dangerously addiction for many people. Permitting these sources would damage the public perception of the agency.

Page 18, Lines 648-650: Please eliminate this permission for sources that would identify the agency or a park with the production, distribution, and sale of alcohol for the same reasons in the previous comment (Page 18, Line 642).

Page 19: Lines 665-666: Please add a requirement that philanthropic partners will establish a park operations and maintenance endowment at an acceptable level to cover added costs incurred by a park to operate and maintain facilities constructed as the result of a donation.

Page 21, Lines 742-750: Please continue the present practice of declining gifts from any donor involved in litigation with the Department or its bureaus. Loosening this standard will decrease public confidence in the integrity of the agency.

Page 22, Footnote #5: Please add "Western National Parks Association" to this list of examples of Strategic Philanthropic Partners.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Page 27, Lines 966-969: Please add a statement that the agency or park will not permit a partner to take part in the final review and approval of construction projects.

Page 27, Lines 985, 991: Please add a requirement that philanthropic partners establish an endowment fund to support park operations and maintenance of assets involved in their donation of funds to support Partnership Construction projects. This will ensure the financial sustainability of these projects.

Page 30, Lines 1107-1108: Please add that the NPS Web Council will establish guidelines for placement of donor walls in agency digital interpretation that will not clutter park websites and will not distract users from the intended purpose of the websites.

Page 30, Line 1116: Please include donor recognition on wayside exhibits as an exception to restricting donor recognition to visitor centers and other developed areas.

Page 31, Lines 1136-1138: Please eliminate donor recognition in interpretive programs. This would add a commercial tone to such programs that would damage the agency's reputation, integrity, and confidence with the public. Such a requirement also would disrupt the flow and impact of interpretive programs.

Page 33, Lines 1226-1229: Please add a restriction on the location of authorized philanthropic partner events to only park areas generally open to the public. Please add a prohibition on holding such events in park areas closed to the public. This will dispel the potential image of the agency trading special privileges to a donor in return for a donation.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 151

Author Information

Keep Private: No
Name: Jaime
Organization: www.theSCA.org
Organization Type: I - Unaffiliated Individual
Address:
Arlington, VA 22203
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Director Jarvis,

Thank you for this opportunity to comment on the draft Director's Order #21. The Student Conservation Association sincerely appreciates being listed as an example of a "Strategic Philanthropic Partner" in the draft Director's Order #21: Philanthropic Partnerships. The Student Conservation Association raises corporate and private funding to support our diverse range of programming to meet our mission to build the next generation of conservation leaders. We look forward to the possibility of joint fundraising together to meet shared goals and mission. We request that you revise the term of agreements for Strategic Philanthropic Partners to multiple-year agreements. We feel that the fundraising process is a multi-year public private partnership and because of this we request multiple-year agreements for Strategic Philanthropic Partners.

As the National Park Service approaches its 100th anniversary, the agency's priorities of engaging youth in nature, reaching into under-served audiences, and creating new professional pathways wholly align with SCA's strengths. We look forward to supporting the National Park Service as it embarks on a second century of stewardship.

Thank you,

Jaime
President and Chief Executive Officer

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 152

Author Information

Keep Private: No
Name: Mark
Organization: Sequoia Parks Conservancy
Organization Type: I - Unaffiliated Individual
Address:
Three Rivers, CA 93271
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for the opportunity to comment on the proposed Directors Orders #21. The Sequoia Parks Conservancy partners with the NPS in Sequoia and Kings Canyon national parks and Devils Postpile National Monument. We have been a cooperating association since 1940 and now also serve as a friends group. The Sequoia Parks Conservancy has also signed the response letter from the Public Lands Alliance.

On behalf of the board of directors of the Sequoia Parks Conservancy we applaud the NPS in recognizing the importance of partnerships in philanthropy and in expanding the ability of non-profit partners to play a stronger role in fundraising. While the board of directors agrees with the value of opening new doors, and appreciates the NPS efforts to do so, there are areas in which the draft DO#21 will inhibit our efforts to fundraise in support of our park partner. We operate on a tight budget and additional expenses or paperwork can reduce our return on investment to the point we might not undertake otherwise profitable endeavors.

" The draft DO#21 cannot be a one-size fits all. While it is reasonable for NPS to want additional controls on an inexperienced partner, many partners have been doing this for a long time and already demonstrate the needed expertise.

" Experienced partners require less oversight, know their donors, and should not have to filter funds through the National Park Foundation.

" Line 217 - 221: Partners should be trained in properly executing DO#21, but non-profits that already conduct substantial fundraising efforts have development staff and board members with considerable experience in fundraising.

" Line 409 - 410 and Line 429 - 431: It is impossible for NPS to vet every partner donation. We receive thousands of donations; many are small and received through our website.

" Line 556 - 559: We previously maintained donation boxes in areas that our organization operated programs and would not be feasible for NPS to maintain. When it was time to replace these boxes with ones that met the stringent NPS requirements, we did not have the funds to do so and since we could not recoup our cost the boxes were removed, with an annual loss of unearned income to the parks of \$1,000/year.

" Lines 575 - 592: In addition to the unknown cut taken by NPF, moving money around is an administrative nightmare. The

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

checkout counter program alone will generate an estimated \$35,000 to \$50,000 annually.

" When a visitor is asked for a donation to help the park in the visitor center, the visitor should assume that money goes to help that park, not to administrative expenses or another organization.

" Lines 698 - 713: It is impossible for NPS to vet every donor. It is not necessary to re-vet a donor annually who is a long-time supporter of the non-profit partner and the donors background is well-known.

" Lines 795 - 797: While we maintain a close relationship with our NPS partner, they do not have the staff and means to control everything we do. As a partner with NPS for more than 75 years, our partners have come to trust our ability and sense of good judgement.

Left as-is, Directors Order #21 would require we hire a full time employee just to administer the many requirements. When a donor makes a gift, they should feel confident that the entire gift is helping their cause, not going to administrative costs. As a cooperating association that generates sufficient income to pay most of our operating expenses from retail sales and programs, we are able to say that in many cases, 100% of a donation goes to a park program or project, not to overhead.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 153

Author Information

Keep Private: No
Name: Joy
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Morro Bay, CA 93442
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I urge that this plan be rejected, for many reasons. Firstly, it is a misuse of taxpayer funds to have government employees working to establish partnerships with donors that will benefit private corporations. Secondly, allowing corporate donors into partnerships with such benefits as described will allow private corporations to influence policy in any National Park they donate to, rather than leaving policy to the National Park Service and the public, via the government. Thirdly, any fundraising from private donors to benefit the National Parks should be done by the National Park Foundation, which exists specifically for that purpose, and not the National Park Service itself, as having NPS employees raise funds while working distracts from their primary duties. Lastly, I urge that this plan be rejected because the National Parks belong to all Americans, and the fate of the Parks should not be subject to the whims of private donors; neither should any private corporations be allowed to profit from the use of these public lands, as would be the case if this plan is adopted. The National Parks belong to all the citizens of the United States, and as such they should be paid for by taxes and fully funded by Congress in the federal budget. This would be ideal, but as this is often not the case, I suggest that any fundraising be done by the National Park Foundation, and that any corporate donors not be given the rewards proposed in this plan. Donations should be freely given, rewarded by the future enjoyment of the Parks, rather than an advance payment in expectation of future private perks and influence. If corporate donors must be rewarded for their charity in more tangible ways, let the reward be tax deductions and a perhaps a small recognition of the donation by the Park Service, as is the case for many donations from private individuals.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 154

Author Information

Keep Private: No
Name: Nicholas N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Munster, IN 46321
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

It's somewhat disturbing that the NPS has been so underfunded that it can be driven to sing and dance for corporate partnerships. Businesses and industry were what were encroaching on many areas that became protected by the Park system, so it is somewhat unnerving to see partnerships with them instead of keeping the system publicly funded. I'm sure John Muir would've marched into Congress to try and secure adequate funding instead of looking for donations.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 155

Author Information

Keep Private: No
Name: John
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kitty Hawk, NC 27949
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am apposed to the commercialization of our National Parks, through any type of advertising campaigns. I served 35 years in the federal service 20 with the Park Service and know there many other means for funding and preserving our Park land.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 156

Author Information

Keep Private: No
Name: Kate
Organization:
Organization Type: I - Unaffiliated Individual
Address:

Crested Butte, CO 81224
USA

E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/13/2016	Date Received: 05/13/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Dear Director,

Although I am acutely aware of the funding shortfalls in the National Park Service funding, I remain acutely wary of plans that would lead to commercialization of our National Parks.

Accepting donations and acknowledgement by small discrete signs I can tolerate if truly necessary. However, allowing large advertising signage or branded shopping defeats that which is most wonderful about being in a National Park.

I have just returned from spending several days in Canyonland NP in Utah. It was so wonderfully low-key; telephones and iPads did not work (hooray), not even a restaurant, so we camped and did our own cooking, and we hiked the fabulous country with a few other very happy people. When people know they must take care of their own needs in order to experience a fabulous natural place, they will plan accordingly.

Please, PLEASE, do not allow the National Parks to become like other commercial nature establishments in the USA.

Sincerely,

Kate

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 157

Author Information

Keep Private: No
Name: Dustin
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Crested Butte, CO 81224
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I disagree with the corporate sponsorship of National and State Parks. This is a short-sighted attempt to fix a problem that needs a more radical approach. The implications of the passage of this policy will be far-reaching and beyond the grasp of politicians, businessman, and National Park employees and operators.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 158

Author Information

Keep Private: No
Name: AV V
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Crested Butte, CO 81224
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Sir/Madam

Opening the NP System to corporate sponsors is a very bad idea. Expecting, or worse requiring, park officials to raise money from commercial advertisers raises immense concerns about conflict of interest for park supervisors. This is equally true for the leadership of the NPS regionally and nationally.

If commercial interests (corporations/businesses) are primarily interested in helping the NPS in its historical mandate to 'preserve for the people' the parks and monuments they can donate to the NPS just as individual supporters can. However if such commercial interests are not donating but are "helping" the NPS by using the parks as advertising forums then their true purpose is evident: I.e. Use the parks to make money.

If corporate 'sponsorship' of parks and monuments is allowed then this will simply be another reason for the Congress to continue and increase its underfunding of the NPS.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 159

Author Information

Keep Private: No
Name: Lea
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Santa Fe, NM 87501
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/13/2016 Date Received: 05/13/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not turn our national parks into a commercial nightmare! The parks are a national treasure, loved and used by millions of Americans who appreciate the outdoors, many of whom escape the noise and pollution of urban centers in which they live. The grandeur and awesomeness of their unique beauty is an inspiration to us all, a chance to rejuvenate and restore our sanity. Please do not desecrate our beautiful monuments by selling them to the highest bidder. It will be a travesty to be at the mercy of corporate donors whose contribution will come with strings attached. Save the parks for the people of America and for the many visitors who are attracted to what is the best that America can offer.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 160

Author Information

Keep Private: No
Name: Natalie
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Muscodia, WI 53573
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please take a moment to reconsider this "notion" of allowing corporate sponsorship of our National park systems of ANY KIND!!!! Once they have an 'in' they will only continue to press forward until we have Budweiser National Park! It is absolutely abhorrent that our park system would allow some of the most beautiful places in the country to fall victim to the corporate machine. There are other ways of finding the means to make up the difference that does NOT involve hunting on federal lands or corporate investment. Why don't you utilize some creative thinking and find better, long-lasting solutions rather than quick, easy fixes that will lead to more trouble for future generations. Please don't turn to greed like the Republican Party has.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 161

Author Information

Keep Private: No
Name: Maria
Organization: Retired Psychiatric Social Worker, NASW, AARP, Panama Canal Society, OWL
Organization Type: I - Unaffiliated Individual
Address: Lawrence, KS 66049
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/14/2016	Date Received: 05/14/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

I retired after nearly 40 years in Mental Health with a tour of the National Parks and monuments as my goal. I would not want to see any commercial advertising posted in or around the parks. That would be an abomination. Teddy Roosevelt and those seeking refuge from our increasingly commercial and polluted world would be devastated. I have seen the country where I was raised defaced by signs and advertising, especially along the Pan American Highway. Fortunately, Panama's parks are still pristine. I would hope that would be the case in the US. Thank you, The Sister of a retired Park Service Worker.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 162

Author Information

Keep Private: No
Name: Maria
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Santa Fe, NM 87501
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am alarmed at the thought of selling the country's national parks to corporate sponsors. Please prevent the use of corporate logos in our national parks. Thank you!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 163

Author Information

Keep Private: No
Name: Jaime
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Biddeford, ME 04007
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I was born in Bar Harbor. I consider Acadia my first home. I love my native island so much it is near and dear to my heart. I visit "home" often and when I visit Acadia I go there to get away from everything, to just be with nature and enjoy my time there. I strongly feel that philanthropic partnerships between the park and major corporations will ruin the experience of visiting Acadia National park. The last thing I want to see when I visit there is name brands and names of major corporations on any signs, or anything in the park. I strongly feel this will negatively impact the park in ways that will forever change it. There has to be a better way. Please don't do this!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 164

Author Information

Keep Private: No
Name: Stephanie
Organization:
Organization Type: I - Unaffiliated Individual
Address:
New Milford, CT 06776
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I do not believe our public lands should be privatized. Why should the wealthy have control over what is now owned by all of us? I enjoy Acadia National Park. My family has been going there for years. We hike, have gone to the ranger programs and just enjoyed it in general. These vacations of ours cost relatively little money so our small, lower middle class family was able to go on vacation without going in debt. If these lands, and others like it, were to be privatized I can only imagine they would be turned into expensive, commercialized resorts. Please leave the public lands the way they are. If anything I would like more land to become public land so that future generations may enjoy all this great country has to offer and not go broke doing it.

Thank you,
Stephanie

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 165

Author Information

Keep Private: No
Name: Peggy
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Charlottesville, VA 22902
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

PLEASE, PLEASE, PLEASE!!! Do not privatize our National Parks! Please preserve them for all posterity as these are the last of our natural beauty maintained for all generations. By privatizing, the parks as we know them now will cease to exist. Congress needs to fund these parks & manage them so that the private sector won't destroy them in the future. The US government needs to continue to preserve & maintain the parks at all cost. Fund the parks! Keep them beautiful & protected!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 166

Author Information

Keep Private: No
Name: Mark N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Mont Clare, PA 19453
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please Fund our National Parks and please do NOT allow corporate sponsorship. That is a slippery slope that will lead to corporations feeling that they will own the land and have the rights to it. They will eventually insist with their influence and d then there will come a time when they will get to decide who gets to visit the National Parks.

Please keep corporations out of our National Parks.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 167

Author Information

Keep Private: No
Name: Bobbie-Jo
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Richmond Hill, GA 31324
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not commercialize our National Treasures! I've enjoyed visiting National parks my whole life and now take my children to as many as we can. We have visited many over the years. National Parks represent all that is good and natural in the world. If you allow them to become commercialized we will lose that.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 168

Author Information

Keep Private: No
Name: DAVID
Organization:
Organization Type: I - Unaffiliated Individual
Address:
HAMPTON, VA 23669
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I applaud your efforts to seek additional resources for our national parks, I would encourage you though to not give naming rights away. We are already seeing what kind of issues this caused at Yosemite with the food service vendor copywriting treasured names and now the park service is having to change them. There are other ways to recognize corporate donors and sponsorships instead of giving away naming rights for our treasured resources.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 169

Author Information

Keep Private: No
Name: Denton
Organization: Self
Organization Type: I - Unaffiliated Individual
Address:
Sitka, AK 99835
Sitka, AK 99835
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The National Parks are one of our few successful "joint enterprises" as a nation. Selling naming rights (or other commercial use of park resources) would detract from the sanctity of our parks. They are "our" parks, not the parks of commercial enterprise. Let's emblazon Air Force jets with commercial logos (like NASCAR racers) before debasing the park experience with crass commercialism.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 170

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
New Milford, CT 06776
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/14/2016	Date Received: 05/14/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

What does the word National Parks mean to you and whose bright idea is to commercialize our parks so Corporations can own them.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 171

Author Information

Keep Private: No
Name: Elizabeth
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Blue Hill, ME 04614
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The odds are not in favor of this going well if put into practice. There are only a handful of companies who opt to do the socially, morally and environmentally right thing when loss of profits are on the line. We need to make national parks a priority. Once we damage them it will take considerable effort in terms of time and money that we (government bodies) classically opt not to do. Please don't make this a reality!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 172

Author Information

Keep Private: No
Name: Nancy
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fresno, CA 93721
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I feel strongly that the use of corporate logos, even if discrete, should be prohibited in our national parks. I seek out national parks, especially those with wilderness areas, to leave behind the politics and obtrusive racket of advertising that constantly bombards our daily lives. Seeing these logos, which are in themselves a form of advertising, at trailheads (on bear boxes or trail signs, for example) or plastered all over park vehicles would eliminate any possibility of getting a break from this commercial onslaught.

I understand that our national parks are underfunded, but I believe that adequate tax dollars would be available for the maintenance and preservation of national treasures were they not siphoned away to other projects by short-sighted elected officials, many of whom are on the take from and returning favors to the same corporations who might wish to have a presence in our national parks. The parks in my region are enormously popular, generating millions in admission fees annually. Surely Congress can find a responsible way to use these and other taxpayer funds to ensure that our precious parks are not falling into neglect and disrepair or becoming inaccessible due to understaffing or problems with facilities.

Yet even if the need for corporate assistance with financial shortfalls in our parks is real, must we reward corporations by displaying their logos? Wouldn't a simple text attribution be acceptable? It has long been adequate for citizen donors, whose contributions are surely no less valuable and are often made out of a devotion to and love for the parks, not just as a way to get name recognition.

Corporations who want to support national parks financially should do so out of an interest in preserving our national heritage and precious natural areas, not because it provides opportunities to get their logos in front of consumers. Corporations can promote their philanthropy on their own websites and via social and commercial media outside of the parks themselves. They simply do not need visibility inside the boundaries of these special and protected areas, which belong to the people. Corporations should not be granted intrusive access to pursue us even in remote and hallowed areas that provide respite and peace and an escape from the tiresome presence of advertisements.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 173

Author Information

Keep Private: No
Name: Barbara
Organization:
Organization Type: I - Unaffiliated Individual
Address:
North chesterfield , VA 23235
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Congress must support our National Parks and their must remain free from commercializations!! These parks are the best of Americas nature and natural landscapes! Somethings must remain sacred and preserved.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 174

Author Information

Keep Private: No
Name: Elizabeth
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Scotia, CA 95565
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not privatize the National Parks! They will be destroyed if you privatize them! If you sell or lease them they will be restricted so that only some of the people will be allowed or be able to afford to go visit them. The National Parks are for everyone and should remain open and accessible for all people!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 175

Author Information

Keep Private: No
Name: gina m. giansante
Organization:
Organization Type: I - Unaffiliated Individual
Address:
hollidaysburg, PA 16648
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/14/2016	Date Received: 05/14/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Do not commercialize our national parks. Corporations should definitely not have naming rights. use my tax dollars to fully fund our national parks, they are a rare gem of beauty and history.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 176

Author Information

Keep Private: No
Name: gina
Organization:
Organization Type: I - Unaffiliated Individual
Address:
hollidaysburg, PA 16648
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/14/2016	Date Received: 05/14/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Do not commercialize our national parks. Corporations should definitely not have naming rights. use my tax dollars to fully fund our national parks, they are a rare gem of beauty and history.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 177

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bangor, ME 04401
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am strongly opposed to "naming rights" of any corporation or business to sully the natural beauty of Acadia. It was not that long ago Maine passed the billboard sign law to prevent the landscape of our state to be littered. This would be in direct opposition to the traditional values of Maine.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 178

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Eden Prairie, MN 55344
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I understand the NPS is underfunded, but it's a slippery slope allowing corporate sponsorships of the parks. Logos are going to be everywhere and will NEVER go away.

Corporate logos on bear boxes? "Allowing" corporate donors to design, build and operate facilities long-term?

Have we learned nothing from the early days of Yosemite and Yellowstone?!? It was a disaster!

This proposal is piece-meal and relies on a corporation's profitability and desire to contribute to the NPS. There may be no consistency to any funding that this may raise. And, what if fortunes turn and a corporate desire to contribute wanes and the NPS is left with facilities that it can't afford to run itself?

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 179

Author Information

Keep Private: No
Name: Deidre
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Crested Butte, CO 81224
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for the opportunity to comment on the proposed replacement of Director's Order #21: Donations and Fundraising, dated July 11, 2008.

I am against the proposed replacement order. The In-Park Recognition program will effectively allow for-profit corporations to use the NPS as an advertising venue. The proposal will award advertising space at events, in printed materials, on digital media, and on NPS vehicles to the highest "philanthropic" bidder.

Allowing for-profit corporations to advertise in the parks is a conflict of interest with the NPS's mission to "preserve unimpaired the natural and cultural resources and values of the national park system." Advertising within the parks is an impairment to the park experience, especially for the next generation of park visitors. I believe that young visitors' experiences will be shaped by the advertising they see. We need to preserve the parks' natural, cultural experiences, "unimpaired"; especially for young visitors.

The proposal to allow Authorized Employees to "accept donations and approve agreements" is a conflict of interest between the NPS' policy makers and profit-motivated corporations. Policy decisions made by Directors and Superintendents who are under pressure to fundraise could be influenced by high-value donors. The results for the NPS would be detrimental when those high-value donors are profit-motivated corporations.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 180

Author Information

Keep Private: No
Name: Elizabeth
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Hampden, ME 04444
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please don't privatize our national parklands! Part of the reason I pay taxes is to conserve and protect wild lands, especially national parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 181

Author Information

Keep Private: No
Name: Michael
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Arivaca, AZ 85601
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

- * This plan will undermine the sense that the American people are owners of the parks when they show up and see corporate logos in parks.
- * The plan will reduce public confidence in the ability of the National Park Service to manage park resources for the public good.
- * The plan will turn park superintendents into fundraisers.
- * The plan will give undue influence to corporate sponsors in the management of national parks.
- * The National Park Service should not have any association with alcohol (or any other intoxicating substance for that matter) considering how many alcohol related deaths there are in this country every year.

PEPC Project ID: 60882, DocumentID: 71886 Correspondence: 182

Author Information

Keep Private: No
Name: Carl
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bar Harbor, ME 04609
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The moment we start selling "partnerships" in the NPS, we begin down a slippery slope that could all too easily lead to privatization and the wholesale prostitution of our public lands. Please nip this in the bud now. Increase park fees if you need money. But keep private corporations OUT.

PEPC Project ID: 60882, DocumentID: 71886
Correspondence: 183

Author Information

Keep Private: No
Name: James
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Berwyn, PA 19312
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I say a very strong NO to big corporations advertising in our national parks. Keep their power and influence AWAY AND OUT of our National Parks!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 184

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Yellville, AR 72687
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This proposed policy is offensive. The parks belong to all Americans, not the wealthy donor. There are many ways for donors to be recognized without naming/re-naming park visitor centers, exhibit wings, or any other park facility. I do not wish to see, nor I believe most Americans wish to see, a park filled with donor plaque benches, revolving naming of visitor or administration facilities, or especially corporate logo sponsored activities. Nor do I understand this pressure for park staff to undertake fund raising. Isn't that what park friends groups (what a ridiculous name "philanthropic partners") are for, and have done successfully? I don't care what the budget difficulties are. If any of these donors truly care for the parks, they will accept an off park recognition or a discrete mention in appropriate park literature, or an annual recognition program; the latter is the appropriate place if you must, to recognize level of giving and years of giving. Are the parks becoming the equivalent now of football stadiums and bowl games, or university donor programs? Where does it stop?

I can't help but wonder if this proposed change is for the benefit of certain projects and partnerships already underway. (I certainly do not understand the special alcohol provision in the proposed policy otherwise.).

PEPC Project ID: 60882, DocumentID: 71886 Correspondence: 185

Author Information

Keep Private: No
Name: Neil
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Saint Charles, IL 60174
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

It's a slippery slope whenever the goal of an organization is profit and not conservation. The purpose of the parks is to conserve the wild that remains, not profit from it. Local economies and states already benefit from having them, they draw millions of visitors each year. Don't let the greed of corporations get their hands in this. It is not theirs, it is ours.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 186

Author Information

Keep Private: No
Name: Sidney
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Weatherford , TX 76087
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

DO NOT SELL OUR NAT. PARKS OR FREE PUBLIC LAND TO ANY MINING COMPANIES. I feel that David and charles koch and some of the other billionaire welfare ranchers are behind this selling off the public land and national parks.i am a concerned citizen from TEXAS.8

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 187

Author Information

Keep Private: No
Name: Betty
Organization: First United Methodist Church of Orlando
Organization Type: I - Unaffiliated Individual
Address:
Orlando, FL 32803-5435
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/14/2016 Date Received: 05/14/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I only dreamed of coming to Acadia National Park until last year's cruise & visit at age 67. Each national park has it's unique ecology and environment. Each park should be allowed to keep it's uniqueness, be conserved & cherished for generations, now & in the future. Any commercialization or bathrooms costing millions are not what is unique or valued! Wildness is being threatened from every side. There are plants, & animals, wildlife that are endangered & threatened by "civilization" and its recreation. The parks are for the purpose of preservation and conservation. Even redwood growth has to be kept secret because harvesting greed. Vandals are becoming real threats as well, from ignorance of wildlife's value, and shared ownership with our citizens.

I revere John Muir for having the foresight to save our heritage. It belongs to everyone, not corporations!

PEPC Project ID: 60882, DocumentID: 71886 Correspondence: 188

Author Information

Keep Private: No
Name: Sue N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Greenville, SC 29615
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

No commercializations, no corporate, no way ever. These parks belong to the people, not private organizations. The people show their love and support by visiting in the millions, etc

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 189

Author Information

Keep Private: No
Name: J
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Charlotte, VT 05445
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Funding the National Parks through private sale and or private enterprise as well as selling them to the state would destroy them in short order. People are bombarded enough to with advertising and images of the "perfect life". What we need to do is unplug and be focused on where we are at that moment and the people around us. Our national parks, as they are now, is a perfect way to do this. Congress needs to come up with other ways to help fund them. Perhaps taking a pay cut since they hard work as it is.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 190

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
South Paris, ME 04282
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/15/2016	Date Received: 05/15/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

The last thing I would ever want to see at a State or National Park is corporate sponsorship. These places are for R&R, solitude, and escaping from the world. Please do not allow corporate America anywhere near our parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 191

Author Information

Keep Private: No
Name: Susan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Swansey, NH 03446
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The funding of national parks should be the sole responsibility of the US government. Keep private interest out of the park. Take a look at the historical issues surrounding this type of proposition. When the national parks were established the government wants to avoid the circus that was Niagara Falls. I for one do not want to see fastfood and cheap hotel chains in the national parks. They are national treasures and meant to be kept free from development and overuse. Keep private interests out of our national parks. Find them. Make corporations pay their taxes and raise the tax rate on the richest Americans and there won't be a funding issue. Stop catering to corporations who can't wait to get their greedy hands on our parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 192

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
San Diego, CA 92117
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Don't sell America for the benefit of corporate advertising.

The following portions of Director's Order #21 should be reviewed, and revised in a manner that do not provide corporations the same "selling power" as individual donors.

Please edit the following items:

Page 26, Line 935-939, Section 6.5 - Sponsorships

This must not be permitted. Media support, while valuable, is a direct sellout of public trust and should not be allowed. Allowing companies to gain advertising by indicating a park's message is "brought to you by..." is unconscionable and we do not allow this in other areas of public trust. Imagine, "Your United States Air Force, brought to you by Boeing." NPS will provide (sell) corporations a direct benefit by using a public brand when companies purchase advertising on behalf of NPS.

Page 32, Line 1176, Section 8.5.2 - Naming of interior spaces in facilities

While this is a good method of encouraging higher level private donations, it should be limited to private donors and not corporate entities. The benefit a company receives from advertising value outweighs the benefit of recognizing a private individual. In addition, the competition between corporate entities and private donors is likely to discourage private donations. Please limit this to individual donors only.

Page 33, Line 1197, Section 8.8 - Recognition of Corporate Donations

Due to the inherent advertising providing to a company, the benefit of corporate recognition outweighs that of private

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

individuals. This is not acceptable while using a public brand. Please edit this section to limit the ability of corporations to purchase advertising, or by limiting corporate recognition to the following means:

Page 31, Section 8.5.2, Line 1136 - Suggestions for In Park Recognition

Describing use of funds in interpretive programs is a suitable alternative for corporate recognition. Unlike media, which purchases pure advertising and creates a direct benefit at public expense, this method shows how corporate funds are being used to directly improve a park and demonstrates genuine intent in park restoration/operations. Please rely on this as the sole method of utilizing corporate funds in exchange for recognition.

Finally, I encourage NPS to invest in a public awareness campaign demonstrating the hardships currently faced by our parks. The circumstances forcing consideration of corporate sponsorship are not well known among the public and such a campaign could boost individual donations.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 193

Author Information

Keep Private: No
Name: Robert
Organization:
Organization Type: I - Unaffiliated Individual
Address:
crested butte, CO 81224
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Director Jarvis, you will be remembered as the Director who began the movement to commercialize National Parks and to provide large corporations unlimited influence over their future directions. Further, you are taking away from Congress their responsibility to fund the NPS and you will be remembered as the Director who continued to reduce the ownership of the parks by the public.

Please reconsider your decision to solve your funding problems by taking an easy shortcut rather than demonstrating bold, creative leadership. Do not allow the NPS to become more commercialized than they already are.

Bob

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 194

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Brownstown , MI 48183
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am opposed to the idea of partnering with corporations for finding in national parks. To do so would open up doors that could not be closed in the future. Commercialization has no place in national parks where the sole purpose is to preserve unspoiled areas. No one wants to see Old Faithful renamed as Coca Cola Geyser. Where there is money, there is also power and control- corporations should not have any say or control in how our national parks are run. Instead, the government needs to make our parks a larger priority. National parks are fairly inexpensive to visit (if you skip the souvenirs). There are ways to increase revenue without involving corporate sponsorships. Michigans tourism industry boomed after the launch of the Pure Michigan campaign and ads- something similar could reignite interest and awareness in our national parks as well. Please keep our parks as T.R. Intended them to be!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 195

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Doylestown, PA 18901
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Do not sell out our national treasures for the sake of funding. We love and visit these places to get away from the crap corporations try to ram down at us. If we need funding so bad, try selling of sponsorships to the military, Syrian support brought to you by Starbucks, for example!!!!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 196

Author Information

Keep Private: No
Name: Bruce
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Dumfries, VA 22025
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Privatising the NPS would be a horrible idea, furthering America's decent into a parody of its former self. Theodore Roosevelt would be spinning in his grave and would put a stop to this if he were still alive. There are plenty of other ways to fund the parks. Even if it included raising prices on tickets or to just go ahead and tax everyone and that be you're admission price. Let's keep it classy.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 197

Author Information

Keep Private: No
Name: William
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Crested Butte, CO, 81224
Crested Butte, CO 81224
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am against the proposed replacement order. The In-Park Recognition program will effectively allow for-profit corporations to use the NPS as an advertising venue. The proposal will award advertising space at events, in printed materials, on digital media, and on NPS vehicles to the highest "philanthropic" bidder.

Allowing for-profit corporations to advertise in the parks is a conflict of interest with the NPS's mission to "preserve unimpaired the natural and cultural resources and values of the national park system." Advertising within the parks is an impairment to the park experience, especially for the next generation of park visitors. I believe that young visitors' experiences will be shaped by the advertising they see. We need to preserve the parks' natural, cultural experiences, "unimpaired"; especially for young visitors.

The proposal to allow Authorized Employees to "accept donations and approve agreements" is a conflict of interest between the NPS' policy makers and profit-motivated corporations. Policy decisions made by Directors and Superintendents who are under pressure to fundraise could be influenced by high-value donors. The results for the NPS would be detrimental when those high-value donors are profit-motivated corporations

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 198

Author Information

Keep Private: No
Name: Marcia
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Lowell, MA 01851
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not commercialize or privatize our National Parks. Our tax dollars should be allocated for these gems without predudice. There are so few places left unspoiled by commercialism and our national parks should certainly remain so.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 199

Author Information

Keep Private: No
Name: Baird
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Johnson City, TX 78636
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is my public comment on the Draft Director's Order #21: Philanthropic Partnerships.

I have several very real concerns about the proposed changes to DO 21 and what they will do for the National Park Service and its employees. Certain specific donor recognition ideas, such as endowed positions and programs and interpretive media cut too close to donor recognition being more important than the mission of the agency and seem wholly inappropriate for a public service such as the NPS. The expectation that field employees will be involved in the donation process also crosses this line. The creation of a new duty for superintendents, that they will develop a donation plan and work on developing donors etc., may have the largest single, negative impact on the National Park Service. This change has the power to change the duties of the superintendent from managing a park for the good of the resource and the public to purely a fund raising position. Due to the historic power of the superintendent position in the NPS this will have a trickle-down effect across the park, establishing a new mission: generating funds. Superintendents are already placing their position goals in the performance evaluations of their employees. There is nothing stopping turning a park ranger into a fund raiser other than the good will of the superintendent. Has the agency thought about the unintended costs of the change in a superintendent's duties? Will all parks be able to raise enough money to pay for the new level of management staff required to fill in for the now absent superintendent? Worse, the notion that superintendents will do all of this without soliciting funds is a fiction and it is an insult to the public and the employees of the NPS to imply otherwise. This change alone is reason enough for me to be opposed to the draft version of DO 21 being implemented.

The previous history of the NPS fundraising efforts gives me no real reason to trust that this new order will be implemented in an ethical or productive fashion. There are currently NPS superintendents listed as ex officio board members of fund raising groups on their web pages, in direct violation of the current DO 21. What will be the mechanism to ensure that parks are not subsidizing in park fund-raising efforts? Superintendents will have no incentive to do this themselves once their performance rating is based on their ability to raise donations. There has been no demonstration of results from the agreement with Anheuser Busch, which appears to just have been an agreement designed to rent out national parks as concert venues for 2.5 million dollars. Will future NPS deals be similar sellouts for little or no real money because the public servants of the

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

agency lack the training and skills to negotiate with major corporations? This is something that no 40 hour course will be able to alleviate. Will future efforts to do right by the resource and the mission be cut short due to corporate objection like the about face on reducing plastic water bottles in the parks? Until the NPS demonstrates it is willing and able to follow the current DO it should not be allowed to change it.

Finally I do not think the NPS is thinking about the negative effects on morale that such a shift in policy could create. People work for the park service because they believe in the mission and the idea of public service. Agency management regularly uses this fact both within and without the agency as a promotion tool. Turning the most powerful position in a park into a fundraiser will change all that. What appeal will there be to work for an agency that is currently in a morale freefall, that pays less for equivalent work in other federal agencies, and has an in house reputation for eating its own, when it abandons its core mission for groveling for money? Especially since there is no evidence of this having been vetted across the agency in any real fashion. I wish I could feel better about this but I do not. I witnessed how state universities sought out corporate funds as state funds dwindled. The results were not better universities. The results were new business schools, box seats, and a whole new level of administrative staff and costs. Unless the NPS is staffed with something other than human beings I expect this to be the future of the agency.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 200

Author Information

Keep Private: No
Name: Barbara
Organization:
Organization Type: I - Unaffiliated Individual
Address:
N. Ferrisburgh, VT 05473
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please, please, please DO NOT privatize or commercialize national parks. That would utterly defeat their purpose and ruin them. People need to have unspoiled places where we can be immersed in an environment that's natural, not artificial. Funding for the parks must come from taxpayers/government, not corporations.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 201

Author Information

Keep Private: No
Name: Idora
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Goodyear, AZ 85338
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/15/2016	Date Received: 05/15/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

I don't think this is a good idea on any level. Public knowledge of the parks' struggles should come first. Have the parks host benefits, fundraisers or park awareness days. I believe if the public that frequents the parks know about what the individual parks need, the public will help in any way they can. There are too many wrong things about opening it to corporate sponsors. No park should EVER change it's name for corporate pleasure!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 202

Author Information

Keep Private: No
Name: Daniel
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Phoenix, AZ 85023
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Don't sell America for the benefit of corporate advertising.

The following portions of Director's Order #21 should be reviewed, and revised in a manner that do not provide corporations the same "selling power" as individual donors.

Please edit the following items:

Page 26, Line 935-939, Section 6.5 - Sponsorships

This must not be permitted. Media support, while valuable, is a direct sellout of public trust and should not be allowed. Allowing companies to gain advertising by indicating a park's message is "brought to you by..." is unconscionable and we do not allow this in other areas of public trust. Imagine, "Your United States Air Force, brought to you by Boeing." NPS will provide (sell) corporations a direct benefit by using a public brand when companies purchase advertising on behalf of NPS.

Page 32, Line 1176, Section 8.5.2 - Naming of interior spaces in facilities

While this is a good method of encouraging higher level private donations, it should be limited to private donors and not corporate entities. The benefit a company receives from advertising value outweighs the benefit of recognizing a private individual. In addition, the competition between corporate entities and private donors is likely to discourage private donations. Please limit this to individual donors only.

Page 33, Line 1197, Section 8.8 - Recognition of Corporate Donations

Due to the inherent advertising providing to a company, the benefit of corporate recognition outweighs that of private individuals. This is not acceptable while using a public brand. Please edit this section to limit the ability of corporations to

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

purchase advertising, or by limiting corporate recognition to the following means:

Page 31, Section 8.5.2, Line 1136 - Suggestions for In Park Recognition

Describing use of funds in interpretive programs is a suitable alternative for corporate recognition. Unlike media, which purchases pure advertising and creates a direct benefit at public expense, this method shows how corporate funds are being used to directly improve a park and demonstrates genuine intent in park restoration/operations. Please rely on this as the sole method of utilizing corporate funds in exchange for recognition.

Finally, I encourage NPS to invest in a public awareness campaign demonstrating the hardships currently faced by our parks. The circumstances forcing consideration of corporate sponsorship are not well known among the public and such a campaign could boost individual donations.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 203

Author Information

Keep Private: No
Name: David
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Santa Fe, NM 87501
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I realize that the National Park Service has been being starved of funds by the US Congress and that you have been looking for alternative sources for those funds. But the solutions proposed in Order #21 are most worrying and do not bode well for the future of one of America's great treasures and resources, our National Parks. It is one thing to recognize donors by having a plaque or small and unobtrusive sign placed in the park visitor center. It is another that allows advertising of the donor or the donor's products to be displayed to park visitors, many of whom have come to the park as an escape from the world of consumerism and corporate advertising. No National Park is a "Disneyland" and none should ever be allowed to become one. PLEASE KEEP ALL NAMING RIGHTS AND ADVERTISING SIGNS OUT OF OUR PARKS! LET US ENJOY OUR PARKS WITHOUT THE INTRUSION OF UNWANTED SIGNS!

A second issue of the proposal is the recommendation that the work of Park Superintendents and their staffs involve raising funds to supplement the meager appropriation from Congress. The NGO's and other supporters of the parks are the people who should be involved in raising funds, especially as the parks do not have sufficient staff to maintain and administer the parks without diluting their efforts by saddling them with additional responsibilities.

Please rescind your proposal and come up with one that keeps our parks free of inappropriate "donor recognition" and park staff free to do their jobs without saddling them with responsibilities that dilute their efforts.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 204

Author Information

Keep Private: No
Name: Michael
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Phoenix, AZ 85381
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/15/2016	Date Received: 05/15/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Please don't do it.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 205

Author Information

Keep Private: No
Name: Allison
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Hinesburg, VT 05461
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I have just returned from southern Utah. One of the things that struck me was the lack of commercialization in the National Parks and Monuments. And, it was a breath of fresh air to not be bombarded at every turn with ads and reminders of commercial interests. PLEASE keep these parks pristine and unmarked by corporate or personal interest. Must we debase everything in this amazing landscape?

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 206

Author Information

Keep Private: No
Name: Sarah N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Cedar Park, TX 78613
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

It's disheartening to learn that it is even being considered selling out to corporations. America is being slowly stripped of the qualities that once made this nation great. I will not be supporting America's parks if I'll have to call it Doritos Yellowstone Park.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 207

Author Information

Keep Private: No
Name: Blake
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Winthrop, MA 02152
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I do not support a public private partnership which would diminish the natural state of our national parks. Please do not allow such commercialization of our public lands.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 208

Author Information

Keep Private: No
Name: Mary
Organization: Friends of Theodore Roosevelt Island
Organization Type: I - Unaffiliated Individual
Address:
Washington DC 20003-9998
Washington DC, DC 20003
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Comments on Proposed Revision of Directors Order #21

The Friends of Theodore Roosevelt Island, a partner with the George Washington Memorial Parkway (GWMP) unit of NPS, is pleased to have the opportunity to comment on Directors Order #21. We strongly support NPS efforts to make philanthropic partnerships easier.

We offer the following comments, many of which are related to the impact DO #21 will have on smaller, newly formed, all-volunteer groups such as ours. We have a nine member, volunteer Board of Directors and no staff. The one-size-fits-all approach to DO #21 will put significant burdens and hurdles on partner groups like ours.

The provisions that we ask NPS to further consider are:

Advance approval of all fundraising material (Section 3.1.3, line 182-183, Section 4.3, line 472-473) The requirement for review and approval of all informational material about a proposed donation, proposed solicitation, or fundraising campaign before their distribution will place an undue burden on our small group and on the GWMP. Our fundraising efforts will be conducted by volunteers, not professional fundraisers, and will be local, community based activities that are not expected to exceed \$25,000. Currently, and most importantly, GWMP is not resourced to support this requirement. It typically takes GWMP at least a month to review Friends Groups products and if the additional burden of reviewing all fundraising materials from all the Friends Groups associated with GWMP is placed on them, we would anticipate this time period extending significantly. Although NPS staff are very supportive of the Friends Group - indeed, they have expressed repeatedly their gratitude - the staff are stretched thin, and responsible for an array of individual sites along the GWMP. This requirement would increase their workload exponentially.

In fact, this requirement targets for extraneous paperwork the very NPS units most in need of assistance from Friends Groups

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

like us: those NPS units with the fewest resources and the least staff. It is these very NPS units, such as Theodore Roosevelt Island within the GWMP, that will suffer the most. To illustrate, TRI has no full time ranger assigned to it. The NPS staff and the new Friends Group have a productive and complementary relationship, and the staff are eager for assistance in keeping the Island functioning, and promoting usage of the park by reaching a wider array of potential visitors.

We would suggest you consider limiting this requirement to fundraising campaigns over a certain dollar amount or have NPS provide parameters for fundraising material that Friends Groups would need to adhere to rather than preapproval.

Requirement for 100% donor vetting (Section 3.2, lines 387-388; Section 5, lines 623-625; Section 5.4, lines 731-739) - The imposition on partners of the same donor review process as that applicable to direct gifts to NPS will impose a substantial administrative burden on small groups like ours that rely on individual contributions. Having just launched in March 2016, we have 50 members and donors who have contributed between \$35 and \$500, amounts that in no way implicate NPS areas of concern with donations. Most of our contributions are via our website and Paypal and there is no practical way to vet the donors prior to acceptance of the funds. Of course, were we to receive a large donation, we would scrutinize the donation appropriately. This proposal makes no provision for groups that collect their donations from small donors, as opposed to fewer, large donations, and the provision includes no minimum trigger for a research requirement. The effect would be to force a small group like ours, which does not have any paid staff, to vet many small donations. Our typical donation of \$35 or \$500 simply does not trigger the concerns that this provision is trying to address. We do not believe that NPS's legitimate concerns over vetting those who make large donations simply are applicable in this situation and would recommend only applying this standard to those who make contributions about a certain dollar amount, such as \$25,000.

Requirement for an annual work plan (Section 3.1.11, lines 333-335) Imposing an annual work plan as an annual requirement would place an undue burden on small groups like ours and stress the limited resources of GWMP. We believe the current annual work plan forms should be modified and simplified for small groups like ours. The forms used currently by NPS identifies separate projects; sets a budget for each project; identifies for each project how the partner will raise the funds, the source of the funding and the amount and the value of in-kind goods and services; and how the partner will vet donors. For small partner groups dependent on small individual contributions, a prediction of how much money the group will raise each year is speculative. To require that the amount be further identified to particular projects in advance seems of little or no utility to NPS. Yet the time and effort required by our volunteer officers and directors to engage in such a detailed planning process is time that could have been devoted working to better the park. We would suggest an annual review as opposed to a new plan every year.

Requirement for philanthropic training and certification (Section 3.1.4, lines 211-213; Section 3.2, line 382) - This also puts an undue burden on small volunteer organizations like ours. With a working Board of Directors with 9 members and no staff, the imposition of layers upon layers of new requirements detracts from our ability to do what we all signed up to do - try to support the NPS to make Theodore Roosevelt Island a better place. This requirement is problematic on a number of levels. First, no one seems to have a clear indication of what the provision means, what it would actually require, and the cost to Friends Groups to meet this requirement. It could potentially vastly raise the cost of doing business to Friends Groups. This is certainly not the outcome that NPS is pursuing. In addition, it is a dangerous precedent for NPS to shoot first, implementing the order before affected groups understand what the order entails and have a chance to comment on the true meaning.

In-Park fundraising by partners (Section 4.6.1, Lines 541-550) - We support the proposal to authorize philanthropic partners to conduct fundraising activities or donor cultivation events, and solicit or accept donations on park property. This is a vital improvement on the current regulations, which preclude groups from gathering support in a geographic location meaningful to the donors. We need more information on how this provision would affect small parks like TR Island, which do not have a large enough geographic area to parse much under the Coburn law or other rules distinguishing locations within a park that can and cannot be used for fundraising. We believe line 548 should be modified to reflect the fact that donations collected can either directly or indirectly support a park initiative, asset, or program. While acquisition of members for our Friends Group will not directly support the GWMP or Theodore Roosevelt Island, it will indirectly support both by increasing the cadre of people who engage with the park (NPS avowed primary goal), help in the recruitment of volunteers for cleanup and invasive plant removal, and hopefully lead to additional donations in support of the park.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Tiering of philanthropic partners (Section 6.2, lines 796-821) - The designation of partnership status based on longevity, level of experience, expertise, financial investment, and extent of the partnership does not appear to value newer, smaller Friends groups devoted to lower priority, less visible, and poorly funded parks. It also does little to encourage the establishment of new, start-up Friends Groups. We would encourage a more inclusive approach that demonstrates the value and appreciation that NPS places on all philanthropic partners, large or small, new or well established.

Partner donor recognition plan (Section 8.3, 8.4, 8.5, lines 1087-1185) We applaud NPS in laying out specifics of how NPS can recognize donors both off-site and in-park. This is a major step forward and will serve to encourage donors.

We fully support NPS initiative to update Directors Order #21, and to reduce the inefficiencies currently required by the Order. We have been so appreciative of the embrace of the GWMPs staff, and we look forward to the prospect that fewer unnecessarily bureaucratic requirements will allow us to further assist NPSs vital mission going forward. The proposed Directors Order #21 includes a number of improvements, such as more flexibility for small groups to avoid unnecessary additional insurance, and greater flexibility to conduct outreach and fundraise. We believe that the increased flexibility to recognize donors will incentivize potential donors, and hopefully help to fill a critical resource gap that affects the ability of the park to engage with the public as anticipated by the original interpretive plan for the Island.

We appreciate the opportunity to provide our comments and look forward to continuing to work with NPS to strengthen our National Parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 209

Author Information

Keep Private: No
Name: William
Organization: Chesapeake & Ohio Canal Association
Organization Type: I - Unaffiliated Individual
Address:
Rockville, MD 20850
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am concerned about that this policy risks over-commercialization of the national parks. I understand that NPS seeks other funding sources to offset the real decline in its budget over the past decade. I applaud the effort to make the rules on donation more flexible.

However, national parks currently provide a refuge from the commercialization of our society. I don't want to lose this escape. The park service must guard against bombarding its customers with commercial messages. My visit to a national park shouldn't resemble a trip to a shopping mall.

I worry that partnerships with commercial entities will unduly influence park service decisions. News reports indicate that the bottled water association fought a park service restriction on sales of bottled water last year. Without commenting on the merits of this particular issue, I wouldn't want to see such decisions swayed by a park's partnership with a commercial entity.

These opinions are my own and don't represent the position of any organization with which I am affiliated.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 210

Author Information

Keep Private: No
Name: Kyle
Organization: US NAVY
Organization Type: I - Unaffiliated Individual
Address: Virginia Beach, VA 23462
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Don't sell America for the benefit of corporate advertising.

The following portions of Director's Order #21 should be reviewed, and revised in a manner that do not provide corporations the same "selling power" as individual donors.

Please edit the following items:

Page 26, Line 935-939, Section 6.5 - Sponsorships

This must not be permitted. Media support, while valuable, is a direct sellout of public trust and should not be allowed. Allowing companies to gain advertising by indicating a park's message is "brought to you by..." is unconscionable and we do not allow this in other areas of public trust. Imagine, "Your United States Air Force, brought to you by Boeing." NPS will provide (sell) corporations a direct benefit by using a public brand when companies purchase advertising on behalf of NPS.

Page 32, Line 1176, Section 8.5.2 - Naming of interior spaces in facilities

While this is a good method of encouraging higher level private donations, it should be limited to private donors and not corporate entities. The benefit a company receives from advertising value outweighs the benefit of recognizing a private individual. In addition, the competition between corporate entities and private donors is likely to discourage private donations. Please limit this to individual donors only.

Page 33, Line 1197, Section 8.8 - Recognition of Corporate Donations

Due to the inherent advertising providing to a company, the benefit of corporate recognition outweighs that of private individuals. This is not acceptable while using a public brand. Please edit this section to limit the ability of corporations to

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

purchase advertising, or by limiting corporate recognition to the following means:

Page 31, Section 8.5.2, Line 1136 - Suggestions for In Park Recognition

Describing use of funds in interpretive programs is a suitable alternative for corporate recognition. Unlike media, which purchases pure advertising and creates a direct benefit at public expense, this method shows how corporate funds are being used to directly improve a park and demonstrates genuine intent in park restoration/operations. Please rely on this as the sole method of utilizing corporate funds in exchange for recognition.

Finally, I encourage NPS to invest in a public awareness campaign demonstrating the hardships currently faced by our parks. The circumstances forcing consideration of corporate sponsorship are not well known among the public and such a campaign could boost individual donations.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 211

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Portland, OR 97086
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

While fundraising is one thing, we cannot let our parks to be simply bought by corporations. The last thing I want to do is to take a stroll through McDonald's wilderness in Yosemite. The parks are for the people. You said it yourself, "It's your park." Give it to the people, then. Let us invest in what could be the best kept entity in the US.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 212

Author Information

Keep Private: No
Name: Brian
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Quilcene, WA 98376
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am a former career NPS employee who believes in every aspect of the National Park Service Mission. I see draft changes to DO # 21 as contrary to this:

National Parks are one of the few public places that are free from commercial intrusion. Preserving this is in the public interest. While I understand there are real needs for increasing revenue through private-public partnerships, I am concerned with the language of this Directors Order weakening the "Firewall" that gives people the opportunity to experience what the agency has been entrusted to preserve and protect for, its intrinsic value, without the direct influence of consumer culture.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 213

Author Information

Keep Private: No
Name: N/A N/A
Organization: National Park Service
Organization Type: I - Unaffiliated Individual
Address:
Moab, UT 84532
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I fully support private donor money into the National Parks via such avenues as the National Park Foundation. To increase this revenue stream the National Park Service should change their rules to make it easier for private donors to contribute to parks.

However I totally disagree with private corporations sponsoring parks and thus being able to advertise their brands or products in our National Parks. I cringe every time I hear the radio ads for Subaru being a proud sponsor of our National Parks! Selling our National Parks to corporate sponsors will destroy the very soul of our Park Service ideal. The American people need and deserve places they can visit free of commercials and absent of the wishes of corporate sponsors intruding into their views and the landscape.

In addition, as has already been seen by the corporate concessionaires allowed to operate in our National Parks, increased corporate sponsorship would increase the power of corporations to influence the management of our National Parks. Park leaders and Superintendents already receive pressure from corporations to bend to their desires in order to increase profits for their shareholders. This corporate pressure needs to decrease rather than increase!

I understand all too well that the National Park Service is in desperate need of money, especially for the backlog of maintenance issues which need to be addressed in our parks. Ideally, electing a Congress that will fund the National Parks is the long term solution. Until then, perhaps raising some of the park entrance fees or looking at other sources of revenue, such as the Land and Water Conservation Fund, could assist with these needs.

Increasing visitation to National Parks is a clear sign that the American people love their National Parks. National Park leaders should preserve this love by keeping the parks free of corporate sponsorship, commercial logos and intrusive advertising.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 214

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Austin, MN 55912
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/15/2016	Date Received: 05/15/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Corporate sponsorship is not the future Americans want for their parks and monuments. We need zones in the country where neither commercials nor the wishes of corporate sponsors are part of the landscape.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 215

Author Information

Keep Private: No
Name: Matthew
Organization:
Organization Type: I - Unaffiliated Individual
Address:
North Bethesda, MD 20852
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please don't sell America for the benefit of corporate advertising.

The following portions of Director's Order #21 should be reviewed, and revised in a manner that do not provide corporations the same "selling power" as individual donors.

Please edit the following items:

Page 26, Line 935-939, Section 6.5 - Sponsorships

This must not be permitted. Media support, while valuable, is a direct sellout of public trust and should not be allowed. Allowing companies to gain advertising by indicating a park's message is "brought to you by..." is unconscionable and we do not allow this in other areas of public trust. Imagine, "Your United States Air Force, brought to you by Boeing." NPS will provide (sell) corporations a direct benefit by using a public brand when companies purchase advertising on behalf of NPS.

Page 32, Line 1176, Section 8.5.2 - Naming of interior spaces in facilities

While this is a good method of encouraging higher level private donations, it should be limited to private donors and not corporate entities. The benefit a company receives from advertising value outweighs the benefit of recognizing a private individual. In addition, the competition between corporate entities and private donors is likely to discourage private donations. Please limit this to individual donors only.

Page 33, Line 1197, Section 8.8 - Recognition of Corporate Donations

Due to the inherent advertising providing to a company, the benefit of corporate recognition outweighs that of private

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

individuals. This is not acceptable while using a public brand. Please edit this section to limit the ability of corporations to purchase advertising, or by limiting corporate recognition to the following means:

Page 31, Section 8.5.2, Line 1136 - Suggestions for In Park Recognition

Describing use of funds in interpretive programs is a suitable alternative for corporate recognition. Unlike media, which purchases pure advertising and creates a direct benefit at public expense, this method shows how corporate funds are being used to directly improve a park and demonstrates genuine intent in park restoration/operations. Please rely on this as the sole method of utilizing corporate funds in exchange for recognition.

Finally, I encourage NPS to invest in a public awareness campaign demonstrating the hardships currently faced by our parks. The circumstances forcing consideration of corporate sponsorship are not well known among the public and such a campaign could boost individual donations.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 216

Author Information

Keep Private: No
Name: Kate
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Paia, HI 96779
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

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Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

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Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 217

Author Information

Keep Private: No
Name: Maureen
Organization: Coalition to Protect America's National Parks
Organization Type: I - Unaffiliated Individual
Address: Tuscon, AZ 85750-1216
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

May 15, 2016

Reginald Chapple, Division Chief
Office of Partnerships & Philanthropic Stewardship
National Park Service
1849 C Street NW
Washington, DC 20240

Subject: 45-day review draft of Director's Order #21: Philanthropic Partnerships

Dear Mr. Chapple:

I am writing to you on behalf of over 1,100 members of the Coalition to Protect Americas National Parks (Coalition). Our membership is composed entirely of retired, former, or current salaried employees of the National Park Service (NPS). As a group, we collectively represent more than 30,000 years of national park management experience. The Coalition studies, educates, speaks, and acts for the preservation of Americas National Park System. We are writing to comment on the 45-day review draft of Director's Order #21: Philanthropic Partnerships (hereafter referred to as DO).

General Comments

1. In general, the Coalition supports the intent of leveraging additional donations and reducing some burdensome and bureaucratic barriers to fundraising efforts, particularly at the park level. However, we are concerned the DO undermines the importance of appropriations, mandates additional duties for park staff, and begins to send parks and the NPS down a road of increased commercialization.

2. Based on the revised DO as a whole, it is difficult for us, despite our extensive NPS experience, to understand exactly what it is that NPS is trying to accomplish with the proposed changes in policy. Is it to improve institutional controls of philanthropic partnerships, including Regional Office and Washington Office level oversight of park-based fundraising efforts? Is it intended to streamline fundraising procedures and requirements in a way that facilitates corporate fundraising at the national level (e.g., through NPF) and/or fundraising at the park level? Is it some combination of the above? To be frank, the DO appears to make it easier for high-level (e.g., NPF) fundraising but more difficult for park-level fundraising. And some aspects of the DO would allow greater corporate presence in parks in return for major donations, which raises obvious concerns about increasing commercialization of parks and the erosion of the public perceptions regarding the NPSs image and integrity. While there are references to ethics and integrity dispersed throughout the document, we believe that NPS should provide a much stronger foundation statement at the very start of the DO to communicate its underlying fundraising goals and philosophy. Such a statement would provide a much more effective context for understanding the policy guidance that follows. See comment below about Line 11 for a specific recommendation.

3. Based on its title, one would expect this DO to be mainly about Philanthropic Partnerships. Section 3.2 of the DO defines Philanthropic Partners as any entity - including non-public entities (such as nonprofit organizations and friends groups), for-profit corporations, fundraising networks, crowdfunding organizations, and individuals - that has an agreement TO FUNDRAISE OR OTHERWISE GENERATE DONATIONS (emphasis added) on behalf of the NPS. However, in reading through the DO it clearly addresses other aspects of partnering and partnerships completely unrelated to fundraising. We believe NPS should avoid scope creep and keep this DO focused on only the philanthropic aspects of such relationships.

4. Reference Manual 21 (RM-21) is mentioned 26 times in the DO; generally, in the context of RM-21 provides additional guidance (or procedures and forms) for [this activity]... However, an updated version of RM-21 is not available for review. This makes it impossible to comment about the adequacy of the 26 sections of the DO that refer to RM-21 without knowing if RM-21 will adequately fill in gaps that exist in the DO. This comes across as NPS saying trust us; we'll take care of it in the RM. Given the high profile nature of philanthropic fundraising in parks, we believe NPS needs to be more transparent and provide more information about how legitimate concerns regarding the DO will be addressed in the RM.

5. The DO often lacks symmetry between dos and donts and between respective NPS and partner roles and responsibilities, resulting in gaps in policy that leave open to broad interpretation what would or would not be allowed (such as what types of donations would or would not be accepted). We will point out some of the former instances in our comments below. An example of the latter is that while NPS expects philanthropic partners to be accountable for appropriate use of and proper recordkeeping related to donations received, there is no clear statement regarding NPS responsibilities for ensuring that donations it (NPS) receives are likewise spent in accordance with the partners or donors wishes. In general, NPS must hold itself to similar accountability requirements as the partner; and the respective accountability standards for each should be made clear in the DO.

6. We have some concerns about choice of words. In a number of places the DO is inconsistent in its use of possessive pronouns (its and ours) used when referring to NPS employees or partners as its employees or partners vs. our employees or partners. In general, NPS is used as a collective (or singular) noun throughout the document, which means that its, as a singular possessive pronoun, is the most appropriate form to use in the context of the DO. In our specific comments below, we have identified some locations where ours should be changed to its. However, we are not confident that we have identified ALL locations where the correction is needed; and therefore recommend that NPS carefully review the document and make all necessary corrections.

7. The way that some sections of the DO are written implies that the NPS intends to, or foresees the possibility it would, solicit funds or conduct fundraising campaigns itself, rather than only indirectly through the partner. Does NPS intend to do so? The language regarding NPSs role in fundraising must be clear and consistent throughout the document. See comment below at Lines 141-144.

Specific recommendations

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Line 11: At the beginning of the DO, NPS needs to establish a stronger foundation statement regarding the importance of conducting philanthropic partnerships in a manner that is widely perceived as both ethical and appropriate, and in a manner that avoids fundraising situations that would appear to compromise NPSs integrity or would otherwise reflect poorly on the NPS. In Section 1.1, we recommend inserting a new second paragraph, as shown below, which would make the current second paragraph the third paragraph, etc. The suggested new second paragraph is as follows:

In keeping with National Park Service Management Policies 2006, Section 1.10 Partnerships, the Service will embrace partnership opportunities that will help accomplish the NPS mission provided that personnel and funding requirements do not make it impractical for the Service to participate and that the partnership activity would not (1) violate legal or ethical standards, (2) otherwise reflect adversely on the NPS mission and image, or (3) imply or indicate an unwillingness by the Service to perform an inherently governmental function.

Line 20: After agreements, add provide for philanthropic opportunity while exercising&

Lines 141-144: Section 3.1.2 describes General Prohibition on Solicitation by Employees. While NPS employees are generally prohibited from soliciting donations, this section would exempt the Director and Deputy Directors from this general prohibition and allow them to solicit donations, directly or indirectly from private individuals or organizations for the NPS and its programs. Presumably, such soliciting would focus primarily on major donations; nonetheless, it is not an appropriate role for the three highest ranking NPS officials, and can create the appearance of a conflict of interest. We can envision a variety of situations in which this will be a significant concern. Although NPS employees at any level should not solicit donations, we believe it is appropriate for NPS officials, including the Director, Deputy Directors, and superintendents, to participate with philanthropic partners in donor cultivation meetings with prospective donors and to serve as the NPS subject-matter experts in providing helpful context and content as the partner solicits donations. (The DO describes this role for superintendents in Section 3.1.11.)

Line 200: Although donations or sponsorships by Concessioners may be entirely altruistic, it has the appearance of allowing a company to influence the NPS in their favor for consideration for a contract. This should be avoided.

Line 209: The table describes Delegations of Authority and Thresholds& The respective delegations of authority and thresholds are reasonable and appropriate, except that we do not think the NPS Chief Financial Officer (CFO) should have any authority whatsoever to authorize or accept donations or approve agreements given the CFOs control responsibilities listed in lines 288-304. This is a clear conflict of interest. The CFO is a control position regarding philanthropic activity and must not mix that with authorizing and/or accepting money or other goods or services of value.

Line 209: Same table as above. In the bottom section of the table, below the Superintendent line, the last sentence says that if a superintendent is delegated authority following training and certification in one region the authority does not move to another region if that superintendent transfers. Elsewhere the DO stresses that the delegation of authority lies with the individual, not the position. Why then should the NPS engage in the extra bureaucracy of having to rectify if she/he changes regions? Why cannot the NPS act nationally rather than as seven separate organizations when it comes to such an important subject that must have servicewide consistency? We believe that a certification by the NPS to an individual superintendent should follow that individual no matter where he/she serves as a superintendent.

Lines 210 - 219: Section 3.1.4 describes Philanthropic Competencies and Skills. Lines 213-214 state that authorized NPS employees will be REQUIRED (emphasis added) to complete a training certification program&to develop the knowledge base and skills for success in philanthropy and partnerships; then Line 215 indicates the training and certification program will also BE AVAILABLE (emphasis added) to key partner staff. While the intent behind the proposed training and certification program is admirable, unless the training is regularly and readily available for the people who need it when they need - a shortcoming of many existing NPS training programs - such a requirement is not practical and will not facilitate the establishment of, or improve the efficiency of, philanthropic partnerships. It will only serve to make it more difficult for such partnerships to get off the ground. This is also a concern about symmetry as it is unclear if the partners will be REQUIRED to attend the training or not. We suggest that NPS provide more detailed information about the proposed training program in the Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

pending RM-21. Ideally, it must be a more reasonable requirement than the current wording portrays.

Line 262: Should read Coordinate philanthropic partnerships& The DO is ONLY about philanthropy, and its language should be consistent about this throughout.

Line 309: Should read Encourage park and program philanthropy& Other partnership activities are not the subject of this DO.

Line 310: Should read Coordinate philanthropic partnerships&

Line 325-326: The sentence as written implies that ALL superintendents, whether they have philanthropic activity or not, must take the training. We suggest the wording be revised to say All superintendents ENGAGED IN PHILANTHROPIC ACTIVITY must take the training&

Lines 327-343: Section 3.1.11 describes Superintendents. As written, this section implies that ALL superintendents will engage in fundraising activities, which seems inappropriate to us. Line 328 should be revised to state: Superintendents ENGAGED IN PHILANTHROPIC ACTIVITIES will&

Line 340: Determination of what? Where is determination defined?

Line 342: Insert philanthropic before partnership.

Line 345: Quotation marks are not needed around donor cultivation. This is an accepted and common term in the field.

Line 350: After partners add including philanthropic partners. Again, this particular DO should remain focused on philanthropic partners.

Line 351: Revise to read &about partnership (not partnerships) issues, including philanthropic, to the&

Line 353: Add at the end including philanthropic partnerships.

Line 356: Add at the end including philanthropic.

Line 359: Why is the Council not named the NPS Philanthropy and Partnerships Council since the office is named the Office of Philanthropy and Partnerships?

Lines 366-388: Section 3.2 describes Philanthropic Partners roles and responsibilities. Whereas Line 328 states Superintendents WILL do the items listed in lines 329-343, Line 371 states NPS philanthropic partners MUST do the items listed in lines 372-375. But then line 377 states Philanthropic partners SHOULD do the items listed in lines 378-388. The variability in the wording is confusing and suggests intended distinctions that are not clear. Is there a difference between NPS philanthropic partners and Philanthropic partners? If so, what is the difference? If the Superintendent is required to do the items listed, why isnt the philanthropic partner required to do their respective items?

Line 382: The word program at the end of the line should be deleted.

Line 395: Section 3.3 describes Cooperating Associations. Line 395 refers to a Strategic Fundraising Agreement. Are the requirements for a partner in this kind of agreement and in a Philanthropic Partnership Agreement that allows fundraising exactly the same? They must be, both for legal and equality reasons.

Line 398: Why is the term (gifts) added here? Are not both donations and gifts the same in this context?

Line 406: The words helps us at the end of the line should be help it since it refers to the NPS, not a plural or personal entity.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Lines 412-429: Section 4.1 describes Types of Support Accepted by NPS. Such a list is inherently incomplete and whatever is not listed can generate more questions than what is specifically listed. To improve clarity and provide symmetry, we recommend that section 4.1 be immediately followed (e.g., at Line 430) by a new Section 4.2 regarding Types of Support Not Accepted by NPS (then renumber subsequent sections accordingly). Although information about types of donations that would not be accepted is located at various places later in the DO, it would be much clearer to establish both sets of criteria here.

Line 419: We strongly recommend against the NPS accepting easements unless it is prepared to defend them and monitor them. Consider the Green Springs, VA example. Instead, encourage that easements be given to a local or national group that has the capacity to manage them.

Line 421: Does intellectual property include trademarks? Given the current situation regarding trademarks, would it not be appropriate to specifically settle the issue in this context here and now?

Line 425: The NPS should be added to the start of the line, as in The NPS, parks, NPS programs& This is important because the Director and Deputy Directors are neither parks nor programs, yet they are authorized to accept donations of over \$5M. They are the NPS.

Line 427: Since donations may include property or other items of value rather than cash, add or value to amount of the donation so it reads: amount or value of the donation.

Line 429: Similar to the above comment, add or value at the end of the sentence.

Line 445: We suggest adding the following phrase after the word procedures: &including those required to comply with federal law or regulation. Doing so makes it clear that work such as preparing legally required documents such as an EIS, etc. can be paid for.

Lines 449-455: Section 4.3 describes Fundraising Campaigns. Despite the statement in sub-section a) that fundraising campaigns must be consistent with NPS purpose, mission, and goals, there is little anywhere else in the DO to indicate that NPS places high value on partnering with donors who are recognized for their environmental leadership and social responsibility. It is one thing to avoid relationships that could cast NPS in a negative light, which is the general perspective presented throughout the DO; it is equally, if not more, important to seek partnerships and donor relationships that are so completely positive that it enhances both the image of the partner or donor, as well as the NPS image. Toward the end, at line 454 (in sub-section b), we suggest NPS insert a new bullet along the lines of: fundraising campaigns that identify NPS with healthy products and activities, environmentally and climate friendly products and service, or socially responsible corporate programs are preferred. This will provide symmetry to the next bullet in that section (see next comment).

Lines 454 and 455: The bullet regarding fundraising campaigns that identify the NPS with tobacco, and any type of illegal product will not be authorized raises more questions and concerns than it resolves, both by what is stated and what is not stated. Does this mean that NPS would accept donations from sources that are closely identified with (or would identify NPS with) adult products and services, such as any/all kinds of alcoholic beverages, gambling, firearms, and certain pharmaceutical products? Would NPS accept donations from sources closely identified with environmentally or climate unfriendly industries, such as uranium mining or oil and gas development? Would NPS accept donations from marijuana sellers in states where it is legal? NPS, because of its environmental leadership responsibilities, should aspire to engage in highly positive relationships, rather than simply avoiding negative ones. This is why NPS needs to establish a clear list of Types of Support Not Accepted as suggested above in the comment about Lines 412-429.

Line 459: Add the NPS, before national parks.

Line 483: Does or will the NPS itself actually engage in cause-related marketing in partnership with philanthropic partners?

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Should this say NPS may authorize partners to engage in cause-related marketing on behalf of the NPS as part of philanthropic partnerships?

Line 492: Will cause-related marketing campaigns actually be designed (as stated on line 492) by the Office of Partnerships and Philanthropy (OPP)? Will OPP contract to design such campaigns? We doubt that will be the case and suggest that be designed and vetted (by OPP) be replaced by be reviewed and approved (or reviewed and authorized).

Lines 496-510: Section 4.4.2 describes Corporate Social Responsibility (CSR). In general, we strongly support the idea of NPS associating itself with socially and environmentally responsible corporate partners and donors. As stated previously, NPS should aspire to engage in highly positive relationships, rather than simply avoiding negative ones. However, the intended purpose of this section is not clear and much of it written in an awkward voice making it sound as if NPS is doing prospective partners a favor by allowing them to fulfill their CSR goals at a park (e.g., Lines 499-505: The NPS is a potential partner for companies with a commitment to CSR & the NPS can educate corporate leaders and employees about the National Park System and NPS programs & Corporate engagement [with the NPS] could lead to employee volunteer service days, donations to NPS initiatives through financial 504 contributions, employee donation matching programs, and pro bono expertise.). Chances are that any well-regarded socially responsible company has plenty of other partnership options and could teach NPS a thing or two about effective environmental leadership (e.g., Subaru's zero landfill program), encouraging healthy outdoor recreation, or improving diversity among park visitors. This entire section should be re-written in a more proactive and positive light opening with the fundamental premise that the NPS places a high value on partnering with outstanding environmentally and socially responsible businesses whose corporate values and actions are strongly consistent with those of the NPS. In their best form, such relationships are synergistic and enhance the image and success of both the NPS and its socially responsible corporate partner. Then get into the nuts and bolts of what the respective benefits of the relationship might be.

Line 504: Insert corporate before employees to be clear whose employees are being talked about.

Line 509: Change should to will to ensure consistent implementation of donor recognition plans by individual superintendents or program managers. Otherwise, following the plan appears to be discretionary, which could open NPS to criticism.

Line 515: Change our to its.

Line 519-521: We recommend removing the list of professionals that starts on line 519, and substituting the following: & expertise of any appropriate profession or trade needed to effectively manage parks and programs. Doing so prevents anyone from having angst that their profession or trade was not mentioned and makes it clear that all are equal.

Lines 531-534: The paragraph lists several potential sources of visitor names and contact information, but does not mention accommodation (i.e., lodging) registrations. Of course, names from such registrations also cannot be given out without specific permission from the visitor, but by leaving it out of this list, the NPS will immediately get many who ask if this means that information about accommodation registrants can be shared. Be specific and don't create a make-work project for the NPS. We realize that everyone should know the answer by now, but we know board members of friends groups who will immediately start asking again if the document is not clearly explicit. They do not want to give up because this would be the best way for them to enhance solicitation lists.

Line 580-583: Section 4.6.3 describes Checkout Counter Donation Program. It is not clear if NPF will retain any portion of a park's Checkout Counter Donations as administrative costs, handling fees or overhead. While we understand the general reasons for having NPF become the bank for handling and distributing such donations, the Coalition strongly believes that 100% of Checkout Counter Donations should be returned for use at the park-of-origin. Visitors making such donations do so believing their donation will be used to help the park they are visiting. To avoid the appearance that NPF is inappropriately taking a cut out of park-specific donations, we strongly recommend that wording be added to line 583, after & checkout program. and before Older practices&: (add) 100% of such donations will be returned to the respective park-of-origin for the

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

donation(s).

Line 592: We suggest revising the line to read Many of these new methods mimic traditional ways of giving, including donation boxes. We suggest this because the ways of giving continue to evolve, and tradition is not just limited to donation boxes. Be as inclusive as possible!

Lines 599 and 609: Line 599 states: Partners may use SOME (emphasis added) of the funds&, while line 609 states: Partners may use AN APPROVED PORTION (emphasis added)of the funds. We recommend using the language of line 609 in both places.

Line 621: It would be of value to add at this point that if IRS questions the value of a donation, it is an issue between the IRS and the donor, and not with the NPS.

Lines 622-634: Section 5 describes Donor Review. The DO states that, The NPS will review (vet) ALL (emphasis added) proposed donations or gifts, and their circumstances, before acceptance. As written, this statement appears to apply to ALL donations or gifts regardless of value, which presumably could include small, often anonymous donations. If that is the NPS intent, the policy is unrealistic. We recommend that NPS specify monetary or value thresholds for significant philanthropic donations and the respective approval authorities for vetting and approving such donations, consistent with the guidance offered elsewhere in the DO.

Lines 622-634: Related to the same section as above, it is a common perception among NPS fundraising partners that the current vetting process for medium-to-larger donations is already a problem due to the amount of time it often takes, which can keep prospective donors on hold for significant periods of time and thereby discourage a donation when a donor is inspired to make one. The proposed policy does nothing to improve this situation. While we completely understand the need for NPS to avoid the appearance of impropriety in the donations it accepts, for there to be an effective philanthropic fundraising program THERE NEEDS TO BE AN EFFICIENT AS WELL AS EFFECTIVE VETTING PROCESS! Unfortunately, the DO does not provide one. In addition to the delegation of approval authority and thresholds described in the table at Line 209, NPS needs to establish reasonable and reliable time frames for approval (or non-approval) decisions, especially at the Regional Office and WASO OPP levels, where the current concerns seem to lie. Absent an efficient vetting process, NPS and its philanthropic partners will continue to miss opportunities that are ripe for significant donations.

Line 626: We suggest a bullet prior to this line that reads, Ensure that the item proposed for donation is of value to the NPS.

Lines 635-650: Section 5.1 describes Acceptance Considerations. Consistent with our comments about Fundraising Campaigns (see Lines 449-455 above), a new sentence should be added at the beginning of the section (i.e., immediately before The NPS generally will not accept a donation that&). The suggested new sentence would be: The NPS prefers donations from sources that would identify NPS with healthy products and activities, environmentally and climate friendly products and services, or socially responsible corporate programs. This will improve provide clarity and context for the section that follows about what donations NPS will not accept. Aspire to engage in highly positive donor relationships, rather than simply avoiding negative ones. Also, there appears to be a formatting error and missing content in the transition from Section 5.1 to 5.1.1.

Line 638: We suggest that it be made crystal clear that direct donations means direct donations to the NPS. We realize that the context suggest this is the case, but suggest you add to the NPS to be fully clear.

Lines 639 - 647: Are there any circumstances under which the reasons listed for NPS declining direct donations would or could apply to NPS declining direct donations from philanthropic partners? If yes, how would NPS handle the proposed donation?

Line 643: Section 5.1 describes Acceptance Considerations. Are there guidelines anywhere that define or provide context for determining sources that would generate controversy&inconsistent with NPS mission? If not, there should be. Think, for Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

instance, of a uranium mining company operating near a park; or an air tour company that operates close to but not over a park and is not constrained by an air management plan; or companies that sell adult products, such as tobacco, alcoholic beverages, firearms, and certain pharmaceuticals. Lacking clear guidelines, the incentive to accept the money from any legal source that is not outwardly anti-park can overwhelm thoughtful judgment about how much controversy is acceptable. Aspire to engage in highly positive donor relationships, rather than simply avoiding negative ones.

Line 644: Change our to its.

Lines 648 - 650: We understand the reasons behind the proposed change in NPS policy that would allow NPS to permit-after thorough review-philanthropic partnerships with, and accept donations from, corporations that produce or distribute alcohol. Basically, it is about the money; and, frankly, this strikes us as an obvious attempt to retroactively legitimize the Budweiser donation. If NPS is, in fact, going to accept donations from from corporations that produce or distribute alcohol, then NPS must establish a much better defined criteria for determining when to accept (or not accept) such donations AND what the donations would be used for. For example, should a high-profile liquor manufacturers donation be used and publicized as sponsoring a park youth program or a family-oriented special event such as an Earth Day, the 4th of July, or Founders Day celebration? What impression would such highly visible donor recognition (this event sponsored by&) have on the children and parents present? Is that really the image NPS wants to convey?

The NPS image matters, so please dont dilute the positive image NPS has earned through many decades of caution regarding appropriate sources of donations. NPS should have higher standards (or at least some standards, since there are none in the DO) when it comes to the acceptance and use of donations from corporations that are primarily known for producing or distributing alcohol because of the potential controversy and negative publicity surrounding the acceptance of such donations (e.g., the Budweiser donation). We recommend that NPS add a new sentence (at the end of Line 650) that states: NPS acceptance of such donations will be limited to corporations that have a demonstrated commitment to protecting the environment, promoting healthy products and activities, AND have an established corporate social responsibility (CSR) program. Aspire to engage in highly positive donor relationships, rather than simply avoiding negative ones.

Line 790: At the end of the line, add but not limited to.

Line 818 - 821: Does this apply only to events raising money that comes directly to NPS or does it include money coming to NPS from a philanthropic partner? The format of this DO differentiates between the two throughout, and needs to be consistent in doing so throughout.

Line 882: Regarding the phrase Upon termination of an agreement, does this mean only when there is final termination of an agreement not to be renewed, or does it mean to include at the termination (or expiration) of an agreement that is going to be renewed and/or renegotiated as well? We assume it means the former, but it is not clear.

Lines 992 - 996: The \$500K standard was set decades ago, when \$500K had a great deal more buying power than it does today. We suggest that NPS consider a more reasonable standard, either using a fixed threshold (such as \$1.0M); or an index standard that is revised periodically, say every five years, based on changes in construction costs.

Line 1023: Change our to its.

Lines 1176-1185: Section 8.5.2 describes Suggestions for In-Park Recognition. In general, we strongly support providing meaningful donor recognition, as long as it is appropriate. However, some of the DOs donor recognition language should be clarified so that there are sufficient restrictions preventing commercialization of parks. We are specifically concerned with the NPS proposal starting on Line 1126 that would authorize the temporary naming of rooms and interior spaces in NPS facilities&to recognize donations for the renovation of an existing facility or construction of a new facility. While we understand the intent of providing significant donors with tangible, on-site recognition for supporting major facility improvements, we believe that naming of interior spaces in facilities violates the spirit and intent Section 3054(b) of the National Park System Donor Acknowledgment, which states, in part: & donor acknowledgment will not be used to state or

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

imply& naming rights to any unit of the National Park System or a National Park System facility (emphasis added), including a visitor center. The significant amount of negative publicity already generated by the NPS naming rights proposal should tell NPS how the American public views the perceived commercialization of park facilities or portions of those facilities. NPS should avoid granting naming rights under any circumstances, regardless of the significance of the donation. Instead, use any (or any combination) of the other suggested methods listed in this section (e.g., donor boards and walls that are integrated into the planning and design of any new facility or renovation of an existing facility). For large donations that are instrumental in the development of a new facility or major renovation of an existing facility, we recommend that the donor recognition be left in place for the lifespan of the facility.

In closing, we appreciate the need to improve the NPS philanthropic partnership process; and believe that, while the draft DO is a step in the right direction, it has many significant shortcomings that need to be addressed to make it more effective for both the NPS and its philanthropic partners. Thank you for the opportunity to comment on this important policy guidance.

Sincerely,

Maureen, Chair
Coalition to Protect Americas National Parks

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 218

Author Information

Keep Private: No
Name: Audrey
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kennesaw, GA 30144
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/15/2016	Date Received: 05/15/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Please do not sell National parks to corporate sponsors. National parks are a place where people can go and get away from their corporate lives and relax.

PEPC Project ID: 60882, DocumentID: 71886 Correspondence: 219

Author Information

Keep Private: No
Name: Mike
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Rockland , ME 04841
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please keep National Parks public. DO NOT privatize them. Private corporations historically have not had the publics best interests in mind. These are protected areas that need to stay that way and NOT be plundered by the Koch Brothers or others. So with the peoples best interest of this nation keep National Parks out of the hands of private ownership.

Thank you,
Mike

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 220

Author Information

Keep Private: No
Name: Susan
Organization: President, Montclair State University
Organization Type: I - Unaffiliated Individual
Address:
Montclair, NJ 07043
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This comment is in reference to Section 8.5.2, lines 1176-1185, Naming of interior spaces in facilities.

I write in opposition to the restriction of the naming period to five years. While a time-limited period is appropriate to contributions from for-profit corporations and their corporate foundations, it is absolutely inappropriate to private philanthropic gifts, and will, in fact, make such private gifts virtually impossible to obtain.

For-profit corporations and their foundations are essentially buying marketing rights, and when they provide a gift, they will size the gift to what they deem appropriate to the time period during which their name will appear. For them, essentially selling the naming rights for five-year periods can work.

Private philanthropists, on the other hand, give gifts to causes to which they have intellectual and emotional commitment. When they put their name on a project, they are thinking about a long-term and cross-generational legacy. My long years of fundraising suggest that such donors are not interested at all in purchasing short-term marketing. Private gifts should have a much longer time frame - perhaps something closer to 50 years or more. It is, however, perfectly appropriate to put into such agreements clauses that address what happens should the facility be demolished or radically renovated during that lengthier time period.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 221

Author Information

Keep Private: No
Name: Garrett
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Salem, OR 97301
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Privatization is not the answer. Especially as they are currently constituted where they seek short term profits over longterm sustainability. The National Park Service should be devoted to protecting and stewarding national resources and leave fundraising to the private "friends" groups and the National Park Foundation.

In addition, if a private company runs a park, that company stands to benefit from several economic conditions:

Lower admissions prices - especially among the largest, most popular parks, lower fees would mean more visitors
Lower employee wages - in order to undercut competition by charging less, companies may opt to pay their employees less than what current NPS employees make

Unless the federal government passes new minimum wage regulation or specifically mandates a starting wage for privately employed park employees, companies would have economic incentive to pay employees less.

Here is an idea... public assets like our NPS should be funded appropriately!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 222

Author Information

Keep Private: No
Name: Linda
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Veazie, ME 04401
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am writing in opposition to cluttering our public spaces with more corporate advertising. The great outdoors is a commons and we, as citizens pay for its stewardship and maintenance with taxes and philanthropic funding. We need to restore government (peoples) funding and stop this dreadful idea of logos and signage for soft drinks and consumer shopping.

Other countries I have travelled to have it right: not a lot of gift shops, signs and clutter- - the United States is already known for crass commercializations, it should not extend to our precious green spaces. Our environment has enough pressure on it, we don't need unelected and unaccountable organizations in to 'brand' and mange our public spaces.

I vote NO on this dreadful idea. Thank you.

And don't call it philanthropic partnerships. It's advertising, don't fool us or yourselves.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 223

Author Information

Keep Private: No
Name: Erin
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Downers Grove, IL 60515
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Creating philanthropic partnerships is a threat to our national parks. Corporations' main goals are focused on profits and unfortunately those goals are often in conflict with what will maintain the beauty and sustainability of national parks. This would hurt the tourism and economies of the areas that have national parks. Unfortunately this is very obvious in the case of Nestle in San Bernardino, CA. See link: <http://www.latimes.com/business/la-fi-nestle-water-lawsuit-20151013-story.html> Even in a time of extreme drought they continue to pump water without a permit. We have to stay stringent and keep them out of corporate sponsorship or they will take advantage for their own benefit. Unfortunately they are short sighted as well. Rather than engaging with long term repercussions, corporations look at what is going to increase their profits that quarter or that year. This sort of mindset does not keep the best interests of our national parks in mind.

I hope someday to bring my children to Acadia and to many other national parks. I hope they are not destroyed before then. Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 224

Author Information

Keep Private: No
Name: Catherine
Organization: Ms.
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98108
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I use the parks almost every day of the week. I think this idea of imaginary "philanthropist" is ignorant. There is nothing whatsoever philanthropic about a corporation. Sooner or later they are going to want something for their money.

I want something for my tax dollars, (yes, I realize you are underfunded and I vote for whoever that will fund my parks) therefore I do not want to see corporate logo, plastic bottles, or anything of that nature inside MY parks.

I want to enjoy them as they are and as the idea that was planned back when Roosevelt fell in love with the land and decided to embark on the thought of National Parks for the human beings of this country.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 225

Author Information

Keep Private: No
Name: Robert
Organization: New Jersey Community Development Corporation
Organization Type: I - Unaffiliated Individual
Address:
Paterson, NJ 07501
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am writing to support comments that point out that parks like Paterson's Great Falls National Historical Park will be hurt by guidelines that limit the amount of time for naming rights. In a place like Paterson, where it will be difficult to raise significant funds for a new visitor and education center, the ability to give donors at least three generations of naming rights will be crucial. Anything less will seriously compromise fund-raising efforts in a park like Paterson's. Please consider a carve out of some kind for parks like Paterson based on criteria that would clearly distinguish it from iconic parks like Yellowstone. And please understand that the ability to raise large sums of money and build a grand visitor and education center is not only likely to raise the profile of the park, but the profile of an entire city that is sorely in need of private investment. In your support for an urban national park, that objective is indeed a very important one that we hope you share.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 226

Author Information

Keep Private: No
Name: Hal
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am concerned, no even offended, about the possibility of the National Park Service pursuing corporate partnerships.

It is an absolute outrage that these partnerships are even being considered.

Our National Parks have been often called one of "America's best ideas"... Well, this plan to prostitute our parks has got to be one of "Amefrica's worst ideas". It is your responsibility to be a steward for these irreplaceable natural and cultural gems.

This misguided policy would allow corporate contributions to influence park policies, while turning public servants into corporate fund-raisers and diverting tax dollars to recruit in order to cater to corporate donors. This is simply NOT ACCEPTABLE!

In addition it would allow corporate logos on park fixtures and sell naming rights to park facilities. Again, completely UNACCEPTABLE!

Surely you can see that allowing this sort of crass commercialization to significantly degrade our National Parks is not the right approach. Director Jarvis, you need to go back to the drawing table and come up with a plan that does not bastardize the very concept and core values of our National Parks.

It is your responsibility to withdraw this disastrous plan. I understand the funding challenges you are facing, but commercializing and degrading our National Parks is not the proper approach.

Thank you for considering my comments.

Sincerely,

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 227

Author Information

Keep Private: No
Name: Laura
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Cambridge, MA 02139
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

To Whom It May Concern:

I am an ardent support of the National Park Service. I wish that the Department of the Interior and the National Park Service were fully funded, and have written my representatives in Congress urging them to do so. I understand the Park System is under-funded. However, this proposed change is not the way to solve this issue. The American People own these lands - not any private entity that may give funds to support the parks. This policy change opens the door to private corporations having special privileges in the parks - preferential treatment, access to areas or assets not open to the public, and special consideration from park officials. Much of the publicity about this policy change has focused on naming rights. The idea of a park trail, structure or feature being named for the highest bidder disgusts me, and violates the ideals that were involved in the founding of the Park System.

Again, there is no question that the Park System needs more funds. However, this is a dangerous step toward privatization. I am absolutely against this policy.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 228

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Boston, MA 02125
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is absolutely enraging to find Congress not providing funds. We do not want any more commercialization in the parks. The parks should be expanded and any adjacent land should be purchased and added to the NPS control. We will find out who these people are in Congress and they will be removed through out votes. Enough is enough!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 229

Author Information

Keep Private: No
Name: Sandra
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Oceanside, CA 92056
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

No! Do not sully "America's Best Idea" with the "Worst possible idea" to increase much needed funding to the parks. Corporate sponsorship and all that entails would forever change the very essence of the National Parks experience which is already being degraded by industrial tourism and the encroachment of digital technology. People desperately need a place they can leave behind urban life, mass consumerism and the constant onslaught of advertising and reconnect with nature.

The National Parks should be completely supported by tax-payer dollars. Individuals and Corporations should be encouraged to make donations if they desire to a general fund that supports the National Parks and these donations can be recognized on the NPS website not within any National Park. If we want to encourage younger people and families to visit the parks, their entrance fees should be lowered. While fees could be increased, especially for seniors who pay a ridiculously low \$10 for a lifetime pass. Due to seniors being some of the biggest users of the National Parks, perhaps the senior pass fee could be based on a sliding scale of a percentage of the purchase price of the Recreational Vehicle they are using to travel to the National Parks?

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 230

Author Information

Keep Private: No
Name: Patricia
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Beaverton, OR 97008
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Do not desecrate our shared natural spaces with advertising. We have a responsibility to the next generation as well as ourselves.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 231

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Simi Valley, CA 93065
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I work in conservation, so I understand the financial pressures of maintaining natural and cultural heritage.

This proposal is not only inappropriate but a slippery slope. Please do not allow further commercialization into our National Parks through corporate sponsorship. Instead, please press for appropriate Federal funding to eliminate the conservation deficit and encourage park visitors to do the same. Make your case- make is strong- and make it public. Please continue to cultivate philanthropic donations -without any advertising, sponsorship, special access or other perks in return.

In other words, whether it is a dollar from a visitor, \$10,000 from a bequest or a large corporate donation, these should be given without benefit to the donor. No tie-ins, logo displays, naming rights, franchise opportunities, etc. Every donation should be equal. The average person deserves that in principle and practice.

Furthermore, park staff have a conservation remit and should not be required to up-sell and cultivate corporate cash as if they are fast-food employees asking customers if they want to 'go large'.

Please scrap this misguided proposal and instead insist that our National Parks remain the world-class natural and cultural wonders.

PEPC Project ID: 60882, DocumentID: 71886 Correspondence: 232

Author Information

Keep Private: No
Name: Donna
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Pittston, ME 04345-6843
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

To whom ever it concerns,

I am saddened to hear that the consideration to let corporations gain control of our national parks, is being considered. These corporations do not care about anyone that may oppose their agenda. I believe that they'll 'make nice with bribery tactics and get what they want, then, just do as they please..sounds like bullying, if you can remember that from your childhood. It's not pleasant/nice and noone benefits, except for the bully! Keep it out of their hands.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 233

Author Information

Keep Private: No
Name: Warren
Organization:
Organization Type: I - Unaffiliated Individual
Address: 20 Riverview Hts
Winterport, ME 04496
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Commercialization of National Parks is a horrible idea, and against the entire principle National Parks were founded upon. They belong to the people and to our future generations. If commercialized, they will be destroyed in a generation or two. Same thing with Nestles and water... Nestles believes they have a right to our water- and to make a profit from it, stripping the rights of the people to have access to their own water rights.
THIS IS UNACCEPTABLE ON ALL COUNTS!!!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 234

Author Information

Keep Private: No
Name: Leslie
Organization: Advisory Commission for the Paterson Great Falls National Park
Organization Type: I - Unaffiliated Individual
Address: Williamsburg, VA 23188
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I believe the five year limit for naming rights that have been proposed would create a hardship for those National Parks located in economically distressed areas. As such the criteria should be flexible enough to reflect the various needs of communities. As we expect the future visitor centers to be much more interactive providing the visitors with experiences that would provide an understanding of the "why" such a park was established. Such visitor centers, especially in economically distressed areas, require much more of a dependence on private donors who would be more likely to make a major contribution with a longer limit. I am aware that some universities provide generational rights to major donors. As a matter of fact best practices in the charitable world suggest three generations for the length of naming rights.

I would recommend a minimum of ten years for a donation between 15 and 20 million and a formula be developed for donations over 20 million dollars.

Thank you for the opportunity to comment.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 235

Author Information

Keep Private: No
Name: Terry
Organization:
Organization Type: I - Unaffiliated Individual
Address:
SANTA FE, NM 87508
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This Draft Director's Order #21 is a terrible idea. It is an abject prostitution of our national heritage. I understand the desperate need for funding and indeed support higher taxes if Congress would appropriate more funding however, it is better to raise the fees, particularly for international visitors, than to stoop to this very bad proposal!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 236

Author Information

Keep Private: No
Name: Frances
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Pacific Palisades, CA 90272
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Parks are meant to provide a respite from commercialism, places where people can see nature or history without commercials and sponsors.

Please do not approve Philanthropic Partnerships if it means sponsor names on our parks. A list in a publication or wall somewhere with a list of donors should suffice if it's genuine philanthropy. Donors already receive tax benefits and the ability to inform the public of their generosity. There's no need to foul the parks with logos and ads.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 237

Author Information

Keep Private: No
Name: Joan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Grove city, OH 43123
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not do this. Our National Parks deserve to be preserved and supported by our government. Allowing them to slide into commercialism would be an abomination.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 238

Author Information

Keep Private: No
Name: Francis
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Paterson, NJ 07504
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I want to register an objection to a statement in the "Naming of interior spaces in facilities" category in 8.5.2 Suggestions for In-Park Recognition. The sentence "Naming is limited to a period of five years." should be eliminated.

This would place a severe handicap on the ability to attract donors. I don't understand the rationale for this limitation.

Thank you..

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 239

Author Information

Keep Private: No
Name: Jeanne
Organization: retired
Organization Type: I - Unaffiliated Individual
Address:
Anchorage, AK 99516
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Oh please do not do this to our national parks. I worked for NPS for 30 years and remember that this disguised form of privatization came up time again. Fortunately our agency's leaders had the strength, foresight and planning capabilities to prevent the commercialization of our national spaces. What a shocking surprise to hear about this plan as though it were a done deal, in our local newspaper just this week, 3 days before the "comment" period closes. With the Subaru sponsorship of the centennial (an anathema to me), I should have seen this coming. I experienced many times during my tenure at NPS, the lack of real effort to solicit and listen to public comment, as though we'd forgotten who we worked for.

I feel great respect for the NPS mission and spent my career protecting resources and engaging the public in this service, with the clear understanding that NPS employees are stewards of these public lands, now and we hope far into the future. This is a very serious, probably impossible responsibility, yet we have to give it our best shot. The fact that we, the citizens of this country, collectively entrust our nation's most special places to be managed by the NPS, holds all NPS actions to a higher standard. Selling out to the highest corporate bidder is not at all compatible with the NPS mission and therefore is not an option.

Our parks, preserves and monuments are such an important and unique facet of American life. Having enjoyed visiting many national parks since retirement, I know how loved our parks are - loved by citizens from all walks of life and by people from all over the world. Where else can we experience unspoiled cultural and natural spaces that are not intruded upon by development and overt marketing which bombards us from all sides EVERYWHERE ELSE.

Smart planning, downsizing (DSC??), improved and truly fair/open hiring standards to attract and hire the best and brightest agency leaders, increased efforts to engage the public and professionals as volunteers to help repair and manage our special public spaces- these things will get us through lean times as they have in the past.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 240

Author Information

Keep Private: No
Name: Brian
Organization: Mr.
Organization Type: I - Unaffiliated Individual
Address:
Parkton, MD 21120
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Hi I think this idea stinks. These parks have been protected from commercial interest for 100 yrs. Like everything else in this country we have to ruin it with big business. I would gladly pay more fees to enter the park then to have this take place. Better yet how about cutting the salaries of some of our elected officials who have given tax breaks to big corporations and tax those corporations what they truly should be paying and put that towards the parks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 241

Author Information

Keep Private: No
Name: Tammy
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kennesaw, GA 30152
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I understand that the NPS is horribly understaffed and underfunded. This is because our elected officials have continuously cut funding to NPS to do it's job. This whole idea is just setting up further development of these lands, belonging to The American People and no one else, for minerals, oil and who knows what else. These parks were given to us as a Gift from the people who fought so hard to make their existance possible. Please spend time educating the public to contact their elected officials (and how to do that) so that public is more aware of the funding problems and so that they can demand better. This is heartbreaking. This message needs to be in the mainstream, via TV as well as online.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 242

Author Information

Keep Private: No
Name: Jesse
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fort Smith, MT 59035
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am both a visitor of various national parks, and a National Park Service VUA. I agree that it is important to recognize those whose philanthropy benefits the parks and their visitors. I disagree with the re-naming of programs and interior spaces (end of section 8.5 of the 45 day review draft) for donor recognition.

Having walls that publicly recognize donors, and thanking our donors through press releases and other media, seem like practical and ethically-sound ideas. This is recognition, not advertisement. I've noticed that taglines and product endorsement are specifically prohibited (Section 8.1)- -which I agree with.

But having programs, positions, and interior rooms/spaces entirely paid for by and re-named for the private sector seems excessive, to the point that it threatens the neutrality of our parks. Advertisement isn't just about taglines and trademarks, but also about gaining influence over the public. There must be reasonable limits to how much influence any one donor can have over a park. This policy of re-naming programs and spaces seems to go beyond that reasonable limit.

This level of monetary involvement and donor recognition is influential enough on the public that it is essentially advertisement, and shouldn't be allowed. We mustn't allow the NPS to lose credibility in this manner.

Thank you for your time and consideration.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 243

Author Information

Keep Private: No
Name: Jonathan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Lovell, ME 04051
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I hope congress will reject the notion of allowing corporations to have control of our national parks. They need to remain a haven for cultural awareness and a pristine environment for people to enjoy as a distraction from the relentless advertising that we are subjected to on a daily basis.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 244

Author Information

Keep Private: No
Name: Krista
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bangor, ME 04401
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not succumb to pressure from Nestle about ANYTHING. They have been in the business of undermining individual's rights to health for dozens of years. From supplying infant formula to Third World mothers in the 1970's (<http://www.babymilkaction.org/nestlefree>) to surreptitiously changing zoning laws in order to gain cheap access to aquifers, Nestle is interested only in making lots and lots of money. The CEO, Peter Brabeck, has even stated that water is not a human right and access should be privatized. The NPS needs to remain free of the fetters that the Nestle corporation would provide. Please steer clear.

PEPC Project ID: 60882, DocumentID: 71886
Correspondence: 245

Author Information

Keep Private: No
Name: John
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Santa Rosa, CA 95401
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Bronze plaques only please. Please no logos.

If a corporation's heart is into their Philanthropic gift, they won't ask to deface the National Parks with logos.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 246

Author Information

Keep Private: No
Name: Timothy
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Winter Park, CO 80482
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This is disgusting, and flies squarely in the face of the history and explicit intent of the creation of our national park system.

PEPC Project ID: 60882, DocumentID: 71886 Correspondence: 247

Author Information

Keep Private: No
Name: Stephanie M. N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Warwick, RI 02888
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not do this to our National Parks. I love them as they are, not "disney-fied" commercial zones. I understand you need the money. I hope there is a way that we can take care of our parks without this. We need more federal funding.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 248

Author Information

Keep Private: No
Name: Kelly
Organization: National Park Service (FIIS)
Organization Type: I - Unaffiliated Individual
Address:
Patchogue, NY 11772
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

3.1.2 General Prohibition on Solicitation by Employees

Lines 141-144 Does NPS employee also refer to authorized employees as described in lines 151-155?

Lines 145-150 This is a useful and clear description of allowed activities of employees

3.1.3 Authorized Employees

Line 169 Sentence is not clear in its intent or description

Delegation of Authority Table

For the threshold for Superintendents it states that up to \$5 million may be delegated based on superintendent's grade, etc. There should be, perhaps in the RM, a more specific rubric so that this delegation is fair and equitable.

4.5 Volunteers and in-kind donations

Since this is in development as DO#7 is newly released and RM is not complete, there should be a careful review of both DO 7 and 21 to make sure the language and guidance is consistent.

4.6 and 4.7 Fundraising

At what point or level does a donation become tax deductible?

5.1 Acceptance Considerations

Lines 648-650 In regards to the comment "after thorough review, "what is the level of review? Superintendent, Region, WASO?

6.1 Philanthropic Partners

Line 770 Strategic Philanthropic Partners assist NPS with both short-term and long-term projects.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

PEPC Project ID: 60882, DocumentID: 71886
Correspondence: 249

Author Information

Keep Private: No
Name: Justin
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Whittier, CA 90601
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

PLEASE DO NOT open up our National Parks to private advertisement. If NPS chooses to do so, the very core mission and principles will be compromised and driven, in part, by profit vs. protection & education. I urge NPS to NEVER open up our National Parks to privatization. Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 250

Author Information

Keep Private: No
Name: Stephanie
Organization:
Organization Type: I - Unaffiliated Individual
Address:
San Pedro, CA 90731
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please don't sell out! National Parks a place to escape from the world of corporations, money, greed, etc.

The following portions of Director's Order #21 should be reviewed, and revised in a manner that do not provide corporations the same "selling power" as individual donors.

Please edit the following items:

Page 26, Line 935-939, Section 6.5 - Sponsorships

This must not be permitted. Media support, while valuable, is a direct sellout of public trust and should not be allowed.

Allowing companies to gain advertising by indicating a park's message is "brought to you by..." is unconscionable and we do not allow this in other areas of public trust. Imagine, "Your United States Air Force, brought to you by Boeing." NPS will provide (sell) corporations a direct benefit by using a public brand when companies purchase advertising on behalf of NPS.

Page 32, Line 1176, Section 8.5.2 - Naming of interior spaces in facilities

While this is a good method of encouraging higher level private donations, it should be limited to private donors and not corporate entities. The benefit a company receives from advertising value outweighs the benefit of recognizing a private individual. In addition, the competition between corporate entities and private donors is likely to discourage private donations. Please limit this to individual donors only.

Page 33, Line 1197, Section 8.8 - Recognition of Corporate Donations

Due to the inherent advertising providing to a company, the benefit of corporate recognition outweighs that of private individuals. This is not acceptable while using a public brand. Please edit this section to limit the ability of corporations to purchase advertising, or by limiting corporate recognition to the following means:

Page 31, Section 8.5.2, Line 1136 - Suggestions for In Park Recognition

Describing use of funds in interpretive programs is a suitable alternative for corporate recognition. Unlike media, which purchases pure advertising and creates a direct benefit at public expense, this method shows how corporate funds are being used to directly improve a park and demonstrates genuine intent in park restoration/operations. Please rely on this as the sole method of utilizing corporate funds in exchange for recognition.

Finally, I encourage NPS to invest in a public awareness campaign demonstrating the hardships currently faced by our parks.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

The circumstances forcing consideration of corporate sponsorship are not well known among the public and such a campaign could boost individual donations.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 251

Author Information

Keep Private: No
Name: James
Organization: Western National Parks Association
Organization Type: I - Unaffiliated Individual
Address:
Tucson, AZ 85755
Tucson, AZ 85755
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Summary of concerns from the Western National Parks Association to the National Park Service regarding the Draft Revision Director's Order #21

Section, Line, and Page: 4.6.3, 573 - 578, Pg. 17

Issue or Concern: Checkout Counter Donation Program (Guest Donation Program)

Implications to WNPA: The transformation of the Checkout Counter Donation Program is of concern to WNPA for the following reasons:

- 1) It revokes the grandfathered practice of providing visitor donations directly to a nonprofit partner instead of the NPF. Cooperating associations (with fundraising agreements) are able to offer checkout donation opportunities but they are now to be sent to the NPF for disbursement. There is no reason given for the change in the current system.
- 2) The Secretarial Order establishing the Guest Donation Program does not permit the NPF to assess management fees when a park superintendent has requested that the funds be sent to a local nonprofit partner. This clarification is not in the draft revision.
- 3) This revision does not authorize cooperating associations to accept small donations at checkout counters for the benefit of the NPS. However this authorization is presently implied in lines 551-552. Per the revision such activities would require a separate fundraising agreement. Also, associations are not authorized to recover administrative costs such as credit card transaction fees.

Section, Line, and Page: 6.2, 796-812 and Pg. 22 6.2.3, 829-834, Pg. 23

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Issue or Concern: Criteria for Philanthropic Partner Agreements and Strategic Fundraising Agreement

Implications to WNPA: The term of a philanthropic agreement and partnership status will be graduated according to a partner's level of experience, expertise, and financial investment, and will take into consideration the longevity and extent of the partnership. While this policy provides for partner agreements to be extended past 5 year terms, the five criteria for determination are of concern. Based on its long-standing partnership with the NPS, WNPA would appear to benefit from a Legacy Partner designation. However the criterion such as length of service of a CEO, the number of completed projects and fundraising campaigns, as well as the amount of funds given may have little meaning and may be impossible to measure uniformly across all philanthropic partners.

More importantly, WNPA is actually designated as a Strategic Fundraising Partner, one whose primary relationship to the NPS is to operate park visitor's centers and retail stores. The revised DO21 calls for an annual renewal of our fundraising agreement. The short duration of this agreement is not appropriate for cooperating associations and educational partners. It will be detrimental to WNPA's fundraising efforts as it would undermine trust between longtime members and WNPA as a financially secure nonprofit organization. It would also our direct limited resources to writing new agreements routinely.

Section, Line, and Page: 5, 625 & 736-744, Pg. 21

Issue or Concern: Donor Review and Vetting

Implications to WNPA: This section is of great concern to WNPA. The draft revision requires that philanthropic partners must submit the names of most of their donors to the NPS for review. This includes donations made directly and indirectly to the NPS. Depending on the amount of the prospective donation, the review process may include a superintendent, regional office, the NPS Washington Office and/or the DOI. There is no clarification as to how an organization like WNPA which serves multiple parks would direct its gifts for vetting. For example, if a gift served multiple parks would it need to be vetted in each of those parks?

Donors will object to being scrutinized by the federal government because they want make a gift to the parks. It will be impossible to execute the proposed policy for several reasons including:

- 1) According to PLA, the NPS does not have the capacity to vet a collective annual donor base of over 166,000 individuals.
- 2) Major donors will be insulted if nonprofit partners must refuse their gifts until background checks are completed.
- 3) Nonprofit organizations have a duty to protect personal information provided to them by donors, including those who give anonymously. The policy does not state how donor vetting will protect this information. The policy also states that a form must be submitted with donor information for any gift over \$25,000.
- 4) The new vetting requirement calls for vetting of any gift over \$50,000. The average wait time for vetting is 6 to 8 weeks.

Conclusion:

The revision of DO21 desires to increase park philanthropy and improve partnerships. The NPS Advisory Board has incorporated recommendations on best practices in philanthropy. Sections of the revision including those on donor stewardship, use of technology in fundraising, and partnership training are significantly improved. However, WNPA recommends that topics like donor vetting and criteria for partnership agreements be clarified or modified in alignment with our stated concerns and the additional suggestions of the Public Lands Alliance.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 252

Author Information

Keep Private: No
Name: Erica
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fort Bragg, CA 95437
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear Secretary Jewel,

Please do what ever you can to halt the move to use corporations to fund our National Parks. They already take up too much space and impact wild experiences for both people and wildlife.

I am most disappointed to hear that the Dept of the Interior is proposing new rules to expand the commercialization and corporatization of our National Park system, rules once before proposed (and rejected) under the Bush administration. These are our national treasures and belong to the people, and should not be farmed out to private interests who do not have the public interest at heart but are legally obligated to have but one objective: make money. We are the richest country in the world, we do not need to sell our birthright like this. Our priorities are askew, and it is your responsibility to right the ship.

I do not want to camp in Trump Meadow and hike to the Burger King Falls on the Celebrex Trail.

Please halt this misguided attempt to fund the NPS with corporate cash. It is a national embarrassment. One day less of our fruitless military adventures in the Middle East would pay for all of this and more. President Lincoln's maxim that this is a country "of the people, by the people, and for the people" is turning into "of the corporations, by the corporations, and for the corporations". Do not let even our wilderness go up for sale to the highest bidder.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 253

Author Information

Keep Private: No
Name: Sam
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Birmingham, AL 35216
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

National Parks belong to all the citizens of the U.S. and should NOT be 'rented out' to the highest bidders. Congress should do their jobs as representatives of the citizens and adequately fund the parks and wildlife preserves in order to maintain them in proper order for the use and pleasure of the citizenry.

CONGRESS! DO YOUR SWORN DUTY AND FUND THESE PARKS!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 254

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
lebanon, NH 03766
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/15/2016	Date Received: 05/15/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Please do not let corporate sponsors into our parks. The point of going to public parks is to get away from commercialization and embrace nature. That is why parks are paid for with public tax funds so that they are approachable to all and are named according to their histories.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 255

Author Information

Keep Private: No
Name: cynthia
Organization:
Organization Type: I - Unaffiliated Individual
Address:
canton, MI 48188
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I beg of you not to allow commercialization of our national parks. We so love taking our grandchildren to various national parks while they are out of school. From Acadia to the Grand Canyon and parks in between we so enjoy their pristine beauty.

There is so little left of the good America I shudder to think what it would be like to have OUR parks or the surrounding entrances encumbered with signage. Pigeon Forge, TN is an example of this.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 256

Author Information

Keep Private: No
Name: Deborah
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Hillsboro OR, OR 97124
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/15/2016 Date Received: 05/15/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

National Parks are about nature. Corporate logos are a distraction, a contradiction, and completely out of place.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 257

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Annapolis , MD 21403
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

At line 1181, the five year limit on donor recognition through naming of spaces in NPS facilities is likely to create unreasonable obstacles to substantial gifts especially for new visitor facilities. Recommend that the policy allow for the term of such naming to be determined as part of the donor recognition plan and / or that if any specific duration is to be offered as "standard" the Director or Regional Director should be authorized to make a fact-based determination of what longer duration is appropriate, considering such circumstances as:

- whether an essential facility could not be expected to be built without donor recognition for a longer duration;
- the duration of naming rights that other federal or charitable entities currently offer;
- whether the donor is a foundation or individual rather than a for-profit corporation or corporate foundation;
- whether the park lacks essential facilities like a visitor center in a park where such a center is essential to understanding the reason why the park was established; and
- the size of the gift.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 258

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Box Elder, SD 57719
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/16/2016	Date Received: 05/16/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Keep the corporate money out of our National Parks! These sacred places belong to all of us and they just want to profit off of something that does not belong to them. Their development of areas outside and adjacent to any National Park is destroying the feel of the park itself. We want to visit an uncomercialized Park and not be assaulted by all that commercializing brings with it.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 259

Author Information

Keep Private: No
Name: John
Organization:
Organization Type: I - Unaffiliated Individual
Address:

Eureka, CA 95503
USA

E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/16/2016	Date Received: 05/16/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

While funding opportunities for our national parks is always needed, renaming of areas for anything other than the historical significance or cultural identity of our monuments is a lessening of our national pride and an unnecessary lowering of the bar.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 260

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Wichita, KS 67212
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I believe the NPS should not seek out or accept any money from organizations or individuals that could undermine the goal to preserve and share the parks with the public. I believe corporate sponsorships in particular would undermine that goal. A public fundraiser might be a suitable alternative. Ask your parks for ideas on incentives and then set up an Indie GoGo fundraiser.

For instance, Acadia NP sold gorgeous nighttime photos not too long ago. Photos like that would make a wonderful incentive. As would cabin reservations for the high-tier donors. Keychains or postcards would be great for low-tier incentives.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 261

Author Information

Keep Private: No
Name: Colleen
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Greenfield, NH 03047
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

We live in a world where we are constantly bombarded by commercials and people trying to sell us products. One of the most incredible things about our parks is the ability to escape this. These sacred places gives us a place to escape the technology, the whirl of everyday life. That is why so many people come to get away from everyday life. I understand the need for funding, but I feel that this would start the parks down a path they could not return from. There has to be another way. As someone who loves the simple beauty of our parks, I plead with you not to cave to commercialization.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 262

Author Information

Keep Private: No
Name: David
Organization: Friends of Acadia
Organization Type: I - Unaffiliated Individual
Address:
Mount Desert, ME 04609
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear Director Jarvis:

Thank you for your efforts to update Director's Order 21 to enhance the ability of the NPS to work with private philanthropic partners to strengthen support for parks in the future. Individuals, organizations, and businesses want to donate to parks and are willing to do so in a thoughtful, professional, and ethical way. All too often, however, existing federal requirements can make these generous initiatives become very challenging, frustrating, or extremely inefficient. Indeed, the very culture of the National Park Service has at times in the past seemed at odds with the desire of others to help through philanthropy - as well as with the pressing financial needs within our parks.

Friends of Acadia is a private, member-supported, not-for-profit organization founded in 1986 by citizen volunteers who wanted to offer more opportunities for people to give back to Acadia National Park. FOA's mission is to preserve, protect and promote stewardship of the outstanding natural beauty, ecological vitality, and distinctive cultural resources of Acadia National Park and surrounding communities for the inspiration and enjoyment of current and future generations. We enjoy a close and highly collaborative and productive working relationship with Acadia National Park staff at all levels, from the superintendent to seasonal workers.

Friends of Acadia endorses the effort of the NPS to involve its Advisory Board in soliciting the expertise and perspective of those beyond the government or parks sectors in order to encourage a new approach to partnerships and philanthropy, and we support the fundamental recommendations of its report Toward a New Era of Philanthropy & Partnerships. We also understand that not every recommendation from that report has been incorporated into the proposed new DO21, but we appreciate the encouraging shift in direction in several key areas, including: a commitment to fewer and simpler partnership agreement documents, and opportunities for these agreements to have longer terms; greater emphasis on the role of the park superintendent in philanthropy, including greater authority to approve and accept donations; thoughtful improvements to guidance on donor recognition opportunities within parks. Thank you for these improvements, which I believe will be well-received and helpful here at Acadia.

I also would like to single out a handful of areas in which the proposed new order does not appear consistent with the above advances and recommendation of the Advisory Board report:

- Section 3.2: Philanthropic Partners: For the order to say that philanthropic partners "should" "raise, hold and manage an

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

endowment for the benefit of park projects and NPS programs" is a very tall order. FOA does in fact manage such endowments, but to say that all philanthropic partners should do so does not do justice to the wide range of organizations and their strategies and capacities.

- Section 5.4: Review of Contributions to Partners: the proposed change in the new draft to require all "indirect donations" that come to philanthropic partners to be vetted in the same way as direct NPS donations is extremely problematic and would represent a huge step backward from the existing order. Not only would this result in missed opportunities for partners like FOA, it would likely overwhelm the capacity of NPS to perform this role, and dampen the outlook for future contributions.

- Section 6.2: Philanthropic Agreements: the statement that philanthropic agreements may "authorize annual or membership campaigns, donor cultivation events, planned giving events, crowdfunding, and grants" implies a level of NPS approval or oversight of a private organization's funding activities that is impractical and unappealing.

- Section 6.3: Intellectual Property: Although the first several lines of this section appear to describe a framework for shared ownership, the last sentence undermines any sense of partnership and will alienate many if not all partners working closely with the NPS to develop forward-looking efforts in education, interpretation, communications and other programs.

- Section 8.5: In Park Donor Recognition: the inclusion of "endowments" within the section on in-park recognition is baffling. Such endowments seem more consistent with the list of methods listed in Section 8.4, Off-Site Donor Recognition. I outline these comments in the full spirit of partnership, knowing that you are balancing many competing interests and concerns. Improvements in the above areas could greatly strengthen the encouraging progress you have made in other areas of DO21. Thanks are in order to you, Jeff Reinbold, and Reginald Chapple for the time and effort you and many others have put into this important policy. Please don't hesitate to be in touch with any questions you may have.

Sincerely,

David, President
Friends of Acadia
Bar Harbor, ME 04609

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 263

Author Information

Keep Private: No
Name: Richard K. Starr
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Christiansted, VI 00824
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

There is no more central pillar of the principle of public lands and landmarks than their impartial stewardship by all of us. Sponsorship is a desecration of these places, both individually and collectively as a national idea, and MUST NOT be allowed.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 264

Author Information

Keep Private: No
Name: Susan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kennesaw, GA 30144
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please keep our Nationa Parks protected. These untouched lands are our connections to balancing and preserving life. No dollar amount can justify that balance.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 265

Author Information

Keep Private: No
Name: Joann
Organization:
Organization Type: I - Unaffiliated Individual
Address:
STATEN ISLAND, NY 10310
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Our National Parks are not for sale. You should be ashamed of yourselves wanting to sell off our precious land because you say you have no money. Bullshit. You have money for everything except things that are important. Let's put a stop to this bullshit now. Private corporations do not belong in our National Park system nor should they have a say about it. Private corporations are about greed and it looks like our Govt is starting to look the same. Shame on you. Our National Parks are beautiful and should be protected not sold to the highest bidder.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 266

Author Information

Keep Private: No
Name: N/A N/A
Organization: National Park Service
Organization Type: I - Unaffiliated Individual
Address:
austin, MN 55912
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

While I understand the need for an increase in funding for "our parks" corporate sponsorship is a slippery slope that will lead to an unwanted working relationship. Once money exchanges hands the parks are then obliged to reciprocate in some fashion, i.e. allowing these sponsors to splash their names around the parks, or worse, sell their products in the park. It sounds like a quick fix, but what we truly need is our government to fund the parks properly with the tax money they collect from all Americans each year.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 267

Author Information

Keep Private: No
Name: Kristen
Organization: Public Citizen
Organization Type: I - Unaffiliated Individual
Address:
Washington, DC 20009
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/16/2016	Date Received: 05/16/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Dear National Park Service,

Commercial Alert is a project of Public Citizen, a consumer protection organization based in Washington, D.C., with more than 400,000 members and supporters. We aim to keep commercial culture within its proper sphere, and to prevent it from exploiting children and subverting higher values of family, community, environmental integrity, and democracy.

Public Citizen strongly urges the National Park Service not to move forward with Director's Order #21: Philanthropic Partnerships, at least the elements that contemplate corporate sponsorships, partnerships and other entanglements. This proposal would dishonor the national parks and the legacy of the generations which built them up, and degrade the national treasure for future generations.

During a time when the National Park Service is in dire need of additional monies to preserve and maintain parks, we understand the pressure to find alternative forms of revenue. However, allowing corporations to put logos on benches and advertisements on large screens would do lasting damage to integrity of our national parks. Whether or not it makes sense in monetary terms - and the financial benefits should not be assumed - it will do unacceptable damage to the underlying spirit of the National Parks, informed by Theodore Roosevelt's observation that conservation of natural resources is "essentially democratic in spirit, purpose, and method:"

- Citizens are constantly bombarded with aggressive corporate advertising and influence everywhere they go; our national parks should provide a space for people to escape corporate clutter, a haven from a world where everything seems to be for sale.
- Allowing corporations naming rights and space for advertisements will inevitably result in corporate-influenced park policy. Disproportionate attention will be devoted to resources and assets attractive to corporate sponsors, at the expense of investment, maintenance and promotion of other National Park assets.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

- Business sponsorships enable corporations to skim the benefits of 100 years of public stewardship, as well as ongoing public support that vastly exceeds anything corporations might contribute.
- To read Director's Order #21 is to see the inevitable perils that arise from corporate entanglements. The order identifies certain businesses with which NPS will not partner, though troublingly states that it will partner with alcohol companies. Just to read the acknowledgement of potential problems with potential natural resource company sponsors is to see that those problems are inescapable and not open to satisfactory resolution.

America's National Parks have long served as an open resource for all citizens to explore, build social ties and camaraderie and learn from the natural world void of commercial intrusions. They are a commons - a public trust - supported and shared by all, equally, with no privileged access based on wealth or social status, free from commercial or interest group capture. That is what Theodore Roosevelt understood to be their democratic spirit.

Corporate sponsorships are antithetical to that vision. This centennial year of the National Park Service is the time to reinvigorate, not abandon, that essential democratic character. We urge you to abandon plans for corporate sponsorships at our great national parks.

Sincerely,
Robert Weissman
President, Public Citizen

Kristen Strader
Campaign Coordinator, Commercial Alert

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 268

Author Information

Keep Private: No
Name: Jim
Organization: Friends of Great Smoky Mountains National Park
Organization Type: I - Unaffiliated Individual
Address:

Kodak, TN 37764
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Friends of Great Smoky Mountains National Park
www.friendsofthesmokies.org

We appreciate the National Park Service dedicating the time and effort to create a draft with effective and meaningful changes to Director's Order 21. These changes can and will have an important impact on our organization as the primary nonprofit partner of Great Smoky Mountains National Park and we take this opportunity to share our opinions and concerns seriously.

As members of the Public Land Alliance, we enthusiastically support the community response letter PLA has submitted. In addition, we would like to express our specific concerns, emphasize recommendations for improvement, and celebrate successes of the draft in the following areas:

•Donor Vetting

We believe the provisions made in the Director's Order 21 draft show a lack of trust in NPS's nonprofit partners to evaluate their own donors. We do not believe that our donors will appreciate being subjected to additional scrutiny by the federal government and we expect that some donors will stop making donations altogether. This policy removes the spontaneity and inspiration from the fundraising process and ties the hands of nonprofit partners. Additionally, while unrestricted funds are sometimes used to offset administrative costs, there are very few donors who limit their contributions specifically to this area, so the exception to the vetting process for these donors does not make a meaningful impact.

Lacking from the policy is an explanation as to how the federal government will protect the privacy of all donors, including anonymous donors, during the vetting process, how the information will be stored and transmitted, or how the process is impacted by Freedom of Information Act inquiries.

The draft does remove the prohibition on accepting donations from companies associated with alcohol, an important step

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forward for the fundraising process.

- Checkout Counter Donation Program

We do not understand the need to pass money collected from such a program through the National Park Foundation. Donations made at the checkout counter in a particular park are understood by the donor to be used fully for the benefit of that particular park, not a national organization. There seems to be no reason to delay the donation process and lose a portion of the funds when the current systems works as the donor and the nonprofit partner both intended.

- Donor Recognition

We believe, as explained in PLA's community response letter, that a term of 5 years for naming rights is not a meaningful or valuable length of time to a prospective donor. A term of 10 years or more better aligns with the requirement that a donor cover operation, maintenance, and lifecycle costs of the named space.

- Donation Boxes

We and other nonprofit partners seek the ability to recoup the cost of managing and constructing donation boxes. Partners who manage donation boxes have inherent costs associated with collecting, counting, banking, managing and dispersing collected contributions. Additionally, many philanthropic partners are asked by the NPS to design, fabricate and install these boxes. The cost to properly construct a secure donation box can be significant, as can the cost to repair or replace vandalized, damaged, or stolen donation boxes. Cost recovery would give other nonprofit partners the ability to implement donation box programs in more parks.

Signed,
Jim, President
Friends of Great Smoky Mountains National Park

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 269

Author Information

Keep Private: No
Name: James
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Prospect, ME 04981
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Regarding Director's Order #21: Philanthropic Partnerships,

I wholly and completely oppose any connection between private companies, corporations, non-profit organizations, NGO's, or any other entity outside of the US Government and the US Park Service. In my opinion our parks should be fully funded by the US Government out of the US Treasury General Fund. What is more, this funding should be adequate to maintain and operate our parks in a manner commensurate with the expectations of American citizens who use these parks.

I understand that there are currently many so called "partnerships" between US parks and NGO's, corporations, companies, and non-profits however it is my wish that those "partnerships" be terminated.

thank you,
james
prospect, ME.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 270

Author Information

Keep Private: No
Name: Shannon N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kingston, MA 02364
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This cannot be allowed to happen. It's bad enough that corporations can buy our politicians, keep them out of our parks! This land is sacred. Keep it that way.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 271

Author Information

Keep Private: No
Name: Deb
Organization: Friends Alliance
Organization Type: I - Unaffiliated Individual
Address: .
Peninsula, OH 44264
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Friends Alliance
A network of philanthropic nonprofit organizations
working on behalf of our National Parks

May 16, 2016

Jonathan B. Jarvis
Director
National Park Service
1849 C Street NW
Washington, DC 20240

Dear Director Jarvis,

On behalf of the Friends Alliance, the network of nonprofit philanthropic partners to national parks, I would like to submit the comments that follow on the revision of Director's Order #21: Donations and Fundraising. The Friends Alliance meets twice a year to learn from each other and to interact with national leaders of the National Park Service. Our network consists of top level leaders of over 60 nonprofit organizations who take pride in our successes in working alongside NPS leaders to engage the American public in supporting and enjoying our national parks.

We would like to thank you and applaud your great leadership in recognizing and supporting the value of community involvement with our parks. Under your leadership, the National Park Service has wisely embraced the value of nonprofit partners. This proposed revision will make our work easier while continuing our shared commitment to protecting and preserving America's most treasured natural and cultural resources for future generations.

Friends groups have worked alongside the National Park Service for many years. Some of our groups are quite small and

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consist of a small group of dedicated volunteers. Other groups raise millions of dollars each year and support our parks with numerous critical projects. The majority of our groups fall somewhere in between. In addition to raising significant dollars for our parks, all of our organizations provide a means for the public to engage with our parks. People like to support assets they care deeply about, and the American public truly has a love affair with our national parks. It is our privilege to work alongside you to provide opportunities for Americans to provide financial, volunteer and programmatic support for our parks. We are very enthused about having a DO-21 that embraces the public and encourages them to respond to the needs of our national parks. Thanks to you and your staff for months of hard work and dedication that has brought us to this point.

Sincerely,
Deb Y

President
Friends Alliance

Director's Order #21: Donations and Fundraising Comments from the Friends Alliance

The comments that follow are a summary of those submitted to the leadership of the Friends Alliance. Individual groups may have chosen to also provide comments and some groups signed on to the comments submitted by the Public Lands Alliance.

Section 1 Background and Purpose

- We appreciate the invitational and positive tone in this section.
- 1.1. Lines 20-21. exercise some control over private parties' fundraising activities is not helpful language for nonprofit organizations, who are controlled by boards.

Section 3 Roles and Responsibilities

- 3.1. 1 Lines 122-123. Thank you for language that encourages NPS employees to support authorized fundraising efforts.
- 3.1.1. Lines 169-170. It is unclear what this line means. Is it intended that authorized NPS employees be engaged with every donation made to a partner that will ultimately benefit the NPS? We don't believe that the NPS has the capacity to be engaged at such a micro level with partner philanthropic activities.
- 3.1.3. Some found the table to be confusing and the thresholds to be low, especially for larger organizations.
- 3.1.3. Lines 182-183. This will create a large workload for NPS employees. If approvals are needed, they must be in a timely manner. We would prefer to avoid having to send every solicitation to the NPS and would like to see this limited to major campaigns and case studies. Many of our organizations have an extensive solicitation process and we believe that this level of review is unnecessary and would be time consuming.
- 3.1.4. Lines 211-215. We applaud the commitment to training and certification for NPS employees. We support a certification program for NPS leaders. We also support the development of a community of practice for NPS and nonprofit leaders. We urge caution in wording that might require or strongly suggest certification for nonprofit leaders. Many come to their jobs already well trained and sometimes certified, and we don't want to require an extra layer of time and financial commitment to nonprofit leaders and organizations. The words must have core competencies leads to the question of who is defining the core competencies.
- 3.1.6. Line 247. This is unclear. What determination is required by the Assistant Director? Does this apply only to donations of \$250,000 or more directly to the National Park Service?
- 3.1.10. Line 313. We hope that this means donations DIRECTLY to the National Park Service. We would not want the Regional Directors involved in vetting donations of this size made to partners.
- 3.1.11 Line 333. There is broad support for the annual work plan process. Thank you for this approach.
- 3.1.11. Line 336. Again, we assume that this means only donations of this amount made directly to the National Park Service.
- 3.1.11. Lines 344-347. Thank you for including this encouragement. We hope that it pertains to other NPS staff in addition

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

to superintendents.

Note: The confusion on donor approvals stems from lines 738-39: NPS policies govern the vetting of donations made directly and indirectly to the NPS. Gifts to nonprofit organizations cannot be treated the same as gifts to the federal government. Nonprofits should already have in place a gift acceptance policy that governs sources and types of gifts that they will accept.

- 3.2. Line 382. Accredited philanthropic competency and certification should not be required or even strongly encouraged for nonprofit partners. Some of the most skilled fundraisers are not "accredited or certified". If the NPS wishes to speak to this, they could suggest that organizations follow best practices in the philanthropic field, but to suggest accreditation or certification without designating and approving a program is unnecessary and could be problematic in a policy document.
- 3.2. Line 384. We think it is unwise for the NPS to suggest that groups manage endowments or investment accounts for the benefit of the park. The decision to establish and manage endowments or manage investment accounts is a nonprofit board's decision and tied to many factors. For example, some of our organizations utilize community foundations to manage endowments. For others it is not the right time in the life cycle of their nonprofit.

Section 4 Philanthropic Support

- 4.6. Thank you for including in-park fundraising. This is very helpful in allowing people to see that they can benefit parks with their charitable contributions while they are having a park experience.
- 4.6.2. Our organizations will be more likely to manage and promote donation boxes if there can be cost recovery for placement and administration of the boxes.
- 4.6.3. There will be little motivation for check-out campaigns in non-profit operated locations, such as bookstores, if all of the proceeds go to the National Park Foundation. While our organizations very much support NPF, this concern stems from thinking about the people on the front line who staff these locations and promote donations. They will be far more successful if they can promote support for a local organization and project. Also, some philanthropic partners operate stores or foodservice in facilities not owned or managed by the NPS and would like assurance that they can manage their own checkout program.
- 4.7. Lines 594 - 596. We do not want to see parks become competitive with their nonprofit partners through on-line giving. We would like to see this section state that where parks have friends groups with on-line giving opportunities, parks should refer and link people to their partner sites.

Section 5 Donor Review

- 5.1. Line 639. Many philanthropic partners utilize CUAs in order to conduct certain aspects of their business. They should be exempted from this prohibition.
- 5.3. If this entire section applies to philanthropic partners as stated in line 738, then there are major objections to this section. This received more comments from our network's organizations than anything else in the document. Specific comments follow.
- Line 700. For donors who make pledges over multiple years or with whom an organization has a long standing and close relationship, this will create more work and could create a sense of distrust. There is concern about submitting the names of prospective donors, as we work with many prospective donors.
- Line 712. This was the single biggest concern raised. The donation amount is extremely low. Donors to nonprofit organization will not want to fill out a form and give personal information to the federal government. We believe that this requirement cannot apply to donations received by nonprofit organizations.
- 5.3.3. We believe strongly that donations from charitable foundations should be added to the list of exceptions.
- 5.4. You can require philanthropic partners to have gift acceptance policies and these should be shared with the NPS or included as an addendum to a philanthropic agreement. Our organizations know their donors well and can include NPS restrictions in their gift acceptance policies.

Section 6 Public-Private Partnerships

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- 6.1. Lines 768-770. Groups that serve multiple parks, such as Eastern National or NatureBridge, are limited by the language around Strategic Philanthropic Partners. The type of authorized partner should be determined by the activity the partner performs, not its historical purpose or central purpose. Some groups are not friends groups that typically fall into the philanthropic partner category, but they have the capacity and sometimes the need to do fundraising that is long term and strategic.
- 6.2. Lines 799-807. We applaud the NPS for considering longer term agreements. Longer agreements give us important credibility with potential funders. There are a variety of opinions on how to tie length of agreements to performance of nonprofits. The most common comments focus on length of service by the organization and significance of contributions. It is also suggested that it might be helpful to add a category of "operating partner" for organizations who operate visitor centers or education centers and for whom a cooperating agreement might not be the best tool.
- 6.2.6. Line 865. For larger philanthropic partners, \$1 million may be too low of a threshold to pay for a feasibility study. The need for a study varies depending on the proposed source of funds.
- 6.3. Lines 882-883. The statement that all developed intellectual property will be conveyed to the NPS will cause organizations to avoid developing intellectual property with the NPS.
- 4.4. Lines 913 - 922. Use of NPS marks and logos visually inform the public of the partnership between the NPS and nonprofits. It would be difficult to determine how this directly leads to specific revenues. We hope that a regular display that represents partnerships would not require case by case approval.

Section 7 Partnership Design and Construction Projects

Several organizations that have been involved in partnership design and construction suggested that partners with proven experience in construction projects be permitted to have additional options beyond the three described in this policy. The ability to combine federal and philanthropic funds for partner execution, with federal oversight, can be more efficient and result in cost savings.

Section 8 Donor Recognition

- 8.2.1. Line 1062. Please add that park superintendents and park managers will develop donor recognition plans in collaboration with their philanthropic partners.
- 8.5.1. Line 1124. Partners should not be required to set up an endowment or maintenance fund. Organizations may have other ways to handle this, such as lines in their annual budget.
- 8.5.2. Line 1181. The limit of five years is strongly rejected by our network. The length should be determined by the superintendent and the philanthropic organization, taking into account the size and scope of the donation related to the park site. One impassioned plea came from an organization currently building a visitor center in an impoverished area, where large donors would seek family recognition that would last for 2 - 3 generations if a substantial gift were to be made. Others have suggested that 10 - 15 years is preferred, with an opportunity to review for a longer time period, in the case of a gift substantial to a project.
- 8.9. Thank you for this section.

One overarching comment that was raised multiple times: It would be helpful to have a line or two to acknowledge that at times there will be needs for waivers to this policy, due to unique circumstances of an individual park or philanthropic partner. This is due to the variety of park sites, partners, and communities that are covered by this policy. Waivers that can be approved by superintendents and regional managers, in consultation with national leadership, would be helpful in order to address unusual circumstances.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 272

Author Information

Keep Private: No
Name: Andrew
Organization: Friends of the Washington Canoe Club
Organization Type: I - Unaffiliated Individual
Address:
Washington, VA 20007
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As a leasee of a historic property within the C&O canal historic park, WCC has been preparing for rehabilitation of our NTHP listed clubhouse for the past few years. We are aware of DO21 and are honestly not looking forward to yet another bureaucratic hoop and formality in our process. We are fully committed to having a solid financial plan and feasibility study backing our rehabilitation efforts, but all too often have found that meeting the standards and scrutiny of NPS is an onerous exercise that distracts from the actual "work". In fact, when we have discussed financial planning and feasibility studies with NPS, they've often said something to the effect of "well, you may have done a plan in the past, but we'd need you to hire a consultant that would do a feasibility study to "our standards"". As a largely volunteer run and led organization, the last thing we need are additional process and procedures. In fact, it seemed that we spent inordinate time back and forth several years ago to even determine if our particular project would be subject to DO21 - more consistent qualification standards might help, but I'd imagine we'd still fall somewhat into a grey area (the underlying land is NPS owned, but the ownership of our clubhouse is in contention). With a long term (60 year) lease and as an IRS approved 501c3, NPS should believe that as a club we are committed to, and have the resources adequate, to fund appropriate restoration. We hope that you will revise the DO21 pursuant to Public Lands Alliance and NTHP comments. Please contact me to discuss further if you wish.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 273

Author Information

Keep Private: No
Name: Dan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kings Canyon, CA 93633
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am very concerned about allowing what amounts to corporate sponsorship of park programs. This policy means we will start having the evening program brought to you by "evil corporate company", and that company will have the power of the purse to influence the content of that program. Unfortunately the NPS will be in a position of submitting to the corporate demands over content or lose out on the "donations". This is a terrible policy which will devalue and corrupt the NPS.

By allowing parks to become show ponies of corporations the NPS will lose its inherent and intrinsic trust with the public. Will the Jefferson Expansion Memorial be brought to us by Budweiser and Glacier Bay NP&P visitor center presented by Exxon?

Do not tarnish America's best idea by selling out to the highest corporate donor. The policy needs serious rework to remove the ability of parks to become the spokes-person for corporations. Will rangers begin to look like NASCAR drivers with corporate brand patches over our uniforms to please the money? Will evening programs end with a sales pitch for the latest product from "our sponsors"?

This Director's Order cannot be approved in its current form. The Director needs to rewrite this order and remove any ability for the NPS to be sold out to the highest bidder (sponsor). Corporate sponsorship and funding of the NPS needs to be removed. Corporate funding of NPS positions, sites and programming is not appropriate nor is it consistent with the NPS mission.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 274

Author Information

Keep Private: No
Name: Marcia
Organization: The Pew Charitable Trusts
Organization Type: I - Unaffiliated Individual
Address: Washington, DC 20004
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

May 16, 2016

Director Jonathan Jarvis
National Park Service
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Director Jarvis:

The Pew Charitable Trusts welcomes the opportunity to express our views on the National Park Service's proposed revisions to Director's Order #21, relating to philanthropic partnerships. Pew encourages public-private collaboration that may help ensure our National Park System is adequately prepared to maintain, protect, and interpret the agency's tremendous inventory of assets for generations to come.

It is imperative, however, that implementation of this Order not be viewed as rationale to decrease federal appropriations for the National Park Service (NPS), the primary source of funding for the agency. With that caution, we recognize there may be opportunities to leverage and supplement, not replace, congressional support. We recognize and appreciate that it is the intent of the proposed revisions to Director's Order #21 to provide such opportunities. Several specific suggestions and concerns follow.

By its own estimate, NPS has a deferred maintenance backlog of nearly \$12 billion. The Director's Order should provide more guidance to NPS managers about including deferred maintenance needs as criteria when evaluating philanthropic arrangements. Without more guidance, maintenance needs that are critical to the health of a park unit, but not necessarily

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visible to the public or of interest to a potential donor, may remain neglected. Specifically,

1. Section 3.1.3, Authorized Employees. Line 189, subsection a) should be modified to state, "Identify NPS projects, including deferred maintenance projects; programs; activities; or objectives suitable for philanthropic support."
2. Section 3.1.7, WASO Division Chief, Office of Partnerships and Philanthropy. We urge adding a bullet stating that the Division Chief will "Encourage philanthropic partnerships and donations that address deferred maintenance projects."
3. Section 3.1.11, Superintendents and Section 3.2, Philanthropic Partners. The respective requirement that superintendents and philanthropic partners will "develop an annual work plan with the philanthropic partner/the park superintendent based on the identified needs of the park and program areas" should include language stating the work plan will lay out how future maintenance needs will be handled.
4. Section 4.3, Fundraising Campaigns. A subsection (e) should be added that states, "Consider projects in the deferred maintenance backlog."
5. Section 5, Donor Review. We urge the addition of a bullet that states, "Ensure the broad array of park needs are equally attended to."

NPS managers should evaluate philanthropic partnerships for opportunities to repurpose existing facilities and/or assets, before considering the construction of new facilities.

1. Section 4.2, Use of Donations. Subsection 4.2(b) should reference the guidance in Section 7 in more detail and explain that the existing NPS Partnership Construction Process will be invoked for philanthropic partnerships that involve construction. We suggest that Section 4.2(b) indicate that scrutiny will be given to new construction proposals to evaluate if existing NPS facilities could be used-with renovation and/or modification-in lieu of constructing new assets.
2. Section 7, Partnership Design and Construction Projects. This section should do more to highlight the importance of the sustainability of existing park resources and assets, as well deferred maintenance needs. We suggest that lines 966-969 be modified to include a statement that NPS will consider the use/repurposing of existing assets before considering the construction of new assets as part of a philanthropic partnership.
3. Section 7.1, Design Competitions. Another bullet should be added that states, "That new construction is warranted, and there are not already existing constructed assets that could serve the needs of the philanthropic partnership."

Section 3.1.12, NPS Partnership Council. The NPS Partnership Council should include the Chief Financial Officer, to ensure full consideration of financial and contract issues in philanthropic partnerships.

Again, we appreciate the need for NPS to seek new and nimble sources of supplemental funding. We are wary of the additional time constraints Director's Order #21 may place on NPS managers and hope that other key aspects of their jobs-the protection of natural, historic, and cultural resources, planning and management, and interpretation-do not fall behind because of increased requirements that may not be matched with increased staff capacity.

Thank you for your consideration of our comments. I can be reached at 202-329-0793 or margust@pewtrusts.org should you have any questions.

Sincerely,

Marcia
Director, Restore America's Parks

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 275

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Falls Church, VA 22042
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Don't sell America for the benefit of corporate advertising.

The following portions of Director's Order #21 should be reviewed, and revised in a manner that do not provide corporations the same "selling power" as individual donors.

Please edit the following items:

Page 26, Line 935-939, Section 6.5 - Sponsorships

This must not be permitted. Media support, while valuable, is a direct sellout of public trust and should not be allowed.

Allowing companies to gain advertising by indicating a park's message is "brought to you by..." is unconscionable and we do not allow this in other areas of public trust. Imagine, "Your United States Air Force, brought to you by Boeing." NPS will provide (sell) corporations a direct benefit by using a public brand when companies purchase advertising on behalf of NPS.

Page 32, Line 1176, Section 8.5.2 - Naming of interior spaces in facilities

While this is a good method of encouraging higher level private donations, it should be limited to private donors and not corporate entities. The benefit a company receives from advertising value outweighs the benefit of recognizing a private individual. In addition, the competition between corporate entities and private donors is likely to discourage private donations. Please limit this to individual donors only.

Page 33, Line 1197, Section 8.8 - Recognition of Corporate Donations

Due to the inherent advertising providing to a company, the benefit of corporate recognition outweighs that of private individuals. This is not acceptable while using a public brand. Please edit this section to limit the ability of corporations to purchase advertising, or by limiting corporate recognition to the following means:

Page 31, Section 8.5.2, Line 1136 - Suggestions for In Park Recognition

Describing use of funds in interpretive programs is a suitable alternative for corporate recognition. Unlike media, which purchases pure advertising and creates a direct benefit at public expense, this method shows how corporate funds are being used to directly improve a park and demonstrates genuine intent in park restoration/operations. Please rely on this as the sole method of utilizing corporate funds in exchange for recognition.

Finally, I encourage NPS to invest in a public awareness campaign demonstrating the hardships currently faced by our parks. The circumstances forcing consideration of corporate sponsorship are not well known among the public and such a campaign

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could boost individual donations.
Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 276

Author Information

Keep Private: No
Name: melanie N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
moab, UT 84532
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/16/2016	Date Received: 05/16/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Please reconsider corporate sponsorship of our National Parks, Monuments, Trails, Battlefields, Seashores, and other areas. Yes, they can contribute out of their passion and belief in the NPS mission but I do NOT want their logos, their names and their boasting as part of my NPS experience. Please do not let the NPS get commercialized.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 277

Author Information

Keep Private: No
Name: Jacqueline
Organization: National Park Service
Organization Type: I - Unaffiliated Individual
Address:
Honolulu, HI 96818
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for updating DO #21, and thank you for putting it out for concurrent public and internal comment. This has meant a great deal to parks and their friends groups: to be able to discuss partnership as partners. That said, these comments are my own and the friends groups with whom I have worked while this document was being developed are providing their own comments separately.

As a park superintendent, I am extraordinarily supportive of the framework that has been developed in this updated Director's Order. It strikes the proper balance between working within the funds provided to parks through Congressional appropriation and identifying appropriate means by which to leverage public support for our mission.

DO #21, for the most part, outlines very clear ethical boundaries and delegations of authority. The shades of grey which do exist will, one expects, be explored and clarified in RM-21 and through the philanthropic competencies and skills training certification program (Section 3.1.4). This training is very much welcomed, and I cannot express enough how brilliant an idea it is to send key partner staff to the same training that's attended by their park superintendent. This deeper understanding and appreciation of each other's organizational and ethical cultures is instrumental to success. While it appears that this training will only be required for authorized NPS employees to whom a higher threshold for accepting donations will be delegated, I would hope that some version of the training will also be made available to those superintendents to whom no delegation is made, and that key staff from their friends groups may also attend with them. It would also be ideal if this training were required (or very strongly encouraged) to occur within the first year of a superintendency so that the park superintendent and the partner organization are able to establish a clear understanding of roles and ways to succeed together in the partnership. Basic competencies should also be introduced as part of the New Superintendent's Academy.

It would be ideal for there to be clarification in Section 3.1.11 that superintendents can in turn encourage key staff, as appropriate, to serve as NPS subject-matter experts to provide context and content as the partner solicits donations. For example, the chief of resource management would be an ideal person to have in the room along with the park superintendent when discussing donations targeted toward the preservation of key park resources.

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In general, I support everything outlined in Section 4. Thank you for the clarity that donations may be used to fund or otherwise support any NPS activity for which appropriated funds could be used (Section 4.2). In particular, thank you for providing a mechanism by which donations can be utilized to support permanent NPS employees through an endowment from which payment of salaries is a stated purpose.

It is excellent to see modern means of fundraising (such as electronic donations and crowd funding) included in this document.

One area of concern that many parks have is the perceived competition between the National Park Foundation and 'local' friends groups, particularly on park websites; it would be ideal if this could be more closely managed so that friends groups do not feel that they are being denied opportunities to support their partner NPS unit(s) because the NPF gets to those opportunities first.

While it is understandably somewhat controversial, I support the proposal to allow the NPS to permit philanthropic partnerships with / acceptance of donations from corporations that produce or distribute alcohol, consistent with vetting procedures (Section 5.1). I also support the continued prohibition on accepting donations from producers of tobacco or illegal products (it should perhaps be noted that in Section 4.3, the second bullet under item b should use the word 'or' rather than 'and, which implies tobacco is illegal when it is not; this is done properly in Section 5.1).

I would suggest that the prohibition on accepting donations from certain entities be strengthened to include a prohibition on accepting funds from sources which:

A) have a demonstrated track record of illegal activities (particularly when it comes to breaking laws meant to protect the environment),

B) corporations who contribute significantly to greenhouse gas emissions without significant efforts to offset their footprint, or

C) corporations with whom close association would otherwise be contrary to the core mission of the National Park Service. For example, accepting donations from oil companies does not seem appropriate, until such time as these companies demonstrate a commitment to identifying alternative sources of energy that do not negatively impact our planet.

Authorized NPS employees would be greatly supported in their ability to say 'no' to such entities if clear guidance to do so is outlined in policy.

In general, I support the remainder of the document (Sections 6-8) and have no significant concerns. In particular I embrace the concepts of donor recognition and sponsorship which allow significant donors to be recognized while still maintaining the integrity, independence, and aesthetic character of our national parks. It is excellent to see the NPS stepping into its second century with a savvy commensurate with not-for-profit institutions of preservation and learning.

One possibly omission: it would be ideal to address the providing of access by a friends group to NPS staff in exchange for a donation. For example: at a fundraising event, the friends group may have an auction item to take a hike in the park which is led by a program manager, subject matter expert, or the superintendent. It would be ideal to have guidelines for the appropriateness of such arrangements and, perhaps akin to what's outlined in Section 8.5.2, that such arrangements be made only at donation levels commensurate with park budget and philanthropic campaign goals. In general I support such access; it leads to better public and corporate understanding of the NPS and its resources, and has historically been a method of engagement dating all the way back to Stephen Mather. It would be ideal to have this clarified in DO #21.

Thank you for the opportunity to comment, and for everyone's work on this document.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 278

Author Information

Keep Private: No
Name: Cynthia
Organization: Atomic Heritage Foundation
Organization Type: I - Unaffiliated Individual
Address:
Washington, DC 20006
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The Atomic Heritage Foundation (AHF) appreciates the opportunity to comment on the Director's Order #21: Philanthropic Partnerships and respectfully submits comments on three issues. Thanks very much for your consideration.

Strategic Philanthropic Partners

The first issue concerns Strategic Philanthropic Partners (section 6.2.3). By definition, these are partners that have a cooperative agreement or cooperative association with the National Park Service. For a Strategic Philanthropic Partner, the options for entering a philanthropic agreement are limited to a one-year agreement renewable for up to three years.

Given the amount of time required to enter into an agreement, it may be desirable to have a longer-term option for Strategic Philanthropic Partners. Even increasing the limits to two-years renewable for up to five years would be helpful. Ideally, these agreements could be extended for even longer terms at the discretion of a Regional, Associate or Assistant Director. Otherwise, organizations with cooperative agreements may be discouraged from investing in donor cultivation and launching multiyear fund-raising campaigns.

Intellectual Property

The second issue involves Intellectual Property (section 6.3). The last sentence of this paragraph states, "Upon termination of an agreement, all developed intellectual property will conveyed to the NPS." If an organization has "background intellectual property" and creates "developed intellectual property" under an agreement, does this provision mean that all of the intellectual property is conveyed to the NPS? If not, then does the "background intellectual property " created by the organization remain its intellectual property and the remainder developed under the agreement becomes the intellectual property of the NPS?

AHF recommends adding a clause that allows for some negotiation. For example, the last sentence could read: ""Upon termination of an agreement, all developed intellectual property will conveyed to the NPS unless otherwise provided by the Director, Regional Director or other responsible NPS official."

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Otherwise, organizations may be discouraged from entering an agreement to develop interpretive or educational resources that unconditionally become the intellectual property of the National Park Service. In some cases, the organization may be responsible for raising the funds as well as developing the project. In some cases, the intellectual property may continue to be maintained and made available to the public on the organization's website. Having some provision that recognizes these and other possibilities would be helpful.

Suggestions for In-Park Recognition

The third issue concerns Suggestions for In-Park Recognition (Section 8.5.2). In the last paragraph, naming of interior spaces, exhibits and presumably other interpretive and educational resources is limited to five years. For newly established parks, this could be an impediment to attracting donors. Some suggest that the minimum to attract seven figure donations for a new visitors center, for example, could be on the order of several decades not years. A determination of the appropriate length could consider the duration of naming rights that other federal or charitable entities currently offer.

AHF suggests an amendment to allow for appeals to the Director, Regional Director or other National Park Service official to increase the duration of the naming rights beyond five years after considering the circumstances. For example, the NPS could extend the time period for such donor recognition if a facility would not otherwise be built because of lack of funds. The park could be in an economically distressed, low-income area where the prospects of raising substantial sums from other individuals or charitable entities are remote.

Other considerations might include the size and purpose of the gift. How will the National Park Service benefit? How have similar visitor centers or other projects been funded? Is the donor a foundation or an individual as opposed to a corporation or corporate foundation? These and other fact-based considerations should guide the duration of the naming rights beyond the proposed limit of five years.

The Atomic Heritage Foundation appreciates the hard work that went into the revised Director's Order #21 and agrees with most of it. Thank you for considering our comments on these three provisions.

Sincerely,

Cynthia
President

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 279

Author Information

Keep Private: No
Name: Jennifer
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Langhorne, PA 19047
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear NPS Leaders.

I am writing to encourage you to not allow corporate sponsorship of our beloved National Parks.

My family and I treasure our National Parks, Monuments, and Historical Parks immensely. We love to camp, hike, and view wildlife and birds. We tremendously value the peace, rejuvenation, solitude, and inspiration that the wilderness provides. We value the experience of standing in places where the natural history and the human history of our land was made, and imagine what it might have been like to be there in that time. We have made indelible memories with our son in Denali, Yellowstone, Badlands, Saguaro, Grand Canyon, all the red rock parks of southern Utah, Yosemite, Acadia, and so many more, and we look forward to making more memories in Glacier this summer.

One of the aspects of our travels to these spectacular and significant places that is truly meaningful to us, is the authenticity of the experience that comes from a sense that one is in a place unlike any other. That the place "feels" like "itself" fundamentally is what makes it so unique, and valuable. Allowing corporate sponsorship, and the resulting commercialization and development that would ensue will denigrate the integrity of our nation's parks and monuments, and force them into the same homogenization that plagues the everyday places of our everyday lives.

We go to our National Parks, Monuments, and Historical Parks because they are NOT part of the everyday. They are each someplace special and unique. Please, do not allow these places to be bought and exploited by corporations!

Respectfully,
Mrs. Jennifer

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 280

Author Information

Keep Private: No
Name: Michael
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Grand Canyon, AZ 86023
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for making available the draft version of Director's Order 21 and allowing the public an opportunity to comment. Partnerships and philanthropy are undoubtedly an important part of the National Park Service's future. Because NPS has worked hard to foster positive relationships with park partners, the open and protected status of our public lands enjoys greater certainty than it otherwise would.

I also appreciate NPS' willingness to further develop its relationships with philanthropic partners. Many elements of the proposed update to DO-21 are reasonable and necessary to keep pace with the changing landscape of fundraising. For example, it makes sense to explicitly allow crowd funding campaigns, at least by nonprofit park partners. However, several elements of the proposed update to Director's Order 21 represent an unwise step toward the unnecessary commercialization of public spaces. There is no need to open up our park units to the additional presence of corporate logos. The Park Service itself states the case on its website:

"Most institutions that attract significant donations insist on equity in recognizing corporate gifts alongside individual and foundation gifts by using the same typeface and not displaying the donor organization's copyrighted script or logo. This affords equal recognition for donors and avoids corporate branding or the perception of commercialization. This is the direction that the NPS has chosen based on concerns that parks remain a refuge from corporate branding which is otherwise so pervasive in our society. This still leaves many opportunities for vital corporate partnerships in support of parks."

source: https://www.nps.gov/partnerships/donor_partner_corporations.htm

The text is clear: There are still "many opportunities for vital corporate partnerships" without opening the door to a flood of logos. The increased presence of corporate logos in our parks will invariably cause a perception of commercialization.

The new version of DO-21 represents an extreme departure from this philosophy. Although the existing version of DO-21 allows corporate logos and name script in credit lines, it also includes clearly defined limitations on where and how these

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credits may be displayed. Under the old version of DO-21, corporate logos and name script may not appear on kiosk casings, as digital graphics or overlays present in the main body of a presentation, or on signage that persists after work has been completed on a project. Corporate logos and name scripts may not appear on any donated or donor-funded items.

The proposed text jettisons all of these restrictions. Corporate branding could appear on "temporary" signage that persists for years after the completion of a construction project. It could appear as an intrusive graphic or a persistent watermark visible throughout the entirety of a digital media presentation. It could appear on the body of an informational kiosk. It could be emblazoned on donated items and donor-funded items.

These sensible restrictions should remain intact in the new version of DO-21. Please amend the updated version of DO-21 to retain the existing limitations on the display of corporate logos and name script.

The naming of interior spaces and other park facilities is another step in the wrong direction. The 2008 version of DO-21 specifically prohibited such naming rights. The proposed version of DO-21 represents a 180-degree about-face from that prudent restriction. It is simply impossible to avoid the perception of commercialization when visitors are directed to a (hypothetical) "Anheuser-Busch Theater, located within the visitor center."

These are common spaces owned by the American public and open to the world. They should not be named after corporate sponsors. Doing so erodes the public's ability to understand that our national parks are held in equal measure by and for all of us. When the public loses sight of this truth, the long-term viability of our national parks is compromised. Parks and park facilities should not be perceived as beneficent gifts from a magnanimous few.

The public perception of the Park Service's integrity is susceptible to further erosion when a donor with naming rights is involved in scandal or corruption. Indeed, the proposed version of DO-21 specifically allows the Park Service to accept donations from (and therefore grant naming rights to) entities that NPS or DOI is litigating against.

Imagine the perception the public would have had if, fifteen years ago, they visited an "Enron Learning Center" in a national park. There is precedent for this kind of PR disaster: In 2002, the Houston Astros paid \$2.1 million to buy back the naming rights for what was then known as Enron Field. Under a worst-case scenario, you could have an "American Lands Council Welcome Kiosk" within a visitor center while at the same time the ALC is suing the DOI or NPS over land-use or land-ownership issues.

I urge NPS to continue its existing policy which forbids the naming of rooms, features, or park facilities as a form of donor recognition.

I also urge NPS to reverse course on their willingness to accept donations from parties that are fighting the Department of Interior or any DOI agencies in court.

NPS should also reverse course on their willingness to accept quid-pro-quo advertising agreements. Such agreements are explicitly authorized in section 6.5 of the proposed update to DO-21:

"Financial Support-a financial sponsor pays a set amount of money in exchange for benefits outlined in a sponsorship agreement. Examples of benefits include an advertisement or mention in event programs, NPS or philanthropic partner newsletters or press releases; signage; or logos on promotional materials."

These agreements seem to be prohibited by 36 CFR 5.1:

"Commercial notices or advertisements shall not be displayed, posted, or distributed on federally owned or controlled lands within a park area unless prior written permission has been given by the Superintendent. Such permission may be granted only if the notice or advertisement is of goods, services, or facilities available within the park area and such notices and advertisements are found by the Superintendent to be desirable and necessary for the convenience and guidance of the

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public."

Any advertisements - and there can be no doubt that naming rights and a quid-pro-quo agreement for logo display are indeed advertisements - would seem to fall afoul of this regulation. Any notices and advertisements must be both desirable and necessary for both the convenience and guidance of the public.

Even when logo recognition is desirable, it is not strictly necessary. And I can imagine no case where public convenience and guidance are both served by the display of a corporate logo within a park unit.

If the public loses trust in the integrity of NPS and its leadership, the organization will begin its next century of service with an uphill battle to preserve our public lands. Please do not take any steps that would erode public confidence in the Park Service - the revisions to DO-21 have received little press, but almost all of it is negative. As press coverage continues to grow, it will invariably become more negative as the details of this revision become better known.

The legislation that allowed changes to donor recognition was tucked away at the end of the 2015 National Defense Authorization Act. At what point in the legislative process was this added to the NDAA? Suppose that it was inserted at the last minute without meaningful debate. Would eleventh-hour legislative sleight-of-hand inspire public confidence in the good-faith actions of the Park Service?

And although it explicitly provides for certain types of recognition, it is not even clear to me that section 3054 of the 2015 NDAA actually authorizes NPS to recognize donors with room naming rights. Indeed, it explicitly forbids "naming rights to any unit of the National Park System or a National Park System facility, including a visitor center." There is nothing to indicate that Congress intended any exceptions to this prohibition.

Are rooms and displays within a visitor center or other building not also facilities in and of themselves? The theater at a visitor center is a theater facility. An interpretive exhibit is an educational facility. A broom closet is a janitorial facility. (It seems clear that the "Rubbermaid Broom Closet" would be an example of a facility naming that Congress intended to forbid.) A quick Google search for the phrase "room facility" will confirm that the use of the word "facility" is commonly used by English-language speakers to refer to interior spaces. If there is any doubt, consider the fact that "facilities" is often used as shorthand to refer to restroom facilities, which are generally located in interior spaces. The point here is that the prohibition on NPS "facilities" is not limited strictly to building names.

The appendix to the revised version of DO-21 contains definitions for important terms. However, the word "facility" is missing from the definitions list. The appendix should include a definition of "facility" that is consistent with its common use: "space or equipment necessary for doing something," and "an amenity or resource."

Finally, it is worth considering the draft version of DO-21 in relation to the recommendations from the National Park System Advisory Board report "Toward a New Era of Philanthropy and Partnerships." The report identifies four areas for improvement, including "increasing diversity and inclusion." I can find nothing in DO-21 that appears intended to address this issue. DO-21 should include language that encourages NPS to create and foster partnerships that will increase minority representation among park visitors, volunteers, donors, and other stakeholders. It should also direct NPS to periodically undertake a review that evaluates the success of such efforts, or to perform that evaluation as a part of diversity reports that are already planned.

I am sincerely thankful for the Park Service's ongoing efforts to increase stakeholder diversity. I understand that outreach coordinators working at various park units are working to improve visitor diversity, and I know that there is also a high-level commitment within NPS to fully represent the ethnically and culturally diverse nature of the American public.

Because NPS takes these concerns seriously, I suggest that decision-makers carefully consider the implicit messages that may be broadcast if corporate logos are allowed to proliferate. Consider that park visitation is disproportionately white, and that the generosity of prospective corporate partners might correlate with their customers' tendency to visit parks. Under such a

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scenario, park units might see a proliferation of logos that underrepresent the interests of minority consumers. Visitors might misperceive an implicit message that national parks are not or should not be important to minority consumers.

I understand that our national parks are desperately underfunded. I understand that our parks have an enormous backlog of deferred maintenance. But the value of the public perception of the Park Service far eclipses the dollar value of this much-needed maintenance.

The new version of DO-21 focuses far too much on sweeping changes and quid-pro-quo arrangements that erode the public's goodwill toward NPS. Substantial revisions need to be made, and they need to focus on sensible implementation of incremental changes. I previously mentioned the explicit allowance for crowd funding projects by park partners. This is a great idea - but shouldn't it be spelled out in greater detail? What if only a mere three percent of net revenue from a crowd funding project was donated to NPS? There need to be guidelines in place that allow the Park Service to define what is actually a helpful project, and what is in essence an excuse for a corporate donor to affix their reputation to that of the Park Service.

Thank you for the opportunity to submit comments, and thank you for their consideration. I look forward to seeing what changes are brought as a result of public involvement, and I am optimistic that the final version will be better because of it.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 281

Author Information

Keep Private: No
Name: Edmund
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bethesda, MD 20817-3350
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I appreciate the opportunity to submit comments on the proposed revision to Director's Order #21.

The revision is an understandable effort to respond to an era of extreme underfunding of the National Park Service by encouraging greater donations from non-governmental sources. While such support has long benefited the National Park System, it entails recognized risks: undue corporate influence; damage to NPS independence and to public confidence in the service's integrity; and commercialization of the park experience.

Individually, some of the proposed changes appear to be reasonable enhancements of NPS' ability to attract support, conclude timely and beneficial agreements, and provide appropriate recognition to donors. Taken as a whole, however, the proposal may be too easily perceived as encouraging a trend toward dilution of the NPS role as an official protector of natural and historical assets. Especially problematic is the tone of the committee report, "Toward a New Era of Philanthropy and Partnerships," which appears to assume that today's reality requires public officials to court and accommodate the increased influence of corporations and philanthropists.

I suggest that the new DO #21 include additional reminders that NPS officials operate under congressional mandate and are ultimately responsible to the public, rather than to private interests. The revision should provide stronger guidance to managers in using their new flexibility in ways that avoid the risks of too much deference to donors' desiderata. Some provisions need additional explanation, while others should perhaps be modified or dropped. For example, the draft prohibits NPS "[e]ndorsement of a business, brand, product, service, or enterprise;" however, it does not explain how such endorsement is to be avoided in agreements that involve advertising campaigns. Another questionable provision allows NPS marks and logos to be licensed for "co-branding" in commercial advertising, so long as only a one-dimensional version of the arrow head logo is involved. This seems to mask a potential cheapening of the NPS identity under a meaningless distinction.

Other changes to the proposed revision that merit consideration include further stipulations to: protect superintendents from pressure to deliver fundraising; add limitations on naming opportunities to ensure that they are fully compatible with NPS

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objectives; and draw distinctions between partnerships with commercial enterprises and those with non-profit organizations.

Thank you for your consideration.

Sincerely,

Edmund
Bethesda MD 20817

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 282

Author Information

Keep Private: No
Name: michelle
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Moab, UT 84532
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I believe that the NPS should lean towards the original mission statement, which is protect and conserving the environment and nature. Not to change it to adjust to "human needs or desires". Please keep commercialism out of the park service. It ruins the entire view of a ranger in the community's eyes. We would be apart of big corporations when visitors view us and that is not the goal. Please lets keep true to the mission statement meaning, especially in this centennial year celebrations!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 283

Author Information

Keep Private: No
Name: William
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Denver, CO 80238
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I vehemently oppose Draft Director's Order #21 as proposed by the Director of the National Park Service to allow corporate sponsorship within our National Parks. While it is undeniable that major underfunding by Congress over decades has caused National Parks to fall into their terrible current state of financial crisis, the commercialization of them has no place in our Parks' restoration or future.

A Park Service spokesman has stated, regarding this policy:

"It's about aligning [the parks and private companies] with the values of authenticity" the Park Service represents, Reinbold said. "The American narrative."

I strongly argue that the "value of authenticity" a private company holds has nothing to do with the values on which our National Parks were created and represent.

And, it is indeed a tragic statement that "The American Narrative" now means our National Parks' legacies being given open-handedly by the Park Service to Corporations whose bottom line purpose is to make money. And does this apparent new paradigm of the "American Narrative" also mean that the only way to attract young and diverse visitors, as the Park Service states as a critical need for survival, is plaster product placement in front of their faces? We see that everywhere we go in today's fast paced life. A National Park is supposed to be a place to be free from that type of environment, not condone and promote it.

This policy also promotes and encourages Park Superintendents to become active in fundraising and donor recognition. I would put forward that if this is to be a responsibility of Park Superintendents then we should remove the title "Superintendent" and replace it with "Park Marketing Manager."

This is a BAD idea. Commercialized sponsorship has no place in our National Park system. If nothing else, please let us retain at least ONE place in our lives where we are not slaves to rampant commercialism.

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PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 284

Author Information

Keep Private: No
Name: Will
Organization: National Park Foundation
Organization Type: I - Unaffiliated Individual
Address:
Suite 200
Washington, DC 20005
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

May 16, 2016

Director Jonathan B. Jarvis
National Park Service
1849 C Street NW
Washington, DC 20240

Director Jarvis:

Since 1967, the National Park Foundation (NPF) has served as the official charity to the National Park Service, chartered by Congress to "further the conservation of natural, scenic, historic, scientific, educational, inspirational, or recreational resources for future generations of Americans." Over the years, NPF - and the entire philanthropic community - have seen their role in the stewardship and protection of our nation's public lands grow as a result of decreased federal funding and annual budget shortfalls for the Park Service.

Thanks to recent leadership within the Park Service, however, NPS has made tremendous strides in adapting to this difficult and changing fiscal landscape so that its work preserving iconic landscapes and telling the American story can continue uninterrupted. The Service's ability to evolve and embrace the realities of a 21st century financial climate, and provide more opportunities for private philanthropy to support our parks has been truly remarkable, and we - your philanthropic partners - laud the progress made to date.

Nowhere is this progress more evident than in the most recent revision of Director's Order #21: Donations and Fundraising (DO21), the internal policy that governs the relationship between the Park Service and philanthropic entities and practices. The current draft released for public comment this spring represents a measured but vital advancement for NPS as it looks to

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increase park philanthropy and meet the growing needs of its partners and, more importantly, the American people. Furthermore, it effectively incorporates and reflects many of the changes and recommendations provided by the 2014 National Park System Advisory Board's Toward a New Era of Philanthropy and Partnerships, a group of stakeholders and subject matter experts assembled to advise and guide this re-writing process.

The National Park Foundation sees the revised DO21 as an important step forward in the improvement of our national parks - one that recognizes the contemporary needs of NPS and its partners. The recommendations and comments included here represent the official response from the National Park Foundation and are intended to fine tune and improve upon the revisions included in this draft, not detract from the progress made to date. We offer our thanks and congratulations to the National Park Service - and, in particular, the Office of Partnerships and Civic Engagement - for their hard work in drafting this document and their commitment to ensuring our parks will be enjoyed for future generations.

Sincerely,

Will
President
National Park Foundation

Draft Revision of Director's Order #21
National Park Foundation Public Response

The following comments and recommendations are presented according to the contents and structure of the revised draft of Directors Order #21: Donations and Fundraising (DO21) and reflect the formal response from the National Park Foundation (NPF). We welcome the opportunity to further aid in the revision process as well as the creation of the accompanying Reference Manual that will help interpret this policy at a national level.

SECTION 1. BACKGROUND AND PURPOSE

POLICY ADVANCEMENTS

- The revised draft does a laudable job in providing valuable historical and modern-day context for the role of philanthropy in the National Park Service. While the audience for the DO is limited to Park Service employees, it rightfully recognizes the need for private citizens to engage with and steward the protection of these places.
- NPF supports the inclusion of such forward-thinking language as "...NPS policies and practices for philanthropy must also evolve" (13-14), that recognize the changing landscape of a modern philanthropic environment.

AREAS FOR IMPROVEMENT

- While NPF recognizes the need for NPS to oversee and manage the formal partnerships they engage in with philanthropic partners, we find the following language to be overly restrictive and not reflective of the nature of public-private partnership:

"However, the NPS may enter into written agreements that authorize others to conduct fundraising on its behalf and, through such agreements, exercise some control over private parties' fundraising activities" (19-21).

While we appreciate and understand that NPS has a responsibility to ensure that fundraising activities done on their behalf adhere to appropriate standards and regulations, we recommend that the final policy revise this language to more accurately

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reflect what should truly be a collaborative process - not one that indicates oversight of independent, non-profit organizations by a government agency or its employees.

SECTION 2. AUTHORITIES

POLICY ADVANCEMENTS

- The major revision in Section 2. Authorities is the removal of Section 2.2 Solicitation of Donations which has been rewritten and moved to the following Section 3. Roles and Responsibilities (see comments below). NPF agrees with the decision to keep the focus of this section on the authorizations of NPS to engage in philanthropy in accordance with prior legislation.

SECTION 3. ROLES AND RESPONSIBILITIES

POLICY ADVANCEMENTS

- NPF believes this section rightly recognizes the inherent role philanthropy plays at every level of the National Park Service. Regardless of park size and/or budget, NPS employees should be encouraged to gain a stronger understanding of how their work is funded and the growing need for diverse streams of funding.

- Without question, NPF supports the revised language that both encourages and empowers NPS employees to "...express support for the authorized fundraising efforts of philanthropic partners" (121 - 122). The philanthropic community has always viewed NPS as our most important partner - one that impacts the success of our work on a day-to-day basis - and this language recognizes the role NPS plays in allowing partners to achieve in their goals.

- NPF supports extending the rights to solicit gifts and fundraise to the Director level. As a member of the National Park Foundation Board of Directors (see below), it is of paramount importance that the Director be permitted to solicit gifts on behalf of NPF, per the official bylaws that govern our board.

AREAS FOR IMPROVEMENT

- NPF has concerns regarding the following language:

"As a matter of policy, NPS employees may not serve as officers - either voting or nonvoting, or as ex-officio board members - of any authorized NPS philanthropic partner or cooperating association that raises funds to benefit the NPS." (129-131)

Currently, both the Director of the National Park Service, as well as the Secretary of the Department of Interior, serve as voting members of NPF's Board of Directors. These roles were designated by NPF's founding charter and legislation, voted on and approved by Congress. While the pending National Park Service Centennial Act (H.R. 4680) would move their roles to ex-officio, nonvoting status, this would still be in direct conflict with DO21 guidelines.

NPF recommends either removing this clause entirely, or providing an exception/waiver for their congressionally chartered charity so as not to contradict current law or pending legislation, which would supersede this policy.

- While NPF applauds the DO's language clarifying acceptable fundraising activities that NPS employees can engage in (i.e. responding to inquiries, identifying the authorized fundraising efforts of philanthropic partners), we hope these newly outlined permissions serve to benefit the philanthropic community rather than usurp their role as primary fundraisers for NPS. Park partners are uniquely positioned to cultivate, solicit and steward philanthropic gifts in a way that NPS as a public entity cannot do. While we wholeheartedly support the spirit of this section, we recommend deeper clarification so that NPS

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employees recognize the important role of their park partners.

- NPF seeks further clarification on the following in which authorized employees must:

"Consider additional concerns raised by donations:

- made to a nonprofit entity or philanthropic partner with the intent that the donation will benefit the NPS" (168-170)

It is unclear how and when a gift can reasonably be considered to benefit NPS. For instance, unrestricted donations to a philanthropic partner whose sole mission is to support the park system could still be considered under this category. If this is the case, it is in direct conflict with Section 5.4 Review of Contributions to Partners in which the policy states:

"Donations made to a philanthropic partner to support their administrative and operational costs are not subject to NPS donor review policies." (740-741)

If unrestricted donations or donations that support operational costs are not subject to review policies then we recommend this clause be modified or removed.

- NPF has concerns regarding the following in which authorized employees must:

"Review and approve all informational materials about a proposed donation, proposed solicitation, or fundraising campaign before their distribution." (183-184)

This clause overlooks the frequency in which non-profit organizations develop mass appeals and solicitations that can be sent electronically, through direct mail, or via social media. It is unrealistic for NPS to review and approve any and all asks that take place to the members or subscribers of authorized park partners. We recognize that appeals to donors in which funds are directed to support a specific project or program must be approved by NPS in order to ensure deliverables and accurate usage of funds, however, this is not what the current policy outlines. We recommend this clause be revised so that it is not interpreted broadly to all communications and campaign appeals developed by park partners.

- NPF seeks clarification on the meaning of "philanthropic agreements" in the following clause:

"The Director or a Deputy Director must approve philanthropic agreements for philanthropic activities that will benefit the NPS..." (221-222)

If the "philanthropic agreements" refer only to the formal authorized agreements between NPS and their authorized philanthropic partner, then no additions are required. However, if these agreements extend to contracts between for-profit companies and philanthropic partners, then NPF respectfully requests that this clause be altered. In order to ensure confidentiality for donors, NPF has a strict policy of not sharing formal agreements with the National Park Service - to do so would make these contracts available to public inquiry. NPF asks that the language around approval of philanthropic agreements address this issue as it would greatly impact the ability for non-profit partners to engage private entities in formal funding agreements.

- NPF enthusiastically supports the inclusion of the following:

"Although NPS employees may not solicit donations, superintendents are encouraged to participate with philanthropic partners in 'donor cultivation' meetings with prospective donors. In these situations, superintendents serve as the NPS subject-matter experts and may provide helpful content as the partner solicits donations." (344-347)

However, NPF recommends that we extend this right to any NPS employee that oversees a particular program or project, so long as they receive approval from their Superintendent to attend such a meeting. For philanthropic partners to better solicit and secure funding for these projects, we need the expertise of NPS staff in order to better communicate to potential donors

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the nuances of a given project. We believe this section could benefit from more explicit language around the importance of having NPS staff members provide job and project-specific information to philanthropic partners in order to secure funding for NPS-identified priority projects.

SECTION 4. PHILANTHROPIC SUPPORT

POLICY ADVANCEMENTS

- Overall, the revisions within this section more accurately reflect the diversity of support that is provided to NPS and its partners (Section 4.1). Be it monetary or in-kind donations, supporters of our national parks have no shortage of ways in which to give back. The variety of giving means listed here show a clear recognition by the Park Service of the emerging trends in philanthropy and donor-centric giving.
- To that end, NPS also acknowledges the important role corporate partners play in the stewardship of our national parks. While there has been no shortage of controversy surrounding corporate partnerships and the Park Service, the reality is these partnerships have been occurring for quite some time in a variety of capacities. National programs like Open Outdoors for Kids and the White House's recent Every Kid in a Park initiative have enjoyed philanthropic support from corporate entities whose support has proven vital in the delivery of these services.

The changing political climate has meant that the basic financial needs of our national parks are not being met. Therefore, it is imperative that NPS and their philanthropic partners be creative and resourceful in finding alternative ways to finance and support our national parks. NPF resoundingly supports the revised DO as it accurately captures this need and the importance of partnership-based philanthropy to fill the financial gap facing our parks.

- NPF supports the inclusion of Section 4.6 In-Park Fundraising as it creates greater ease for park visitors to support the resource while visiting. Additionally, it allows park partners the opportunity to better communicate the needs of the Park Service.

That said, NPF requests greater clarity on what is and is not included under the banner of "in-park fundraising efforts" either within the policy or the forthcoming Reference Manual. More specifically, we would like to determine whether or not canvassing by park partners would be acceptable within park boundaries.

AREAS FOR IMPROVEMENT

- As mentioned above, NPF applauds the inclusion and recognition of more modern approaches to gift giving. That said, NPF believes there are a few key methods that are either not included or require more clarification either within this document or the forthcoming Reference Manual. These include:

- o Charitable Gift Annuities: While charitable gift annuities can be an incredibly beneficial way for both donors and charities to give and receive donations, they carry an inherent risk that is not captured in this current document. Most organizations - and certainly government entities - should not accept charitable gift annuities due to the real financial burdens that can sometimes be levied upon the charity.

- o Crowdfunding: We believe this is a great inclusion; however, there must be more clear guidelines around how crowdfunding platforms and processes can and should operate at the local and national level. NPF is happy to work with NPS on developing these guidelines for the Reference Manual when the time comes.

- o Electronic Donations and Emerging Practices: (See below)

- o In-Kind Giving: While NPF recognizes that important and value of in-kind donations, we strongly recommend that the Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

pending Reference Manual provide more in-depth guidelines and clarity around what types of goods and services are appropriate (i.e. budget-relieving) and parameters that ensure any accepted in-kind donations does not obligate NPS to any future expenses that aren't already funded.

o Peer-to-Peer Giving: Currently the most effective and popular giving strategy - particularly for younger donors - is the peer-to-peer giving model. Unfortunately, this philanthropic model is not mentioned within the new DO despite being an emerging form of modern-day philanthropy and engagement.

- In a prior section, the revised draft indicates that NPS will:

"Review and approve all informational materials about a proposed donation, proposed solicitation, or fundraising campaign before their distribution." (183-184)

Section 4.3 takes this approval process a step further and indicates that all NPS-authorized fundraising campaigns must:

"Have NPS review and approval of campaign-related informational materials before distribution." (471-472).

Given the sheer quantity of fundraising activities occurring across the system by park partners, NPF recommends this language be tempered as it is unlikely that NPS will have the bandwidth and capability to review all campaign-related materials.

- Section 4.6.3 Checkout Counter Donation Program is a re-envisioned version of what was previously the Guest Donations Program. Under this clause, authorized checkout programs conducted by concessioners and cooperating associations would be required to send collected funds to NPF for disbursement.

While NPF recognizes the need and importance for NPS to track donations like these at a national level, in order to administer these fees NPF would need to recover minimal administrative costs. While the new revision indicates that NPF would be permitted to do so, a change would need to be made to the Secretarial Order to reflect this. NPF has agreed the administrative fee applied to these funds would be substantially less than what we traditionally charge for restricted fund management given the nature of this program and the desire to maximize philanthropic benefit to park partners.

Additionally, NPF recognizes that cooperating associations operate as philanthropic organizations themselves. The current structure of passing funds through NPF back to a philanthropic partner would require an unnecessary burden on both cooperating associations and NPF. We recommend that they be exempt from this authorization process pending the development of a more robust process designed specifically to track programs operated by cooperating associations.

Given the importance of tracking donations made through checkout programs, NPF is happy to work with NPS and official park concessionaires and cooperating associations to find appropriate solutions that meet the accounting and reporting needs of a successful checkout donation program.

- NPF has concerns regarding Section 4.7 Electronic Donations and Emerging Practices in which the revised document states:

"Park superintendents should encourage online giving to their philanthropic partners and may accept direct donations via their parks' websites. Parks with direct online donation capabilities can place notices to inform the public about these donation opportunities." (596-598)

Under this provision, NPS would be able to set up online giving platforms directly on NPS.gov. Given the inability for NPS to steward donors in a meaningful and effective way, we see this as contrary to philanthropic best practices. Additionally, it could create donor confusion when there is a philanthropic partner in place. We recommend that if a direct giving platform is incorporated on NPS.gov it be clearly linked to the authorized philanthropic partner (with only one partner selected per park and clear identification for the donor). NPF recognizes that not all parks have partners that can solicit or accept gifts on their

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behalf. We recommend in that case the donor get directed to the National Park Foundation.

- We have addressed the issue above regarding the "approval" of partnerships with corporate entities. In Section 4.4 Corporate Partnerships this issue is raised again and suggests that any formal agreements would need to be reviewed by NPS prior to execution. We respectfully ask that the new DO directly indicates that this does not include a review of formal contracts due to donor privacy.

SECTION 5. DONOR REVIEW

POLICY ADVANCEMENTS

- NPF enthusiastically approves of the clause allowing philanthropic partners to accept donations from concessionaires and for-profit entities that have current or prospective commercial use authorizations (CUAs). NPF has been lucky enough to partner with and receive funding from a variety of national-level concessionaires who support vital programs that support our national parks.
- As a proud partner to the National Park Foundation and supporter of the National Park Service Centennial and Find Your Park campaign, Budweiser has proven immeasurably valuable to us in our work. Therefore, NPF applauds the lifting of the ban on corporations that produce and distribute alcohol. We appreciate the need to "test-run" this prohibition lift with the Find Your Park campaign and feel that over the past two years there have been no major drawbacks or concerns with partnering with such entities. Rather, these partnerships have provided inroads to younger, more diverse audiences and supported fantastic philanthropic initiatives across the system.
- We appreciate the inclusion of the following clause:

"Donations made to a philanthropic partner to support their administrative and operational costs are not subject to NPS donor review policies." (745-746)

This clause recognizes the distinction between donating directly to a separate, 501c3 organization as opposed to a government agency. That said, administrative and operational funding for organizations that support NPS could reasonably be considered aid to NPS. Therefore, we ask that the terminology be adjusted to reflect "unrestricted funding".

AREAS FOR IMPROVEMENT

- NPF has concerns regarding the timeline and lifecycle of a vetted donor. Section 5.3 Process for Vetting Direct Donations states the following:

"The NPS will evaluate a prospective donor every fiscal year that the donor offers a donation....This applies to both one-time and phased donations made over one or more fiscal years." (700-703)

While NPF is happy to submit donors to NPS on an annual basis, we have concerns that the capacity of NPS to vet said donors in a timely and efficient manner may be stretched. NPF has previously been notified that there is a limit to the number of donors they can submit for vetting on a monthly basis. With these current vetting thresholds and procedures, we fear there may be a large influx of donors submitted to NPS for approval.

SECTION 6. PUBLIC PRIVATE PARTNERSHIPS

POLICY ADVANCEMENTS

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- The revised draft shows a more streamlined and effective approach to managing partnership relationships, something that NPF supports. This new, more consolidated approach to partnership stratification is a clear indication that NPS is recognizing the increasingly diverse services and operations their park partners managed. Organizations no longer operate as purely philanthropic entities - rather they conduct retail operations, oversee projects, run education programming, and more. The revisions made to this section clearly show that NPS has made substantial progress in recognizing this shifting trend in the work their park partners do.

- Through our work with NPS with the Centennial licensing program and the Find Your Park campaign, we applaud the inclusion of brand guidelines and policies for the Park Service and their associated marks.

AREAS FOR IMPROVEMENT

- While NPF appreciates the revised stratification of partner levels - particularly since many of these levels take their cues from our recent National Park Partners: Status and Trends report released earlier this year - we feel that some of the criteria included in Section 6.2 Philanthropic Agreements, may not be feasible for all non-profit partners. As a Congressionally chartered partner, our agreement will remain unchanged by this revision; however, we encourage NPS to consider the recommendations made by the larger partner community as they look to refine the criteria in this section.

- NPF has concerns regarding the following clause in regards to what Philanthropic Agreements should contain:

"Philanthropic agreements may authorize non-project, NPS-related fundraising activities such as annual or membership campaigns, donor cultivation events, planned giving events, crowdfunding, and grants." (795-797)

We see this level of specificity far too granular to include in a philanthropic agreement, particularly since many of these activities should not require NPS approval as they speak directly to the operations of a separate 501c3 organization.

SECTION 7. PARTNERSHIP DESIGN AND CONSTRUCTION PROJECTS

POLICY ADVANCEMENTS

- We commend NPS on their recognition of the importance of design competitions, as well as the role partners often play in the oversight and execution of design/construction projects on park grounds.

AREAS FOR IMPROVEMENT

- NPF has concerns regarding the following footnote:

"Cost-Share Funding Programs (such as the Centennial Challenge Fund Program) may require the transfer of partner funds to the NPS."

While NPF recognizes that federal funds are intended to go directly to government agencies for oversight and accountability reasons, given that park partners are often the entities responsible for implementing projects or programs funded by these Cost-Share program, there will need to be an opportunity to waive this requirement.

SECTION 8. DONOR RECOGNITION

POLICY ADVANCEMENTS

- NPF offers our full support of the revised Donor Recognition policies outlined in this draft revision. We, along with our Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

park partners, believe that donor recognition is an important part of the philanthropic process. Through this document, NPS has outlined policies that maintain the integrity of our national parks while providing partners the ability to recognize the people and organizations that make so much of our work possible. We believe these revisions - which include recognition on vehicles, pavers and park furnishings - bring NPS into the 21st century while reflecting the best practices already underway at similar institutions like museums and public universities.

- We appreciate and support the many improvements to Section 8.5 In-Park Donor Recognition. Many of the policies outlined here are a result of the work NPF has conducted with NPS through the ongoing Find Your Park campaign. We believe this has served as a valuable model for how recognition in parks does not hinder the visitor experience, but rather serves to highlight the fantastic work of our supporters and partners.
- NPF supports the continued prohibition of the usage of name scripts or logos on permanent park furnishings as we believe it does not align with the mission and spirit of the National Park Service. In no way are our national parks "for sale" and we believe this document continues this communal sentiment that we all espouse. Additionally, as we have seen time and time again, our corporate partners recognize that any suggestion that historic places could become commercialized not only harms NPS, but also the brand value of the corporate partner as well.
- In-park fundraising events are incredibly valuable and important to partners looking to cultivate donors and provide them with an immediate connection to the resource. NPF applauds the inclusion of in-park events not only as valuable opportunities for donor engagement but also as a means to recognize private contributions made to our national parks.

AREAS FOR IMPROVEMENT

- While NPF wholeheartedly agrees that every national park should have a donor recognition plan or policy in place, we ask that the language be altered to reflect that these plans should be developed in partnership with their philanthropic partners. Park partners will likely have a better understanding of the needs and desires of park supporters which will help inform superintendents as they develop appropriate spaces and means to recognize these donors.
- Within Section 8.5.2 Suggestions for In-Park Recognition NPF has concerns regarding the following clause under Naming of interior spaces in facilities:

"The naming opportunity should be at a level commensurate with the park budget and fundraising campaign. Naming is limited to a period of five years...The final gift must be sufficient to cover operation, maintenance, and lifecycle costs of the named space." (1184-1189)

While we recognize the need to not provide naming rights to interior spaces in perpetuity, we believe that the current five year limit is too short given the requirements of a donor to cover the operation, maintenance and lifecycle costs of said space. We respectfully request that the limit on interior space naming rights be increased in accordance to the requirements of the gift.

CONCLUSION

The National Park Service Centennial marks a new chapter for America's national parks - one that will carry with it no shortage of challenges and opportunities. As we usher in the next one hundred years of our mission and work, it is up to the Park Service and its partners to adapt and evolve in ways that will allow us to provide the necessary support to our country's most treasure spaces.

With that in mind, the National Park Foundation offers their support and congratulations to the National Park Service for their incredible work and dedication to revising Director's Order #21 during this Centennial year. The revisions and changes made to this policy are not a radical shift in the way that National Park Service and its partner will operate - rather they

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represent the natural evolution of our work and the philanthropic trends we see in today's world. We look forward to continuing our incredible partnership with the National Park Service and providing the American people and its parks the support and funding they need for the next one hundred years.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 285

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bedford Hills, NY 10507
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am in complete disagreement with this proposal. It will deface our national property.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 286

Author Information

Keep Private: No
Name: Julie
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Geneva, IL 60134
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
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Correspondence Text

In this era of government corruption and de facto corporate ownership of many public institutions, to the detriment of the general public, I cannot imagine a worse time for such a proposal to be implemented by the NPS or any government agency. The NPS, hat in hand, seeking financing for parks infrastructure and enhancements, would inevitably be the lesser "partner" in the arrangements proposed.

If this proposed order were implemented, what types of quality controls - specific and stringent - would serve to screen which corporate "partners" would be allowed to impose their logos, brand names, etc. in the national parks? I note a Subaru van with the NPS mark somewhere in the information I gathered in order to write a few comments. Suppose it had been a Volkswagen? Mitsubishi? The scandals instigated by the giant auto makers in rigging emissions testing results in the United States certainly would militate against the image NPS presumably wants to cultivate. And, of course, they broke the law. Does the specter of giant corporations flagrantly undermining the public interest upset anyone any longer, or are we to look the other way because they have written or may write us a big, fat check?

Is the NPS so concerned with uncongenial federal budget priorities that it needs to seek outside funding for parks? While I do not know the details and am in no way an expert on hitting up Congress for money, I do know that the recent sunset on LWCF and resulting expiration of funding was of great concern to both the Democratic and Republican Senators here in Illinois. Aside from extreme anti-government politicians, representing a small, radical constituency that wants to privatize public land for their own financial enrichment, most of the rest of us value and appreciate our public lands and national parks and can live with the idea of the commons just fine. Should the NPS not be appealing to the public for support of its mission, rather than seeking sweetheart deals with self-serving corporations that need to pile on goodwill on account of their bad behavior?

What about companies that don't pay any corporate federal income tax and hold state and local governments hostage for tax abatement and other favors not remotely available to small businesses or individuals? Would they get to partner with our national parks, too?

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And what about the National Park Foundation? Has it ceased to operate? Isn't the activity proposed here what the foundation was created to accomplish?

Private philanthropy is wonderful if it's delivered with a dose of humility. The national parks have been preserved and have thrived for 100 years because of countless, sometimes nameless individuals who have served the mission of the NPS selflessly and with great dedication. Is their service now to be supplanted by fundraising activity and schmoozing the well-heeled?

Sincerely,
Julie

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 287

Author Information

Keep Private: No
Name: james
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Durango, CO 81301
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
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Correspondence Text

Thank you for taking my comment and incorporating it into your decision-making. It is widely known that the NPS is deficient on funds for many important needs that have not need adequately supported by Congress. That said, it is my perception and observation that the USDA's USFS and DOI's BLM are financially in even dire straits due to inadequate funding, so relatively speaking the NPS is "doing okay" and as I think is generally know the NPS gets a better and bigger bite at Congressional funding than many other public land agencies.

So, does the NPS need more funds - definitely "yes!" And how to get it? As a former NPS concessionaire and a person who follows NPS concessions activities I believe strongly that the fees charged to concessionaires as a % o their sales is entirely too small. NPS lands and all they have to offer are a benefit to the public in many ways and to pay for the mgmt. and upkeep of the Parks the public is responsible. Either the public funds come through Congress or more directly through a % o monies made by companies operating in the Parks as businesses/concessions. These businesses make significant process while benefiting COMPLETELY form public-owned lands, therefore it is very just and reasonable that they should step-up (which will need to be required by the NPS) to pay hire fees for the monetary benefits they receive from their business operations that are WHOLLY dependent on our common heritage. These outfits have been "freeloading" for way too long - bump up their "contributions" to NPS funding, it's long overdue!

Thanks, J.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 288

Author Information

Keep Private: No
Name: Gary
Organization: Partnership for the National Trails System
Organization Type: I - Unaffiliated Individual
Address:
Madison, WI 53703
Madison, WI 53703
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
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May 16, 2016
Jonathan B. Jarvis, Director
National Park Service
1849 C Street, NW
Washington, DC 20240

Dear Director Jarvis:

I am writing on behalf of the 35 nonprofit organizations comprising the Partnership for the National Trails System that partner with the National Park Service, Bureau of Land Management, and U.S. Forest Service to protect, develop, and sustain America's 30 National Scenic and Historic Trails. Collectively our trail organizations provide more than 1 million hours of volunteer labor annually to sustain the National Trails. The value of that labor and the financial contributions made by these organizations for the trails each year is more than 125% of what Congress appropriates to the federal agencies to administer them.

We strongly support your intention through Directors Order #21: Donations and Fundraising (DO21) to significantly increase collaborative public/private philanthropy throughout the National Park System and the various programs of the National Park Service. We greatly appreciate the opportunity to review and comment on the draft of DO21. We have joined with many other organizations in signing onto a joint letter led by the Public Lands Alliance that offers extensive comments about many of the provisions in the proposed DO21. While we concur with the recommendations included in those comments we have several additional concerns with the draft DO21 that we ask you to address.

Philanthropic Partners

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

First, none of the categories of Philanthropic Partners included in Section 6.1 of DO21 adequately describes the collaborative relationships our trail organizations have with the Park Service to develop and sustain the National Scenic and Historic Trails. We recommend adding a category of "Managing Partner" to include organizations or entities that collaborate with the Park Service to provide essential long-term management of public resources as authorized by law or administrative decision, such as the management of National Scenic and Historic Trails.

MANAGING PARTNER RELATIONSHIPS FOR NATIONAL TRAILS

By authorities in the National Trails System Act (16USC1241) and thru long term agreements, 501c3 nonprofit trail organizations collaborate as "managing partners" to develop, protect, and sustain the 23 National Scenic and Historic Trails administered by the National Park Service (and the 7 additional National Trails administered by the Bureau of Land Management and the Forest Service). In this role of managing partner these organizations provide a wide range of services including building and maintaining tens of thousands of miles of trail; recruiting, training, and managing tens of thousands of volunteers; raising funds to acquire lands for the trails; executing programs and events; advocating for resources for the trails within IRS published limits; engaging local, regional, and state government agencies to help manage sections of the trails; and otherwise continuously seeking additional sources of funding, in-kind help, and material resources to develop and sustain the National Trails. In most cases these nonprofit partners contribute significantly greater resources to the collaborative management of these National Trails than the National Park Service is able to provide. Unlike traditional national parks, quite literally most of the National Scenic and Historic Trails would not exist as opportunities for public recreational and educational benefit without the work of these nonprofit "managing partners." This collaborative public/private shared management has been practiced quite successfully for decades in the National Trails System.

As collaborating partners, the National Park Service administers the National Scenic and Historic Trails thru numerous agreements, while the nonprofit "managing partner" manages its National Trail thru agreements with many partners, as well. Some of these agreements with other federal agencies, state and local resource and cultural agencies, regional and local land trusts, and other nonprofit organizations are three-way agreements including both the Park Service and its managing partner. Some management agreements are solely between one of the collaborating partners and another entity. These partnerships recognized through the various agreements are usually intended to be long-term relationships based upon mutual interests and trust. A considerable amount of the management of the National Trails is involved in nurturing and sustaining this myriad of essential partnerships supporting each trail.

While many of the provisions of DO21 are applicable to the public/private partnerships that sustain the National Scenic and Historic Trails the language does not adequately describe the nature of those partnerships and the absolutely essential role played by the principal private sector partner and other partners to develop and sustain the public resource. The various short term philanthropic agreements outlined in DO21 are inadequate to guide long term, continually ongoing fund raising and other resource gathering needed to sustain the National Trails. There should be some type of agreement, perhaps an addendum to the existing agreements that define the roles of the partners in sustaining the National Trails, that would be long term and clearly detail the expected participation of both the National Park Service and the nonprofit partners in continuously raising funds and other resources to sustain these National Trails.

Second, under Section 1. Background and Purposes, Subsection 1.1 Background, 3rd paragraph, (line20): The sentence currently reads as follows:

However, the NPS may enter into written agreements that authorize others to conduct fundraising on its behalf and, through such agreements, exercise some control over private parties fundraising activities. We think changing the phrase exercise some control over to exercise some influence in would be better in that sentence.

Third, in Section 5.4: Review of Contributions to Partners: The Park Service is requiring philanthropic partners to review donors. Considering this is about philanthropy, we think this terminology should be replaced with terminology used in the field of philanthropy - our trail organizations do not have a donor review process but they do have a gift acceptance policy that can be shared as part of the agreement process. The entire Section 5 is titled Donor Review, but its actually the NPS gift acceptance policy. Donor review sounds like a person must meet certain criteria to give a donation, but its the nature of the Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

gift that is being evaluated, not the person.

Fourth, in Section 3.1.4: Philanthropic Competencies and Skills, Line 215 references a training and certification program that will be available to key partner staff. We enthusiastically support this intention and look forward for our organizations to participate in these joint training opportunities. We also support the intent of Line 382, recommending that philanthropic partners should obtain accredited philanthropic competency training and certification, but would not support making this a mandatory requirement for collaborative fundraising with the National Park Service.

Fifth, while we generally support the additional opportunities provided in Section 8: Donor Recognition to recognize philanthropic gifts within the National Park System we are concerned about protecting the quality and integrity of the National Scenic and Historic Trails from what can readily be viewed as "commercialization." Like the National Parks each of the National Scenic and Historic Trails has a "nature and purpose" recognized by law that is intended to guide the development, use, and protection of that trail and its associated natural, cultural, historic, and scenic resources. A critical practice of philanthropic partnerships between the National Park Service and our trail organization "managing partners" should be to ensure that the National Trails remain true to their intended "nature and purposes." Wilderness trails must remain free of reminders of civilizations and historic sites must be given respectful treatment that helps evoke the setting of their historic use. Donor recognition policies and practices need to be sensitively followed to assure people using National Trails that they will not be bombarded with advertising. Decisions on the appropriateness of the placement and nature of donor recognition on or near National Trails under Park Service jurisdiction should be jointly made with the "managing partners" trail organizations.

Thanks again for the opportunity to participate in helping to shape this revised directive. We look forward to working with Park Service staff to significantly increase the philanthropy that we can collaboratively cultivate to sustain the National Trails System.

In partnership,

Gary
Executive Director

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 289

Author Information

Keep Private: No
Name: Bill
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Drexel Hill, PA 19026
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I have grave reservations over the changes to the Philanthropic Partnerships section of Director's Order 21. My concerns are as follows:

- It is dangerous to begin accepting corporate money to fund park operations, particularly the maintenance backlog, as it may give Congress an excuse to make further cuts to park funding by citing that the parks are getting the money elsewhere. They have a history of doing just that with the Fee Demo program.
- The money could very easily dry up as corporations are not duty bound to fund anything. If a corporate entity has a bad year, they will serve their bottom line before their promise to fund parks.
- I am deeply concerned that corporations will request, or demand services in return for their donations that may be harmful to the resource. I am thinking of the whole Dasani water fiasco at Grand Canyon. It is true Coca-Cola did not get their way, but the big danger is that the NPS may some day give in to corporate demands if they threaten to take away funding.
- I have many other concerns, but probably my biggest problem with this whole scheme is that it just seems immoral to me. The parks are pure. They belong to We the People. They are funded by the People for the enjoyment of the People and the preservation of the People's heritage. And despite what the Supreme Court says, corporations are not people.

It will be a sad, sad day if I ever step into one of our beloved National Parks and I have to see a sign that says that a trail, or

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

that a visitor center, or the Liberty Bell is brought to me by Budwiser or something like that. Corporate logos have already found their way into the parks with the Find Your Park signs, and it literally makes me sick.

I could go on, but my comment, I fear, has already turned into a rant.

I beg you to please reconsider the changes to Director's Order 21.

Thank you for your consideration.

PEPC Project ID: 60882, DocumentID: 71886 Correspondence: 290

Author Information

Keep Private: No
Name: M
Organization:
Organization Type: I - Unaffiliated Individual
Address:
San Carlos, CA 94070
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I oppose the idea of partnering with major corporations to allow them to put their names on auditoriums, buses, benches and whatnot. Our national parks are one of the last vestiges of nature, of uncommercialized landscapes that we have left. Our children, and ourselves, are bombarded with advertisements and corporate logos continually. Can't we preserve these commercial free spaces?

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 291

Author Information

Keep Private: No
Name: Dawn
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Garden Ridge, TX 78266
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I don't like advertising signs on buses or benches. A wall specifically designated for corporation donors is sufficient. Also, if the Park is going to allow corporate donors, then more fines need to be given out and higher fines for people that do not follow the rules of staying away from wildlife. The extra money the NPS will receive will allow it to hire more Rangers to give out tickets. And these corporate donors SHOULD NOT be allowed any special privileges. They should be giving to the NPS out of the goodness of their corporate hearts, not expecting anything in return.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 292

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
LA, CA 90291
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Folks:

Just got back into the big city after a visit to Yosemite National Park; already the issues involved with corporate sub-contractors providing services in the National Park system are blatantly obvious there. I am referring to the NPS recent changing of contractors to run the venues there, as well as in King's Canyon, wherein the old contractor has laid claim to the "rights" to the names of old and established places like the "Wawona Hotel" . . . such that now, the place built in 1876 or so, way before the previous contractor even existed, has to now refer to itself as "Big Trees Hotel" . . . and the historic "New Ahwahnee Hotel" now has some other nomenclature selected for bureaucratic reasons

Really, it is clear that there is already "incursion" into our public National Park system . . . this "new" approach seems similar to removing the "Dodd-Frank" protections . . . because the "bankers can regulate themselves w/o issue." Please keep corporate "sponsorships" out of our public lands

Fritz

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 293

Author Information

Keep Private: No
Name: Ray
Organization: NPS-PWRO
Organization Type: I - Unaffiliated Individual
Address:
San Francisco, CA 94104
San Francisco, CA 94104
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Line 413-414 Again for profit corporations are cited before our traditional non profit partners suggest you reorder.

Line 421 expand Intellectual Property examples - Works of art can also be tangible personal property - As described not very instructive and this is a topic least understood by NPS staff.

Line 423 Change to read: "designations, etc..")

Line 426 Add NPS IRS Tax-exempt number.

Line 429 Change to read: "...and the contribution including the amount of any cash contribution. The cash value of non cash contributions is determined by the contributor and IRS."

Line 445 Change to read: "standard NPS planning..."

Line 465 Change to read: "or up to \$5 million, the..."

Line 475 Change to read: "corporations, can play..."

Line 479 Change to read: "corporate partnerships, sponsorships and cause related marketing campaigns must be" (It would be better to have corporate sponsorship and cause-related marketing agreements and call them that rather than group them under strategic partnership agreements")

Line 506: Change to read: "with a corporation at a park, regional or national level must be..."

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Line 517: Change to read: "and activities. In addition, people who volunteer their time often elect to also become park donors."

Line 529: Change to read: "needs and ways to donate to the park or support the park through donating to the park's authorized.."

Line 539: Change to read: "public's awareness and understanding of the role of the partner..."

Line 543: Change to read: "in a fundraising agreement..."

Line 545: Change to read: "issued an appropriate special park use permit..."

Line 561: Change to read: "or NPS leased facilities..."

Line 574: Change to read: "authorized NPS lodging..."

Line 577: Change to read: "at a park lodge..."

Line 583: Change to read: "...program within park boundaries."

Line 589: Should add a paragraph: Partners may also negotiate such programs with businesses that operate outside the park boundaries in gateway communities and beyond with donations going directly to the park or the park partner to support park needs."

It would be good to offer advice on including opt in for donors to receive additional info on ways that can assist the park.

Line 590: Suggest deleting "and Emerging Practices" which is vague

Line 592: Change to read: " donation boxes, but are online or through kiosk and computer screen displays.

Line 594: Change to read: " their park's websites."

Line 620: Change to read: "give valuation or tax advice."

Line 642: Change to read: "tobacco, alcohol abuse, or any type..." (We are allowing alcohol sponsors but should draw the line on alcohol abuse).

Line 643: Change to read: "that are inappropriate, inconsistent..."

Line 648: Change to read: "may" rather than "will"

Line 675-677: Unclear what this means and how temporary or term personnel would inappropriately influence actions or decisions.

Line 696: Change to read: "to:(1)..."

Line 735: Change to read: "Philanthropic Partnership Agreement..."

Line 763: Change to read: "has cultivated or intends to cultivate a long-term..."

Line 768: Change to read: "known as a park "Friends Group""

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Line 784: Change to read: "an effective, efficient..."

Line 788: Change to read: "for alignment, communications.."

Line 807: Change to read: "made substantial investments in a..."

PEPC Project ID: 60882, DocumentID: 71886 Correspondence: 294

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Hull, MA 02045
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/16/2016	Date Received: 05/16/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

I repectfully request that entrance fees are raised slightly before considering our national parks buying, naming and raising the entrance fees beyond what individuals and family can afford.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 295

Author Information

Keep Private: No
Name: Earl J. New
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Langhorne, PA 19047
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear NPS,

I am writing you today to ask you to please not proceed with the proposed philanthropic partnerships.

I travel the National Parks with my family. I save up my vacation time, and we take grand road trips every other summer to visit all of the National Parks, Monuments, etc. in a specific state or geographic region. We camp, hike, fish, bird watch, and look for other wildlife as we explore the parks, and really get to know them in a deep and meaningful way.

These trips have afforded us many vivid and cherished memories of time well spent together. And when we return from these trips, our stories and photos inspire others to do the same.

If the NPS starts entertaining the offers of corporations to fund initiatives in exchange for naming rights, development rights, or whatever else, the integrity of the parks will be lost forever, their value will be diminished, and their protection and preservation threatened.

Our parks and monuments are incomparable to those of any other country; truly treasures that should never be exploited. Please do not allow corporations to gain a foothold within our wild and historic public lands.

Thank you.
Mr. Earl

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 296

Author Information

Keep Private: No
Name: Phil
Organization: NatureBridge
Organization Type: I - Unaffiliated Individual
Address:
San Francisco, CA 94108
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Jonathan B. Jarvis
Director
National Park Service
1849 C Street NW
Washington, DC 20240

May 16, 2016

Dear Director Jarvis:

We applaud you and the National Park Service team for the significant time and attention committed to revising Director's Order 21. We recognize the challenges that arise from the hybrid nature of non-profit organizations in the national park community - NatureBridge being just one example - and we appreciate the opportunity to serve on the Philanthropy and Partnerships Committee of the National Park System Advisory Board.

We see several areas of increased clarity and accountability in the revised policy and have signed onto the comments being put forward by the Public Lands Alliance in support of those "Key Advances." In addition to that collaborative approach, there are three specific areas, most relevant to our work, that are highlighted independently for your consideration: Strategic Fundraising Agreements, Donor Vetting, and Intellectual Property.

Strategic Fundraising Agreements

NatureBridge appreciated the opportunity to meet with Jeff Reinbold early in the DO-21 revision process. In that meeting we suggested that "Partnerships" rather than "Philanthropy" might be the common umbrella for revisions to Director's Order 21. We understand that Director's Order 20 is focused on Agreements, but given the present reality of the hybrid nature of

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partners, the construct of two separate Director's Orders may complicate these matters further. The revised Director's Order 21 defines NatureBridge as a "Strategic Philanthropic Partner" and states that a separate strategic fundraising agreement, with a duration of one year, will be used to authorize philanthropic activities by organizations that fall into this category.

The revised DO-21 uses the terms "agreement" and "philanthropic partnership agreement" inconsistently in lines 801 through 820 but in terms of the length of cooperating agreements, NatureBridge currently finds itself in a "Legacy Partner" status in the national park locations where we have long-standing operations and relationships with the park. We are proud of the shared vision and mutual trust that the National Park Service and NatureBridge have achieved to provide over 30,000 students each year with residential, environmental science learning in national parks.

To achieve this scale, we fundraise every day to provide scholarships to schools, sustain our operations, maintain and improve NPS facilities, and support research and evaluation in the field of environmental education. We are concerned that a separate strategic fundraising agreement with a duration of one year, instituted at each of our locations, would be an inefficient instrument and process and hamper our ability to deliver programs. We support the recommendations put forward in the Public Lands Alliance comments that would allow for an addendum to partnership agreements that bestows the privileges and responsibilities of a philanthropic partner, as a short-term solution, and the development of a master partnership agreement that can include a variety of provisions depending on the functions of the partner, as a long-term solution.

Donor Vetting

NatureBridge currently has one project-specific Fundraising Agreement in place with NPS and more could be envisioned if "strategic fundraising agreements" are pursued. For both current and potential future arrangements, NatureBridge is concerned that donor vetting by the agency would create an inefficient process unappealing to donors for the reasons outlined in the comments submitted by the Public Lands Alliance. We support the joint development of gift acceptance policies and think that this is the best practice to ensure that general and project-specific fundraising is agreeable to all parties.

Intellectual Property

Given the intellectual property language contained in the revised DO-21, it will be important to provide a framework and guidance for agency - partner discussions on what does and does not constitute "developed intellectual property" specific to the agency - partner relationship. NatureBridge partnerships extend beyond the NPS and those partners, like Institutes of Higher Learning, have their own expectations about intellectual property that is developed through our partnerships and relationships.

Thank you for considering the comments and perspective of NatureBridge. We are proud of our 45-year partnership with the National Park Service and the over one million students who have had the opportunity to live and learn in a national park. We are grateful for the dedicated employees of the National Park Service who work with us every day to ensure that our mission-aligned work endures. Please let us know if it would be helpful to discuss any of the points contained in our comments.

Sincerely,

Phil
President & CEO

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 297

Author Information

Keep Private: No
Name: Diane
Organization: NPS Midwest Regional Office
Organization Type: I - Unaffiliated Individual
Address:
Omaha, NE 68102
Omaha, NE 68108
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Directors Order 21 Comments
NPS Midwest Regional Office

General Comments

1) The new DO focuses primarily on philanthropy and new money coming to the NPS. This could be perceived by our existing partners and NPS watchdogs as a way of allowing the corporations/groups with the most money to have the most access to the NPS.

Even renaming this Directors Order Philanthropic Partnerships places a focus on only one aspect of what partners can assist the NPS with - money. For many of our partners, that it is a minimal part of what they bring to the table. The overall impression could be that the NPS is only interested in money from our partners.

2) The new options related to donor recognition (ex: using pavers with donor names, placing donor names on benches, allowing temporary room/program naming for high dollar donors, etc.) are generally positive, but the decision of when to use and not use should be at the discretion of Superintendents and regional leadership vs. WASO.

3) Seldom is the term Friends Group used in the document. These groups are lumped in with all other groups that could provide funds to the NPS. It isnt a positive change to cease recognizing the unique relationship that friends groups have with parks and recognizing that these groups bring much more than just money to the parks. We need to recognize this unique relationship within DO 21 and provide clearer direction on what Friends Groups can do that other partners or the public cannot (whats the benefit of being a FG and signing an Agreement?) We need more incentive for these types of partners.

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- 4) The DO is very general about most of the most significant changes and says that the details of those will be included within the new DO 21 Reference Manual (yet to be developed). This makes it very challenging when trying to understand how the changes in this new DO will be implemented. It also leaves the interpretation in danger of being more subjective than objective.
- 5) The DO introduces a new process for NPS staff and partners to obtain philanthropic certification to be allowed to approve donations and authorize fundraising campaigns at higher amounts. It doesn't reference whether those who don't obtain certification will be able to approve and authorize at lower levels, so it appears that everyone must accomplish the certification prior to approving or authorizing at any level. I suggest consider identifying certain existing non-profit trainings (on-line or in person or through a non-profit organization) be identified as sufficient for certification rather than design a new, separate course that will be very difficult to implement. Having levels of delegation match the amount of training needed might make this easier to implement.
- 6) The new DO allows the Director and both Deputy Directors to solicit donations. This is a huge concern to some of our friends groups and it could be perceived that decisions will involve favoritism on the part of the Agency leadership.
- 7) The DO identifies NPS as the eventual sole owner of intellectual property created by the partners (or by the NPS and partners together) while under an agreement. The DO allows the NPS and the partner to both have use rights while the relationship is in place but eventually the NPS becomes the sole owner as the agreement ends and/or the organization goes defunct (a reasonable option if the organization no longer continues to exist). This is an issue for existing partners because many create program names, program logos, etc. and then work with other partners on those same programs. They invest all the money and time in creating things that NPS then ultimately owns (but allows them to use, but not profit from). It seems more realistic to have a Licensing Agreement that will allow use by both the Partner and the NPS or some other form of agreement that allows for use by both the partner and the NPS.
- 8) The DO does not allow the use of the Arrowhead by any partners. Partners will now have to work with the NPS to use one of the secondary marks which aren't currently recognizable as the NPS). It will take a long time to establish the secondary mark. A separate clear policy needs to be developed for Arrowhead use (or at least complete DO 52D which is still in draft after MANY years&...) Partners who have an Agreement with the NPS should have some sort of access to the Arrowhead. The secondary marks limit the effect that the Arrowhead has when used by partners.
- 9) The NPS will not accept donations from tobacco companies, but it does allow donations from companies that produce alcohol. There still needs to be some clarification regarding the production of liquor products that offer a donation as part of the sale of products - this has a different public perception than a straight one-time or recurring donation. The RM will have to have more information on how this new allowance will be implemented. Interpretation might be difficult, but needs to be simplified and as clear as possible.
- 10) The new DO sets parameters for funding capital campaigns, such as visitor centers and other buildings. For example, the NPS will not allow name licensing of structures, which is commonly done for private enterprises, museum, colleges and other institutions. But it will allow for donor plaques inside a building and the naming of facets of the structure, such as a theater inside a building. The final decision on how this is done in the field needs to be clearly delegated with a simple, consistent process (that should not have to go higher than the RD or Regional Office Partnerships staff to make it time effective)
- 11) The rules also don't allow for employees to directly solicit donations, though they can identify projects that are in need of funds - which has been the practice in the past. The NPS director or deputy directors may solicit donations, directly or indirectly from private individuals or organizations for the NPS and its programs. How will the funding source and use of the funding be identified and solicited? Once again, this could be perceived as potentially involving some sort of favoritism, depending on how this is implemented. Smaller parks and projects will probably be overlooked in the process, once again giving the larger, well-known parks the majority of the benefit.

12) The NPS will also not take donations directly from concessioners or entities that are in litigation against the Park Service, though it may consider a donation if the suit is against another federal agency. Shouldnt there be some parameters on what type of suit was filed - is it okay if they damage resources in the USFS that would be the same sort of damage to NPS resources? Can we clarify that the type of lawsuit and the type of resource damage should be considered? Also, concessioners have been an important part of partnerships in some parks, so there should be some way to continue to partner with concessioners by placing parameters on that type of partnership rather than just not allowing it..

13) The order also provides a table as to who can accept what donation and how much.
A Park superintendent, for example, can accept a donation of up to \$5 million with delegation from a regional director and based on superintendents grade level, size of park budget, and philanthropic experience. How are all of these determined and is it the Regional level using guidance from WASO?

14) The new DO-21 also allows for various ways to raise funds inside of parks, from counter check-offs to donation boxes and crowd funding. With the funding going to NPF there needs to be some type of transition into this type of activity that doesnt alienate the groups currently benefiting from counter check-offs and donation boxes.

15) The DO has very little detail in areas that will be the most difficult to implement consistently and directs the reader to the Reference Manual for more information. In several of these cases, there isnt enough information to fully understand guidance for the new DO. (ex: 3.1.1. - NPS employees expressing support for authorized fundraising campaigns). The RM can help define a lot of these, but because most people reference the DO and not the RM, more information or parameters that could be in the DO, would help clarify policy for partners and parks, rather than relying on the RM to give direction on those things that can be better defined in the DO language.

16) Other types of partners, like Friends Groups seems to be combined with other one-time partners or partners that are only philanthropic (providing funding) to the NPS. Friends Groups have an important role in many of the parks and that relationship should be integrated into more places in the DO NPS friends groups provide so much more than funding and have been valuable in helping the NPS be successful in many other ways that shouldnt be minimized. The focus on philanthropy (in exclusion of the other benefits) and using the term philanthropic partner may give the perception that NPS is not as committed to other types of partnerships like Friends Group. There should be a section within this DO focused on friends group relationships and there should continue to be an agreement specifically for our relationship with these organizations. The concepts behind the Friends Group Agreement need to be carefully crafted into the new Philanthropic Support Agreement to not leave out partners who supply more than funding assistance. Since there is no draft agreement to review, the new Philanthropic Support Agreement needs to include how the park and the friends group will collaborate long-term (beyond the philanthropic aspects).

Specific Comments:

" Section 1.1

o This section should include language about general partnerships that provide other support along with fundraising activities. The fundraising aspect needs to be the focus of the policy, but recognizing other types of support and activities in the DO and providing guidance should be included. The entire DO tends to value money over other aspects of partnerships.

" Section 3.1.2

o The DO references that the Director and both Deputy Directors can solicit donations. The Director is a political appointee, but is there any authority to allow the non-political NPS employees to solicit and if there is no need for an authority, then maybe this ability should also be granted to the Associate Director for Partnerships and possibly other members of the WASO Partnerships Office? There might be a higher level of comfort if political appointees were not involved in the actual solicitation of funds.

" Section 3.1.3

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

- o What are the parameters on who needs this training, what the training is to accomplish (besides allowing the larger partners to do more with less oversight) and how much training is needed for the different levels of responsibility? There should still be a minimal level of authority allowed without the fundraising certification. Use the existing thresholds that allow anyone to presently accept and/or authorize donations/fundraising without any certification. Once again the smaller parks would have a higher burden than is needed.
- o In general, authorized NPS employees may assist philanthropic partners to achieve fundraising goals these NPS roles need much more clarification in the RM and need to be in concert with the actions that are clearly allowed in this DO as well as other related policy (i.e. parameters on accepting funds and participating in fundraising activities). Best efforts to clarify this will be needed - and will be challenging. It might be easier to be clear on what employees cannot do to help define this part of the DO.

" Section 3.1.4

- o Authorized employees must undergo a certification training. The expectations for this certification need to be realistic for all of our partners - even the less experienced or just smaller organizations. This certification must be realistic for all the different levels of delegation. Certification needs to be connected to the different levels of philanthropy. And making this certification more easily accessible for people in the field, as well as Superintendents and all Regional Directors will be more successful than a one size fits all approach. Other park personnel like Chiefs of Interpretation need to be able to get the training within reasonable expectations since they are likely the ones who work the closest with philanthropic partners. In general, the course should be no more than a few days and shouldn't require a ridiculous time commitment to encourage more NPS staff to get this information. In the future, some of this basic training could be included in orientation programs and leadership programs.
- o The other item that needs to be defined is what are options for parks that cannot do the training? What donation threshold are they allowed to accept and what fundraising authorization are they allowed to provide? There needs to be some threshold of authorities for those who don't take this training - at least for the period until they receive the training.
- o The other concern is what is expected of partners. The DO says that this will be available to partners but it doesn't say whether it is required or just optional. This should not be required, but have non-profit training more available to our partners to encourage the growth of their capacity.

o Will there be any provision for those NPS staff that have had previous successful philanthropic partnerships? Or is the consistency of the training more important than experience?

" Section 3.1.7

- o Coordinate partnerships that are national in scope, or involve parks and programs in more than one region - does this mean that partnerships that are now managed by other NPS programs (ex: RTCA, Healthy Parks Healthy People, Long Distance Trails, etc.) are managed by the Division Chief or only philanthropic partnerships that meet these criteria? I believe that this office should only manage a subset of partnerships that the NPS undertakes but should track the entire portfolio of NPS partnerships.
- o There are absolutely some national partnerships that should be managed by the Division Chief, but more importantly, there needs to be a clearinghouse that captures all the partnerships (philanthropic and otherwise) that are on-going within the NPS. This office could serve as that clearinghouse.

" Section 3.1.9

- o The Comptrollers Office and some participation from the Solicitors Office should also be represented on the NPS Partnership Council. In the past, having a contact in the Solicitors office has been valuable.

" Section 3.1.11

- o This section says that the annual work plan should guide the philanthropic goals and objectives. Annual work plan should identify all collaborative efforts that the park and the partner will undertake whether or not they are philanthropic in nature.
- o Should Superintendents be coordinating all philanthropic partnerships? Many parks have a designated employee, so maybe include those staff should be included here .

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" Section 3.1.12

- o The Partnership Council needs to be about much more than philanthropic partnerships and needs to try to engage more representation from other types of NPS partnerships for a larger perspective and to provide an opportunity for collaboration between divisions.
- o Non-philanthropic NPS partnership program staff need to be represented on the NPS Partnership Council so that the council can truly help advise on how to address partnership issues.
- o 12 members may be too small a group to include all of the entities that need to be included the number needs to be based on who should be represented, not on a random designation. The Partnership Council also needs to raise its profile and be more of a collaborative and policy oriented group. Currently it is mostly just an extension of the Regional Coordinators and WASO staff.

" Section 3.2

- o Only a very small portion of our existing friends groups raise substantive funding for our parks. An expectation for them to participate in the certification program is reasonable, but most of these groups will be able to undertake less substantive fundraising, so there should be minimal donation acceptance and fundraising levels that we should allow all of such groups to undertake without this training or with some other type of qualification. We can use the levels now established to cover the majority of our friends groups so that they do not have to undertake the training. If they decide that they will raise more funding and/or would like greater latitude, they could then take the required training.
- o accredited philanthropic competency training and certification
Not clear on exactly what this means. Are there professional standards that will be used or can we better define what this means for NPS personnel? For nonprofits, who would we expect to take the certification training? The executive director? The board chair? Most of our friends groups do not have staff so it would have to be the board chair - who is a volunteer. Even a short certification process would be an onerous expectation on our part.

" Section 4.3

- o Under c), the DO says that regional partnership coordinators must provide all agreements that authorize \$1 million or above campaigns to the Division Chief. But certified Regional Directors would be delegated authority for up to \$5 million. Under this scenario, would regions still need to provide this info to WASO for authorization? If we are trying to streamline processes that tend to take too long for partners to be effective, keeping delegations at lower

" Section 4.4

This section needs more details around the benefits of corporate partnerships and general expectations with them prior to going into much greater detail in each of the subsections of Section 4.4.

Is this meant to include just partnerships with corporations? This section needs renaming or better definition. This implies that the form of the business entity is key, rather than for- or non-profit status. But presumably this section would not cover our basic friends groups or other 501(c)(3)s-it seems to be meant to cover another type of business organization.

" Section 4.4.1

The Office of Partnerships and Philanthropy must approve the use of any NPS mark or logo. Can't this be handled at the Regional level with general guidance outlined by WASO and WASO can be included if Region has questions? This process can be time-consuming and usually results in the same decision the Regional Coordinator would have made about the use. Capacity at the WASO level has not been very consistent and this seems to be something that can be done usually at the regional level. (Once again finalizing DO 52D would be helpful for everyone&)

Is this meant to include just partnerships with corporations? This section needs renaming or better definition. It implies that the form of the business entity is key, rather than for- or non-profit status. But presumably this section would not cover our basic friends groups or other 501(c)(3)s-it seems to be meant to cover another type of business organization.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

" Section 4.6.1

Since partners will be allowed to raise funds within parks, does this mean that there is no prohibition related to a partner accepting funds on park property? Can philanthropic partners take payment for races/etc., items purchased at an auction, paintings purchased at park events within the park now?

o If we are allowing collection of funds within park boundaries, this is in direct opposition from the language in the Draft Policy Memorandum on Significant Restrictions or Closures of Park Areas to Accommodate Special Events which does not allow this activity. This inconsistency

needs to be corrected. This is a really important issue for partners, and there needs to be clearer direction on collecting money in parks.

o Must 100% o all donations collected by a park partner within a park go toward a park initiative, asset or program? This type of event is critical toward organizational sustainability and one of the best ways for our friends groups to raise funds for their organizational needs. If we dont allow them to raise funds for their own needs within the park, they will have a harder time becoming a sustainable organization.

o Could we clarify if releasing the names of donors/ donations made to partners is not covered in a FOIA? Or not needed?

" Section 4.6.2

o Does benefit the NPS include the philanthropic partner using some of the funds from a donation box to cover organizational expenses? Managing donation boxes is a time-intensive and costly responsibility for parks. We should encourage parks to have their friends group undertake this responsibility and we should allow them to retain some of those funds for their own organizational needs and to cover the costs of managing the donation box(es).

" Section 5.1

o NPS is to decline direct donations from tobacco companies, but the policy on drones needs to be clarified.

o Includes Tribal donations?

" Section 5.4

o Does this mean that philanthropic partners cant accept donations from tobacco companies or drone companies? If so, that needs to be clearly delineated within this section.

" Section 6.1

o This could be read to mean that, of this list, only individuals are required to have an agreement with the NPS. But all are required to have one, right? Maybe tighten up and move up to section 3? Or perhaps Philanthropic partners refers to any entity that has an agreement to to fundraise or otherwise generate donations on behalf of the NPS - including&

" Section 6.2

o In the 4th paragraph, the DO references that the agreement with the NPS will authorize annual or membership campaigns of the organization Partners should not need to obtain NPS approval to undertake these activities. If we are trying to say that the NPS needs to authorize these activities on NPS property, then we need to be clear in the language.

o I dont like these categories of partners; I dont think that this will be very attractive to our friends groups. I believe setting the basic period of agreements at 5 years is fine and then allowing Superintendents to decide whether to allow long-term, successful partners to go to 10 or 20 years. The ability to obtain a waiver for fundraising feasibility studies is very important, but think we should use our existing guidance and we should allow that decision to be made at the lowest level that is reasonable(based on the size of the fundraising campaign).

o The appropriate threshold is not defined. Sec 6.2.6 suggests that the regional director is the appropriate level - same approval level of waiver for premier partners. Needs clarification

" Section 6.2.4

o What expectations are there for how many corporate logos or signs or sizes of the logo are there? I assume that guidance will be provided in the RM, but some basic parameters would be helpful in the DO. We should use this DO to better define parameters than use the Ill know it when I see it exercises that can be too subjective or difficult when out of context.

" Section 6.3

- o The NPS does not need to own all developed intellectual property. NPS and the partner should negotiate on each item of IP as to who maintains ownership both during the relationship and after. There should also be some sort of perpetual licensing that can allow for shared use as needed.
- o The DO needs to include a better definition of intellectual property and the RM can identify examples of what falls into this category and what is not considered intellectual property.

" Section 6.4

- o I believe that it is a mistake to only allow partners to use the new NPS marks and not the Arrowhead. Use of the Arrowhead needs to be protected and monitored, but partners should have the ability to use the Arrowhead as long as they are under an agreement with us and follow NPS policy on its use. Its one of the only incentives the NPS can offer partner groups to work under our Agreements.

" Section 6.5

Sponsorship agreements - is this a different type / template to be determined? Or is this covered with the general agreement?

" Section 7

- o Change wording in the first paragraph. A partner would not need to have a Design and Construction Agreement in place if they only want to raise funds for the project. Since there is mention of the partner possibly operating the facility, it might be worthwhile to include mention of an Operating Agreement.
- o There should be at least 4 ways a partner can participate in constructing NPS facilities. Need to add - a partner could fund the project at 100% and only manage the design or the construction portions of the project.
- o What about a partner donating or working with others to have design and/or construction donated? We need some clear guidance on that model.
- o Since Partner Design and Construction Agreements are only needed for projects with a net costs of \$100,000 and greater, what instrument do you use (or do you need an instrument) when the partner is undertaking the design and/or construction on projects less than \$100,000? It would help to be clear here. What would be an easier instrument to use?

" Section 8.3

- o A new Donor Recognition Plan Template would be helpful, so there is a consistency and it can result in better understanding upfront.

" Section 8.7

- o Who authorizes use of logos/name script/credit lines (Superintendent or higher)? There needs to be a process that is efficient or guidelines that can be used at the Regional level. Leaving this to WASO takes too much time for our partners.

" Section 8.9.3

Is there a way that we can summarize what partner activity is / is not covered in an SUP? Maybe a chart or something simple would help parks and partners determine when an SUP can cover activities that otherwise might not be allowed.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 298

Author Information

Keep Private: No
Name: Robert
Organization: Friends of Fort Hunt Park, other organizations named
Organization Type: I - Unaffiliated Individual
Address:
Bethesda, MD 208914
Bethesda, MD 20814
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Jonathan B. Jarvis
Director
National Park Service
1849 C Street, N.W.
Washington, D.C. 20240

Re: Comments on Proposed Revision of Directors Order #21

Dear Director Jarvis:

Friends of Fort Hunt Park, Inc., Friends of Dyke Marsh and Citizens for a Fort Monroe National Park respectfully submit these comments on the proposed revised Directors Order #21 (DO #21). Our organizations are all small friends groups. Some of us are joining in the comments of the Public Lands Alliance, but we offer the following comments to address what we see as issues relating particularly to small groups such as ours.

We applaud NPS for undertaking this important update of its policies and practices relating to what are now to be called philanthropic partners, referred to in the current DO #21 as fundraising partners. We strongly support the objective stated by Director Jarvis in Policy Memorandum 14-04 of making partnering easier. While some improvements are reflected in the draft in that respect, we urge further improvements, as set forth in part below.

As found by the Potrero Groups Report to the National Park Foundation, National Park Partners: Status and Trends (the Report), 38% of all partners of NPS have less than \$50,000 in annual revenue and derive 71% of their annual revenue from individual contributions. These groups typically have all-volunteer officers and directors and no hired staff. The vast majority of NPS partners have annual revenue of \$1 million dollars or less. One conclusion of that Report was that it should be more

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widely understood that the partner community is not an even mix of emerging, small, medium, and large organizations. Id. at 28. We urge NPS to consider that a one-size-fits-all approach to DO #21 does not take into consideration the different burdens and hurdles even the draft revision still places on very small, all-volunteer partner groups such as ours.

We identify below specific issues to which we ask NPS to address further consideration, at least for emerging and small partner groups.

I. THE REQUIREMENT OF ADVANCE APPROVAL OF ALL FUNDRAISING MATERIALS WILL IMPEDE SMALL GROUP FUNDRAISING

This comment relates to these lines of the revision:

l. 182-83- - [Authorized employees must] -review and approve all informational materials about a proposed donation, proposed solicitation, or fundraising campaign before their distribution

l. 450, 471- - All NPS-authorized fundraising campaigns must . . . have NPS review and approval of campaign-related informational materials before distribution

While these provisions might appear useful to NPS in theory, they will impose considerable burdens in practice on small volunteer groups such as ours. Moreover, these requirements impose a considerable burden on the management of Park System units such as GWMP.

Our organizations have volunteer officers and directors and no hired staff. Our fundraising efforts are therefore generally implemented by volunteers, not by professional fundraisers or any professional employees. Many of these efforts are informal, one-time requests. A requirement that all informational material must be reviewed in advance by the park staff will stifle volunteer work on such materials and discourage groups from fundraising. Rather than being able to prepare and then immediately use flyers, posters, fundraising letters, email communications, website materials and similar materials, volunteers will need to prepare such items and submit them to NPS staff for review. Many groups have faced inordinate delays in getting responses from NPS on such materials, including comments, answers to questions, meetings or approvals. If it takes NPS 20 working days to respond, for example, that is the equivalent of about one month of delay in the ability to use the materials. Small organizations have by then lost the momentum needed to keep volunteers engaged, not to mention donations missed. And such organizations have lost the ability to act nimbly in carrying out a fundraising campaign.

This is not to criticize NPS staff for the delays. It goes without saying that NPS staff resources are already stretched thin. Two of our organizations are friends groups having relationships with the George Washington Memorial Parkway (GWMP) unit of NPS to support a particular park within that unit. GWMP management, for example, has a wide range of responsibilities and quite limited staff. Moreover, there are six different friends groups engaged as to different portions of GWMP, each with its own fundraising needs. One problem might be that it does not appear to be clear what NPS staff is looking for in conducting such reviews. Even were Revised DO #21 to state that authorized employees must conduct such reviews in a timely manner, as is stated for donor vetting (line l. 75) but not for review of materials, this would simply not be a practicable solution to the problem of delay.

We recognize that the Department policy requires in fundraising agreements that NPS review in advance all fundraising materials. 374 DM 6.9(B)(2). But even that policy effectively excludes small-scale events, defined as local or community based events not expected to raise more than \$25,000. 374 DM 6.9(C). Because no fundraising agreement is required for such events, the advance review requirement does not apply. But revised DO #21 has no such exception; the advance approval requirement applies universally, without exception even for small-scale events. NPS should therefore at the very least include such an exception in DO #21.

However, even if NPS needs to obtain the agreement of the Department of the Interior, NPS should do so to make exception for fundraising by small partner groups such as ours. This is a critical matter for effective fundraising by such groups.

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More generally, we urge NPS to find a different approach to assuring that fundraising materials are not in some manner objectionable to NPS. For example, NPS could identify the issues with which it is concerned and provide in the friends agreements that fundraising materials should not invoke those concerns, as well as being consistent with NPS goals. But at least small partners such as ours should not be required to burden their fundraising efforts with advance review of material.

II. THE REQUIREMENT OF 100% DNOR VETTING WILL IMPOSE UNNECESSARY PRACTICAL BURDENS ON FUNDRAISING

This comments relates to these lines of the revision:

I. 623 - - NPS will review (vet) all proposed donations or gifts, and their circumstances, before acceptance.

I. 731-39 - - Review of Contributions to Partners

I. 377, 387-88 - -[partners should] work with NPS in the review of propose donations, consistent with the donation review process outlines in Section 5

While the Revised DO #21 adopts a useful flexibility in some respects, the imposition on partners of the same donor review process as that applicable to direct gifts to NPS shows a lack of flexibility that needs to be addressed before adoption. We have several issues with this requirement.

First, for small organizations like ours with no hired staff and largely individual contributions, the review process imposes a substantial administrative burden. The vetting process requires a significant amount of inquiry. Fundraising of the type in which small groups such as ours generally engage involves a large number of individual donors rather than one or two large donors. Is the thought that our volunteers will need to make the required inquiries as to many small- and medium-sized gifts? If not, does NPS believe the staffs of parks such as GWMP have the time and resources to do so, despite their already overworked staffs?

Second, the proposed revision makes no distinction based on the amount of the contribution. Considerations and concerns raised by large contributions are simply not present in the case of individual contributions of \$50 or \$100 or even larger amounts. Even an individual contribution of \$1,000 to a partner presents little if any risk of the perception or reality that the donor is seeking to influence NPS on some personal issue or that something in the donors background might cause embarrassment to NPS. Indeed, in the absence of a gift large enough to warrant donor recognition by NPS, we see no reason why a friends groups should even need to identify its donors to NPS. But if NPS sees a need for such disclosure, the revised DO should provide only for vetting by large donors, setting a specific size that triggers vetting.

Third, donor vetting is not practicable under some circumstances. Modern fundraising involves use of websites and email and donation boxes. Some fundraising is conducted at events attended by a large number of individuals. In some of these circumstances, the gift has already been made before the partner even realizes who made the gift, if that information is known at all. In all of these circumstances, a vetting process will stifle donations.

Fourth, as to large donors, we are concerned that the vetting process and particularly the need for a certification for gifts above \$25,000 will put off prospective donors. If donor recognition is at issue, there might be a reason for vetting even for gifts, not to NPS, but to a fundraising partner. But absent such recognition, it is hard to see what risk NPS is running such as to justify impeding the solicitation effort by a long and perhaps intrusive or embarrassing vetting process for even large donors.

We therefore urge NPS to narrow significantly the circumstances in which donor vetting is required for gifts to a partner, at least as to small partner groups such as ours. No such vetting should be required for gifts to partners by individuals or by private foundations for which no donor recognition by NPS is requested. At the very least, no vetting should be required of

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gifts to partners of less than \$25,000 other than by commercial corporations.

III. THE ANNUAL WORK PLAN REQUIREMENT IMPOSES AN UNDUE BURDEN ON SMALL GROUPS

This comment relates to these lines of the revision:

l. 328, 333-35 -- [Superintendents will] develop an annual work plan with the philanthropic partner

l. 371, 372-73 -- [partners must] ensure that fundraising and other philanthropic activities follow approved . . . work plans;

l. 377, 379-80 -- [partners should] develop an annual work plan with the park superintendent . . . [which] will guide philanthropic goals and objectives

These provisions raise the question of what is an annual work plan. The forms used currently by NPS, in our experience, require the partner to devote considerable time and effort to complete and discuss with NPS. Moreover, there is little follow-up by NPS implementation of the plan. We question whether these forms have a corresponding utility to justify the time and effort, both on the part of the partner and on the part of the NPS. The form identifies separate projects; sets a budget for each project; identifies for each project how the partner will raise the funds, the source of the funding and the amount and the value of in-kind goods and services; and how the partner will vet donors. For large partners with professional staffs working with large and well-staffed parks, preparing such a plan might not be any burden. But for small partner groups such as ours, this requirement is a considerable burden. For example, for small partner groups dependent on small individual contributions, a prediction of how much money the group will raise each year is speculative. To require that the amount be further identified to particular projects in advance seems of little or no utility to NPS. Yet the time and effort required by our volunteer officers and directors to engage in such a detailed planning process is time that could have been devoted working to better the park.

In our view, the useful exercise in which the superintendent and such a partner group should be engaging, not only each year but on an ongoing basis as needed, is to agree on the parks needs and goals that should be funded by the partner. As the fundraising proceeds and amounts available become clear, the parties can decide priorities and implementation specifics.

Accordingly, we urge that, for small groups such as ours, this work plan requirement be made less formal. Among other things, it should be much less detailed. If parks and their partners have the kind of collaborative relationships which the Revised DO #21 seeks, they should establish a shared strategic goal and be permitted to decide between themselves what detail must be established each year in writing. An email exchange should be sufficient in most circumstances.

In addition, we urge NPS to make clear that superintendents are not expected to include in annual work plans for small groups like ours specifics concerning the fundraising sources and means to be employed. Again, no fundraising agreement is required under 374 DM 6.9(C) for small-scale events, the effect of which is that under Department policy, at least, NPS is not expected to approve the details of the partners fundraising plans for such events. But the concept of an exception for small scale fundraising should be extended to small groups more broadly. NPS training does not provide its staff with any expertise in fundraising practices. But more importantly, fundraising partners, or at least small groups such as ours, should be able to develop and continually evolve their fundraising efforts based on experience at any time during the year.

IV. THE REQUIREMENT FOR PHILANTHROPIC TRAINING AND CERTIFICATION IMPOSES ADMINISTRATIVE BURDEN ON SMALL GROUPS

This comment relates to these lines of the revision:

l. 377, 382 -- [partners should] obtain accredited philanthropic competency training and certification program

l. 211-12 -- partner professionals with responsibilities in philanthropic partnership initiatives must have core competencies and skills to undertake and manage successful philanthropic partnerships.

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Again, this requirement makes sense when applied to large partner organizations with professional staff. But the requirement ignores the fact, discussed at the outset, that 38% of partner groups are manned entirely by volunteers and have limited financial resources. As further explained in the report to the National Park Foundation, these groups are emerging and perform a role of considerable use to NPS. NPS should be encouraging and facilitating philanthropic training by such volunteers, but no such requirement should be imposed on people who want to assist NPS in ways financial and otherwise to deal with the challenges facing the National Park System in this Centennial year.

* * * * *

NPS does not often engage in fundamental revisions of policy of this nature. We again applaud the effort and the progress made to date in this regard. But we urge NPS not to miss this opportunity to make separate provision for small all-volunteer partner groups such as ours. If our fundraising is to be successful for the benefit of NPS, the issues raised above must be addressed in further revisions to DO #21 before it is finalized.

Respectfully submitted, FRIENDS OF FORT HUNT PARK

By: Robert, President

FRIENDS OF DYKE MARSH

By: Glenda, President

CITIZENS FOR A FORT MONROE NATIONAL PARK

By: Mark, President

Cc: Reginald Chapple,
Division Chief, Office of .
Partnerships and Philanthropy,
National Park Service
Jeffrey P. Reinbold,
Assistant Director,
Partnerships and Civic Engagement,
National Park Service

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 299

Author Information

Keep Private: No
Name: Patricia
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Essex Junction, VT 05452
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/16/2016	Date Received: 05/16/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Please do not spoil our national parks with commercialization. That is in opposition to why they were created.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 300

Author Information

Keep Private: No
Name: Brenna
Organization:
Organization Type: I - Unaffiliated Individual
Address:
West Linn, OR 97068
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I understand the need for more funding, but this is absolutely ludicrous to consider as a means to meeting the parks' needs. I can't see how this fits with the NPS mission. Covering our parks with banners and marketing on vehicles will not "preserve unimpaired" our valuable resources. As our natural and cultural places shrink, it is more critical than ever to practice preservation and conservation without the endless commercialization of our national resources. And to even think about allowing a corporation that is in dispute with the Dept. of the Interior to advertise themselves in our National Parks for good PR is unnerving. These are corporations deliberately harming the environment the NPS is supposed to protect, even if it doesn't happen to fall within their borders (this time). Please, do not allow our parks to be corrupted through these highly visible corporate rights. There is a better way.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 301

Author Information

Keep Private: No
Name: Board of Directors
Organization: Grand Teton Association
Organization Type: I - Unaffiliated Individual
Address:
Moose, WY 8312
Moose, WY 83012
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

May 16, 2016

Jonathan B Jarvis, Director
National Park Service
1849 C Street NW
Washington DC 2240

Dear Director Jarvis:

The Board of Directors of the Grand Teton Association, the nonprofit partner with Grand Teton National Park since 1937, and as the parks cooperating association, would like to thank you for the work you have put into the revision of Director's Order #21, DO21. There are many excellent revisions. While we do not currently have a fund raising agreement since we work under Directors Order 32, there are some areas that apply to Cooperating Associations that we have concerns about as a board.

Our organization does not agree with the need to pass money collected in our bookstores through the National Park Foundation when the current systems has been successful. The checkout counter donation program for concessionaires should not be tied to to cooperating associations who have a long established reporting system to the NPS.

Revising the program to include cooperating associations (lines 576-80) ties us to a fundraising agreement that is already addressed in our existing agreements.

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We further recommend that DO21 explicitly authorize cooperating associations in Section 3.3 to accept small donations at checkout counters for the benefit of the National Park Service and the association; this authorization is presently implied in Lines 551-552. Such activities should not require a separate fundraising agreement; rather, the cooperating association agreement should be seen as sufficient authorization given the limited scope and scale of the donations. As the majority of cash register transactions are tendered with credit cards and there is a direct fee associated with processing credit card transactions, associations should be authorized to recover administrative costs for this activity. Our customers/visitors are specifically wanting these donations to benefit Grand Teton National Park and Grand Teton Association, even though they may support the entire NPS system.

Thank you for your leadership on the philanthropy for national parks, we are very proud to have been one of the very first park partners in the cooperating association network.

Sincerely,

The Board of Director's
Grand Teton Association.
Moose Wy 8312

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 302

Author Information

Keep Private: No
Name: N/A N/A
Organization: NPS National Capital Region
Organization Type: I - Unaffiliated Individual
Address: Washington, DC 20242
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

NPS - National Capital Regional Office
Comments on Revised Director's Order #21
Date: May 16, 2016

The following are the comments and recommended edits from the National Capital Regional Office on the 45-day review draft of Director's Order #21: Philanthropic Partnerships listed in the NPS park planning system as project #60882.

Overall, we applaud the effort to update the policy on donations, fundraising and park philanthropy. In particular we support several positive advances within the revision:

- Agency positioning and language within the document that encourages NPS leaders and employees to embrace and support park philanthropy as a longstanding tradition and vital component to fulfilling the NPS mission.

o(See lines 3-10, page 2 footnote 1, lines 111-114, lines 121-123, lines 145-150, lines 188-207, lines 211-213, lines 308-309, lines 344-347, lines 474-481, lines 524-530, lines 966-969)

- Additional opportunities and methods to recognize donors while still maintaining the integrity of the NPS and parks.
- o(see lines 1150-1151, lines 1166-1189)

- Updates that acknowledge and allow for new technologies and methods to accept donations.
- o(See lines 590-611)

- Updates which clarify and confirm partnership design and construction options and process.
- o(See lines 958-996)

- Establishment of a Sponsorship Agreement for NPS use with partners and sponsor entities.
- o(See lines 835-844)

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- Identification of authority for NPS to deposit monetary donations in interest-bearing US Treasury investments.
o(See page 18 footnote 4)

GENERAL COMMENTS:

General and overarching concerns and comments include the following:

- Policy Title: The shift of the Director's Order title from "Donations and Fundraising" to "Philanthropic Partnerships" does not effectively reflect the components addressed in the policy. While I understand the attempt to position all donations and fundraising activities that benefit the NPS as philanthropic partnerships, it is not a good fit for this policy title. Because the NPS does not have any other policy that identifies or frames NPS partnerships, this title has the potential to confuse the NPS staff, our broad family of partners, and the public. It begs the question, is the NPS only interested in engaging with partners that fundraise for the benefit of NPS?

o Recommended change to Line 2: "Director's Order #21: Park Philanthropy - Donations, Fundraising, and Sponsorships"

o Recommended change to Line 14: "Fundraising to #21: Park Philanthropy - Donations, Fundraising, and Sponsorships"

- Lack of the Reference Manual for DO21: Several important sections of the policy indicate that additional information and guidance can be found in the Reference Manual yet it was not available for concurrent review. This made key sections of the policy difficult to understand the full intent or impact of the Policy. I share NCR partners' concern that "the devil is in the details" and right now several of those details are unknown.

- Function and Content of the Policy: There are several other sections of the Policy where the content and function do not fit the standard for a Level 2 directive. At times the information is too specific and includes guidance below the level of the Director resulting in a policy that is long, unwieldy, and unnecessarily limits NPS managers' flexibility. These sections would be a better fit within Level 3 materials.

The three passages below from DO#1, frame the function and format of Level 2 (Director's Orders) and Level 3 (Reference Manuals, Handbooks):

"All directives will be written in plain English, be logically organized, strive for brevity, and in other ways apply the principles of plain language; help the reader understand why the subject matter is important to the Service, and how the policies, procedures, and other requirements will help achieve the desired results; be coordinated among all offices and program areas that might have an interest in, or be affected by, the subject matter; and avoid imposing unnecessary or burdensome responsibilities on field managers and staff."

"Director's Orders capture the Director's expectations, instructions, and delegations of authority and responsibility. They generally should avoid detailed information or procedures, or other elements that would be more appropriately issued in a Level 3 document as a delegated functional responsibility of an associate director or assistant director."

"Level 3 materials are the primary vehicle for managers to communicate comprehensive information to support field and program operations. They consist of reference manuals, handbooks and other materials where field and program staff may access (or learn where to find) the things they need to know to successfully perform field operations or implement a program. No matter what they are called, Level 3 materials are supplemental and subordinate to Director's Orders and Management Policies. Level 3 materials are updated as necessary and may have a sunset provision."

In support of the recommendation that significant sections of the document be moved to Level 3 material, it is also recommended that there be several distinct Level 3 documents for DO#21. Level 3 documents could include: 1. Authorize Employees Reference Manual that covers competencies, roles and responsibilities for NPS employees, 2. Donor Vetting Guidelines, 3. Donor Recognition Handbook, 4. Philanthropic Partnerships Intellectual Property Reference Manual, and others materials as needed. The following are just three examples of the many sections that should be moved to a Level 3 document:

- Section 3.1.3 Authorized Employees, lines 156-207. The long list of responsibilities should be moved to the RM. Other Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

sections focused on the roles and responsibilities of managers should also be moved to a Level 3 document. These sections are specific to targeted employees and managers and include the detailed information to implement the policy.

- Section 3.1.12 NPS Partnership Council. The DO should only identify the establishment of the Council, its relationship to policy, and delegate the oversight of the council to the AD. All the specific details related to the roles and membership of the Council should be under a Level 3 document. As is the NPS is purposely binding itself to a Council structure that should be managed at a level below Policy. If there were ever an interest to change membership it would require a waiver or change of policy, which would be burdensome and unnecessary.

- Section 8.4 Off-Site Donor Recognition, Lines 1089-1112 and Section 8.5.2 Suggestions for In-Park Recognition, Lines 1126-1185. The DO should acknowledge with simple short statements the appropriateness of off-site and in-park recognition but the specific examples should be included in a Level 3 Donor Recognition Handbook. If seen as necessary, the policy could identify a list any prohibited recognition and those allowable that require special notification.

- Use of the terms "Partnerships" and "Partners": Because the NPS does not have an overall policy on partnerships, this policy should remain focused on fundraising, donations, sponsorships, and fundraising partnerships. At times the document blurs and blends general NPS partnerships with philanthropic or fundraising partners. This has potential to confuse NPS staff, our broad family of partners, and the public.

- o (Recommend addressing and correcting the issue found in lines 11-13, 88, 93-94, 213-214, 262-263, 269, 306-307, 309, 310, 326, 348-361, 751)

- Length of the Policy: Overall the policy is too long in length and not focused enough on true policy level information. Some specific sections would be better suited for a Level 3 Reference Manual to help with function, flow, and readability of the policy. Recommended changes will be addressed under specific comments.

- Focus of the Policy: The overall impression is that the policy was written for the larger parks and larger philanthropic partners that are more financially successful and have paid staff. The responsibilities and expectation identified for our philanthropic partners include items that are typically include in agreements or are more extensive than in the past. For example the statement that philanthropic partners "should obtain accredited philanthropic competency training and certification program" may discourage existing small partners or new partner.

- Delegation of Authority Thresholds: Although it is generally positive to see the increased levels of delegation, they are still too low and restrictive. Recommend the policy state that the Director may delegate the authority to accept donations and enter into agreements to certain leadership (DDs, ADs, RDs) with NO CAP in the policy and that the standing details on thresholds will be outlined within Level 3 materials and specific delegation memos. This would provide more flexibility to the Director and the field. The Table following line 209 could then be shifted to the RM to reflect the current levels the Director is willing to delegate. This approach would avoid needing the Director to waive policy for cases where the Director wants to delegate the authority to RDs to enter a fundraising agreement at higher levels than what is identified within the current Table.

- Commemorative Works Act: In various sections, the Policy references or footnotes the Commemorative Works Act (40 USC 8901-8909) related to Washington, DC and its environs. There needs to a clear representation of the legal parameters set forth in the CWA as it relates to this Policy. Currently it is left up to the reader to look up the reference in every case.

- o Lines 1002-1004 should be edited to read: "Design competitions may be used for the design of new memorials and associated facilities at national parks in the District of Columbia and its environs, however the design process must comply with the requirements of the Commemorative Works Act (40 USC 8901-8909)."

- o Lines 1037-1038 - The Policy should either list the special requirements for donor recognition at national parks in the District of Columbia and its environs or it should direct readers to a Level 3 document to go into detail on the topic.

- o Page 31 Footnote 7 - this statement cannot stand alone without significant context and additional information. It should be pulled up into a new section that presents the difference between commemoration and name recognition and provide specific

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examples. Furthermore, there should be a clear policy related to the "paving stones, benches and park furnishing" within the District of Columbia and its environs. For example, a small plaque on a bench might be used to recognize a donor to the park, but the Commemorative Work Act prohibits the plaque dedicated to the memory of an individual. So "Donated by John Doe" may be permissible, but "Donated in memory of John Doe" is not. The National Office should set up a meeting with NCR to develop language for the policy.

o Page 32 Footnote 8-9 - Donor Recognition - Naming Rights section includes a reference to following CWA. Again this either should be pulled up into the Policy or the Policy should direct the reader to a Level 3 document. Alternatively, the footnote could state directly that the Commemorative Works Act prohibits naming of facilities within national parks in the District of Columbia and environs after a donor.

SPECIFIC COMMENTS:

- Section 1.1 Background, Line 16-17:

o While the ideal is to recognize all donations regardless of size, it is not functionally nor operationally practical.

- Section 1.1 Background, Lines 18-23:

o This paragraph needs to be rewritten. Language such as "regulate fundraising activities" and "exercise some control of private parties' fundraising activities" is too strident and the wrong positioning. Focus on and build off of the clause in the paragraph that reads, "NPS may enter into written agreements that authorize others to conduct fundraising on its behalf." From there identify that the NPS will collaborate and be actively engaged in the fundraising priorities, decisions, and activities. It is possible to meet the intent of the paragraph using more productive language.

- Section 2.2 Authorities for Philanthropy and Partnerships in the NPS

o The Commemorative Works Act (40 USC 8905(c)) should be identified in the Authorities Section with a short paragraph describing the authorities and limitations to acknowledge donor contributions at commemorative works in Washington, DC and environs.

o Public Law 108-108, Title I, 145 should be identified in the Authorities Section with a short paragraph based on the following information:

- ♣ Public Law 108-108, Title I, § 145, special event permits on the National Mall and area parks will expressly prohibit the erection, placement, or use of structures and signs bearing commercial advertising. However, a permit may be issued that authorizes the recognition of sponsors of special events, if the NPS determines that the size and form of the recognition is consistent with the special nature and sanctity of the National Mall or any other requested park area, and if the lettering or design identifying the sponsor is no larger than onethird the size of the lettering or design identifying the special event.

- Section 3.1.3 Authorized Employees

- The revised policy reads as if NPS staff must complete a training certification to be identified as an "Authorized Employee" in order to accept any donations, enter into any fundraising agreements, or engage in any philanthropic partnerships. This could be seen as a significant cost and burden for many NPS managers that are only involved in local, small or limited efforts. If this was not the intent, then there should be a threshold level identified at which the training is required. Recommend the level be set at \$1M or more.

- As stated in the general comments, the specific detailed responsibilities for "Authorized Employees" should be moved to a Level 3 document.

- o Section 3.1.4 Philanthropic Competencies and Skills

- ♣ It is difficult to understand the scope, cost, and impact of this section of the policy without the accompanying Level 3 document to provide more information on the required "training certification program" for authorized NPS employees. Recommend that the program be developed to be not only focused on NPS fundraising policy, so that there is an incentive for

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both NPS and partners to see the extended/transferable benefits and value from attaining the certification.

o Section 3.2 Philanthropic Partners, lines 369-370

- ♣ While we support broadly defining philanthropic partner entities, the end of the statement should be rewritten as follows:
 - "...that has an agreement to fundraise or otherwise generate donations, on behalf of or for the benefit of the NPS."

o Section 3.2 Philanthropic Partners, lines 371-388

- ♣ Directing requirements and expectations of outside organizations seems inappropriate in a Policy document. Potentially the positioning should be to direct Authorized Employees to ensure that their philanthropic partners meet certain standards. Or the section should be moved to a Level 3 document as guidelines and support information.

o Section 4.1 Types of Support Accepted by the NPS, Lines 426-429

- ♣ The second sentence of the first paragraph should be clarified to relate specifically to those cases where contributions are from identified donor. Otherwise it is not practical for NPS or philanthropic partners to create bank record or written communication that shows the name, date and amount for every individual contribution. For example, there are donations that are collected when the individual donor is unknown (i.e. Donation Box).

o Section 4.2 Use of Donations

- ♣ Lines 436-437 - - Clarify when and to what extent donated funds can be used to support/underwrite a permanent position. What if a park hires a permanent employee to be funded by donations to work on a project that's expected to last only three years?
- ♣ Lines 448 - - revise to read: same reviews and approvals and meet the same standards as projects that use appropriated funds.

o Section 4.3 Fundraising Campaigns

- ♣ Line 454 - - revise to read: with tobacco or any illegal product.
- ♣ Lines 460-462 - - This seems inconsistent with section 4.4.1 where we allow affiliation of NPS marks with non-NPS entities in a fundraising campaign.

o Section 4.4.1 Cause-Related Marketing

- ♣ Lines 484-485 - - revise to read: One goal of a cause-related marketing campaign is for the NPS and a corporation to co-brand campaign promotional materials for mutual benefit.

o Section 4.4.2 Corporate Social Responsibility

- ♣ Line 505 - - related to the word pro bono in this section - it seems to imply that we would consider pro bono expertise in the context of CSR as a service that's eligible to be recognized as a donation, but section 4.5 (line 518) indicates that professional expertise is a form of volunteerism and should be treated and recognized as such.

o Section 4.5 Volunteers and In-Kind Donations

- ♣ This section clarifies that pro-bono services are considered a form of volunteerism. Yet the use of the term "in-kind donation" is confusing since it is used throughout the Policy. We recommend the section be retitled as "Volunteers and Pro-bono Services" and a separate section should be created that defines "In-Kind Donations" excluding pro-bono services.

o Section 4.6.1 In-Park Fundraising by Partners, Lines 541-552.

- ♣ This section implies that philanthropic partners are gaining special rights when in fact collection of donations by a permittee under a special use permit can already be authorized.
- ♣ We recommend having this section reviewed by the National Mall permit office and the WASO manager of Special Park Uses.
- ♣ The question would be, could there be a perception that Superintendents would give preference to approving permits of NPS philanthropic partners since they would be collecting donations to benefit the specific park.
- ♣ Any policy guidance given here needs to consider National Park Service Management Policies Sec. 8.6.2.

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o Section 4.6.2 Donation Box -

♣ Does "benefit the NPS" include the philanthropic partner using some of the funds from a donation box to cover organizational expenses? Managing donation boxes is a time-intensive and costly responsibility for parks. We should encourage parks to have their friends group undertake this responsibility and we should allow them to retain some of those funds for their own organizational needs and to cover the costs of managing the donation box(es).

o Section 4.6.3 Checkout Counter Donation Program

♣ The requirement that the donated funds collected as part of the Checkout program must go through the National Park Foundation is a legacy established under Secretary Norton. For those parks that have long-standing Friends Groups (Philanthropic Partners) this is an unnecessary step that reduces the intent and impact of the guest donations to benefit the local park. The NPS should work with the Secretary's Office to issue an updated memo to provide more flexibility for this program.

o Section 4.7 Electronic Donations and Emerging Practices

♣ Suggest rewording some of this section to acknowledge that these are commonplace (and may only be "emerging" to the NPS). For example, (line 591), suggest simply deleting "Recent"

♣ Lines 599-600 - - should there be some guideline for how much of the proceeds can be used to cover administrative costs. Simply saying "partners may use some of the funds" seems too vague to me. Line 609 (Sec. 4.7.1) mentions "an approved portion of the funds" which is still vague, but at least better/more clear that it must be approved.

o Section 5 Donor Review

♣ Lines 624-625 revise sentence to: The information discovered is used to make informed decisions about whether to accept a donation.

o Section 5.1 Acceptance Considerations

♣ Line 637 - need a line break to create a new section for 5.1.1 Prohibited Sources

♣ Line 642 - revise to: "...any illegal products."

♣ NPS is to decline direct donations from tobacco companies, but in the powerpoint presentation located with this DO on PEPC, there is reference also to drone companies. Does that need to be included here?

o Section 5.2 Evaluation Factors

♣ Line 657 - - Don't understand what the phrase "It is neither exclusive" means. Should it say "It is neither comprehensive"?

o Section 5.3 Process for Vetting Direct Donations, Lines 712-713

♣ The policy to ask donors to provide information through the "DI 3680 Donor Certification Form" for direct "donations valued at \$25,000 or more" needs additional clarification. The form is not referenced within 374 DM 6.10 or elsewhere in the departmental policy. Is this policy or is it good operational practice? If good practice then it would move to a Level 3 document.

o Section 6 Public-Private Partnerships

♣ As stated under general comments the title of this section is too broad.

♣ Lines 768-778 - the "Strategic Philanthropic Partners" category is potentially problematic for the National Capital Region. The long list of example types of organizations (lines 770-774) for this category is very broad. Who makes the determination over which category a partner falls under for its relationships and agreements with the NPS? Many of the NPS partners (longstanding and new) may consider themselves under this category versus the Philanthropic Partners category. This could result in partners purposely distancing themselves from the NPS to avoid having to collaborate with the NPS when setting annual fundraising priorities and making decisions about fundraising for the benefit of the NPS.

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o Section 6.2 Philanthropic Agreements

- ♣ Lines 790-792 indicates that the NPS philanthropic partnership agreement will authorize annual or membership campaigns of the organization. These are the annual and regular functions and operations of our nonprofit partners. It is very likely that partners will find it too intrusive if they need to seek NPS approval annually to conduct their basic fundraising.
- ♣ Lines 796-815. the graduated level of partners for entering the terms of an agreement is helpful in concept. Yet it is causing many questions and concerns from our partners. Suggest that this section be moved to the Level 3 materials allowing for Superintendents to benefit from the guidance but not binding parks to the levels as policy.
- ♣ Line 799 - are supporting partners not allowed to refer to themselves as "supporting partners"?
- ♣ Line 806 - - the phrase "with 20 or more years of service and support" on the face of it could apply to Eastern National (even though they are considered only a "strategic philanthropic partner.") Are they able to call themselves a Legacy Partner?
- ♣ Line 813 - - can Congressionally Authorized partners also refer to themselves as Legacy Partners or Premier Partners if those labels also fit?

o Section 6.2.4 Sponsorship Agreement

- ♣ This section should reference Public Law 108-108, Title I, 145 and adopt the standard as policy for the agency to be included in all sponsorship agreements.
- "A permit may be issued that authorizes the recognition of sponsors of special events in parks, if the NPS determines that the size and form of the recognition is consistent with the special nature and sanctity of the national park area, and if the lettering or design identifying the sponsor is no larger than one-third the size of the lettering or design identifying the special event."

o Section 6.2.6 Feasibility Studies

- ♣ The requirement for feasibility studies should shift up following the graduated levels of partners up to \$5M.
- ♣ Lines 869-874. Feasibility Study waiver request approval indicates it will be based on the delegated authority thresholds. If the first recommendation is not adopted, how would the approvals work under the following scenario: a feasibility study waiver request for a \$3M project and the Superintendent has been delegated authority up to \$5M. Would the Superintendent be able to approve the waiver request?

o Section 6.3 Intellectual Property

- ♣ "Developed intellectual property" needs a more comprehensive definition. Does any IP created related to the philanthropic partnership result in "developed intellectual property" classification? What is the legal reference for the position that NPS must own everything if the agreement ends? Will this be the position and policy of the NPS for all partnership agreements? Or are we putting a different standard on our fundraising partners? This has potential to be a deal-breaker for some of our partners. Do we really want to own it all in the end? Possibly we only care about those IP items that directly reference a park or the NPS?
- ♣ As recommended within the general comments sections, a Level 3 document should be created on this topic to help understand and implement the management of IP.
- ♣ Lines 882-883 - - related to all IP becoming property of the NPS upon termination or expiration of the agreement. Our understanding is that without specific legal action or maneuverings to protect the IP, it would, under this scenario enter the public domain. If that is not our intent, we should revisit this wording.

o Section 6.4 NPS Brand Management and Logo Licensing

- ♣ Lines 897-899. Is the phrase "use" different then the phrase "licensing" between these two sentences? In other words, can the NPS approve the "use" of the Arrowhead by philanthropic partners under an agreement? This is critical to the success of the relationship and to build and sustain credibility with the public. Historically, we have allowed "use," which essentially amounts to a non-exclusive, fee-free license. We just didn't call it licensing. Are we changing direction?
- ♣ There could be some confusion here about co-branding in a non-fundraising context (see DO52B) and in the fundraising context. It's possible that we need to re-consider 52B if we're headed in a more restrictive direction.

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- ♣ Line 897 - - OCLA (specifically Jeremy Sweat when he was there) was working on a bill to protect all NPS IP. The draft language also would provide specific authority for NPS to retain any proceeds from licensing agreements. Would suggest checking in with Don Hellman on how that document is related to anything in this section.
- ♣ Line 926 - DO52B (Graphic Design Standards and Graphic Identity Framework for Partnerships) is a very useful guide for co-branding decision making because it considers the level of involvement of each partner _ NOT _ related to fundraising and donor recognition. Before writing the RM21 section on this, please consult with the DO52 suite of policies to see what might be useful.

o Section 6.5 Sponsorships

- ♣ Lines 935-939 Media Support (see DO52 suite of products)
- ♣ Line 946 - here is another mention of "in kind services" - shouldn't those be acknowledge as volunteerism?
- ♣ Line 955 - - as written all requests to use NPS marks must be approved by the Office of Partnerships and Philanthropy. This is not practical or possible given volume of requests and capacity to review.

o Section 7 Partnership Design and Construction Projects

- ♣ Lines 964-965. Not every situation should require a partner to enter a Design and Construction Agreement. What about when the partners only want to fundraise for a construction project? Depending on the level of the agreement and the size of the project, it might be authorized under the annual work plan.
- ♣ The starting threshold should be higher than \$100K. Possibly the \$500K regional DAB level should trigger the need for the Agreement.
- ♣ What about if a partner get an outside firm to provide the A&E work - based on Section 4.5 of the DO, is that now considered a form of volunteerism and not governed by this DO?
- ♣ The reference to the Commemorative Works Act needs to be edited as referenced in the general comments.

o Section 8.4 Off-Site Donor Recognition

- ♣ Line 1093 - just an example of something that needs to be edited throughout the document. "Donation Acceptance Letter" has inch marks around it instead of typographer's quotes. Similar instances (but with the foot mark instead of apostrophe) on lines 1119 in "park's" and 1137 in "park's"

o Section 8.5.2 Suggestions for In-Park Recognition

- ♣ Lines 1160-1163 - although this says that recognition on pavers and bricks should be reserved for "the top tier of donors" (and not just for participating in the campaign), we should be absolutely explicit that we are not allowing a "buy a brick" campaign or that's exactly what we will get.
- ♣ Line 1179 - suggest adding emphasis to "before an offer can be made to a potential donor."

o Section 8.7

- ♣ Who authorizes use of logos/name script/credit lines (Superintendent or higher)?

o Section 8.9.3 Non-NPS Events

- ♣ Lines 1228-1229 - Suggest adding language to this sentence to include "coupons, or vouchers for special offers or samples."

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 303

Author Information

Keep Private: No
Name: Robin
Organization: NAMA
Organization Type: I - Unaffiliated Individual
Address: Washington, DC 20024
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

123 The draft DO makes frequent reference to RM-21, which is not yet available for review. It is very difficult to assess the provisions of the DO without the associated RM

155 Please clarify what "assisting philanthropic partners in achieving fundraising goals."

213 Any training certification program should result in a widely-recognized certification that contributes to an employee's professional development and is applicable outside of the park service.

215 Will NPS provide funding for partner organization's staff to acquire NPS-required fundraising certification? Have we looked at the financial implications of this?

329 While Superintendents are the delegated staff to accept donations and approve agreements, it would be beneficial to other park staff working on agreements (deputies, division chiefs, partnerships staff) to receive the training and certification .

344 The provision enabling NPS employees to assist with donor cultivation will result in both better partnerships and better donor cultivation

364 Please clarify and define "provisions that alter approved agreement templates."

367 Not quite sure if this is accurate-aren't all philanthropic partners non-public entities? The way this is worded implies that there are philanthropic partners that are public.

374 The way this section is worded implies that a separate donor recognition plan would be created with each philanthropic partner. That would not be feasible in parks with multiple partners, such as NAMA.

382 This requirement needs a lot of clarification. Accredited by whom and for what type of certification?

384 Can/should we recommend that our partners create endowments? Endowments are exceptionally difficult to establish and require significant resources on the part of the partner.

494 Please clarify under what circumstances a partner who is engaging in a cause-marketing effort must secure NPS approval for any campaign

506 What type of agreement would be appropriate for a partnership with a corporation or other for-profit entity?

623 The requirement to vet donations prior to acceptance can put partners in a very difficult and awkward situation. There

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should be clarification in both the DO and the RM regarding at what point a donation should be vetted, and what the vetting process consists of.

738 Please clarify what is meant by "indirect" donations; donations to partners may be for park programs, or may be for partner activities that are not directly connected to the park.

768 In order to be applicable to many of NAMA's partners, this definition could use some fine-tuning. We have many long-term, dedicated partners whose purpose, while aligned with the park's mission, is not to support the park. The best example of this are the Business Improvement Districts (BIDs), who expend several million dollars each year on park activation and improvement. This helps them achieve their mission, which is to enliven and engage their particular area of the city-the byproduct of which is significant improvements to parks, creative collaborations on activities, and a mutually beneficial relationship. These groups, despite spending many dollars in and on the park, don't fit the definition of a Philanthropic Partner - but Strategic Partner as defined here is not really applicable either.

793-815 Impossible to assess without seeing draft RM 21

793-815 Does this categorization apply to Strategic as well as Philanthropic Partners?

793-815 Were these tiers developed in partnership with partners? Many partners will be very sensitive to this sort of tier system, and will need to be educated about it

829 The description of a Strategic Partnership Agreement is not consistent with the earlier description of Strategic Partner; and again, this definition does not fit a number of NAMA partners that don't fall into the philanthropic partner category

897-898 This would be clearer if it said, "the primary NPS arrowhead mark...." And then in line 898, "secondary marks.

1080-1155 This section would be better served by having the summary of each section in the DO, and relegating all the detail of types of recognition to the RM

1126-1185 If managed carefully and responsibly, the new provisions for in-park recognition will be a wonderful opportunity to expand donor engagement and modernize fundraising strategy for our partners.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 304

Author Information

Keep Private: No
Name: Derrick
Organization: American Recreation Coalition
Organization Type: I - Unaffiliated Individual
Address:
Washington, DC 20005
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The Honorable Jon Jarvis, Director
National Park Service
1849 C Street, NW
Washington, DC 20240

Dear Director Jarvis:

The National Park Hospitality Association wishes to submit its comments and suggestions regarding Draft Director's Order #21: Philanthropic Partnerships (Draft DO #21).

Concessioners operating in our national parks support the goal of increasing philanthropic support of America's national parks as part of a broader effort to encourage a sound and sustainable financial strategy for our parks. We have long advocated a reliance on a mix of appropriations of general funds, entrance and service/rental fees, payments by concessioners and permittees, philanthropy, licensing and more. We believe it is important to review, assess and revise the current Directors Order 21, which has limited support for national park units by concessioners and others in the past and does not fully address issues including ways to utilize and protect the value of the national park brands or the evolution of philanthropy, particularly via social media and electronic recognition of contributors.

We find many of the provisions of the draft useful and worthy of support. Specifically, we support broader authority to accept gifts and better training of National Park Service and partner staff on guidelines for assessing the appropriateness of gifts, and subsequent delegation of authority when such training has been successfully achieved.

NPHA supports a clear goal of protecting and increasing the valued brand of national parks and the national park system. We do not subscribe to the belief that corporate association with these brands does or should constitute NPS endorsement, and believe that the public is not likely to purchase goods or services merely because of the inclusion of a national park mark in

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its advertising or public relations campaigns. We do believe that solicitation of philanthropic support should focus on donors who are aligned with national park goals and activities and where public awareness of gifts is most likely to be seen as logical and mutually beneficial.

In this regard, we find it curious that the agency proposes to invite the support of companies producing and marketing alcoholic products while continuing to severely restrict support by concessioners - - who provide essential and valued support to an estimated one-third of all park visitors. Concessioners operate under strict guidelines and near-complete transparency. Concessioners understand the expectations and needs of park visitors very well. Their philanthropic support of enhanced park experiences for the same visitors they serve with food, lodging and more should be encouraged, not prohibited.

We urge a revision to the draft document to recognize and support an active role for concessioners in philanthropic efforts. Specifically, we urge that concessioners be subject to no more restrictions to providing philanthropic support to national park units than any other business, with two exceptions. Any philanthropic support which exceeds 2% of the anticipated revenues under the contract in the involved unit, or which is made less than 24 months prior to the conclusion of a concessions contract within that unit, could logically require review and determination of appropriateness by the Director or his designee.

There are provisions of the draft which we do not support. For example, we strongly oppose the termination of existing solicitation agreements with park-specific nonprofits, allowed under the current DO-21 and the Guest Donation Program. The Draft DO-21 would require all such programs to be operated through agreements with the National Park Foundation (NPF), adding new steps and complexity to programs which have clearly successful track records. We are supportive of additional reporting on these programs, including accounting of use of proceeds and even selection of projects and programs.

NPHA opposes the change in name of the Guest Donation Program to the Checkout Counter Donation Program. We question the logic in focusing on a specific process for soliciting and collecting contributions rather than an emphasis, as it does now under the current DO 21, on the contributors: park visitors.

Draft DO #21 fails to address and resolve issues which have emerged in recent years and have hampered willing philanthropic support for our national parks, including:

- 1) Confusion about authorization for the agency to accept offered services and supplies from concessioners during unusual incidents, including storms and special events. Recent examples include events surrounding Super Storm Sandy.
- 2) Agency opposition to allowing concessioners to share with NPF and local non-profit organizations supporting national parks the names and contact information of individuals making Guest Donations for solicitation of larger gifts and/or providing ongoing support of national parks, and particularly the park unit actually visited.
- 3) Denial of requests to solicit and implement corporate matches of Guest Donation Program gifts for specific parks and periods.
- 4) Authorization of concessioner support for projects and programs within parks in which they operate that are conducted in conjunction with conservation corps, work-cation programs and hosting of targeted portions of the public not now regularly utilizing national parks, including under Every Kid in a Park.

NPHA also wishes to offer its strong support for most of the topics raised and suggestions made by the Public Lands Alliance in its letter on this issue.

We look forward to discussing these and other relevant topics with the agency as review of comments occurs and prior to the issuance of a revised Directors Order #21.

Sincerely

Terry, Chairman
National Park Hospitality Association
1200 G Street, NW, Suite 650
Washington, DC 20005

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

202-682-9530, www.parkpartners.org

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 305

Author Information

Keep Private: No
Name: Jane
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Washington, DC 20016
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Having lived in seven states and the District of Columbia, and driven cross-country with my four children, I am a big supporter of our national parks. I have seen alternative models of financial support succeed in places like The Presidio, but the idea of corporate sponsorships with naming rights and logos/brands of commercial products around our parks is profane. It insults the very heart of what our national parks should be- -places to escape from the bombardment of commercial interests and enjoy creation in it's purest form. This must be honored and protected for future generations. too.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 306

Author Information

Keep Private: No
Name: Patrick
Organization: National Park Service
Organization Type: I - Unaffiliated Individual
Address:
Charlestown, MA 02129
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As a National Park Ranger let me say that allowing any corporate logos in our parks is a terrible idea.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 307

Author Information

Keep Private: No
Name: Deborah
Organization: National Park Service, Rivers, Trails & Conservation Assistance Program
Organization Type: I - Unaffiliated Individual
Address: Boulder City, NV 89005
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

An increasing number of partnerships and donations will likely result in the logos of the National Park Service its official charitable partner, the National Park Foundation, being utilized by an expanded network of organizations. This increased exposure of NPS brands (i.e. Arrowhead, Find Your Park) through new venues will reach new audiences, which is a priority goal of the Urban Agenda and Centennial plans.

Directors Order #21, Section 7.0 states that "corporate campaigns must be conducted with high standards that maintain the integrity of the NPS and its partners". Consider expanding DO #21 and related policies for the Arrowhead, Find Your Park and other logos to include language that addresses relevancy, diversity and inclusion. Establishing clearer policy for logo use would promote a positive and inclusive workplace environment where all are treated equally.

Draft language follows: National Park Service and/or National Park Foundation campaign logos cannot be used in conjunction with images, language or behaviors that promote stereotypes or negatively portray individuals or groups based on gender, race, disabilities, sexual orientation or ethnicity. Images that objectify women and/or reinforce outdated gender roles should not be utilized in conjunction with National Park Service brands.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 308

Author Information

Keep Private: No
Name: Dan
Organization: Public Lands Alliance
Organization Type: I - Unaffiliated Individual
Address:
Silver Spring, MD 20902
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

The Public Lands Alliance is grateful to Director Jarvis and the National Park Service for actively seeking to increase park philanthropy and improve partnerships through a revision of Director's Order #21: Donations and Fundraising (DO21).

The draft revision contains key advances in several areas, including how the NPS and its partners engage in donor stewardship, encourage partnership training and embrace technology. We also believe that substantive, meaningful improvements ought to be made on topics like donor vetting and intellectual property and the criteria for partnership agreements before our community could give this policy our wholehearted support.

Since the release of the draft revision on March 30, the Public Lands Alliance has led an analysis of the draft revision for the nonprofit park community. We have presented virtual forums on the draft's contents, solicited partner reactions and feedback, and engaged a "rapid response team" of park partner executive directors and chief development officers. Through these efforts, we have developed two documents that together encompass our official public comment. These documents are:

- A letter from our community to Director Jarvis dated May 16, 2016 that outlines key advances in the draft revision and articulates major recommendations for its continued improvement; and
- An annotated version of the draft revision that supplements and builds upon our community response letter.

Our recommendations are grounded in comparisons between the current DO21 and the draft revision, the report of the National Park System Advisory Board, and the experiences of the nonprofit park community. These documents have been forwarded to Reginald Chapple, Division Chief, NPS Partnerships and Philanthropic Stewardship.

Understanding the true impact of a revised DO21 is difficult to ascertain as the document refers often to a Reference Manual #21, agreement templates, and training and certification programs that do not yet exist. We ask the NPS to actively engage with the Public Lands Alliance to develop these tools in the coming months as you consider our recommendations to the policy itself.

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Our thanks again for creating this important opportunity to enhance national park philanthropy.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 309

Author Information

Keep Private: No
Name: Edward
Organization: Individual and Friends of Acadia
Organization Type: I - Unaffiliated Individual
Address:
New York, NY 10075
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for the opportunity to comment on the draft Revision of Directors Order #21: Philanthropic Partnerships.

My name is Edward Samek. My comments come from four perspectives: 1) as Chairman of the Board of Directors of Friends of Acadia, 2) as a member of the Regional Council of the Northeast Region of the NPCA, 3) as an experienced business executive having been CEO of four businesses and served on the Boards of Directors of more than six companies and 4) as a great lover of the American Parks both the big land parks and the cultural and historic monuments and sites.

I will confine my comments to just three (3) major topics because I know that many others including Friends of Acadia and several groups with which I'm affiliated including the Friends Alliance submitted significant and detailed comments for your consideration. The three topics are 1) CREATING A PROCESS FOR ALLOWING EXCEPTIONS, 2: POTENTIAL ADVERSE OUTCOMES FROM UNINTENDED "FAMILY COMPETITION" and 3: A MAXIMUM TERM OF 5 YEARS IS UNLIKELY TO BE SUFFICIENT TO ATTRACT MAJOR PHILANTHROPIC SUPPORT.

I thank you for the opportunity to submit comments and I applaud you for the courage to take on this important revision as well as on the remarkable insight and extraordinary work reflected in the Draft.

****MY COMMENTS****

1: CREATING A PROCESS FOR ALLOWING EXCEPTIONS

It has been my experience with every policy, procedure and contract I have written or been party to that I subsequently learned that I had neither known everything I wish I had known at the time it was written nor did I have a crystal ball to have told me what changes in the world would occur in the future. As a result, I learned that all parties benefited from having an "exception process". For example, possibly language such as "exceptions to the foregoing may be permitted with approval of the Director (and the involved Park Superintendent)".

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2: POTENTIAL ADVERSE OUTCOMES FROM UNINTENDED "FAMILY COMPETITION"

My concern here is the risk of potential confusion, disappointment, lost opportunity or offending that could result from more than one person in the NPS and its various Philanthropic Partners discussing a supporting need and/or opportunity in one park while a regional or national representative is discussing the same or similar project with someone else. For example, imagine if Friends of Acadia or Acadia's superintendent, Kevin Schneider, found a donor for an important project at Acadia only to find that a regional or national official was discussing a similar opportunity for support on a larger geographic scale which would not allow the local project to go forward despite months or years of donor cultivation. To be a bit more granular:

- a) How would it be handled if a specific Park had a firm commitment and national had a "bird in the bush"?
- b) Acadia has a long-standing relationship with L.L. Bean for the Explorer Bus System. If national made an arrangement with someone like General Motors, Subaru or whomever to provide vehicles or fuel or something else related, would we have to terminate our relationship with L.L. Bean?
- c) How would it be handled if a local park had a project with local support from an appropriate and well-respected commercial partner or donor and national wanted to enter into a national agreement with a competitor? While Coke and Pepsi are not necessarily likely Park supporters, their interest in endorsements, their regional operations and their highly competitive nature are a good example of such competitive entities we might encounter.

3: A MAXIMUM TERM OF 5 YEARS IS UNLIKELY TO BE SUFFICIENT TO ATTRACT MAJOR PHILANTHROPIC SUPPORT

Some potential projects may be so costly that a donor who has the resources and willingness to support the project would be unable to justify it if the guaranteed naming opportunity is only five years or fewer. Examples could be A) providing compensation for 15 Park Rangers through an endowment, or for a defined period of, say, 15 to 20 years, B) construction of off-site parking (above or below ground) to eliminate vehicular congestion, emissions and more as NPS and those of us who care about the parks are successful in increasing visitation and C) constructing a Leeds certified Visitors Center with significant education and interpretive ability.

I would be very pleased to answer any questions or provide any clarification which might be helpful to you. Please feel free to contact me either by email, ed@samek.net or by telephone 908.616.5758.

Once again, thank you!

Ed

end ##### end of comment document

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 310

Author Information

Keep Private: No
Name: John
Organization: Sierra Club
Organization Type: I - Unaffiliated Individual
Address:
Oakton, VA 22124
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

While we support the generation and use of philanthropic contributions to support the operation of the national park system we oppose the display of promotional material - or other private material - in units of the national park system, including such things as: donor recognition on vehicles or anywhere else, sponsorship and cause-marketing.

Park visitors come to national park units to enjoy their natural, cultural and recreational resources. Allowing the display of promotional or private material detracts from this enjoyment. People visit parks to escape from the commercialism outside parks.

John
Chair
National Parks and Monuments Team
Sierra Club

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 311

Author Information

Keep Private: No
Name: Stanley
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Carmel, CA 93923
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Our national parks are a respite from our pervasive commercialism and consumerism. Those aren't bad in themselves, but some things should be held apart and above incessant advertising, however subtle. Our national parks should not be for sale, even a little. They should be held sacred. Little else is, anymore.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 312

Author Information

Keep Private: No
Name: Greg
Organization: Golden Gate National Parks Conservancy
Organization Type: I - Unaffiliated Individual
Address:

San Francisco, CA 94110
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

May 16, 2016

Jonathan B. Jarvis
Director
National Park Service
1849 C Street NW
Washington, DC 20240

Dear Director Jarvis:

Re: revision of Director's Order #21: Donations and Fundraising (DO21)

The Golden Gate National Parks Conservancy is pleased to be a signatory to the response letter from the Public Lands Alliance (PLA) on the draft Director's Order #21 (DO-21). We support the comments of PLA on the revision of DO-21. And like PLA, we express our admiration and appreciation of the NPS efforts to bring DO-21 up to date with current philanthropic opportunities and practices in our national parks. The board of trustees and staff of the Conservancy are grateful for the work done by the National Park Service team to foster giving to and appreciation for gifts to the parks.

Because the Conservancy has a long, successful and ambitious history of raising philanthropic contributions for major NPS projects and programs, we are submitting this letter to address issues that reflect our experience and needs. Many of our trustees have experience in philanthropy - and experience in giving to the NPS - so our comments reflect this capability and expertise. We believe the DO-21 revision has made significant progress - and we have recommendations for changes that are important to our proving a general endorsement of the revision.

Based on our experience, we offer key issues of concern about the current draft DO21. These points are shared in the Public Lands Alliance's response letter and comments as well as derived from our own experiences in fundraising opportunities and

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potential stumbling blocks here at the Conservancy.

1. The Delegation of Authority & Thresholds: This area of DO-21 is confusing, and the base thresholds for "Donation Acceptance and Agreement Approval" seem to be at a very low level, especially considering the experience and ambitions of the various friends group who are long-term NPS partners. The matrix at the conclusion of section 3.1.3 attempts to clarify various delegations - and if we are reviewing it correctly, we commend the ability for Superintendents to be delegated authority for gift acceptance and agreement approval up to a \$5 million level.

Looking more comprehensively at the entire DO-21, we recommend making the various levels and approvals more understandable through some form of visual presentation, perhaps in a matrix that summarizes all the content, level and approver. We do appreciate the increased level with training, and recommend that another qualification for approval level could be scope of experience.

2. Fundraising Campaigns and Agreements: It is a bit unclear about what campaign levels require a specific fundraising agreement - and how delegation or status (Supporting, Premier, Legacy) affect these levels, if at all. We recommend that the "partnership status" should affect the levels of gift acceptance and fundraising agreements, with Legacy Partner levels established at \$5 million minimum.

3. Approval of Printed Materials: Philanthropy involves continuous and regular communication with donors, members, prospective donors and the public. The requirement (3.1.3 j) to review and approve all information materials is excessive and impractical. In our Conservancy's entire history of working with the NPS, we have never advanced communication materials that were not appropriate and consistent with NPS policy, messages and brand.

To summarize our recommendations:

-Remove this condition - or limit this condition to formal Campaign materials, not "all informational materials about a proposed donation, proposed solicitation or fundraising campaign...."

4. Donor Review and Vetting: This is our area of biggest concern. The DO draft is rather confusing to absorb in this area and seems to direct philanthropic partners to submit the names of many prospective donors to NPS for review. Also, it is only in the later pages of DO-21 that the reviewer learns that "Partners must be aware that Departmental and NPS policies govern the vetting of donations made directly or indirectly to the NPS." One presumes that means almost any donation made to an NPS partner.

As a result, the gift levels that require donor vetting are far too low - causing excessive, unnecessary and potentially untimely reviews. Additionally, the NPS nonprofit partners have their own ability to "vet" donors as a "best practice" of our philanthropic role.

We strongly recommend that gifts from authorized charitable organizations and philanthropic foundation be exempt from any donor vetting. These entities have adequate regulatory oversight at federal and state levels to avoid operating in any conflict of interest position.

Effective philanthropy is built on a foundation of trust, communication and confidentiality. Those of us working with philanthropists get to know them and their role in the community. Except for extraordinary gifts, the donor review should be as close to the park level as possible. And given the access the public has to government records, we would need assurance that the NPS can ensure the confidentiality of donor information.

Finally, it does not appear to us that the proposed level of vetting of "prospects" is practical. More than 17 million people visit the Golden Gate National Parks area each year. We consider each visitor to be a prospective donor, as I suspect most park friends groups do. At any one time, we are reviewing prospect list in the hundreds.

To summarize our recommendations:

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- Exempt gifts from philanthropic foundations and charitable entities from donor vetting by the NPS and DOI
- Raise level of donor vetting by the Office of Partnerships and Philanthropy to at least gifts over \$1 million; for Legacy Partners, raise the level to \$2.5 million
- For Legacy Partners, allow donor vetting beneath \$1 million to occur at the park level
- Remove the submittal of "proposed donations over \$50,000 to the regional director for vetting before acceptance."

5. Partnership Design and Construction Projects: The Golden Gate National Parks Conservancy has completed over \$100 million of construction projects within the Golden Gate National Recreation Area. All of our projects have met NPS standards, review requirements and budgetary goals. With this track record, we continue to question the outlined "three ways that a partner may participate in constructing facilities in national parks," especially #3 which "each party manages independent portions of the project with its own funds." We have continually provided evidence of the inefficiency and costliness of this approach and have shown our successful past track record of combining limited federal funds with philanthropic funds for partner execution. Required OMB audits for certain levels of annual federal support provide the federal safeguards and oversight required.

The revised DO-21 does not allow for this approach. Once again, we strongly recommend that this policy be revisited and changed for partners with proven experience in construction projects that utilize philanthropic and federal funds.

6. In Park Recognition and Naming: Donor recognition in national parks can be modest, tasteful and in keeping with the park setting. While the revised DO-21 allows for recognition on recognition boards, walls, paving stones and benches, we recommend that modest donor plaques be approved as well. Often, these "donor plaques" are embedded in stone at a park overlook or trail.

The 5 year limit on naming is inconsistent with other public institutions that raise philanthropic dollars. In most cases, naming opportunities for certain level gifts have a very long or permanent lifespan. Naming must be carefully considered and there needs to be a premium on this extraordinary recognition. At the same time it needs to be done in a manner that is meaningful to the donor and to their family.

To summarize our recommendations:

- Allow for donor plaques as part of in-park recognition
- Extend naming opportunity to a 15 year limit

7. Endowment Gifts: We question the need for the level of NPS oversight on endowment gifts. Many endowment gifts come through estate disbursement - and therefore the nonprofit recipient cannot be involved in approving or selecting the "name" of the endowment.

8. NPS Brand Management and Logo Licensing: As an NPS partner, we frequently identify the NPS as our partner on the majority of our public communications. To represent the partnership, we frequently show the NPS arrowhead and the Conservancy mark as demonstrating that partnership. We are assuming that this regular display of NPS and Conservancy logo's on newsletters, annual reports or other regular communications does not need case-by-case approval for each specific time this relationship is presented.

9. Checkout Counter Donor Program: The Checkout Counter Donation Program is addressed in the PLA response. The Conservancy underscores the PLA concerns. Our goal should be to provide an incentive for the groups to appeal to the public for support to the parks. The benefits of placing additional administrative overhead cost on a successful and growing initiative aren't clear.

10. Incomplete Review Materials: The DO draft alludes to documents, certifications and programs that aren't yet available for review, including an updated Reference Manual #21 and training and accreditation programs. It is difficult to feel that this current review is adequate and comprehensive, when relevant materials identified in DO-21 are not available for review

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simultaneously.

11. Concluding Remarks: As our society is evolving, so is philanthropy. We hope that the final DO will recognize that in five years there may be philanthropic strategies that aren't in our thinking right now. We hope that this is a document with the flexibility to respond quickly as new windows to philanthropic support open up.

In our history at Golden Gate, the Parks Conservancy has shown how successful a strong partnership with our National Park Service partners, based on shared values, vision and trust, can lead to significant funding for park projects and programs. We hope that our track record - and that of our colleague philanthropic partners - instills confidence, trust, and collegiality with the NPS and keeps the door open for innovation, occasional waivers when merited and change.

Thank you again for the thoughtful, inclusive and diligent work by the National Park Service to update Director's Order #21.

Sincerely,

Greg
President and CEO

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 313

Author Information

Keep Private: No
Name: Sarah
Organization: National Park Service - Outer Banks Group
Organization Type: I - Unaffiliated Individual
Address:
Manteo, NC 27954
Manteo, NC 27954
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Section 1.1:

Line 14: Does "NPS employees" apply to all NPS employees? Will all NPS employees be evaluated on their performance against these 4 goals? Needs to be defined.

Lines 16 - 17: "All giving levels" and "all donations, regardless of size" could be problematic from an administrative and return on investment (ROI) perspective if not defined and managed. Like in the corporate sector, non-profit organizations realize a return on investment at different donor levels. For example, a \$25 donation may cost \$5 to earn due to the cost of marketing materials, personnel to conduct a telemarketing campaign, etc. resulting in a 4 to 1 ROI. For another example, a \$250,000 donation may cost \$5,000 in personnel cost to develop the donor relationship, submit grant requests, report on use of funds, etc., which would have a 50 to 1 ROI. Large and established non-profits have entire teams of staff dedicated to managing donors, recognizing gifts at different levels, increasing giving levels, determining when to "fire" donors who are not providing the expected ROI. All NPS employees cannot be expected to understand and practice good donor management. These parameters need to be defined and built on best practices in the nonprofit sector and other government agencies engaging in philanthropy.

Section 1.4 h):

Line 75: Does this relate to any "cause-related marketing or corporate campaign," whether it will result in donations to NPS or not? Is this about a "cause-related marketing or corporate campaign," or about donations for NPS or NPS partners collected by or through commercial service providers in National Parks? Needs to be defined.

Section 3.1.3 d):

Lines 163 - 164: Does this evaluation include considering the up-front and ongoing administrative cost to the NPS and the ongoing cost of ownership of any building, program, etc. that NPS will have responsibility for in the future? Needs to be defined.

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Section 3.1.3 f):

Line 174: Does this include commercial services (concessions and commercial use authorizations) doing business in National Parks? Needs to be defined.

Section 3.1.9:

Line 300: Suggest establishing thresholds for conditional donations best on best industry practices in the nonprofit sector. Conditional donations (often referred to as restricted donations in the nonprofit sector) require a much higher level of administrative and accounting oversight than unrestricted gifts. NPS and partners need to establish parameters to set reasonable expectations.

Section 4.1:

Line 413: Does NPS accept gifts directly, not through philanthropic partners (friends groups)? Which types of donations, if any, need to go through a nonprofit partner rather than coming directly to the National Park Service? Needs to be defined.

Section 4.4:

Lines 478-481: "...corporate partnerships must be consistent with the mission and purpose of the NPS" How will NPS define and determine consistency with mission and purpose? Will this be determined on a donation by donation basis according to the delegation of authority associated with different donation levels? Will the Washington Office determine a list of unacceptable corporate partners and distribute this through NPS to ensure consistency among regional offices and NPS units? Needs to be defined.

Section 5:

Line 634: Does preventing financial liability include analyzing the total cost of ownership and future operational costs for NPS accepting the donation (e.g. cost to staff a visitor center paid for with donation dollars)? Facilities, programs, etc. that will continue beyond the term of the fundraising agreement will incur cost to NPS and if not managed properly could result in liabilities similar to some of the challenging leasehold surrender interest liabilities in NPS commercial services management.

Section 6.5:

Lines 932 - 934: Concerned about this level of commercialization in publications developed the U.S. Federal Government (National Park Service) such as park newspapers or signage in National Parks. Also concerned about the financial implications and business decision making. Does NPS have enough information on sponsorship programs from other government agencies or similar organizations to understand the short-, medium- and long-term impacts? Sponsorships, or advertisements, are a necessary revenue source for the news media and publishing industry, but advertising should not be a required fund source in order to produce park informational materials. We should have federal budget available for information and safety messages for our visitors.

Lines 952-953: Concerned about a sponsorship program that is designed and vetted at the regional level rather than national level. Could lead to inconsistent decision making among regions. Sponsorships would be a big change for the National Park Service and this program needs to be well defined.

Section 8.2:

Lines 1056 - 1058: Concerned about the donor recognition plan being entirely developed at the park level. Consider developing NPS standards for thresholds and associated recognition. Developing a specific and reasonable donor recognition plan requires skills and abilities outside typical NPS staff knowledge. Additionally, park-specific recognition programs could lead to highly varying programs - some of which may cost parks too much to implement or could leave donors disappointed with their level of recognition at one National Park compared to another National Park. Consider best practices among nonprofits with local chapters (e.g. what are the National Red Cross standards and how do they compare to standards developed by the Washington, D.C. Red Cross chapter).

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 314

Author Information

Keep Private: No
Name: LuAnne
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Charlevoix, MI 49720
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Our parks should not be for sale, nor for prostitution!

This grandiose privatization plan is a gross, sickening perversion of the very idea of what a national park is, and must be nixed immediately. How horribly shameful it is. And on the 100th anniversary of our beloved National Park system. The Obama Administration and the President should be- -and will be- - vilified for even considering such a plan and its Director should be fired immediately. It is a dangerous plan. It is heresy. It will destroy our parks as parks and transform them into corporate playthings.

Our parks must be kept in trust only by the people and for the people, forever, with government (taxpayer) funding.

How dare this Director sell off our parks and their attributes and the National Park Service federal agency to corporations in the name of corporate profits, greenwashing and "partnerships"? How dare this President and this Interior Secretary auction off our parks very names in the name of profits?

This is not "philanthropy." This is privatization schemes gone wild. Philanthropy is gift-giving, not a business deal.

What is being proposed- -sleazy deals involving corporate naming, branding, rebranding, advertising, and much more- - is simply corporate advertising but worse, using our public parks to greenwash themselves. While getting tax breaks, rather than paying their fair share of taxes.

Parks are held in trust by government for the people and by the people. We, the public, "own" the parks. We pay for them with our tax dollars. Any privatization scheme to alter that sacred bond between the people and our parks is dangerous for the future of the entire park system.

I am dedicated to parks and protecting them from privatization. I graduated in the parks and recreation field from a major

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

university, I worked as a park interpreter at two stunning National Parks (Sleeping Bear Dunes and Delaware Water Gap). As a park employee, I was proud to be a public servant. You cannot serve a corporation and the public at the same time. This anti-park scheme turns public servants into corporate ass-kissers, using tax dollars on employees not to serve the public but in subservience and patronage to companies by turning them into corporate fundraisers. I cannot think of anything more vile than this for a park employee. And I've cleaned public restrooms.

This plan turns the NPS agency into a "captured" agency, beholden to patrons, not the public.

Nearly two decades ago, as a sitting city parks commissioner, I sued my city to save a local park, which was selling it to a corporation to pay off a court judgement (unrelated to the park). I was asked on the witness stand, "Ms Kozma, is your name on the deed of the park?" intimating, did I personally own the park.

As member of the public, yes, we collectively do "own" the parks. We don't have, or need, our names on the deeds or the park signs nor on billboards. But really we only nurture and care for them temporarily, as we pass them on to future generations.

And if President Obama's treasonous Trans Pacific Partnership and similar trade deals ever came to pass, would these very Corporations-in-the-Parks that might have "partnership" rights in our national parks, as proposed in the Director's corporate-serving scheme, sue the federal government if these "deals" didn't serve their profits, and obtain ownership of the parks in litigation, stealing them from the people? It is quite possible and likely. After all, they'd have more than a foothold in them already. When the TPP corporate tribunals are the ones making the decisions- -who will win? The people?

We lost our city park to the corporation. There was a legal loophole. The city needed money. They cut the deal.

Big corporations are wealthy and they not only posture and give the public park system sweetheart deals masquerading as philanthropy but they also threaten the public with lawsuits when they want your parks, and have a well-funded legal team to do the dirty work of taking them- -using whatever loophole is available.

Parks are not about greed. Or money. Or business. They are to serve the public good, not to mention the conservation needs for preserving the environment and all living things and ecosystems in the parks.

Our parks don't always have a clean, ethical history. While some parks may have been donated by noble individuals, many are soaked in controversy- -even blood- -created by force, taking private and tribal land amid great controversy (witness the history of both Delaware Water Gap and Sleeping Bear Dunes which relocated entire towns by eminent domain and other force), while others were literally stolen from native peoples. This shameful history notwithstanding, the parks as they exist and have been preserved should not be subjected now to a new era of prostituting by corporate interests.

It's time to stop coddling corporations and keep them out of our parks.

Shame!
Shame!
Shame!
Shame!
Shame!
Shame!
Shame!
Shame!
Shame!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 315

Author Information

Keep Private: No
Name: Andrea
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Milwaukie, OR 97222
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/16/2016	Date Received: 05/16/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

No! The National Parks belong to the people. These are the places we go to learn about our past, our land, our selves. Business is interested in business and the business of making profit. We will lose so much if we allow corp. greed to exploit our natural treasures.

A 2009 GAO report lists several potential risks to NPS from these donor relationships, including:

"Partner exerts undue influence over Park Service priorities"
"Public confidence in the Park Service is compromised"
"Parks and Park Service become commercialized."

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 316

Author Information

Keep Private: No
Name: Elise
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Shelburne, VT 05482
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

National Parks deserve our Country's respect and honor. It would defile them to give them corporate sponors! It the very antithesis of a NATURAL WONDER to do so. Please find either a 501c3 to manage them properly, or get proper funding through Congress. Please leave corporate 'philanthopists' out of the mix. Naming opportunities are inappropriate for our National Parks... This isn't NASCAR, folks.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 317

Author Information

Keep Private: No
Name: Krista
Organization: National Park Service
Organization Type: I - Unaffiliated Individual
Address:
Denver, CO 80225
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Comments on Revised Director's Order #21
Date: May 16, 2016

Overall, I appreciate the more detailed descriptions of what can and cannot be done while fundraising and providing other kinds of philanthropic support to the NPS. I also like the additional opportunities and methods to recognize donors and ability for fundraisers to utilize new technologies and methods to accept donations. I also agree with the provision to deposit donations in interest-bearing accounts.

The following still need to be addressed in the Director's Order:

- Further clarification on sponsorship activities. Can sponsors support volunteers? If so, how can the sponsor be recognized? Can one-time or reoccurring events be named after sponsors or donors?
- When can the arrowhead be used exactly?
- Further clarification on the types of activities that a fundraiser can conduct in a park. Can they rent out equipment, lodging, spaces for special events? Can they conduct races? What kind? Etc.

GENERAL COMMENTS:

General and overarching concerns and comments include the following:

- Philanthropy and philanthropic partnerships needs to be defined. "NPS defines philanthropy as..... A philanthropic partnership is defined by NPS as....."

- Several important sections of the policy indicate that additional information and guidance can be found in the Reference Manual yet it was not available for concurrent review. This made key sections of the policy difficult to understand the full intent or impact of the Policy.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

- There is a lot of instructional content in the document that does not simply state the policy and it is not consistent - sometimes sections are prefaced and other times they are not. Taking out some prefaces to the direct policy will help shorten the document. Save the instruction for trainings and presentations that are planned for the policy roll out.
- I recommend that significant sections of the document be moved to the Reference Manual, it is also recommended that there be several distinct Level 3 documents for DO#21. Level 3 documents could include: 1. Authorize Employees Reference Manual that covers competencies, roles and responsibilities for NPS employees, 2. Donor Vetting Guidelines, 3. Donor Recognition Handbook, 4. Philanthropic Partnerships Intellectual Property Reference Manual, and others materials as needed.
- At times the document blurs and blends general NPS partnerships with philanthropic or fundraising partners. This has potential to confuse NPS staff, our broad family of partners, and the public.
- I still believe it is a mistake to base approvals for certain fundraising campaign goal amounts solely on the quantity of the money. Some donations may be much more controversial in nature rather than amount and vice versa. I think donation vetting should be based more on the complexity of the donor and donation. It would take a separate piece of the RM to detail what to vet and how but I suggest the office entertain a discussion on this.

SPECIFIC COMMENTS:

- Section 1.1 Background:
 - o Second paragraph rephrase (1) to read: stay current with philanthropic best practices or something to this affect. It's hard to direct someone to "understand" something.
 - o Last paragraph, second sentence: add "that are conducted on behalf of the NPS" to the end of the sentence. Be sure to add this clarification wherever is needed in the document to ensure partners do not subject DO 21 policy to any other fundraising they may be doing.
- Section 1.2 Purpose:
 - o The last paragraph: take out "long-established" and just leave it as organizations. This qualifier is too subjective.
- Section 1.3 Related Sources:
 - o Add Director's Orders or other regulations that cover volunteers and special use permits
- Section 2.4 is noted in the Table of Contents but missing in the body of the policy
- Section 3.1.1 Ethical Conduct Requirements:
 - o Address whether an NPS employee can be a member of or serve on a board of an organization that may have an agreement with NPS but is not affiliated with the employee's park, program or office.
- Section 3.1.2 Solicitation by Employees:
 - o I don't agree that the Director and Deputy Directors can directly solicit donations. When one of these VIPs choose to proactively talk with a specific organization or company, to me, it implies partial treatment and impropriety.
- Section 3.1.3 Authorized Employees
 - ♣ The revised policy reads as if NPS staff must complete a training certification to be identified as an "Authorized Employee" in order to accept any donations, enter into any fundraising agreements, or engage in any philanthropic partnerships. This could be seen as a significant cost and burden for many NPS managers that are only involved in local, small or limited efforts. If this was not the intent, then there should be a threshold level identified at which the training is required. Recommend the level be set at \$1M or more. The training should also be on-line, on demand and no longer than 16 hours total to be practical.
 - ♣ Authorized employees must: C and D are too subjective and vague; F second bullet take out "reasonably be expected to" since that sentence is too wordy; H second bullet is too wordy, simply say "identify any costs that may be a burden to NPS" or something; M add the word "are" between "donors consistent"
 - ♣ In addition, authorized employees may: D needs clarity, I just don't understand the meaning here; J what are third parties, define a bit
- Section 3.1.4 Philanthropic Competencies and Skills: this section is too vague - need to understand who exactly needs this, what exactly that entails, by when and for what approval level. I suggest deleting the last sentence because it's too subjective and instructional vs. direct policy.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

- Section 3.2 Philanthropic Partners: Directing requirements and expectations of outside organizations seems inappropriate in a Policy document. Potentially the positioning should be to direct Authorized Employees to ensure that their philanthropic partners meet certain standards.
- Section 4.2 Use of Donations: Clarify when and to what extent donated funds can be used to support/underwrite a permanent position. What if a park hires a permanent employee to be funded by donations to work on a project that's expected to last only three years?
- Section 4.4.2 Corporate Social Responsibility: Why is NPS engaging with corporations that have poor environmental protection practices or policies, or inhumane treatment of employees or creates products that hurt either? We are the one organization that did not allow corporations to rule the world and ruin the environment and now we are engaging with corporations through the centennial that have poor practices. There are companies with good practices that should be allowed to co-brand with NPS and others should not. We should develop strict standards (MUCH more strict than those we are using now), similar to the B Corporation model, to allow engagement with corporations and maintain our reputation as the one place where corporations did not adversely affect the environment and its inhabitants. We should be leaders in defining a much stricter definition for social responsibility rather than endorsing the misuse of this term. We are helping corporations greenwash and who will follow us on this slippery slope if we keep loosening our standards?
- Section 4.6.2 Donation Box: allow for both partners and parks to gain cost of collection from donation boxes.
- Section 4.6.3 Checkout Counter Donation Program: The requirement that the donated funds collected as part of the Checkout program must go through the National Park Foundation is a legacy established under Secretary Norton. For those parks that have long-standing Friends Groups (Philanthropic Partners) this is an unnecessary step that reduces the intent and impact of the guest donations to benefit the local park. The NPS should work with the Secretary's Office to issue an updated memo to provide more flexibility for this program.
- Section 4.7 Electronic Donations and Emerging Practices: Suggest rewording some of this section to acknowledge that these are commonplace
- Section 5.1 Acceptance Considerations: Third bullet is too subjective and leaves too much room for interpretation. State not to accept donations that have started controversy through media or other means.
- Section 5.3 Process for Vetting Direct Donations: Vetting is addressed in various sections. Wherever referenced before it should be moved to this section to prevent confusion.
- Section 6.2 Philanthropic Agreements: This should all be in the Reference manual and re-thought out. The categories just don't connect to what is really going on in the field. Agreements with individuals and for-profit corporations needs more exploration and discussion with other partnership staff members of NPS before changes are made on agreements in the policy.
- Section 6.4 NPS Brand Management and Logo Licensing: Who in the NPS approves the "use" of the Arrowhead by philanthropic partners under an agreement? This is critical to the success of the relationship and to build and sustain credibility with the public. Historically, we have allowed "use," which essentially amounts to a non-exclusive, fee-free license. We just didn't call it licensing. Are we changing direction? I also don't see value in the negative space arrowhead.
- Section 7 Partnership Design and Construction Projects: When the partners only want to fundraise for a construction project they should not have to enter into a specific agreement, it might be authorized under the annual work plan. The starting threshold should, the \$500K regional DAB level should trigger the need for the Agreement.
- Section 8.2.2 Donor recognition plans: Third bullet will be impossible to manage by managers and coordinators. This should be a "should" or left out.
- Section 8.9 Special Events: We need better guidance on exactly when a special use permit is needed and what must be included.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 318

Author Information

Keep Private: No
Name: Rae
Organization: NPS
Organization Type: I - Unaffiliated Individual
Address: Washington, DC, DC 20024
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Line 264-8 how will the time gap between implementation and training be addressed?
Line 382 - Who will provide partner training?

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 319

Author Information

Keep Private: No
Name: Hannelore
Organization:
Organization Type: I - Unaffiliated Individual
Address:
NONE
San Diego, CA 92129-3548
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I object to any commercial advertising in National Parks. I do not object to the NPS allowing pictures or symbols of National Parks to be shown on their products but I don't wish to see any commercial signage within the parks. I also object to further privatising of park functions and concessions. Private contractors cost too much and don't have the devotion to the parks that NPS employees have.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 320

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Eagle River, AK 99577
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please no, once we go down this road we cannot go back. I realize that the budget climate is dire but we should not sell our souls to stay functioning. It is already heartbreaking to see "Sponsored by Budweiser" on the Centennial Celebration information. Fundraising should not be in the duty description of the NPS Director nor a central responsibility for park superintendents. Advertising is never "philanthropic". The public trust in the National Park Service will be as compromised as it is with our politicians.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 321

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Nashville , TN 37221
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I think it is incredibly sad that the National Park Service has to seek partnerships with corporations to meet their budget requirements instead of being appropriately funded by congress. Can we as a country not get our priorities straight? How about we take some money from the defense department and let Coca Cola put their name on smart bombs. What a terrible situation this is. We created the idea of a national park. Other countries look to us as a model of environmental protection and now in the centinial year of the first park opening we find ourselves unable or unwilling to care for our public lands appropriately. Perhaps we need the corporate sponsors to fund a lobbying campaign to ensure that congress dispenses enough money to safeguard our most treasured national assets.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 322

Author Information

Keep Private: No
Name: John
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Falls Church, VA 22044
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

No to this commercialization of the National Parks! First Big Bird and now Big Bend? Why am i finding out about this appalling news on the last night- and it hasn't been on the news everyday? Where is Obama, Sanders, Trump in all of this? I have been celebrating the 100th Anniversary of the Parks all year, beginning in February on my first trip to Arizona to Saguaro National Parka and Tumacacori. Beautiful! Please do not sell the naming rights and commercialize our parks. Reallocate funds from the War Department!

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 323

Author Information

Keep Private: No
Name: Timothy
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Mancos, CO 81328
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am a former long term seasonal Interpretative Ranger for the NPS.
In regards to this proposal- please don't.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 324

Author Information

Keep Private: No
Name: Jan
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Santa Fe, NM 87501
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I have grave concerns about this potential change in accepting corporate donations directly to any park. Corporations can currently make donations through a park's partner nonprofit group so why change what's already in place? In addition, I believe this will let the government off the hook for appropriately funding the NPS. National parks belong to the American people and should be upheld without any corporate branding. Was nothing learned from the greed of DNC (private corporation) & its trademark SNAFU in Yosemite? Corporations are bottom line focused and no good will come from a direct relationship.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 325

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bozeman, MT 59771
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Section 6.2.4 company logos have no place on our public lands. It is a disgrace to walk into visitor centers and see the Budweiser logo on signs. If logos still make it in to the order, they should be time limited, as in only displayed for a small amount of days in accordance with a special one time event. The park should come first, not the corporation. For example, the REI pop up Village at Yosemite last summer should not have been so corporation focused.

5.2.3 alcohol related brands should be taken back off the table. Having the Budweiser logo splashed all over parks does not instill public confidence.

8.1 use of logos should also be restricted as it implies preference or support of the company instead of the other way around.

8.5.2 donor recognition should not be included in interpretive programs. This is advertising, plain and simple.

Vehicles should not have company logos on them other than the arrowhead. There is a car in Yosemite that has so much Subaru logo on it the arrowhead barely fits.

8.7 use of company logos is not acceptable on public land. It implies support of that company.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 326

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Kings Canyon, CA 93633
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am opposed to the idea of allowing corporate sponsorship within National Park Service sites and within positions, exhibits, and programs. Because of this, I am opposed to Director's Order #21.

For my permanent career, I present interpretive programs. I am particularly alarmed at the language under section 8.5.2 in Director's Order #21. Within this section it states that recognition of donors may be made in interpretive programs. It says "where a donation is tied to a park or what is being interpreted, interpretive programs may identify the donor." As someone who presents interpretive programs, this is alarming. What if we have a corporate donor that is associated with an oil and gas company? What if they ask that we do not talk about climate change during our interpretive programs? What if they want us to talk about how great their company is, even if we do not agree? Do we comply? The language in the director's order says that we "may" identify the donor, but I'm not naive - if a corporation gives the park enough money, there will be pressure to do what they ask and it will no longer be an option for parks or interpretive park rangers. Here's another way to look at it: What if a donor is tied to a religious organization, and they require/ask that a park include non-science based ideas in programming (like "Intelligent Design")? It is not acceptable to ask the interpretive staff of any park to name donors or comply with topics that do not align with current accepted science.

Also in section 8.5.2 it says that "programs (education, interpretive, research, recreation, youth, or other) and positions may be named to recognize a gift made to support a program or position." My understanding of this statement is that an entire position may be funded by a private, corporate donor. Again, what if that donor is from a corporation that does not align with the same ideals and scientific integrity of the National Park Service? If that company gives a lot of money to the NPS, you can be assured that there will be pressure to research and provide programming on topics that the donor approves of.

The same goes for exhibits, logos on vehicles, interior spaces of facilities, etc. Have you thought of what happens when a company donates to the NPS and the park does not agree with what that company stands for? This is a VERY BAD IDEA. I know the NPS is hurting for money, but this is not the way to get the funding.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 327

Author Information

Keep Private: No
Name: Leonard
Organization: Hamilton Partnership for Paterson
Organization Type: I - Unaffiliated Individual
Address:

Paterson, NJ 07501
USA

E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 05/16/2016	Date Received: 05/16/2016
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

The Hamilton Partnership For Paterson, the Friends group for the Paterson Great Falls National Historical Park, appreciates the opportunity to comment on the National Park Service's proposed revision of Director's Order #21: Philanthropic Partnerships. As the NPS recognizes, the existing NPS policy on donations and philanthropy "limits the consideration and role of modern, mission-helpful, philanthropic options for NPS parks and programs." The Hamilton Partnership agrees that "updated tools," such as "contemporary donor recognition options and plans" are needed to "engage new and more diversified philanthropic partners."

These contemporary tools are especially needed for Paterson Great Falls National Historical Park, which will be a model for public-private partnerships, community engagement, and interpretation of a diverse history. This unique urban National Park will require significant private donations to develop educational, interpretative and recreational facilities. Construction of a visitor center is essential for this urban national historical park to orient visitors, introduce the Park's diverse history and significance, and contextualize the Park's numerous historic and natural resources, and engage the diverse audiences the Park Service has called for at every milestone anniversary. Contemporary donor recognition options are critical to facilitating major donations needed for a state-of-the art visitor center.

While the proposed revision of Director's Order 21 makes a number of important improvements to the NPS policies, it retains certain restrictions on donor recognition (see page 32, lines 1176-1185), imposing limitations that are not required by statute, and which may result in preventing important potential partnerships between the NPS and philanthropic organizations and donors. The proposed DO-21 places a five-year limitation on the naming of interior spaces in facilities, and prohibits structures, historic, and natural features from being named. This limitation would make it impossible to the large donations needed for Paterson's visitor center.

Nothing in any federal statute or regulation requires this restriction. While the proposed revised DO-21 generally references the Commemorative Works Act (40 USC 8901-8909), it is not applicable to Paterson. It does not apply outside of the District

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

of Columbia and its environs and this statute expressly excludes from its definition of "commemorative works" items located within the interior of a structure. Although the proposed DO-21 does not expressly tie the name recognition limitations to the Commemorative Works Act, prior NPS policy has relied upon this statute for overly restrictive requirements. Specifically, the NPS Management Policies (NPS Management Policies 2006, §9.6.1), redefines commemorative works to include features within the interior of buildings, which directly contradicts the statutory definition.

Additionally, as a basis for its policies, the proposed DO-21 cites legislation recently enacted by Congress, establishing guidelines for recognizing donations to the NPS- -the "Howard P 'Buck' McKeon National Defense Authorization Act for Fiscal Year 2015." However, that legislation gives the Secretary of the Interior discretion to determine the manner of donor recognition displays and the appropriate period of time for such recognition, taking into account the amount of the contribution and the life of the structure. This statute in no way requires a five-year, one-size-fits-all limitation on every interior naming opportunity, regardless of the amount of the donation or the needs of the specific NPS unit.

Thus, the naming of interior spaces in facilities is consistent with this statute. While the Act restricts the NPS from naming a National Park or an entire facility within a Park (including an entire visitor center) after a donor, there is no prohibition on the naming of an interior space of a visitor center or an exhibit. On the contrary, the Act grants discretion to determine the manner of donor recognition displays and the appropriate time period for such recognition. During the Senate hearing on this provision, Sen. Murkowski stated "An idea that I'd like to put forward is for donor recognition throughout the national park system. For example, we should have tasteful recognition of private donors who are willing to pay for specific maintenance backlogs projects, perhaps the naming of a room in a visitors' center, the naming of a bench." Sen. Murkowski later clarified that she does not support the naming of visitor centers. And the witness from Friends of Acadia added that "having a trail or a bench or, you know, a room would be a terrific option to have." Thus, it is clear that Congress distinguished between naming an entire visitor center and naming an interior space. As the Act shows, and the legislative history supports, the restrictions on donor recognition are tied to corporate sponsorship issues, and do not prohibit the naming of rooms or interior spaces.

As the National Park Service Advisory Board's Committee on Partnerships and Philanthropy noted in its report, donor recognition is inconsistent among parks, and the NPS should apply donor recognition best practices that are found in similar environs, such as universities and museums. Looking at these analogous institutions shows that interior naming opportunities are a useful tool for many high-profile, well-respected institutions. Examples abound:

Smithsonian Institution

- National Portrait Gallery
 - o Donald W. Reynolds Center for American Art and Portraiture
 - o Nan Tucket McEvoy Auditorium
 - o Lunder Conservation Center
- National Zoo
 - o O. Orkin Insect Zoo
 - o David M. Rubenstein Family Giant Panda Habitat
- National Museum of Natural History
 - o Samuel C. Johnson IMAX Theater
 - o David H. Koch Hall of Human Origins
- National Museum of American History
 - o Jerome and Dorothy Lemelson Center for the Study of Invention and Innovation
 - o Elizabeth MacMillan Director of the Smithsonian's National Museum of American History
- National Air and Space Museum
 - o Lockheed Martin IMAX Theater
 - o Boeing Milestones of Flight Hall
- Steven F. Udvar-Hazy Center
 - o Steven F. Udvar-Hazy made a \$65 million gift in October 1999 to the Smithsonian Institution
- National Museum of African American History and Culture

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- o Oprah Winfrey Theater
- National Museum of African Art
- o The Walt Disney-Tishman African Art Collection
- American Art Museum
- o MacMillan Education Center
- Renwick Gallery
- o Grand Salon is named after donor David M. Rubenstein
- o Other public areas and galleries recognize Nancy Brown Negley, the Robert H. Smith Family Foundation, the Bresler Foundation Inc., Debbie Frank Petersen, Hacker and Kitty Caldwell, Sheila Duignan and Mike Wilkins, the Ted Slavin Family, the James Renwick Alliance and Wendy and Jerry H. Labowitz, among others.

The above examples illustrate the contemporary standard for donor recognition. Smithsonian Institutions are federal institutions, similar to the NPS, that utilize donor recognition through the naming of interior spaces and buildings. Adoption of similar standards by the NPS would be consistent with the policies of other respected institutions, and would be consistent with the NPS's Call to Action" and its Urban Agenda that emphasize the importance of urban parks.

The Hamilton Partnership urges the NPS to consider modest revisions to proposed DO-21 to facilitate important private giving to Paterson

Although restrictions on donor recognition may be relevant to certain iconic, established National Parks, like Yosemite and Yellowstone, they are not relevant to an urban park like Paterson. They will only serve to limit fundraising opportunities that are critical to making Paterson a success. We urge the NPS to revise the proposed Director's Order 21 to allow the NPS Director or Regional Directors to make case-by-case determinations of the manner and duration of naming recognition of interior spaces, based on a fact-based finding that an essential facility could not be reasonably expected to be built without donor recognition for the duration required by a reasonable donor. Other determinative factors could include whether the park is located in an economically distressed city or area with very few likely major donors, whether the donor is a foundation or individual rather than a for-profit corporation or corporate foundation, whether the park lacks essential facilities like a visitor center in a park where such a center is essential to understanding the reason why the park was established, the extent to which the NPS has previously funded a visitor center or other essential park facilities, the size of the gift, construction and maintenance needs of the park, the duration of naming rights that other federal or charitable entities currently offer donors, and other similar factors. Such findings would give the NPS the flexibility to allow for donor recognition where funding is needed to construct essential facilities and might not otherwise be possible, while still maintaining thorough policies to ensure that the NPS philanthropic partnerships are consistent with its mission.

The Call to Action and Urban Agenda make it clear that it is a NPS priority to bring National Parks to the people, but that goal cannot be accomplished without policies that encourage private funding in the urban parks where a visitor center or other facility could not reasonably be expected to receive private donations without a longer duration for naming spaces. The five year limit on naming spaces and exhibits will make it impossible to secure seven figure donations for an essential visitor center at the Paterson Great Falls National Historical Park. Three generation naming rights is the minimum for seven figure donors contributing to fund exhibits and rooms in a poor city like Paterson. If Paterson cannot offer this, this urban national park. will be forced to turn away a multimillion gift now and there likely will not be a real visitor center in Paterson in the next ten or twenty years.

The Paterson Great Falls National Historical Park is located in a city of about 175,000 predominantly Latino, African American, and Arab American residents. This is the only national historical park that has both a National Natural Landmark and a National Historic Landmark. Alexander Hamilton chose this place to begin implementing his strategy to promote the manufacturing and immigration that would make the United States the most powerful nation the world has ever known. The Park's interpretative themes are: innovation, immigration, economic independence, renewable energy, labor, and economic opportunity. These themes speak to the times in which we live and have already begin to engage diverse audiences in our history and the environment.

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Private donors want to make seven figure donations to our visitor center now but they also want their families, children, and grandchildren to see their family name on spaces and exhibits. Now is the time to secure these donations.

Paterson's time is now. A hip hop musical about Paterson's founder Alexander Hamilton, with a record 16 Tony Award nominations this month, is the hottest ticket on Broadway. This afternoon, the top rap artist Fetty Wap, who lives in Paterson, released a new song about Victor Cruz, a Super Bowl star from Paterson who is a significant donor to our national park. And tonight in France, the Cannes Festival premiered the new movie "Paterson," starring Adam Driver (whose recent "Star Wars" role makes him one of the leading names in the movies today),

We have a once-in-a-lifetime opportunity to raise money for Paterson. Help us help Paterson.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 328

Author Information

Keep Private: No
Name: Dave
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Los Altos, CA 94022
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am absolutely against allowing commercial sponsorships in the National Park system. As experience has shown over and over, money corrupts, especially when the "money" is allowed to brand a public resource as important as our national parks. Please do not go down this path!

Do the commercial interest truly want to support the parks? Great. Most parks have charitable partners who would be happy to accept funds to do good, but without the advertising.

Respectfully,
- Dave

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 329

Author Information

Keep Private: No
Name: Cheryl
Organization: Mount Rushmore National Memorial
Organization Type: I - Unaffiliated Individual
Address: Keystone, SD 57751
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Page 6; Section 3.1.3 Authorized Employees; Lines 151-187:

Authorized employee(s) - potentially provides an opportunity for more/very timely response from park and allows for proper vetting/review of potential donations. The NPS authorized employees would/could play a larger role in working with donations. There are many small parks that do not have a very active partner group that could absolutely benefit, and there are many larger parks that have active partner groups that could benefit additionally. DO#21 references core competency and skills training to complete certification and notes that it will also be available to key partner staff. This is potentially an opportunity for a more significant level of understanding and communication. Quality training opportunities to learn skills associated with working with donations, and perhaps some will be developed by the NPS Partnership office specifically for authorized employees. It should be noted that some donors wish to donate directly to the park, not through a partner. Because some donors wish to give directly to the park, perhaps DO#21 should also contain information regarding the fact that donations directly to the NPS are tax deductible, as well.

Page 7; Section 3.1.3 Authorized Employees; Line 191:

A statement is needed as to who determines what constitutes a non-intrusive display.

Page 7; Section 3.1.3 Authorized Employees (Delegation of Authority and Thresholds); Lines 208-209:

Regional Director vets proposed donations over \$50K and up to \$250K could add some time element to vetting but understand the need.

Superintendent participation in donor cultivation meetings, a very good idea however may be difficult to implement depending on the partner group.

The vetting/acceptance consideration is vital to NPS because of potential prohibited source, litigation, integrity, public confidence, TCFO, etc.

Page 7; Section 3.1.4 Philanthropic Competencies and Skills; Line 212:

Both the NPS and partner should take the core competencies and skills course together to ensure a clear agreed upon

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understanding of the philanthropic partnership.

Page 8; Section 3.1.5 Director and Deputy Directors; Lines 227-229:

A statement is needed to determine who insures the partner attends the training. Maybe a statement that the partnership is only valid after the training has been successfully completed.

Page 9; Section 3.1.7 WASO Division Chief, Office of Partnerships and Philanthropy; Lines 271-272:

Phased donations should be stated as such prior to accepting the first donation with an understanding of the final amount.

Page 10; Section 3.1.11 Superintendents; Lines 333-335:

Include a statement that donated funds are targeted to work plan goals not just used as a guide.

Page 22 & 23; Section 6.2 Philanthropic Agreements; Lines 799-815:

In the DO#21 revised policy it only goes to clarify the length of time they have served or supported the NPS. Concerned about this setting up a situation where new groups, partner with others that have long supported the NPS and therefore call themselves "Legacy Partners". It would seem to state, only to NPS produces a loop hole that could be taken advantage of by new partner organizations. It might be better to include some statement regarding support to the NPS and Park Unit for which there is specific support with whom they want to sign the agreement. Secondly, the table in RM-21, regarding the tiered philanthropic partner levels, it seems as though there should be floors to all levels above the supporting level. Otherwise partner groups could take advantage of certain criteria as stated. For example, if a partner wanted to move from a supporting partner to legacy partner, it would be simple to qualify simply based on years of involvement with the NPS and experience of president, CEO or ED. So those two categories allow partners to easily qualify however the "real" support and commitment to NPS mission may not be fulfilled. Once those two categories are met, a partner could simply include in the annual work plan that they are committed to support 10 projects each costing \$200 for a total compensation of \$2000 and they would then qualify for the "Legacy Partner" category. Do not believe that was the intent of adding additional criteria to the requirements.

One solution could be to establish "floors" for how much a partner would have to contribute to qualify as a suitable "project" under criteria 2. The number of completed fundraising campaigns should be further defined as well. Example: During the term of the agreement, since the inception of the partner, or what qualifies the action as a true fundraising campaign. Also, this may be a good place to get those partners seeking "Legacy Partner" status to complete a feasibility study to ensure the capacity is there to perform to that level. There should be some mechanism in place to also ensure they sustain those levels and continue to meet the standard to hold that title.

Ensure there are some measures in place so that Park Units are protected and afforded some mechanism to hold the partners accountable for their involvement and contribution to the supported units. While there are some partners who feel they contribute significantly to their supporting units, the actual support is only very minimal in the NPS scope. Partners will potentially want less requirements while the NPS will want more. There should be reasonable compromise that ensures both sides end up working for the good of the Park Unit and not themselves (both Park staff and Partners).

Not having a cap on administrative fee is problematic. If a cap is removed, there should be a requirement for the partner to state their administrative fee on any promotion item, publication or material they use to promote their cause. The NPS should be able to indicate in the donor recognition plans, a requirement for the partner to illustrate the administrative fee associated with gifts and contributions. If an entity feels they meet the Legacy Partner criteria cannot perform fundraising for less than 20% of the project, they are not really at the status level to justify that partner category.

A maximum of 10 years for any partnership agreement would allow for greater flexibility for both the partner and the NPS.

Page 16; Section 4.6.2, Donation Boxes; Lines 554-571:

The revision allows for donation collection - electronic, mobile and donation boxes either by NPS or by an authorized philanthropic partner if 100% of donations will benefit the park. What is the definition of will benefit the park? Is supporting the authorized partners sustainability benefiting the park?

The inclusion of partner donation boxes would reduce the amount of funds contributed in current park donation boxes. At the very least donations would be reduced by the amount charged by the partner in administrative fees.

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If partner donation boxes allowed, a good plan to facilitate control of funds, appropriate use, etc. stated in 4.6.2.

Page 17; Section 4.6.3, Checkout Counter Donation Program; Lines 584-585:

Superintendent in control of checkout counter donation opportunities available at their park(s) is a positive action.

Page 18; Section 5, Donor Review; Lines 632-633:

How does a park determine cumulative effects of any donation across multiple regions? Will there be a park donor data base that could be reviewed?

Page 24; Section 6.3, Intellectual Property; Lines 882-883:

If the developed intellectual property included the co-development of books, that should be clearly stated here.

Page 31-32; Section 8.5.2, Donor Recognition; Lines 1153-1165:

Donor Recognition - recognition at events, bricks, benches, positions and naming:

Naming opportunities - limited to 5 years. The time period limit will need to be managed/monitored at the park and perhaps part of the authorized employees duties.

Superintendents should carefully consider the cost of maintenance and replacement of fixed recognition. Superintendents and their partners must set up an endowment or maintenance fund for this purpose (i.e. donor wall inscriptions, etc.) is something to consider when utilizing fixed recognition.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 330

Author Information

Keep Private: No
Name: Greg
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Fryeburg, ME 04037
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Allowing corporate sponsorship into our National Parks is like inviting profiteers into healthcare. (Oops, better work on that too!) Corporations are well aware that their "good will" and "community service" impact their bottom line and provide good marketing associations for consumers. What we miss as we listen to the ads for National Parks sponsored by Subaru these days is the promotion of driving, car use and fossil fuel burning. That may be good for Subaru and the oil companies that power our vehicles, but it's ultimately bad for us.

As a member of the Fryeburg Maine Water District trustees I also wish to voice my concern about corporations that claim to protect our environment because they are extracting resources from it and therefore would never damage their own source of raw materials. Here I'm referring specifically to Nestle NA Waters and it's subsidiary Poland Springs. This is a company which says it is environmental conscious because the plastic in it's bottles is thinner. However, they are still plastic and the problem has not been solved, even if the consumer is placated.

Please keep our national parks and natural places protected from profit because corporations are not people and do not think or observe the consequences that people can predict.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 331

Author Information

Keep Private: No
Name: John
Organization: National Parks Conservation Association
Organization Type: I - Unaffiliated Individual
Address: Washington, DC 20001
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

May 16, 2016

Mr. Jonathan Jarvis
Director, National Park Service
1849 C Street, NW
Washington, DC 20240

Director Jarvis:

On behalf of the National Parks Conservation Association (NPCA), thank you for the opportunity to comment on the proposed revision to Director's Order #21 (DO21). NPCA has been working to protect and enhance the National Park System for current and future generations for nearly a hundred years. On behalf of our over one million members and supporters, we express support for the intent of much of the proposed revision-and many of its specific provisions-to enhance philanthropy and partnerships. However, we also have serious concerns in several areas where we strongly feel revision, improvement, and clarification is needed.

NPCA supports the order's intent to leverage additional donations and to reduce some of the barriers to philanthropy and partnerships; in that regard we support the recommendations and concerns outlined in the comments submitted by the Public Lands Alliance.

However, we have three major concerns about National Park Service (NPS) fundraising and donor recognition, as well as additional recommendations, concerns, and areas of support. We urge NPS to provide assurances that:

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1. The goal for partnerships and philanthropy is, and will remain, to build upon a core level of funding and capacity that is foremost the responsibility of Congress;
2. Any additional responsibilities given to park leadership and staff for increasing philanthropy and partnerships must be managed carefully and should be kept within reasonable limits that do not compete with their duties under the Organic Act; and
3. Clarification and changes should be made to avoid inappropriate commercialization of parks and the agency's brand.

We appreciate the opportunity to comment on the proposed revisions to DO21. We agree with many revisions that will simplify and enhance philanthropy for the benefit of the National Park Service and System. Donations and philanthropic gifts are-and always have been-important to augment appropriated funding; we believe the revised DO21 should clearly state this important point as the existing DO21 does. Lastly, NPCA supports the proposed order's intent to allow for additional opportunities to recognize donors, but that recognition should not commercialize the park experience. National parks are places where the public's eyes can take a rest from advertising and enjoy the scenery and history-they should stay that way.

Sincerely,

Theresa Pierno
President & CEO

Comments by
National Parks Conservation Association
RE: Director's Order #21: Philanthropy and Partnerships

Submitted to the National Park Service, Office of Partnerships & Philanthropic Stewardship
May 16, 2016

National Parks Conservation Association's (NPCA) Primary Concerns

Clarify the roles of philanthropy, partnerships, and appropriations

Americans feel strongly that national parks must be adequately funded by Congress. NPCA shares this core belief and, accordingly, works to increase National Park Service funding. Therefore, we are concerned that the current language in DO21-though it may not be NPS' intent to do so-undermines the central role of congressional appropriations in meeting NPS's operations and maintenance needs.

The introduction in the current DO21 includes the following language that clarifies NPS' intent: "Donations are not to be used as offsets to appropriated funds or to meet recurring operational requirements." We are alarmed that this language was removed from the proposed revision and urge that it be restored. We also encourage NPS to identify other appropriate areas in the order where this intent can be clarified and emphasized. For example, in §7 on construction and design projects, lines 959-962 outline the reality that more philanthropists are funding construction projects. However, the provision fails to-but should-clarify that Congress still plays the primary role in addressing maintenance and capital improvements.

Clarify that NPS staff's primary duties are those outlined in the Organic Act

Solicitation of Donations:

We are concerned about an important shift from the current DO21 allowing NPS leadership to solicit donations. §3.1.1, Ethical Conduct Requirements, states: "As a matter of policy, NPS employees generally may not solicit donations. This general prohibition does not apply to the Director and Deputy Directors, who may solicit donations, directly or indirectly from private individuals or organizations for the NPS and its programs."

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NPS cites a 2001 opinion of the Assistant Attorney General, Office of Legal Counsel, regarding §403(b)(1) of the Office of Government Ethics Authorization Act of 1996. The opinion found that the law includes implied authority to solicit gifts. While we understand DO21's intent is, based on that decision, to limit that authority to NPS leadership, we remain concerned about this important shift in DO21.

NPCA feels that irrespective of any cited legal authority, proactive fundraising by NPS leadership can be an inappropriate distraction from staff duties to implement the National Park Service Organic Act to "conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Solicitation also heightens questions about impropriety, or the appearance thereof, in decisions that may affect petitioned donors.

Proactive fundraising is important and was addressed with the establishment of the National Park Foundation (NPF) as the official charity of NPS. Allowing NPS staff to fundraise threatens to confuse that critical relationship. In this regard, we respect the concerns of the Public Lands Alliance and our nonprofit partners who feel that such actions could potentially compete with their own fundraising efforts and could generate donor confusion.

We urge NPS to maintain a distinction between their role and that of NPF, but encourage and support continuing collaboration to foster greater philanthropic potential for parks. Therefore, we recommend removal of this and related provisions and that NPS revert back to the order's current language, "It is NPS policy that its employees not solicit donations."

Mandating fundraising activities for superintendents and regional directors:

We are deeply concerned about the mandates for superintendents and regional directors to engage in fundraising. §3.1.3 outlines that authorized employees "must" engage in numerous duties and §3.1.10 and 3.1.11 outline that superintendents and regional directors "will" engage in a number of fundraising responsibilities.

While we recognize that many superintendents are already actively working with partners and philanthropists to leverage donations, we feel strongly that it is inappropriate to require these activities for staff who manage and oversee our national parks. These staff are already struggling to meet the parks' mission due to insufficient funding from Congress, and we fear that requirements to engage in these extensive fundraising activities could threaten and compete with those duties.

We urge NPS to change language stating these staff "must" or "will" engage in certain activities be replaced with "should" and/or "are encouraged to."

Suggesting fundraising is a core competency for NPS staff:

In a similar vein, we are concerned about language in §3.1.4: "NPS and partner professionals with responsibilities in philanthropic partnership initiatives must have core competencies and skills to undertake and manage successful philanthropic partnerships."

We recognize that authorized NPS staff should have competency in fundraising to avoid the many ethical questions surrounding fundraising and to ensure quality, timely, and effective collaboration with relevant partners. However, we fear this language could be read to consider fundraising activities as a "core competency" for staff in decisions regarding employee review, hiring, and promotion. Therefore, we urge this language be removed or revised to address this concern.

Clarifying donor recognition provisions to avoid the commercialization of parks and the park service brand

In general, we support appropriate donor recognition efforts to better motivate philanthropists to give to NPS. We recognize
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and respect the role of these supporters, including corporate donors, in augmenting congressional support for NPS projects and programs. However, we urge NPS to ensure that these provisions do not stray too far from the allowances-but not requirements-in P.L. 113-291 §3054. We urge that NPS be mindful in its DO21 revision not to undermine the intent of that legislation to provide sideboards to the acceptability of certain recognition so as to preserve the integrity of visitor experiences.

We appreciate the various areas in §8 on Donor Recognition that seek to ensure recognition is done tastefully and does not detract from the visitor experience or the integrity of parks' historic, cultural and natural landscapes and features. However, we urge better clarification of the new areas in which recognition is provided in DO21 or, at a minimum, RM 21.

Vehicles:

P.L. 113-291 specifies that "a donor acknowledgement may be placed on a [NPS] vehicle, if the donation directly relates to the vehicle." The provision does not specify what form of recognition is allowed, and we are concerned that §8.5.2 is overly accommodating and thus threatens to commercialize the visitor experience in parks. While the language specifies that credit lines with a donor's name be short and unobtrusive, specifications we support, it also allows for logos without specifying sufficient sideboards, while also permitting vehicle wraps.

In regard to the "short, unobtrusive" nature of donor recognition on vehicles, we urge clarification of appropriate dimensions, font and related specifics in RM 21. In regard to logos, which are not addressed in P.L. 113-291, we believe that DO 21 should specify size limitations.

In regard to vehicle wraps, we feel strongly that-in general-they are inappropriate in national parks. While it is possible to limit vehicles wraps to temporary programs or to co-sponsorship events, wraps threaten to be distasteful in that they are akin to traveling billboards that would commercialize park experiences for visitors. Avoidance of wraps entirely would prevent the nuances associated with decision-making, in RM 21 or by the discretion of park staff, as to what constitutes appropriateness. Therefore, we recommend the avoidance of wraps altogether and recommend adding language specifying their prohibition.

Paving stones and park furnishings:

We recognize that P.L. 113-291 allows for acknowledgements in areas outside of a visitor or administrative facility, including benches, bricks, pathways, plazas and areas of landscaping. However, the law does not provide specific guidelines and we are concerned this order is insufficiently specific in regard to landscape features.

We appreciate and support the clarification and caution outlined in lines 1153-1165, such as not allowing logos on these types of features, but feel the language leaves too much potential for the requisite donor recognition plans to take an inappropriately liberal approach to recognition. We urge that the order, or at a minimum RM 21, outline specific limitations, such as the font and size of a donor recognition on a brick. We recommend assurances that, for example, only one brick may recognize a donor, or that entire pathways cannot be emblazoned with the name of a corporate donor along the pathway's length. Such allowances could significantly detract from the integrity of the visiting experience.

Positions programs and endowments:

We recognize the important opportunities in this provision and support it, but recommend clarifying the types of donors that are appropriate to recognize. We recommend this form of acknowledgement be limited to individuals, nonprofit partners, foundations with non-corporate names and similar entities. We recommend the provision specify that corporations should not be permitted this form of recognition, as it allows for a level of implicit advertisement that is inappropriate in our national parks.

Naming of interior spaces in facilities:

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The introductions to §8 and §8.1 outline the requirement in P.L. 113-291 that "naming rights to any unit of the National Park System or a National Park System facility, including a visitor center" not be permitted. We recommend that DO21 clearly outline that requirement that facilities cannot be named after donors. Further, we recommend clarification in §8.5.2 regarding naming of interior spaces in facilities. We appreciate the limitations outlined in this section on lines 1176-1185, and strongly advocate for setting strict limitations on font size. In this spirit, we advocate a preference for small, unobtrusive plaques at the entrance of rooms acknowledging a donor's contribution. We also respectfully urge that naming rights be limited to non-corporate partners such as nonprofits and foundations, as we fear that corporate naming rights could create an experience of commercialization for visitors.

NPS co-branding and logo licensing

We have serious concerns about §6.4. Compared to the current order, the proposed DO21 allows co-branding efforts with insufficient and vague sideboards. This provision appears to allow for licensing of all NPS marks and logos except for the arrowhead itself. This includes the negative space/outline of the arrowhead such as we see in the Find Your Park Campaign.

We urge greater specificity and restrictions in this provision so that the public does not lose faith in the NPS brand. While NPCA's mission is to support the National Park System, we recognize that integral to its preservation and enhancement is public support. Numerous polls show that NPS is one of the most popular agencies in the federal government, and indeed the NPS ranger is arguably the most popular federal civil servant. Thus we fear that the licensing of NPS logos, irrespective of the specific arrowhead restriction, could significantly degrade the NPS brand in the view of the American public, and thus threaten public support for national parks themselves.

We urge reconsideration of this provision.

Ethical safeguards

We understand the integrity of public confidence in the National Park Service relies on avoiding impropriety and the appearance thereof, so we are grateful for the many statements in the proposed order's revision outlining the importance of impartiality. We support friends groups and other nonprofit partners who argue that current and proposed restrictions can pose hurdles to philanthropic giving, and we generally support their recommendations. However, in regard to larger donations and corporate donations, we urge NPS to carefully review and, where possible, enhance the order's ethical safeguards to avoid impropriety or the appearance thereof.

NPCA's remaining concerns

Acceptance of donations from donors involved in litigation

While there are changes to the language in this section, the spirit of this section appears to be maintained, and we applaud that decision. NPCA is among many nonprofit public interest groups that engage in litigation when necessary to protect parks and that also participate in efforts to partner with NPS to foster partnership and volunteer opportunities. We encourage RM 21 to outline the circumstances in which an exception to this rule be granted. This should include exceptions for projects in a different area than the location of the litigation and/or differences in the substantive purpose for the donation and the specific topic of litigation. There are numerous instances in which nonprofits such as NPCA seek to partner with and/or donate to NPS, and we appreciate the attention to this concern.

Sponsorships

We applaud updated language in §6.5 regarding sponsorships, as they enhance NPCA efforts to partner with NPS. For example, as a part of events surrounding our Find Your Voice initiative, we often bring a corporate sponsor to the table. This language provides in-park recognition at events and would allow NPCA to work in partnership with a friends group as a part

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of a sponsorship agreement for annual, ongoing, or one-time projects.

Off-site donor recognition

We commend the inclusion in §8.4 line 1108 of digital media projects. This helps NPCA's Find Your Voice events and is a laudable means of modernizing NPS policies on donor recognition.

Corporate social responsibility (CSR)

We are encouraged at the addition of §4.4.2 recognizing the importance of companies that practice CSR. However, we concur with the concerns of the Coalition to Protect America's National Parks and other partners who note that the language is vague and needs clarification and improvement. We encourage incorporation of language throughout §8 and other relevant sections of the order that recognizes the value of corporate donors that practice CSR and that do not pose the threat of diluting the ethical and responsible image of NPS in the public's eye. We generally support the Coalition's recommendation that NPS specify the advantages of partnerships with responsible donors. We recommend DO 21 provide greater clarification as to its intent to leverage responsible partnerships and provide more specific guidance to NPS staff on ethical decision-making as to the companies with whom it elects to partner.

Additional provisions:

As stated in our introduction, we generally support the recommendations of the Public Lands Alliance and other nonprofit partners that DO 21 improve upon its effort to reduce barriers for nonprofit support groups to effectively and efficiently partner with NPS to leverage donations. We recommend that a final revision of DO 21 pay more granular attention to these recommendations that are important not only for leveraging needed donations, but also for enhancing long-term local partnerships and local and national public support and enthusiasm for NPS. Specifically, we support these concerns and recommendations:

- NPS should be less stringent in requirements about vetting of donations to nonprofit partners. We concur they should not be as strict as those donations directly to NPS, particularly for smaller donations and those to well-established public-interest nonprofits;
- Ensure that NPS web-based fundraising activities do not compete with nonprofit efforts to solicit donations;
- In the case of smaller partners, simplify agreements -such as primary agreements, educational services agreements, and cooperating association agreements-and extend their duration;
- Allow partners flexibility in managing non-construction centennial challenge funds (§7) so that funds need not be immediately transferred to the federal government so that partners can instead responsibly manage these funds;
- Simplify the design competition board review process;
- We support the addition of authorized philanthropic partner events to the list of special events;
- We support their concerns regarding NPS ownership of intellectual property after a project. These could include educational curriculum and other property developed by partners that they should be able to retain;
- Allow for expanding the length of contracts for philanthropic partner agreements; and
- Support their concerns regarding the checkout counter donation program, that NPS should not revoke the grandfathered practice of concessioners providing guest donations directly to a nonprofit partner rather than going through the National Park Foundation.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 332

Author Information

Keep Private: No
Name: Trevor
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Portland, ME 04101
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

As a lover of our national parks, and a believer that they need to be preserved for all, I urge all involved to fully fund our parks through public money, and never from private corporations. If corporations want to donate money without ANY strings attached, I suppose that would be okay, but that is almost never what happens.

Keep corporations and commercialization OUT OF OUR NATIONAL PARKS! Keep them free of naming rights (Coca Cola National Park?! NO!), and from any influence over park policies.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 333

Author Information

Keep Private: No
Name: N/A N/A
Organization: Wolf Trap Foundation for the Performing Arts
Organization Type: I - Unaffiliated Individual
Address:
Vienna, VA 22182
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

We appreciate the opportunity to offer comments on Director's Order #21.
Regarding section 7 Partnership Design and Construction Projects: We generally agree with these conditions. In our reading of this section, however, we do not see a framework for NPS and partners to work together to address other types of acute or emergent capital needs as opportunities may arise. For example, over the years we have, from time to time and in consultation with NPS, provided funding and support for capital projects such as turf or deck refurbishment for the benefit of all Park visitors. We encourage the final Director's Order 21 to find a way to allow NPS and Park Partners the flexibility to execute nimbly and quickly on mutually agreed-upon capital projects that may or may not be included as part of an approved annual or five-year capital plan.

Thank you.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 334

Author Information

Keep Private: No
Name: Rebecca
Organization: Ms.
Organization Type: I - Unaffiliated Individual
Address:
Coppell, TX 75019
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Coupling with brands is a slippery slope.....donations without strings.....NO MORE.....do not let money rule us. Keep our national parks national.....

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 335

Author Information

Keep Private: No
Name: James
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Trout Creek, MT 59874
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

From their inception, our national parks were created and preserved not as a capital venture, but instead as a sanctuary where we, the people, could view a world that once was. The National Park Service's mission is to protect our natural history, our human history, for the enjoyment, education, and inspiration of this and future generations. The mission statement does not say that our parks are to be sold or exploited for capitalistic gain. To do so, would cheapen the natural wonders the National Park System was created to protect.

The most important reason to prevent corporations from gaining a foothold into our national parks is that the public would be offended by the commercialization. Allowing corporate sponsorship of our parks, would denigrate our natural wonders with the greed the vast majority of the visiting public is seeking to escape.

"Philanthropic partnerships" sound like a noble cause, but the ultimate goal is not benevolence, but greed and access to the consumer. Global corporations should certainly be permitted to contribute to the funding of our nation's national parks, but that donation should never include permission to advertise within park boundaries.

Funding shortfalls should be corrected at the legislative and executive branches of government. If current representation fails to financially support the National Park system, then the public needs to be educated and become proactive in helping to pass legislation to help fund our parks.

Our national parks carry 100 years of a rich and proud tradition. The National Park Service should be here to protect the natural wonders of this nation, and to preserve our human history. Yet here in the centennial year, our parks are being threatened with the prospect of being sold to the highest bidder and allowing a commercial interest invasion.

There should be no apologies-the mission of the National Park Service is a noble one. We should never allow gross commercialization on our watch.

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

Thank you
james

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 336

Author Information

Keep Private: No
Name: Heidi
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Winkelman, AZ 85192
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Dear NPS,

National Parks are meant for people to get away from commercialization, not be bombarded by it. Please leave parks for nature, for people to experience the historic buildings and visitor centers and buses completely devoid of corporate logos. I understand that you need money, but this seems like selling out. I do not want to visit Yellowstone to see Trojan Condoms and Viagra advertisements. I do not want to visit Grand Canyon and see Coca Cola logos and advertisements and logos for guns. It's simply not right and it opens the door for corporations to swindle what they want from the NPS. What if, for instance, Cabelas will offer the North Rim 3 million dollars if only the bison there are given a watering trough that runs the length of the boundary fence? What if a big oil company will give you 5 million dollars if only they can drill in the Everglades? This is a very fine line you're walking here with my public lands, and I don't like it. Please do not sell out and turn the nation's best idea into an ad trap.

Sincerely,

Heidi

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 337

Author Information

Keep Private: No
Name: Karissa
Organization: National Park Service
Organization Type: I - Unaffiliated Individual
Address:
Washington, DC 20005
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Thank you for the opportunity to comment on the Draft DO #21 Philanthropic Partnerships.

Overall the order is a much needed update to policy that has grown out of touch with modern philanthropic terms, practices and fundraising mechanisms.

Lines 121-123 Indicating clearly that NPS employee may express support for authorized fundraising efforts of philanthropic partners is incredibly important. Many field employees reference section 3.1.2 General Prohibition on Solicitation by Employees in error as guidance that extends beyond solicitation of donations-and opportunities to share quality information or awareness of campaigns have likely been missed.

Lines 135-136 Excellent to see plainly that NPS employees can join or donate to authorized philanthropic partners. Once again, many field employees reference section 3.1.2 General Prohibition on Solicitation by Employees in error as guidance that extends beyond solicitation of donations-and opportunities to personally get involved are avoided mistakenly.

Line 196-198 It is very important that NPS perspectives are included in donor cultivation to ensure alignments of needs and gifts. The plain indication that participation in such activities is allowable by authorized employees is important to developing healthy philanthropic partnerships.

Lines 366-370 The inclusion of a variety of philanthropic partners under appropriate agreements as fundraising entities is inclusive and inviting. This is an excellent way to encourage fledgling groups to test their skills in a dedicated way; or for direct support of matters by the community (strategic fundraising partners) directly related without burdensome agreement requirements intentioned for longer term commitments as the only way to garner support.

Line 383 The direct indication that philanthropic partners can describe NPS-identified needs to the public is helpful-perhaps adding the or underscoring that NPS Subject Matter Experts may be available to help in the accompanying RM would further

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

support the collaborative effort codified in the work plan.

Lines 436-439 It is nice to see that permanent employees could be funded in a manner that echoes permanent employees funded via Rec Fee monies. However, I recommend further requirements/best practices be developed in the RM as funding may be limited or cyclic in nature and prudence necessitates parks and programs be fully prepared to fund permanent employees regardless of donation availability.

Section 4.3 Any concerns as to the commercialization of parks and programs are well addressed in this section. Particularly lines 471-472 indicate that in well managed relationships, items of concern should be able to be reasonably addressed internally before external distribution. Additional examples and guidance in the RM will be very helpful in reviewing all points in section 4.3 appropriately.

Line 513 Please update with the most current annual volunteer numbers and hours-this has jumped significantly.

Section 4.7.1 Excellent to see crowdfunding expressly treated as an option to seek donations by authorized philanthropic partners as well as the authority to allow for use of a portion of funds for administrative costs. General guidance as to reasonable administrative costs may be helpful to indicate in the RM to avoid lopsided arrangements.

Lines 1029-1030 The clear language indicating there will be no naming of NPS units or facilities is welcome and further protects from commercialization. In light of recent concerns over facility names at Yosemite, this is well worth the direct clarification and even further discussion in the RM.

Donor recognition options are tasteful and reflect the best practices and standards applied throughout the field of philanthropy and fundraising. Though cautious in approach, a good balance between all parties involved is spelled out via proper agreements throughout this Draft DO #21 for heading into a second century of philanthropic partnerships that aligns mission and needs demonstrating a winning public lands scenario throughout the National Park System.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 338

Author Information

Keep Private: No
Name: Schurkey
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Grand Forks, ND 58201
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

HELL NO! NO Corporate "Donor Recognition" (i.e., DAMNED ADVERTISING) should be permitted.

Better to be under-funded than to allow the corporate take-over of We The People's park system. Corporations have too much power, and too much reach, and there's too much propaganda already. DO NOT allow them to have even more.

Reject the dollars, keep the integrity.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 339

Author Information

Keep Private: No
Name: E
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Cupertino , CA 95014
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Do not - under any circumstances - think that my family would be pleased to have any corporate sponsorship of our national parks in exchange for naming rights.
Yosemite and curry village will remain a disaster to us native Californian.
No. No. No. No No. No.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 340

Author Information

Keep Private: No
Name: Robert
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Wichita, KS 67212
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

This proposal is, as T.R. might have said, an abomination. It's appalling that corporate interests are managing once again to buy their way into the national parks; it's far more appalling that the NPS "leadership" would support it. We've been through this before, decades ago, when commercialization was thrown out of Yosemite. I guess as our newer generations take over in government and start down this path, they'll be promoted instead of the more appropriate action of being fired. I have seen no public appeal for funding (how about 1 dollar per person?) that would result in what? over 200 million dollars? Let's try some innovation, people.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 341

Author Information

Keep Private: No
Name: N/A N/A
Organization: The Corps Network
Organization Type: I - Unaffiliated Individual
Address: Washington, DC 20002
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Section 6 Public-Private Partnerships; Page Numbers 21, 22, 23; Line Numbers 774, 833

Dear Director Jarvis,

Thank you for the opportunity to comment on the draft Director's Order #21 and for your efforts in updating this order to reflect emerging partnerships and agreements between organizations like Corps and the National Park Service.

We appreciate the identification of one of our oldest and well-respected members, Student Conservation Association (SCA), as an example of a "Strategic Philanthropic Partner" in the Philanthropic Partnerships section on Page 22, line 774 and the recognition of the important role organizations like SCA, The Corps Network, and our Member-Corps may play in advocating for park or program resources; recruiting and managing volunteers; and creating pathways to additional sources of funding for parks.

The Corps Network and our members look forward to future strategic partnerships together to meet shared goals and mission along with managing volunteers and advocating for additional park resources in the future as a result of this revised order. To that effect, we also know that even with shorter-term "fundraising" and associated advocacy and philanthropic activity, multiple year agreements are needed to effectively carry out these activities and so respectfully request you revise the term of agreements for Strategic Philanthropic Partners to recognize multi-year agreements instead of the proposed "term of a Strategic Fundraising Agreement is one year" on Page 23 line 833. The fundraising, advocacy, or volunteer management process is a multi-year public-private partnership and often requires significant planning and development time in order to be most effective.

We also respectfully urge your recognition of other Strategic Philanthropic Partners in this revision, like the Corps Network or our Member-Corps, that perform advocacy for park and program resources and may help to manage and recruit volunteers so that NPS staff have a greater understanding of the full partnership potential of Corps.

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As the National Park Service approaches its 100th anniversary, we applaud your focus on engaging the next generation in the Great Outdoors, cultivating under-served populations as visitors and stewards, and creating new career pathways. We also applaud your focus on identifying new ways to engage strategic partners in advocating and supporting the parks.

We again respectfully urge your consideration of multi-year Strategic Fundraising Agreements, and the recognition the Corps Network and our Member-Corps as Strategic Philanthropic Partners. We look forward to continuing our important partnerships in the future and supporting NPS for the next 100 years.

Sincerely,

Mary
President & CEO
The Corps Network

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 342

Author Information

Keep Private: No
Name: Catherine
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Grand Canyon, AZ 86023
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Please do not allow commercialization, corporate advertising, or corporate influence in our National Park System! I am a ranger, and I know the need for funding is desperate, but this would be a sell out of the high standards our National Parks have held and the public expects. It is such a relief to enter a park and for a while be free from advertising and commercialism. If corporations want to contribute, let them, and then let them toot their own horn if they want but it should be made clear that the standards of the NPS will not allow advertisement in the parks as a perk for their donation. If so, it is clearly not philanthropy they seek but national and international audiences for their financial benefit. This will degrade the integrity of the service and the parks' purpose. It would be a severe, long-lasting and perhaps irreversible disappointment.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 343

Author Information

Keep Private: No
Name: Jill
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Rohnert Park, CA 94928
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I am not in favor of this proposal. What starts as discreet recognition will quickly become advertising and manipulative brand marketing. Corporations are not trustworthy philanthropists - in fact, they aren't people, despite what the supreme court wants you to think. The National Parks belong to the public. I go into nature to get away from the manmade constructs that bombard me to extremes out in the social world. I would be sad to find it following me into the wild. Please reconsider and do not adopt this policy. The public does not want it in their precious natural environment.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 344

Author Information

Keep Private: No
Name: fran
Organization:
Organization Type: I - Unaffiliated Individual
Address:
walnut creek, CA 94597
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

National Parks on beer cans and wine bottles. I missed that. And Coca Cola forcing the a halt on the ban of plastic water bottles. Yosemite Park lost the names of landmarks to its hospitality company through some stupid oversight. Please please DO NOT SELL and COMMERCIALIZE our parks! Its bad enough local landmarks here in the SF Bay area have had name changes like PacBell park for the baseball field and lost their identities. The National Park landmarks at least should remain free of Kodak moments (take picture here, sponsored by Kodak, i remember those at...DISNEYLAND...) Stores,hotels, OK, change their names to XYZ by Sony or Disney or Coca Cola...but dont let them buy signs or ads space at Old Faithful or the Lincoln Memorial or Muir Woods or.. you get my drift.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 345

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Rohnert Park, CA 94928
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Do not sell off the National Parks to corporations they have already screwed up enough of this country. Keep the parks as natural as they can be without littering them with corporate logos on anything. I agree with them contributing if they choose, but with no advertising rights.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 346

Author Information

Keep Private: No
Name: James
Organization:
Organization Type: I - Unaffiliated Individual
Address: 2219 California St NW
Apt 33
Washington, DC 20008-3913
USA
E-mail: james_pepper@msn.com

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Generally, this is an excellent first effort in revising Director's Order 21 to engage the National Park Service with partners seeking to permit the Service to achieve the Mission of the Act of 1916 despite gridlock, while preserving the integrity of the Service and System.

These brief comments will therefore focus primarily on misdirected recommendations that will be inadequate. In view of the attention being given to objections from third parties that misunderstand the objectives or the process, some points of support will try to counteract these erroneous criticisms.

Broadly, the greatest flaw to draft Director's Order ("DO") is that it appears to be a mash-up of provisions recommended by non-NPS professionals (probably VIP friends group with influence disproportionate to their actual representation) colliding with professionally conceived and drafted portions. Ideally, partners do what they do best, which is not to be the National Park Service but to reach out in ways where the NPS is not at its best, and the NPS should do what it does best. As with recommendations such as the Partnership Council, or with projects such as the recent St. Louis Arch project, when interests who do not completely understand the nature and responsibilities of the federal government have it in their minds that they can run the parks better than the Service is when the inherent advantages of partnership break down, when the partner is trying to "show the government how things should be done," is when things break down. So too in the more convoluted portions of the draft DO. As much as one appreciates the desire of the NPS to demonstrate good faith, there are tasks that are inherently governmental. Drafting Director's Orders is one of them, and thinking through the logic and actually testing the untested instincts of assertive people with narrow interests.

But there is no reason why the needs of the partners cannot be met, the flaw is when bias based on exasperation is permitted to allow unskilled people to draft government policy documents.

Section 6.2 is the largest such flaw, because the categories "Supporting Partners", "Premier Partners" and "Legacy Partners"

Correspondences - Director's Order #21: Philanthropic Partnerships - PEPC ID: 60882

and the latitude provided each is an arbitrary solution, and will not solve the real problem facing the parks and partners. A few long time, VIP partners are aggrieved that they must get agreement approvals to act in lieu of or in an agency relationship with the NPS. The NPS is apprehensive when it sees inexperienced NPS staff/superintendents working with inexperienced but headstrong partners. The superintendent cannot read a business plan, the partner does not understand the reasons for government accountability.

The VIPs think they are delayed in moving forward because they need agreement review required of the inexperienced, and assume that nationwide document templates, long term agreements is the solution. It is not. Terms of agreements should be based on the plan, and the levels of accountability based on a plan's requirements. Some projects by new partners, by the nature of the plan and objective, take time. Some partners, by their nature have a sustaining program - - such as the Yosemite friends group - - that by its nature is effectively permanent. In short, the term must be based on the objectives of the partnership. The levels of accountability on the points of vulnerability. It is entirely conceivable a new partnership with extremely talented and experienced people - - although not a long-time NPS partnership - - could be lost because the nature of the partnership is one-project centered. A partner putting together an essential education center for a new park, one that will require a long-term operating agreement and a extended period of loyalty and recognition to a donor is an example. Losing such a project because of the hubris and sense of entitlement of a VIP is not in the interest of the Service.

However, the agreement solves some of the problems the VIPs are aggrieved about. You provide for training of Service personnel, an important need. You provide for no new Solicitor review for every agreement so long as it follows the template, this is a blessing. The Solicitors have been taking a policy position on partnerships, and the fear and risk aversion of Solicitors when they get involved with policy and operations is extreme, and destructive of the sort of skilled and rapid decision making park managers and senior managers do every day.

- - Section 8.5.2, lines 1176-1185, Naming of interior spaces in facilities, is another example where a cookie cutter solution misses the point of the problem.

Naming rights for interior spaces also must vary based on the nature of the substance of the project and purpose of the donation.

I appreciate that the entire thrust of this draft DO is because the NPS has been told that it does not receive full value when it receives donations. NPS has sought out advice from Smithsonian and corporate philanthropic groups to seek comps and determine value of naming. But there are many more parks than museums. Museums largely are existing buildings and providing naming opportunities in rooms is the sort of thing this policy would better describe. Parks and their charisma are not the same, and cannot be put on the same plain as they are here.

- - As to using Smithsonian experience as the basis for NPS evaluation: there are many more national parks than Smithsonian museums. Supply-Demand is real and affects access to donors.

- - As to donors as apples and oranges: All parks do not have the same national charisma, of the sort that attracts corporations. A transformative donation at a park like Paterson Great Falls is in every respect, substantially different than an equal donation at Golden Gate or Yosemite, and each also with a very different donor base.

- - Superintendent's should be able to assess the different TERMS of a donation by the life-span of the facility. The Lincoln Center problem would have been avoided with a right of first refusal for the original donor, who was shocked to wake up and learn the Koch's took over their building. On the other hand, Lincoln Center (or the NPS) would be right to observe that the original theater needed to be rebuilt, and the value of the original donation had ended.

An ongoing donation is entirely different from a foundation donation(S) of an essential park facility. They must be treated differently in naming rights.

- - Therefore, terms for naming rights should not be arbitrary, but be based on the life-span of the development, and the capacity of that park to attract donations.

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- - There needs to be a distinction between a rebuild or cyclic maintenance to trigger a name change.
- - If at the end of the life expectancy, either because the facility reached its term as anticipated or because in its previous configuration it no longer meets the needs of the NPS, the original donor or assigns should have the opportunity of first refusal to fund the rebuild and continue the name.
- - Yes, there is always the concern that the NPS will low-ball the value of the park.
- - But arbitrary standards like 5 or 10 years are likely less realistic than the judgement of a superintendent at a Blackstone Valley National Historical Park or the superintendent of a Yosemite.

For non-substantive donations (IE: such as naming of a room not built by the donation), a term makes more sense, but 5-year term is unrealistic under any scenario.

No one donates for a naming opportunity for 5 years. Yes, for having a film they made, or just seeking momentary recognition for other reasons. Room-naming is not ideal for such donors anyway. But there needs to be flexibility again. For the Met or the Smithsonian a million dollars, as with Yosemite or Golden Gate, practically nothing. But for a small or new park, a million could be vital and requires special consideration.

SECTION 3.3.7 WASO DIVISION CHIEF, OFFICE OF PARTNERSHIPS AND PHILANTHROPY and SECTION 3.1.10 REGIONAL DIRECTORS

Third party critics object to provisions on Lines 262 and 309 that include support for both partnerships generally and philanthropic partnerships. This betrays a vast lack of field-based partner experience, if it is not simply hostile to fundraising for the NPS.

It has been observed repeatedly, including by individuals within the critic organization that "First you friend-raise, before you fund-raise." Partnership is a continuum. The motivations of the partners range over many ways of collaboration that they are inextricable. If a Regional Director is teaching her or his direct reports to appreciate the need of the NPS for partners, those direct reports need to learn that proper treatment of partners in one context may very often lead to partner fundraising for another.

Clearly, these are specious objections. That these (and there are several objections that everywhere the word "partnership" is used it must for consistency be modified by "philanthropic") objections are either arcane or designed to undermine can be seen by the extremes. Claiming for example of Line 340, relating for Superintendents submitting a proposed donation for vetting, is obscure when it uses the word 'determination,' thus "Determination of what? Where is 'determination' defined' when very clearly for WASO and Regions elsewhere it identifies vetting responsibilities.

SECTION 3.1.4 PHILANTHROPIC COMPETENCIES AND SKILLS, and, SECTION 3.1.11 LINES 327 - 349

Most troubling are objections to training ! It appears that partners working with the NPS will raise an amount equal to 1/5 of the National Park Budget, and more than double the line item construction appropriation. These existing functions require training. The notion that fundraising on this scale does not require training, that it is a burden, or is unlikely to be funded is again specious. If partners know training is needed they may even help fund it.

The objection also has been circulating that the requirement for superintendent training should ONLY be when that superintendent is actually "ENGAGED" in philanthropy. Again, wrong headed and impractical, again betraying a deep lack of knowledge of what happens in the field in fund and friend-raising. The superintendent must have the training BEFORE being approached by the partner, just as the superintendent must have training in dealing with harassment BEFORE the abuse happens. More than that, the lack of understanding that partnership generally and fundraising are inextricably linked, as simply different manifestations of the larger public desire to enhance the parks, is the reason the critics do not realize that superintendents must have these skills in advance.

What is at stake is the role of the superintendent as a thinking manager. These critics, and to some extent the VIP partners, seem to ignore that although quality control must create a consistently excellent System of parks, in fact, every day superintendents make different decisions based on the needs of the particular resources and visitor needs. The critics suggest pushing decisions to Washington to get consistency. In fact the experience of the Service is that decisions from afar often are the ones that do not meet the needs and reduce the excellence that can be better tuned locally by trained and understanding managers.

Finally, the Service needs to understand as it argues for these and other partnership policies that it is not really about the money. It is about citizenship and democracy. The NPS is stronger and smarter when it works closely with others. Parks are more responsive to the needs of the American people, and the American people better understand the needs of the parks. Although many of the critics spent much of their career in central offices, it is not understood by the critics that the NPS working in a vacuum does not make the NPS strong. Without the support of the American people there will be no parks in the future.

People who participate support what they participate in every way.

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 347

Author Information

Keep Private: No
Name: Robert
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Anchorage, AK 99516
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Hey this is a terrible idea. Most kids think of parks as boring versions of disneyland already- -the comparison will be even more valid if you do this....

PEPC Project ID: 60882, DocumentID: 71886

Correspondence: 348

Author Information

Keep Private: No
Name: Marc
Organization: REI
Organization Type: I - Unaffiliated Individual
Address: Director, Government & Community Affairs
Kent, WA 98032
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/16/2016 Date Received: 05/16/2016
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

REI (Recreational Equipment, Inc.) appreciates this opportunity to submit its support for and comments on proposed revisions to Director's Order #21. The proposed Order notes that philanthropy has long supported the Park System in any number of ways, and that in today's day and age the Park System needs to take a more agile approach in working with donors, sponsors and other supportive organizations. Given increasing visitation at some Parks, chronically tight budgets, maintenance backlogs and awareness-raising needs at lesser known Parks, REI agrees - - there is ample need for the Park Service as a whole to find greater flexibility in its partnerships. At the same time, REI fully supports the core principle emphasized throughout the draft Order - - that commercialization of any Park is to be avoided even as new partnerships and recognition of those partnerships are enabled.

REI has a long tradition of collaborating with individual Parks, with NPS and with the National Park Foundation to promote common goals. The co-op's mission is to inspire, educate, and outfit our members for a lifetime of outdoor adventure and stewardship. The National Park System contains some of this country's - and arguably the world's - - most adventurous and inspiring places. At the co-op, we pride ourselves on helping people of all backgrounds and capabilities discover the wonders of National Parks, whether those parks are nearby, among the most heavily visited and iconic, or more remote.

In many ways, you can say that REI was born in a National Park, since the co-op's founders, Lloyd and Mary Anderson, started importing quality climbing gear and selling it under a cooperative business model in order to help friends and fellow adventurers climb Mt. Rainier. This same adoration for and belief in our Park System motivated the co-op to assemble the resources that have made it a top-tier sponsor of this year's National Park Service Centennial. In furtherance of the Centennial goals, REI has: 1) developed a mobile app aimed at crowd-sourcing information on great places to visit in the Park System; 2) sponsored an IMAX movie celebrating the Parks; 3) promoted the Centennial in our physical stores, our catalogues and digital assets; 4) designed classes, programs and adventure-travel trips that introduce people to the Parks' wonders; 5) developed Centennial-branded products which, in turn, generate contributions for the Parks and the Centennial; and 6) facilitated stewardship projects, philanthropy for others' stewardship, and grants for awareness-raising about the Parks among

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diverse audiences. The multi-prong effort should result in multiple millions in cash and in-kind contributions to the Find Your Park campaign and for Park-related needs.

Modifications to D.O. #21 come at an appropriate time, as the Park System deliberately evolves itself for its next century. Through REI's own engagement with Parks around the country, we see first-hand the challenges of a System marked by some heavily utilized places, many less well-known and less visited but equally compelling places, often coupled with staffing, funding and maintenance shortfalls. A company like REI - dedicated to enhancing quality of life via outdoor experiences - looks forward to partnering with NPS, NPF and individual Parks into the future. And certainly, more well-tailored partnership and sponsorship arrangements can make that happen. The NPS and staff should be applauded for advancing this update to the Order.

As to specific comments, REI has one major point to raise, as well as several smaller ones. Our major comment relates to the distinction between Philanthropy (gift giving to advance the common good) on the one hand and Sponsorships (the funding of a project or program for marketing purposes), on the other. The draft Order's definition says that "Sponsorship is not the same as Philanthropy." REI urges NPS to tweak this definition in order to recognize that some sponsorships can have a philanthropic component or even core. There is not always a strict bifurcation between activities that have a sponsorship and marketing quality and those that have a philanthropic quality. REI's sponsorship of the Centennial, we believe, falls in this hybrid space, where so many of our activities are aimed at supporting the cause of the Centennial and the longevity of the Parks, with much lower expectations for marketing value.

A revised definition might read: "While in general the sponsorship of a program or project might not be considered philanthropy, partnerships can be established that contain a measure of both." This edit to the definition would assure that entities which engage NPS mostly by supporting programs and projects - as REI traditionally has - can still benefit from the updates to the Order. Put another way, we look to avoid semantic conversations about whether a particular undertaking is philanthropic in nature, and thus the beneficiary of most of D.O. #21, or whether it is a sponsorship and thereby excluded from much of D.O. #21. By recognizing hybrid relationships, the exact nature of the relationship can be worked out in individual agreements.

As to other elements of the Draft, we recommend:

- At Section 5.2.2, clarify that actions taken to enable fundraising on behalf of a Park or Parks do not violate the general rule requiring impartiality. This is to avoid confusion in execution of fundraising efforts.
- At Section 6.4, clarify whether the arrowhead mark can ever appear, with prior NPS approval, alongside third-party marks. This is to enable third parties to print or display the arrowhead, but subject to NPS control.
- At Section 6.4, revisit the language requiring a written accounting of revenues and expenses associated with NPS marks or logos. This should be an optional or recommended element of an agreement, not mandatory, given the complexity of disaggregating some co-branding efforts.
- At Section 8.5.2, clarify that vehicle wraps and stickers can be used when an NPS vehicle is "used in support of an event." The draft language suggests wraps only can be used if the vehicle itself was donated.

Each of these modifications is intended to provide NPS further agility in entering short and long term arrangements with organizations like REI that are so deeply engaged with and committed to the health of the Park System. Thank you.

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