



September 27, 2016

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National Park Service
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Reginald Chapple
Division Chief, Office of Partnerships & Philanthropic Stewardship
National Park Service
1201 Eye Street, NW Room 933
Washington, DC 20005

Dear Mr. Reinbold and Mr. Chapple ,

The revision of Director's Order #21 (DO21) conflicts with the mission of the National Park Service (NPS), which is 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." Allowing obvious corporate recognition inside of parks would permanently change the essence of parks, and forever tarnish the unique natural experience that national parks offer. As discussed below, those who filed public comments to the order with the NPS overwhelmingly oppose this change.

Concerns with Director's Order #21: Philanthropic Partnerships

In response to your request for specific concerns that our members have regarding the revision of DO21, we have outlined each topic with relevant provisions that we feel would permit an inappropriate incursion of commercialism into America's national parks:

- **Role of Superintendents in Fundraising**

Under the current policy, superintendents are not required to devote large amounts of time to fundraising or soliciting corporate donations. Lines 329-335 of the revision require superintendents to dedicate undefined amounts of work to solicit donations and influence donors by acting as "experts," and specify that they must "provide helpful context and content as the partner solicits donations."

The long list of new fundraising job duties (lines 329-343) and the required fundraising training certification program (lines 213-214) will be time consuming and will distract from superintendents' main responsibility—to manage their parks. It is not clear how much time superintendents are expected to dedicate to soliciting contributions, but DO21

implies that fundraising duties will be a core responsibility of superintendents. We are also concerned that superintendents will be hired, assessed, and rewarded based on their fundraising capabilities and not their abilities to effectively manage parks and further the mission of the NPS.

The concern is not just with the allocation of superintendents' limited time. If they are required to solicit and obtain funding from corporate partners, they will inevitably prioritize management decisions designed to please corporate funders over potentially competing considerations for visitors, integrity of the parks, and protection of our natural resources.

Superintendents should continue to serve as strong park managers, without the added time consuming job requirement of performing corporate fundraising duties.

- **Alcohol**

As it presently stands, NPS policy (see page 15) *prohibits* campaigns which involve alcohol or tobacco products. The proposed revision removes that prohibition and expressly authorizes partnerships with alcohol sellers (lines 648-650). Partnering with alcohol corporations is bad for public health. Numerous studies show¹ that the more alcohol advertisements that youth are exposed to, the more likely they are to drink and to drink in excess. Allowing partnerships with alcohol corporations disregards public health and puts youth at risk.

Additionally, for those struggling with or who have overcome substance abuse problems, seeing logos of alcohol companies while attempting to enjoy solitude in national parks could negatively impact their visitor experience and health.

Frankly, like many of our members, we are shocked that the United States of America proposes partnering with alcohol sellers and giving them a marketing presence in our national parks. We urge you to maintain the current ban on alcohol partnerships and marketing arrangements. Alcohol sellers have no shortage of avenues for advertising their products. Surely the National Park Service should not be partnering with alcohol corporations to promote alcohol consumption.

- **Naming of indoor spaces**

Naming rights, as defined in lines 1176-1185, are a common public concern about DO21. The entire concept is contrary to the NPS's mission and the expectation of park users. These are *our* parks and preserved by our nation for use by us and by future generations. No part of them should be co-opted by a for-profit corporation for their own marketing.

Allowing corporations naming rights to indoor spaces could also result in corporate influence on park policy. Disproportionate attention could be devoted to indoor spaces for the sake of pleasing corporate investors, at the expense of maintenance and promotion of other national park assets.

- **In-Park recognition**

Recognizing corporate donors on vehicles and park furnishings including bricks, paving stones, pathways and landscaped areas (lines 1150-1165) would introduce an unprecedented and intrusive form of commercialism. By allowing corporate logos and slogans on park property, NPS is effectively using resources that belong to all Americans to advertise for corporations.

- **Co-branding**

Lines 1023-1030 state that, “a donor acknowledgement will not be used to state or imply... a National Park Service endorsement of the donor or any product or service of the donor.” However, allowing any form of visible corporate recognition is an implied endorsement by NPS of a brand. From the advertisers’ point of view, the entire purpose of co-branding is to affiliate their brand with the positive profile of the National Park Service. Co-branding would offer an especially strong implicit endorsement of a product or brand by NPS, and could have lasting consequences if a co-branded corporation engages in any form of wrongdoing. This problem is built into the co-branding model, and can only be avoided by rejecting the model altogether.

Existing policy: Director’s Order #21: Donations and Fundraising

We note various protections against commercialism stated in the present policy which have been removed from the revised policy. These important protections should remain.

The existing policy, Director’s Order #21: Donations and Fundraising explicitly states on page 21, “to maintain NPS policy that parks be free of commercialism, advertising and marketing slogans and taglines may not appear under any circumstances.”² We feel strongly that this line should continue to be prominent in any future policy for the lifetime of the National Park Service.

Additional provisions in the existing policy that we encourage NPS to put back into the policy going forward include the following, for reasons discussed above:

- “Corporate campaigns which identify the NPS with alcohol or tobacco products will not be authorized.” p. 15
- “Donor recognition is not allowed on motor vehicles or on bricks, benches or other park furnishings.” p. 21
- “The naming of rooms, features, or park facilities will not be used to recognize monetary or in-kind donations to a park or the NPS.” p. 23³

Public Comments

In response to our Freedom of Information Act request, we have obtained copies of the public comments filed with the NPS regarding DO21. We have reviewed those comments, and they make clear that the public is already outraged about many of the existing forms of commercialism in America’s national parks, and strongly opposed to the proposed changes which would allow more commercialism in our national parks. *Eighty percent of the public*

comments filed oppose DO21. NPS should take these comments seriously and not move forward with the revision as it is currently written.

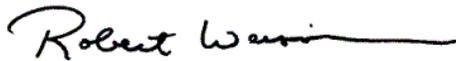
Under the revision of DO21, national parks are at great risk of becoming platforms for brand and product placement, ultimately turning our public lands into venues for advertisements. The proposed revision of Director's Order #21: Philanthropic Partnerships would give corporations undue influence over park priorities and could have lasting damage on the integrity of the National Park Service.

In reference to the beauty of America's national parks, Theodore Roosevelt said, "our people should see to it that they are preserved for their children and their children's children forever, with their majestic beauty all unmarred."⁴

We strongly urge the National Park Service to revise the draft of DO21 to ensure that future generations experience America's national parks as Theodore Roosevelt envisioned: unimpaired natural and cultural resources untouched by commercialism.

Please direct any response to Kristen Strader at kstrader@citizen.org and David Monahan at david@commercialfreechildhood.org.

Sincerely,



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¹ Aderson, P., Brujin, A., Angus, K., Gordon, R., Hastings, G. (2009). Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies". *Alcohol and Alcoholism*, 44. <http://alcalc.oxfordjournals.org/content/44/3/229>, Siegal, M., Ross, C., Albers, A., DeJong, W., King, C., Naimi, T., Jernigan, D. (2015). The relationship between exposure to brand-specific alcohol advertising and brand-specific consumption among underage drinkers – United States, 2011-2012. *The American Journal of Drug and Alcohol Abuse.*, Aderson, P., Brujin, A., Angus, K., Gordon, R., Hastings, G. (2009). Impact of Alcohol Advertising and Media Exposure on Adolescent Alcohol Use: A Systematic Review of Longitudinal Studies". *Alcohol and Alcoholism*, 44. <http://alcalc.oxfordjournals.org/content/44/3/229>

² United States Department of the Interior (2008). Director's Order #21: Donations and Fundraising. <https://www.nps.gov/policy/Dorders/DO21-reissue.pdf>

³ United States Department of the Interior (2008). Director's Order #21: Donations and Fundraising. <https://www.nps.gov/policy/Dorders/DO21-reissue.pdf>

⁴ National Park Service.

Theodore Roosevelt Quotes. <https://www.nps.gov/thro/learn/historyculture/theodore-roosevelt-quotes.htm>