



## American Recreation Coalition

*Dedicated to the protection and enhancement of everyone's right  
to health and happiness through recreation.*

November 28, 2005

Director (Submit to: [partnerships@nps.gov](mailto:partnerships@nps.gov))  
National Park Service  
U.S. Department of the Interior  
1847 C Street, NW  
Washington, DC 20240

RE: ***Director's Order #21: Donations and Fundraising***

Dear Director:

The American Recreation Coalition represents a large number of organizations with a high level of interest in the national park system and an established pattern of efforts to support the protection and enhancement of these very special parts of the American legacy. We are delighted to offer our general support for the proposed amendments to Director's Order 21 and especially agree with a statement contained within the proposed revision:

*There is no "one size fits all" approach to working effectively with NPS partners.  
This Order prescribes different levels of authority and approval depending on the  
scope of the activity.*

We believe that ***donations and fundraising reflect both an opportunity and a need to leverage resources available through appropriations.*** Appropriate management of donations and fundraising is common for causes and organizations which generate special public interest and passion – from higher education to the arts to healthcare institutions – and lessons learned from other entities can assist the National Park Service in this arena. ***We find especially useful the guidelines established by PBS and NPR regarding acknowledgment of corporate support.*** In general, this acknowledgment ***allows recognition of corporations, including logos and mission statements, but limits specific product promotion.*** A parallel provision should be considered in the final adoption of Director's Order 21 amendments.

We believe that the essential question to be answered by the responsible NPS officials at any level regarding acceptance of an offer of assistance is ***whether the overall public interest, and especially visitor experiences and resource protection, will be served better under the agreement.*** If the answer is affirmative, we believe that

the official should strive for implementation of an agreement. Specifically, we believe that **NPS officials should respond to proposals for donations and fundraising in a positive manner, either accepting a proposal or offering a counter-proposal** to redirect the offered support in ways that better fulfill NPS objectives. To aid in this effort, we encourage the **creation of a donation facilitator role** for the Associate Director for Partnerships, Interpretation/Education, Volunteers, Outdoor Recreation, providing support to superintendents and others in devising appropriate initiatives.

Our primary concerns with the proposal as proposed and distributed are as follows:

1) The amended Director's Order **focuses exclusively on dedicated national and regional "friends" organizations** and **leaves uncertain the role of many key recreation community interests** that support NPS and individual parks through such efforts as:

- Take Pride in America;
- specific volunteer events and activities, such as National Trails Day and National Public Lands Day; and
- national agreements on projects such as WOW, IMBA and more that focus on one aspect of park management, such as trail design and maintenance, on a regional or national level.

We urge the NPS to incorporate positive direction to agency officials to accept offers of assistance from the recreation/tourism community, including both industry and enthusiast organizations. We specifically **do not support** a requirement that these arrangements be required to be established in cooperation with a national or local "friends" organization because of added costs and coordination burdens which would result to recreation organizations. Similarly, we feel that any agreements of these types judged to require a formal fundraising agreement should be subject to a minimum administrative burden.

An example of our concern is the ARC-arranged **volunteer efforts at Anacostia Park within the National Capital Region by employees of PricewaterhouseCoopers** in the Washington area under the Take Pride in America banner. Begun in 2004, the program expanded in 2005 to an estimated 500 participants and will expand further in 2006 to multiple sites across the nation. In addition to the volunteer labor, PwC and ARC purchased tools and other materials retained by the NPS. We seek to **minimize any processes required to conduct such clearly beneficial activities, and especially those involving corporate volunteers on a recurring basis.**

2) We do not feel that the current draft provides sufficient guidance and latitude for a park/parks involved in **cooperative efforts involving other federal land agencies and partners – including long distance trails, byways, river corridors** and more. In some instances, NPS units will be involved but will not be the central players in arranging cooperative agreements. Examples include long distance trails (such as the Pacific Crest Trail) or a national scenic byway. Acknowledgment of support should be

consistent throughout the scope of the agreement – including at involved NPS sites – wherever possible, yet this may not be consistent with DO 21 provisions. Authorization for such exceptions should be provided.

3) We urge a clear ***exemption from DO 21 of contributions that are part of approved challenge cost-share efforts and matching contributions for grants for projects such as scenic byways, National Recreational Trails Program projects*** and other federal and state programs.

4) We suggest that specific reference be made to the ***utilization of new technologies – especially electronic information dissemination – and appropriate recognition of support*** which harnesses these technologies to benefit parks and park visitors. Specifically, recognition of contributions and other support should be permitted in consonance with the provisions for physical structures, including allowable recognition on media (DVDs, CDs, etc.) and via audible/visible content of the information channels. This is a developing area and one with substantial opportunities, and we suggest a task force be established to review policies of NPR, PBS and other organizations, as well as to solicit suggestions of NPS officials and supporters and recommend guidelines to the Director to supplement the DO 21 provisions.

5) we are in ***general support of category exclusivity accorded to participants in the Proud Partners program of the National Park Foundation*** but would urge NPS to allow exceptions to this program for good cause. There may be certain companies that feel an nexus to a specific NPS unit, or who play a major regional but not national role, and should be allowed to supplement the support afforded to the NPS system under the national agreement through park-specific donations. We feel that ***exceptions should be negotiated individually through the Associate Director for Partnerships, Interpretation/Education, Volunteers, Outdoor Recreation***. We especially support agreements for park units unable to collect entrance and other fees or where special needs exist, including those resulting from fires, storms and other special events.

We thank you for the opportunity to comment on *Director's Order #21: Donations and Fundraising*. We ask that our concerns and suggestions be responded to at or before issuance of the final order and offer to meet with NPS to discuss our suggestions.

Sincerely,

*Derrick*

Derrick A. Crandall  
President