IEc

ECONOMIC ANALYSIS OF THE PROPOSED RULEMAKING TO AMEND THE CONCESSION CONTRACT REGULATIONS FOR THE NATIONAL PARK SERVICE

FINAL | July 25, 2014

prepared for:

National Park Service

Commercial Services Program

prepared by:

Industrial Economics, Incorporated

2067 Massachusetts Avenue

Cambridge, MA 02140

617/354-0074

INDUSTRIAL ECONOMICS, INCORPORATED

TABLE OF CONTENTS

SUMMARY OF ANALYSIS

PURPOSE OF ANALYSIS

On April 17, 2000, the National Park Service (the "Service") promulgated regulations at 36 CFR Part 51 regarding the solicitation, evaluation and award of concession contracts (65 FR 20668). The Service is currently proposing two regulatory changes to its concession contracts regulations in order to improve program implementation. As part of the rulemaking process, this report presents a cost-benefit analysis consistent with Executive Order (E.O.) 12866, "Regulatory Planning and Review." It also presents an analysis of the potential impacts on small entities, as required by the Regulatory Flexibility Act (RFA), as amended by the 1996 Small Business Regulatory Enforcement Fairness Act (SBREFA) (5 U.S.C. 601 et seq.). Below we present a summary of the findings of each analysis.

COST-BENEFIT ANALYSIS

This analysis anticipates net benefits from the proposed changes to the concession contract regulations at 36 FR Part 51. As such, the analysis concludes that the Proposed Rulemaking will not generate costs exceeding $100 million in a single year. This regulatory action is anticipated to improve economic efficiency. The primary impacts of the Proposed Rule includes:

- The proposal to clarify 36 FR § 51.11 to allow the amendment or extension of a prospectus on the closing date of the solicitation period is not expected to generate incremental costs, as it is an administrative change that affects the timing of solicitation extensions. The rule change is likely to result in administrative cost savings by avoiding reissuance of prospectuses and unnecessary extensions of solicitation periods. To the extent that the overall time needed to issue new contracts is reduced, the likelihood of a lapse in visitor services will also be reduced. The specific instances in which these savings could occur are unknown, but the number of instances is expected to range from four to 24 instances each year.
- The proposal to amend 36 FR § 51.24(a) to provide the Service with greater flexibility in issuing temporary contracts is expected to generate net benefits, as it will allow the Service to avoid an interruption in visitor services for concession services where a prospectus was issued but the Service does not receive any bids from the concessioner community. As such, the potential for the award of a temporary contract is not expected to result in adverse impacts on competition or access to the concessions market within the National Park System. The rule change should result in reduced likelihood of lost visitor services. The specific instances in which these improvements could occur are unknown, but the number of instances is expected to occur no more than once per year.

SMALL ENTITY IMPACT ANALYSIS

In accordance with the RFA/SBREFA, this analysis finds that the Proposed Rulemaking to amend certain provisions within the concession contract regulations will not have a significant impact on a substantial number of small entities (SISNOSE). Appendix A presents a threshold analysis conducted for the Proposed Rule in support of this determination.

SECTION 1. INTRODUCTION

The U.S. Department of Interior's National Park Service (the "Service" hereafter), manages approximately 401 areas across more than 84 million acres that make up the National Park System within the United States (U.S.).[1] To enhance the experience of park visitors, the Service has relied on private firms to provide visitors services within the National Park System since before the establishment of the Service in 1916.

The Service's Commercial Services Program (CSP) is responsible for managing and overseeing commercial visitor services across the National Park System. The mission of the CSP is to ensure that concession contracts are "limited to those that are necessary and appropriate for public use and enjoyment" of the National Park area where they are located and that concession operations are "consistent to the highest practicable degree with the preservation and conservation of [these] areas."[2] The Service currently administers approximately 500 contracts for visitor services (i.e., concession contracts) across approximately 150 park units. Concession contracts are used to provide a variety of commercial services including lodging, restaurants, transportation, ferry services, retail, backcountry guides, and other services. Concession contracts represent a significant contribution to the economy, generating gross annual revenues of approximately $1.1 billion and 25,000 jobs.[3]

Historically, concession contracts and operations were governed by the 1965 Concession Policy Act.[4] This law mandated numerous policies and procedures regarding concessions operations. In 1998, with the objective of improving concessions and increasing competition of contracts, Congress enacted the 1998 Concessions Management Improvement Act ("1998 Act").[5] Some of the changes incorporated into the 1998 Act include reduced preferential right situations, franchise fee distribution changes, new competitive bid requirements, and increased accountability and oversight.

Except for certain very limited exceptions, the Service must solicit competitive proposals by issuing a prospectus for each concession contract.[6] In these circumstances, the Service may award a temporary concession contract without soliciting competitive proposals.

---

[1] NPS. Frequently Asked Questions. Accessed on July 10, 2014 at: http://www.nps.gov/faqs.htm.

[2] NPS. Commercial Services: Law, Regulation, and Policy. Accessed on July 10, 2014 at: http://www.concessions.nps.gov/regulations.htm.

[3] NPS. 2014. National Park Service Overview. April 21. Accessed on July 14, 2014 at http://www.nps.gov/news/upload/NPS-Overview-2014_04-21-2014.pdf.

[4] Public Law 89-249.

[5] Public Law 105-391.

[6] More detail on the solicitation process for concession contracts is provided in Section 3.1.

1.1 PURPOSE OF THIS ANALYSIS

The Service is in the process of issuing a rule to revise its regulations at 36 CFR Part 51 regarding the solicitation, evaluation and award of concession contracts (65 FR 20668). This report presents a regulatory analysis of the impacts of the rule in order to assist the Service in meeting the requirements of E.O. 12866, “Regulatory Planning and Review,” which requires Federal agencies to assess the potential costs and benefits of proposed regulatory actions. It also addresses the requirements of the RFA/SBREFA, which requires Federal agencies to consider the potential impacts of any regulatory actions on small entities.

1.2 STRUCTURE OF THE REPORT

This report is organized as follows:

- Section 1 introduces the current regulations and the Service’s proposed regulatory changes.
- Section 2 discusses the framework for the cost-benefit analysis.
- Section 3 describes the baseline conditions from which all costs and benefits are assessed thereafter.
- Sections 4 and 5 present the cost-benefit analysis of the two regulatory changes proposed by the Service to its concession services program.
- Appendix A presents an analysis of the potential costs of the Proposed Rule on small entities.

1.3 STATEMENT OF NEED FOR THE PROPOSED ACTIONS

E.O. 12866 indicates that Federal agencies should only promulgate regulations that address a compelling public need, such as material failures of private markets to protect or improve the health and safety of the public, the environment, or the well-being of the American people. In this case, the Service has already promulgated regulations, which they intend to revise. The Service considers these regulatory changes necessary to improve the process by which the Service awards and administers contracts for concession services within the National Park System, and to facilitate more effective resource management. Specifically, the Service is proposing changes to its concession contract regulations in order to be to improve its ability to solicit, award and administer concession services Service-wide. In particular, the Proposed Rule aims to avoid any disruption of concession services that could occur.

1.4 CURRENT REGULATIONS AND PROPOSED REGULATORY CHANGES

The Service is proposing two changes to its regulations at 36 CFR Part 51. Specifically, the Proposed Rule would clarify ambiguities regarding when the Service may amend or extend the solicitation period for a prospectus as well as provide the Service greater flexibility to award a temporary contract in order to ensure the continuation of visitor services. Below we describe each proposed regulatory change in more detail.

Clarifiying Prospectus Extensions (36 FR § 51.11)

Regulations at 36 FR § 51.11 describe the circumstances under which the Service may extend the solicitation period for a prospectus. Specifically, 36 FR § 51.11 states:

> "The Director may amend a prospectus and/or extend the submission date **prior to** the proposal due date." [emphasis added]

As written, the regulation could be interpreted to only allow the agency to extend a prospectus up to the day before the solicitation period expires. The Proposed Rule would clarify that the Service may amend a prospectus or extend the submission date up to and including the day the solicitation expires. Specifically, the Proposed Rule will delete the word "prior" and add the phrase "at any time up to and including" with respect to the amendment or extension of the solicitation. Thus, the proposed regulation would modify the language at 36 FR § 51.11 to clearly authorize the Service to amend or extend a prospectus up to and including the day the solicitation period expires.

Flexibility in Awarding Temporary Contracts (36 FR § 51.24(a))

The Service's concession regulations are designed to strike a balance between promoting competition among concessionaires and ensuring that park visitors have continuous access to commercial services. In order to avoid an interruption of services to the public, the 1998 Act authorizes the Service to extend a concession contract or award a temporary concession contract for a term not to exceed three years.[7]

The existing regulations at 36 FR § 51.24(a), however, do not allow the Service to award a temporary concession contract for visitor services provided under an already extended concession contract.[8,9] According to the Service, this restriction was the result of a policy decision rather than a requirement under the 1998 Act.[10]

The Proposed Rule would delete the last sentence in 36 FR § 51.24(a), thereby providing the Service with greater flexibility that may be needed to ensure the continuation of visitor services in a manner consistent with the 1998 Act. According to the Service, greater flexibility to award a temporary contract may be necessary when the Service faces unforeseen and/or unusual situations with respect to a specific concession contract.

---

[7] 16 U.S.C. § 5952(11).

[8] 36 C.F.R. 51.24.

[9] This restriction does not apply to visitor services conducted under a concession contract that was in effect as of November 13, 1998, and that either had been extended as of that date or was due to expire by December 31, 1998, and was subsequently extended (36 FR § 51.24(b)).

[10] According to CSP staff, the policy decision to impose this limitation was intended to incentivize the timely issuance of contracts. (Personal communication, National Park Service, Commercial Services Program, June 13, 2014.)

1.5 REGULATORY ALTERNATIVES

The Service evaluated the alternative to revise the regulations as described in the Proposed Rule, and a No Action alternative under which the proposed regulatory changes are not be pursued at this time.

SECTION 2. FRAMEWORK FOR COST-BENEFIT ANALYSIS

At the guidance of the Office of Management and Budget (OMB) and in compliance with E.O. 12866, Federal agencies measure changes in economic efficiency in order to understand how society, as a whole, will be affected by a regulatory action. In the context of the proposed regulatory actions, these efficiency effects represent the opportunity cost of resources used or benefits foregone by society as a result of the regulations. OMB defines opportunity cost as "the preferred measure of cost of the resources used, or the benefits foregone, as a result of the regulatory action."[11]

Economists generally characterize opportunity costs in terms of changes in producer and consumer surpluses (i.e., social welfare impacts) in affected markets.[12] The objective of cost-benefit analysis (CBA) is to identify the proposed alternative action that will maximize net benefits (the difference between the projected benefits and the costs). In other words, the analysis considers the costs imposed on society (losses in social welfare) as compared to the benefits to society (gains in social welfare).

To compare costs and benefits for a proposed action, cost and benefits will ideally be presented in monetary (i.e., dollar) units. However, E.O. 12866 recognizes that in some cases it may be infeasible to monetize all the potential costs and benefits associated with a proposed regulatory change. In such cases, OMB Circular A-4 allows Federal agencies to present relevant quantitative information about costs and benefits in physical units or to present information qualitatively.

This analysis also considers the potential distributional impacts of the rule, i.e., whether the proposed action may unduly burden a particular group or economic sector. For example, while the proposed actions may have a small cost relative to the national economy, individuals employed in a particular sector of the economy may experience relatively greater costs.

2.1. EFFECTS OF THIS RULEMAKING

Park concessioners provide a wide array of services to park visitors, ranging from food and lodging to white water rafting and backpacking adventures. Visitor spending on these goods and services generates revenues and may increase producer surplus (i.e., revenues net of variable costs) for the concessioners. The concessioners

---

[11] U.S. Office of Management and Budget, "Circular A-4," September 17, 2003, available at http://www.whitehouse.gov/omb/circulars/a004/a-4.pdf.

[12] For additional information on the definition of "surplus" and an explanation of consumer and producer surplus in the context of regulatory analysis, see: Gramlich, Edward M., A Guide to Benefit-Cost Analysis (2nd Ed.), Prospect Heights, Illinois: Waveland Press, Inc., 1990; and U.S. Environmental Protection Agency, Guidelines for Preparing Economic Analyses, EPA 240-R-00-003, September 2000, available at http://yosemite.epa.gov/ee/epa/eed.nsf/webpages/Guidelines.html.

in turn provide employment opportunities through their own operations, as well as income and employment to connected economic sectors that provide inputs to their operations. In addition to increasing the provision of goods and services to visitors in the park, the opportunities provided by concessioners may increase the utility that visitors derive from their visit to the park (i.e., "consumer surplus"). Consumer surplus refers to an individual's willingness to pay for a good or service net of any costs associated with consuming those services. To the extent that the Proposed Rule will increase opportunities provided by concessioners or avoid lapses in services, the rule should increase consumer surplus for visitors.

The Service itself may experience efficiencies due to the Proposed Rule. As stated above, the Service anticipates that the rule changes should reduce unnecessary paperwork, process, and time in issuing new contracts. To the extent that the Proposed Rule results in fewer delays or avoids any lapses in concession services, there are likely to be associated social welfare benefits (increased producer and consumer surpluses). Should the Proposed Rule result in additional delays or lapses, the reverse would be true.

To the extent that the Proposed Rule decreases the variable costs of concession operations, including paperwork costs, producer surpluses would increase. To the extent that concessioners pass on those cost savings to consumers, prices of concessions would decrease, resulting in a transfer of surplus gains to the consumers of those goods and services (visitors). To the extent that the availability of concession services is increased as a result of the Proposed Rule, additional gains in consumer surplus (in the form of increased park enjoyment) could also result.

The analysis that follows describes the baseline for the analysis, then identifies, describes, and where possible, measures the changes in social welfare associated with the Proposed Rule as compared to the No Action Alternative.

SECTION 3. DESCRIPTION OF BASELINE CONDITIONS

This section describes the baseline conditions for the CSP. OMB defines the baseline as the "best assessment of the way the world would look absent the proposed action."[13] In other words, the baseline includes the existing regulatory and socio-economic burden already imposed on entities that may be affected by the proposed action. In this case, these entities are the Service, concessioners, and the users of concessioner services (park visitors).

Of the approximately 401 areas that the Service manages, approximately 32 percent provide commercial services through concession contracts.[14] In 2012, the most recent year for which data are available, CSP managed 494 active concession contracts

---

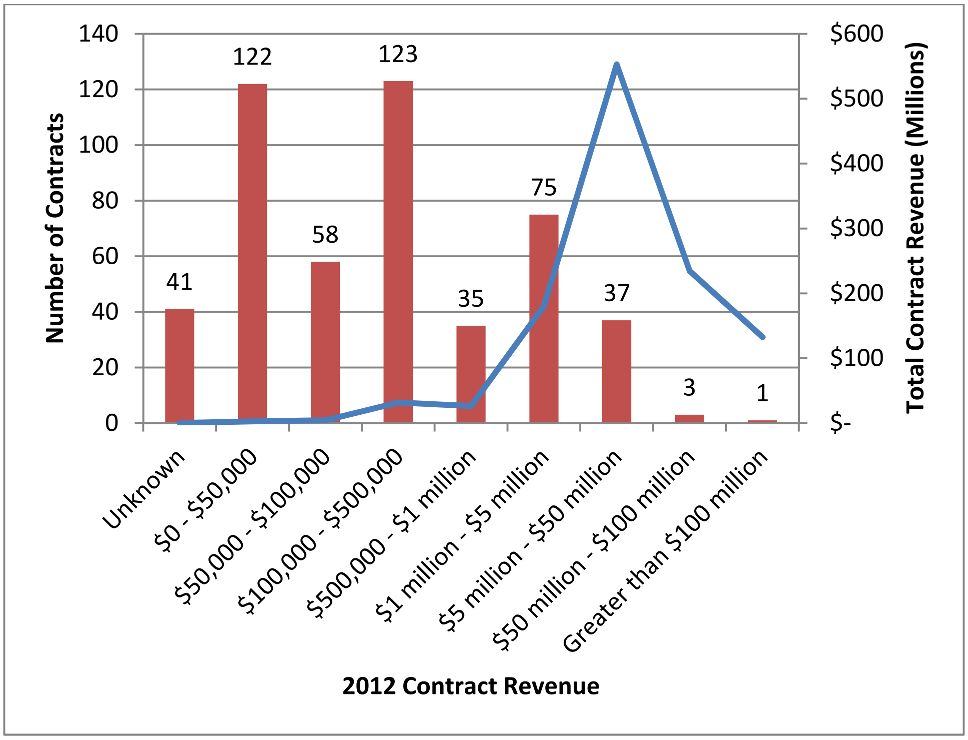
[13] U.S. Office of Management and Budget, "Circular A-4," September 17, 2003, accessed at http://www.whitehouse.gov/omb/circulars/a004/a-4.pdf.

[14] U.S. Department of the Interior, National Park Service. 2012 Annual Report. Commercial Services Program. Washington, D.C., p. 5.

across approximately 150 parks, generating gross annual receipts of approximately $1.1 billion.

Revenue per concession contract varied widely. Exhibit 3-1 illustrates the distribution of concession contracts in 2012 by contract revenue. As shown, contracts with annual gross revenue of $500,000 or less account for the majority (69 percent) of all concession contracts. Total revenue from these contracts, however, accounts for only 3.5 percent of the total gross revenue from all contracts. By contrast, while contracts with gross revenue of $5 million or greater comprise only 8.2 percent of all concession contracts, these contracts account for 79 percent of all contract revenue.

EXHIBIT 3-1. CONCESSION CONTRACT DISTRIBUTION BY GROSS REVENUE (2012)



Source: Email communication, National Park Service, Commercial Services Program on June 16, 2014.

The Service divides the U.S. into seven regions: Alaska, Intermountain, Midwest, National Capital, Northeast, Pacific West and Southeast. While the Intermountain and Alaska regions have the highest number of concession contracts, gross concessioner revenue is highest in the Intermountain and Pacific West Regions due to the popularity and extensive network of concession operations in parks such as Yellowstone, Yosemite, Golden Gate, Grand Canyon, and Glen Canyon.

Exhibit 3-2 presents the ranges of revenues generated by all contracts in 2012, which ranges from $283 to $133 million, with a mean value of approximately $2.5 million and a median value of $166,278.

EXHIBIT 3-2. DISTRIBUTION OF CONCESSION CONTRACT REVENUES (2012)

SUMMARY STATISTIC	2012 CONTRACT REVENUE	CONTRACT DESCRIPTION
Minimum	$283	Vending machine sale of soft drinks and snacks at Sagamore Hill National Historic Site Visitor Center
Maximum	$132,675,160	Provision of overnight accommodations, food and beverage, retail service, fuel and auto services, and other related services in Yosemite National Park
Median	$166,278	Mountaineering operations in Rocky Mountain National Park.

Source: Email communication, National Park Service, Commercial Services Program on June 16, 2014.

Concession operators also represent a source of revenue for individual parks. Concession operators pay franchise fees to the Service. In 2012, franchise fees totaled approximately $74.0 million, of which 80 percent remained in the parks from which the revenues were generated and 20 percent were used for system-wide management and support activities.[15] As shown in Exhibit 3-3, total gross receipts and franchise fees have remained relatively stable between 2008 and 2012.

EXHIBIT 3-3. ANNUAL GROSS RECEIPTS AND FRANCHISE FEES (2008-2012)

YEAR	ANNUAL GROSS RECEIPTS ($ MILLIONS)	FRANCHISE FEES ($ MILLIONS)
2008	$1,036	$54.7
2009	$1,016	$58.9
2010	$1,121	$65.6
2011	$1,126	$68.2
2012	$1,169	$74.0
Five-Year Average	**$1,094**	**$64.3**

Source: U.S. Department of the Interior, National Park Service. 2012 Annual Report. Commercial Services Program. Washington, D.C., p. 5.

3.1. SOLICITATION PROCESS FOR CONCESSION CONTRACTS

According to Service data, concession contracts are typically awarded for a period of ten years or less (83 percent of contracts), but can also be as short as one year or extend as long as 20 years.[16] Before awarding a concession contract, the Service solicits offers from private firms via a "prospectus." The prospectus is a public notice issued by the Service regarding an opportunity for a concession contract. The prospectus provides important information to assist potentially interested parties (i.e., bidders) to develop responsive offers. Prospectuses describe contract terms and conditions, park operations, resource protection, financial data, and relevant

---

[15] NPS. Commercial Services. Accessed on April 30, 2014 at: http://www.nps.gov/training/essentials/html/commercial_services_topic.html.

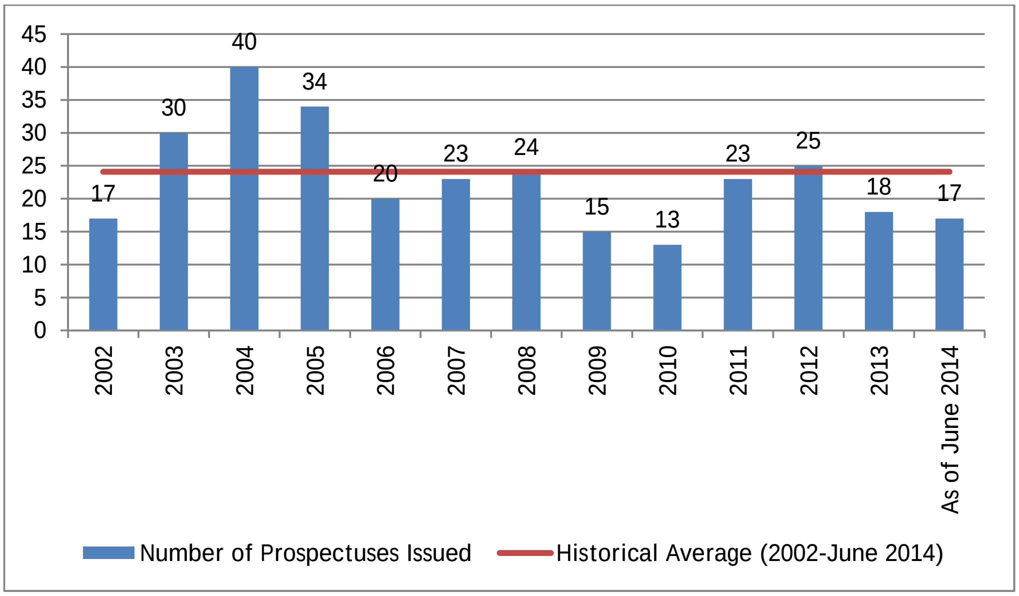
[16] Email communication, National Park Service, Commercial Services Program on June 16, 2014.

investment requirements. The Service uses private-sector business consultants to aid in the development of prospectuses for concession contracts.[17]

Exhibit 3-4 provides a historical summary of the number of prospectuses issued each year for concession contracts between 2002 and 2013, reflecting an average issuance rate of 24 prospectuses per year. In 2014, CSP plans to issue a total of 36 prospectuses, of which they have issued 17 prospectuses as of June 2014.[18]

The total number of concession contracts has remained relatively stable between 2002 and 2014. CSP does not anticipate any significant changes that would otherwise materially alter the total number of contracts or the total revenues generated by concession contracts moving forward.[19]

EXHIBIT 3-4. NUMBER OF PROSPECTUSES ISSUED (2002-JUNE 2014)



Source: Email communication, National Park Service, Commercial Services Program on June 16, 2014.

The length of the solicitation period varies significantly depending on the concession contract, ranging from a minimum of 45 days to as long as one year.[20] Offers in response to a prospectus are typically submitted by concessioners on the day that the solicitation expires. In so doing, concessioners maximize the time allowed to craft a bid responsive to the prospectus and the concession services requested therein.

---

[17] Statement of Peggy O'Dell, Deputy Director, National Park Service, Department of the Interior on August 2, 2012, before the Subcommittee on National Parks, Forest and Public Lands of the House Committee on Natural Resources, Concerning Concession Contract Issues for Outfitters, Guides and Smaller Businesses. Accessed on July 11, 2014 at: http://www.doi.gov/ocl/hearings/112/Special-Use-Permits-08-02-12.cfm?renderforprint=1&.

[18] Personal communication National Park Service, Commercial Services Program on June 13, 2014.

[19] *Ibid*.

[20] The length of the solicitation period depends on the size of the contract as well as the season (i.e., so as not to distract concessioners from visitor services within Parks, solicitation periods are typically set with a due date outside of the busy season for the affected concession service). (Personal communication National Park Service, Commercial Services Program on June 13, 2014.)

At the close of the solicitation period, the Service reviews bids submitted based on five principal selection factors and one secondary selection factor for certain operations.[21] Reviews are typically conducted by a panel of individuals with special knowledge of the service and/or Park for which services are requested in the prospectus. Depending on the number of offers, panels vary in size between six to 15 people, during which panel members commit 100 percent of their time to bid evaluation for up to two weeks. [22]

Extensions

Under 36 FR § 51.11, the Service may amend or extend a prospectus prior to the end of the solicitation period. Between 2002 and June 2014, the Service issued a total of 299 prospectuses, for which CSP extended the solicitation date for 12 prospectuses.[23, 24] This level of activity translates to less than one percent of all prospectuses issued, or the extension of approximately one prospectus per year. CSP granted the highest number of extensions in 2011, extending a total of seven prospectuses.[25] Based on historical rates, we would expect future extensions to average approximately four per year.[26] Depending on the particular prospectus, extensions may be issued between one week and one month. Longer extensions are issued in cases where the extension is accompanied by a modification to the prospectus.[27]

Extensions of an existing prospectus may occur for a number of reasons. Common circumstances include, but are not necessarily limited to:

- A lack of interest among potential bidders;[28]
- Weather-related delays that may prevent timely bid delivery;[29]
- A large number of questions are submitted, which requires additional time for CSP staff to review and respond; or
- The solicitation period expires on a holiday.

Particularly relevant to this Proposed Rule are extensions which result from a lack of interest among potential bidders. As previously discussed, under the baseline, the

---

[21] For more information on the selection process, see: NPS. Prospectuses. Accessed on April 30, 2014 at: www.concessions.nps.gov/prospectuses.htm.

[22] Personal communication National Park Service, Commercial Services Program on June 13, 2014.

[23] Of the 12 extensions, two prospectuses were extended twice.

[24] Email communication, National Park Service, Commercial Services Program on June 16, 2014.

[25] Data are not readily available on the cause of past extensions of a prospectus solicitation period.

[26] Personal communication National Park Service, Commercial Services Program on June 13, 2014.

[27] Email communication National Park Service, Commercial Services Program on July 21, 2014.

[28] Personal communication National Park Service, Commercial Services Program on June 13, 2014.

[29] Some concession operators hand-deliver their proposals to the Service, which can result in concessioners driving several hundred miles to a Service office. In the past, extensions have been granted for weather-related delays (e.g., closed roads). (Personal communication National Park Service, Commercial Services Program on June 13, 2014.)

current regulation could be interpreted to only allow the Service to extend a prospectus up to the day before the solicitation period expires. Thus, CSP may find, in some cases, that there are no bidders for a prospectus when the solicitation period closes. In such cases, the Service may have to reissue the prospectus, losing significant time prior to the new contract award. The additional time needed to reissue a prospectus has the potential to result in a previous contract expiring before a new one can be issued in its place, resulting in a need for a temporary contract or, failing that, loss of visitor services.

Alternatively, under the baseline, the Service can, in an attempt to avoid a "no bid" situation at the time of the closing of the solicitation period, grant prospectus extensions early. This has the potential to result in "unnecessary extensions" in cases where bidders already intended to bid on a prospectus, and thus an extension was not needed.

Temporary Contracts

Under 36 FR § 51.24, the Service is authorized to non-competitively award temporary contacts. Temporary contacts are used as a management tool by the Service in cases where no feasible alternative exists that will avoid a disruption of services. Temporary contacts typically are developed through negotiations with a concessioner and, as a result, NPS may agree to lower franchise fees and other suboptimal terms and conditions in an effort to avoid service disruptions. As such, while temporary contracts offer a degree of flexibility for special circumstances, the Service prefers to award standard contracts whenever possible.[30] In 2012, of the 34 contracts awarded, four (or 11.8 percent) were temporary contacts. Exhibit 3-5 presents a historical summary of the number of temporary contacts awarded each year between 2007 and June 2014.

EXHIBIT 3-5. NUMBER OF TEMPORARY CONTRACTS AWARDED (2002-JUNE 2014)

YEAR	TEMPORARY CONTRACTS
2007	2
2008	3
2009	5
2010	1
2011	5
2012	4
2013	6
As of June 2014	1
Annual Average	3.4
Total	**27**

Source: Email communication National Park Service, Commercial Services Program on July 15, 2014.

[30] Personal communication National Park Service, Commercial Services Program on June 13, 2014.

While the Service has been able to successfully award new contracts within the existing regulations for concession contracts at 36 FR § 51.24(a), the Service is concerned that three years may be too restrictive for a limited set of future contracts to avoid a loss of visitor services.

Temporary contracts for visitor services conducted under an already-extended contract may be necessary in cases when a prospectus repeatedly fails to attract responsive offers.[31] That is, at the end of the solicitation period, the Service received no bids responsive to the prospectus and the concession contract contained therein. In the experience of CSP staff, such situations occur infrequently, but can result from concession contracts with terms and conditions considered unattractive by the concessioner community, for example, contracts in remote locations or contracts which require a large up-front capital investment.

In such cases, the Service must re-evaluate the terms and conditions proposed in the prospectus and consider what changes can be made to increase interest among potential bidders. However, revising and issuing a prospectus often takes significant time and resources and, depending on the term of the existing concession contract, sufficient time may not be available to prepare and issue a new prospectus before the existing concession contract expires. In the baseline, this type of circumstance could lead to a disruption of visitor services if the concession contract has already been extended once.

SECTION 4. COST-BENEFIT ANALYSIS OF THE PROPOSED CLARIFICATION OF PROSPECTUS EXTENSIONS AT 36 FR § 51.11

This section discusses the potential costs and benefits resulting from the Proposed Rule to clarify the date on which the Service may amend or extend a prospectus.

The Proposed Rule would allow CSP's preferred practice, which is to decide whether to grant a prospectus extension on the day the solicitation period expires. In this manner, CSP can have the most certainty about whether bids are likely to be received, or whether other extenuating circumstances exist (such as extreme weather conditions that may delay delivery) before deciding to extend the solicitation period.

4.1 COSTS AND BENEFITS OF REDUCED "NO BID" SOLICITATIONS

The number of cases where the CSP would encounter "no bid" situations after the solicitation period closes should be reduced under the Proposed Rule. In these cases, solicitation extensions would likely be issued in place of solicitation reissuances. Data on the typical number of "no bid" prospectuses were not available at the time of this analysis; however, it would be expected to be substantially less than 24, which is the average number of annual prospectuses issued since 2002 (Exhibit 3-4). However, because the effort, and hence, costs, of issuing extensions is less than the effort (costs) of reissuing prospectuses, net cost savings are anticipated as a result of this

[31] Personal communication National Park Service, Commercial Services Program on June 13, 2014.

change. In addition to these savings, new contracts will be able to be issued more quickly, reducing the likelihood of lost services to visitors.

4.2 COSTS AND BENEFITS OF REDUCED "UNNECESSARY EXTENSIONS"

The Proposed Rule should also reduce the number of cases where CSP extends a closing date for a prospectus prior to the last day of the solicitation period because of concerns about lack of interest when, in fact, bids are being prepared. The savings in these cases would be related to reducing the costs associated with issuing extensions and reorganizing evaluation panels. In addition to these savings, new contracts will be able to be issued more quickly, reducing the likelihood of lost services to visitors.

Evaluation panels are usually timed closely following the date the solicitation period expires for a particular prospectus, or multiple, similar prospectuses. Significant effort is expended to organize panels, and is often coordinated well in advance of the solicitation expiration date. Organization of a panel typically requires approximately 40 hours of senior staff time to reach out to possible panel members and coordinate travel schedules and logistics. Panel reorganization may require similar or greater level of effort to the initial panel, depending on the panel size.[32] At current salary rates for a senior manager, 40 hours is equal to costs of approximately $1,200 to $2,100, assuming rates for a salary grade between GS-12 to GS-14.[33] Thus, for each avoided extension, the Service may save approximately $2,000. While the number of typical unnecessary extensions is not known, it must be less than the number of total extensions granted per year (approximately four per year). This would result in an average annual savings of approximately $8,000 per year for panel reorganization, in addition to the savings related to the unnecessary extensions.

4.3 SUMMARY

The proposal to clarify 36 FR § 51.11 to allow the amendment or extension of a prospectus on the closing date of the solicitation period is expected to generate overall net benefits by avoiding administrative costs associated with reissuing prospectuses or issuing unnecessary extensions of solicitation periods. To the extent that the overall time needed to issue new contracts is reduced, the likelihood of a lapse in visitor services will also be reduced.

SECTION 5. COST-BENEFIT ANALYSIS OF THE GREATER FLEXIBILITY PROPOSED FOR AWARDING TEMPORARY CONTRACTS AT 36 FR § 51.24(a)

The regulations at 36 FR § 51.24(a) describe the circumstances under which the Service may non-competitively award a temporary concession contract. Temporary contracts can be useful in cases where a new standard contract cannot be issued in time to avoid loss of services. As discussed in Section 2, the Proposed Rule would

---

[32] Personal communication National Park Service, Commercial Services Program on June 13, 2014.

[33] Office of Personnel Management. 2014. Salary Table GS Incorporating the 1% General Schedule Increase. January.

allow the Service to issue temporary contracts for visitor services provided under an extended contract within a three-year limit in order to avoid a disruption of services.[34]

Below we discuss the potential costs and benefits that may result from providing the Service greater flexibility to award temporary contacts.

5.1 COSTS OF AWARDING TEMPORARY CONTRACTS

In general, potential impacts associated with awarding temporary contacts would be a delay in opportunities for new businesses to compete for concession services within the National Park System. To understand how the proposed regulatory change may affect competition, this analysis is guided by two considerations:

(1) Will the Proposed Rule directly or indirectly limit the number or range of potential vendors?

(2) Will the Proposed Rule limit the ability or incentives of concessioners to compete for a specific concession contract?

In considering the cost of this regulatory change, it is unlikely that the Proposed Rule will result in an adverse impact on competition or access to the concessions market because the regulatory change is designed to address rare occasions, such as when a particular prospectus issued by the Service suffers from a persistent lack of interest among the concessioner community, and may also be applicable in other unanticipated or unusual circumstances that cannot be predicted at this time.[35,36] In other words, the absence of any bids is a signal to the Service that the prospectus may not offer a reasonable opportunity for profit considering the typical rate of the return within the concessioner industry. Therefore, in order to stimulate interest (and competition), the Service must re-assesses the concession contract and consider changes to the terms and conditions to increase the likely rate of return to a potential bidder.

5.2 CONSUMER SURPLUS BENEFITS OF AWARDING TEMPORARY CONTRACTS

The primary intended benefit of the proposed regulatory change is to ensure park visitors have continual access to visitor services. Thus, attempts to develop monetary estimates of the primary benefits of this proposed action would focus on the willingness to pay by park visitors to avoid a disruption in visitor services. As previously discussed, the welfare that a park visitor derives from concession services is measured in terms of consumer surplus, which refers to the sum of an individual's maximum willingness to pay for services, net of any costs associated with consuming those services. If a particular concession operation at a given Park becomes

---

[34] *Ibid*. 7.

[35] For example, in one past situation, a concessioner who was a sole practitioner unfortunately passed away while holding an extended contract. (Personal communications with National Park Service, Commercial Services Program on June 19 and July 21, 2014.)

[36] Since 2001 there have been four instances in which a lack of bids resulted in the permanent closure and/or long-term suspension of concession services. (Email communication, National Park Service, Commercial Services Program on June 19, 2014.)

unavailable to a park visitor, the welfare loss suffered by the park visitor is his or her consumer surplus derived from the concession service, net of the surplus derived from visiting the next best alternative concession operation or undertaking the next most preferred alternate activity.

A robust economic literature exists on the willingness to pay by individuals for different recreational activities. The enjoyment and value of a particular recreational activity will differ for each individual, depending substantially on such attributes as weather and location; therefore the willingness to pay (or value) for a particular good or service offered by a concessioner will also differ across individuals depending on the good or service as well as the Park. For example a visitor's willingness to pay is likely greater for white water rafting in the Grand Canyon, as compared to white water rafting in Shenandoah National Park. The U.S. Forest Service and U.S. Department of Agriculture periodically issue a report that provides a summary of the willingness to pay per day for 30 recreational activities on public national forest lands, broken down by U.S. census region. The most recent report was released in October 2005. The willingness to pay values available in this report are often used for CBA by Federal agencies. The report presents data from 1,239 observations derived from economic studies spanning from 1967 to 2003. The most common recreational activities for which willingness to pay values are available include hunting, fishing, wildlife viewing and camping. The average estimate of consumer surplus is $56.92 per person per day (2013 dollars) across all 1,239 observations.[37]

To estimate the welfare loss associated with a disruption of a particular concession service requires an understanding of an individual visitor's preferences for different concession services within that visitor's choice of opportunities at a specific Park. Ideally such information is developed through the construction of an economic model of visitors' preferences for different experiences and then predicts how each visitor's behavior and enjoyment may change as a result of a disruption in concession services. For example, if a particular lodging establishment becomes unavailable, the visitor may decide to go to a second best lodging option, or perhaps even decide not to visit the Park at all. The welfare loss associated with each option, measured in terms of consumer surplus, will vary depending on the visitor's value of his or her first choice concession service and available alternatives. Additionally, if a visitor has access to adequate, equally desirable substitute activities in lieu of the concession services unexpectedly unavailable, the visitor's welfare may remain unchanged. In addition, the circumstances under which a disruption of services may result from a lack of proposals for a particular concession contract is rare. Since 2001, the Service has not yet faced this circumstance, and moving forward, the Service has identified only two instances in which this may occur. According to CSP staff, the type of concession contracts or services that may be affected by this type of disruption is unpredictable – independent of contract type, location, or service. As such, while the

---

[37] Willingness to pay is adjusted from 2004 to 2013 dollars using the gross domestic product (GDP) price indexes. Source: Bureau of Economic Analysis. 2014. Table 1.1.4 Price Indexes for Gross Domestic Product. Accessed on July 14, 2014 at http://www.bea.gov/iTable/iTable.cfm?ReqID=9&step=1#reqid=9&step=3&isuri=1&903=4.

Proposed Rule is likely to avoid a loss in consumer surplus, this analysis is unable to monetize or quantify the magnitude of the consumer surplus losses avoided due to the Proposed Rule. Below we provide a qualitative description of the commercial services program, including available data on visitation at parks with concession contracts.

Visitation at Parks with Concession Contracts

While the Service does not collect data on the numbers of visitors that use specific concession contracts, the Service does collect and maintain visitor data by Park. These data describe the visitation activity that concession operations support. As previously discussed, concession contracts existed at approximately 150 parks in 2012. Recreational visitation at parks with park-specific concession contracts 2013 totaled 165 million in 2013, which accounts for approximately 60 percent of total Park-wide visitation in 2013.[38,39] While not all of these visitors will consume goods and services offered by concessioners, these data provides some indication of the level of activity that Parks with concession services support. Exhibit 5-1 below presents a summary of the range of visitation at Parks with concession services. Appendix B provides a more detailed summary of the most recent data available on the number of concession contracts and recreational visits, by Park.

EXHIBIT 5-1. DISTRIBUTION OF PARK VISITATION (2013)

SUMMARY STATISTIC	2013 VISITATION	PARK NAME
Minimum	134	Aniakchak National Monument and Preserve
Maximum	14,289,121	Golden Gate National Recreation Area
Median	815,007	Fort Sumter National Monument

Source: National Park Service. 2013. Annual Park Ranking Report for Recreation Visitors in 2013. Accessed on July 14, 2014 at: https://irma.nps.gov/Stats/SSRSReports/National%20Reports/Annual%20Park%20Ranking%20Report%20%281979%20-%20Last%20Calendar%20Year%29.

5.3 OTHER BENEFITS OF AWARDING TEMPORARY CONTRACTS

In addition to consumer surplus benefits, the Proposed Rule allowing the award of more temporary contracts may produce other benefits. In particular, the Service may avoid expending staff time to address impacts of expired contracts and loss of services at affected parks. Such avoided efforts may include alerting visitors to the status of concession services that become unavailable and arranging alternate concession services in the interim.

---

[38] This number does not include non-recreation visits, that is, visitors that enter Parks through traffic (commuters), persons going to and from inholdings, trades people with business in the park, and government personnel (other than Service employees) with business in the park.

[39] This number does not include visitation to parks covered under regional office concession contracts that do not have concession contracts specific to the parks themselves.

For concessioners, as compared to the original prospectus which failed to attract responsive bids, temporary contracts may present an opportunity to negotiate concession contracts with more favorable contract terms (e.g., lower fees). To the extent that a concessioner is able to negotiate more favorable contract terms through a temporary contract, this outcome would decrease the variable costs of concession operations and increase producer surpluses. In a situation where bidders are plentiful, the rule could potentially delay or suppress competition. However, the Service does not anticipate awarding temporary contracts in situations where responsive bids have been submitted, except in rare and unusual circumstances, which the Service cannot predict at this time.

5.4 SUMMARY

The proposal to amend 36 FR § 51.24(a) to provide the Service greater flexibility to issue temporary contracts is expected to generate net benefits because it allows the Service to avoid visitor service disruptions in rare instances, such as when a prospectus does not receive any bids from the concessioner community. While the specific instances in which these improvements could occur are unknown, the Service does not anticipate such circumstances to occur more than once per year.

SECTION 6. SUMMARY AND CONCLUSION

In conclusion, the analysis anticipates net benefits from the proposed changes to the concession contract regulations at 36 FR Part 51. As such, the analysis concludes that the Proposed Rulemaking will not generate costs exceeding $100 million in a single year. This regulatory action is anticipated to improve economic efficiency. The primary impacts of the Proposed Rule are as follows:

- The proposal to clarify 36 FR § 51.11 to allow the amendment or extension of a prospectus on the closing date of the solicitation period is not expected to generate incremental costs, as it is an administrative cost change that affects the timing of solicitation extensions. The rule change is likely to result in administrative cost savings by avoiding reissuance of prospectuses and unnecessary extensions of solicitation periods. To the extent that the overall time needed to issue new contracts is reduced, the likelihood of a lapse in visitor services will also be reduced. The specific instances in which these savings could occur are unknown, but the number of instances is expected to range from four to 24 each year.

- The proposal to amend 36 FR § 51.24(a) to provide the Service greater flexibility to issue temporary contracts is expected to generate net benefits, as it will allow the Service to avoid an interruption in visitor services for concession services where a prospectus was issued but the Service did not receive any bids from the concessioner community. As such, the potential for the award of a temporary contract is not expected to result in adverse impacts on competition or access to the concession market within the National Park System. The specific instances in which these improvements could occur are unknown, but the Service does not anticipate such circumstances to occur more than once per year.

While the magnitude of likely benefits is uncertain, and quantification would require primary research and the generation of substantial amounts of new data, which is beyond the scope of this report, Exhibit 6-1 provides a summary of the costs and benefits for each of the proposed regulatory changes to the concession contract regulations.[40]

EXHIBIT 6-1. CBA SUMMARY FOR PROPOSED REVISIONS TO THE CONCESSION CONTRACT REGULATIONS

PROPOSED RULEMAKING	SUMMARY OF COSTS	SUMMARY OF BENEFITS
Clarification of Prospectus Extensions at 36 FR § 51.11	**Costs Unlikely** because the Proposed Rulemaking is an administrative change in the timing of extensions.	**Administrative Savings.** Reduced "No Bid" solicitations and "unnecessary extensions." The specific instances in which these savings could occur are unknown, but the number of instances is expected to range from four to 24 each year. **Avoid Disruption in Visitor Services.** The primary intended benefit of the proposed regulatory change is to ensure park visitors have continual access to visitor services. The type of concession contracts or services that may be affected by this type of disruption is unknown. While this analysis is unable to monetize the benefits of the Proposed Rule change, avoiding disruptions in visitor services would result in positive net benefits.
Greater Flexibility for Awarding Temporary Contracts at 36 FR § 51.24(a)	**Costs Unlikely** because, although the potential for suppressed competition could exist, the Proposed Rule would only occur in instances where the Service receives no bids for a particular prospectus and the concession contract requested therein.	**Avoid Disruption in Visitor Services.** The primary intended benefit of the proposed regulatory change is to ensure park visitors have continual access to visitor services. The type of concession contracts or services that may be affected by this type of disruption is unknown. While this analysis is unable to monetize the benefits of the Proposed Rule change, avoiding disruptions in visitor services would result in positive net benefits. While the specific instances in which these improvements could occur are unknown, this analysis expects no more than one instance per year. **Administrative Savings.** The Service may avoid expending staff time to address impacts of expired contracts and loss of services at affected parks. **More Favorable Contract Terms.** To the extent that a concessioner is able to negotiate more favorable contract terms through a temporary contact, the variable cost of concession operations would decrease and producer surpluses increase.

[40] E.O. 12866 directs agencies to base regulatory decisions on "the best reasonably obtainable scientific, technical, economic, and other information concerning the need for, and consequences of, the intended regulation" (58 FR 51736).

APPENDIX A. SMALL ENTITY IMPACT ANALYSIS

A.1. REGULATORY CONTEXT

In accordance with the RFA as amended by the 1996 SBREFA, when a Federal agency publishes a notice of rulemaking for any proposed or final rule, it must make available for public comment a RFA that describes the effect of the rule on small entities (i.e., small businesses, small organizations, and small government jurisdictions).[41] No regulatory flexibility analysis is required, however, if the head of an agency certifies that the rule will not have a significant economic impact on a substantial number of small entities (SISNO).

SBREFA amended the RFA to require Federal agencies to provide a statement of the factual basis for certifying that a rule will not have a significant economic impact on a substantial number of small entities. As stated in SBA guidance, what constitutes "significant" and "substantial" "will vary depending on the problem that needs to be addressed, the rule's requirements, and the preliminary assessment of the rule's impact." According to SBA, to meet the requirements of affecting a "substantial number," agencies should use the broadest category, "more than just a few."[42]

Importantly, the impacts of the Proposed Rule must be *both* significant and substantial to prevent certification of the rule under the RFA and to require the preparation of an initial regulatory flexibility analysis. If a substantial number of small entities are affected by the Proposed Rule, but the per-entity economic cost is not significant, the Service may certify. Likewise, if the per entity economic cost is likely to be significant, but the number of affected entities is not substantial, the Service may also certify.

A.2. SBREFA ANALYSIS

To determine the potential impact of a Proposed Rulemaking on small entities, we first consider the number and types of entities potentially affected. In the case of the proposed regulatory changes to the concession services program, concessioners affected by this rule likely fall into two industry sectors: 71 (Arts, Entertainment and Recreation) and 72 (Accommodation and Food Services). According to SBA guidance, small businesses in these two sectors are entities with average revenues (or receipts) less than $7 million.[43]

---

[41] 5 U.S.C. 601 et seq.

[42] Small Business Administration, "A Guide for Government Agencies," "How to Comply with the Regulatory Flexibility Analysis," June 2010.

[43] Small Business Administration. Table of Small Business Size Standards. Accessed on April 30, 2014 at: http://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf.

As previously discussed, CSP managed 494 active concession contracts in 2012. Based on available data on the revenue reported for each contract, the majority (95 percent, or 377 contracts of 395 entities holding contracts) of concession contracts generate revenues less than $7 million (Exhibit A-1). This estimate is similar to the Service's characterization of the concessioner industry from its 1999 Proposed Rulemaking.[44] In 1999, the Agency identified a total of 630 operating concessioners, of which the Agency estimated that 95 percent generated gross receipts of less than $5 million.

EXHIBIT A-1. SUMMARY OF NPS CONCESSIONER SIZE CHARACTERISTICS

SMALL ENTITY CATEGORIES	ESTIMATED NUMBER OF ENTITIES	2012 CONTRACT REVENUES
Small concessioners	377	$194,372,188
Non-small concessioners	18	$970,605,429
TOTAL	**395**	**$1,164,977,617**
Source: Email communication, National Park Service, Commercial Services Program on June 16, 2014.		

The Proposed Rulemaking is not expected to significantly affect a substantial number of the small entities potentially affected by this rule for the following reasons:

- **Clarifying Prospectus Extensions (36 FR § 51.11)**. As discussed in Section 4, this analysis anticipates no more than seven extensions of existing prospectuses in a single year, with an expected average of four extensions per year. While small entities are likely to be affected by a prospectus extension as a bidding party, this analysis does not anticipate that the concessioner will incur any costs associated with an extension of the solicitation date.
- **Greater Flexibility for Awarding Temporary Contacts (36 FR § 51.24(a))**. As discussed in Section 5, this analysis anticipates providing CSP with greater flexibility to issue temporary contacts will affect no more than one entity per year. Because the vast majority of concessions are classified as small businesses, we conclude that no more than one small entity is likely to be affected in a given year.

[44] 65 FR 20668.

APPENDIX B. SUMMARY OF NATIONAL PARKS WITH CONCESSION SERVICES

PARK ID	PARK NAME	NUMBER OF CONCESSION CONTRACTS (2012)*	RECREATION VISITOR TRIPS (2013)
REGIONAL OFFICE CONTRACTS			
AROO	Alaska Regional Office	1	Contracts associated with regional offices may cover concession operations across multiple parks within a region. For example, the Pacific West Regional Office concession contract corresponds to Western National Parks Association's retail operations in parks in the region.
IMFA	Intermountain Regional Office	1	
MWRO	Midwest Regional Office	1	
NERO	Northeast Regional Office	1	
PWRO	Pacific West Regional Office	1	
SERO	Southeast Regional Office	1	
INDIVIDUAL PARK UNIT CONTRACTS			
GOGA	Golden Gate NRA	5	14,289,121
BLRI	Blue Ridge PKWY	7	12,877,368
GRSM	Great Smoky Mountains NP	7	9,354,695
GWMP	George Washington MEM PKWY	2	7,360,392
LAKE	Lake Mead NRA	8	6,344,714
GATE	Gateway NRA	7	6,191,246
DEWA	Delaware Water Gap NRA	1	4,843,350
GUIS	Gulf Islands NS	3	4,837,965
GRCA	Grand Canyon NP	21	4,564,840
CACO	Cape Cod NS	3	4,501,898
YOSE	Yosemite NP	3	3,691,191
INDE	Independence NHP	1	3,553,070
YELL	Yellowstone NP	63	3,188,030
COLO	Colonial NHP	4	3,168,731
OLYM	Olympic NP	5	3,085,340
ROMO	Rocky Mountain NP	18	2,991,141
ZION	Zion NP	2	2,807,387
GRTE	Grand Teton NP	25	2,688,794

PARK ID	PARK NAME	NUMBER OF CONCESSION CONTRACTS (2012)*	RECREATION VISITOR TRIPS (2013)
PORE	Point Reyes NS	5	2,641,808
JEFF	Jefferson NEM	2	2,377,258
ACAD	Acadia NP	4	2,254,922
BOST	Boston NHP	1	2,245,875
CAHA	Cape Hatteras NS	2	2,214,565
GLAC	Glacier NP	6	2,190,374
MORU	Mount Rushmore NMEM	2	2,162,998
ASIS	Assateague Island NS	1	2,056,828
GLCA	Glen Canyon NRA	5	1,991,924
ROCR	Rock Creek Park	1	1,968,995
STLI	Statue of Liberty NM	2	1,883,544
VALR	World War II Valor in the Pacific NM	1	1,786,024
NACC	National Capital Parks Central	2	1,712,858
HAVO	Hawaii Volcanoes NP	2	1,583,209
SEKI	Sequoia NP, Kings Canyon NP	3	1,476,818
JOTR	Joshua Tree NP	1	1,383,340
SLBE	Sleeping Bear Dunes NL	1	1,340,007
HOSP	Hot Springs NP	2	1,325,719
BRCA	Bryce Canyon NP	3	1,311,875
LARO	Lake Roosevelt NRA	2	1,254,409
OZAR	Ozark NSR	21	1,253,703
MORA	Mount Rainier NP	5	1,148,552
SHEN	Shenandoah NP	1	1,136,505
BUFF	Buffalo NR	13	1,125,227
NACE	National Capital Parks East	3	1,091,661
EVER	Everglades NP	4	1,047,116
AMIS	Amistad NRA	1	1,025,151
MUWO	Muir Woods NM	1	954,125
DEVA	Death Valley NP	2	951,972
BADL	Badlands NP	1	892,372
CABR	Cabrillo NM	1	856,128
CACH	Canyon de Chelly NM	1	828,478
FOSU	Fort Sumter NM	1	815,007
CURE	Curecanti NRA	1	814,163
WHIS	Whiskeytown NRA	1	776,025

PARK ID	PARK NAME	NUMBER OF CONCESSION CONTRACTS (2012)*	RECREATION VISITOR TRIPS (2013)
ROLA	Ross Lake NRA	1	725,917
FOMC	Fort McHenry NM & HS	1	678,431
PEFO	Petrified Forest NP	1	644,648
PIRO	Pictured Rocks NL	1	575,450
BISO	Big South Fork NRRA	3	565,063
THRO	Theodore Roosevelt NP	1	545,090
DENA	Denali NP & PRES	19	530,922
CRLA	Crater Lake NP	2	523,027
PAIS	Padre Island NS	2	515,830
GLBA	Glacier Bay NP & PRES	41	500,590
MACA	Mammoth Cave NP	1	494,541
WHSA	White Sands NM	1	490,544
CANY	Canyonlands NP	29	462,242
MEVE	Mesa Verde NP	1	460,237
VIIS	Virgin Islands NP	2	438,601
LAVO	Lassen Volcanic NP	1	427,409
CALO	Cape Lookout NS	1	416,568
CAVE	Carlsbad Caverns NP	1	388,566
BIBE	Big Bend NP	1	316,953
PRWI	Prince William Forest Park	1	309,298
FIIS	Fire Island NS	3	294,219
LIBI	Little Bighorn Battlefield NM	1	277,883
DINO	Dinosaur NM	12	274,361
PINN	Pinnacles NP	1	237,677
VOYA	Voyageurs NP	1	233,390
CHIS	Channel Islands NP	2	212,029
CRMO	Craters of the Moon NM	1	200,525
APIS	Apostle Islands NL	1	148,556
GEWA	George Washington Birthplace NM	1	131,683
BAND	Bandelier NM	1	126,682
LABE	Lava Beds NM	1	105,395
GRBA	Great Basin NP	1	92,893
TICA	Timpanogos Cave NM	1	91,269
ORCA	Oregon Caves NM	2	72,717
WRST	Wrangell-St. Elias NP & PRES	17	69,984
EISE	Eisenhower NHS	1	59,179

PARK ID	PARK NAME	NUMBER OF CONCESSION CONTRACTS (2012)*	RECREATION VISITOR TRIPS (2013)
DRTO	Dry Tortugas NP	1	58,401
CUIS	Cumberland Island NS	1	51,435
LACH	Lake Chelan NRA	2	37,315
BUIS	Buck Island Reef NM	6	28,972
KATM	Katmai NP & PRES	9	28,966
NOAT	Noatak NPRES	3	16,907
ISRO	Isle Royale NP	4	16,274
SAHI	Sagamore Hill NHS	1	14,639
LACL	Lake Clark NP & PRES	2	13,000
GAAR	Gates of the Arctic NP & PRES	1	11,012
YUCH	Yukon-Charley Rivers NPRES	1	3,914
ANIA	Aniakchak NM & PRES	3	134
JODR	John D. Rockefeller JR. MEM PKWY (Grand Teton NP)	4	Visitor data are unavailable for these park units.
NAMA	National Mall & Memorial Parks	2	
	Total	**494**	**165,138,146**

Note: The number of concession contracts in a given park unit does not include regional office contracts.

Source: Email communication, National Park Service, Commercial Services Program on June 16, 2014; National Park Service. 2013. Annual Park Ranking Report for Recreation Visitors in 2013. Accessed on July 14, 2014 at https://irma.nps.gov/Stats/SSRSReports/National%20Reports/Annual%20Park%20Ranking%20Report%20%281979%20-%20Last%20Calendar%20Year%29.