



October 11, 2018

Dear Mr. Joyner,

Since 1919, National Parks Conservation Association (NPCA) has been the leading voice of the American people in protecting and enhancing our National Park System. On behalf of our more than 1.4 million members and supporters nationwide, I write with concern about the National Park Service's Proposed Rule [RIN (1024-AE45)] that revises special regulations related to demonstrations in the National Capital Region.

The National Capital Region is composed of two administrative units: National Mall and Memorial Park and President's Park. In total, these units include more than 1,000 acres of land. The buildings, memorials, statutes and lands within these units are symbols of our country's democracy and are often places where people gather publicly to express their views and criticisms.

NPCA supports the National Capital Region's efforts through this proposed rule to simplify definitions, clarify regulations on processing permit applications and review locations where demonstration and special events are allowed and not allowed. However, NPCA is concerned with the proposal to recover some of the costs associated with demonstrations.

While the National Park Service has the authority to recover all costs of providing necessary service with special use permits, the Service currently only recovers costs from special events and not demonstrations. As defined by the National Park Service regulations, special events include sport events, pageants, regattas, public spectator attractions, entertainments, ceremonies and similar events. We agree with the parks current policies to recover costs for special events.

The definition of demonstrations includes picketing, speechmaking, marching, holding vigils or religious vigils or services and all other forms of conduct that involve communication or expression of views and grievances. In light of this definition, NPCA does not support recovering costs for demonstrations as it could impede people's access to assemble and use their First Amendment rights.

NPCA does not argue the financial impact special events and demonstrations have on these public areas and staff time to ensure the safety of people and resources. However, this proposal to recover costs on demonstrations is not acceptable. Some of our nation's most historic demonstrations occurred on these very lands from the famous Civil Rights March in 1963 to Million Man March in 1995.

NPCA continues to be concerned with inadequate funding levels for national parks that threaten the long-term preservation and enjoyment of our natural and cultural resources. Rather than placing the financial burden directly on the public using these places for

demonstrations, the administration must ask Congress to increase – rather than decrease – annual appropriations and specifically request an allocation from Congress to directly recover the costs of staffing and restoring areas following demonstrations. The National Park Service must have the resources to properly protect these areas and the people that choose to exercise their First Amendment rights.

We hope you will reconsider the proposal that seeks to recover costs from those participating in demonstrations.

Thank you for considering our thoughts,

Emily Douce
Director, Budget and Appropriations
National Parks Conservation Association