

# National Park Service



## **Outline of Major Amendments to 36 CFR Part 51 Required for Implementation of LSI Recommendations of the Concessions Management Advisory Board**

# WASO Concessions Program



## Agenda

- Recommendation Summary
- Key Issues
- Major Amendments



# WASO Concessions Program



## Recommendation Summary

- Recommendation #1: LSI Crediting: Source of Funds
- Recommendation #2: Allocation of LSI to Building and Component Level
- Recommendation #3: Managing LSI: Tracking the Base Value and Depreciation
  - Major regulatory change not required



# WASO Concessions Program



## Key Issues

- Removal of “50 percent” rule and related definitions
- Allow for LSI credit for improvements to existing structures
- LSI credit based on source of funds
- Provide for LSI allocation to building and component level

# WASO Concessions Program



## Major Amendments - Part 51

- Definitions to be deleted (50 percent rule)
  - Major Rehabilitation
  - Pre-Rehabilitation Value
  - Replacement Cost
- Definition to be added
  - Repair and Maintenance



# WASO Concessions Program



## Major Amendments – Part 51

- Provide for allocation of LSI on a building by building and building component basis



# WASO Concessions Program



## Major Amendments – Part 51

- Eliminate reference to “major rehabilitations” (the 50 percent rule)



# WASO Concessions Program



## Major Amendments – Part 51

- LSI Crediting for Source of Funds:
  - Provide that CFIP and other concessioner-funded improvements to existing structures will be credited to LSI
  - Improvements funded out of Repair and Maintenance Reserve will not be credited to LSI



# WASO Concessions Program



## Major Amendments – Part 51

- LSI Crediting: Repair and Maintenance Reserve
  - Conforming amendments to Repair and Maintenance Reserve
    - Concessioner may choose to fund needed improvements with its own funds with NPS approval, or may utilize funds contained in Repair and Maintenance Reserve
    - Unexpended balance (if any) in the Repair and Maintenance Reserve account will be paid to NPS as additional franchise fee

