

NPS Responses to Questions on Solicitation # VA-BRCA003-25

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To: All Recipients of the Request For Proposals (RFP), Solicitation No. VA-BRCA003-25, to Manage Commercial Visitor Services at Bryce Canyon National Park under the Visitor Experience Improvements Authority ("VEIA")

In the RFP issued April 17, 2025, the National Park Service ("NPS") stated it would accept questions about the RFP submitted in writing and received by May 22, 2025. Below, the NPS has responded to questions about the RFP received within the allotted time.

Glossary of terms used throughout this document.

Draft Management Agreement: refers to the draft Bryce Canyon National Park Management Agreement No. VA-BRCA003-25 under Solicitation #VA-BRCA003-25

Respondent(s): refers to an entity submitting a proposal in response to Solicitation # VA-BRCA003-25

TRANSITION

QUESTION 1. Regarding the transition services –

- a. How and when will the Service fund the transition services?
- b. Will the Owner fund operating expenses related to Transition Services?
- c. Is there a budget that the Service is working within, if so, can you please share the budget.

- d. For awareness, transition services are estimated to be more than \$4M, has the NPS contemplated this expense?

NPS RESPONSE: Responses to parts a and b of this question are found in Section 3.29 and Article 13 of the Draft Management Agreement. Concerning parts c and d of this question, the Service is not releasing the details of its transition budget at this time. Response Requirement 7) of the RFP asks respondents to identify and quantify anticipated transition expenses and provide a preliminary transition budget.

QUESTION 2. Will the trademarked names transition with a potential contract transfer?

NPS RESPONSE: See Article 11 of the Draft Management Agreement.

QUESTION 3. Please confirm whether the website domain ownership and social channels would also transfer and if these would be part of the purchase of existing equipment and furniture owned by the concessioner? If not, has a value been placed on these items –

- a. visitbrycecanyon.com/
- b. x.com/TravelARAMARK
- c. facebook.com/brycecanyonlodge/
- d. instagram.com/brycecanyonlodge/

NPS RESPONSE: If the Service were to decide to purchase these website domains and social channels, they would be included in Transition Services (defined in Section 13.1 of the Draft Management Agreement). However, the Service will consider the value to the operation of such domain names before deciding whether to include the purchase of them in the Transition Services.

QUESTION 4. Who owns the domain visitbrycecanyon.com?

NPS RESPONSE: The existing concessioner owns this domain. See response to Question #3.

QUESTION 5. What travel partner agreements are in place that the new operator would have to honor?

NPS RESPONSE: If there are travel partner agreements that would be appropriate to transfer to the new operator, the Service expects this to be coordinated as part of Transition Services.

QUESTION 6. Is the NPS open to leasing furniture temporarily until the Management Company can work with an Interior Designer and Purchasing Agent to provide suitable, rustic, yet modern furniture and soft goods to enhance the property's position? The idea is to spend dollars once and do it right the first time.

NPS RESPONSE: The Service is open to evaluating such a proposal. Please be sure to describe your proposed approach and associated modifications to the Draft Management Agreement in your response to RFP Response Requirements 7) Transition and 10) Acceptance of Draft Management Agreement.

QUESTION 7. Are all the artifacts and the notices of authenticity owned by the NPS or the current concessionaire and in the future will they be owned by the NPS, or the Management Company/Asset Management company arrangement?

NPS RESPONSE: The existing concessioner owns all the personal property currently used for the operation. Per Section 13.1 of the Draft Management Agreement, the Management Company will advise the Service on the appropriate pricing for existing FF&E and/or the sourcing and purchase of required new FF&E.

EMPLOYEE HOUSING

QUESTION 8. Will the Service subsidize the Management Company for employee housing that is located outside of the Area.

NPS RESPONSE: No.

QUESTION 9. If a shuttle system is needed to support staffing due to the lack of housing, would there be dedicated space allocated for that system?

NPS RESPONSE: The Service would work with the Management Company to identify an appropriate location where a small number of shuttle vans could be parked.

QUESTION 10. If the operator houses its employees outside the park, can the operator run an employee shuttle and count that expense as an operating expense?

NPS RESPONSE: The Service may consider this during the evaluation of Response Requirement 8) Operating Projections or in future operating budget proposals.

QUESTION 11. Is the NPS open to leveraging technology to reduce the number of employees requiring in-area housing?

NPS RESPONSE: Yes.

QUESTION 12. Can you please provide a breakdown of housing utilization between the NPS and concessionaire by each building/site?

- a. Whispering Pines Dormitory
- b. Ponderosa Dormitory
- c. Manzanita Lodge
- d. Knotty Pine Dormitory

- e. Bunkhouse
- f. Bunkhouse Trailer Sites

NPS RESPONSE: There is currently no NPS housing use in these buildings/sites; however, as stated in the RFP, page 7-8, "Strategies that result in a reduced need for in-Area housing will be welcomed, as the Service would prefer to allocate some of the employee housing outlined below to NPS staff."

QUESTION 13. Does the current concessionaire have offsite housing and RV sites being utilized by their staff? If so, how many units and employees are located there? Is there a plan for that moving forward?

NPS RESPONSE: The Service is not aware of the existing concessioner operating off-site housing or RV sites for its staff under the existing concession contract. Please note that RFP Response Requirement 6) Project Understanding requires respondents to describe how they will provide for employee housing and recreational activities while limiting or reducing the need for in-Park employee housing.

QUESTION 14. Is the current concessionaire charging employees for room and board and if so, what are the rates?

NPS RESPONSE: Current concessioner employees are charged for room and board. The existing concession contract allows the existing concessioner to charge its employees an amount equal to the cost of providing housing, food, and recreational services.

HISTORICAL DATA AND BACKGROUND

QUESTION 15. Regarding the historical revenues by department, could the Service please provide the following –

- a. Historical monthly occ and ADR for lodging, at a minimum this is need for 2024 as we are to keep Occ and ADR the same as 2024 in our 3-year operating proforma. Regarding the operating projections, are we to keep the Hotel revenues the same as 2024 for the first 3-year so of the proforma, or just for the first year?
- b. Annual restaurant covers and avg. check by meal period for breakfast, lunch, and dinner at the restaurant and pizzeria
- c. Annual transactions and avg. check for the gift shop and general store

NPS RESPONSE: For part a of this question, the Service has amended the RFP Response Requirement 8) Operating Projections to clarify that respondents are to assume that occupancy and average daily rates remain the same as the NPS-provided projections for the first year of operations under the Draft Management Agreement. Respondents should use their judgement in deciding the inflation of those projections over the three years. For parts b and c of this question, the Service does not have the requested information.

QUESTION 16. Is there any guest data or studies on demographics, geographics or psychographics of visitors to Bryce Canyon NP that could be shared?

NPS RESPONSE: The most recent visitor survey information can be found at this link:

<https://irma.nps.gov/DataStore/Reference/Profile/2303018>

QUESTION 17. How many additional concession contracts and CUAs are located within Bryce Canyon National Park and what are the corresponding visitor services and company names?

NPS RESPONSE: There are two additional concession contracts: BRCA001-23, held by Bryce Canyon Association for the sale of visitor convenience items, and BRCA002-17, held by Bryce-Zion Trail Rides, Inc., providing guided interpretive trail rides. The Park issues approximately 120 CUAs per year, with the majority authorizing bike tours, walking/hiking tours, and photography instruction.

QUESTION 18. Who are the key partners in the park?

NPS RESPONSE: Key partners for the Park include the Bryce Canyon Association, Ruby's Inn, Bryce Canyon City, Red Canyon Transit, local United States Forest Service and Bureau of Land Management locations, Garfield County, Kane County, concessioners, tribal partners, and Southern Utah University.

QUESTION 19. If the shuttle service is needed to support future growth, what plans does the park have to help increase ridership? Additionally, where would the shuttle system be housed, and would this impact or reduce general parking availability?

NPS RESPONSE: The Service will continue to promote the use of the shuttle. The shuttles are currently housed in a location outside of the park that does not impact or reduce general parking availability.

QUESTION 20. Does the current operator have STAR benchmarking reports available?

NPS RESPONSE: No.

QUESTION 21. Why is the property not currently operating year-round?

NPS RESPONSE: Historical demand in the winter months has not been high enough to warrant keeping the facilities open. However, winter demand is on the rise and the NPS is interested in increasing visitation during the shoulder and winter months. See the Historical Visitation section of the RFP (page 14) and RFP Response Requirement 6)f).

QUESTION 22. In the "Historical Revenues by Department" chart, is the General Store's grab-and-go food included in the Food and Beverage or Retail line item?

NPS RESPONSE: Retail.

QUESTION 23. Can the NPS or current operator provide a breakout of grab-and-go food sales from the "Retail Projections" chart?

NPS RESPONSE: No. The NPS cannot provide the breakout of grab-and-go food sales from the Retail projections.

QUESTION 24. Can the current operator provide a breakdown of the existing 139 employees by department?

Additionally, is there an employee list available to get a handle of current staffing levels including position/job title and rates of pay?

How many staff under the current contract are full-time year-round?

NPS RESPONSE: The 139 employee number referenced in the RFP is a representative sample of the size of staff who have resided in the assigned employee housing. The Service will not provide an employee list or the number of staff the existing concessioner employees as full-time year-round because this type of information could be considered confidential to the existing concessioner.

QUESTION 25. What process is currently used by the NPS to establish or modify the rate ranges?

NPS RESPONSE: Under the existing concession contract, TC-BRCA003-23, the rate methods per service are as follows.

Lodging: Core Rooms method

Retail: Competitive Market Declaration method

Food and beverage: Core Menu method

These methods are described in the 2017 Concession Management Rate Administration Guide and 2024 Rate Administration Guide Addendum, which can be found here: [Rate Administration - Concessions \(U.S. National Park Service\)](#)

QUESTION 26. Are there Org Charts available to show the current management structure utilized under the current concession contract?

NPS RESPONSE: No.

QUESTION 27. Does current concessionaire utilize J-1 or H-2B workers and if so, how many?

NPS RESPONSE: The Service does not provide this type of information as it could be considered confidential to the existing concessioner.

QUESTION 28. Does the current concessionaire have offsite offices utilized for administrative services relating to the park operations?

NPS RESPONSE: No.

QUESTION 29. Does the NPS dictate current hours of operation of all concession outlets?

NPS RESPONSE: Each concession contract includes requirements for schedule of operation.

QUESTION 30. Can you provide a list of current vendors and service providers?

NPS RESPONSE: The Service cannot provide a list of current vendors used by the existing concessioner because this type of information could be considered confidential to the existing concessioner. See response to Question 17 on other visitor service providers that operate in the park.

QUESTION 31. Is there a current fire mitigation plan that can be shared?

NPS RESPONSE: No.

QUESTION 32. Will you please provide occupancy and ADR numbers by month and broken down between Suites, Motel and Cabins?

NPS RESPONSE: Other than historical revenues by department, the Service will not provide further historical operating information that could be considered confidential to the existing concessioner.

QUESTION 33. What are the current number of room nights on the books through 2026?

NPS RESPONSE: The Service does not have this information available. The existing contract only allows the existing concessioner to accept reservations on a "366-day forward rolling basis".

QUESTION 34. Is the current Environmental Management Plan available?

NPS RESPONSE: No, the Service will not release the existing concessioner's Environmental Management Plan.

SERVICE ESTIMATES

QUESTION 35. How did the Service calculate there would be four table turns during an evening dinner service?

NPS RESPONSE: The Service did not assume four table turns. The Service stated the maximum capacity, assuming four table turns during an evening dinner service, is approximately 650 covers per night. The Service estimated projections, inclusive of all meal periods, is found in the Food and Beverage Projections table in Section IV.D. of the RFP.

QUESTION 36. For the revenue projections, could the Service please provide Restaurant and fast casual covers and avg. check by meal period

NPS RESPONSE: The Service does not have this breakdown by meal period.

QUESTION 37. What are the required hours of operation for the required services? Where these hours of operations used in the revenue projections?

NPS RESPONSE: See Exhibit G, Section II, Part A of the Draft Management Agreement for the minimum operating schedules per service. The required hours were used in the revenue projections.

QUESTION 38. How many NPS beds does NPS desire to gain in the new contract?

NPS RESPONSE: The Service has no specific goal.

RFP RESPONSE REQUIREMENTS

QUESTION 39. Could the Service extend the page count for Section 5? We need to cover 9 topics in 8 pages, which is not sufficient to adequately detail our approach to each topic.

NPS RESPONSE: Yes. The Service has amended the RFP to allow for up to 10 pages for Response Requirement 5).

QUESTION 40. Could the Service extend the page count for Section 6? We need to cover 7 topics in 4 pages, which is not sufficient to adequately detail our approach to each topic.

NPS RESPONSE: Yes. The Service has amended the RFP to allow for up to 6 pages for Response Requirement 6).

QUESTION 41. Does National Park Service "concessioner" experience under a standard Category I Concession Contract (for example, the existing Bryce Canyon concession contract) qualify as operating under a "management agreement" to satisfy the "minimum qualifications," as noted in section V. Solicitation Process/B. Requirements/Experience on page 17 of the prospectus?

NPS RESPONSE: For this opportunity, the Service requires experience pursuant to management agreements. Concession contracts do not qualify.

QUESTION 42. Does the 40-page proposal limit include the Cover Page and Transmittal Letter? These required items are not listed as an exception on page 23 of the Request for Proposals.

Does the 40 page count limit (plus sections without page limits) include the proposal cover page and page dividers?

NPS RESPONSE: The Service has amended the overall page limit for proposals to 44 pages, to reflect the increased allowances for Response Requirements 5) and 6). The overall page limit includes all response requirements, other than the listed exceptions, including Response Requirement 1 (Transmittal Letter). If respondents include a cover page or page dividers, respondents should label those pages as not being part of their proposal. The Service will not evaluate, or count against the overall page limit, such labeled pages.

QUESTION 43. For question 9, Financial Proposal, is there a page limit? There is none listed, and it is not included in the list of exclusive responses on page 23 of the Request for Proposals.

NPS RESPONSE: There are response requirements without specific page limits (i.e., Transmittal Letter, Financial Qualifications exclusive of the financial statements, Financial Proposal, and Acceptance of Draft Management Agreement) to allow respondents to decide how to allocate responses within their proposal within the overall page limit.

QUESTION 44. Are the proposal pages limited to letter size (8.5" X 11") or can the respondent use ledger- and legal-sized pages for renderings, schematics, and tables? Are there formatting requirements i.e., font size, margins, etc.? Are there any technical proposal requirements that should be adhered to, i.e. page margins, font size, etc.

NPS RESPONSE: Yes. The Service has amended RFP Section VI.C.1. to include the following instructions after the second paragraph:

Respondents must use letter-size pages, except for schematics or drawings where respondents may use legal or ledger-size pages. Respondents must use 11- or 12-point font for all text within the proposal, including all tables, charts, graphs, and provided forms. The Service will accept images of sample material with smaller fonts. Page margins must be 1 inch. Page numbers and identifications of confidential information may appear within the margins.

RFP PROCESS

QUESTION 45. Where and when are potential interviews expected to be conducted?

NPS RESPONSE: The Service must award the Management Agreement before December 16, 2025. Given the time constraints, if the Service needs to conduct interviews, the interviews would be virtual interviews and occur prior to August 14, 2025.

QUESTION 46. Given the short response period and the novel approach to managing a traditional concession contract, will the Service extend the proposal due date by at least 30 days?

NPS RESPONSE: No. The short response period is necessary given the need to award the Management Agreement before December 16, 2025.

QUESTION 47. How is the evaluation criteria scored?

Can the Service please provide details to the respondents of the scoring criteria and evaluation methodology that will be utilized?

Regarding the RFP Evaluation Criteria, listed on pages 19–21 of the prospectus, by what quantitative or quantifiable matrix will the Service evaluate a Respondent's proposal? Are the criteria listed in order of importance? If not, how should a Respondent ascertain how each criterion is weighted?

NPS RESPONSE: The Service has amended the RFP Section VI.B to change the title from "Evaluation Qualifications" to "Evaluation Scoring Method," delete the first sentence of the second paragraph, and add the following after the second paragraph:

The Service will rank the respondents based on the RFP Evaluation Criteria described in Section VI.A. The Service will organize the evaluation criteria into three groups—1) Qualifications Criteria, 2) Technical Approach Criteria, and 3) Financial Criteria—and score each proposal's responses as they correspond to the evaluation criteria in each of these three groups. For each group, the Service will assign a score that reflects the determined merits of the proposal under the applicable evaluation criteria and in comparison to any other proposals received. The grouping of the evaluation criteria, corresponding Response Requirements (Section VI.C.3.), and maximum score assignable are described below for each Evaluation Criteria group.

Note: Each section of your proposal should have a heading identifying the Response Requirement to which the information provided in that section responds. It is important that your proposal conforms to the organizational framework of Section VI.C.3. and provides all relevant information directly in response to each Response Requirement. The Service may consider relevant information contained elsewhere in a proposal in assessing the proposal's response to each particular Response Requirement.

Qualifications Criteria (0-15 points), includes:

- Minimum Requirements in Section V.B. (Experience and Insurance Requirements)
- Management Services Experience and Qualifications
- Management Team
- Professional Expertise and Service
- References
- Acceptance of Conditions
- Compliance

The corresponding Response Requirements for the Qualifications Criteria include:

- Transmittal Letter
- Executive Summary
- Qualifications, Experience, & References

- Acceptance of Draft Management Agreement
- Respondent Organizational Documents
- Certification

Technical Approach Criteria (0-30 points), includes:

- Approach and Methodology
- Food and Beverage Quality
- Environmental Considerations
- Human Resources and Training
- Management Plan for the Facilities
- Creativity
- Capital Oversight
- Supplemental Information
- Overall Response
- Other

The corresponding Response Requirements for the Technical Approach Criteria include:

- Methodology and Project Management
- Project Understanding
- Transition
- Supplemental Information

Financial Criteria (0-15 points), includes:

- Key Contract Financial Provisions
- Financial Stability and Capability
- Financial Operating Projections

The corresponding Response Requirements for the Financial Criteria include:

- Financial Qualifications
- Operating Projections
- Financial Proposal

FACILITIES

QUESTION 48. Can floorplans be provided for the following locations –

- a. Main lodge building
- b. Fast casual restaurant
- c. General store
- d. Maintenance building
- e. Employee Dorms/Housing
- f. If floorplans are not available, can the service provide sq. ft. of retail storage available within the:

1. lodge
2. general store
3. sq. footage of storage space of the maintenance building
4. sq. footage of each employee housing facility

NPS RESPONSE: The Service can provide floor plans after award. The Lodge gift shop has 528 square feet (SF) of retail storage space. The General Store has 627 SF of storage space. The Dry Goods Storage Building has 1,237 SF of storage space. The square footage of each employee housing facility can be found in Exhibit E, Managed Facilities and Land Areas, of the Draft Management Agreement.

QUESTION 49. When was the most recent condition assessment completed? Can a copy of the condition assessment be shared? (Is a property condition report available?)

Would you please provide a copy of the most recent NPS inspection of facilities operated by current concessionaire?

Are the maintenance records and documentation available for:

- (1) underground utility locate drawings;
- (2) architectural, structural, mechanical, electrical and plumbing for buildings;
- (3) material or labor warranties in effect for buildings; maintenance records;
- (4) recent (past two years) sanitary and sewer line videos;
- (5) lodge domestic hot water and space heating boilers;
- (6) building permits (past 5 years)?

NPS RESPONSE: The last comprehensive condition assessment conducted by a third-party A&E firm was in 2017. The reports and data from the condition assessment will be shared with the Management Company. The most recent inspection of the facilities, redacted to remove any confidential and proprietary information, will be shared with the Management Company. Many of the other requested records may be made available to the Management Company, including underground utility locate drawings, architectural, structural, mechanical, electrical, and plumbing (ASMEP) drawings, domestic hot water and space heating boiler records, and building permits (past 5 years). The material or labor warranties and general maintenance records, typically reside with the existing concessioner and would need to be requested by the Management Company during transition. The NPS does not independently track these warranties. It is unlikely sanitary and sewer line videos (past 2 years) would be available as it is not a standard practice for NPS or concessioner operations unless prompted by a specific repair need.

Prospective respondents should assume that detailed records may be limited. The selected Management Company will be expected to establish a facility documentation system as part of transition services.

QUESTION 50. What is the source of water and are there any restrictions to water usage that the Management Company should be aware of?

NPS RESPONSE: The Park provides water through a well system. There may be periods of water restrictions implemented under drought conditions, and water conservation measures are always of high importance.

QUESTION 51. With the desire to increase winter visitation, what are the road and facility closures for the winter?

NPS RESPONSE: Typically, the main amphitheater section of the park remains open throughout the winter, with intermittent closures of Highway 63 beyond mile marker 3 due to weather conditions and plowing capabilities. NPS-managed restroom facilities at the Visitor Center and Sunset Point stay open year-round.

QUESTION 52. How many designated employee parking spaces? How many parking spots are there throughout the park?

NPS RESPONSE: There are approximately 1400 public parking spots available in the park. Additionally, there are approximately 75 concessioner employee parking spots and 90 NPS employee parking spots.

QUESTION 53. Please provide the boundaries considered in-area which will be used for evaluation. Please define in-Area

NPS RESPONSE: As defined on page 1 and page 3 of the RFP, "Area" is interchangeable with "Park" and refers to Bryce Canyon National Park. "In-Area" means in Bryce Canyon National Park.

QUESTION 54. When the underground conduits for phone and internet service were originally installed, was a larger conduit included to accommodate potential future expansion?

When was the "new" fiber optic infrastructure installed? What speed is it currently at?

NPS RESPONSE: The size of the underground conduit is not known. Fiber optic was installed in fall of 2019. Future expansion discussions would need to occur with the Service. Speeds are variable but generally at least 10mbps for users.

QUESTION 55. Has the existing office space been sufficient for operating the facilities prior to the proposed reduction and repurposing for more efficient storage use?

NPS RESPONSE: Current office space is sufficient to operate the facilities.

QUESTION 56. How many of the cabins have been upgraded with tankless water heaters and how many still have tanks?

NPS RESPONSE: There are tankless water heaters installed in the Western Cabins (HS-200-214). The majority of structures still rely on tank water heaters.

QUESTION 57. Is the yearly power consumption and propane usage available per building or for all of the buildings?

NPS RESPONSE: This information is not available.

QUESTION 58. A considerable number of building roofs need repainting. Who completes this (Park Staff, Concession Staff, Contractor)? Is fire retardant paint being used?

NPS RESPONSE: Roofs will be maintained by the Management Company. Repainting would be completed by Management Company staff or their contractors, in accordance with the terms of the Draft Management Agreement.

The cedar shingles are currently painted with an acrylic stain or an acrylic latex exterior paint. The NPS would provide or approve the finish requirements, including paint type and color, to ensure compliance with historic preservation and safety standards.

QUESTION 59. There are a number of slash piles throughout the park, who performs that work?

NPS RESPONSE: Any current slash piles are the responsibility of the Service.

QUESTION 60. Under a new management agreement format, will there be any changes to designated responsibilities between management staff and NPS staff in the areas of snow removal, roof painting, pine needle clearing, etc.?

NPS RESPONSE: No, the intent is that the Management Company will maintain these operations as part of the agreement. See Section 3.15 (General Maintenance - Non-Capital Replacements) of the Draft Management Agreement, as amended. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30. .

QUESTION 61. What is the water source and is there a recent water test showing hardness and PH?

NPS RESPONSE: NPS operates and maintains the park's well water system, which supplies potable water to the facilities managed under this agreement. A recent water test is not available.

QUESTION 62. Is sewage treated in the park?

NPS RESPONSE: Yes, at Bryce Canyon National Park, the National Park Service (NPS) operates and maintains its own water and wastewater utility systems—they are not provided by a municipality.

QUESTION 63. Is the garbage and recycling services provided by the NPS or an outside vendor?

NPS RESPONSE: An outside vendor.

QUESTION 64. How many DEMARC locations are there for fiber and phones?

NPS RESPONSE: This information is not available.

QUESTION 65. Would any of the facilities covered under the contract be able to be operated year-round in freezing temperatures? Is there a current winterization plan for the facilities that can be shared?

NPS RESPONSE: Yes, there are facilities that can operate in the winter. Exhibit G, Section III.A.2.e. outlines requirements for winter closures.

QUESTION 66. Will maintenance staff be required to be licensed in trades (Electrical, Plumbing, Refrigeration, Boilers)?

NPS RESPONSE: Licensing requirements for maintenance staff will depend on the scope of work being performed and applicable state and local regulations. For specialized trades such as electrical, plumbing, refrigeration, or boiler operation, appropriate licensure or certification is typically required if the work involves systems that must be serviced or inspected by a licensed professional under code or safety requirements.

The Management Company is responsible for ensuring all maintenance activities are conducted in compliance with federal, state, and local laws, including any applicable licensing requirements. The Service may request verification of credentials, where necessary, particularly for life-safety or code-related work.

FF&E

QUESTION 67. Regarding the existing furniture and equipment owned by the existing concessioner –

- a. What is the estimated value?
- b. Is there a list of the concessioner owned furniture and equipment to review?

NPS RESPONSE: See the Draft Management Agreement, Section 13.1, Transition Services. The Service will provide the Management Company an initial draft list of the existing concessioner's personal property to assist with transition services.

QUESTION 68. Does the National Park Service intend to purchase the FF&E from the current concessioner? Who owns the artwork in the Lodge?

NPS RESPONSE: See the Draft Management Agreement, Section 13.1, Transition Services. The existing concessioner owns the artwork in the Lodge.

QUESTION 69. Will “Owners Investment” also encompass personal property purchases by the management company from the current concessionaire that are necessary to activate the operation? While these may be considered start-up costs and/or working capital needs, it isn’t clear if that investment would be funded by the Owner.

NPS RESPONSE: “Owner’s Investment” is defined on page 10 of the Draft Management Agreement. Draft Management Agreement Section 13.1, Transition Services, states, “The Owner will fund the Transition Budget to allow the Management Company to acquire the appropriate FF&E required to operate the Hotel[.]”

QUESTION 70. Who currently owns the various bikes and related equipment being rented from the historic service station?

NPS RESPONSE: The existing concessioner.

QUESTION 71. Will the Management Company receive any funds for Personal Property upon Transition? The Management Company would like to receive Personal Property transfer to allocate for Capital Projects.

NPS RESPONSE: See the Draft Management Agreement, Section 3.14 Capital Budgets (as amended) and Section 13.1, Transition Services. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener’s errors including the Section numbers 3.11-3.30.

QUESTION 72. Can you provide information on the current Property Management System, Point of Sale Systems and any other software being utilized by the concessionaire during the normal course of business? Is it possible to change these out?

NPS RESPONSE: The Service will provide the requested information to the Management Company for the Management Company to provide Transition Services (see Section 13.1 of the Draft Management Agreement and the definition of “Owner’s Investment” in the Draft Management Agreement). The Management Company will advise the Owner on the appropriate pricing for existing FF&E and/or the sourcing and purchase of required new FF&E.

QUESTION 73. How old is the phone system and what model is it?

NPS RESPONSE: The Service will provide the requested information to the Management Company for the Management Company to provide Transition Services (See Section 13.1 of the Draft Management Agreement and the definition of “Owner’s Investment” in the Draft Management Agreement).

MANAGEMENT AGREEMENT TERMS

QUESTION 74. When is the expected start date?

NPS RESPONSE: The Draft Management Agreement has an “Execution Date” and “Commencement Date”. The “Execution Date” is the date of award, when both parties have signed the agreement. The “Execution Date” will be in early December 2025. The “Commencement Date” is the date the Management Company begins operating the Hotel. The Service anticipates the “Commencement Date” will be January 1, 2027. The 12-plus months between the “Execution Date” and the “Commencement Date” will enable the Service, existing concessioner, and Management Company to transition and prepare for operations to commence under the Management Agreement on the “Commencement Date”.

The Service has amended the Draft Management Agreement and RFP to clarify these dates.

QUESTION 75. Could you please clarify the reason why the VEIA Asset Manager will report into WASO instead of the Park Superintendent? Additionally, will the Management Company be reporting to the Asset Manager or the Park Superintendent?

NPS RESPONSE: Given that the solicitations for VA-BRCA003-25 and AMC-BRCA00X-25 are the initial solicitations under the VEIA, the WASO Commercial Services Program will initially provide assistance and oversight for both authorizations. See Draft Management Agreement Section 4.10 Owner Representatives.

QUESTION 76. If the Management Company makes an investment above and beyond what the Service is obligated to, would the Management Company be able to obtain LSI?

NPS RESPONSE: No. See 54 U.S.C. § 101934. Capital improvements.

QUESTION 77. Will the Management Company be allowed to use AI-powered revenue management technology?

NPS RESPONSE: The Service would need to evaluate such an option pursuant to the terms and conditions of the Draft Management Agreement.

QUESTION 78. The EMP and RMP have been updated and to what extent will this inform the AOR and Periodic Evaluations?

NPS RESPONSE: See Draft Management Agreement Exhibit G, Section II.N. (Periodic evaluations and inspections), Section II.X. (Risk Management Program), and Section II.Y. (Environmental Management Program). There is no specific annual operating report requirement under the Draft Management Agreement.

QUESTION 79. Regarding FTO vs. PTO, PTO is the only option in the Management Agreement model, and how does this apply to FTP onsite? Section 3.9 describes the Offsite Corp Resources, as Operating Costs and no fund is needed for this; please confirm.

NPS RESPONSE: See Draft Management Agreement definition of “PTO Account” on page 11, Sections 3.9.A and B, and Section 3.11.E (as amended). **Note:** The Service has amended the Draft Management Agreement to correct various scrivener’s errors including the Section numbers 3.11-3.30.

QUESTION 80. Section 3.3, The Manner of Operations mentions that the Manager will be held accountable to Hotel Industry Standards. Please confirm is Hotel Industry Standards or Periodic Evaluations the standard, or is it both as the RFP is written?

NPS RESPONSE: The Operating Standards are the minimum requirements for providing services and operating the Hotel. The Management Company must operate the Hotel in accordance with the Operating Standards. The Management Company must perform all its services in a diligent and professional manner. The “diligent and professional manner” the Management Company performs its services must be in accordance with recognized standards of the hotel management industry.

QUESTION 81. For the NPS Budget Approvals, the RFP reiterates the NPS approves everything and if an agreement cannot be reached the decision will divert to the budget of the most recent approved Contract. How would this work in practice to mitigate risk if there was imminent operational risk to the services provided, revenue streams and/or any other conflicts that would undermine the offset of overhead costs? See Section 3.4, Adherence to Budgets

NPS RESPONSE: See Draft Management Agreement Section 3.12.E. (as amended) and Draft Management Agreement Section 7.2 Emergencies. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener’s errors including the Section numbers 3.11-3.30.

ASSET MANAGEMENT COMPANY

QUESTION 82. Can the Corporate entity of the Management Company, LLC act as the Asset Manager to oversee the Management Contract Agreement?

NPS RESPONSE: No.

QUESTION 83. Can an existing concessionaire be the Asset Management company?

NPS RESPONSE: No.

QUESTION 84. What operations if any does the Asset Management Company perform? See Article 4, Section 4.1

NPS RESPONSE: The Asset Manager will provide hospitality asset management services to assist the NPS in overseeing and administering the activities under the Draft Management Agreement. The Asset Manager will not perform operations.

QUESTION 85. What influence does the Asset Management Company have on strategy and operations for the management company? In which areas? E.G. pricing, channel management, capital budgets, operating budgets, etc.?

NPS RESPONSE: The Asset Manager, as the NPS's advisor with respect to specified business reviews and recommendations related to the Management Agreement, will assist the NPS in achieving the NPS's objectives of expanding, modernizing, and improving the facilities and services provided to Park visitors under the Management Agreement. The Asset Manager will serve as a liaison between the NPS and the Management Company and represent the NPS in all discussions and negotiations regarding operating functions. This includes but is not limited to addressing performance, compliance, and operational strategies to ensure the Management Company's performance under the Management Agreement aligns with the NPS's objectives. The Asset Manager's scope of work is extensive, and includes the areas of:

- Subject matter expertise for the selection and transition of the Management Company,
- Oversight of the Management Agreement,
- Planning and Strategy,
- Financial Oversight and Reporting,
- Facilities, Personal Property, and Capital Improvement Plan, and
- Quality Assurance.

VISITOR SERVICES

QUESTION 86. Who operates the campgrounds? How will the Management Company support that operation in the new contract?

NPS RESPONSE: The Service currently operates the campgrounds. See the RFP, page 10 that states "To provide a more diversified range of visitor lodging opportunities, the Service may consider having the Management Company explore adding camper cabins, managing part of a campground, or other changes to campsites in response to changing visitor demands."

QUESTION 87. What are the desired hours and calendar days of each required services under the new contract?

NPS RESPONSE: See Draft Management Agreement, Exhibit G, Section II, Part A for the minimum operating schedules per service.

QUESTION 88. What is the limitation on equipment rental option? Currently, just bikes?

NPS RESPONSE: See the RFP, page 7 (as amended to change a parenthesis to a comma), which states, "The Service will require the Management Company to provide recreational equipment rental, including but not limited to bicycle rentals, and limited retail and snacks related to equipment rentals out of the historic service

station. The Management Company may propose to offer the rental of camping and other summer and winter recreational equipment.” See also Exhibit G, Section II.H (Equipment Rental).

QUESTION 89. What is the rationale for positioning the current facilities as Midscale offerings?

NPS RESPONSE: Midscale is the appropriate option for Park visitors.

QUESTION 90. Can the hotel provide a concierge service to represent all of the NPS vendors and concessionaires rather than providing lobby space solely for the horseback rides?

NPS RESPONSE: No.

QUESTION 91. What is the strategy, in terms of pricing, between the upscale casual and fast casual? They seem to be positioned to compete against each other.

NPS RESPONSE: Upscale casual pricing tends to be higher than fast casual pricing.

QUESTION 92. Can the operator also provide outfitter services from the historic service station?

NPS RESPONSE: The Service may consider this.

QUESTION 93. Can the management company look to exceed NPS service standards and raise the quality of the service offering and facilities to reposition the property into a higher industry classification?

NPS RESPONSE: The Management Agreement will expand, modernize, and improve the condition of commercial visitor facilities and the services provided to visitors while maintaining the required industry classifications described in the Draft Management Agreement Exhibit G Section II (Operating Standards).

QUESTION 94. Will the NPS, Asset Manager, and Management Company have the opportunity to discuss the long-term vision for the property, given current and future consumer trends, prior to establishing capital projects?

NPS RESPONSE: Yes. The process is described in Draft Management Agreement Section 3.14 Capital Budgets, as amended. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener’s errors including the Section numbers 3.11-3.30.

FINANCIAL TERMS

QUESTION 95. Regarding the minimum Owner’s Priority of \$1 million in the first year of operations –

- a. Is this before or after the asset manager fee?
- b. If the Service does not achieve \$1 million in the first year of operations, what are the potential consequences?
- c. Is the threshold \$1 million annually, or is it expected to increase year over year?
- d. Is the Owner's Priority re-calculated on a yearly basis based on the amount of capital investment budgeted to be spent in that year?

NPS RESPONSE: See the definitions of "Owner's Investment" and "Owner's Priority" in the Draft Management Agreement, page 10. The Owner's Priority is not "achieved", but rather calculated and used to calculate the incentive management fee.

QUESTION 96. If the Owner spends \$20M in a year, is it correct that the owner's priority would be \$4M (20% of \$20M)

NPS RESPONSE: Not necessarily. See the definitions of "Owner's Investment" and "Owner's Priority" Draft Management Agreement, page 10.

QUESTION 97. If the Net Cashflow in a year is not enough to cover the Owner's Priority, is the Manager responsible to fund the deficit?

NPS RESPONSE: See Draft Management Agreement Section 5.2 (Incentive Management Fee).

QUESTION 98. On P.33 section 5.2 of the draft contract, the final sentence in the paragraph: Please clarify, if relevant, the anticipated amount of minimum annual cash flow that may be required to authorize payment of the incentive management fee to the Management Company

NPS RESPONSE: The Service does not have an anticipated minimum level of Net Cash Flow below which the Management Company will not be authorized to pay itself an Incentive Management Fee.

QUESTION 99. If there is a deficit in the Net Cash Flow – will the Management Company still be paid a Management Fee?

NPS RESPONSE: See Draft Management Agreement Sections 5.1 (Base Management Fee) and 5.2 (Incentive Management Fee).

QUESTION 100. Please clarify the fiscal calendar that will be used for reporting.

NPS RESPONSE: See the definition of "Fiscal Year" on page 8 of the Draft Management Agreement.

QUESTION 101. Would operating costing include items such as employee IDs, employee uniforms, and work-related PPE? Please provide a comprehensive list of approved cost items.

NPS RESPONSE: See Exhibit F: Transition Budget for a list presented for the information and guidance of respondents to the RFP.

QUESTION 102. Is the NPS prepared to cover operating shortfalls because of seasonality?

NPS RESPONSE: Yes. See Draft Management Agreement Section 3.11.B, as amended. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30.

QUESTION 103. Can a concessionaire bid using the franchise model? If the management (concessionaire) company bids in the franchise fee model, what would the engagement with the Asset Manager look like?

NPS RESPONSE: No.

QUESTION 104. Can the Service please confirm if employees are relocated out of the area, are the ongoing expenses incurred by the Management Company for these employees to be an approved reimbursable expense?

NPS RESPONSE: See Draft Management Agreement Section 3.9 Personnel. The Service will not subsidize the Management Company for employee housing that is located outside of the Area.

QUESTION 105. Detailed on page 18 of the Draft Management Agreement, "All advance payments received from the Owner, revenues received from the operation of the Hotel, including revenues received by approved Third Party Operators, and all items paid by the Management Company arising by virtue of the Management Company's operation of the Hotel must pass through the Operating Special Account or such other bank account(s) established in accordance with this Section 3.11".

Please clarify the definition of "pass through". Can expenses be processed from a Management Company Central Treasury and then reimbursed from the Operating Special Account? For example, if the Management company pays "invoice A" related to operations from Central Treasury, can they withdraw that same amount from the Operating Special Account providing proof of payment/invoice or does the invoice need to be paid directly from the Operating Special Account

NPS RESPONSE: Payments for centralized services are allowed pursuant to the Draft Management Agreement. See Draft Management Agreement Section 3.9.B, Section 3.12.B.viii (as amended), and Section 3.19.A (as amended). **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30.

CAPITAL PROJECTS

QUESTION 106. Regarding the initial capital projects –

- a. when were the initial capital project estimates completed?
- b. Where in the compliance process do these projects currently sit?
- c. Can detailed estimates for the initial capital projects be provided?

NPS RESPONSE: The initial capital projects estimates are in 2026 dollars. Compliance is pending for the projects listed in the RFP. Detailed estimates may be provided to the Management Company after award.

QUESTION 107. Please explain the evaluation criteria that the Service will use to approve capital project requests.

NPS RESPONSE: All improvements and capital projects proposed by the Management Company must be submitted in writing and are subject to NPS approval. NPS retains discretion to approve or deny proposals.

QUESTION 108. Please explain the approval steps and timeline that the Service will require for major capital projects (\$500,000 or greater), including Investment Review Board approvals, NEPA and NHPA Section 106 approvals, and Director's approval.

NPS RESPONSE: Capital projects over \$500K typically require:

National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) Section 106 compliance review,

Investment Review Board (IRB) approval if federally funded or strategically significant,

Director's approval depending on scale, location, and policy impacts.

These steps are governed by internal NPS review protocols. Timelines vary based on project complexity. However, the NPS will coordinate closely with the Management Company to shepherd projects through the necessary approval stages, including compliance and investment review processes.

QUESTION 109. The RFP describes the submission of a five-year capital budget plan and annual approval and allocation of capital project funding. Given this structure, explain how the Service and Operator will plan for major capital projects that require multiple years to develop, approve, and procure?

NPS RESPONSE: See Draft Management Agreement Sections 3.14.A(iv) and (v), as amended. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30.

QUESTION 110. Please explain the Service's expectations and requirements of the Management Company for procuring and approving major capital improvement projects, either directly or through a construction contract with a qualified third party.

NPS RESPONSE: See Draft Management Agreement Section 3.14, as amended. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30.

QUESTION 111. Does the Service recognize that if the capital projects are not approved and implemented based on the proposed schedule, the Management company will not be able to achieve the projected revenues and the guest experience could be impacted.

NPS RESPONSE: The Service recognizes that the timely implementation of these projects can be critical to supporting revenue generation, maintaining service quality, and enhancing the visitor experience.

QUESTION 112. How will the service handle the situation if approvals and access to capita are delayed, or if project approvals take longer than anticipated in the financial projections? Additionally, how will such a situation impact the Service scoring of the Management Company in its annual review?

NPS RESPONSE: The Management Company Project Services responsibilities are described in Draft Management Agreement Section 3.26, as amended. Because Project Services require cooperation with the NPS, Asset Manager, the NPS's design and construction personnel and consultants and their respective designees and consultants with regard to any related design review and project oversight, the NPS and the Management Company will establish a joint capital planning coordination process—through regularly scheduled reviews—to track the status of major projects and flag anticipated approval delays. In the event of significant delays, the Management Company should notify the NPS promptly so that potential operational impacts can be evaluated and addressed through ongoing coordination. The Management Company will develop capital plans and implementation schedules that realistically account for these review processes and associated timeframes. Coordination with the NPS is essential to avoid delays and ensure that project timelines align with operational and financial planning. When delays are due to factors outside the Management Company's control (e.g., regulatory compliance, federal funding constraints, or NPS internal review timelines), those circumstances should be documented in writing and considered during annual performance evaluations.

QUESTION 113. For planning purposes of other capital projects and expanded services could you please provide further clarification around –

- a. When the Service would like the fiber-optic internet service expansion completed
- b. Could the Service provide an initial estimate of the costs associated with the fiber-optic expansion project? Additionally, is there a specific budget that the Service is adhering to for this initiative?
- c. Where is the Service considering the Management Company adding camper cabins? How many camper cabins are desired?
- d. What part of the campground is the Service considering the Management Company operate?
- e. When might the Management Company begin operating a portion of the campground?
- f. Should revenue projections for managing the campground or adding camper cabins be included in the financial projections?

- g. What are the hours of the NPS ranger public presentations and astronomy programs?
- h. Should revenue projections for repurposing the auditorium into a multi-use lounge be included in the financial projections?

NPS RESPONSE: NPS wants to retain flexibility and assess proposals as they are developed—rather than limiting the process with prescriptive directives before internal vetting is complete. The RFP invites respondents to propose ideas that align with their operational model. This includes proposing enhancements—such as fiber-optic installation or camper cabins—as part of their capital improvement plans, allowing NPS to evaluate feasibility during implementation rather than upfront.

- a) For the fiber-optic infrastructure, the timing would depend on future infrastructure planning and coordination with NPS. Any proposed expansion should be included in capital planning as a pending project, subject to NPS approval.
- b) If the Management Company intends to propose fiber-optic expansion, it should be included in the capital improvement plan with a conceptual estimate and identified as contingent on Service coordination and funding.
- c) NPS has an interest in expanding visitor lodging through camper cabins; it does not define a location or desired quantity. The Management Company may propose locations, subject to NPS approval, planning, and compliance review.
- d) and e) The RFP references a potential future opportunity for the Management Company to manage a portion of the campground. This would be determined through future planning discussions with the NPS. The timing of any campground transition would depend on project planning, compliance, and agreement between the NPS and the Management Company.
- f) Revenue projections related to new services (e.g., campground management or camper cabins) could be described in Response Requirement 5) as “Improvements and Enhancements” rather than Response Requirement 8) (Operating Projections).
- g) These programs are typically managed by NPS and may vary seasonally. Coordination with park staff will be necessary to align services.
- h) If the Management Company proposes repurposing the auditorium (e.g., as a multi-use lounge), related revenue projections could be included in Response Requirement 5) as “Improvements and Enhancements” rather than Response Requirement 8) (Operating Projections).

QUESTION 114. We understand capital projects are to be funded by the special account, if funds are not available will there be another source to fund capital projects?

NPS RESPONSE: See Draft Management Agreement Section 3.14.A, as amended. All proposed Capital Budgets must include a request for any additional funds that may be required to fund Capital Expenditures in excess of funds available in the Special Account for Capital Expenditures. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener’s errors including the Section numbers 3.11-3.30.

QUESTION 115. Please provide a list of anticipated capital spend by year for the contract term

NPS RESPONSE: During transition, the Management Company will work with the NPS and the Asset Manager to develop the Capital Budget for Fiscal Year 1 or partial Fiscal Year 1. Beyond Fiscal Year 1, the Management Company is required under Section 3.14.A of the Draft Management Agreement, as amended, to submit a rolling five-year capital improvement plan, updated annually, identifying proposed projects, funding levels, and implementation timelines. The National Park Service has not provided a full-term capital spending schedule; future spending will be developed through this collaborative planning process. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30.

QUESTION 116. If camper cabins are installed in the campground, does the proposed area already have the necessary infrastructure in place for water, sewage, and electricity? Or is there a proposed common bathroom and shower house to be used? Is there a proposed location?

NPS RESPONSE: The infrastructure for water, sewage and electricity does not exist in the campground loops where camper cabins could be placed. The General Store has a bathroom and showers, and there are existing bathroom facilities throughout the campgrounds. Currently, there is no specific proposed campground loop for the location of camper cabins. The Management Company may propose a camper cabin development concept, including assumptions about infrastructure needs, during capital planning discussions. Site planning, utility assessments, and compliance requirements (NEPA, Section 106) would be coordinated with the NPS as part of the approval process.

QUESTION 117. Will the selected management company be able to recommend what facilities or services should be expanded, modernized, and/or improved, in addition to what the NPS has included in the RFP?

NPS RESPONSE: Yes. The RFP explicitly asks how respondents will assist the NPS in achieving its objective to expand, modernize, and improve the condition of commercial visitor facilities and services and to provide any other innovative ideas that would enhance the visitor experience (see Response Requirement 6)).

The selected Management Company also is encouraged to recommend facility or service improvements in addition to those described in the RFP. Under the terms of the Draft Management Agreement, the Management Company is required to submit an annual proposed Capital Budget, which may include proposals for modernization, expansion, or service enhancements. These proposals are subject to NPS review and approval, including applicable compliance and funding requirements.

QUESTION 118. Have the estimated costs for the initial capital projects taken tariffs, supply chain, and labor conditions into consideration? Our estimated cost for replacing the roofs at the property are higher than typical NPS \$307k estimations in the RFP. How do we approach the variance to cover our costs with respect to the new Asset Management and Management Contract agreements and are there plans in place to address this?

NPS RESPONSE: The estimated costs for the initial capital projects included in the RFP reflect a preliminary estimate that may be revised based on input from the Management Company and evolving market conditions.

The Management Company is encouraged to assess evolving market conditions as part of its project planning and propose budget adjustments where warranted. Final capital project budgets are subject to review and approval by the NPS, and the Service recognizes that market conditions may affect both cost and timing. For more information, see Sections 3.4 ("Adherence to Budgets") and 3.14 ("Capital Budgets") of the Draft Management Agreement, as amended. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30.

QUESTION 119. Will the Management Company have the ability to select the 3rd party design and construction personnel and consultants and/or use its internal services?

NPS RESPONSE: See Draft Management Agreement Sections 3.26 and 3.29, as amended. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30.

QUESTION 120. Will the Management Company propose the maintenance and capital projects - or will the Asset Manager decide on this?

NPS RESPONSE: The Management Company is responsible for proposing maintenance and capital projects pursuant to the Draft Management Agreement, including Sections 3.14 and 3.15, as amended. The approval process will ensure that projects reflect both the Management Company's operational priorities and the Service's broader stewardship goals. **Note:** The Service has amended the Draft Management Agreement to correct various scrivener's errors including the Section numbers 3.11-3.30.

QUESTION 121. For the proposed future campgrounds, would those be sold through Rec.gov or through the management company systems?

NPS RESPONSE: If the Service has the Management Company manage part of a campground, it is likely the Service would want campground reservations to be sold through recreation.gov.

QUESTION 122. Who gets construction permits for projects?

NPS RESPONSE: NPS has legal authority and jurisdiction over the federal lands and facilities it manages, including permitting for construction activities. Construction on NPS-managed federal lands does not typically require local or municipal building permits due to federal sovereignty. However, all projects must comply with applicable national code standards and undergo internal NPS design and environmental reviews, including NEPA and Section 106, as applicable.
