



**Barclay Trimble/GRCA/NPS**  
06/08/2011 11:51 AM

To: Kurt Rausch/WASO/NPS@NPS  
cc: Jo Pendry/WASO/NPS@NPS, Laura Joss/DENVER/NPS@NPS, Doug Lentz/GRCA/NPS@NPS, Robin Martin/GRCA/NPS@NPS  
bcc: Peggy O'Dell/WASO/NPS  
Subject: Re: Fw: Draft Director's Policy Memorandum - Disposable Water Bottles - Comments Requested by June 10, 2011

Kurt,

I appreciate the opportunity to review this documents and thanks for pulling it together. I have made some comments for your consideration which I think focus this more on the ultimate goal, at least of GRCA, to reduce the sale of individual water bottles in the parks. Once you have reviewed the comments if you have any questions I would be happy to talk.

Thanks,



Water Bottle Memo.GRCA Comments. 6.6.11.docx

Barclay

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**Kurt Rausch/WASO/NPS**  
05/27/2011 12:55 PM

To: Barclay Trimble/GRCA/NPS@NPS  
cc: Jo Pendry/WASO/NPS@NPS  
Subject: Fw: Draft Director's Policy Memorandum - Disposable Water Bottles - Comments Requested by June 10, 2011

Hi Barclay:

As you know, the WASO office has been working on developing a policy memo for the Director on the disposable water bottle issue. We appreciated your offer to help on this.

A draft memo is attached. It outlines an approach developed at the WASO-level in which Parks will offer visitor choice and education. Parks will be asked to provide 1) continued disposable water bottle availability, 2) ask concessioners to sell reasonably priced refillable water bottles, 3) install water bottle filling stations, and 3) educate visitors on the benefits of refillable water bottle and water filling station use.

We know you have done a lot of work at your Park on this issue. We would appreciate any input you have on the proposed approach and the memo itself. We have also requested input from our Regional Concession Chiefs and are hoping to collect all the comments by June 10. Please feel free to contact me directly at any time if you would like to discuss.

Thank you,

Kurt M. Rausch  
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This memo clarifies the National Park Service Commercial Services Program's recommendations regarding a strategy to reduce the use of water bottles and other beverages in disposable plastic containers in Parks. This recommended policy would further the goals of the National Park Service Green Parks Plan and the Climate Friendly Parks Program.

Although the Commercial Services Program is not recommending implementation of a Service-wide ban on disposable plastic water or other beverage containers in parks at this time, the program does recommend that ~~instead, Parks should develop~~ and implement programs to provide visitors with environmentally preferable alternatives to these products, including the sale of reasonably priced BPA-free reusable water bottles, construction of water bottle filling stations, and provision of educational messages to inform visitors on the environmental impacts of their purchasing decisions. Individual Parks should also consider eliminating or significantly reducing the sale of water sold in single use disposable containers following a feasibility determination as outlined below.

Comment [TBC1]: This memo should be a recommendation to the Director not a decision document

#### Background

A growing body of evidence indicates that the use of disposable water bottles has significant negative environmental impacts compared to the use of local tap water and refillable bottles when considered on a life-cycle basis. According to the Environmental Protection Agency, almost 2.5 million tons of plastic bottles and jars were disposed on in the United States in 2008. In general, disposable plastic bottles have an energy intensive lifecycle, including manufacturing, transportation and disposal.

Comment [TBC2]: The policy should allow parks, such as GRCA, that have the infrastructure in place and have undergone a safety and visitor satisfaction analysis to eliminate the sale of single use disposable water bottles on a reasonable timeline as determined by the parks superintendents (as opposed to only allowing the elimination as part of a new concessions contract).

The impacts of using disposable water bottles may be magnified in parks because their remote locationness results in additional product transportation, waste disposal, energy use for cooling, and litter. Concern for the public health impacts from the reduced availability of free, publically available water resulting from the increased disposable water bottle market is also emerging with organizations such as the Center for Disease Control. For these reasons, a reduction in the amount of disposable water bottles sold in parks and the promotion of free water sources is desirable. In addition, parks are in a unique position to educate the visiting public regarding the environmental impact of their purchasing decisions. The elimination of or reduction of plastic water bottles allows the National Park Service and park partners to introduce visitors to green products and the concept of environmentally responsible purchasing and to allow visitors to potentially take that larger environmental ethic home and apply it in their daily lives.

By reducing the use of disposable water bottles and other beverage containers, the Service can reduce litter in some of our country's most beautiful and sacred landscapes, decrease the amount of plastics in the waste stream and the high costs associated with this waste, and reduce greenhouse gas emissions associated with the production, filling, packaging and transport of disposable bottles. A number of Parks, including Zion and Hawai'i Volcanoes National Parks, and their concessioners have already successfully implemented programs to install filling stations and ban the sale of disposable water and other beverage bottles.

~~However, Parks must, however, consider other factors prior to in-making a decisions to reduce or eliminate the sale of water or other beverages in disposable plastic containers on this issue. Some yVisitors have come to rely on the availability of refrigerated bottled water for sale in our parks. Parks should consider. A sudden water bottle ban could impact visitor satisfaction and should ensure that proper educational materials and infrastructure are in place prior to reducing or eliminating the sale of disposable water bottles. In addition, parks should consider. More importantly, it could impact public safety and should work with park concessioners and partners to ensure visitors are able to purchase a wide range of refillable containers, including reusable bottles that are in a similar price range to water sold in disposable bottles. Parks should also consider if visitors come unprepared and are not willing or able to purchase and fill a water bottle. Possible infrastructure constraints, the and feasibility cost of for the parks to provide water filling stations and possible local water supply shortages are additional considerations.~~

**Comment [TBC3]:** There are reusable water bottles starting at \$1.99 and a similar size disposable water bottle starts at \$1.49 at GRCA. Not enough of a difference to warrant writing "not able to purchase or fill a water bottle."

~~In some circumstances, a disposable water ban may unreasonably impacts to our concessions operations should also be considered prior to reducing or eliminating the sale of disposable plastic water bottles. Although, concessions contracts allow the National Park Service to determine the nature, type and quality of merchandise to be sold, parks should still consider financial impacts from lost sales. Many concessioners may find, however, that the loss of revenue generated from the sale of disposable water bottles is balanced by the sale of reusable bottles. Concessioners may also see a resulting reduction in recycling and solid waste cost. Parks should make decisions about reducing or eliminating the sale of disposable bottles in consultation with concessioners and should allow reasonable time for transition. The elimination or reduction of the sale of disposable bottles and development of associated educational and marketing tools may be integrated into concessioners' environmental plans. if the Service requires them to provide filling stations without charge to the visitors and loss revenue from disposable water bottle sales. Finally, some have argued that removing disposable water bottles will drive visitors to purchase less healthy alternatives such as soda and sugary beverages, which also often are sold in disposable plastic containers.~~

**Comment [TBC4]:** Concession contracts also allow the suspension or termination of services at any time based on resource concerns (that is probably referring to a larger service and we are really dealing with one merchandise item).

**Comment [TBC5]:** This is not necessary. Most concessioners already provide water free of charge upon request (it is the industry standard).

**Comment [TBC6]:** I do not think this is necessary - who is saying this and what data do they have to back it up?

### Strategy

In order to move the Service forward in reducing the environmental footprint from disposable water and other beverage bottles while addressing the above considerations, the Service-Commercial Services Program recommends ~~will~~ implementing a program centered on providing 1) ~~continued disposable water bottle availability,~~ 1) sale of reasonably priced refillable water bottles, 2) water bottle filling stations, and 3) education on the issue, 4) ~~continued disposable water bottle availability, when appropriate.~~ Parks should take the following actions to implement this strategy.

- Conduct planning and research to understand park infrastructure needs and the resource and financial impacts of providing water alternatives, such as selling inexpensive reusable bottles and installing filling stations.
- Where planning and research support it, build the necessary water filling facilities and work with your concessioner to provide reasonably priced BPA-free reusable water bottles ~~disposable water bottles, while initially continuing to sell disposable bottled water. Following further analysis, on a~~

park-by-park basis, superintendents may choose to continue the sale of disposable water bottles or may choose to reduce or eliminate their sale.

- Work with your concessioners to provide signage and educational messaging wherever they sell disposable water bottles as well as at Park and concession maintained water filling stations, outlining the positive impacts of the reusable water bottle alternative both for within the park and at home.
- Work to ensure you have an effective plastic recycling program for your park and concession operations to reduce the impact of disposing of the used water and other beverage containers.
- Track product sales, visitor feedback and recycling statistics to help the Service assess if there are any changes in buying behavior, visitor satisfaction and plastic waste collection rates.
- ~~By reducing the use of disposable water bottles and other beverage containers, the Service can reduce litter in some our country's most beautiful and sacred landscapes; decrease the amount of plastics in the wastestream and the high costs associated with this waste; and reduce greenhouse gas emissions associated with the production, filling, packaging and transport of disposable bottles. A number of Parks and their concessioners have already successfully implemented programs to install filling stations and ban the sale of disposable water and other beverage bottles. The Service encourages them to continue their leadership efforts, track their progress and share their experience with others.~~

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Comment [TBC7]: Moved up to Background

On a park-by-park basis, superintendents may implement plans that include the reduction or elimination of the sale of disposable water bottles. The decision to implement such a plan should be made in conjunction with park partners and concessioners and should follow a feasibility determination that includes taking visitor expectations, park infrastructure needs, concessioner and park partner financial impacts, safety, public education and awareness and other factors into account. Superintendents will be responsible for determining the timeframe for implementing a plan, but Parks may choose to be interested in including a disposable water bottle ban as a term of a new concession contract, or concessioners may also propose to discontinue the sale of disposable water bottles as a part of a successful proposal. Provided that parks have completed a full assessment that takes into account the visitor expectations, park infrastructure needs, concession financial impacts, public education and awareness and other factors, they may implement such programs as terms under their new concession contracts.

Comment [TBC8]: Parks should be allowed to implement a ban if they have the support and the infrastructure in place – not just in new concessions contracts.

The Service will integrate this disposable water bottle alternative strategy into the Green Parks Plan. The Service will monitor the success of park programs as parks implement them they are implemented, this will include monitoring including reductions in environmental impacts, including such as global warming greenhouse gas generation and waste reduction, visitor participation and satisfaction, and concessioner financial impact. The Service also will continue to reach out to producers and suppliers and the scientific community to gather information on environmental impacts, new technologies, and industry best practices and may help pilot new ideas where appropriate. The Service will revisit disposable water bottle alternatives strategy periodically based on this data to determine whether to change the update this policy periodically based on the data gathered and changing technology and product availability.

**Further Information**

A variety of tools and resources have been collected that can assist parks in putting together a program to provide disposable water bottle alternatives. For additional information, please contact Kurt Rausch, Contract Management Team Leader in the Commercial Services Program at 202-513-7202 or [Kurt\\_Rausch@nps.gov](mailto:Kurt_Rausch@nps.gov) or Shawn Norton, Branch Chief, Sustainability Branch in the Park Facility Management Division at 202-354.1534 or [Shawn\\_Norton@nps.gov](mailto:Shawn_Norton@nps.gov).