



Thomas A. Schatz
President

March 2, 2016

The Honorable Sally Jewell
Secretary of the Interior
1849 C Street, N.W.
Mail Stop 7328
Washington, D.C. 20240

Dear Madame Secretary,

Citizens Against Government Waste (CAGW) is a private, nonprofit, nonpartisan organization dedicated to educating the American public about waste, mismanagement, and inefficiency in government. In an effort to obtain full transparency and disclosure in regard to a National Park Service (NPS) policy memorandum concerning bottled water, I am writing to make a request under the Freedom of Information Act (FOIA).

On December 14, 2011, National Park Service Director Jonathan Jarvis issued policy memorandum 11-03 (attached) to NPS Regional Directors concerning the recycling and reduction of disposable plastic bottles in the parks. The memorandum stated that sustainability is a signature effort for the NPS and is at the heart of its Green Parks Plan. The policy would allow park superintendents to halt the sale of bottled water if they, “(1) complete a rigorous impact analysis including an assessment of the effects on visitor health and safety, (2) submit a request in writing to their regional director, and (3) receive approval of the regional director.”

In addition to the requirements to implement a ban on selling water in disposable bottles, the policy memorandum also stated the NPS would monitor its park and service wide environmental impact, including visitor welfare and the effects on concessioners and cooperating associations. The memorandum also stated “the disposable water bottle alternatives strategy will be revisited periodically based on these data to determine if a change in the strategy is desirable or necessary.”

I am requesting that copies of documents, correspondence, or any other material relating to the following to be provided to CAGW:

- The number, name, and location of the parks that have adopted the disposable bottled water sales ban. The NPS website, news reports, and testimony have provided inconsistent numbers. For example, a NPS website page, “The Plastic Water Bottle Reduction in National Parks,” provides two numbers: 19 national parks have stopped or 18 parks have stopped or intend to stop the sale of water bottles. On December 2, 2015, NPS Director Jarvis testified before the House Natural Resources Subcommittee on Federal Lands that there are “about 20 parks.” On December 17, 2015, *The Washington Post* reported, “As of this week, 22 parks have banned sales ...”

1301 Pennsylvania Avenue, N.W.
Suite 1075
Washington, D.C. 20004
202-467-5300

- Please provide all written analyses that were submitted to regional directors on the 14 factors for each of the parks that currently ban the sale of bottled water. The NPS policy memorandum stated that where it was appropriate to institute a ban on the sale of water in disposable bottles, superintendents could request approval from their regional director by analyzing and addressing 14 factors in writing. These factors can be found under the “Elimination” category in the policy memorandum.
- For each of the parks that currently ban the sale of water in disposable plastic bottles, please provide the annual evaluations for the following:
 - Records of all bottled beverage waste two years prior to an individual park’s ban on the sale of bottled water and since banning the sale of disposable bottled water went into effect, by weight and, if available, by type (plastic, glass, aluminum, etc.);
 - Records on plastic disposable bottles being recycled, by weight, two years prior to an individual park’s ban went into effect and since it went into effect;
 - Infrastructure costs and funding source(s) for all of the filling stations in each park that are currently operational since the ban went into effect; and
 - Contractual costs of filling stations in each park, including utilities and regular public health testing since they became operational.
- Please provide the following information for the parks that have banned the sale of water in disposable plastic bottles for the period of January 1, 2007 to December 31, 2015 (eight years):
 - The number of people who have visited the parks on a daily basis. Please provide data by month for each year for each park. This tally would include information for day visitors and visitors who have utilized overnight stay permits or stayed at the park’s hotels.
 - All concessioner or vendor sales data for all beverages by unit counts and price by SKU that is shared with the NPS.
 - All concessioner or vendor reusable bottle sales data by unit counts and price by SKU that is shared with the NPS.

Since CAGW is a nonprofit public interest organization, I would like to request a waiver of search and duplication fees associated with this request for information.

Thank you for your assistance. If you have any questions regarding this specific request, please contact CAGW Director for Health and Science Policy Elizabeth Wright at (202) 467-5300.

Sincerely,



Thomas A. Schatz
President