



Thomas A. Schatz, *President*
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cagw.org

November 21, 2016

Ms. Charis Wilson, PhD, CRM
NPS FOIA Officer
12795 W. Alameda Parkway
PO Box 25287
Denver, CO 80225-0287

Dear Ms. Wilson,

This letter is in regard to the March 2, 2016, Freedom of Information Act (FOIA) request by Citizens Against Government Waste (CAGW) regarding the National Park Service's (NPS) Policy Memorandum 11-03 that was released on December 14, 2011. The memorandum allows parks on an individual basis to ban the sale of bottled water "following an extensive review and with the prior approval of the regional director." The FOIA tracking number is NPS-2016-00383.

We are acknowledging receipt of the cache of documents sent to us on September 29, 2016. As you may recall, CAGW has been trying to determine whether the ban on the sale of bottled water has reduced the amount of plastic waste in the parks. Unfortunately, the recent group of documents provided to CAGW has little, vague or no information that would demonstrate or enable CAGW to determine if the parks are conducting yearly analyses on the effects of their respective bottled-water bans. As you know, "a system for annual evaluation of the program, including public response, visitor satisfaction, buying behavior, public safety, and plastic collection rates" is required in the 2011 policy memorandum.

In the group of documents provided to us there are copies of Zion National Park's solid waste recycling tracking numbers. While it is the most comprehensive information provided to us in this latest collection, it is still lacking.

Since 2009, Zion has banned the sale of water in plastic bottles. Zion's concessioner Xanterra produces an "Annual Waste Stream Inventory" and copies of these analyses cover the years 2009 to 2015. The reports showed that from 2009 to 2012, recycled plastic was collected in amounts of 6,612 pounds, 12,036 pounds, 15,198 pounds, and 12,791 pounds, respectively. There are no plastic recycling tracking amounts reported for 2013, 2014, and 2015. We have concerns and questions as a result of this data:

- The ban on the sale of water in plastic bottles was intended to reduce plastic waste. Does Xanterra break down the type of plastic that is being recycled? If Xanterra does not break down the type of plastic being recycled, how can it be determined if the ban on the sale of bottle water to reduce plastic waste has been successful? For example, are park visitors turning to other beverages that are being sold in plastic bottles, such as juices and energy drinks, instead of water? Are visitors bringing into the park their own bottled water? If anything, the tracking numbers indicate plastic waste has increased on average since the ban was put into place.

- Xanterra notes in its survey under the header “Solid Waste Recycled/Donated” that in years 2009-2015, the contractor “recycled cardboard, aluminum, and steel/tin, paper, plastic and glass.” Listed in the 2009, 2010, 2011, and 2012 annual waste stream recycling tracking numbers, plastic poundage was reported for each year. However, in the contractor’s annual waste stream tracking numbers for years 2013, 2014, and 2015, there is no plastic poundage reported. Please explain why this information is missing.

In our July 5, 2016, letter we requested copies of any response provided to Congress as a follow-up to Director Jarvis' testimony before the House Committee on Oversight and Government Reform on June 14, 2016. We are still waiting for a copy of that response.

At this time we do not consider this FOIA request closed. We reserve our right to call for the release of additional information regarding the ban of the sale of bottled water and its effects on reducing plastic waste in the national parks.

Sincerely,

A handwritten signature in black ink that reads "Thomas Schatz". The signature is written in a cursive, slightly slanted style.

Attachments:

Xanterra at Zion Lodge Solid Waste to Landfill Reports; 2010 and 2014