

December 15, 2025

The Honorable Secretary Burgum
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Jessica Bowron
National Park Service
1849 C Street NW
Washington, DC 20240

Dear Secretary Burgum and Acting Director Bowron:

On behalf of the undersigned organizations representing the group travel, motorcoach, student travel, international inbound, and broader U.S. tourism industries, we write to commend your leadership in modernizing operations to make our national parks more accessible and efficient, while pursuing new revenue streams that support the maintenance of our public lands. However, we remain deeply concerned about the proposal to implement a new per-passenger international visitor fee under the National Park Service (NPS) Commercial Use Authorization (CUA) program. This change would negatively impact CUA permit holders—U.S. businesses and American jobs—and we urge you to consider delaying implementation of the new fee policies to allow time to collaborate with industry partners on a more workable solution.

Implementing a new CUA fee structure without significant lead time—particularly for the 2026 travel season, for which trips were sold 12–18 months ago—would force companies to absorb the full amount of any new fees, and in the long term create substantial operational, administrative, and economic challenges across the group-travel industry. Because tours are contracted, marketed, and priced well over a year in advance, sudden mid-cycle fee changes would undermine existing agreements, destabilize budgets, and reduce the ability of operators to continue offering national-park itineraries to domestic and international travelers.

Most commercial motorcoach groups visiting national parks consist of both domestic and international travelers. Except for student and youth groups, it is extremely uncommon for tour groups to be composed solely of U.S. or international passengers. These requirements would impose substantial new administrative burdens on both operators and park personnel, particularly for small and mid-sized companies that lack dedicated compliance staff.

The economic effects on gateway communities would be substantial. These areas rely heavily on international group travel to sustain hotels, restaurants, retailers, attractions, and seasonal jobs. Because international visitors stay longer, spend more, and generate broader economic benefits than domestic travelers, even small declines in group volume can have an outsized impact. A

new per-passenger fee would likely reduce international group visits, lower demand for lodging and dining, shorten stays, and weaken tourism-based tax revenue—impacts felt most sharply in rural communities that depend almost entirely on park visitation to support their local economies.

The broader U.S. tourism industry would face similar challenges. Group travel via motorcoach alone generated an estimated 37.6 billion passenger miles in 2024, with direct traveler spending totaling \$69.8 billion across transportation, accommodations, food, and beverages. That spending produced a total economic impact of \$158 billion nationwide, supporting 890,031 jobs and generating \$27.7 billion in tax revenue. Introducing a new per-passenger international fee risks depressing this vital sector at a time when CUA tour operators report international visitor bookings are already down 30 percent. Adding costs targeted specifically at international travelers could accelerate this decline and weaken the competitiveness of U.S. nature-based tourism compared with destinations such as Canada, Australia, and the EU.

For motorcoach and group-travel operators, the impacts would be particularly severe. These companies operate on thin margins and plan trips years in advance; many 2026 itineraries were already sold in 2025, leaving no ability to adjust pricing. A sudden fee increase would impose unexpected costs, create financial instability, and could force operators to cancel departures or drop national-park visits entirely—ultimately reducing public access to these iconic landscapes for both domestic and international travelers.

In light of these concerns, we urge the Department of the Interior (DOI) and the NPS to pursue an alternative approach through CUA modernization. We specifically request that DOI delay the January 1, 2026, implementation of new international fees on CUA passengers to allow time to develop a more workable solution. A predictable, transparent commercial vehicle fee structure implemented over a reasonable timeline would support park maintenance and conservation while aligning with the operational realities of the group-travel industry, protecting the economic health of gateway communities, and preserving the competitiveness of U.S. tourism.

We appreciate your leadership and would welcome the opportunity to discuss these issues further.

Respectfully,

Adventure Travel Trade Association
American Bus Association
International Inbound Travel Association
National Tour Association
Student & Youth Travel Association
United Motorcoach Association
U.S. Travel Association
United States Tour Operators Association