



United States Department of the Interior ^{Laura}

NATIONAL PARK SERVICE
Pecos National Historical Park
P.O. Box 418
Pecos, NM 87552



In reply to:

NOV 05 2013

Memorandum

To: Acting Regional Director, Intermountain Region
Through: Acting Deputy Regional Director, Intermountain Region
From: Superintendent, Pecos National Historical Park /s/
Subject: Request for Approval to Eliminate the Sale of Water in Disposable Plastic Bottles

We have modified the drinking fountain in the E.E. Fogelson Visitor Center to enable users to fill reusable water bottles. The park has worked closely with Western National Parks Association (the vendor of bottled water) to facilitate a smooth transition from selling disposable plastic bottles to producing and marketing reusable bottles only.

In compliance with the policy memorandum issued by the Director on December 14, 2011, an attached analysis on potential impacts of the program to switch from sales of disposable bottled water to reusable bottles seeks your approval to continue its implementation.

Recommend Concurrence:

Mary Risser

Mary Risser, Acting Deputy Regional Director

Concur:

Laura E. Joss

Laura E. Joss, Acting Regional Director

11/5/13

Pecos National Historical Park

Analysis of potential impacts from switching to the sale of reusable water bottles from disposable bottles.

1. Elimination of waste and the overall pros/cons to park operations.

The Pecos National Historical Park (PECO) could significantly eliminate overall waste and aid in the park's recycling program. Of the 1.79 tons of material recycled by the park in Fiscal Year 2012, approximately 25% was comprised of disposable plastic bottled water or other plastic containers. This is especially true during the summer months when park visitation is at its peak and when the overwhelming majority of bottles are sold. Eliminating plastic water bottles would certainly reduce the park's overall waste and create a more sustainable solid waste/recycle management plan.

Pros:

- Although the park has undertaken an aggressive approach to recycling, plastic bottles inevitably still end up at the landfill. The percentage of bottles getting to this point would be greatly reduced with the discontinuation of bottled water sales and the adoption of a reusable water bottle policy.
- We can expect to see that the average visitor who buys multiple bottles of water will alternatively purchase a reusable bottle. This bottle can be filled multiple times and over a brief period (even after the visitor leaves the park) will garner the visitor savings. Visitors may be inclined to spend funds on other items from the association.
- Reduction of Green House Gases (GHG's) and savings of resources used during transport and process of waste and recyclables.
- Reduction in time and labor in handling waste and recyclables by Facility Management staff.
- Reduction in litter associated with disposable bottles.
- Protection of wildlife, birds, rodents, and mammals are often enticed to plastic bottles perhaps believing they contain either food or water whereby they will inadvertently swallow pieces of the container. It is well documented that these pieces can cause wildlife to choke and create blockages in the digestive tract when ingested.
- Reduce the release of toxic chemicals that plastics are known to contain, which have a negative impact on wildlife.

Cons:

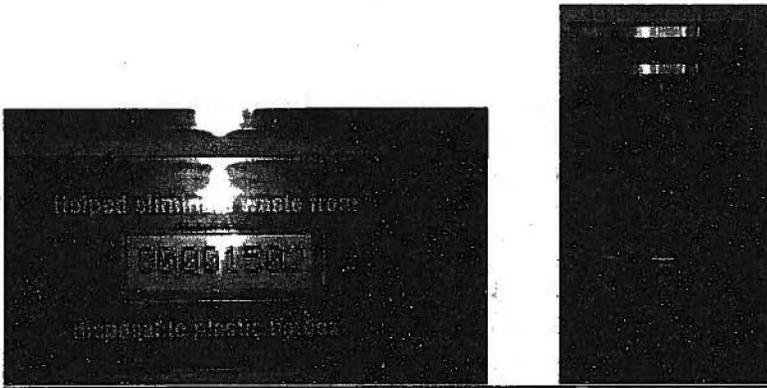
- Bottled water has a high profit margin for the Western National Parks Association (WNPA). If sales of reusable bottles do not come into line with the profits of bottle water, WNPA

would incur a significant financial loss (see #6 for analysis of sales). Nevertheless, WNPA is supporting the park in its elimination of bottled water.

- Risk of visitor dehydration. (Widespread use of bottled water has occurred within a relatively short time and historical accounts do not show this to be a significant problem. These concerns were well managed before the advent of bottled water by placing drinking fountains at strategic locations. In addition, reasonably priced reusable bottles would offer a way for visitors to stay hydrated at a relatively low cost.)

2. Infrastructure costs and funding source(s) for filling stations

PECO has replaced the drinking fountain in the EE Fogelson Visitor Center with an Elkay EZH₂O refillable station and its use has been increasing since its installment. The current number on refills at this time is 1502 bottles.



The cost and installation of the water station was paid for from park operational funds. Total cost for unit and installation amounted to \$2,000. Cost includes labor for the installation and modification.

3. Contractual implications on concessioners, including considerations of new leaseholder surrender interest or possessory interest

Bottled water is exclusively sold by PECO's cooperating association WNPA. The association operates under an agreement with the NPS; therefore, there is no contract or possessory interest for consideration.

4. Operational cost of filling station, utilities, and public health testing.

It is estimated that the annual cost of \$70 would maintain and operate the filling station. The estimation includes the purchase and installation of a new filter. Utility costs should prove to be insignificant as the park maintains and operates its own well. In addition, water testing by park staff is already a core of park operations.

5. Providing a reasonable alternative, the cost and availability of BPA-free reusable containers.

WNPA is offering reusable bottles for visitors to purchase. Currently, there is a \$2.99 28 oz Jr. Ranger bottle and a \$12.00 32 oz Nal-gene bottle that carries the park logo. Both bottles are BPA-free, and sales of these items have steadily increased since their introduction. In addition, evidence of their use is seen above in the number of refills at the fountain. Currently 16.9 oz disposable bottles

of water with the park logo are priced at \$1.99. It would seem apparent that when visitors are given alternatives, at a reasonable price, the choice between disposable and reusable containers could prove to be negligible in terms of sales. This trend is more likely to carry on as WNPA continues to look at reasonable alternatives.

6. Impact to cooperating association of revenue derived from sale of bottled water

On average WNPA sales of disposable water bottles here at PECO are 950 bottles. Sales of bottled water are at a high point during the summer season when, for example, 593 bottles were sold in the third quarter of 2013. Based on the information provided by WNPA on sales of water (over the last 11 quarters) here at PECO, it can be expected that any loss in gross sales as a result of implementation of this program will be inconsequential. The expectation is contingent on the fact that sales of reusable bottles will continue to increase as the sale of disposable bottles is eliminated.

7. Availability of water by concessioner with food operations

PECO does not have a concessioner and/or food operations.

8. Educating visitors to the park to bring along their own water bottle to the park.

The use of the already installed water filling station indicates the public's willingness to adopt a program of filling reusable bottles for water. The park will continue to facilitate this trend by providing relevant information to the public on how our program to eliminate disposable bottles is progressing and when it is fully implemented. This will give the visitor full notification of suggested items visitors should have prior to visiting the park. Park staff will disseminate this information to the public through printed material, website, social media, and orally. All staff will be notified of the implementation that they may readily share it with visitors.

9. Results of consultation with NPS Public Health Office

Information is unavailable at the drafting of this report.

10. Sign plan enabling visitors to find filling station with ease

There is currently no signage directing visitors to the filling station. However, the filling station is strategically located within the visitor center and is found with little or no direction. If necessary, staff is always available to assist visitors in locating the station.

11. Safety considerations for visitors who may not carry enough water or drink water from surface water sources which carry a potential exposure to disease

Visitors are never more than a mile from either the newly installed filling station in the visitor center or a traditional drinking fountain at the comfort station located along the trail. Visitors using other trails are advised orally and in site bulletins about the lack of drinking water. Still, they are never more than a mile from their vehicle. The practice of notification in these areas will continue and increased through proper signage if it is deemed necessary. Because of the aridity in the area, it is rare to find surface water along the trail and the possibility of exposure to disease from such a source is limited.

12. A system for annual evaluation of the program, including public response, visitor satisfaction, purchasing behavior, public safety, and plastic collection rates

Park management will conduct an annual evaluation of the program by analyzing data collected through:

- Visitor satisfaction/public response collected from comment forms, annual satisfaction survey, and log of complaints/compliments made directly to staff in the visitor center.
- Consultations with the safety officer and issues related to water availability.
- WNPA will continue to analyze sale patterns.

13. Results of consultations with concessioners and cooperating association

Consultations with WNPA staff here at PECO have been continuous from initial discussions as to the potentiality of eliminating disposable water bottles. These consultations have led to the sale of reusable bottles that are acceptable to both parties. As a result, an agreement was reached on the timeline for the eventual elimination of disposable bottled water sales. Throughout the process, both parties have been committed to finding a common vision and have worked together in implementing a viable program.

14. Timeline of phase in period

The phase in period of action is well under way, and the park awaits the approval by the NPS-IMRO for continued implementation. Reusable bottles are on the shelf and the drinking station has already been installed. It is expected that full implementation of the program will show an overall benefit to the public, park, and cooperating association. WNPA has approximately 273 bottles of water on hand at the time of this report. Disposable bottled water sales are expected to cease when the inventory has been exhausted and the approval of the program.