TALKING POINTS: Concerns Regarding the International Visitor/Nonresident Fee Plan

1. **Request for DOI/NPS to Delay Implementation on Nonresident Group Tour Fee and Engage with Industry for Viable Solutions**
   - Although clear guidance on how the surcharge will apply to group tours, RBCT CUA permits, and non-commercial entry has not yet been issued, initial responses from the National Park Service have indicated that the $100 non-resident fee applies to every non-resident visitor age 16+ on commercial road-based tours, in addition to the standard commercial tour vehicle fee.
   - We respectfully urge DOI/NPS to **pause implementation on Nonresident Group Tour Fee**, consult the inbound travel industry, and develop a plan that is fair, operationally sound, and protects the economic stability of gateway communities, small businesses, American jobs and the tourism sector.
2. **Group Tours Face Immediate, Unmanageable Impacts**
   - Nearly all **2026 group tours have already been contracted and sold**—many up to two years in advance.
   - Operators **cannot retroactively adjust pricing** to accommodate a **$100 per-person surcharge**, risking cancellations, losses, and broken international contracts.
   - Tour operators **cannot absorb these changes** – a $100 per-person surcharge would create tens of thousands of dollars in unplanned costs for a single departure series; and they **cannot pass the cost on as operators are legally obligated to deliver itineraries** at contracted prices and cannot retroactively raise rates.
   - Unclear application of the surcharge to **RBCT CUA group tours** is creating immediate operational paralysis.
   - Without clear guidance, operators cannot plan itineraries, set pricing, or communicate confidently with overseas partners.
3. **International Visitation Is Already Declining**
   - Overseas arrivals to the U.S. are down nearly **3% year-to-date**.
   - Canadian visitation is down **25%**, representing nearly 4 million fewer trips.
   - Key markets remain depressed: China down 65%, Japan 53%, Brazil 24%.

- Adding another fee on international visitors will deepen this decline at a moment when global competitors are aggressively courting these same travelers.

4. **The Economic Stakes Are High**
    - International visitors spent **$256 billion** in the U.S. in 2023.
    - The U.S. economy loses **$1.8 billion for every 1% decline** in international visitor spending.
    - Continuing declines could mean **$21 billion in lost spending in 2025**—harmful to both national and local economies.

5. **Gateway Communities Will Be Hurt First**
    - International visitors often comprise **30–50% of offseason visitation** in gateway communities.
    - Reduced visitation will mean:
        - Lower local tax revenue
        - Fewer jobs
        - Reduced shoulder-season demand
        - Increased business volatility for restaurants, hotels, outfitters, and attractions

6. **Operational Challenges for Both NPS and Operators**
    - Many entry systems currently **cannot distinguish international from domestic visitors**.
    - Parks lack the staff to administer a per-person surcharge consistently.
    - This new fee will create crowding, confusion, and delays at entrances—especially during the 2026 World Cup year.

7. **The Industry Supports Sustainable Funding**
    - IITA and its members have long supported reasonable increases to park fees.
    - However, a **surcharge targeting only international visitors** is inequitable, damaging to U.S. competitiveness, and unnecessary.
    - The inbound travel industry is prepared to offer **practical solutions** that can help NPS meet revenue goals without undermining international demand.