



South Dakota Campground Owners Association (SDCOA)

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Executive Director, Mary Arlington

February 26, 2019

RE: SD SB 178 Palisades State Park & Emergency Declaration

I'm writing to you today on behalf of the South Dakota Campground Owners Association (SSDCOA). We represent the nearly 200 privately owned campgrounds in South Dakota. Most of our campgrounds are family owned small businesses.

SB 178 would make an appropriation to the Department of Game, Fish and Parks to fund certain improvements to Palisades State Park and to declare an emergency. SDCOA is concerned that the legislation contains no limitations on what improvements can be made by GF&P.

This could result in taxpayer dollars being used to unfairly compete with private campgrounds. We have seen Custer State Park add many cabins and upgraded RV sites in their campgrounds. GF&P has remarked in past comments that they would plan on similar renovations at other locations given the chance and that they would charge lower camping rates for these sites than is common practice in the private sector.

Campsites that are "primitive or rustic sites" don't have electric, water and sewer hookups. Private campground owners consider these types of campsites to be useful for campers who prefer to "rough it" in Federal, State or other public parks. Our owners provide full service campsites with full hook ups to water, sewer, electric and other amenities. There isn't any real unfair direct competition here.

When upgraded facilities are added to public campgrounds that can charge lower rates due to taxpayer subsidies and entrance fees, not only does that unfairly compete with our campgrounds, it also causes consumers to question the fees that private campgrounds must charge to operate their properties. We don't have taxpayer assistance to lower our rates. Thus we directly lose business and suffer downward pressure on our ability to charge rates sufficient to run our businesses. Almost all private campgrounds in South Dakota are small businesses that operate on very limited margins.

In addition to these advantages, State campgrounds are "in the Park" which makes them more desirable than others outside of the park boundaries. We can't compete with this fact regardless of other factors inherently found with Government run parks.

The State should not be taking jobs and consumers from private small businesses to State run campgrounds that can unfairly compete due to their taxpayer subsidy and entrance fees. There is no evidence that capacity of private campgrounds to meet the needs of tourists both now and in the future is lacking.

Taxpayer dollars should not be used to create a State run competitor. This is totally unfair and anathema to our free market economy.

Please add language to SB 178 to limit the ability of GF&P to create full service camping and cabin facilities at Palisades State Park. In the alternative, we would ask you to oppose this legislation.

Any enabling legislation should include a prohibition on upgraded campground facilities beyond which are commonly referred to as "semi-developed campgrounds" defined in the National Fire Protection Association NFPA 1194: Standard for Recreational Vehicle Parks and Campgrounds.

Thank you for your consideration and I hope we can count on your support.

Respectfully,



Mary Arlington, CPO, OHC
Executive Director

cc: SDCOA Board of Directors
J Sims, Sr. Dir of State Relations & Program Advocacy, National Assn of RV Parks & Campgrounds