



October 6, 2025

Jason Gibson, Acting Associate Director for Interpretation, Education, and Volunteers
National Park Service, U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Submitted via regulations.gov

**RE: Comments in Response to Request for Information: Improving Visitor Services
in National Parks, Docket No. NPS-2025-0037**

Dear Acting Associate Director Gibson:

The Center for Biological Diversity, on behalf of itself and its 1.7 million members and supporters, submits these comments in response to the National Park Service's Request for Information: Improving Visitor Services in National Parks, Docket No. NPS-2025-0037, 90 FR 43472 (September 9, 2025).¹ The Center for Biological Diversity is a national 501(c)(3) nonprofit conservation organization dedicated to the protection of endangered species and wild places. Our recommendations to improve visitor services include updating NPS's food standards and guidelines to increase wildlife-friendly foods. We believe these recommendations will help NPS provide the best possible visitor services experiences while supporting the needs of the natural environment that it is dedicated to protecting.

I. Increase Healthy and Nature-Friendly Menus in NPS Food Services by Updating the Healthy Food Standards and Sustainable Food Guidelines

In the interest of improving its visitor services, we request that the National Parks Service (NPS) update its [Healthy Food Standards and Sustainable Food Guidelines](#) ("Healthy Food Standards"),² last updated in 2017, to increase the availability of healthy and nature-friendly food across its more than 500 contract concessioners and over 400 park locations. **Specifically, we recommend that the Healthy Food Standards be updated to mandate the inclusion of 1) at least one plant-based entrée at every meal/on every menu and 2) plant-based milk and creamer options at every location where dairy milk and creamers are offered.** This change will help NPS further its mission to "preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations,"³ both because it will meet the health and dietary needs of all visitors and because plant-forward diets are better for wildlife and the natural environment.

¹ Improving Visitor Services in National Parks, 90 FR 43472 (proposed September 9, 2025).

<https://www.federalregister.gov/documents/2025/09/09/2025-17293/improving-visitor-services-in-national-parks>

² National Park Service. (2012/2017). *Healthy food standards and sustainable food guidelines*.

<https://www.nps.gov/subjects/concessions/upload/Healthy-Food-Standards-and-Sustainable-Food-Guidelines.pdf>

³ National Park Service. (n.d.). *About us*. <https://www.nps.gov/aboutus/index.htm>

The Healthy Food Standards were first issued by NPS in 2012 to follow the Department of Health and Human Service's (HHS) Health and Sustainability Guidelines for Federal Concessions and Vending Operations⁴ and the 2015-2020 Dietary Guidelines for Americans. The 2017 version of the Healthy Food Standards, which applies to all new NPS food concession contracts since 2016, mandates certain minimum requirements for the healthfulness of food concessions, including providing fruits and vegetables, low-fat options, and no added sugar or artificial trans fats; it also requires that food signage, labeling, placement, nutritional information, and marketing supports and features healthier options.⁵ Beyond this, it provides recommendations for increasing the environmental sustainability of food options, including sourcing organic, seasonal, fair trade, and local ingredients.⁶

a. Nature-Friendly Foods Are Good for People and National Parks

Enhancing menus across NPS locations will better meet the needs and preferences of all visitors, contributing to overall improved visitor satisfaction. Visitors with restricted diets, whether due to allergies, health reasons, religion, or other, can often find their dietary needs met through plant-based meals, which exclude major allergens such as dairy, shellfish, and eggs, and by default tend to be kosher and halal. Visitors who follow entirely plant-based diets should also be able to consume meals at NPS facilities. By including plant-based options at every meal, NPS can ensure its services are as comprehensively accessible to all visitors as possible, guaranteeing they will continue to visit the country's incredible national parks.

Furthermore, plant foods, particularly in their whole forms, tend to be most nutritious,⁷ so making them more widely available will contribute to the health of all visitors. NPS clearly agreed with this when it created its latest Healthy Food Standards, as the standards emphasize increasing the availability of fruits, vegetables, and whole grains to achieve high nutritional value.⁸ Many prominent health organizations, including the American Cancer Society,⁹ American College of Lifestyle Medicine,¹⁰ and American Heart Association,¹¹ recommend that the healthiest diets are those based primarily around plant foods and lower in processed and red

⁴ Department of Health and Human Services and General Services Administration. (2011). *Health and sustainability guidelines for federal concessions and vending operations*. <https://msdh.ms.gov/page/resources/6656.pdf>

⁵ National Parks Service. (2012/2017). *Healthy food standards and sustainable food guidelines*. <https://www.nps.gov/subjects/concessions/upload/Healthy-Food-Standards-and-Sustainable-Food-Guidelines.pdf>

⁶ *Ibid.*

⁷ Willet, W., Rockstrom, J., Loken, B., Springmann, M., Lang, Tim, Vermeulen, S., et al. (2019). Food in the Anthropocene: The EAT-Lancet Commission on healthy diets from sustainable food systems. *The Lancet Commissions*, 393(10170), 447-492. [https://doi.org/10.1016/S0140-6736\(18\)31788-4](https://doi.org/10.1016/S0140-6736(18)31788-4)

⁸ National Parks Service. (2012/2017). *Healthy food standards and sustainable food guidelines*. <https://www.nps.gov/subjects/concessions/upload/Healthy-Food-Standards-and-Sustainable-Food-Guidelines.pdf>

⁹ Rock CL, Thomson C, Gansler T, Gapstur SM, McCullough ML, Patel AV, Andrews KS, Bandera EV, Spees CK, Robien K, et al. (2020). American Cancer Society guideline for diet and physical activity for cancer prevention. *CA Cancer J Clin.*, 70(4), 245–271. <https://www.doi.org/10.3322/caac.21591>

¹⁰ Landry MJ, Ward CP. (2024). Health Benefits of a Plant-Based Dietary Pattern and Implementation in Healthcare and Clinical Practice. *American Journal of Lifestyle Medicine*, 18(5), 657-665. <https://www.doi.org/10.1177/15598276241237766>

¹¹ American Heart Association. (2023, December 20). *How does Plant-Forward (Plant-Based) Eating Benefit Your Health?* <https://www.heart.org/en/healthy-living/healthy-eating/eat-smart/nutrition-basics/how-does-plant-forward-eating-benefit-your-health>

meat. Reducing meat consumption decreases the risk of heart disease, stroke, obesity, high blood pressure, high cholesterol, and type 2 diabetes.¹²

Plant foods are also the most nature-friendly. Many studies confirm that a plant-forward diet, in addition to being the healthiest, is the most sustainable in terms of fewer GHG emissions,¹³ reduced land and water use,¹⁴ and other general environmental impacts.^{15 16} Meat- and dairy-heavy menus contribute to American overconsumption of unhealthy foods and are driving biodiversity loss, freshwater usage, deforestation, and habitat losses seen around the world, due to its outsized contributions to pollution and land consumption.^{17 18 19} Because of this, many prominent scientists and organizations have argued that sustainable, plant-forward food systems are essential to protecting biodiversity.²⁰ It strongly aligns with NPS's mission to "preserve unimpaired" the natural resources in U.S. national parks by offering foods that support wildlife conservation.

b. Wildlife-Friendly Menus Align with NPS's Existing Programs and Policies

In 2011, NPS launched Healthy Parks Healthy People,²¹ a global program to "advance the role of parks and public lands as powerful health resources serving as a catalyst for bringing about lasting change in Americans' lifestyle choices and their relationship with nature and the outdoors."²² In its 2018-2023 strategic plan, one of the program's arenas for collaboration is "Environmental Sustainability: Promoting human and environmental health through education and implementation of sustainable practices."²³ The Healthy and Sustainable Food Program, with its Healthy Food Standards and Sustainable Food Guidelines, arose from this initiative,

¹² *Ibid.*

¹³ Wijerathna-Yapa, A., & Pathirana, R. (2022). Sustainable agro-food systems for addressing climate change and food security. *Agriculture*, 12(10), 1554. <https://doi.org/10.3390/agriculture12101554>

¹⁴ Jennings, R., Henderson, A. D., Phelps, A., Janda, K. M., & van den Berg, A. E. (2023). Five U.S. dietary patterns and their relationship to land use, water use, and greenhouse gas emissions: Implications for future food security. *Nutrients*, 15(1), 215. <https://doi.org/10.3390/nu15010215>

¹⁵ Harvard T.H. Chan School of Public Health. (2024, June 10). *Planetary Health Diet associated with lower risk of premature death, lower environmental impact*. ScienceDaily. www.sciencedaily.com/releases/2024/06/240610140239.htm

¹⁶ Chai, B.C., van der Voort, J.R., Grofelnik, K., Eliasdottir, H.G., Kloss, I., & Perez-Cueto, F.J.A. (2019). Which diet has the least environmental impact on our planet? A systematic review of vegan, vegetarian and omnivorous diets. *Sustainability*, 11, 4110. <https://doi.org/10.3390/su11154110>

¹⁷ Tirado-von der Pahlen, C. (2017). *Sustainable diets for healthy people and a healthy planet*. United Nations System Standing Committee on Nutrition. <https://www.unscn.org/uploads/web/news/document/Climate-Nutrition-Paper-EN-WEB.pdf>

¹⁸ Roeder, A. (2019, November 25). *Eat greener: A call for sustainability in U.S. dietary guidelines*. Harvard T.H. Chan School of Public Health. <https://www.hsph.harvard.edu/news/features/eat-greener-sustainability-dietary-guidelines/>

¹⁹ FAO. (2021, June 11). *COP26: Agricultural expansion drives almost 90 percent of global deforestation*. <https://www.fao.org/newsroom/detail/cop26-agricultural-expansion-drives-almost-90-percent-of-global-deforestation/en>

²⁰ UN Environment Programme. (2021, February 3). *Our global food system is the primary driver of biodiversity loss*. <https://www.unep.org/news-and-stories/press-release/our-global-food-system-primary-driver-biodiversity-loss>

²¹ National Park Service. (n.d.). *Healthy parks healthy people*.

<https://www.nps.gov/subjects/healthandsafety/healthy-parks-healthy-people.htm>

²² National Park Service. (2018). *Healthy parks healthy people 2018-2023 strategic plan*.

https://www.nps.gov/subjects/healthandsafety/upload/HP2-Strat-Plan-Release-June_2018.pdf

²³ *Ibid.*

promising to “provide healthy, sustainable, and affordable food and beverage options for park visitors.”²⁴ The additional vision, goals, and principles of Healthy Parks Healthy People include:

- “Parks contribute to a healthy, just, and sustainable world.
- “Healthy Parks Healthy People contributes to the health of parks and ecosystems.
- “People are inspired to improve their health in parks.
- “We promote health and wellbeing as an interrelated system linking human health to natural landscapes and all species.
- “We encourage uses that promote the health of all species while avoiding those that impair resources.”²⁵

Improving plant-forward, wildlife-friendly food options in NPS food services will advance such goals and principles because these foods contribute to better health outcomes for visitors and the environment, and promoting this type of diet can illustrate how the health of humans, nature, and other species are connected, particularly at the nexus of the food system.

c. NPS Already Possesses the Infrastructure to Increase Wildlife-Friendly Foods

It appears to us that NPS, its contractors, and its partners have been laying the groundwork to provide more sustainable and wildlife-friendly food services for many years. Xanterra, the largest concession and food services manager in major national parks like Yellowstone, Mount Rushmore, and Grand Canyon, has programs dedicated to this very goal. Xanterra Travel Collection operates the Our Softer Footprint program to reduce its environmental impact,²⁶ which includes its Fresh Forward Sustainable Food Program – a goal to achieve 70% sustainable and local foods at its land-based restaurants.²⁷ In 2015, NPS awarded Yellowstone’s 17 restaurants an Environmental Achievement Award for offering fresh, healthy, sustainable foods; each restaurant offers a vegetarian and vegan option.²⁸ In July 2025, Xanterra Travel Collection made the monumental announcement that it will commit to make at least 50% of its menu entrees plant-based by the end of 2026.²⁹

Various NPS nonprofit partners have also committed to promoting wildlife-friendly and sustainable food options. The Institute at the Golden Gate, a program of the Golden Gate National Parks Conservancy, launched its Food for the Parks Initiative to expand availability of local and sustainable food to visitors and published a report and roadmap to guide concessioners

²⁴ *Ibid.*

²⁵ *Ibid.*

²⁶ Xanterra Travel Collection. (n.d.). *Our softer footprint*. <https://www.xanterra.com/who-we-are/sustainability/>

²⁷ Xanterra Travel Collection. (n.d.). *Fresh forward sustainable food program*.

<https://www.xanterra.com/stories/fresh-forward-sustainable-food-program/>

²⁸ Yellowstone National Park Lodges. (2015, November 12). *Yellowstone’s healthy, sustainable food lauded by National Park Service with 2015 Environmental Achievement Award*.

<https://www.yellowstonenationalparklodges.com/press-releases/yellowstones-healthy-sustainable-food-lauded-by-national-park-service-with-2015-environmental-achievement-award/>

²⁹ Greene, M. (2025, July 1). *National Parks to take a greener path: Half of all menu items to go plant-based by 2026*. Mercy For Animals. <https://mercyforanimals.org/blog/national-parks-take-a-greener-path-half-of-all-menu-items-to-go-plant-based-by-2026/>

to transition to a healthy and sustainable food program.³⁰ The report identified eight notable national parks where sustainable food practices have been successfully implemented.³¹ The National Parks Conservation Association further highlighted and implicitly endorsed these efforts in an article.³² Meanwhile, the National Park Foundation, which has a commitment to reducing its environmental impact through sustainable practices, has partnered with EVOLVE, a plant-based protein brand that's trying to make plant-based protein "more approachable and easier to integrate into everyday active lifestyle."³³

With large contractors like Xanterra already expanding their plant-forward offerings and prominent nonprofit partners leading the way, it should not be difficult for NPS to amend its Healthy Food Standards to require plant-based, wildlife-friendly options.

II. Restore Removed NPS Webpages on Health and Environment Programs and Policies

Finally, while we seek to help advance NPS's existing programs that promote health and nature, we are concerned that information about many such programs and policies has been removed from NPS's website. As of October 2025, webpages on NPS's website about its Climate Friendly Parks Program, its Green Parks Plan, and Climate and Healthy Equity have been removed without explanation. Similarly, HHS's Health and Sustainability Guidelines for Federal Concessions and Vending Operations are no longer available on federal websites, and NPS's Healthy Food Standards and Sustainable Food Guidelines only remain available as a PDF, without an accompanying webpage to describe or introduce them.

It should be noted that, even if those documents were to disappear altogether, federal policy for agencies like NPS should still follow the Food Service Guidelines for Federal Facilities, which aim to provide healthy foods and beverages and follow "environmentally responsible" practices in federal facilities like national parks.³⁴ Therefore, while the fate of certain programs is uncertain, we submit these comments under the assumption that, without a formal rescission, they still legally exist and may be referenced and revisited in the manner we are recommending. **We strongly urge NPS to restore the removed webpages immediately.**

III. Conclusion

³⁰ Golden Gate National Parks Conservancy. (n.d.). *Food in the parks*.

<https://www.parksconservancy.org/conservation/food-parks>

³¹ Institute at the Golden Gate. (n.d.). *Food for the parks*.

https://www.parksconservancy.org/sites/default/files/documents/FoodforParksCaseStudies_report_1.pdf

³² Markle, K. (2013). *Winter 2013: The sustainable spread*. National Parks Conservation Association.

<https://www.npca.org/articles/1081-the-sustainable-spread#:~:text=National%20park%20eateries%20are%20serving%20more%20healthy%2C,can%20already%20taste%20the%20difference.%20Institutional%20food.>

³³ National Park Foundation. (2021, April 16). *EVOLVE plant-based protein renews partnership with National Park Foundation and offers an epic park adventure*. <https://www.nationalparks.org/news-and-updates/press-releases/evolve-plant-based-protein-renews-partnership-with-national-park-foundation-and-offers-an-epic-park-adventure>

³⁴ Food Service Guidelines Federal Workgroup. (2017). *Food service guidelines for federal facilities*. U.S. Department of Health and Human Services. <https://www.cdc.gov/nutrition/php/food-service-guidelines/food-service-guidelines-federal-facilities.html>

In summation, offering healthy and nature-friendly menus would greatly improve NPS's visitor services and can easily be achieved by updating NPS's Healthy Food Standards to require at least one plant-based entrée at every meal/on every menu and plant-based milk and creamer options. This will advance NPS's mission and its Healthy Parks Healthy People initiative and is already well-supported by existing infrastructure and programs across NPS's food services and nonprofit partners.

Respectfully submitted,

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