



Protect America's Climbing

December 18, 2017

National Park Service
Recreation Fee Program
1849 C Street, NW
Mail Stop: 2346 Washington, DC 20240

Submitted via PEPC website: <https://parkplanning.nps.gov/proposedpeakseasonfeerates>

RE: Access Fund comments on NPS Peak Season Fee Rate Proposal

Dear NPS Acting Director Mike Reynolds,

The Access Fund appreciates the opportunity to comment on the NPS Peak Season Fee Rate Proposal (NPS Fee Increase Proposal). We represent over Access Fund 15,000 members as well as 7 million rock climbers nationwide. Interestingly, each of the 17 parks considered for significant fee increases offer recreational climbing opportunities. Some of the parks on the list offer world-class climbing opportunities and serve as a historic backdrop for America's rich climbing legacy. Therefore, the NPS proposal to increase fees at 17 parks is directly related to Access Fund's mission to protect climbing access and conserve the climbing environment. Thank you for your consideration of the following comments.

Access Fund

The Access Fund is a national advocacy organization and accredited land trust whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 15,000 members and 100 local affiliates. The Access Fund currently holds memorandums of understanding with the Bureau of Land Management, National Park Service, and Forest Service¹ to work together regarding how climbing will be managed on federal land. The Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. For more information about the Access Fund, visit www.accessfund.org.

COMMENTS

The Access Fund opposes the proposed fee increases for 17 national parks because we believe fee increases should, 1) be proposed by individual park units instead of the Washington, DC office, 2) thoughtfully consider national park visitors of all socio-economic backgrounds, 3) not be used as

¹http://www.accessfund.org/site/c.tmL5KhNWLrH/b.5000797/k.40E2/Collaboration_with_federal_agencies.htm.

the primary mechanism for solving the maintenance back log issues, and 4) be gradual as to not exceed ~25% increase at any one time.

Access Fund recognizes the need to increase fees in order to keep up with market value and to provide parks with much-needed income. However, we believe that each individual park unit is best suited to understanding their own visitors and to determine fee increase proposals on their own. In the past, Access Fund has supported small fee increases at individual national parks, such as Joshua Tree National Park, where incremental fee increases will help the park and not be prohibitively expensive for the entire spectrum of park visitors. We hold deep respect for the authority of each park unit and do not support this top-down NPS Fee Increase Proposal because it does not consider park-specific needs, visitor-use analyses, local demographics, and the concerns of local, headwater economies. We hope that the Department of Interior will drop this proposal and instead request that individual park units evaluate their fee structure and develop their own fee proposals.

Increasing entrance fees by up to 350% means that many Americans could no longer afford to visit their national parks. The climbing community is growing in diversity, and the Access Fund advocates for all climbers, rich or poor. Therefore, we cannot support a \$75 fee for entering national parks that were designated, in part, “for the enjoyment of future generations.”² The unequivocal popularity of NPS fee free days clearly indicates the importance of providing opportunities for Americans, of all socioeconomic backgrounds, to access to our national park system. Therefore Access Fund also opposes the reduction of fee free days from ten in 2017 to four in 2018. Fee free days provide an important opportunity for first-time park visitors to become invested in national parks and hopefully become lifelong national park supporters without significant and restrictive economic costs.

Instead of burdening national park visitors with exorbitant fees during peak seasons in order to cover maintenance back logs, Access Fund encourages Congress to legislate appropriate long-term funding for the National Park Service (passing the [National Park Service Legacy Act](#) would be a good start) and other land management agencies. Passing the buck to park visitors in such a dramatic way isn't the answer. National Parks are owned by all of us, and all Americans deserve equal access. Access Fund supports appropriate funding for the National Park Service and commits to being a dependable partner for advocating for an increased NPS budget.

And finally, Access Fund believes that hefty (~300%) fee increases are not fair to the American public and the National Park Service because fee increases for public lands access should be gradual. Incremental fee increases allow for assessment and adjustments in order to optimize income streams for each national park unit while maintaining accessibility to park visitors. We support a metered approach to fee increases rather than drastic, experimental increases to National Park entrance fees.

² Act to Establish A National Park Service (Organic Act), 1916

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Access Fund appreciates the opportunity to comment on the NPS Peak Season Fee Rate Proposal. We strongly object to this proposal, but will continue to support NPS and the US public lands system through our stewardship, policy, education and land acquisition programs. Feel free to contact Erik Murdock at erik@accessfund.org with any questions regarding these comments. And thanks again for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Erik Murdock". The signature is written in a cursive, slightly slanted style.

Erik Murdock, Access Fund policy director

cc: Brady Robinson, Access Fund executive director