



Protect America's Climbing



January 24, 2011

Superintendent Paul Anderson
Denali National Park and Preserve
PO Box 9 - Denali Park, AK 99755
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RE: Access Fund, American Alpine Club and American Mountain Guides Association Comments to the Denali National Park and Preserve Mountaineering Fee Increase Proposal

Dear Superintendent Anderson:

On behalf of the Access Fund, American Alpine Club, American Mountain Guides Association, and the American climbing public, we write to comment on the National Park Service's proposal to increase mountaineering fees at Denali National Park and Preserve ("DENA" or the "Park").¹ The Access Fund, American Alpine Club and American Mountain Guides Association (collectively, the "Climbing Organizations") welcome this opportunity to participate in this important decision and provide specific recommendations to the National Park Service (NPS) regarding 1) how to appropriately measure the cost of mountaineering on Denali, 2) ways to improve the scope DENA's mountaineering program, and 3) and the appropriate fee level for mountaineering in this world-class climbing park.

Access Fund, American Alpine Club and American Mountain Guides Association

The Access Fund, American Alpine Club, and American Mountain Guides Association are national climbing advocacy organizations dedicated to climbing access, conservation, advancing the climbing way of life, and advocating for American climbers. The Climbing Organizations each have a long history of working with the National Park Service, including input on the 2006 revision to the NPS Management Policies, comment letters on hundreds of local management plans around the country including Denali National Park, rescue cost-recovery and recreation impact studies, grants, and many thousands of volunteer hours in support education and stewardship projects, field training and climbing management conferences, and congressional advocacy urging full funding for National Park Service operations. We have also long worked collaboratively with the National Park Service at dozens of other national parks around the country on climbing management planning initiatives and stewardship projects. For more about us, see www.accessfund.org, www.americanalpineclub.org, and <http://amga.com>.

¹ <http://www.nps.gov/dena/parknews/mountaineering-use-fee.htm>

GENERAL REMARKS

For 100 years mountaineers have been climbing Denali, and this activity should be viewed as a traditional and appropriate use of the Park. Further, Denali National Park's enabling law directs the NPS to establish park regulations and management policies that are "primarily aimed at the freest use of the park for recreation purposes by the public and for the preservation of animals, birds, and fish and for the preservation of the natural curiosities and scenic beauties thereof."² Moreover, in the Alaska National Interest Lands Conservation Act (ANILCA) Congress specifically directed the NPS to manage Denali National Park for "continued opportunities, including reasonable access, for mountain climbing, mountaineering and other wilderness recreational activities."³ Because of its long history and specific management direction from Congress to maintain reasonable mountaineering access, mountain climbing should be viewed as a primary use and purpose of Denali National Park that the NPS should enhance and protect.

The purpose of DENA's "public involvement process" was to determine whether "the current mountaineering program is the most cost effective, efficient and safe program we can devise?" Yet, DENA seems mostly interested in "how much of the cost should be recovered from users, and what options are there for how those costs can be distributed?"⁴ This inflexible focus on revenue over cost-cutting is inconsistent with the current times.

One of our primary concerns is that the dramatic 150% fee increase proposed by the NPS will make it too expensive for many American climbers to access Denali, one of the most classic and highly sought-after summits in the World. It is also our view that DENA's proposal to establish a large and unprecedented special use fee for mountaineering does not constitute "reasonable access for mountain climbing" and thus DENA's \$500 per climber fee proposal should be reduced to a more appropriate level. The NPS should make a firm commitment to maintaining a reasonable and equitable mountaineering fee amount for the long-term, rather than repeatedly increasing the fee by such a high, unreasonable amount. It is our view that DENA's proposal to establish a large and unprecedented special use fee for mountaineering—that is too expensive for most Americans—does not constitute "reasonable access for mountain climbing" and thus DENA's \$500 per climber fee proposal should be reduced to a more appropriate level.

The Climbing Organizations believe that climbers are unfairly charged for aspects of Denali National Park that have nothing to do with the Mountaineering Program. Denali National Park's budget documents and public statements about the Mountaineering Program mischaracterize the actual costs that the necessary elements of the Mountaineering Program impose on Denali's operating budget. As you know, the test for special use fees is: if the activity went away, what would the cost be to the agency? Our view is that if DENA fairly accounted for the cost of servicing mountaineers on Denali

² 16 USC § 351.

³ See ANILCA, at Section 202(3)(a), found at <http://alaska.fws.gov/asm/nilca/title02.html#203>.

⁴ <http://www.nps.gov/dena/parknews/mountaineering-use-fee.htm>

their overall budget number would be much lower than what the Park publishes as justification for a fee increase.⁵

The proposed \$500 per person climbing fee for Denali and Foraker is not proportional to the costs incurred by climbers in DENA and is unprecedented when compared to other recreation fees charged elsewhere on federal public lands. The NPS proposal to increase mountaineering fees at DENA fails to outline various alternatives to the program itself that could cut costs. While some past considerations about the scope of Denali's Mountaineering Program were considered in a 2001 Congressional Report,⁶ the current fee increase proposal by the NPS offers no changes to the program itself and DENA staff at public meetings held in Alaska, Washington, and Colorado made clear that none of the elements of the current Mountaineering Program were discretionary, and that if the shortfall from costs and revenue was not covered then climbing on Denali may be subject to an "emergency closure." By fairly analyzing the actual budget impact climbers impose on DENA's Mountaineering Program, and looking for cost-cutting alternatives and additional revenue sources, the NPS should identify a reasonable and equitable fee—much less than \$500—to climb Denali.

In sum, the Climbing Organizations do not support the DENA's specific fee increase proposal because 1) climbers are unfairly charged for costs outside the scope of the Mountaineering Program, 2) there are aspects of the mountaineering program that may be modified to reduce costs and enhance the service provided to the climbing community, and 3) additional sources of Park revenue may more appropriately balance what DENA charges mountaineers to climb this world-class peak.

Special Use Fee Authority

Given the longstanding and special significance of mountaineering in Denali National Park, the Climbing Organizations question whether mountaineering fits DENA's "special use" designation. As noted, both DENA's enabling law and ANILCA recognize the significance of mountaineering in the Park and consider this activity as a primary purpose and core program. Furthermore, the NPS special use fee authority is typically used for short-term activities such as organized events, commercial filming, and other activities not otherwise managed under a concession contract. In recognizing the fundamental role that mountaineering has in the Park, DENA should consider whether this special use fee is appropriate at all. Also, expecting special mountaineering use fees to cover NPS salaries dedicated for a broad range of non-climbing Park purposes is inappropriate and not a practice followed at other national parks. Recreation and exploration were original uses of our National Parks, and the NPS has always followed a policy of keeping fees low to keep the parks accessible to all Americans. Rather than seek cost-recovery from climbers through an inappropriate and unfairly accounted-for special use fee, a better revenue alternative includes raising the entrance fees by a nominal amount rather than have one user group pay such a high fee per person to fund other Park operations. Finally,

⁵ <http://www.nps.gov/dena/parknews/loader.cfm?csModule=security/getfile&PageID=308286>

⁶ <http://www.nps.gov/dena/parknews/loader.cfm?csModule=security/getfile&PageID=308278>

Denali National Park should consider exempt climbing costs—or a percentage thereof—from “special use” cost recovery as provided by NPS Director’s Order #53 because mountaineering on Denali “will promote the specific mission of the park.”

DENALI NATIONAL PARK MOUNTAINEERING PROGRAM

Denali National Park provides unusually extensive, effective, and high quality search and rescue (“SAR”) services to climbers. DENA statements note that the majority of the cost of its Mountain Program can be attributed to climber education and staffing on Denali patrols to ensure and SAR readiness. Park budget documents also reveal that the Mountaineering Program is charged for SAR readiness needed and used elsewhere in the Park and outside the scope of servicing climbers on Denali or Foraker (more on that below, see projected 2011 DENA South District Budget attached).

Denali National Park pays for a specialized, high-altitude helicopter during the climbing season to be “on call” for rescues. The Park also maintains administrative camps at 14,200 and 7,200 feet to manage aircraft and climbers, and support NPS mountain patrols that facilitate SAR activities and other various needs related to climbing management. The degree that these extensive services are provided on Denali may be the most comprehensive anywhere and beyond the minimum necessary mandated by NPS policies which state that the “number and type of facilities to support visitor use, including sanitary facilities, will be limited to the minimum necessary to achieve a park’s backcountry management objectives and to provide for the health and safety of park visitors.”⁷ While the NPS must protect visitor safety, NPS policies also recognize that the

park resources it protects are not only visitor attractions, but that they may also be potentially hazardous. In addition, the recreational activities of some visitors may be of especially high-risk, high-adventure types, which pose a significant personal risk to participants and which the Service cannot totally control. Park visitors must assume a substantial degree of risk and responsibility for their own safety when visiting areas that are managed and maintained as natural, cultural, or recreational environments.⁸

This point was also raised by former longtime Denali South District Ranger Daryl Miller in his article emphasizing climber responsibility, education, and accountability as primary tools for self-sufficiency in wilderness travel, and not to rely on NPS rescue.⁹

Accordingly, DENA should analyze its various rescue and administrative services in the Park—within the context of the above-noted management policies—to determine whether it may be possible to eliminate or significantly reduce costs. The high-altitude rescues by highly skilled climbing rangers and helicopter pilots on Denali are necessary

⁷ See NPS Management Policies 8.2.2.4 Backcountry Use (2006).

⁸ NPS Management Policies 8.2.5.1 Visitor Safety (2006).

⁹ See Daryl Miller, “Humility in the Alaskan Wilderness,” Education and Communication (August 2005).

and important, but the NPS should nonetheless ask whether the current level of on-mountain presence is appropriate under NPS management policies, and whether climbers would adapt appropriately to a greater sense of self-reliance. While the Climbing Organizations do not support Park management that entirely eliminates these outstanding administrative and rescue services, we encourage the NPS to consider alternatives that streamline the extensive and expensive management practices within DENA, including modifying NPS patrols on Denali. Rangers' salaries are especially important to reconsider given that this cost is by far the most expensive budget item attributed to DENA's Mountaineering Program. Federal agencies across the country are being asked to examine programs and cut costs (including the President's proposed two-year freeze on federal salaries)¹⁰ and DENA should be no different.

PROPOSED DENALI MOUNTAINEERING SPECIAL USE FEE

Mountaineering fees on Denali and Foraker have gradually increased commensurate with the broadening of the scope of the Program. While the number of climbers that come to Denali (approximately 1,100-1,300 annually) has remained flat for the past 18 years, the Mountaineering Program and associated infrastructure has grown significantly. Ranger staff supporting mountaineers has increased from four mountaineering rangers in 1993 to twelve mountaineering rangers in 2010. A significant impact to the Park's South District budget which is mostly attributed to climbers is the 5,300 Talkeetna Ranger Station built in 1997. A \$150 cost recovery fee for the Mountaineering Program on Denali was implemented in 1995 and later increased to \$200 after a 2001 Congressional Report¹¹—spurred by a number of fatalities and major injuries—that analyzed 1) the suitability and feasibility of rescue cost recovery and requiring proof of medical insurance, and 2) a review of the Mountaineering Fee.

That Report found that charging for climbing rescue on Denali would unfairly single out one group of visitors and be inconsistent with the practice in all other federal government agencies. The Report directed that “any change from the status quo should be addressed by specific legislation and apply to all agencies conducting rescues for high-risk activities, regardless of location (climbing, sailing, small aircraft, hang gliding, and so on).” Denali should “continue its current policy of not charging for search and rescue” but seek to reduce SAR costs in other ways.¹² The 2001 Report also analyzed collecting higher fees for additional “enhancements” to the Denali Mountaineering Program, including adding ranger staff, improvements to resource protection, and human waste management programs (that including grant funding from the Climbing Organizations). The 2001 Report also studied reductions to the Mountaineering Program, including staff reductions, and removal of the 14,200-foot and 7,200-foot ranger camps but

¹⁰ See http://www.usatoday.com/news/washington/2010-12-01-fedpay01_ST_N.htm.

¹¹ <http://www.nps.gov/dena/parknews/loader.cfm?csModule=security/getfile&PageID=308278>

¹² Id. at 13. The Report also found that requiring proof of medical insurance is not suitable or feasible, based on the low percentage of climbers who actually need rescue and the complexity of validating a person's medical coverage, especially for the many international climbers.

recommended against any reductions in favor of Program expansion and a \$50 fee increase to “provide for one seasonal ranger to manage the program on the mountain, one park ranger to assist in the management of the program at the ranger station in Talkeetna, and expenses related to transporting, cleaning, and purchasing the human waste containers.” The Report also considered whether to cancel DENA’s rescue helicopter contract (funded directly from Congressional Appropriations and not a cost billed to the Mountaineering Program), but concluded that “the park uses the helicopter for many of its programs, including rescue [and resource protection]. The National Park Service contract high-altitude helicopter is crucial to the safety of the mountaineering rangers and their volunteers.” After this report DENA again extended the broad scope and high cost of the Mountaineering Program by contracting with helicopter services to supply high altitude camps and ensure SAR readiness.

Denali National Park now seeks to recover more of the cost of the Mountaineering Program because the current fee “revenue only covers 17% of the cost of this specialized program” because “operational expenses have gone up significantly.” To justify this proposed Mountaineering Fee increase from \$200 to \$500, DENA claims that

McKinley/Foraker climbers make up less than ½ of 1 percent of the 378,000 people who visited the park in 2010. Denali will expend approximately \$1,200 in direct support of each permitted climber in 2011. In contrast the average cost for all other visitors is expected to be about \$37.¹³

However, these numbers are based on the continued projection DENA claims for Mountaineering Program costs with no modifications. These comments from the Climbing Organizations illustrate DENA’s flawed accounting that unfairly attributes Park costs to climbers. For example, a more appropriate cost comparison would be to compare the cost to service climbers with the cost to service other backcountry users, not Park visitors that never leave developed areas of the Park. Further, in previous years DENA sought only 30% cost recovery from climbers for the Mountaineering Program yet now seeks a full 100% cost recovery. The original intent of the Mountaineering Fee in 1995¹⁴ was to offset the administrative costs mountaineering in the Park and not to cover the entire program. Nowhere else does the NPS seek such a high percentage of cost recovery for similar uses, and this is particularly inappropriate in DENA where mountaineering is a legislated purpose of the Park.

The Park also claims that in recent years it has

diverted funds from other critical park programs in order to fully fund the mountaineering program, [and] this has negatively impacted funding available for

¹³ See DENA Briefing Statement at <http://www.nps.gov/dena/parknews/loader.cfm?csModule=security/getfile&PageID=308286>.

¹⁴ http://www.nps.gov/dena/planyourvisit/upload/1995_Mtnrg_Summary.pdf

programs such as interpretation, wildlife protection, resource management, and maintenance.”¹⁵

Nowhere does DENA specifically document where other Park programs have suffered reduced budgets to pay for the Mountaineering Program. Rather, the Climbing Organizations believe that instead of climbers taking funds from other park programs, the NPS significantly overstates the cost of the Mountaineering Program to the Park.

According to the NPS, the Denali Mountaineering Fee currently funds five primary categories: preventative search and rescue education, training for rescue personnel, positioning of patrol/rescue personnel (including volunteers) at high altitude locations on the mountain, the human waste program, and administrative support. However, DENA budget documents show that the cost of many other non-climbing uses, activities, programs, and services are attributed to the cost of the Mountaineering Program. The comments below provide 1) suggestions regarding how DENA may modify the scope of its Mountaineering Program to cut costs, and 2) the appropriate method to measure the costs of mountaineering in Denali as directed by NPS Management Policies.

SPECIFIC RECOMMENDATIONS

Before the NPS looks to expand mountaineering fees at DENA, the Park should look at its other, non-mountaineering related programs to determine what percentage of those costs are passed on to the visitors who actually use or need those specific services, and what percentage of these costs should be removed from the Mountaineering Program budget. For example, hikers, backpackers, snowmobilers, scenic tour passengers, fishermen, cyclists, hunters and other dispersed backcountry users currently are not charged fees for accessing the backcountry, though presumably they incur significant amounts of management time and expense. Also, the Park has many administrative and management costs—such as the use of the helicopter to enforce anti-poaching laws—that are unfairly attributed to climbers at too high of a percentage.

National Park Service Reference Manual #53 (RM53) provides

guidance on how costs associated with special park uses are determined and where funds collected are to be credited. Accounting procedures and internal controls used must assure that funds collected are credited to the proper accounts. [Furthermore,] charges established for a special park use under this authority are intended to recover costs associated with managing that activity and not to generate revenue beyond actual cost.¹⁶

Fees will be assessed against each identifiable recipient for special benefits derived from Federally-permitted activities beyond those received by the general public. Reference

¹⁵ Id.

¹⁶ See <http://www.nps.gov/applications/npspolicy/DOrders.cfm>

Manual #53 specifies “recoverable costs are those costs directly attributable to the use. Costs are recoverable when such costs would not have been incurred if the activity did not take place, or, are necessary, in the judgment of the NPS, for the safe completion of the special park use.”¹⁷ Thus, the test whether DENA can recover costs from climbers for each budget category (see below), is whether the cost would have incurred had climbers never been supported on Denali by the NPS.

Helicopter Costs/Budget

The \$247,200 helicopter contract used in Denali National Park provides a broad range of specific SAR services (not billed to the Mountaineering Program), many of which service non-climbers and even areas outside DENA. This helicopter contract provides for medical support and readiness for SAR through supplying the high-altitude camps on Denali, and this readiness aspect of the scope of work for the helicopter contract is a significant cost added to the Mountaineering Program budget. However, this helicopter also provides significant value to other DENA visitors and programs, such as anti-poaching enforcement and SAR readiness for passengers on scenic air tours or anywhere else in the Park.

Denali National Park’s Projected 2011 South District Budget budgets the total cost of the Mountaineering Program at \$1,160,000 including \$247,200 for the helicopter contract. Yet the Park also acknowledges that it receives “\$440,000 in base increases to fund the high altitude helicopter program.”¹⁸ It is inappropriate for DENA to charge such a higher percentage of the helicopter contract to the Mountaineering Program because it receives far more base increases to cover the cost of the aviation program. Further, this helicopter is used for many other park programs, and DENA writes off from the Mountaineering Program 33% of jet fuel costs and pilot per diem, and a total of \$41,200 for 20 days of non-climbing SAR activity and another \$41,200 for 20 days of other non-climbing park use. The Climbing Organizations believe that the helicopter is used for far more than 20 days of non-climbing SAR, and more than 20 days of other non-climbing uses. For example, during hunting season the helicopter is used almost every day to survey the Park for illegal poaching. These numbers should be modified significantly and attribute much less of the \$247,200 helicopter contract cost to the Mountaineering Program.

National Park Service Management Policies state that “[f]ee rates will be reasonable and equitable, and consistent with criteria and procedures contained in law and NPS guidance documents.”¹⁹ National Park Service Reference Manual #53 clearly states that costs are recoverable when “such costs would not have been incurred if the activity did not take place.”²⁰ Thus, it is contrary to NPS policies to inequitably charge climbers for costs they

¹⁷ Id. at RM-53 - Special Park Uses Management of Permit Fees, page C10-3.

¹⁸ See DENA Briefing Statement at <http://www.nps.gov/dena/parknews/loader.cfm?csModule=security/getfile&PageID=308286>.

¹⁹ See NPS Management Policies 8.2.6.1 (2006).

²⁰ RM-53 - Special Park Uses Management of Permit Fees, page C10-3.

did not incur, such as the many additional purposes and costs of the helicopter outside the scope of the Mountaineering Program. The Climbing Organizations believe that climbers should pay their fair share for the specific costs that we contribute to Denali National Park's budget. However, this helicopter contract is used for SAR readiness is also used for many non-climbing-activities and purposes throughout the Park.

Denali National Park should remove all costs related to the helicopter contract, which are billed to the Mountaineering Program until it has fairly accounted for all other uses of the helicopter and charge those user groups and Park programs a fee that is proportionate to what climbers are charged. DENA should modify the cost of the Mountaineering Program to reflect the \$440,000 base funding for aviation and the fact that at least 33% of the helicopter use (as reflected in the fuel and pilot per diem write offs) is dedicated to other Park uses. Other specific costs related to the helicopter contract are unfairly attributed 100% to climbers such as the helipad lease, manager training, satellite phones, training, administrative travel, and pilot fees (climber even pay 100% of the helipad outhouse rental!). Accordingly, DENA should greatly increase the percentage write-off in the projected 2011 South District Budget so that climbers are not unfairly burdened with helicopter costs that support many other Park uses.

Helicopter Costs/Program Recommendations

Denali National Park should consider additional ways to cut Mountaineering Program costs related to the helicopter, including alternate means of supplying the high-altitude camps including fixed-wing options and partnering with the military who may combine high altitude training and research with camp insert and extract operations. Fixed-wing and/or military options to supply the 14,200 camp may reduce the \$49,060 billed to the Mountaineering Program for camp insert and extract.

Denali National Park Staff Salaries and Volunteer Support Costs/Budget

Park ranger salaries are by far the largest part of the Mountaineering Program budget.²¹ According to Park budget documents, the cost of "personal services" to support the Mountaineering Program exceeds \$706,000, while all other South District ranger and volunteer costs only amount to approximately \$274,590. As with the helicopter contract, the Climbing Organizations believe that DENA is unfairly charging the Mountaineering Program for NPS salaries that service many other Park programs and users. While the DENA projected 2011 South District Budget reduces 30-40% the salaries for NPS rangers dedicated to other South District operations this percent reduction is not be nearly enough. It is unclear why this particular 30-40 percentage is the appropriate reduction and if a lower percentage of NPS salaries should be attributed to the Denali Mountaineering Program. Rangers that staff the Talkeetna Ranger Station and patrol the Park far from Denali itself provide a wide range of functions and services, many unrelated to

²¹ Denali Superintendent Anderson wrote to the American Alpine Club in 2008 that the mandated salary cost of living increases were one of the five reasons for the necessary fee increase and that the "dilutive effect on the park budget over a multiple year period is significant."

mountaineering. The costs of paying all these NPS salaries should not be shouldered by climbers at such a high percentage.

Again, the test for appropriate recoverable costs should be whether these salaries would burden the Park if there was no NPS Mountaineering Program on Denali. Clearly, the South District would be staffed and many other services provided to other Park visitors such as the thousands of “flightseers,” bus tourists, cyclists, backpackers, photographers, dog-sledding, fishing, wildlife viewing, and others that visit Denali. The cost to service these visitors—and conduct other Park programs such as interpretation and law enforcement related to poaching—would seem to exceed the 20-40% cost that DENA attributes to costs related to these uses, activities, and programs.

It is clearly unfair that climbers are asked to pay most of the costs to support South District facilities, including 80% of the cost of janitor supplies, carpet cleaning, sewer, electricity, propane, and building alarm system at the Talkeetna Ranger Station. Climbers are even responsible for 60% of janitor salaries! Climbers represent only 4% of those visiting the Talkeetna Ranger Station but pay about 70% of the cost to support the facility. The 60-80% of the South District’s salary costs that are attributed to the Mountaineering Program also does not pass the special use fee test as these salaries also support the many other non-climbing Park uses, activities and programs. Accordingly, DENA should greatly increase the percentage write-off in the projected 2011 South District Budget so that climbers are not unfairly burdened with salary costs that support many other Park uses.

Denali National Park Staff Salaries and Volunteer Support Costs/Program Recommendations

In the field and administratively at the Talkeetna Ranger Station, DENA should consider ways to find efficiencies and reduce the cost of personal services attributed to the Mountaineering Program. In particular, the NPS should consider the following:

1. **Modify staffing protocols** that always require multiple high-paid GS-rated NPS staff for mountain patrols during climbing season.
 - a. Phase in a more diverse range of salaries to staff the Mountain Program. DENA should require SAR/EMS training and mountaineering experience, but no law enforcement credentials that increase salaries. If DENA needs more funding to prosecute illegal guiding, increase the percentage of franchise fees that support the Mountaineering Program.
 - b. Place more volunteers into the rotation on Denali mountain patrols. Test a reduction from two paid staff per patrol to one paid staff per patrol using volunteers. Increase the utilization of acclimatized guides for SAR readiness whenever possible.
 - c. Modify staff training by limiting travel costs the cost: Do Denali Rangers need to go to Mongolia for training related to work on Denali? If so, perhaps these trips can be funded from private sources.

2. High-paid GS-rated NPS staff also conduct **administrative services** to climbers during the off-season that are charged to the Mountaineering Program. The NPS should limit the off-season administrative work conducted by highly-paid staff and assess what portion of this work does not require mountain expertise and can be contracted cheaper.
3. Reduce costs related to **supplying the high-altitude camps** and other efforts that support SAR readiness. The Park should reconsider the appropriate level of readiness required to be maintained by the NPS high on the mountain.²²
 - a. Consider whether camp infrastructure can be reduced (i.e., large frame tents at the 14,200 Camp), and whether gear and supplies may be delivered more cheaply.
 - b. Reduce the budget (\$50,000) dedicated for staff gear and supplies replacement if gear and supplies are being replaced through SAR compensation.
4. **Orientation.** Consider whether the Mountaineering Program registration systems can better target and screen at-risk groups that historically have caused more SAR incidences (thus requiring more Program-wide safety protocols and associated costs) to further improve safety on Denali and thus reduce overall costs. The Park should also analyze whether a more streamlined off-season orientation protocol (such as only staffing this service 2-3 days per week) could reduce staffing costs.

Revenue Generated For Denali's Mountaineering Program

In addition to analyzing the cost on Denali National Park's Mountaineering Program, the NPS should also consider adjustments to the revenue side of the program. The Climbing Organizations recommend considering the following strategies:²³

Entrance Fees

Denali has the special significance as a "Seven Summit," and attracts many non-climbers. These hundreds of thousands of Park visitors (roughly 400,000 each year) hire tour busses or scenic flight companies to tour the Park, many times for an up-close viewing of mountaineers on route to the summit. As such, it is reasonable for the NPS to consider raising the general entrance fee a nominal amount to support the specific Park values and activities that attract non-climbing DENA visitors who nonetheless appreciate Denali and its rich mountaineering history. The importance that Denali has for all Park visitors is underscored by the mountaineering purpose that Congress mandated twice through

²² See again NPS Management Policies 8.2.5.1 Visitor Safety, and 8.2.2.4 Backcountry Use (2006).

²³ There are not enough climbers visiting other areas of DENA outside of Denali and Foraker to warrant additional mountaineering fees in those locations. NPS Management Policies state that "[f]ee rates will be reasonable and equitable, and consistent with criteria and procedures contained in law and NPS guidance documents." See NPS Policy Manual Section 8.2.6.1 (2006). We believe that charging climbing access in DENA outside of Denali and Foraker when other, more numerous backcountry users are not being asked to do so would be unreasonable and unfair.

legislation governing Denali National Park.²⁴ Even accepting DENA's budget numbers regarding the amount needed to fund the Mountaineering Program, if the Park raised the entrance fee \$2 from \$10 to \$12 per person (or from \$20 to \$25 per vehicle), the Park's estimated \$520,00 shortfall would be covered. An entrance fee increase spreading the financial burden among all DENA visitors is equitable given that most Denali National Park visitors greatly value Denali and are at least in part attracted to the Park for its mountain and mountaineering tradition.

The Climbing Organizations understand that the process for raising specific National Park entrance fees requires Congressional approval, and we remain committed, given DENA support for the concept, to work with the Congressional representatives of our membership to consider the unique world class status of Denali which attracts significant international visitation, and increase the Park entrance fee nominally by \$2 to cover any DENA budget shortfall related to mountaineering or any other Park program.

Franchise Fees

Denali National Park should use as much of the mountaineering concession franchise fees as possible to support the Mountaineering Program rather than steer this revenue towards other non-climbing park programs. According to Park documents, DENA collects roughly \$87,000 in guiding concession fees from authorized mountaineering or South District concession holders but retains just \$70,000, with the balance funding non-climbing related deferred maintenance and capital projects. During this time of budget tightening, the Climbing Organizations urge DENA to request special authorization to utilize as much of the franchise fee revenue as possible to put towards Mountaineering Program operations.

Federal Appropriations

The Climbing Organizations have consistently supported full funding of national parks and have specifically supported funding for Denali National Park's general operating budget to members of Congress. However, since Denali has the second highest average SAR cost of all NPS units (around 7% of total NPS SAR costs), DENA should receive more support from the Regional NPS budget for preventative SAR. We will continue to support Denali and its Mountaineering Program by educating members of Congress as to the significance of Denali to the American and international climbing communities, and the need to maintain its accessibility for Americans including keeping fees low-enough so that more than just wealthy climbers have the means to climb in this World-class national park.

CONCLUSION

As directed by federal law, Denali National Park must preserve for future generations the unique natural conditions of DENA, as well as the unique mountaineering opportunities

²⁴ See Denali National Park's Enabling Law at 16 USC § 351, and Section 202(3)(a) of the Alaska National Interest Lands Conservation Act.

found there. An important part of maintaining reasonable access for climbing in the Park is to keep fees at a level that most American can afford. In order to accomplish this goal, the Access Fund, American Alpine Club, and American Mountain Guides Association ask DENA to reconsider the actual costs of mountaineering in the Park, adjust the scope for its Mountaineering Program as suggested herein, and implement a fee structure that is consistent with NPS policy and the fee rates applied to other Park users.

The Climbing Organizations urge the NPS to re-evaluate its proposal to increase the Mountaineering Fee to \$500 and make key programmatic changes to the scope of the Mountaineering Program. The Access Fund, American Alpine Club, and American Mountain Guides Association look forward to future opportunities with the NPS to maintain climbing access and conserve the climbing environment at Denali National Park.

Sincerely,



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The Honorable Mark Udall, United States Senate
The Honorable Lisa Murkowski, US Senate
The Honorable Mark Begich, US Senate
The Honorable Don Young, US House of Representatives
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US Senate National Parks Subcommittee
US House of Representatives Interior Appropriations Subcommittee
US House of Representatives National Parks, Forests, and Public Lands Subcommittee
Jon Jarvis, Director, National Park Service
Will Shafroth, Deputy Assistant Secretary for Fish, Wildlife, and Parks,
US Interior Department
Garry Oye, Chief of Wilderness Stewardship & Recreation Management,
National Park Service
Rick Potts, Chief of Conservation & Outdoor Recreation Division, National Park Service