



Protect America's Climbing



January 26, 2011

Superintendent Dave Uberuaga
ATTN: Climbing Cost Recovery Fee
Mount Rainier National Park
55210 238th Ave. E.
Ashford, WA 98304

**Re: Access Fund, American Alpine Club and American Mountain Guides Association
Comments to the Mount Rainier National Park Mountaineering Fee Increase
Proposal**

Dear Superintendent Uberuaga:

On behalf of the Access Fund, American Alpine Club, American Mountain Guides Association, and the American climbing community, we write to comment on the National Park Service's proposal to increase mountaineering fees for Mount Rainier National Park ("MORA" or "the Park"). 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) ways to improve MORA's mountaineering program, and 2) establish the appropriate fee level for climbing in this world-class climbing park. We appreciate Rainier National Park's effort in publishing a cost analysis for its Mountaineering Program, the increased use of guide franchise fees to support mountaineers, and a genuine review of the Program that produced alternatives to the fee proposal.¹ There are additional opportunities at Mount Rainier to find efficiencies in its Mountaineering Program that will cut costs. With the modifications recommended herein, the Climbing Organizations conditionally support the Park's "Essential 2011 Climbing Program" proposal that raises the Mountaineering Fee from \$30 to \$43.

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 Mount Rainier 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

¹ <http://www.nps.gov/mora/parkmgmt/loader.cfm?csModule=security/getfile&PageID=391109>

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>.

GENERAL REMARKS

Mount Rainier has been a climbing destination for over 150 years, attracting mountaineers to its spectacular glaciers, variety of alpine climbing routes, and unique views all within a two-hour drive of Seattle. Nowhere else outside of Alaska can American climbers find such a challenging combination of glaciers and relatively easy access. Mount Rainier remains North America's premiere mountaineering destination with over 10,000 ascents each year out of approximately 2 million annual Park visitors. Mount Rainier National Park was established in 1899 to "provide for the preservation . . . of all . . . natural curiosities, or wonders within said park, and their retention in their natural condition . . . for the benefit and enjoyment of the people. . ."² As directed by the NPS Organic Act, the Redwood Act for Expansion, the Park's enabling legislation, the major activities conducted by MORA are the protection and preservation of natural and cultural resources, and the provision for use of the park such as mountaineering.

Mount Rainier's proposed \$43 and \$58 per person climbing fee is not proportional to like recreation fees charged elsewhere on federal lands. The Climbing Organizations believe that there are aspects of MORA's Mountaineering Program that should be modified to reduce costs and enhance the service provided to the climbing community. 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."³ We believe that mountaineers are unfairly targeted for this special use fee when other Park users are not similarly asked to pay their fair share. For example, hikers, backpackers, and other dispersed backcountry users currently are not charged fees for accessing Camp Muir, but climbers nonetheless foot the bill for their management. It is also important to note that a large percentage of search and rescue ("SAR") activities at MORA occur below Camp Muir. Before the NPS looks to expand mountaineering fees at MORA, the NPS should look at other non-mountaineering related uses, activities, and programs to determine their appropriate costs and what percentage of these costs are unfairly paid by climbers.

The NPS proposal to increase mountaineering fees on MORA outlines three alternatives, from the 2010 "Deficient Program" at \$30, to an "Essential Program" costing \$43, and finally an "Enhanced Program" that would raise fees to \$58 annually in addition to per trip costs of \$20 for the backcountry camping permit (used by nearly all Rainier climbers) and the \$15 entrance fee. Mount Rainier documents state that the Mountaineering Fee goes towards the following direct costs:

² Mount Rainier National Park Act (1899).

³ NPS Management Policies 8.2.6.1 (2006).

Climbing Rangers	\$229,850
Human Waste (personnel and supplies)	\$65,000
Supplies/Equipment	\$34,732
BC Per Diem	\$10,217
Training	\$8,900

By all accounts MORA’s safety and climber education programs are excellent and the Climbing Organizations support this continued service. Our concern is that the fee increases proposed by the NPS will prove unnecessary if some reasonable cuts are made to the Program, such as modify staffing protocols and related costs concerning climbing rangers. The highest fee proposal may also be too expensive to many Americans that aspire to climb Mount Rainier, one of the most classic and highly sought after summits in the United States. This comment letter provides suggested modifications to the Mount Rainier Mountaineering Program that we believe will reduce its cost and thus limit the need for a significant and unjustified fee increase.

Special Use Fee Authority

Given the longstanding tradition and core nature of mountaineering in Mount Rainier National Park, the Climbing Organizations also question whether mountaineering is a “Special Use” of MORA. As noted, the long tradition of climbing in the Park and the fact that Rainier’s enabling law recognize the importance of public use, MORA should consider mountaineering as a primary purpose of the Park and thus not a “special use.” The special use fee authority cited by the NPS is typically used for short-term activities such as organized events, commercial filming, and other activities not otherwise managed under a concession contract. Mount Rainier, in recognizing the fundamental role that mountaineering plays in the Park, should consider whether this special use fee is appropriate at all.

Furthermore, expecting special use fees to cover staff salaries is inappropriate and not a practice followed at other national parks. Recreation and exploration was an original use of the parks and the NPS has always followed a policy of keeping fees low to keep the parks accessible to all Americans. Better funding alternatives include an increased general operations budget or raising the entrance fees by a nominal amount rather than requiring one user group pay such a high fee per person. Finally, MORA should exempt climbing costs—or a percentage thereof—from “special use ” cost recovery as provided by NPS Director’s Order #53 because mountaineering on Mount Rainier “will promote the specific mission of the park.”

MOUNT RAINIER NATIONAL PARK MOUNTAINEERING PROGRAM

Mount Rainier National Park provides unusually extensive, effective, and high quality search and rescue services to climbers. Park budget documents show that the majority of the cost of the Mountain Program can be attributed to staffing mountain patrols, SAR readiness, climber education, and human waste removal. These efforts include specialized administrative camps for climbers, NPS staff, and volunteers at camps Muir and Schurman, and mountain patrols to facilitate rescues and climbing management. National Park Service Management Policies 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.”⁴ Accordingly, MORA 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 downsize or reduce these services and eliminate or significantly decrease costs. The rescues performed by highly skilled climbing rangers and helicopter pilots on Mount Rainier are necessary 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 necessarily support an alternative that eliminates entirely MORA’s outstanding administrative and rescue services, we encourage the NPS to consider alternatives that reduce the intensive and expensive management practices at MORA, including modifying staffing for mountain patrols. Ranger salaries are especially important given that this cost is by far the most expensive budget item attributed to Rainier’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) and MORA should act accordingly. We believe that MORA can make some key cuts and still maintain effective SAR readiness and a safe working environment for NPS staff and volunteers.

MOUNT RAINIER MOUNTAINEERING SPECIAL USE FEE

According to Mount Rainier National Park documents, the Mountaineering Fee currently funds five primary needs:

- **Safety** information related to route conditions, weather forecasts and potential hazards.
- **Orientations** to help prevent accidents and injuries requiring rescue.
- **Leave-No-Trace** education.
- **Human Waste Management:** Toilets at high camps and the “blue bag” field system.
- **Wilderness and Carry Capacity** Management

To provide these services, MORA employs highly skilled climbing rangers who work with volunteers to manage the mountain, inform and help climbers, monitor use on the upper mountain, and respond to emergencies.

MORA’s Mountaineering Program is mostly funded by cost recovery revenue from fees paid by each climber. Mount Rainier now proposes a fee increase in the annual pass fee from \$30 to between \$43 and \$58, with yearly adjustments thereafter determined by changes in the Consumer Price Index.⁵ To justify a proposed 2011 Mountaineering Fee increase, MORA claims that the

⁴ NPS Management Policies 8.2.5.1 (2006).

⁵ The Climbing Organizations do not support an annual increase in fees due to Consumer Price Index as many people in MORA’s surrounding communities have suffered from zero pay increases, pay cuts, and lay-offs and these

Park's Mountaineering Program is currently unable to fulfill responsibilities due to inadequate funding and staffing. Specifically MORA states

Two factors have contributed to the current funding shortfall in the park's Climbing Program: Climber numbers—and the resulting pass revenues that support the climbing program—were expected to increase over time and this hasn't happened. Concurrently, eight years of unfunded cost increases since 2003 have taken their toll on the program's budget and staffing.⁶

In sum, MORA claims that its Mountaineering Fee revenue has dropped while costs for the Park's base level of service have increased.

SPECIFIC RECOMMENDATIONS

The Climbing Organizations submit the following recommendations that we feel will appropriately modify the scope of Mount Rainier's Mountaineering Program, improve its efficiency, and lower costs. We also outline alternate sources of revenue to fund the Mountaineering Program.

Cost of Mount Rainier's Mountaineering Program

Mount Rainier attributes 2/3 of the costs for the Mountaineering Program to pay climbing ranger salaries. To serve the needs of climbers, NPS climbing rangers live and operate in a high risk environment and must be competent in five core skill areas: mountaineering, emergency medical training, technical rope rescue, helicopter training, and avalanche safety. While the climbing rangers on Rainier are highly valued and the Climbing Organizations very much appreciate their service to the mountaineering community, MORA should consider if there are efficiencies that could reduce the cost of requiring highly-trained (and GS-rated) NPS staff on the mountain.

Mount Rainier National Park should consider the following modifications to Program costs that are charged to the Mountaineering Program:

1. Reduce the high-paid GS-rated NPS staff who regularly patrol the mountain during climbing season and conduct administrative services to climbers during the off-season. Limit the off-season administrative work conducted by highly-paid staff. Look elsewhere for cheaper administrative support.
2. Modify staffing protocols that always require multiple high-paid GS-rated NPS staff for mountain patrols during climbing season. Phase in a more diverse range of salaries to staff

incomes would not keep pace with such CPI increases. Again, note the recent announcement of the President's Cost of Living Salary Freeze for all government employees.

⁶ <http://www.nps.gov/mora/parkmgmt/loader.cfm?csModule=security/getfile&PageID=391109>. It is important to note that since the last fee increase in 2003 when it jumped to \$30, climber numbers have dropped by over 30%. Significant fee increases may only further the decrease in numbers and not produce the expected revenues for the program as climbers opt to climb no-fee and less expensive peaks.

the Mountaineering Program. MORA should require SAR/EMS training and mountaineering experience, but no law enforcement credentials that increase salaries.

3. Place more volunteers into the rotation on Rainier mountain patrols. Reduce the number of paid staff per patrol and increase the use guides whenever possible. Consider using the Washington Mountain Rescue Association (WMRA) and set up patrols with the NPS on the mountain putting rescue-trained volunteers in position to aid in rescues and increase SAR readiness in a more cost-effective way. As incentive for qualified SAR volunteers, the Program should allow volunteer use of facilities, flexible dates (short term notice available), and waiving the Mountaineering Fee in exchange for assistance with SAR readiness, route condition briefings, and climber orientation.
4. Provide most in-person information/orientation to climbers at nightly group briefings at Camp Muir, as this may be more cost-efficient and timely than delivering in-person reports at entry. Consider leveraging guides and private climbers for updating route information, and develop a program where guides perform some of the group briefings at Muir and are compensated accordingly.
5. Consider mechanisms to administer the human waste program more efficiently. MORA did not release data regarding compliance with blue bags and there are several different methods that could be employed to increase compliance.⁷

Funding for Mount Rainier's Mountaineering Program

In addition to analyzing the cost of Mount Rainier National Park's Mountaineering Program, the NPS should also consider revenue alternatives. The Climbing Organizations recommend that MORA consider the following strategies:

Franchise Fees

A higher percentage of MORA mountaineering concession franchise fees should fund a higher percentage of the Mountaineering Program costs. Mount Rainier collects roughly \$437,500 in franchise fees from three authorized concession holders of which 80% is retained by the park. The Park has prioritized the use of mountaineering franchise fees for non-climbing uses such as deferred maintenance and one-time capital improvement projects. While MORA proposes to increase the amount of franchise fees that go to the Mountaineering Program (from \$19,000 to \$71,000), a higher percentage of the \$437,500 collected should support mountaineering because this is the activity from which the revenue was generated. During a time of budget tightening, the Climbing Organizations urge Mount Rainier to request authorization to utilize as much of the mountaineering guide franchise fee revenue as possible towards existing Mountaineering Program operations and not towards projects unrelated to servicing mountaineering.

⁷ For example, additional staffing is not the only method: blue bags could be bar coded and any blue bags not returned could be assessed a fee. Climbers returning blue bags could receive a credit towards future Rainier Mountaineering fees for each bag that they return which was not issued to them.

Federal Appropriations

Rainier uses approximately \$225,000 of base funding to support the Mountaineering Program, which pays for operation and maintenance of ranger stations, the Climbing Information Center, Emergency Operations Center, Camp Muir and Camp Schurman structures, employee housing, communications, and custodial support. The Climbing Organizations have consistently supported full funding of national parks to members of Congress and have specifically supported funding for Mount Rainier National Park's general operating budget. The Climbing Organizations urge MORA to increase the base budget amount dedicate to the Mountaineering Program to cover any budget shortfall the Park has related to the Mountaineering Program. We will continue to support Mount Rainier and its Mountaineering Program by educating members of Congress as to the significance of Mount Rainier to the national and international climbing communities.


Additional Revenue-Generating Possibilities

Other Park users should pay their fair share of the Mountaineering Program's costs, especially day users of the Camp Muir area. The Climbing Organization urge MORA to analyze ways to spread the costs over all visitors to the Alpine Zone instead of targeting just climbers. It is unfair to ask one user group to pay for the management of a park area shared with many other users.

CONCLUSION

As directed by federal law, Mount Rainier National Park must preserve for future generations the unique natural resources and world-class mountaineering opportunities found in the Park. An important part of maintaining reasonable access for climbing in the Park is to keep fees at a level that most Americans can afford. In order to accomplish this goal, the Access Fund, American Alpine Club, and American Mountain Guides Association ask MORA to consider adjusting the scope of 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. With our recommended Program modifications outlined in this letter, the Climbing Organizations conditionally support MORA's "Essential Program" and a fee increase to \$43. We hope that these comments are helpful in modifying the scope of Mount Rainier's Mountaineering Program as well as determine an appropriate fee level. 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 Mount Rainier National Park.

Sincerely,



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Cc:

The Honorable Patty Murray, US Senate

The Honorable Maria Cantwell, US Senate

The Honorable Mark Udall, United States Senate

The Honorable Dave Reichert, US House of Representatives

US Senate Interior Appropriations Subcommittee

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

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