

January 21, 2003

Jill Hawk  
Chief Ranger, Mount Rainier National Park  
Tahoma Woods, Star Route  
Ashford, WA 98304

**Re: Analysis of the Mount Rainier Climbing Program; Proposal to Increase Special Fee**

Dear Chief Ranger Jill Hawk,

The Access Fund welcomes the opportunity to comment on Mount Rainier National Park's *Mountaineering Cost Recovery Proposal: Analysis of the Program—Proposal to Increase Special Fee* (hereafter *Cost Recovery Proposal*) and associated *Analysis of the Mount Rainier Climbing Program* (hereafter *Analysis*). We look forward to working with the National Park Service to preserve climbing opportunities and conserve the climbing environment at Mount Rainier National Park.

#### **The Access Fund**

The Access Fund is a 501(c) 3 non-profit conservation and advocacy organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climbing organization, with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rockclimbers and mountaineers nation-wide. The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission.

The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; works closely with local climbers, land managers, environmental organizations, and other interest groups to manage and preserve climbing areas throughout the United States; develops and distributes climber education materials; acquires and manages land; and provides funding for conservation and impact-mitigation projects, and for scientific research relevant to the climbing environment. A significant number of the Access Fund's members climb in the Pacific Northwest including Mount Rainier National Park.

## **GENERAL REMARKS**

Mount Rainier National Park (MRNP) is an outstanding natural and recreation resource that benefits many user groups locally, nationally and internationally. Mountaineers, in particular, look to Mount Rainier for the unique and challenging climbing opportunities found there. Mount Rainier is a symbol of American alpinism, which many instantly recognize. As you well know, climbers come to MRNP from the Pacific Northwest to climb the mountain, but others travel considerable distances to experience the unique challenges found at Mount Rainier. The Access Fund is concerned that the proposed fee increase found within the *Cost Recovery Proposal* will limit or at least significantly burden many of these users. Moreover, the Access Fund feels that MRNP has not adequately justified its proposed 100% fee increase.

As with all public land management agencies, it is clear that MRNP is chronically underfunded and understaffed. While the NPS at MRNP has the authority in some circumstances to raise these special fees, without a better reasoned and articulated need for such an increase the Access Fund must oppose the preferred alternative #3 specified in the *Cost Recovery Proposal*. Other alternatives should be explored before MRNP implements a mountaineering fee increase. Given the available alternatives provided in the *Cost Recovery Proposal*, the more gradual fee increase outlined in alternative #2 constitutes a more reasonable and defensible management direction for MRNP's climbing program. Please consider the Access Fund's comments submitted herewith.

### **Existing Widespread Recreation Fees in the Pacific Northwest**

Mountaineers in the Pacific Northwest are perhaps the most over-charged user group in the country—especially when compared to other users of the same resource such as hikers and users of developed campgrounds. The mountaineering experience should not be accessible only to the wealthy. MRNP should be sensitive to the local population, many of which cannot afford excessive fees—especially ones such as this proposal that are increased 100% without adequate justification.

Consider the following list of recreation fees that are already required to access public lands in the Northwest:

- ✓ ✓ \$65 Golden Eagle per family

- ✓ ✓ \$20 for Snow-Park Pass per vehicle
- ✓ ✓ \$30 NW Forest Pass per vehicle
- ✓ ✓ \$50 Washington State Park Pass (proposed)
- ✓ ✓ \$25 Oregon State Park Pass per vehicle
- ✓ ✓ \$30 annual Cascade Volcano Pass per person; \$15 per peak per person
- ✓ ✓ \$30 annual Rainier Climbing Permit per person; \$15 per peak per person
- ✓ ✓ Camping Fees

Given that recreationists in the Pacific Northwest are already over-charged to access public lands, this proposal to raise the Rainier mountaineering fee 100% is too extreme a measure. Many local mountaineers (who do not use expensive facilities and travel on snow) may pay out in excess of \$500 per year. This is a sizeable sum—prohibitive for many—and MRNP should carefully consider whether a 100% fee increase is appropriate given similar fees assessed at other regional mountaineering areas (\$15 for both Mount Adams and Mt. St. Helens; \$0 for Mt. Hood).<sup>[1]</sup> MRNP should also consider the precedential effect of this fee increase. Other mountaineering areas in the region (Adams, Baker, Hood, St. Helens) will likely follow suit and raise their fees after MRNP has increased its fees. The result will be even more fees in an already over-charged region.

### **Public Expectations of Park Services**

The *Analysis* is flawed because MRNP did not systematically gather data to define public expectations. Indeed, the *Analysis* provides no support for its presumptions of service expectations at MRNP. This is especially problematic because in large part the *Cost Recovery Proposal* justifies the 100% fee increase through supposed unmet public expectations. It is not clear whether the *Analysis* expresses actual public expectations or rather services that MRNP wishes to provide.

The need for increased costs should be evaluated through a systematic evaluation of public expectations in conjunction with an assessment of MRNP's purpose and available current and future resources. MRNP should methodically survey its various user groups and inquire what services they want and at what cost level they would be willing to pay for these services. Many users may very well wish to forgo some of the services proposed under the preferred alternative #3 if their costs would be lessened accordingly. As such, the several proposed alternatives could reflect these various levels of service, the need for which is informed by various user expectations.

Importantly, MRNP should determine the most efficient and effective ways to fulfill these expectations once they are adequately determined. As it currently stands, the *Analysis* provides no data to support its representation of public expectations, and does not analyze various ways that these purported expectations could be met. All the *Analysis* provides is a statement of need for services based on presumptive public expectations—both of which appear largely unsupported. Moreover, the *Analysis*

---

<sup>[1]</sup> These fees appear to actually be more equitable because they apply to all visitors that pass a certain elevation and do not single out climbers.

provides no real outline of how the various alternatives could meet these supposed alternatives. The *Analysis* should provide a hierarchy of needed services (identified through methodical surveying), and then analyze a range of alternatives each of which could fulfill these services to various degrees depending on the hierarchical level. These alternatives, in turn, would reflect a range of fees.

Implementing a 100% fee increase is not a progressive management direction for MRNP given that it has not provided adequate justification supporting what the public wants, how much various services cost, and whether MRNP could simply be more efficient and effective with what it already has in terms of operating funds. After that analysis, only then should MRNP look at increasing fees for mountaineers.

### **Degree of Fee Increase**

The *Cost Recovery Proposal* fails to justify not only an increase, but also the dramatic degree to which fees will be increased. The *Analysis* states that “[b]ecause of the increased costs of doing business, personnel, flight time, supplies, materials, equipment, and training, the amount currently collected does not meet the needs to effectively manage the current mountaineering program.” However, the *Cost Recovery Proposal* and *Analysis* provide no details regarding cost recovery for the current mountaineering program.

Current accounting of the mountaineering program is critical for the public to evaluate how the program is currently run, whether fees should be increased, and if so, to what level. Instead, the *Cost Recovery Proposal* would increase fees 100% without any indication as to whether the cost of running the current program could be lessened through elimination of some portions of the current program, and/or run more efficiently. Further, the *Cost Recovery Proposal* should inform the public exactly how much any desired new services would cost so that this amount can be factored into the *Analysis* to justify such a dramatic fee increase.

Each item within the *Analysis* should include a cost component so that the public knows, and can meaningfully evaluate, the costs of providing staffing, climber safety and information, resource protection, human waste management, upper mountain rescue, program administration, and other incidental responsibilities. Rather, the *Analysis* merely provides data indicating that the “2002 mountaineering program costs were \$260,000. \$151,320 was collected in 2002 through the mountaineering cost recovery fees (9,083 were individual permits, 603 were annual permits).” This level of detail is inadequate. First, the public should know exactly what the program cost, not a number rounded off to the nearest \$10,000 dollar mark! Secondly, doubling the current fee would put the total collection at over \$300,000—given probably only a slight increase in visitor use, total revenues would result in a \$40,000 profit. If MRNP incurs a profit then it appears that a 100% fee increase is unwarranted.

## Specialized Services

Without more specificity in the *Analysis*, it seems that much of the proposed fee increase would go towards providing specialized—but unnecessary—services. While many of these services seem reasonable and necessary (such as clean and sanitary high camp toilets, and fast and efficient EMS and SAR response), many of these services have significant associated costs and appear beyond the scope of what the NPS needs to provide to the public.

The *Analysis* is confusing and conclusory because it mixes current and proposed services, yet fails to place a specific dollar amount on them. For example (if I understand MRNP's data), the current Mount Rainier climbing program does not cover SAR, so this should not be factored into the *Analysis*. Will the fee increase cover SAR? Further, the *Analysis* fails to indicate what portion of the costs are directly attributed to human waste removal. Because waste removal is expensive, it is critical that the *Analysis* identify this specific cost if it is being used to justify the fee increase. Both of these points reflect problematic accounting issues in the *Analysis* that limit meaningful public comment. Many of the proposed services are of dubious cost-benefit, such as “trip planning and preparation resources” and “professional climbing rangers to answer questions and make recommendations on routes, hazards, and general mountaineering.” There exist many professional guides and guide books that adequately provide this information. While MRNP should provide basic information as to tools and conditions, the NPS should not be in the business of guiding visitors on the mountain.

Many of the other services proposed in the *Analysis* can be easily obtained elsewhere (a guide of Mount Rainier has been published by a MRNP climbing ranger). Moreover, weather forecasts, avalanche forecasts, and snow pack data are available from other sources. While most climbers would welcome some of the suggested services, when faced with a 100% fee increase many of these same climbers would rather plan their own adventure. The Access Fund supports providing as many of the proposed informational and administrative services through an Internet web page.

-

## SUMMARY

It is clear that mountaineering use of Mount Rainier is on the increase and that MRNP needs to adjust the climbing program to both meet the needs of mountaineers and the fragile alpine resource. From the *Analysis*, it appears that most of the proposed fee increase would go towards specialized visitor services rather than protection of natural resources. The NPS should look harder at the largely unsupported public expectations and evaluate whether some of these specialized services are warranted. As noted above, there are innovative ways for the NPS to maximize existing information sources while providing additional information through private enterprise, other existing facilities, and low cost technology.

MRNP should view this proposed fee increase in the context of the entire region. There already exists a multi-faceted fee regime that covers most of the volcanoes in the Pacific Northwest, and the local population is already struggling to afford these costs so to recreate in their own back yards. NPS, USFS, state of WA, and state of OR should work together to coordinate fees, practices, and services.

The Access Fund supports a more gradual increase in use fees to meet the needs of the MRNP climbing program. The need for even this gradual increase, however, should be better-identified and well-documented. Such fees should not be surmised through MRNP's desire to provide specialized services that would effectively freeze out low-income users. Alternative #2 best reflects this more reasoned gradual approach if the NPS can justify any fee increase at all.

\* \* \*

Thank you for the opportunity to provide comments to this important and precedential management initiative. Mount Rainier is one of this country's great mountaineering objectives. Let's keep it financially accessible to everyone.

Sincerely,

Jason Keith  
Policy Director  
The Access Fund