



September 14, 2021

Greg Dudgeon, Superintendent
Mount Rainier National Park
55210 328th Avenue East
Ashford, WA 98304

RE: Visitor Use Management Plan for the Nisqually to Paradise Road Corridor – Summer 2021 Civic Engagement

Dear Superintendent Dudgeon,

Thank you for the opportunity to participate in Mt. Rainier National Park's Nisqually Corridor planning process. We appreciate the Park's continued public engagement process and the opportunity to provide comments during the second phase of the planning process. Our 14,000 members regularly engage in outdoor recreation in Mt. Rainier National Park (the "Park" or "MNRP") and other public lands throughout the Pacific Northwest.

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is "to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond." The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,600 skilled volunteers lead 3,200 outdoor education trips and courses annually for 14,000 members. Our youth programs provide over 10,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

For over 100 years, Mountaineers members have cherished the natural beauty and challenges offered by the Mt. Rainer landscape. As you may know, The Mountaineers helped build the original Wonderland Trail and made the first trek around the mountain in 1915. We advocated for setting aside wilderness areas within the park and fought proposals in the 1950s to heavily develop the Paradise area. Mountaineers Books has published a number of books on Mt. Rainier National Park, including the popular *Day Hiking: Mount Rainier*, *Hiking the Wonderland Trail*, and *Mount Rainier: A Climbing Guide*. The Mountaineers considers the Park one of the most significant gems of the Pacific Northwest and greatly values its world-class opportunities for backcountry recreation. Our members visit the Park often, through both Mountaineers youth and adult programming and personal trips, for activities such as day hiking, backpacking, scrambling, snowshoeing, climbing, and backcountry skiing. The Paradise area in particular is a tremendous and unparalleled outdoor education resource for The Mountaineers due to the opportunities it provides for high-altitude climbing, backcountry skiing, and snow skills practice like crevasse rescue and avalanche training.



We are also grateful for our longstanding, strong relationships with Park staff and leadership. Thank you again for the opportunity to provide questions and feedback on potential management strategies.

What questions do you have about these ideas (reservations, trip planning, shuttles, etc.)?

Shuttles: Should the use of shuttles be considered for the Park's Nisqually to Paradise corridor, would shuttle use be required for all visitors or would optional vehicle use continue in currently allowed areas? Would a shuttle system operate in all seasons? The nature, necessary gear, and varied duration of many of the activities our members engage in – especially those occurring during the winter season – would present many complications for our members if they were required to use a shuttle.

In addition, is the Park considering any shuttle options that would leave from near the Nisqually park entrance or Longmire? We are concerned that if a shuttle only ran from the Cougar Rock area to Paradise then it might not fully address the current road congestion and parking issues. Finally, would a shuttle be able accommodate users with special needs?

Paradise: If portions of the Paradise picnic area were converted to parking, how would the demand for picnic and gathering space be met in other ways? We are concerned that decreasing picnic areas at Paradise could result in increased use of informal gatherings off trail and negative impacts to meadow areas.

Does the Park plan to increase signage and visitor information for the winter months as well as summer months? It would be valuable both for the winter recreation experience and for safety purposes to share more information about safe winter travel, snowshoe trails by ability, and areas to avoid. We also encourage the Park to pursue strategies to reduce user conflict during the winter months, such as signing snowshoe routes and encouraging separation of snowshoe and backcountry ski/snowboard use.

What strategies does the Park propose to protect fragile meadows and vegetation? While this goal was outlined in the Summer 2020 Newsletter, the Summer 2021 Newsletter lacks specific strategies to better protect Paradise's meadows. We encourage the Park to prominently display information about proper trail etiquette, recreating responsibly and respectfully, and the importance of protecting the meadows.

Reservation System: Our biggest question about a reservation system is the impact on equitable access to the Mt. Rainier National Park and the impactful outdoor experiences it provides. A reservation system is likely to adversely impact people from underserved or rural communities, who may lack reliable and consistent access to the internet or a form of online payment to conduct the transaction. Would there be multiple methods for making reservations, including phone or "first come, first serve"? How would enforcement be handled for timed entry passes? If a reservation holder gets delayed because of traffic leading up to the Nisqually entrance of the Park, how would Park staff handle their access?

If a reservation system were instituted for places within the Nisqually to Paradise Corridor, would it allow for both individual and group registrations? How much time would each reservation have for



parking? How would overnight trips be handled? All of these details are important to Mountaineers trips and courses, which are group activities. It is critical for these groups to be able to secure a group reservation for the amount of time their activity requires, rather than requiring each individual to secure their own reservation. Many of our youth programs, which provide outdoor recreation and access to nature to groups that need them most, obtain special use permits from the Park. Would a special use permit automatically be paired with a group reservation?

Trip Planning: Our equity concerns extend to trip planning and status notification procedures. It can be easy to miss, or simply not be aware of, status advisories and notifications of winter gate openings and closings posted to the Park's Twitter account. These methods increase the likelihood of not reaching older and less tech-savvy members of The Mountaineers community. What tactics and procedures would the Park employ in order to educate the highest number of recreation users possible about current status and other important updates impacting recreation use in MRNP?

Winter Use: What winter recreational opportunities would be made available by opening the road segment between Longmire and Cougar Rock on days when the road to Paradise does not open? While we support increased winter access at MRNP, this particular area does not seem to offer a marked increase in recreation opportunities. Is the Park planning to consider other strategies to manage winter use, such as increased investment in plowing and staffing or later gate closing times?

How would these ideas (reservations, trip planning, shuttles, etc.) influence your visit to Mount Rainier?

While our member experience is likely to be varied and informed by their individual circumstances, we have the following general comments:

Shuttles: A shuttle system could be an effective solution to peak season parking and road congestion. Many visitors may prefer to bypass long wait times at the park entrance and avoid parking challenges by taking a shuttle to their destination. However, The Mountaineers believes that such a shuttle system should not entirely replace the option for passenger vehicle parking within the Nisqually Corridor. As stated previously, the nature, necessary gear, and varied duration of many of the activities our members engage in – especially those occurring during the winter season – would present many complications for our members if they were required to use a shuttle. For example, weary climbers descending from Mount Rainier generally prefer to go directly to their cars rather than waiting in line for a shuttle. During the winter, it is even more important to preserve the option for passenger vehicle parking at Paradise. The majority of visitors leave at about the same time, creating a logistical challenge that would probably leave crowds of wet, tired people waiting to descend to Longmire.

Paradise: We would support limited amounts of new parking in the corridor, but would be concerned about losing picnic areas at Paradise. These amenities are an important complement to the trails in this area and a popular gathering place. Decreasing picnic areas at Paradise could result in increased use of informal gatherings off trail and negative impacts to meadow areas.



Reservation System: In order for a reservation system to work for Mountaineers programs, it would need to allow for group reservations, flexible entry/exit times, flexible visit duration, and overnight use. Many of our members utilize the Paradise area for backcountry activities that can vary in duration depending on conditions and many other factors.

Trip Planning: Access to robust trip planning tools and information are crucial to ensuring success of Mountaineers trips and outdoor education programs. Improved trip planning information and consistent, frequent communication is especially important during the winter months. Although winter operating conditions are often understandably out of the Park's control, late notice of gate closures or delayed openings are inconvenient for members traveling long distances to recreate at Paradise, and may require trips to be cancelled or held at other less desirable locations. Given these realities, improved trip planning resources and consistent communication are needed.

Winter Use: The Mountaineers encourages the Park to improve shoulder season and winter access. The majority of our use occurs during these periods, and we highly value year round access to the Nisqually Corridor. We would appreciate earlier notice of gate openings, increased investment in plowing and winter staffing, and longer winter hours when practicable.

What information do you think the planning team should consider when analyzing these strategies?

While analyzing the above outlined strategies, the planning team should consider what employing such strategies in the Nisqually to Paradise corridor would mean for other areas of MRNP. For example, would a reservation system in the Nisqually to Paradise Corridor just shift use to other equally as congested areas of the Park, such as Sunrise? We encourage the Park to consider the unintended consequences of these strategies.

This planning process offers an opportunity to consider the full suite of recreation opportunities provided in the Nisqually to Paradise Corridor. We encourage the planning team to consider developing opportunities such as trails of differing ability levels, ADA accessible trails, additional camping, and experiences that appeal to people from all cultural backgrounds.

Please also consider strategies to manage congestion outside of the Nisqually entrance to the Park, including off-site shuttle parking lots, connections to public transit opportunities, and partnerships with local agencies to create a "transit to trails" program similar to the Trailhead Direct program in King County.

What tools do you use to help plan your trip to Mount Rainier? How could these tools be improved, and where should this information be provided?

Mountaineers staff and volunteers who plan, organize, and execute outdoor education and recreation activities in MRNP utilize a variety of Park Service resources, resources produced within our organization such as our books and website pages, and resources from other local and regional outdoor education and recreation groups such as Washington Trails Association.



The Park's wilderness areas and unique natural features attract a diverse group of visitors of many backgrounds and abilities. Current online advisory tools and notification processes need improvement in order to better serve these diverse users. These improvements should include more language translations and accessible and easy to understand signage. This is especially important for newer or first time park visitors who might experience challenges navigating sudden changes to operating status or conditions within the Park.

Based on your desired experiences at Mount Rainier, which combination of these ideas do you think best achieve the purpose of the plan? Which do not, and why?

All of these strategies would likely impact Mountaineers programming in some way. The appropriate combination of solutions would largely depend on the goals of the plan, which could benefit from further clarification. Is the goal to simply relieve vehicle congestion in the Nisqually to Paradise Corridor or is it to also enhance recreational opportunities and protect wilderness values? As long as implementation of a shuttle and increased parking for personal vehicles didn't substantially change the natural landscape, wilderness experience, and recreational amenities of the corridor, these strategies could help achieve the plan's purpose.

Are there other ideas that should be considered and analyzed that are not already presented? What is missing, and why should it be considered?

While this planning process addresses the Nisqually Corridor, we encourage the Park to consider visitor experiences and congestion throughout Mount Rainier National Park. Addressing visitor needs and challenges in other areas of the Park will help reduce visitation pressure on the Nisqually Corridor. For example, improving access in the Carbon River and Mowich Lake areas, considering earlier openings of the White River/Sunrise entrance, and creating additional camping opportunities could help spread out visitation throughout the Park. Trip planning information that emphasizes lesser visited areas of the park and alternative destinations could also help disperse use. The Park may also consider employing a similar planning process in the Sunrise area, which experiences congestion like the Paradise area. We realize many of these proposals require additional resources but feel that they should be considered in order to get the best possible outcome.

What other comments or questions do you have?

We realize that many of these comments are informed by anecdotal information and we do not have the benefit of visitor use data. Providing stakeholders and the public with specific and targeted visitation data could result in better informed comments. We encourage the park to share this data as part of the planning process. We are also interested in whether the Park has established a framework for visitor capacity, both in the Nisqually Corridor and other areas of the Park.

We encourage expanding your solicitation of feedback beyond traditional park visitors and stakeholders to more directly encourage and consider perspectives of nontraditional park users and diverse communities.



**THE
MOUNTAINEERS**

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Thank you for the opportunity to comment, and for your service on behalf of the outdoor community.

Sincerely,

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