



THE MOUNTAINEERS



June 24, 2023

Superintendent Greg Dudgeon  
Mount Rainier National Park  
55210 238th Avenue East  
Ashford, WA 98304

**RE: Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment**

Dear Superintendent Dudgeon:

Thank you for the opportunity to provide comments on the Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment. Many of the undersigned organizations are long term partners of the park and represent users groups for whom Mount Rainier National Park is a beloved landscape.

The undersigned organizations have come together to share our perspectives and help the park take a thoughtful approach in managing the visitor experience, parking and congestion. We are concerned that the action alternatives in the draft plan will have negative impacts on visitor experiences at Mount Rainier. Our organizations support the broad goal of the planning process. The park states that, “the purpose of the Nisqually to Paradise Corridor management plan is to provide high-quality opportunities for visitors to safely use, experience, and enjoy the park and to develop strategies to concurrently protect natural and cultural resources”<sup>1</sup>. In our opinion, the preferred alternative, as well as alternative 3 and alternative 4, fail to achieve the stated goal. We ask that the planning team develop additional management actions to address our concerns.

The alternatives that the planning team is considering rely on either implementing an online reservation system to allocate a finite number of timed entry permits to provide access to park corridors or a mix of online reservations for specific parking areas and permits to enter park corridors. The inequitable effects of such systems are known to the park. The draft plan states:

---

<sup>1</sup> Draft Plan 1-5

A reservation system requires visitors to book their visit in advance, requires technological access to a website, and costs additional money. The extra costs (typically \$2–\$6 per vehicle reservation), knowledge of trip planning, and access to a computer or smart phone may be a barrier for some individuals from low-income and/or underserved populations. Therefore, implementation of this system could adversely impact visitor demographics and the ability of underrepresented communities to visit the park...<sup>2</sup>

Researchers who have studied reservations systems at other National Park sites have found that visitors to park facilities that require online reservations tend to be wealthier and are more likely to be white than at National Park sites that do not require advanced online reservations.<sup>3</sup> In a meeting on June 8th, 2023, the National Park Conservation Association asked a question about what steps Mount Rainier has taken to assure that any proposed new reservation system would not create new barriers that further restricted access to the park for low income families and people of color. Park leadership expressed that the planning team had not focused on avoiding unintended impacts to those communities and asked for assistance in better understanding the possible effects of Mount Rainier’s proposal. Our organizations foresee significant inequities in the proposed changes to park operations. We believe that the exclusionary effects of the preferred option have not been sufficiently analyzed.

There are already many existing barriers that make visiting iconic landscapes like Mount Rainier inequitable. We believe that the National Park Service should do more to make visiting parks accessible, and this proposal unfortunately does the opposite. Mount Rainier National Park’s 2002 general management plan includes other visitor use management strategies that the park has not implemented. These strategies, including adding shuttles, could address some of the park’s congestion concerns. Adding a robust bus system from gateway communities could allow new connections to transit systems, reduce climate impacts of visitation, increase the public’s ability to enjoy point-to-point hiking and improve visitor education. The park should center equity as a way to improve the overall park experience while meeting the needs of this planning effort.

At present, Mount Rainier National Park anticipates turning away visitors who arrive at entrance gates without reservations. Our organizations believe that under the currently proposed alternatives, park staff will deny entry to a disproportionate number of individuals and families who do not speak English fluently or experience other disadvantages in understanding the park’s restrictions. This outcome is a design flaw of all alternatives that do not allow visitors to enter the park when parking lots are at capacity.

Relying upon online reservations to regulate park visitation is not fair. Reservations are likely to be acquired by wealthier visitors with better access to technology. Wealthy individuals unfairly acquiring reservations is not an isolated phenomenon. Subscription services (such as campnab.com) currently allow users to pay to receive an advantage in acquiring reservations on Rec.gov, including acquiring campground permits at Mount Rainier. The draft plan does not demonstrate sufficient mitigations for these inequities, sufficiently address permit utilization rates, provide ideas for coordinating reservations for large groups or assure a welcoming experience to all park visitors. We ask Mount Rainier National Park staff to develop new strategies, such as a robust shuttle system, not currently in the draft plan to allow visitors without reservations to continue to enjoy the park’s most popular sites. To make a reservation system more equitable, we ask the park to consider: allocating a number of non-reservable (first come, first served) vehicle entry slots, using license plate numbers to distribute access across

---

<sup>2</sup> Draft Plan 3-11

<sup>3</sup> Rice, William L. “Exclusionary Effects of Campsite Allocation through Reservations in U.S. National Parks: Evidence from Mobile Device Location Data.” *Journal of Park and Recreation Administration*, vol. 40, no. 4, 2022, pp. 45–65, <https://doi.org/10.18666/jpra-2022-11392>.

different dates and working with local governments, schools and community groups on public education about any new protocols for park entry.

According to Park Service policy, visitor capacity is the “maximum amounts and types of visitor use that an area can accommodate while achieving and maintaining desired resource conditions”<sup>4</sup>. The planning team has suggested that parking is the limiting attribute to public enjoyment and cultural resource protection at Paradise and Sunrise. The draft plan states, “Trail conditions are acceptable and park operations are sustainable on days when all Paradise lots are full.”<sup>5</sup> Park resources may be maintaining desired conditions when parking lots are at capacity, but the draft plan gives no science-based justification for why the maximum amount of use that maintains resource conditions would be found at the exact level when current parking lot capacity is full. The park’s capacity should not be a function of current parking facilities. We ask that your analysis consider capacity with shuttles as is discussed in the general management plan.

Our organizations would like to see shuttle systems from both the Nisqually and White River entrances to accompany any reservation-based changes to park entry. We want people to be able to continue to experience Mount Rainier National Park without the impediments of a reservation system, and we believe that the “maximum amount and type of visitor use that an area can accommodate” is not the same as the number of people who can ride private vehicles to popular areas in the park. If a comprehensive transportation system is not currently feasible, we believe the plan should identify partnership agreements and additional resources needed to create such a shuttle system. If the plan provided this information, groups like ours would have a greater ability to help the park address the genuine challenges that come from stewarding such a special landscape.

Thank you for considering our input. We look forward to continuing to work with you. Please continue to engage with our organizations in this planning process and seek our input when determining the implementation of visitor use management actions. Our organizations believe in the park’s ability to provide outstanding visitor experiences and protect natural and cultural resources. Let’s work together to assure that the park does not alleviate congestion by further restricting access to individuals and families who already experience significant barriers to enjoying Mount Rainier National Park.

Sincerely,

Michael DeCramer  
Policy and Planning Manager  
Washington Trails Association

Ashleigh Shoecraft  
Executive Director  
Braided Seeds

Chevon Powell  
Founder  
Golden Bricks Events

Ty Tyler  
Stewardship Director  
Access Fund

Betsy Robblee  
Conservation & Advocacy  
Director, The Mountaineers

Kyle McCrohan  
President  
Cascade Backcountry Alliance

Hilary Eisen  
Policy Director  
Winter Wildlands Alliance

Luis Villa  
Executive Director  
Latino Outdoors

Eric Thornburg  
Scoutmaster  
BoyScout Troop 71,  
Steilacoom, WA

Scott Hicke  
Director of Development  
Rainier Prep Public Charter School

King County Play  
Equity Coalition

---

<sup>4</sup> Interagency Visitor Capacity Guidebook, 15

<sup>5</sup> Draft Plan, C-27