

June 26, 2023

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

RE: The Mountaineers comments on the Mount Rainier National Park Draft Nisqually to Paradise Corridor Management Plan and Environmental Assessment

Dear Superintendent Dudgeon,

Thank you for the opportunity to submit comments on the *Mount Rainier National Park Draft Nisqually to Paradise Corridor Management Plan and Environmental Assessment* (the plan). Our 16,000 members regularly engage in active outdoor recreation in Mount 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. 1,200 skilled volunteers lead 3,200 outdoor education trips and courses annually for 16,000 members. Our youth programs provide over 15,000 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. 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, mountaineering, 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. Please refer to our comment letter of October 5, 2020 for more details of how our members use MRNP through outdoor education courses and trips.

We are also grateful for our longstanding, strong relationships with Park staff and leadership. We appreciate the Park's willingness to meet regularly with our conservation and programs staff to discuss issues of importance to our community. Many of our members participate in active stewardship of MRNP, either through the Meadow Rovers program or Washington Trails Association volunteer trail



maintenance. Our community advocates for robust funding and resources for the National Park Service to protect our special places and the outdoor experience.

The Mountaineers participated in the scoping for this project and submitted comment letters in 2020 and 2021. We have thoroughly reviewed the draft plan and analyzed its effects on our programs and the outdoor experience. We are concerned that timed-entry reservations would make it more challenging and burdensome for our programs to access the park for courses and trips. Given that Mount Rainier is an unparalleled outdoor education resource, this would hinder our ability to fulfill our mission and connect people to the natural world. We also have concerns with the unintended effects of the plan on underserved communities. While we understand the need to address congestion and better protect natural resources, we believe significant changes are necessary before finalizing this plan. We urge the Park to create a new alternative and address our concerns with the draft plan, as provided below.

Purpose and Need

The Mountaineers agrees with the purpose of the Nisqually to Paradise Draft Corridor Management Plan, "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." We understand the management challenges faced by the Park and agree with the Park's goal of providing high quality visitor experiences while protecting resources.

Our analysis of the draft plan causes us to question the need for the plan. First, the draft plan shares summer visitation to Mount Rainier from 2011-2021 and draws the conclusion that "the plan is needed to address a wide range of issues associated with congestion and facility overuse." We encourage the Park to include visitation data from prior to 2011, which shows that the Park experienced similar levels of visitation in the 1970s and 1980s. That data calls into question the need for the plan: why is the plan needed now if visitation has fluctuated between lower and higher levels than current trends over the past 50 years?

Second, as we go into more detail in the "Indicators, Thresholds, and Visitor Capacities" section of our letter, the draft plan draws questionable connections between the visitor capacity analysis and proposed management tools. Moreover, elements of the visitor capacity analysis are based on inadequate data. This causes us to question whether the plan is needed to achieve its purposes, as we describe more fully in the next section.

Indicators, Thresholds, and Visitor Capacities

¹ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, 1-5.

² Ihid

³ Mount Rainier National Park website, "Annual Visitation 1967-Present,

https://www.nps.gov/mora/learn/management/annual-visitation.htm



The Mountaineers has several concerns both with the data used to develop indicators and thresholds, and the conclusions drawn by the planning team in developing visitor capacity and therefore management actions. Given that the analysis of indicators, thresholds, and visitor capacity underpins the suggested management strategies and action alternatives, it is critical to fully consider whether this analysis truly justifies the proposed action alternatives. In our view, it does not.

We strongly encourage the National Park Service to revisit the planning team's analysis of indicators, thresholds, and visitor capacity and address its shortcomings. We urge the planning team to reconsider whether the proposed management actions follow from their own analysis. We especially request the planning team to ensure its visitor capacity analysis is based on the capacity of the destination and its desired conditions without regard for private vehicle parking. In order for the final plan to be successful, partners and stakeholders must be confident that the plan is justified by a well-reasoned visitor capacity analysis.

Nisqually to Paradise Corridor

The planning team determined that 9 out of the 13 analysis area locations are maintaining desired conditions. According to the planning team's analysis, Comet Falls Trailhead, Paradise (summer), Paradise (winter), and Sunrise are not consistently maintaining desired conditions. If 9 out of 12 (excluding Sunrise) locations along the Nisqually to Paradise corridor are currently maintaining desired conditions, we question the need for the Park's preferred alternative, Alternative 2, which would manage access to all 12 locations along the corridor.

<u>Paradise</u>

Regarding Paradise in particular, the draft plan notes that weekend use is close to double weekday use.⁵ If, for example, we consider peak weekend use is "approximately 4,320 people at one time in Paradise,"⁶ then peak weekday use could be 2,160 people at one time in Paradise. This number is below the visitor capacity of Paradise in all action alternatives. Therefore, we question the need for timed-entry reservations on weekdays during peak season.

Appendix C concludes that "the limiting attributes for visitor use at Paradise during the summer are the social and resource conditions on the Paradise Meadow trails." However, the analysis in Appendix B of the percentage of bare ground indicator shows that this indicator is actually improving, from "6.7% of the total area within 16 feet of any trail edge impacted by off-trail use" in the 1989 Rochefort et al. inventory to "4.6% of trail-adjacent areas" estimated to be bare ground today. Regarding the social

⁴ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, 2-14, Table 2.

⁵ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, C-24.

⁶ Ibid.

⁷ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, C-27.

^{8 2023} Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, B-7.

⁹ Ibid.



conditions of the Paradise Meadow trails, Appendix C shares surveys in Mount Rainier and other parks that conclude that "visitors are more concerned with being able to access and experience Paradise through self-guided trails and less concerned about the number of people on trails" and "when presented with tradeoffs, visitors are minimally concerned with a high number of people on the trail." The planning team's own analysis of the social and resource conditions on the Paradise Meadows trails calls into question the conclusions drawn for the limiting attributes and visitor capacity.

Incidentally, we note that under the Indicator Topic: Bare Ground, the draft plan states that the indicator is "percent of bare ground adjacent to trails (within 6.4 feet [5 meters]) of maintained trail edge." We believe there is a typo in converting meters to feet: in reading the rationale, it seems clear that the correct metric is 5 meters, which is 16.4 feet, not 6.4 feet.

The planning team draws further conclusions about the conditions of Paradise based on faulty assumptions. The planning team asserts that:

"Trail conditions are acceptable and park operations are sustainable on days when all Paradise lots are full. Based on available data, studies, and park staff observations, if this level of use were to prevail, it could be sustained without impacting resources or experiences in the area of the park." ¹³

In determining the visitor capacity for Paradise, the Park has interpreted capacity to be a function of parking infrastructure. This is clearly demonstrated in Table 2. Proposed Visitor Capacities by Analysis Area Location. The capacity of Paradise is said to be either 2,520 people, 2,500 people, or 2,200 people depending on the action alternative selected. This fluctuation in capacity is not a function of "the social and resource conditions on the Paradise Meadow trails," instead it is a function of the capacity of the parking infrastructure. Capacity connected to resource concerns should be expressed as a range of visitation levels that more closely connects overall visitation to desired conditions. Instead the planning team has simplified their analysis and derived capacity based on a limiting attribute of parking. This limiting factor could be ameliorated by a shuttle system from a nearby location outside of MRNP, such as Ashford.

With regards to the winter visitor capacity at Paradise, the planning team identified the limited attribute as "the need to maintain a primitive snow camping experience unimpeded by other visitors." We question this as a limiting attribute since snow camping is limited by the wilderness permit system, the majority of the snow camping experience takes place overnight when day users are not present, and the

¹⁰ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, C-26.

¹¹ Ibid.

¹² 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, B-7.

¹³ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, C-27.

¹⁴ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, 2-14, Table 2.

¹⁵ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, C-27.

¹⁶ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, C-29.



draft plan does not give any data on the number of snow campers. Again, we question if the limiting attribute for winter visitor capacity at Paradise is indeed snow camping or if, again, the parking infrastructure and ability to manage winter visitation are the more influential factors. We encourage the Park to reassess the need to decrease use levels in the winter season.

Mount Rainier National Park has a statutory mandate to both protect its resources and allow the public to enjoy the outstanding qualities for which it was created. All actions taken in the name of resource protection must actually improve conditions on the ground. Restricting use to meet parking capacity or current staffing levels does not meet the legislative intent for which the Park was created.

Sunrise

The stated limiting factor in the Sunrise corridor is roadway congestion leading to the entrance station. Again, the planning team is deriving capacity based on a limiting attribute of the transportation system. This limiting factor could be ameliorated by a shuttle system from a nearby location outside of the Park, such as Crystal Mountain.

Furthermore, it appears as if the Park has not yet established current and desired conditions for Sunrise, perhaps due to the late addition of the Sunrise area to the plan. We are concerned that the Park has developed management tools for the Sunrise area without first establishing current and desired conditions. This is not consistent with the Interagency Visitor Use Management Council (IVUMC) Visitor Use Management Framework and causes us to question the visitor capacity determinations and resulting management tools for the Sunrise area. We encourage the Park to complete this analysis prior to finalizing the plan.

Reservation Systems

The plan does not address several significant issues in implementation and ongoing management of a timed-entry reservation system. These issues are applicable across all action alternatives and will impact key resources analyzed in the draft plan: visitor use and experience and socioeconomics. We urge the Park to conduct significant public outreach to stakeholders like The Mountaineers and other affected communities as it finalizes its design of any system. We strongly encourage the Park to consider the following concerns and address them in the final plan:

Group Reservations

We understand that under the draft plan, Mountaineers courses and trips that require permits such as special use, climbing, wilderness, or camping permits would not be required to obtain separate timedentry reservations. However, the majority of Mountaineers programs, which are one-day trips of under 25 persons, would be required to obtain timed-entry reservations just like the general public.



Currently, the draft plan is centered around vehicle reservations, and is silent on whether group reservations would be allowed. Without a group reservation option, every vehicle on a Mountaineers trip would need to have the same timed-entry reservation window. Some possible outcomes of the draft plan are:

- Mountaineers leaders would have to list trips on our website months in advance to ensure the best chance of all vehicles synchronizing timed-entry reservations.
- Leaders might feel the need to cap the trip capacity at a single car-load unless or until an assistant leader or participant confirms that they have a timed-entry reservation for the same time.
- Drivers might need to be pre-assigned, and because our trips start and stop at the trailhead, this may raise insurance and liability challenges.
- If the holder of a timed-entry reservation cancels on a trip, finding a replacement might be impossible.
- Mount Rainier National Park would no longer be a viable alternative destination during wildfire season if the original trip destination was affected by wildfire closures and/or wildfire smoke.

Any timed-entry reservation system must allow for the ability to secure group reservations. Without the ability to make group reservations, the plan would have the unintended consequence of limiting opportunities for learning outdoor skills and safety techniques. As one Mountaineers leader shared with us, "More than anything, [the plan] would reduce the number of trips offered, as leaders would likely determine that some potential trips are not worth the effort of going through the red tape of the reservation system."

The ability to secure group reservations is necessary not just for The Mountaineers, but for other non-profit organizations, community groups, affinity groups, and large families. Group reservations are critical to ensure equitable access to the outdoors. Many people are first introduced to the outdoors through facilitated outdoor experiences, such as The Mountaineers, the YMCA, or other programs that provide services for underserved communities. Other people simply feel more comfortable accessing public lands as part of a group.

Park leadership has shared that there may be unintended consequences with allowing for group reservations, such as the reselling of reservations. While this is a concern, we are confident that the Park can implement controls to prevent this situation from occurring. The potential for unintended consequences should not preclude the ability for groups like The Mountaineers to teach outdoor skills and introduce people to the outdoors.

Time Frames for Reservations

Visitation to Mount Rainier is highly dependent on weather and conditions. Especially for activities such as alpine climbing, scrambling, and snow activities, the decision to visit the Park is made days or even hours prior to a trip. We encourage the Park to make timed-entry reservations available for short-term as well as long-term purchase. Visitors should have a variety of options to secure reservations months,



several weeks, one week, several days, and one day prior to a visit, as well as on the day of a visit. They should also be able to easily cancel and rebook a reservation. A generous cancellation policy would have the added benefit of opening up availability for other users.

Mount Rainier is unique among national park units in that it is near the Puget Sound metropolitan area. A substantial number of visitors are local and cherish the ability to visit the park spontaneously and regularly. This makes the Park different from other parks with reservation systems, such as Glacier or Arches National Park, which are remote and require more planning to visit. To preserve the ability for local residents and visitors alike to visit the Park spontaneously, we suggest that the Park consider revising the time window for timed-entry reservations to 8am to 3pm. This would allow more flexibility for visitors to arrive at the Park early and visit later in the day for an afternoon hike, picnic, or scenic drive.

Climbing and Wilderness Permits

The draft plan states that visitors with a climbing or wilderness permit would not have to obtain a separate park entrance reservation. However, it is unclear whether a visitor must also make a separate reservation to enter the park in advance to pick up their permit in person. We believe that leaders who have secured a permit ahead of time should be allowed a window of admission to pick up their permit and speak with a ranger. Alternatively, this could be done by phone or virtually.

According to the plan, visitors seeking walk-up climbing and wilderness permits would need a timedentry reservation - a "permit for a permit." This adds yet another administrative hurdle for a Mountaineers leader trying to plan a trip, especially when looking to Mount Rainier National Park destinations as an alternative location for a trip affected by adverse conditions elsewhere. The plan should allow for the ability to obtain walk-up permits without needing a separate timed-entry reservation, either in-person outside the park, by phone, or virtually. We encourage the Park to implement actions from the 2002 General Management Plan, such as staffing visitor welcome centers operated outside of the park.¹⁷

Equitable Access

As the draft plan itself states, "A reservation system requires visitors to book their visit in advance, requires technological access to a website, and costs additional money." The Mountaineers is concerned that a reservation system could create barriers to access for people who don't have easy access to technology, don't speak fluent English, have unpredictable work or family commitments that limit their ability to plan ahead, or are new to visiting public lands. While these barriers affect all kinds of people, they disproportionately affect people from low-income, underserved, and rural communities.

¹⁷ 2002 Mount Rainier General Management Plan, p.73.

¹⁸ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, 3-11.



Researchers who have studied reservation 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.¹⁹ We are concerned that the exclusionary effects of a timed-entry reservation system has not been sufficiently analyzed.

The Mountaineers believes that all people should have the opportunity to access and find belonging in the outdoors. This starts with reducing barriers and creating welcoming spaces. There are already many existing barriers to visiting public lands: the cost of gear and passes, need for transportation, need for time off, etc. A timed-entry reservation system makes something that is already inequitable more so. It also increases the perception that the park is only accessible to certain types of people.

More research and targeted community engagement is needed to understand how perceptions of visitor use management systems affect the intention to visit, and more research is needed to inform best practices and resources needed for making communication about visitor use management available in a multitude of languages and cultural communication contexts.

We urge the Park to give more serious consideration to strategies raised in this comment letter, such as shuttles, same-day reservations, group reservations, making reservations available by phone, and information in multiple languages. While it is challenging to design a plan that meets the needs of all visitors, the Park should center equity as a way to improve the overall park experience while addressing issues caused by congestion and crowding.

Unintended Consequences

The design of any timed-entry reservation system must allow for anticipated multiple-bookings, noshows, and technological advantages. We have heard anecdotally from community members who have experience with similar systems at other National Parks that wealthy and/or frequent visitors can be expected to acquire weekend permits for a myriad of dates with the intention of only utilizing their reservation if the weather is pleasant. If reservation fees are low and there is no penalty for no-shows, one can only expect such practices to occur at Mount Rainier National Park. Subscription services (such as campnab.com) also currently allow users to pay to receive an advantage in acquiring reservations on recreation.gov, including acquiring campground permits at Mount Rainier. The draft plan does not demonstrate sufficient mitigations for these unintended consequences of a reservation system.

Additional Comments

Shuttle System

¹⁹ 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.



The Mountaineers is disappointed to see that a shuttle service from Ashford or other gateways was considered but dismissed. We believe a shuttle system in both the Paradise and White River corridors would meet the purpose and need of the plan by improving visitor experience and reducing congestion. We urge the Park to reconsider their decision and work with local communities, partners, and businesses to establish a comprehensive shuttle system.

A comprehensive shuttle system is a core component of the park's long-term visitor use management planning. The 2002 General Management Plan calls for MRNP to establish a shuttle system "in cooperation with communities and regional authorities" as part of efforts to address congestion. The existing management direction remains well reasoned, especially in combination with a parking reservation system. A reservation system provides an incentive for shuttle use and a management tool to ensure its success.

The draft plan dismissed this idea "because it would not be able to be implemented within the park's existing land allocation and decision authority." This determination is flawed. The Park has the ability to enter into agreements and partnerships with government agencies and businesses that could create options for creating necessary facilities outside of the Park. The Park suggests that visitors prefer to use private vehicles to access the Park and there is insufficient demand for a shuttle from gateway communities. This claim lacks sufficient data and fails to account for how a reservation system would shift demand.

The time is right to reconsider shuttle service. Shuttle systems are increasingly common and accepted at national parks, including Zion, Denali, Acadia, and Glacier National Parks. They offer an opportunity to park outside of sensitive areas and increase opportunities for quality visitor experiences, visitor education and interpretation, and better use patterns. A robust shuttle system from gateway communities could also allow new connections to transit systems and reduce climate impacts of visitation.

The planning team should develop a new alternative that meets the intent of the 2002 GMP and the purpose and need of this plan. Combined with a timed-entry reservation system and with appropriate management of shuttle capacity, a comprehensive shuttle system can improve visitor experience and reduce congestion without exceeding visitor capacity.

<u>Displacement</u>

We appreciate the inclusion of the Sunrise area in the draft plan, as we suggested in our September 14, 2021 letter, because a reservation system in the Nisqually to Paradise Corridor would shift use to other areas of the Park. Now that a reservation system is under consideration for the Nisqually, Stevens

²⁰ 2002 GMP, Summary X.

²¹ 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, D-1.



Canyon, and White River entrances, we are concerned that spontaneous use will be displaced to more sensitive areas such as the Mowich Lake area and neighboring U.S. Forest Service lands.

The Mowich Lake area is increasing in popularity, due to spectacular hikes like Spray Park and Tolmie Peak. The area is experiencing issues such as parking along the roadside, roadway congestion and conflicts, meadow impacts, social trails, and wildlife impacts. The plan seeks to reduce congestion on the Paradise and Sunrise trails, many of which are paved or well-built to accommodate high use, while potentially increasing congestion in the fragile alpine meadows of Spray Park, which are not built to accommodate high use.

As the draft plan states, "considering the impacts of managed access outside of the corridor is important because when access is managed in one area of a park, the issues of crowding may be displaced to different areas of the park."²² The plan must consider whether reducing spontaneous access to places like Paradise and Sunrise will push visitors to other nearby areas that lack the infrastructure - or where existing infrastructure lacks the durability - to accommodate higher use. If and where such displacement is anticipated, the Park should include mitigation measures in the final plan.

<u>Implementation</u>

The changes proposed by Mount Rainier National Park will have wide-ranging effects on the public's ability to experience the park, and we believe the draft plan needs significant revisions and substantially more public input to avoid unintended negative impacts on communities. In taking public comment on this plan, NPS conducted only one online event to discuss the plan and take questions. We encourage the Park to conduct additional public meetings, including in-person meetings. While we appreciated the opportunity to ask the Park questions about the draft plan at a June 8, 2023 meeting, we encourage the Park to conduct proactive outreach to affected communities, especially underserved communities.

The implementation of the final plan should also be informed by robust public outreach. Significantly more public outreach and education will be needed to ensure that this plan is well understood. Public educational information should be made available in multiple languages and formats.

While the draft plan mentions several times that implementation will be adaptively managed, we strongly encourage implementation to be incremental and informed by careful monitoring. If a reservation system moves forward, we encourage the Park to conduct monitoring to study public opinion of the reservation system on visitor experience. This should include both people who use the reservation system and those who choose not to or are not able to secure a reservation. The Park should also monitor whether reservations affect the racial and socioeconomic diversity of visitors to the park.

Our Recommendations

²² 2023 Nisqually to Paradise Draft Corridor Management Plan and Environmental Assessment, 1-4.



Again, we deeply appreciate our longstanding, strong relationship with Park leadership and your stewardship of Mount Rainier's natural resources and outdoor recreation opportunities. We appreciate the planning team's work to develop the draft plan and incorporate public feedback. These issues are challenging and the solutions are not easy.

The Mountaineers believes that the Park can achieve the purpose and need for this plan by developing a new action alternative that incorporates the following attributes:

- Revisit the planning team's analysis of indicators, thresholds, and visitor capacity and ensure that the proposed management actions follow from that analysis.
- Develop an alternative that includes shuttle systems from outside the Nisqually and White River entrances to accompany any reservation-based system.
- If a timed-entry reservation system moves forward, ensure that the system allows for:
 - Mitigation of entry barriers for underserved communities, including shuttles, same-day reservations, making reservations available by phone, and providing information in multiple languages;
 - The ability to make group reservations;
 - The ability to secure reservations on a short- and long-term basis, with generous cancellation policies; and
 - The ability to secure reserved and walk-up climbing and wilderness permits without needing a separate timed-entry reservation.
- Implement the final plan incrementally, with robust public feedback and careful monitoring of displacement, unintended consequences, and visitor experience.

Thank you for considering our input. We look forward to continuing to work with you to ensure that future generations can continue to experience the spectacular beauty of Mount Rainier National Park.

Sincerely,

Betsy Robblee

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