



August 11, 2025

Public Affairs Office
North Cascades National Park Service Complex
810 State Route 20
Sedro-Woolley, WA 98284

RE: Frontcountry and Visitor Use Plan for Ross Lake National Recreation Area and State Route 20 Corridor

comments submitted electronically through the PEPC comment portal

To North Cascades National Park Planning Team,

Thank you for the opportunity to submit comments on the Frontcountry and Visitor Use Plan for Ross Lake National Recreation Area and State Route 20 Corridor. Our community is deeply invested in the management of the North Cascades National Park Complex (the “Park” or “NCNP”) 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 17,000+ 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 North Cascades landscape. The Mountaineers considers the Park one of the most significant gems of the Pacific Northwest and greatly values its world-class opportunities for frontcountry and backcountry recreation. Our members visit NCNP and the State Route 20 (SR20) corridor often, through both Mountaineers youth and adult programming and personal trips, and for activities such as day hiking, backpacking, scrambling, snowshoeing, climbing, mountaineering, backcountry skiing, and kayaking. Our programs teach safe and responsible recreation skills, Leave No Trace practices, and encourage a stewardship ethic.

As one of the advocates for the creation of North Cascades National Park, The Mountaineers also places tremendous value on the Park’s natural and cultural resources. The Park conserves valuable habitat for threatened and endangered species and vast old-growth forests with high levels of biodiversity. The North Cascades ecosystem, which includes the Park, contains one of the largest areas of contiguous designated wilderness in the lower 48 states. The area currently known as North Cascades National Park



is also the ancestral homelands of Indigenous communities. Protecting Indigenous cultural lifeways and sacred sites is a crucial aspect of current and future management of the Park.

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 staff to discuss issues of importance to our community. Our community advocates for robust funding and resources for the National Park Service to protect our special places and the outdoor experience.

General Comments on the Visitor Use Planning Process

The Mountaineers commends the Park and the National Park Service (NPS) for initiating this visitor use planning process. We recognize and support the Park Service's efforts to conserve and manage this internationally significant landscape and encourage an approach that both protects natural and cultural resources and ensures robust opportunities for outdoor recreation. The Mountaineers has the following general comments on the Frontcountry and Visitor Use Plan for Ross Lake National Recreation Area (NRA) and State Route 20 (SR20) Corridor:

Park Purpose

Ross Lake NRA is the most accessible and visited part of the North Cascades National Park Service Complex. The majority of the park's trailheads, campgrounds, and visitor services are located in the SR20 corridor and as a result the area welcomes the vast majority of the Park's visitors. Indeed, Congress intended that the primary purpose of Ross Lake NRA is to provide for recreational use. The founding legislation for North Cascades National Park Complex states that Ross Lake NRA was created:

"...in order to provide for the public outdoor recreation use and enjoyment of portions of the Skagit River and Ross, Diablo, and Gorge Lakes, together with the surrounding lands, and for the conservation of the scenic, scientific, historic, and other values contributing to public enjoyment of such lands and waters..."

The 2012 General Management Plan ("GMP" or "Plan") recognizes congressional intent through envisioning Ross Lake NRA as a "gateway" with a greater level of development and facilities. The Plan's main focus is to:

"...manag[e] Ross Lake NRA as a gateway to millions of acres of wilderness, providing enhanced visitor opportunities along the North Cascades Highway, and making better use of facilities along that corridor, while ensuring the long-term stewardship of the surrounding North Cascades ecosystem and wilderness."

The Plan outlined opportunities to enhance recreation in Ross Lake NRA and the SR20 corridor through "the addition of limited new facilities, including day-hiking trails, reconfigured parking areas, and the modest expansion of overnight facilities and concessions." The Plan's management paradigm



emphasizes the suitability of concentrating visitation and impacts along the SR20 corridor while preserving the wilderness character of the vast majority of the Park.

The Mountaineers believes it is important for the Park to increase accessibility and maintain the ability to accommodate high levels of visitation in the frontcountry corridor, in keeping with congressional intent and current management direction. In planning for the future of the Ross Lake NRA and SR20 corridor, we encourage the Park to maximize opportunities for safe, accessible, appropriate, and high-quality outdoor recreation experiences, while ensuring the long-term stewardship of natural and cultural resources.

Planning Context

There are numerous challenges and opportunities for the Park to consider while initiating a planning process at this current moment. There is no doubt that visitation to Ross Lake NRA is increasing and will continue to increase. More people are seeking the physical and mental benefits of time outdoors, inspiration and joy from the majestic surroundings, and respite in the cold waters of the reservoirs. This demand will only increase with population growth, increased urbanization, and intensifying climate change. At the same time, the National Park Service is experiencing major budget constraints and staffing challenges. More frequent wildland fires and severe storms require additional Park resources and more resilient infrastructure. Finally, technological change and emerging recreational trends require the Park to employ creative and dynamic management techniques.

For all these reasons, we encourage the Park to be visionary, creative, and expansive in your planning for the future of this critical area. The Mountaineers believes that we should be investing in Park facilities to sustainably manage visitation growth, accommodate a variety of recreational activities, and ensure climate resilient infrastructure. It is imperative that the planning team is forward looking and unconstrained by the realities of the present moment.

This planning process is also occurring as Skagit City Light is in the process of relicensing the Skagit River Hydroelectric Project. We encourage the planning team to utilize resources developed as part of the relicensing project, such as “RA-01 Recreation Use and Facility Assessment Report” prepared by HDR Engineering, Inc for Seattle City Light in March 2023. This report provides valuable insights which should inform the Ross Lake NRA and SR20 corridor planning process. We also encourage the Park to share information about any anticipated impacts to recreational opportunities that may be caused by changes to the Skagit River Dams as part of the ongoing Federal Energy Regulatory Commission relicensing process.

Plan Area

According to the project website and story map, the plan area encompasses the developed areas of the North Cascades National Park Service Complex along the SR20 corridor through the Park and Ross Lake NRA. We ask that you clarify the exact geographic scope of the plan in future stages of the planning



process. It is not clear if the plan will include management actions that will impact other areas of the Park such as the Boston Basin and Cascade Pass area or adjacent federally managed lands.

If feasible in a Park Service-managed planning effort, The Mountaineers encourages the Park to broaden the scope of the plan area to include adjacent U.S. Forest Service frontcountry areas that access NCNP, such as the Cascade River Road and the SR20 corridor from the NRA boundary to Washington Pass. These areas are especially critical to The Mountaineers due to the high concentration of exemplary alpine climbing opportunities. We would welcome the opportunity to provide input on strategies to better manage the frontcountry areas that access these resources. Given the rarity of planning efforts like this, we strongly encourage the Park to collaborate with the U.S. Forest Service and include these surrounding areas in the current planning process.

Answers to Topic Questions

1. What experiences in Ross Lake National Recreation Area and along State Route 20 do you find most important?

Over the last two years, The Mountaineers has conducted approximately 210 trips for 1,300 participants to destinations accessed from the frontcountry area, including destinations accessed by Cascade River Road and SR20 east of the Park boundary. These trips include field trips for our scrambling, climbing, and day hiking courses; youth activities for our outdoor clubs; and member-organized activities like scrambling, alpine climbing, backcountry skiing, day hiking, canyoning, and kayaking. Popular destinations include Eldorado Peak, Sahale Peak, Mount Logan, Snowfield Peak, Cascade Pass and Sahale Arm, Ruby Mountain, Thunder Creek, Thornton Creek, Hidden Lake Lookout, and the Liberty Bell Group.

In particular, the Park's opportunities for alpine climbing are a tremendous and unparalleled outdoor education resource for The Mountaineers due to the ability to practice technical skills like glacier travel, traditional ("trad") rock climbing, and steep snow climbing. It would be difficult to find suitable alternatives for these activities, particularly for our intermediate and advanced students.

While our programs typically visit the Park primarily for backcountry and wilderness experiences, those opportunities are accessed using frontcountry areas and facilities like roadways, parking lots, trailheads, and visitor centers. Moreover, our general membership recreates within both the frontcountry and backcountry areas. Within the frontcountry areas in particular, they appreciate opportunities to access the lakes to cool off during the summer, accessible day hiking opportunities, reservable and walk-in camping opportunities, and interpretation of the Park's Indigenous history and natural resources.

2. What are park staff doing well and what would you like to see continued?

As detailed previously, The Mountaineers is grateful for our longstanding, strong relationship with NCNP staff and leadership. We appreciate your interest in improving the visitor experience and access to the



Park's iconic natural resources. Despite limited resources, NCNP staff keep trails well-maintained, help ensure the safety of hikers and climbers, and help educate and inform the public.

3. What issues most interfere with your ability to access and get the most out of your experiences in the park? What can park staff do to better address these barriers?

Some of the biggest issues reported by our volunteer leaders are challenges accessing backcountry permits. Many of our volunteer leaders and general members are experienced and frequent users of the Park. While it may make sense for first-time visitors to the Park (or those seeking walk up permits for the most popular destinations) to visit the Wilderness Information Center in person to pick up a reserved or walk up permit, it is inconvenient for experienced and frequent visitors to get their permit in person. Often our volunteer leaders need to make a separate trip to Marblemount to secure a walk up permit, even for a less popular area, adding significant time onto what is already a volunteer activity. The Park's pilot Good Stewards Program was a significant benefit to our leaders, but unfortunately we have heard that the program does not exist anymore. We encourage the Park to streamline the process of securing permits for frequent users who adhere to Park rules and regulations, adequately prepare for backcountry trips, and follow Leave No Trace principles.

Other issues raised by our volunteer leaders and members include the limited amount of first come, first serve camping, congested parking areas, limited water access opportunities, and a general lack of contact with Park staff conducting education and enforcement.

4. After familiarizing yourself with the potential strategies, what would improve your visit?

The Mountaineers is interested to learn more about and contribute to site specific strategies proposed at places like Gorge Lake Campground, Colonial Creek, Sourdough Trailhead, and elsewhere. We are appreciative of the Park's efforts to seek creative site specific solutions to address current issues. We hope that potential site specific strategies will be in line with the current general management plan's overall approach to Ross Lake NRA. Here is some specific feedback on the potential strategies outlined in the story map:

Parkwide Options: We strongly encourage the Park to improve accessibility as outlined in the story map. The "RA-01 Recreation Use and Facility Assessment Report" prepared for Seattle City Light found recreation facilities and trails to be generally inaccessible, highlighting the imperative to improve accessibility throughout the Park. We also support tools that provide visitors and travelers with up to date information. In addition, we hope that the plan continues to emphasize the importance of education for park visitors. The current management plan states, "Interactions with knowledgeable, uniformed staff will be widely available, particularly in frontcountry areas of Ross Lake NRA." This expectation of contact with park staff should be retained.

Shuttles: We highly encourage the Park to explore the idea of concessions- or partner-operated shuttles. A shuttle system could be a good way of improving public access and reducing vehicle congestion at



some locations. We also encourage the Park to consider ways to connect a shuttle system with public transit opportunities, to further reduce the carbon footprint of passenger vehicle traffic and increase access for underserved communities. The Mountaineers believes that shuttle systems should not entirely replace the option for passenger vehicle parking, especially along Cascade River Road. Many of our trips arrive at their parking destinations in the early morning hours when a shuttle system would most likely not be running, and may return to the parking lot long after a shuttle system would have stopped running.

Wilderness Information Center: For destinations accessed from Cascade River Road, it would not be convenient to drive to the North Cascades Visitor Center in Newhalem to pick up a permit. Moving the Wilderness Information Center from Marblemount to Newhalem would decrease accessibility for many members of our community. The Park also considered this proposal during development of the 2012 GMP and dismissed the action from further consideration. The concern at the time was related to the operational efficiency that would be lost by separating the public wilderness information function from other program functions, such as search and rescue. If the Park decides to go forward with the proposal to relocate the Wilderness Information Center, we encourage you to explain how search and rescue functions would not be impacted.

Camping Opportunities: We encourage the Park to consider the modest expansion of overnight facilities, in line with the 2012 GMP. More opportunities for walk-in campsites would benefit visitors who are unable to secure a camping reservation. We are encouraged to see the proposal to add opportunities for overnight van camping, since that is an opportunity that some members of our community would be interested in. The Mountaineers is supportive of any changes that may be necessary to protect cultural resources and offer Tribal members private spaces to gather.

Colonial Creek: We highly encourage the Park to establish an area specifically for day use, to meet the demand for water access and picnicking in this popular area. Given the high concentration of visitors, the Colonial Creek area could benefit from additional interpretation, education, and the presence of Park staff.

Sourdough Trail: The Mountaineers favors restoring the Sourdough Trail. This trail is an important recreational resource for summer hiking and winter snowshoeing, as it provides a steep climb to a scenic vista and access to Stetattle Ridge. In addition, removing trails is generally not aligned with the philosophy in the current management plan, which outlines the need to provide additional day hiking opportunities and “a modest expansion of trails to scenic vistas along the North Cascades Highway corridor.”

Ross Dam Trailhead: We encourage the Park to consider options to optimize the Ross Dam Trailhead, which receives heavy use in the summer months. Given that the trailhead is used by backcountry visitors and Ross Lake Resort guests parking for several days, day users, vehicles with trailers, and larger passenger vans and buses, the parking lot experiences a high level of inefficient parking and safety issues. The 2012 GMP includes a proposed design for a new parking configuration, and we encourage



the Park to consider this and other options.

5. What other ideas do you want park staff to consider?

As previously mentioned, the Park contains world-class opportunities for rock climbing, alpine climbing, and mountaineering. Ross Lake NRA, in particular, has a well-established climbing community presence, with existing Climbing Management Areas (CMAs) like Newhalem, Diablo Wall, and others serving as successful models for stewardship and low-impact recreation. The Park also contains several high-quality canyoning routes that are stewarded by a growing community of canyoners. The Park has previously recognized these legitimate uses through the 2012 General Management Plan and specific CMAs.

The plan should explicitly recognize rock climbing, mountaineering, and canyoning as “appropriate recreational activities,” consistent with the legislative intent for Ross Lake NRA. We also encourage the Park to include language and management provisions that facilitate continued access to existing climbing areas and create a pathway for climbing management planning across the Park. The Mountaineers and the climbing and canyoning communities are ready to work with Park staff to refine management strategies and ensure balanced access that protects natural and cultural resources.

Thank you for the opportunity to comment and for considering our input. We look forward to continuing to work with you as this process continues to ensure that future generations can continue to enjoy the wonders of the North Cascades.

Sincerely,

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