



October 7, 2025

Jason Gibson, Acting Associate Director for Interpretation, Education, and Volunteers
National Park Service
1849 C St., NW
Washington, DC 20240

RE: Docket NPS-2025-0037, Public Input Requested on Improving Visitor Services in National Parks

Submitted via: <https://www.regulations.gov/document/NPS-2025-0037-0001>

Dear Acting Associate Director Gibson,

Thank you for the opportunity to provide input on how the National Park Service can improve visitor services for all who enjoy our nation's public lands. Our community regularly engages in outdoor recreation in Washington's three national parks and is deeply invested in their management.

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.

Importance of National Parks to The Mountaineers

For over 100 years, Mountaineers members have cherished the natural beauty and opportunities for adventure offered by our nation's parks. Our members frequently visit national parks through courses, activities, and personal trips, engaging in 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.



In the last two years, Washington state's three national parks have hosted 1,455 Mountaineers trips, providing over 10,000 opportunities for Washington residents to experience the outdoors in a safe, responsible, and community-oriented environment. In Mount Rainier National Park, the Paradise area serves as a cornerstone field location for snowshoeing and mountaineering trips and courses teaching glacier travel skills. The rugged peaks of North Cascades National Park offer world-class opportunities for scrambling and alpine climbing. In Olympic National Park, the North Fork Skokomish River and Dosewallips River areas host dozens of backpacking and day hiking trips each year.

The Mountaineers make frequent use of national parks for our programs and is therefore deeply invested in their thoughtful management. How these landscapes are cared for directly shapes our ability to provide safe, meaningful, and sustainable experiences for our members and partners. We are grateful for our longstanding relationships with national park staff and leadership and we value the NPS'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 the parks and our community consistently advocates for robust funding and resources to support the Park Service's mission. We remain committed to working together to ensure these treasured places remain accessible and resilient for generations to come.

General Feedback on Visitor Use Management Strategies

As more Americans enjoy our magnificent national parks, the National Park Service must continue to provide high quality experiences while also protecting park resources. As the National Park Service considers new visitor use management strategies, we encourage the Park Service to continue to employ the Interagency Visitor Use Management Council (IVUMC) framework. The IVUMC Framework is a systematic and transparent process that uses data and public input to lead to defensible visitor use management strategies. In addition to employing the IVUMC Framework, we encourage the Park Service to engage local stakeholders and communities, employ a robust public process, and prioritize flexibility and accessibility.

Feedback on Visitor Use Management Strategies - Timed Entry

Several national parks across the country have begun to implement timed entry reservation systems to manage increased visitation and address crowding issues. In 2024, Mount Rainier National Park began piloting a timed entry program that requires reservations for vehicle access to the Nisqually corridor and Sunrise areas of the park. During the 2024 and 2025 seasons, this program created challenges for The Mountaineers courses and trips, reducing our ability to connect people with the natural world. The 90-day advance booking window proved



incompatible with many backcountry recreation activities that require flexible planning based on weather and conditions. While some leaders attempted day before reservations for more flexibility, they often struggled to secure access for their full groups, leading to cancellations and missed opportunities for outdoor instruction. Overall, our program capacity was reduced by roughly 500 participants in the Sunrise and Nisqually corridors during the first year of the pilot.

The Mountaineers recognizes the importance of addressing congestion and protecting park resources. As Mount Rainier and other parks consider timed entry systems as a way to manage visitor use, we respectfully offer the following concerns and recommendations:

1. Group Access: Mount Rainier's timed entry pilot disproportionately affects educational programs and facilitated trips that serve new and diverse user groups. While our leaders encourage carpooling, multiple vehicles are usually needed. Many of our trips were cancelled this summer because drivers could not secure the same timed entry window. We urge the park to create a group reservation option so that organized programs like ours can continue providing equitable access to the outdoors.
2. Congestion: Timed entry has not eliminated congestion and in some cases has created new choke points, including long lines at entrances and a surge of traffic after the 3pm cutoff. We recommend shifting Mount Rainier National Park's reservation window from 7am - 3pm to 9am - 5pm. This would reduce barriers during the quieter early hours while addressing heavy afternoon use. We also recommend expanding the two hour entry window to better distribute arrivals and ease back-ups.
3. Equity Barriers: The timed entry system creates barriers for people without reliable internet access and those who do not speak fluent English, have unpredictable work or family commitments that limit their ability to plan ahead, or are new to visiting public lands. If timed entry continues, these equity concerns will persist. However, the park can help reduce impacts by improving signage and public communication, including clear, multilingual information placed well before entrances. This would minimize confusion and reduce backups caused by visitors being turned away at the gate.

We strongly encourage Mount Rainier National Park to consider these adjustments and to explore more holistic visitor use strategies that protect park resources while ensuring all people, regardless of background, can access and enjoy this treasured landscape. As other parks across the country consider timed entry reservation systems, we encourage the Park Service to take these concerns into account.

Suggestion for Visitor Use Management - Shuttle Systems



Shuttle systems can be an excellent visitor use management strategy to address vehicle congestion and allow more people to experience our national parks. The Mountaineers recommends implementing a shuttle system as a visitor use management strategy to reduce congestion in both Mount Rainier and North Cascades National Parks. Shuttle service has been proposed in the *Draft Nisqually to Paradise Corridor Management Plan and Environmental Assessment* for Mount Rainier, as well as in North Cascades' *Frontcountry and Visitor Use Plan for Ross Lake National Recreation Area and the State Route 20 Corridor*.

We encourage the parks to work with local communities, partners, and businesses to establish a comprehensive system that would ease congestion at entrances, reduce parking challenges, and enhance visitor access. Shuttle systems are already in place at several national parks – including Zion, Denali, Acadia, and Glacier – where they have become widely accepted and valued. They allow visitors to park outside sensitive areas, support resource protection, and create opportunities for education, interpretation, and improved visitor flow.

Data collected from our community during Mount Rainier's timed entry pilot showed overwhelming support for a shuttle service, with many members believing it would address problems that timed entry has not. A robust shuttle system could improve visitor experience and reduce congestion without exceeding visitor capacity.

Impacts of Staffing Cuts

Since January of 2025, the National Park Service has lost more than 24% of its permanent workforce. A federal hiring freeze, coupled with reorganization and reduction-in-force plans, has slashed staffing levels, hindered seasonal hiring, and pushed remaining staff to their limits. Compounding years of chronic understaffing and underfunding, these cuts have resulted in closures and reduced hours, diminished maintenance and custodial services, and growing health and public safety concerns.

A recent Department of the Interior report¹ revealed that at least 90 national parks are facing staffing-related challenges – a number likely underreported as not all parks submitted data. The report detailed a wide range of impacts: shortened hours and closed attractions, unstaffed fee collection stations, cancelled educational programs like ranger talks and youth camps, and an expanding maintenance backlog leading to unsafe conditions and unsanitary facilities. Parks also reported reduced law-enforcement and emergency response capacity, with fewer rangers

¹ Eileen Sullivan, "How Trump Administration Cuts are Hurting National Parks," *The New York Times*, August 27, 2025, (<https://www.nytimes.com/2025/08/27/us/politics/trump-cuts-national-parks.html>).



available to patrol critical areas and key leadership vacancies that undermine search-and-rescue coordination.

These impacts are already being felt in Washington state. Mountaineers members have observed both maintenance issues and a lack of public-facing staff across the parks we frequent. In North Cascades National Park, the seasonal backcountry ranger staff has been cut by more than half due to the terminations, leaving only three rangers to cover the entire park's Wilderness zones. In Olympic National Park, the reduction of road crew staff threatens winter access to Hurricane Ridge, a popular destination for skiing and snowshoeing. At Mount Rainier National Park, deferred maintenance issues – from the indefinite closure of the Fairfax bridge to ongoing water system problems at Paradise – are piling up with fewer staff available to address them.

In order to keep our parks scenic, safe, and resilient for future generations, investment in staff is essential. Staff are the backbone of visitor services, public safety, and resource protection. We urge the National Park Service to use every tool within its authority to sustain staffing capacity and to clearly convey to Congress and the Administration the need to lift the hiring freeze, reverse harmful reorganization measures, and prohibit additional reductions in force. Parks are among our nation's greatest treasures, but they can only remain accessible and well cared for if they are adequately staffed.

Thank you for the opportunity to comment and 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 our country's national parks.

Sincerely,

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