



March 24, 2026

North Cascades National Park Service Complex
Attn: Planning Team
810 State Route 20
Sedro-Woolley, WA 98284

RE: Comments from the American Mountain Guides Association and The Mountaineers on the North Cascades National Park Frontcountry and Visitor Use Plan for Ross Lake National Recreation Area and State Route 20 Corridor

Dear Planning Team:

The American Mountain Guides Association (AMGA) and The Mountaineers appreciate the opportunity to provide additional comments on the North Cascades National Park Service Complex's (NOCA) Visitor-Use and Frontcountry Plan for the State Route 20 (SR-20) corridor between Marblemount and Washington Pass/Lone Fir. We appreciate the planning team's thoughtful outreach, including the March 2026 collaborators' session and the effort to share draft desired-conditions statements and visitor-use options. We also recognize the National Park Service (NPS) goal of improving on-the-ground conditions, offering a variety of recreational opportunities and enhancing visitor safety and accessibility along this world-class mountain corridor.

AMGA represents professional rock climbing and mountaineering guides who have long enjoyed and stewarded the North Cascades. The Mountaineers is a nonprofit outdoor education, conservation, and recreation organization whose volunteer leaders facilitate thousands of hiking, climbing, and mountaineering trips and courses each year throughout the Pacific Northwest. Together, our organizations represent professional guiding services and volunteer-led educational and recreation programs, both of which rely on safe, sustainable access to public lands. Many of our members live and work in nearby communities and maintain long-standing connections to the North Cascades landscape.

Our organizations share a commitment to protecting the area's natural and cultural values while ensuring that a spectrum of recreation opportunities remains available for current and future generations. These comments draw on our first-hand experience along the SR-20 corridor and build upon public feedback documented in the 2025 comment summary and the detailed letters submitted by The Washington Climbers Coalition (WCC), the Access Fund, AMGA, and The Mountaineers.

Overall, we applaud the plan's broad aims and the emphasis on interagency cooperation, resource protection, transportation improvements, and partnerships. At the same time, the draft

desired-conditions statements and strategies shared in March 2026 overlook explicit recognition of climbing, mountaineering, and guided and facilitated recreation. Given the corridor’s importance as one of the premier alpine learning environments in the United States, we believe that an effective plan must proactively acknowledge these activities, establish clear management pathways, and address longstanding issues around closures, permits, and infrastructure. To remedy these concerns, we encourage the agencies to adopt the desired condition proposed below, which would clearly recognize climbing, mountaineering, and guided and facilitated recreation as appropriate corridor uses and affirm the role of guides, volunteer trip leaders, and outdoor recreation organizations as partners in stewardship and safety.

Recommended Desired Condition

Climbing, mountaineering, and guided and facilitated recreation should be expressly recognized as appropriate uses along the SR-20 corridor. These activities should be managed under a coordinated NPS-USFS framework that supports multijurisdictional permits, consistent policies, and clear public communication across jurisdictional boundaries. Professional guides, volunteer trip leaders, and outdoor recreation organizations should be treated as partners in safety, education, stewardship, and monitoring. Additional service days during midweek and shoulder seasons should be considered for guided trips, along with expanded opportunities for facilitated educational and recreation programs. These approaches can help redistribute visitor use while creating more opportunities for the public to safely access outdoor experiences in the North Cascades. Targeted infrastructure improvements and collaborative governance with Tribes, agencies, gateway communities, and recreation partners can maintain ecological integrity while sustaining world-class climbing and mountaineering experiences.

Plan Scope and Interagency Coordination

Maintain the expanded geographic scope of the plan and continue extending coordination beyond park boundaries. We appreciate that, in response to earlier comments, the planning area was expanded from Marblemount to Lone Fir Campground. That change materially improves the planning framework because the SR-20 corridor functions as a single, interconnected recreation landscape. Visitors do not experience this area according only to agency boundaries, and management should be structured pursuant to actual visitor use patterns as much as practicable.

Even with that improvement, we believe the plan should more deliberately integrate coordination with the Okanogan–Wenatchee National Forest and the Washington Department of Transportation. Key visitor-use issues—including parking, trailhead design, signage, interpretation, waste management, emergency response, camping, and shoulder-season access—cannot be fully addressed through park-only planning. A more coordinated corridor-wide framework will reduce fragmented decision-making, improve consistency for the public, and better position the agencies to implement multijurisdictional outfitting and guiding approaches under the EXPLORE Act.

Commit to a multi-agency permitting system. Recreation trips along SR-20 sometimes cross agency boundaries, requiring guides, educational programs, and organized groups to navigate

multiple permit systems and quotas. AMGA’s previous letter notes that a unified permitting framework would enable a guide to submit one application for activities occurring on lands managed by multiple agencies. We support inclusion of language in the plan that commits to developing a multijurisdictional permit system consistent with the EXPLORE Act. Such a system would reduce administrative burden, provide predictable opportunities for commercial and educational groups and facilitate data-sharing among agencies.

Coordinate NPS visitor-capacity analysis with USFS adaptive management across boundaries. The current planning materials call for the Park Service to identify visitor capacities for non-wilderness areas, and that work should be developed in close coordination with the Forest Service using shared data sets and integrated monitoring to track visitor use, trail conditions, wildlife interactions, and resource impacts across the NPS–USFS boundary. Although the agencies may operate under different planning authorities, a unified adaptive management approach would allow managers across jurisdictions to respond more consistently to seasonal conditions, wildlife nesting, fire closures, or climate-related hazards while ensuring that climbers, hikers, and boaters receive clear and consistent communication.

Recognizing Rock Climbing and Mountaineering as Appropriate Uses

Explicitly recognize climbing and mountaineering. Public comments emphasized that climbing and mountaineering are highly valued within Ross Lake National Recreation Area and along the SR-20 corridor. Respondents expressed frustration with current access closures they perceive as unclear or overly broad and asked the park to formally recognize climbing and related pursuits as appropriate recreational uses. The 2025 public comment summary specifically notes that climbers highly value experiences at Space Wall, Canoehalem, and Ryan’s Wall, and that existing closures have completely blocked access to some of those areas. To address these concerns, the desired conditions statements should explicitly identify climbing and mountaineering as long-standing, appropriate uses of the corridor, consistent with the legislative intent for Ross Lake NRA and prior management direction. That recognition should reflect the full range of world-class climbing and mountaineering opportunities accessed between Marblemount and Lone Fir Campground.

Near Washington Pass, the corridor contains some of the country’s finest alpine traditional climbing terrain, including the Liberty Bell group—Liberty Bell, Concord Tower, Lexington Tower, North Early Winters Spire, and South Early Winters Spire—as well as Cutthroat Peak and the Kangaroo Ridge complex, including Big Kangaroo, Kangaroo Temple, and Le Petit Cheval. These peaks and towers support classic traditional and alpine routes with direct Highway 20 access, including the Beckey Route on Liberty Bell, the South Arete on South Early Winters Spire, and classic climbs on Cutthroat Peak and Kangaroo Ridge. The same is true east of Washington Pass, where Silver Star Mountain and the Wine Spires cluster—Burgundy Spire, Chablis Spire, Chianti Spire, Juno Tower, Paisano Pinnacle, and Silver Horn—form another major concentration of classic alpine traditional climbing.

Separately, the corridor also provides numerous exceptional mountaineering objectives accessed directly from SR-20, including Ruby Mountain, Graybeard Peak, and Black Peak, all of which are prized for spring snow climbs, alpine traverses, ski mountaineering, and technical and nontechnical summit ascents. The public comment summary specifically reflects strong interest

in seasonal access that supports winter and shoulder-season objectives, including improved access for backcountry skiing on Ruby Mountain. At the same time, the plan also covers lower-elevation crags in the Skagit Gorge corridor, including Ryan's Wall, which offers some of Washington's best sport climbing, and an established seasonal raptor-closure framework. Recognizing both the alpine traditional climbing and mountaineering character of the Washington Pass and Rainy Pass area, and the high-quality sport climbing resources around Newhalem and the Skagit Gorge, would better reflect how the public actually uses this landscape and why it is so important to climbers, mountaineers, guides, and outdoor education programs.

Develop a climbing management plan in partnership with stakeholders. Multiple respondents urged the park to move forward with a climbing management plan that codifies access, clarifies seasonal closures, and lays out a process for new route development. Planners should consider multi-agency coordination to ensure consistency across jurisdictions. The Access Fund and WCC letter calls for such a plan to create a pathway for safe, responsible climbing that balances resource protection with recreation. We recommend that the final plan commit to developing a comprehensive climbing management plan in collaboration with Tribes, outdoor recreation organizations and professional guides. The CMP should identify specific climbing areas, designate fixed-anchor policies, define seasonal or route-specific closures based on biological data and cultural sensitivities, and establish procedures for maintaining trails, fixed anchors, and waste infrastructure. Integrating the CMP within the broader visitor-use plan will ensure that climbing is managed proactively rather than through ad-hoc restrictions.

Use targeted closures rather than broad prohibitions. Comments highlighted that some closures appear unjustified, especially when no active nests remain or when climbers maintain sufficient distance from sensitive sites. Respondents requested better communication and suggested narrowing closures to routes nearest raptor nesting sites. We urge the Park Service to adopt targeted, science-based closures that protect nesting peregrines and culturally sensitive areas while maintaining access to unaffected routes. Climbers, guides, and volunteer leaders can play a critical role in monitoring nests, reporting violations and educating others about closure boundaries. This citizen-science partnership is already occurring; climbers have assisted park staff in observing nesting sites and communicating closures. The plan should institutionalize these collaborative monitoring programs and ensure that closure information is promptly posted on trailhead kiosks, social media and the NPS website.

Provide climbing-specific infrastructure and information. The draft desired conditions discuss transportation and general signage but do not mention climbing-specific infrastructure. The 2025 comment summary recommends formalizing and improving access trails, anchors and canoe access in partnership with climbing organizations. It notes that bolted rappel lines can save lives and reduce the amount of webbing left on routes. We support installing and maintaining fixed rappel anchors at popular descents, in consultation with climbers. The plan should also commit to building and hardening approach trails, providing bear-resistant trash and toilet facilities at trailheads and posting interpretive signage on avalanche risk, seasonal closures, cultural resources, and Leave No Trace principles. Clear, consistent information will enhance safety and reduce resource impacts for all visitors.

Enhancing Guided and Facilitated Recreation Opportunities

Recognize guided and facilitated recreation as core visitor uses. The North Cascades are an integral training ground for educational programs, and a world-class destination for members of the public who wish to experience alpine climbing with the support of trained leaders. The region's complex terrain, classic alpine routes, and close proximity to the highway corridor have made it an important classroom for AMGA training programs and for guided climbing and mountaineering trips that introduce people to the North Cascades. The Mountaineers likewise rely on the SR-20 corridor as a prime teaching landscape, where volunteer leaders facilitate climbing, mountaineering, hiking, and scrambling programs that help participants develop the skills needed to safely and responsibly travel in alpine environments.

Guided and facilitated recreation programs provide benefits that extend well beyond the immediate participants. Guides and volunteer leaders serve as trained first responders and provide an additional safety presence in areas where agency personnel may not be nearby. They also act as educators and role models for responsible recreation, teaching Leave No Trace practices and sharing knowledge to help participants develop a deeper understanding of the landscape. Guided and facilitated recreation programs expand access to outdoor opportunities, building skills, confidence, and stewardship ethic among participants who might not yet have the knowledge, experience, or connections needed to safely explore alpine environments on their own.

A balanced plan must therefore recognize guided and facilitated recreation as a core component of visitor use, explicitly name these types of use as appropriate activities, and ensure that guide services and nonprofit educational groups have predictable access to the corridor.

Permit additional service days during mid-week and shoulder seasons. Parking and trailhead capacities at high-use sites are routinely exceeded during summer weekends and holidays. However, midweek and shoulder-season use remains comparatively light. Allowing additional permitted recreation during these periods would help increase opportunities for the public, redistribute visitor use more evenly, ease congestion and provide critical economic stability for rural communities like Mazama. We recommend the plan authorize additional service days for guided trips during midweek, spring and fall seasons. The new "Organized Group Recreation Activity or Event" permit authorized by the EXPLORE Act provides a mechanism to facilitate this, and temporary permits should be convertible to priority-use permits after two years of satisfactory performance. Such flexibility will support sustainable business models and public access while protecting resources during peak demand.

Utilize outdoor leaders as partners in stewardship, monitoring and education. Professional guides and expert volunteer leaders maintain a year-round presence in the field, observe changing conditions and interact with a diverse cross-section of visitors. They can therefore serve as an extension of agency staff by collecting data on trail and route conditions, assisting with public education and promoting Leave No Trace ethics. The plan should formalize opportunities for guiding services and outdoor education organizations to partner with land managers in visitor-use monitoring, permit compliance, citizen-science projects and volunteer stewardship initiatives. As an example, both AMGA guides and Mountaineers volunteers have

partnered with Forest Service staff in the past to perform critical trail work in the Liberty Bell Group.

Visitor Transportation, Parking and Facilities

Implement shuttle services and improve parking at congested sites. The planning documents note that addressing parking and roadway congestion is a central objective. The March 2026 meeting materials presented a pilot shuttle concept connecting Sedro-Woolley, Newhalem and Washington Pass and identified trailhead-shuttle routes within the corridor, including the Colonial Creek to Washington Pass segment. We support the development of a robust shuttle system, particularly during peak season, to reduce roadside congestion, improve visitor safety and provide access for those without private vehicles. Shuttles should accommodate climbers' needs—such as space for overnight packs and climbing gear—and operate early and late enough to serve typical climbing schedules.

Expanded parking and staging areas at high-use trailheads are also necessary. AMGA's letter noted the chronic parking shortages at Rainy Pass, Blue Lake, Washington Pass and the Hairpin. Improvements should include larger parking lots, dedicated loading zones for shuttles and commercial vehicles, and hardened overflow parking areas that minimize erosion and vegetation loss. Any parking expansion should be accompanied by increased waste management and signage to prevent resource damage.

Upgrade sanitation and waste-management facilities. The public comment summary highlights the need for improved restrooms and maintained trails near climbing areas. We recommend installing additional vault toilets at busy trailheads such as Blue Lake and Washington Pass, ensuring that all waste receptacles are bear-resistant and providing educational signage about human waste disposal for backcountry users. Regular maintenance of these facilities will protect water quality and reduce wildlife habituation.

Conclusion

The SR-20 corridor is one of America's most iconic alpine landscapes and a vital classroom for outdoor education. A forward-looking frontcountry and visitor-use plan must balance the corridor's superlative natural and cultural resources with the recreational experiences that make the North Cascades beloved worldwide. We support the plan's objectives of improving safety, addressing congestion, providing diverse recreational opportunities and enhancing accessibility. To succeed, however, the plan must explicitly acknowledge climbing, mountaineering and guided and facilitated recreation as appropriate and long-standing uses; it must commit to a corridor-wide, interagency management framework; and it must develop a science-based climbing management plan that protects resources while sustaining access. By embracing targeted closures, improving infrastructure, leveraging partnerships and adapting to climate change, the National Park Service can ensure that the SR-20 corridor remains a model of sustainable, equitable and world-class mountain recreation for decades to come.

AMGA and The Mountaineers appreciate the leadership of both the National Park Service and the U.S. Forest Service in developing this plan. We stand ready to assist with technical guidance, data collection, and partnership coordination to ensure the SR-20 corridor remains a model of safe, sustainable, and inclusive mountain recreation.

Sincerely,



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The Mountaineers

Cc: U.S. Forest Service, Methow Valley Ranger District
Access Fund
Washington Climbers Coalition

Organizational Backgrounds

American Mountain Guides Association

Founded in 1979, AMGA is a 501(c)(3) educational nonprofit and the U.S. representative to the International Federation of Mountain Guide Associations (IFMGA). We train and certify professional climbing, mountaineering, and ski guides to international standards and collaborate with federal land management agencies to promote safety, conservation, and equitable public access. Through partnerships with the U.S. Forest Service, the University of Washington Outdoor Recreation and Data Lab, and the Methow Valley Ranger District, AMGA has helped improve data collection on visitor use and climbing activity along SR 20, providing the agencies with information to make informed management decisions. Our advocacy work supports science-based decision-making, climate-resilient infrastructure, and fair, efficient permitting that sustains resources, public access, and local economies.

The Mountaineers

Founded in 1906 and based in Seattle, Washington, The Mountaineers 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.” For over a century, Mountaineers members have cherished the natural beauty of the North Cascades, frequently visiting the SR-20 corridor 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. Through our organization’s advocacy work, we partner with agencies and policymakers to support conservation, sustainable recreation management, and long-term investment in public lands.