



February 19, 2016

Randy King, Superintendent  
ATTN: Wilderness Stewardship Plan  
Mount Rainier National Park  
55210 238th Avenue East  
Ashford, WA 98304

Dear Superintendent King,

Thank you for the opportunity to comment on Mt. Rainier National Park's Wilderness Stewardship Plan. We appreciate the Park's public engagement process and the opportunity to provide comments prior to the development of draft alternatives. The undersigned organizations represent over 35,000 members in Washington State who engage in active outdoor recreation in Mt. Rainier National Park (the "Park" or "MNRP") and other public lands throughout the Pacific Northwest.

Our organizations advocate for the conservation of wild places and to protect the experiential value they provide. The Wilderness Act of 1964 states that Wilderness areas "shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment."<sup>1</sup> It is the opportunity to use and enjoy Mt. Rainier National Park's Wilderness, and specifically the "opportunities for solitude or a primitive and unconfined type of recreation,"<sup>2</sup> that is important to our members who call this region home as well as those who travel here for the world-class opportunities that backcountry recreation provides in Mt. Rainier National Park.

We write to share our ideas and concerns about the stunning wilderness experiences a Wilderness Stewardship Plan will manage. We consider MRNP one of the most significant gems of the Pacific Northwest and that, overall, the Park does well in balancing access with maintaining Wilderness character. We do not support limiting recreational access to Mt. Rainier National Park or reducing the trail system.

While we appreciate the five draft alternatives outlined by the Park, we suggest the following themes be incorporated into MRNP Wilderness Stewardship Pan:

- Maintaining or improving current recreational opportunities in the Park

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<sup>1</sup> 16 U.S.C. § 1131(a)

<sup>2</sup> 16 U.S.C. § 1131(c)(2)

- Addressing and improving user conflict issues
- Improving winter and shoulder season access

We will comment on the proposed alternatives with these themes in mind.

### **Alternative 1. No Action**

While we very much appreciate the current work the Park does to protect the Wilderness character, we encourage change to address the issues outlined above. To that end, we encourage the Park to explore means to help the public use under-utilized areas of the park by:

- Improving parking at under-utilized trail heads
- Improving trails in less-utilized areas of the Park
- Encouraging and directing visitors to these areas and working with partner organizations to help market these improved opportunities

We also feel that a No Action alternative would not allow for improving shoulder season and winter access.

### **Alternative 2. Implemented General Management Plan (GMP)**

A significant concern with implementing a shuttle system, especially in the Nisqually to Paradise road corridor, would be the impact on back-country recreationists, especially backcountry skiers. Many skiers carry a selection of gear, even multiple types of boots and skis, to be able to adjust their plan and pack load to better fit conditions upon arrival. This would no longer be possible with a shuttle. Additionally, visitor's arrivals would be dispersed throughout the day, but the majority would be leaving about the same time, creating a logistical challenge that probably would leave crowds of wet, tired people waiting to descend to Longmire on stormy weekend nights. We also ask how these shuttle proposals have changed since the expansion of the parking lot and visitors' center at Paradise.

We are interested in learning more about what a visitor experience and resource protection framework for visitor capacity would look like. Has a framework for visitor capacity been established?

### **Alternative 3. Manage for Opportunities for Solitude**

Our members recognize that wilderness areas have social and ecological capacity for visitor use and that quotas can be an appropriate tool to manage the quality of the wilderness experience. That said, we encourage the Park not to decrease opportunities to visitors to access the Park. Suggestions like reducing parking at some trailheads and/or requiring parking permits in heavily used areas or quotas for day use are a concern for us. The analysis of alternatives needs to evaluate the trade-off between the need to balance the reality of social and ecological carrying capacity for recreational use with the impacts of management restrictions on visitor behavior that degrade the wilderness experience.

### **Alternative 4. Manage for Primitive and Unconfined Recreation**

Many of the proposals outlined in Alternative 4 reflect the overall themes we would like to see incorporated into the Park's Plan, including:

- Providing more parking at underutilized trailheads.
- Creating new trails or loops for visitor use.
- Increasing recreational opportunities during winter months and early spring/late fall.

### **Alternative 5. Manage for Natural and Undeveloped Lands**

We appreciate Wilderness for the natural and undeveloped lands it provides and support efforts to preserve these aspects. Suggested proposals including relocating campsites to be at least 200 feet from streams and limiting use in areas of resource degradation are good management practices.

That said, we strongly encourage the continuation of current food storage options in MRNP. Requiring bear canisters for all activities in the Park would have significant negative impacts on many types of recreation, including multi-day trips and alpine ascents such as carry-over high-alpine traverses and bivies. We believe that permit holders should be required to use proper food storage as currently outlined by the Park.

We also believe that historical structures play an integral role in experiencing Wilderness here in the U.S. and encourage the Park to utilize the National Park Service policy that clarifies and confirms its intent to maintain structures in wilderness, found in the January 2014 National Park Service publication, *Keeping it Wild in the National Park Service – A User Guide to Integrating Wilderness Character into Park Planning Management and Monitoring* when considering existing structures in Wilderness.

### **Summary**

Mt. Rainier National Park holds our State's most iconic peak and people come from all over the world to visit the Park. In short, Mt. Rainier National Park is an American treasure. With over 97% of the Park designated as Wilderness, one can assume that almost everyone who visits the park either steps into or takes in the dramatic vistas of the area's Wilderness. While our organizations are committed to protecting the last remaining Wilderness in Washington state, we are equally committed to ensuring people can access and enjoy Mt. Rainier Wilderness in a variety of ways including hiking to a mountain meadow, climbing the Park's iconic Summit, skiing backcountry terrain, or kayaking the wild rivers now and into the future.

To summarize:

- We support maintaining and improving recreational access to Mt Rainier National Park
- Addressing and improving user conflict issues
- Improving winter and shoulder season access

We encourage Mt. Rainier National Park to continue looking for ways to balance the needs of retaining and improving the Park's Wilderness character with the needs of those who love and want to enjoy Mt. Rainier National Park Wilderness – the two needs can and should live harmoniously together.

Sincerely,

Joe Sambataro, Northwest Regional Director, The Access Fund

Eddie Espinosa, Western States Manager, The American Alpine Club

Thomas O'Keefe, PhD, Pacific Northwest Stewardship Director, American Whitewater

Gus Bekker, President, El Sendero Backcountry Ski and Snowshoe Club

Katherine Hollis, Conservation and Advocacy Director, The Mountaineers

Matt Perkins, Board Member, Washington Climbers Coalition

Andrea Imler, Advocacy Director, Washington Trails Association