



September 13, 2024

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

RE: The Mountaineers Comments on the 2024 Timed Entry Reservation Pilot - Public Input Requested

Submitted via Online Portal: [National Park Service - PEPC - 2024 Timed Entry Reservation Pilot - Public Input Requested -Submit Comments \(nps.gov\)](#)

Dear Superintendent Dudgeon,

Thank you for the opportunity to submit comments on the 2024 Timed Entry Reservation Pilot. 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, and 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 and mountaineering and snow skills practice like crevasse rescue and avalanche training.



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 has been active participants throughout the multi-year Nisqually to Paradise Corridor Management planning process. We were actively involved in the initial scoping for this project and submitted comment letters in 2020 and 2021. We thoroughly reviewed the draft plan and analyzed its effects on our programs, general community, and the outdoor experience, and submitted comments to the Park in 2023. Our community of volunteers have also provided ample and robust feedback to the Park throughout the Environmental Assessment and planning process.

The 2024 timed entry reservation pilot hindered our ability to fulfill our mission and connect people to the natural world. The system made it even more challenging and burdensome for our programs to access the park for courses and trips. Often, the pilot failed to meaningfully address visitor use management issues including congestion, parking challenges, and overburdened trails. While we understand the need to address congestion and better protect natural resources in the park, we believe significant changes are necessary before considering the future use of a timed entry reservation system. We urge the Park to address our concerns with timed entry and reexamine the use of alternative visitor use management tools, as provided below.

Effects on The Mountaineers' Courses and Programs

The introduction of a timed entry pilot significantly impacted The Mountaineers ability to lead courses and trips in the Sunrise and Nisqually corridors during the 2024 summer season. The system's 90-day in advance booking window proved problematic for activities that depend on flexible planning. For trips involving climbing, mountaineering, high-mileage day hiking, and backpacking, leaders often require the ability to adapt plans based on real-time conditions. The rigid advance reservation system made it difficult for them to effectively schedule trips.

Thus, many of our leaders opted for day-before reservations. Unfortunately, these leaders encountered additional challenges that were exacerbated by the lack of a group reservation option. Many were unable to secure permits for every vehicle in their group or found that available entry times did not align with their trip objectives. For instance, multiple leaders reported that all entry times between 7am and 1pm sold out within minutes of the booking



window opening. This left limited options and led to the cancellation of numerous trips. Many students missed out on valuable outdoor instruction.

The reduction in our program capacity was significant. While over 1,400 students participated in Mountaineers-led trips and course instruction within the park in previous years, this number fell to fewer than 900 students in 2024. **The timed entry pilot reduced our trip and course capacity in the Sunrise and Nisqually corridors by around 500 students.**

Experiences of General Membership

The experiences of the Mountaineers general membership were highly varied. According to some members of our community, the timed entry system reduced overcrowding in popular areas like Paradise and Sunrise, which had previously experienced significant congestion, and reduced wait times at park entrances. Members who visited mid-week were more likely to report a positive experience with the timed entry system.

However, despite the system's goal to streamline park entry, many members reported delays of 60 minutes or longer, particularly at the Nisqually entrance. This negated some of the intended benefits of the system. Additionally, our community often reported an afternoon rush into the park after the timed entry reservation requirement ended at 3pm which resulted in long wait times and a lack of parking throughout the Nisqually and Sunrise corridors. Again, this rush seemed to negate the intended benefits of having a timed entry system. Our community also expressed frustration with the 7am timed entry start time. Those who obtained a reservation for the 7am to 9am entry slot rarely faced traffic, congestion on trails, or a lack of parking. Many felt that obtaining a reservation for 7am was an unnecessary hurdle as the park was relatively empty during that time.

Additionally, a lack of adequate signage announcing timed entry contributed to confusion and delays. Members with reservations for the Nisqually entrance reported that the first notice of the timed entry requirement was in Ashford, approximately 6 miles from the park. Our members observed park rangers turning around cars near park entrances, presumably because the vehicle's occupants did not have a timed entry reservation. This contributed to traffic congestion while entering the park.

Recommendations for Improving the Timed Entry System

Shift Timed Entry Hours

If timed entry reservations are implemented in the future, we strongly urge the Park to shift the hours in which you need a timed entry reservation from 7am - 3pm to 9am - 5pm. Our members



rarely reported traffic congestion or parking troubles before 9am this summer in the Nisqually or Sunrise corridors. However, our community reported a consistent afternoon rush into the park after the timed entry reservation window ended at 3pm. Especially on weekends, many of the visitor use management concerns that the timed entry pilot was supposed to address were only deferred to later in the afternoon. Our community reported that popular hiking areas like the Skyline Trail were significantly congested after 3pm, and many of our volunteer leaders were unable to find parking at Paradise well into the late afternoon and early evening (these leaders had not experienced that level of late afternoon traffic in previous summers).

Moving the timed entry start time from 7am to 9am would also mitigate the impact of reservations on our ability to teach critical climbing and mountaineering skills in the park. Climbers and mountaineers often need to get an early start to achieve their objectives and course goals for the day. They also need flexibility to adapt to weather and route conditions. Revising the start of the timed entry window to 9am would give our trip leaders (and recreationists in general) greater flexibility to plan their trips around safe weather and good conditions by providing a longer window in the morning to enter the park before timed entry restrictions begin. Most likely, this would come at no cost to managing visitation rates.

We also encourage the Park to consider implementing different timed entry windows for weekday and weekend use, especially if visitor use data collected this summer suggests that mid-week visitation rates are significantly lower than weekend visits. A shortened weekday timed entry window would allow more flexibility for local residents to visit the park spontaneously in the morning or afternoon. 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. Shortening the time window for timed-entry reservations on weekdays would better preserve the ability for local residents and visitors alike to visit the park spontaneously.

In summary, the timed entry system should be used only when necessary. We want the Park to avoid creating superfluous bureaucratic hurdles for visitors.

Extend the Timed Entry Window

We believe the Park should explore the possibility of a longer entry window if a timed entry system is implemented again. The two-hour entry window this summer was supposed to alleviate traffic congestion by spreading the arrival of vehicles with the same reservation time across two hours. This system was insufficient: members of our community with timed entry



reservations waited in lines of up to one hour and 45 minutes this summer to enter the park through the Nisqually, Stevens Canyon, and White River entrances.

An extended timed entry window could alleviate this congestion by spreading out visitor arrivals over a longer period. This could reduce the intensity of peak entry times, provide visitors greater flexibility in planning their trips, and lead to a smoother flow of traffic and fewer bottlenecks at park entrances.

Enhanced Signage and Communication

The Park should improve signage and public communication about timed entry requirements. Providing clear and prominent information well before visitors reach the park entrance would help alleviate long wait times which were exacerbated this summer by park-goers who were turned around at the entrance because they did not have a timed entry reservation. Our community reported that the first sign announcing timed entry en route to the Nisqually entrance was near Ashford, approximately 6 miles from the park. The Park should display signage announcing timed entry requirements in more nearby cities and towns including Packwood, Eatonville, and Enumclaw. At minimum, signage should be written in English and in Spanish. Additionally, signage should clearly state that entrances do not have wifi or cell service and alert visitors that they need to print or save a screenshot of their reservation on their phone before arriving at the park. Improved and enhanced signage would help reduce confusion around timed entry, ensure that visitors are better prepared for the entry process, and reduce entry delays.

Group Reservations

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.

The lack of a group reservation option this summer had the unintended consequence of limiting opportunities for learning outdoor skills and safety techniques. The majority of Mountaineers programs are one-day trips of under 25 persons. Although our leaders encourage carpooling, multiple vehicles are needed. Many of our volunteer leaders had to cancel their planned trips to the park this summer because drivers were unable to obtain the same timed entry-window. Leaders also expressed concern that a timed entry reservation was tied to a specific driver rather than the organized group. If that driver canceled, their entire carload would be unable to enter the park because the reservation was non-transferable.



Our trips to Unicorn Peak during the timed entry pilot illustrate how the reservation system was an unintended barrier for our courses and programs. The Mountaineers considers Unicorn Peak a nearly unparalleled outdoor teaching space for introductory TRAD and alpine climbing instruction. From 2015-2023 (with the exception of 2020 and 2021 due to the impact of the Covid-19 pandemic on our operations), our volunteer leaders led approximately 10+ trips up Unicorn Peak between May 24 and Labor Day weekend. In 2024, The Mountaineers only led 4 trips to Unicorn Peak. The timed entry pilot reduced our instructional climbing trips to Unicorn Peak by at least 60%. Many of our climb leaders attribute this to the lack of a group reservation option. Syncing multiple vehicles with the same timed entry reservation was a tremendous logistical impediment for our courses all summer.

When we've shared these concerns with the park, Park leadership has responded 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.

Staffing Investments

The Mountaineers have a long history of stewarding and volunteering in Mt. Rainier National Park. Early members helped build the Wonderland Trail, and many current members volunteer their time to care for the park today through programs like Meadow Rovers. We deeply appreciate our longstanding, strong relationship with Park Leadership and the Park's stewardship of Mount Rainier's natural resources and outdoor recreation opportunities.

Over the course of the 2024 timed entry pilot, several of our members who also volunteer as Meadow Rovers reported that the Park was overly-reliant on volunteers for managing many aspects of the day-to-day operations of the timed entry pilot. For instance, volunteers managed tents directly outside the White River and Nisqually entrances to share critical information on timed entry with park visitors.

While we fully support and encourage volunteerism in the park, we believe that the majority of work regarding the operation of the timed entry system should fall on the shoulders of Park staff. If timed entry reservations are implemented in future summers, the Park needs to invest in enough staff capacity to effectively manage the system.



Additional Comments

Shuttle System

The Mountaineers urges the Park to reconsider implementing a shuttle service from Ashford or other gateways into the park - regardless of whether or not the park decides to implement timed entry in the future. As we stated in our comments to the Park in 2023 in regards to the Draft Nisqually to Paradise Corridor Management Plan and Environmental Assessment, we believe a shuttle system in both the Paradise and Sunrise corridors would meet the purpose and need of the plan by improving the 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.

The time is right to reconsider shuttle service. According to many members of our community, the 2024 timed entry pilot failed to noticeably lessen congestion at park entrances or ease parking challenges. A comprehensive shuttle system would alleviate many of these concerns. 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.

As part of the draft plan and environmental assessment, the Park dismissed the idea of a shuttle service “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 also suggested in the draft plan that visitors prefer to use private vehicles to access the park and that 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. Additionally, the data we collected from our community this summer about the timed entry pilot suggests high demand for shuttles: our volunteers are vastly in favor of introducing a shuttle service into the park.

The planning team should develop a new shuttle service alternative that meets the purpose and need of the Nisqually to Paradise Corridor Management Plan. A robust shuttle system would improve visitor experience and reduce congestion without exceeding visitor capacity.



Equitable Access

In our 2023 comments to the Park, we shared our concerns that timed entry reservations could lead to inequitable park access. We hope the Park has collected robust visitor use data this summer and conducted outreach to low-income and underserved communities to determine how the timed entry pilot may have impacted the diversity of park visitors. We urge the Park to sufficiently analyze the potential exclusionary effects of a timed entry reservation system.

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. Moreover, 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.

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.

We urge the Park to give more serious consideration to strategies raised in this comment letter, such as shuttles, group reservations, 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.

Other Reservation Systems

One of our community’s most pressing concerns with Mt. Rainier National Park’s timed entry pilot is its lack of flexibility. The Park should consider whether a more flexible reservation system could accomplish its goal of protecting the park for future generations while improving the visitor experience.



For example, the Park should examine Yosemite National Park's preferred alternative in their [Draft Plan and Environmental Assessment](#). Under the preferred alternative - Parkwide Reservations - visitors would need one reservation to enter all areas of the park. The reservation would be valid for a three-day period, allowing visitors to enter and leave the park at any time within their reservation window. According to Yosemite National Park, this reservation system would "allow for holistic access to the park, granting visitors flexibility to come and go at any time within the three-day window and to move freely within the park to enjoy spontaneous exploration of [the park's] resources and recreational opportunities."

Since 2020, Yosemite National Park has piloted multiple different reservation systems - including Parkwide Reservations in 2024. The Park has presumably collected ample data on the impact of these management tools on visitor use, traffic patterns, and resource impacts. We encourage Mt. Rainier National Park to conduct outreach to Yosemite National Park (and other national parks that utilize reservations) to learn more about these systems and whether aspects of these systems could be incorporated into the suite of visitor use management actions that the park is considering.

Displacement

We are concerned that the timed entry pilot had the unintended consequence of displacing spontaneous use to more sensitive areas such as the Mowich Lake area and neighboring U.S. Forest Service lands including the Goat Rocks Wilderness.

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 timed entry pilot sought to reduce congestion throughout the Paradise and Sunrise trails, many of which are paved or well-built to accommodate high use, but may have increased congestion in the fragile alpine meadows of Spray Park, which are not built to accommodate high use.

Nearby federal lands including those managed by the Mount Baker-Snoqualmie National Forest and Gifford Pinchot National Forest are similarly ill-equipped to manage increased congestion and high use. We are concerned that the timed entry pilot displaced use from the Paradise and Sunrise Corridors to these nearby forest service lands that are less developed and more sparsely staffed.

It is our expectation that federal agencies work together to manage landscapes and protect resources across jurisdictional boundaries. However, it is our understanding that Park staff did not invite substantive discussion of the pilot system with the Forest Service nor did the Park



create an opportunity for federal agency partners to help proactively manage the displacement of users onto surrounding units.

The Park must collaborate with federal agencies, including the U.S. Forest Service, to determine the extent of visitor displacement that may have occurred in summer 2024 due to the timed entry pilot. If visitor displacement occurred due to the timed entry pilot or is anticipated in the future, the Park must include mitigation measures in the final plan (we also shared this need with the Park in our response to the Draft EA). These mitigation measures need to be developed in collaboration with other relevant federal agencies. Sending visitors to sites with less infrastructure and more staffing limitations without consulting those partners is not a reasonable course of action.

The Public Process

The Mountaineers want to reiterate our disappointment that the Park put the Environmental Assessment process on hold and implemented a pilot of the Park's preferred alternative. While we understand the acute challenges the Park is facing with peak summer visitation and the need to quickly implement solutions, we had hoped - and expected - for the Park to continue the public process.

Our community has been active participants in the Nisqually to Paradise Corridor Management planning process since the plan's inception. We have spent time discussing the plan with Park Leadership, [educating](#) our community about the planning process, and providing public comment. Our volunteer leaders have provided ample and robust feedback to the Park throughout the Environmental Assessment process. Yet, at no point during this process did we hear that the Park was considering implementing a pilot.

Understandably, many of our leaders felt as though their voice was not heard when the Park announced the 2024 timed entry pilot. Additionally, many of our concerns about the proposed timed entry reservation system were unaddressed in this summer's pilot.

As the Park begins to shape the Final Nisqually to Paradise Corridor Management Plan, we strongly encourage the Park to improve their communications with stakeholder groups like the Mountaineers. It is critical that the Park not only acknowledges but actively incorporates the feedback from those who are deeply invested in the park's management and stewardship and represent thousands of members across Western Washington. Effective communication and engagement with stakeholders are vital to ensure that the Park's solutions are not only practical and effective but also reflective of the diverse perspectives and expertise of its community partners.



We believe that a transparent and inclusive approach will lead to better outcomes for both the park and its visitors. By maintaining an open dialogue with organizations such as the Mountaineers, the Park can benefit from a wealth of knowledge and experience that can help refine and enhance the management strategies. Moreover, this collaborative effort will help build trust and support among all stakeholders, fostering a shared commitment to preserving and enhancing the park's natural beauty and recreational opportunities for future generations.

In conclusion, we urge the Park to re-engage with the public process, integrate valuable insights from stakeholder groups, and ensure that all voices are heard as the Final Nisqually to Paradise Corridor Management Plan is completed. This approach will not only improve the effectiveness of the management strategies but also strengthen the partnership between the Park and its dedicated community of advocates and volunteers.

Summary of our Recommendations

Again, we deeply appreciate our longstanding, strong relationship with Park leadership and the Park's stewardship of Mount Rainier's natural resources and outdoor recreation opportunities. We appreciate the Park's work in implementing the pilot this summer, and extend our gratitude to the planning team as they develop the Final Nisqually to Paradise Corridor Management 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 management plan by developing a final plan that incorporates the following attributes:

- **Shift Timed Entry Hours:** Adjust the timed entry reservation hours to 9 a.m. – 5 p.m. to reduce afternoon congestion and better accommodate early morning activities, such as climbing and mountaineering, while allowing for more flexible visitor access.
- **Extend the Timed Entry Window:** Implement a longer entry window to spread out visitor arrivals, reducing wait times and congestion at park entrances.
- **Enhanced Signage and Communication:** Improve signage and communication about timed entry requirements well before reaching the park entrance. Ensure signage is clear, bilingual, and located in nearby cities and towns to reduce confusion and wait times.
- **Implement Group Reservations:** Introduce a group reservation option to facilitate equitable access and support organized activities. Address concerns about reselling by implementing controls to prevent misuse.
- **Invest in Staffing:** Increase Park staff capacity to manage timed entry operations effectively. Invest in staffing for informational tents, line management, and entrance station efficiency.



- **Implement Shuttle Systems:** Reevaluate the implementation of a shuttle service from gateway communities to the park to reduce congestion and improve visitor experience.
- **Address Equity Concerns:** Assess the impact of the timed entry system on access for low-income and underserved communities. Develop strategies to make reservations more accessible and reduce barriers to entry.
- **Explore Flexible Reservation Systems:** Look into implementing alternative reservation models, such as Yosemite National Park's Parkwide Reservations, which offer greater flexibility than timed entry reservations and improve visitor experience while managing park access.
- **Partner with Relevant Agencies to Mitigate Displacement:** Track and address any displacement of visitor use to more sensitive areas like Mowich Lake and nearby U.S. Forest Service lands, and work closely with relevant agencies to develop mitigation measures.
- **Improve Public Process and Engagement:** Enhance communication and engagement with stakeholders, such as The Mountaineers, to ensure their feedback is incorporated into Park management decisions.

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
Conservation & Advocacy Director
betsyr@mountaineers.org



The Mountaineers Responses to Mount Rainier National Park's Survey on the 2024 Timed Entry Reservation Pilot:

1) Did you visit Mount Rainier between Memorial Day and Labor Day in 2024?

Yes. Between Memorial Day and Labor Day in 2024, nearly 900 students participated in Mountaineers trips and outdoor education courses within Mt. Rainier National Park. Many of our 16,000+ members also regularly engaged in active outdoor recreation on the trails, glaciers and peaks of the park throughout the summer.

2) If so, did you obtain or seek to obtain a timed entry reservation for the Paradise or Sunrise Corridor?

Yes. A majority of the nearly 900 students who participated in Mountaineers trips and outdoor instruction in the park this summer either obtained timed entry reservations for the Paradise or Sunrise Corridors or entered the park during timed entry reservation hours using an exemption to timed entry like a climbing permit. Many of our members also purchased or sought to obtain timed entry reservations for individual trips.

3) If you obtained a timed-entry reservation, or tried to obtain a timed-entry reservation, please share what did or did not work well for you using the reservation system?

Many Mountaineers leaders reported difficulties in obtaining timed-entry reservations which hindered their ability to plan and execute trips in the Sunrise and Nisqually corridors. The 90-day advance booking window presented one logistical challenge for our volunteer leaders. The majority of our courses, programs, and trips that have historically operated in Mt. Rainier National Park during peak visitation season - including climbing, mountaineering, high-mileage day hiking, and backpacking - rely on safe weather and terrain conditions. Many of our leaders expressed that booking a reservation 90 days in advance was infeasible, especially for trips into potentially hazardous terrain. Thus, many of our leaders opted for day before timed entry reservations.

Unfortunately, day before reservations - and the lack of a group reservation option - consistently impeded The Mountaineers ability to lead courses in the park. Leaders found it extremely challenging to coordinate trips with multiple vehicles. Leaders and students who attempted to obtain day before reservations at 7pm the night prior to their trip often were either unable to secure any reservations, could not secure reservations



for every vehicle in the group, or were only able to secure a permit for an entry time that was incompatible with their trip or course goals (for example, multiple leaders reported that just minutes after the booking window opened, all entry times between 7am - 1pm sold out). Leaders who were unable to obtain a day before reservation often had to cancel their trips, resulting in many Mountaineers students missing out on critical outdoor instruction.

One of our leaders described the impact of timed entry on her ability to lead trips in the park: "I am a hike and scramble leader [for the Mountaineers]. Because of the timed entry system, I have not successfully led any trips within the park this summer. The first time I tried to lead a hike, everyone except one carload canceled at the last minute because they could not get a permit at 7pm the previous evening. The second time I tried to lead a hike, only one car was able to get a [timed entry reservation] in the morning. The other two cars got a timed entry reservation for an afternoon entry time which didn't give us enough time to safely hike."

Overall, the timed entry reservation system had a significant impact on our community's ability to lead courses and trips in the park. In both 2022 and 2023, during the same timeframe as this summer's timed entry pilot (May 24 - Sept. 2), over 1,400 Mountaineers members entered the park as part of an official Mountaineers course or field trip. During the 2024 timed entry pilot, less than 900 Mountaineers students entered the park on an official trip. **The timed entry pilot reduced our trip and course capacity in the Sunrise and Nisqually corridors by around 500 students.**

Our general membership of 16,000+ Mountaineers reported similar challenges and shortcomings as they attempted to procure timed entry reservations. However, members who had the flexibility to visit the park mid-week were more likely than weekend visitors to say that the system was easy to navigate and that they were able to purchase a reservation for their preferred entrance date and time.

4) If you obtained a timed entry reservation, please share what did or did not work well for you when entering the park?

Our members had a wide range of experiences with the 2024 timed entry pilot when entering the park. Some members reported that the system effectively managed visitor flow and helped reduce overcrowding at the park's most popular locations. For instance, some members stated that areas like Paradise and Sunrise, which previously experienced significant congestion, seemed less crowded under the timed entry system.



However, for many members of our community who obtained a timed entry reservation, or who entered the park during timed entry hours with an exemption (often a climbing permit), the entry process was marred by long wait times and congestion at park entrances. Although the reservation system was intended to streamline entry, many of our members reported significant delays of 60 minutes or longer, particularly at the Nisqually entrance. These wait times negated some of the potential benefits of having a reservation and sometimes impeded planned Mountaineers activities. Members who visited the park midweek generally reported shorter wait times (30 minutes or less).

The majority of Mountaineers members who experienced long wait times also witnessed park rangers turn multiple vehicles around near the park entrance, presumably because these vehicles did not have a permit. Members attributed this to a lack of signage alerting the public to timed entry; when driving to the Nisqually entrance from the greater Seattle area, the first sign announcing the timed entry pilot was near Ashford, WA, approximately 6 miles from the park entrance.

5) If you entered the park during the timed entry period (between 7 a.m. and 3 p.m. from Memorial Day weekend through Labor Day 2024), what did you like about your experience, and what would you change?

Please see Question 6 for what aspects of the 2024 timed entry system we like (and would keep the same if timed entry is implemented at the park in the future) and what we would change about the system.

6) If a timed entry reservation system is implemented at Mount Rainier National Park in the future, what would you keep the same as the 2024 Pilot and what would you change?

If a timed entry reservation system is implemented at Mt. Rainier National Park in the future, we hope these features of the 2024 pilot:

Stay the Same

Reservation Options

The option to make reservations 90 days in advance or the night before should be maintained. This flexibility allows for both long-term planning and spontaneous visits, catering to a range of visitor needs.



Exemptions to Timed Entry

The ability to enter the park during timed entry hours with a climbing or wilderness camping permit rather than a timed entry reservation is critical for our courses, trips, and community at large. We also support the continued use of other timed-entry exemptions including walk-up climbing permits and campground reservations.

Change

Shift Timed Entry Hours

If timed entry reservations are implemented in the future, we urge the Park to shift the hours in which you need a timed entry reservation from 7am - 3pm to 9am - 5pm. Our members rarely reported traffic congestion or parking troubles before 9am this summer in the Nisqually or Sunrise corridors. However, our community reported a consistent afternoon rush into the park after the timed entry reservation window ended at 3pm. Especially on weekends, many of the visitor use management concerns that the timed entry pilot was supposed to address were only deferred to later in the afternoon. Our community reported that popular hiking areas like the Skyline Trail were significantly congested after 3pm, and many of our volunteer leaders were unable to find parking at Paradise well into the late afternoon and early evening. (These leaders had not experienced that level of late afternoon traffic and congestion in previous summers).

Moving the timed entry start time from 7am to 9am would also mitigate the impact of reservations on our ability to teach critical climbing and mountaineering skills in the park. Climbers and mountaineers often need to get an early start to achieve their objectives and course goals for the day. They also need flexibility to adapt to weather and route conditions. Revising the start of the timed entry window to 9am would give our trip leaders (and recreationists in general) greater flexibility to plan their trips around safe weather and good conditions by providing a longer window in the morning to enter the park before timed entry restrictions begin. Most likely, this would come at no cost to managing visitation rates. Our leaders and community reported that there were rarely any lines, parking challenges, or overcrowding on popular hiking trails between 7am - 9am.

We also encourage the Park to consider implementing different timed entry windows for weekday and weekend use, especially if visitor use data collected this summer suggests that mid-week visitation rates are significantly lower than weekend visits. A shortened weekday timed entry window would allow more flexibility for local residents to visit the park spontaneously in the morning or



afternoon. 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. Shortening the time window for timed-entry reservations on weekdays would better preserve the ability for local residents and visitors alike to visit the park spontaneously.

In summary, the timed entry system should be used only when necessary. We want the Park to avoid creating superfluous bureaucratic hurdles for visitors.

Extend the Timed Entry Window

We believe the Park should explore the possibility of a longer entry window if a timed entry system is implemented again. The two-hour entry window this summer was supposed to alleviate traffic congestion by spreading the arrival of vehicles with the same reservation time across two hours. This system was insufficient: members of our community with timed entry reservations waited in lines of up to one hour and 45 minutes this summer to enter the park through the Nisqually, Stevens Canyon, and White River entrances.

An extended timed entry window could alleviate this congestion by spreading out visitor arrivals over a longer period. This could reduce the intensity of peak entry times, provide visitors greater flexibility in planning their trips, and lead to a smoother flow of traffic and fewer bottlenecks at park entrances.

Enhanced Signage and Communication

The Park should improve signage and public communication about timed entry requirements. Providing clear and prominent information well before visitors reach the park entrance would help alleviate long wait times which were exacerbated this summer by park-goers who were turned around at the entrance because they did not have a timed entry reservation. Our community reported that the first sign announcing timed entry en route to the Nisqually entrance was near Ashford, approximately 6 miles from the park. The Park should display signage announcing timed entry requirements in nearby cities and towns including Packwood, Eatonville, and Enumclaw. At minimum, signage should be written in English and in Spanish. Additionally, signage should clearly state that entrances do not have wifi or cell service and alert visitors that they need to print or save a screenshot of their reservation on their phone before arriving at the park. Improved and enhanced signage would help reduce confusion around



timed entry, ensure that visitors are better prepared for the entry process, and reduce entry delays.

Group Reservations

Group reservations are critical to ensuring 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.

The lack of a group reservation option this summer had the unintended consequence of limiting opportunities for learning outdoor skills and safety techniques. The majority of Mountaineers programs are one-day trips of under 25 persons. Although our leaders encourage carpooling, multiple vehicles are typically needed. Many of our volunteer leaders had to cancel their planned trips to the park this summer because drivers were unable to obtain the same timed entry-window. Our leaders were also concerned that a timed entry reservation was tied to a specific driver rather than the organized group. If that driver canceled, their entire carload would be unable to enter the park because the reservation was not transferable to a new vehicle.

Our trips to Unicorn Peak during the timed entry pilot illustrate how the reservation system was an unintended barrier for our courses and programs. The Mountaineers considers Unicorn Peak a critical outdoor teaching space for introductory TRAD and alpine climbing instruction. From 2015-2023 (with the exception of 2020 and 2021 due to the impact of the Covid-19 pandemic on our operations), our volunteer leaders led approximately 10+ trips up Unicorn Peak between May 24 and Labor Day weekend. In 2024, The Mountaineers only led four trips to Unicorn Peak. The timed entry pilot reduced our instructional climbing trips to Unicorn Peak by at least 60%. Many of our climb leaders attribute this to the lack of a group reservation option. Syncing multiple vehicles with the same timed entry reservation was a tremendous logistical impediment for our courses all summer.

When we've shared these concerns with the park in the past, Park Leadership has responded 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.

Staffing Investments

The Mountaineers have a long history of stewarding and volunteering in Mt. Rainier National Park. Early members helped build the Wonderland Trail, and many current members volunteer their time to care for the park today through programs like Meadow Rovers. We deeply appreciate our longstanding, strong relationship with Park Leadership and the Park's stewardship of Mount Rainier's natural resources and outdoor recreation opportunities.

Over the course of the 2024 timed entry pilot, several of our members who also volunteer as Meadow Rovers reported that the Park was overly-reliant on volunteers for managing many aspects of the day-to-day operations of the timed entry pilot. For instance, volunteers managed tents directly outside the White River and Nisqually entrances to share critical information on timed entry with park visitors.

While we fully support and encourage volunteerism in the park, we believe that the majority of work regarding the operation of the timed entry system should fall on the shoulders of Park staff. If timed entry reservations are implemented in future summers, the Park needs to invest in enough staff capacity to effectively manage the system.

- 7) If a timed entry reservation system is not implemented at Mount Rainier National Park in the future, what actions should the National Park Service take to provide high quality visitor experiences while ensuring that the park remains protected for this and future generations?**

Shuttle System

The Mountaineers urges the Park to reconsider implementing a shuttle service from Ashford or other gateways into the park - regardless of whether or not the park decides to implement timed entry in the future. As we stated in our comments to the Park in 2023 in regards to the Draft Nisqually to Paradise Corridor Management Plan and Environmental Assessment, we believe a shuttle system in both the Paradise and White River corridors would meet the purpose and need of the plan by improving the 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.

The time is right to reconsider shuttle service. According to many members of our community, the 2024 timed entry pilot failed to noticeably lessen congestion at park entrances or ease parking challenges. A comprehensive shuttle system would alleviate many of these concerns. 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 reduce climate impacts of visitation.

As part of the draft plan and environmental assessment, the Park dismissed the idea of a shuttle service “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 also suggested in the draft plan that visitors prefer to use private vehicles to access the park and that 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. Additionally, the data we collected from our community this summer about the timed entry pilot suggests a high demand for shuttles: our volunteers are vastly in favor of introducing a shuttle service into the park.

The planning team should develop a new shuttle service alternative that meets the purpose and need of the Nisqually to Paradise Corridor Management Plan. A robust shuttle system would improve visitor experience and reduce congestion without exceeding visitor capacity.

Other Reservation Systems

One of our community’s most pressing concerns with Mt. Rainier National Park’s timed entry pilot is its lack of flexibility. The Park should consider whether a more flexible reservation system could accomplish its goal of protecting the park for future generations while improving the visitor experience.



For example, the Park should examine Yosemite National Park's preferred alternative in their [Draft Plan and Environmental Assessment](#). Under their preferred alternative - Parkwide Reservations - visitors would need one reservation to enter all areas of the park. The reservation would be valid for a three-day period, allowing visitors to enter and leave the park at any time within their reservation window. According to Yosemite National Park, this reservation system would "allow for holistic access to the park, granting visitors flexibility to come and go at any time within the three-day window and to move freely within the park to enjoy spontaneous exploration of [the park's] resources and recreational opportunities."

Since 2020, Yosemite National Park has piloted several different reservation systems, including parkwide reservations in 2024. The Park has presumably collected ample data on the impact of these reservation pilots on visitor use, traffic patterns, and resource impacts. We encourage Mt. Rainier National Park to conduct outreach to Yosemite National Park (and other national parks that utilize reservations) to learn more about these systems and whether aspects of these systems could be incorporated into the suite of visitor use management actions that the Park is considering.

8) What other ideas or feedback would you like to share regarding the 2024 Timed Entry Pilot at Mount Rainier National Park?

Displacement

We are concerned that the timed entry pilot had the unintended consequence of displacing spontaneous use to more sensitive areas such as the Mowich Lake area and neighboring U.S. Forest Service lands including the Goat Rocks Wilderness.

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 timed entry pilot sought to reduce congestion throughout the Paradise and Sunrise trails, many of which are paved or well-built to accommodate high use, but may have increased congestion in the fragile alpine meadows of Spray Park, which are not built to accommodate high use.

Nearby federal lands including those managed by the Mount Baker-Snoqualmie National Forest and Gifford Pinchot National Forest are similarly ill-equipped to manage increased congestion and high use. We are concerned that the timed entry pilot



displaced use from the Paradise and Sunrise Corridors to these nearby forest service lands that are less developed and more sparsely staffed.

It is our expectation that federal agencies work together to manage landscapes and protect resources across jurisdictional boundaries. However, it is our understanding that National Park staff did not invite substantive discussion of the pilot system with the Forest Service nor did the Park create an opportunity for federal agency partners to help proactively manage the displacement of users onto surrounding units.

The Park must collaborate with federal agencies, including the U.S. Forest Service, to determine the extent of visitor displacement that may have occurred in summer 2024 due to the timed entry pilot. If visitor displacement occurred due to the pilot or is anticipated in the future, the Park must include mitigation measures in the final plan (we also shared this need with the Park in our response to the Draft EA). These mitigation measures need to be developed in collaboration with other relevant federal agencies. Sending visitors to sites with less infrastructure and more staffing limitations without consulting those partners is not a reasonable course of action.

The Public Process

The Mountaineers want to reiterate our disappointment that the Park put the Environmental Assessment process on hold and implemented a pilot of the Park's preferred alternative. While we understand the acute challenges the park is facing with peak summer visitation and the need to quickly implement solutions, we had hoped - and expected - for the Park to continue the public process.

Our community has been active participants in the Nisqually to Paradise Corridor Management planning process since the plan's inception. We have spent time discussing the plan with Park Leadership, [educating](#) our community about the planning process, and providing public comment. Our volunteer leaders have provided ample and robust feedback to the Park throughout the planning process as well. Yet, at no point during this process did we hear that the Park was considering implementing a pilot.

Understandably, many of our leaders felt as though their voice was not heard when the Park announced the 2024 timed entry pilot. Additionally, many of our concerns about the proposed timed entry reservation system were unaddressed in this summer's pilot.

As the Park begins to shape the Final Nisqually to Paradise Corridor Management Plan, we strongly encourage the Park to improve their communications with stakeholder



groups like The Mountaineers. It is crucial that the Park not only acknowledges but actively incorporates the feedback from those who are deeply invested in the park's management and stewardship and represent thousands of members across Western Washington. Effective communication and engagement with stakeholders are vital to ensure that the Park's solutions are not only practical and effective but also reflective of the diverse perspectives and expertise of its community partners.

We believe that a transparent and inclusive approach will lead to better outcomes for both the park and its visitors. By maintaining an open dialogue with organizations such as The Mountaineers, the park can benefit from a wealth of knowledge and experience that can help refine and enhance visitor use management strategies. Moreover, this collaborative effort will help build trust and support among all stakeholders, fostering a shared commitment to preserving and enhancing the park's natural beauty and recreational opportunities for future generations.

In conclusion, we urge the Park to re-engage with the public process, integrate valuable insights from stakeholder groups, and ensure that all voices are heard as the planning team develops the Final Nisqually to Paradise Corridor Management Plan. This approach will not only improve the effectiveness of the management strategies but also strengthen the partnership between the park and its dedicated community of advocates and volunteers.