

# Visitor sentiment concerning changes in backcountry permit allocation at Glacier National Park, Montana, USA

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## Abstract

As visitation to parks and protected areas in the USA continues to increase, many federal land management agencies have implemented visitor use limits within their respective management areas to protect the environment while also providing for visitor enjoyment. The rationing of use has become a complex task, with managers having to balance system efficiency with equality and equity concerns on numerous levels. Rationing systems such as lotteries, reservations, first-come first-served and pricing mechanisms have all been used in different contexts, with trade-offs existing within each of these systems. In February 2023, Glacier National Park (Montana, USA) proposed to transition their online backcountry permitting system from a *manually-administered* lottery to a non-lottery reservation system. This study uses the theory of distributive justice to deductively code public comments related to the proposed transition in order to determine how a sample of the public perceives changes in rationing, and how their comments are distributed amongst competing social goals. Many of these comments contain nuance, adding to a wide array of sentiments that will provide managers with a public perspective on this multifaceted issue.

## Profile

Protected area

Glacier National Park

Mountain range

Rocky Mountains

Country

USA

## Introduction

Visitor use of parks and protected areas across the US has increased dramatically since the 1960s (Smith et al. 2019), prompting many federal public land management agencies to implement use restrictions in the form of reservations, permits, or other forms of managed access (Hartman et al. 2021). Frequently recommended as a *“last resort”*, access restriction is seen by many as antithetical to wildland recreation (Hendee & Lucas 1974; Lucas 1983), and many parks and protected areas struggle to balance access to recreational experiences with the protection of the environment within which these experiences occur. Different management practices have been used over time throughout US protected areas with varying degrees of success; direct approaches (e.g., closures, campfire restrictions) have been used to determine visitor behaviour directly, while indirect approaches (e.g., education, infrastructure improvements) attempt to guide this behaviour by influencing various decision factors that visitors face (Peterson & Lime 1979).

When permits giving access to a particular area are required, this is a form of direct management. If a use-permit system is implemented, permits must be allocated to visitors using rationing techniques such as lotteries, reservations or queuing (McCool & Utter 1981). Importantly, each allocation technique has trade-offs, and no particular system will perfectly meet the preferences of all users, as each user has different desires and motivations for visiting a particular area (Rice & Phillips 2023). The theory of distributive justice, a framework that involves the competing social

goals of equality, equity, need and efficiency (Homans 1961), was applied conceptually in recreation research and practice during the 1970s and 80s in attempts to tease out the competing aspects and trade-offs of various allocation systems (e.g., Shelby et al. 1982, 1989). In essence, distributive justice provides a framework for researchers to explore equity (or fairness), which is often multifaceted. As Shelby et al. (1989) point out in discussing Homans’s social goals, *“What is ‘fair’ to one person [...] may not be ‘fair’ to the next”* (p. 62). As recreation rationing within mountain protected areas becomes more widespread – following increased visitor use – guidance is needed to help managers determine how to maximize distributive justice (McCool & Utter 1981). Recent research on public perspectives on rationing is scarce (Rice & Phillips 2023), thus perspectives stemming from recent changes in how access is rationed may hold significant implications for managers globally.

## The case of wilderness permits at Glacier National Park

Recreation.gov is one system through which reservations can be made and lotteries entered for US federal recreation opportunities. In February 2023, Glacier National Park (GNP) proposed to move its advance wilderness camping permit reservation system to Recreation.gov, away from a *“lengthy manual lottery”* administered via Pay.gov (GNP 2023a, p. 1). GNP is a 410,077-hectare protected area in the Rocky Mountains of Montana (USA) (48.776443, -113.795083). It uniquely contains terrain spanning Pacific, Atlantic and Arctic Ocean watersheds. The park offers a wide

Table 1 – Key differences between the previous (pre-2023) backcountry permit allocation system at Glacier National Park and the proposed allocation system.

	Previous System	Proposed System
<b>Allocation of standard advanced permits</b>	"All applications submitted on opening day (March 15) between 12:00am MST [Mountain Standard Time] and 11:59pm MST will be processed in randomly sequenced order." <sup>1</sup>	"Wilderness camping reservations would be available on Recreation.gov beginning at 8:00 am MDT on March 15." <sup>3</sup>
<b>Application procedures</b>	"You can choose up to four (4) different itineraries [...] in the order that you prefer, and on the dates that you prefer." <sup>2</sup>	"Applicants would book their own advance reservations (instead of park staff booking reservations for applicants)." "A Recreation.gov account would be necessary to make reservations." <sup>3</sup>
<b>Fees</b>	\$40 (\$30 refunded if unsuccessful) + \$7/person/night <sup>1</sup>	\$10 + \$7/person/night <sup>3</sup>
<b>Group size limit under standard permit</b>	8 campers <sup>1</sup>	4 campers <sup>3</sup>
<b>% of permits held for walk-ups from 15 June to 30 Sept. 2023</b>	30% <sup>3</sup>	30% <sup>3</sup>

<sup>1</sup> <https://web.archive.org/web/20190613020930/https://www.nps.gov/glac/planyourvisit/backcountry-reservations.htm>

<sup>2</sup> <https://web.archive.org/web/20190616201552/https://www.nps.gov/glac/planyourvisit/upload/Advance-Reservations-STEP-by-STEP-Tutorial-2016.pdf>

<sup>3</sup> <https://parkplanning.nps.gov/document.cfm?parkID=61&projectID=114545&documentID=126169>

spectrum of recreational opportunities across front-country (i. e. more accessible) and wilderness settings. It is bisected by the Continental Divide National Scenic Trail (CDT) which runs north–south, and by the popular Going-to-the-Sun Road scenic parkway which runs east–west. From 2002 to 2022, annual visitation to GNP increased 52%, from 1.9 million to 2.9 million visitors. The 50-mile-long Going-to-the-Sun Road introduced a pilot vehicle entry reservation ticket in 2021 due to the congestion that occurred as the Park saw record numbers of visitors (GNP 2021), and backcountry permits to designated camping areas exist to “minimize resource impacts while providing positive visitor experiences” (GNP 2023c, para. 3).

GNP’s original lottery system involved users submitting their desired itineraries and a range of available dates via Pay.gov, with the option of indicating whether or not these details were flexible (GNP 2019a). During the manual lottery process, GNP staff randomly selected applications and reviewed them individually, scheduling visits within the backcountry zones until those campsites and dates which were allotted for reservations were reserved for the season, at which point visitors were contacted with their final itinerary (GNP 2019b). The 2023 proposed reservation system shifted small-group permits (1–4 campers per permit) to a new proposed online reservation system, administered via Recreation.gov, with all reservations opening on 15 March at 8:00 a.m. MDT. Large-group permits (5–12 campers) would remain on the lottery system administered via Pay.gov (GNP 2023a). Importantly, the proposed new reservation system would retain the original walk-up permit availability, where 30% of spaces in “advance reservation campsites that are not booked would still be made available for walk-up permits” for visitors who arrive without having pre-booked (GNP 2023a).

GNP announced this proposed system in a two-page newsletter and provided a two-week public com-

ment period from February 3–17, 2023 (GNP 2023a). The rationale provided in this document for moving to Recreation.gov was a combination of the high demand for wilderness camping permits and the administrative burden of the manual lottery system currently in place. Recreation.gov is a privately-administered website that has been used for the past decade by numerous parks and forests throughout the US to reserve campsites, entry permits, river trips and other recreation opportunities on public land. Discussion of the successes (e.g., GNP’s day-use permits for the Going-to-the-Sun Road; Peruzzi 2023) and challenges (Pohle 2023) of Recreation.gov receive frequent media attention in the US. This particular move to Recreation.gov was stated to “replace the labor-intensive lottery with a more efficient, user directed online service” (GNP 2023a, p. 1). Importantly, the old system administered via Pay.gov would still be used under the proposed structure, but under a shorter timeframe and only for specific large-group permits. The announcement also highlighted fee changes, as detailed in Table 1.

Following the release of this announcement, a two-week comment period was allowed for public input, as outlined in the 1969 National Environmental Policy Act (NEPA). According to this Act, during agency decision-making processes federal land management agencies must inform the public of what they are proposing to do that may have significant environmental impacts; agencies must also give the public an opportunity to participate in the form of comments submitted to them. Public land management in the US is procedurally complex, and NEPA provides important aspects of information sharing, public participation, precaution and accountability in federal administrative policy as they pertain to the environment. After completing an environmental assessment or impact statement and considering public comments and other pertinent information, including alternatives to the proposed action, the agency concerned must release

its decision (National Environmental Policy Act 1969). Following the two-week comment period, GNP released the 156 public comments it had received in a 51-page document titled *Public Comments – Migration of Wilderness Permit Reservation System to Recreation.gov* (GNP 2023b). Commenters expressed a wide range of opinions, from strong opposition to strong support for the new system.

While the system was subsequently adopted and implemented by GNP in March 2023, an exploration of these public comments helps recreation scholars and practitioners to better understand what issues a subset of public users felt were important to bring to the attention of GNP. As more national parks and wilderness areas move to reservation-based permit systems (Hartman et al. 2021), an understanding of public sentiment surrounding these systems is critical if permit allocation systems are to be well-received, user-friendly, and meet the ideals of distributive justice. Accordingly, our research questions are:

1. How do public comments regarding GNP's proposed rationing transition distribute amongst the distributive justice concepts of equity, equality and efficiency?
2. Within these distributive justice concepts, in what context are they discussed: positively, negatively, offering a change, or posing a question?

## Methods

The 156 public comments that were submitted during a two-week period were analysed and coded using a *deductive* coding approach, with the theory of distributive justice as the guiding framework (Homans 1961). Homans' (1961) framework has been applied consistently in pursuit of fair recreation allocation (Ewert & Hollenhorst, 1990) and was central to the seminal work of Shelby et al. (1989). Recent work has applied Homans' (1961) concept of distributive justice to similar means (Rice & Phillips 2023; Suárez et al. 2020). During the initial research design stage, an *inductive* approach was envisioned as the appropriate method to allow themes to emerge from the data (Glaser & Strauss 1967); however, while analysing the data it became clear that the complexities of each individual comment fell generally into the theoretical framework presented in the theory of distributive justice (Homans 1961). Thus, an a priori coding approach was used to identify the underlying concepts of distributive justice within the data (Lazar 2017).

Three of the four concepts within distributive justice were explored: efficiency, equity and equality. The remaining concept, need, was not explored due to the nature of the proposed permitting system. In the context of distributive justice within social situations, *need* frequently refers to specialized access to public facilities by particular individuals or groups (Shelby et al. 1989), for example because of mobility issues or visual impairment. In the proposed system, however, visitors

with additional needs are not differentiated from other visitors.

In this coding scheme, efficiency is defined operationally as addressing whether the proposed system works well; equity is defined as discussing the fairness of the system; equality is defined as discussing equal access to GNP under this system. Importantly, the distributive justice framework differentiates equity as a component of, not an equivalent to, justice. As concluded by Michel (2019), *"It is worth considering whether a differentiated use of the terms equity and justice would make sense in PA [protected area] project assessment more widely, and even more so in planning"* (p. 31). Thus, justice is *"a more comprehensive term to use than equity"* (ibid.).

Prior to coding it for the different aspects of distributive justice, each comment was coded as being overarchingly positive, negative, suggesting a change, or posing a question. Importantly, while some comments are positive overall in that they support the change, these frequently also mention negative aspects of the system, pose a question or propose a change. This nuance is crucial, as the multifaceted nature of the comments means that they cannot always be generalized simply as *positive* or *negative*. The coding scheme therefore led to breaking each comment down into subcategories, regardless of the overarching code. Each comment was then coded for thematic mentions of efficiency, equity or equality.

## Results

The public comments, which we quote verbatim in this section, without correcting for spelling or grammatical errors, reveal a wide range of sentiments surrounding the rationing of a scarce resource, in this case backcountry camping permits at GNP. While this is certainly a small subset of the public, as not all visitors (or potential visitors) to GNP participated in this public comment period, the relative frequency of each comment type within the 156 public comments reveals a general picture: 38 comments were generally positive (in favour of the transition), 59 were generally negative, 39 offered a change to the proposed system, and 20 had questions that did not reveal a particular stance. In addition, most comments also approached the different aspects of distributive justice: efficiency (i.e. does the proposed system work?), equity (i.e. is the proposed system fair?), and equality (i.e. does the proposed system provide equal access?) (Table 2).

Following initial coding for general comment positions, each comment was then coded to examine the nuanced structure of the content (see Table 2). For example, if efficiency was raised in the comment, was it in a positive, negative, change or question context? Importantly, individual comments frequently contain multiple distributive justice concepts in varying contexts. For example, Commenter 1 mentioned both efficiency and equity concepts in a negative context when they stated:

Table 2 – Coding framework and findings for the 156 public comments, with subcategory totals and the corresponding number of mentions.

	Efficiency (Does the system work?)	Equity (Fairness)	Equality (Access)
	mentions		
Positive (+)	41	4	2
Negative (–)	50	55	19
Change (Δ)	45	21	25
Question (Q)	40	6	4
Total	176	86	50

*This sounds like a TERRIBLE IDEA! Based on the description, for groups of 1–4, it would become a Ticketmaster-like free for all for reservations starting March 15<sup>th</sup>. While the current lottery system also has winners and losers, it at least is both civilized and feels fair. The future lottery need not be done manually – matching algorithms for this sort of thing are done by computer all the time – but please do not turn it into a death match free-for-all on March 15<sup>th</sup> every year.*

Within the public comments, a wide variety of sentiments exist in multiple contexts based on the prior experience of the individual as well as on the perceived impacts of the proposed changes. Some users were planning to visit from far away and preferred the proposed system due to the ability to reserve well in advance of the trip, so that travel accommodation could also be booked in a timely fashion. Some users thought that the proposed non-lottery-based system would be more efficient, while others preferred a lottery due to perceived fairness and non-bias towards those with faster internet speeds.

Each of the three distributive justice components utilized in this study is explored in the following sections.

### Efficiency

Of the three distributive justice components analysed, the efficiency of the proposed permit system was mentioned the most frequently in the public comments, although the sentiment within these comments was distributed almost evenly across the four sentiment options (Table 2). On the positive side, some users liked that the system would remove the waiting time for visitors to receive confirmation, one user stating that “moving the reservation system to recreation.gov does have some advantages, such as backpackers finding out if they got an itinerary faster than with a lottery system” (Commenter 37). Several others noted that Recreation.gov is used at many other parks across the country, which gives them confidence that this system would ultimately work well. For example, Commenter 63 states:

*This will simplify and streamline the system and place all reservations within the same system. This will reduce confusion and eliminate needless redundancies. Recrea-*

*tion.gov is already successfully used across the nation by millions of users, this proposal make sense.*

Many others felt that the transition would have negative consequences for efficiency, frequently mentioning the possibility of bots<sup>1</sup> (or computer algorithms) on Recreation.gov and the release of all permits at 8:00 a.m. on one day (15 March). Yet others highlighted the very limited booking window as an issue, with “a mad dash / scramble on March 15<sup>th</sup> at 8 am for all the reservable permits for that season” (Commenter 52). Many users pointed out potential issues regarding building a multi-day itinerary: if one of the campgrounds in a long itinerary was already taken before a user could complete their own transaction, the user would have to start all over again and potentially lose any chance of a permit for their preferred itinerary.

Many users offered suggestions for potential changes to the proposed system. While some suggested retaining the lottery system (or some version of one) for both small- and large-group permits, others requested that there should be a way to select an itinerary before the 8:00 a.m. application start, so that multiple nights could be loaded into an itinerary prior to the “mad dash”, as it was called several times. One user suggested a “modified version of the river permits lottery system through recreation.gov” (Commenter 20), referring to several permit systems on Western rivers that allow lottery applications to be submitted in a several-week window before the lottery drawing occurs, giving applicants time to submit a request for a river permit.

Finally, users had many questions about the proposed permit system. Many asked about how to string together multiple sites on a multi-day trip. Commenter 2 asks, “Would you have to book each night individually or would there be a way to secure all the sites in one easy step?” Others asked how duplicate applications could be weeded out, or people discouraged from applying for more permits than needed. One user wondered “can’t a computer figure out how to reserve requests with a lottery system so that staff doesn’t have to work every reservation request?” (Commenter 70). This sentiment came up multiple times, with users expressing frustration with the proposed system while also acknowledging how hard the manual lottery must be for staff to administer. Finding a balance for managers and users is clearly complex, and nuance regarding this tension exists in many comments.

### Equity

The concept of equity was brought up in about half of the comments, albeit in different contexts. Some users were concerned with the use of a system that favours those with high-speed internet or higher computer literacy, as Commenter 13 states:

<sup>1</sup> The authors are not suggesting or theorizing that bots are navigating Recreation.gov. This is an assessment of public sentiment.

*This type of system favors fast computers and fast internet. It will make planning an itinerary a nightmare as 1000s of people are overloading the system at 8 am competing for campsites. The lottery system that allows all applications on received the first day to be treated equally is much fairer and more equitable and sustainable as numbers of applications continue to rise.*

Other users see equity or fairness within the system from a different perspective. References to “gaming the system” were frequent, but other users, such as Commenter 26, saw the fact that reservations open at 8:00 a.m. MST as giving “an unfair advantage to folks in the Pacific time zone who are more likely not to be at work yet” and those working remotely.

While only a few users perceived the proposed system as a positive step towards equity, it is still important to discuss their comments here, as all perspectives are necessary to build a just system. Commenter 34 states:

*Although it's painful to many of us who've enjoyed GNP's backcountry for decades, we must accept that the days of unlimited free access are simply over. Now is the time to implement a system that ensures fair allocation of park access in the future, and a fully electronic system is a foundational first step to do this.*

Another user stated that “this is a more fair option than the previous 1 day lottery method” (Commenter 141). It is clear that equity (or fairness) in this context is perceived differently by different members of the visiting public, and these differences will require much more exploration for GNP staff.

Many users suggested changes to the proposed system to make it more equitable. Some suggested adopting systems that are already in use within the National Park Service, such as Yellowstone’s lottery system, which is also administered by Recreation.gov (paraphrased from Commenter 67). Others had ideas about how to track whether users were submitting multiple applications across several years, thereby emulating a common practice in big game hunting permitting where “successful applicants are typically put at the back of the line among applicants in future years” (Commenter 34). Finally, several users had questions about the system pertaining to equity and fairness. The issue of multi-day itineraries was also raised frequently, but its context varied across efficiency, equity and equality. Commenter 92 asks:

*How will equity be achieved between the advanced large-group lottery and the 1–4 small-group reservations with regard to time of reservation? [...] To maintain equity, will you be spacing the 35 large-group allotments out equally over the entire summer season? If not, the large group reservations allocated as part of the March 1 lottery could make it very difficult to secure any small group reservations in the prime biking season.*

Questions regarding large- versus small-group treatment were also raised in the context of all three distributive justice concepts, highlighting the complexity of these comments.

### Equality

Just two mentions of equality were made with a positive sentiment. Commenter 11 felt that a perceived expansion of the number of walk-up permits would be positive, stating that “giving people access to these wild areas can be an incredible and life changing endeavor. So expanding ‘walk in’ areas will help enable those with the actual drive to do so.” Commenter 22 notes that their family lives far from the park, and this system allows them to “make wilderness camping reservations instead of relying solely on walk-up permits – THANK YOU.” Both of these comments highlight the different perspectives of visitors to GNP; some enjoy the walk-up permit option for access, while others who live far from the park enjoy the advance reservation option.

Others expressed negative sentiments. The number of campers on a small-group permit and their processing order came up frequently within these comments. Commenter 60 pointed out that “my concern with the new system is the cap on 4 people per reservation. I have 3 kids making us a family of 5. Seems silly to need 2 reservations for my family.” Commenter 146 expressed frustration with large-group applications being processed before small groups, stating that “this just has a feel that you are trying to accommodate the commercial guided trips that would have only one trip leader over the smaller, independent non-commercial hikers.” Other users referred to access issues more broadly. Commenter 28 states:

*[I]t is nearly impossible to book a campsite during the height of the season, which leaves the less technologically advantaged individuals behind and effectively denies them access to public lands that are meant to be enjoyed by all. This undermines the fundamental principle of non-discrimination at the core of NPS policies.*

A number of users offered changes to the proposed system that addressed what they perceived as accessibility issues within GNP’s backcountry. While some offered broad suggestions, such as “it is imperative that the reservation system be designed to promote equal access for all” (Commenter 28), others offered more pointed changes. Commenter 61 states:

*I disagree that the groups should have primary access to the sites. As a general rule, groups are harder on the environment than individuals and many parks limit them to protect the natural resources. This plan gives them preferential treatment and 2 chances to obtain their permits. Groups should be limited and not be given advanced access.*

Several other users mentioned the difficulties that through-hikers on the Continental Divide National Scenic Trail would face, with Commenter 119 suggesting that while “these changes might be helpful to those plan-

ning shorter trips”, these particular through-hikers will find it “nearly impossible to secure an itinerary under the new system”. Finally, several users had questions about equal access for different user groups. Commenter 17 asks: “Will reservation.gov be set up for stock reservations as well?” (i.e. for the use of pack animals).

## Discussion

Striking a balance between the distributive justice concepts of equity, efficiency and equality is a complex task (Shelby et al. 1989); understanding a subset of the public’s sentiments surrounding these concepts within this particular reservation system will help advance the field of recreation use allocation and the theory of distributive justice more broadly. While our analysis is only one way to look at this complex issue, it is clear that visitors to GNP have a wide variety of preferences and opinions regarding the proposed transition in rationing. As allocation systems throughout US protected areas become more common and move increasingly online (Hartman et al. 2021), commenters stated that concerns about equity and equality (as they relate to technological literacy, internet access, timing, etc.) will become more salient. At present, it is unclear how managers will be able to strike a balance between equity and efficiency when deciding how to allocate use within these systems: more research is needed to move these decisions beyond historical use and best judgement.

In the meantime, suggested planning principles such as the Recreation Rationing Spectrum (Rice & Phillips 2023) have begun to delve into the potential for the simultaneous use of multiple rationing systems to strike this balance, but more research is needed to guide the creation of potential frameworks. Within the recreation allocation literature, the present research is a small step towards a future framework, a tool that has been notably missing since the research of McCool and Utter (1981). Additionally, this research builds on the theory of distributive justice, and more specifically the concept of *equity* and what that means in the recreation context. As federal guidance on equity and inclusion in public land spaces and land management agencies increases, the theory will need to be investigated further and applied more extensively to better provide fair and equitable access to all public land users.

## Management implications

Four primary management implications emerge from this research which mountain protected area managers may find valuable. First, visitors appear to be generally understanding of the time, workforce and financial constraints of managers as they relate to rationing recreation. This is an important finding, as noted by Lucas (1983), because visitors are more likely to accept, comply and have positive experiences when they understand the constraints of man-

agers and the rationale for policies. Second, visitors have concerns over the equity and equality of non-lottery-based rationing systems, on grounds of time, and of technological and geographic advantages. This adds to the proposition of Shelby et al. (1982) – that those who are able to plan ahead are advantaged by reservation-based systems as “reservations set a premium on planning” (p. 416). Third, visitors seem to recognize the need for diversity in rationing. Though commenters often voiced support for their preferred rationing mechanism, many also appeared to react positively to the proposed model’s specific ways of splitting permits between reservations and walk-ups – in line with recommendations from McCool and Utter (1981) and Rice and Phillips (2023), who suggest the simultaneous use of multiple rationing systems. Finally, visitors have equality-framed concerns over perceived advantages in relation to activity type, length of trip and group size.

## Limitations

There are several limitations of this study, most notably that 156 public comments cannot be taken as representing the entire visiting public. This is a very small sample of potential (and not necessarily actual) GNP visitors. Furthermore, those who took part in the consultation were perhaps more keenly aware than other visitors of the proposed changes, and thus more likely to engage in the public participation process. Additionally, the specific form of *deductive* coding used, within a previously developed theoretical framework, may have limited the number of themes that emerged. It is possible that other themes might have emerged from the data if an *inductive* approach had been used (Lazar et al. 2017). Nevertheless, determining how these public comments are distributed amongst the concepts found within distributive justice is still a critical contribution to the literature on distributive justice, as well as to that on recreation use allocation more broadly. Lastly, it is critical to note that the participants’ comments examined here reflect their personal perceptions. They do not necessarily reflect the realities of the present management of GNP. Thus, the views of how the system will be administered, and technical issues related to its administration, may be incorrect.

## Conclusion

Public access to public lands is not always as simple as it appears at face value, especially as agencies limit (or *manage*) this access. The commenters’ perspectives presented here are useful to further our collective understanding of the complexity of how the public views impacts related to these allocation systems. This research offers key insights for mountain protected area planners as they consider various allocation systems and weigh the impacts on distributive justice. The deep nuances surrounding the connections and trade-

offs between efficiency, equity and equality may pose challenges to managers as they seek “an ideal whereby individuals obtain what they ‘ought’ to have based on criteria of fairness” (Shelby et al. 1989, p. 62). Yet, as stated by Commenter 28, “The National Park Service has a duty to ensure that everyone has a fair and equal opportunity to enjoy the public lands that belong to all of us.”

### Endnote

On 4 December 2023, the National Park Service announced that they would be updating their backcountry permit allocation system once more. This time, they announced they would be reverting to a lottery-based allocation. More information can be found at: <https://web.archive.org/web/20240127135242/https://www.nps.gov/glac/learn/news/glacier-national-park-adds-early-access-lotteries-for-2024-wilderness-permits.htm>

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