



Nov. 25, 2019

Willamette/Deschutes National Forests

Attn: Matt Peterson, Beth Peer

Submitted via email to WillametteRecFeeComments@usda.gov

RE: Forest Service Central Cascades Wilderness Strategies Permit Fee Proposal

Thank you for the opportunity to comment on the recently released **Permit Fee Proposal** (Proposal), as it relates to the **Central Cascades Wilderness Strategies Project** (CCWSP), set to take effect in spring 2020. We recognize the challenges the Forest Service faces with regards to the increased interest in outdoor recreation in Central Oregon's wilderness areas (Three Sisters, Mount Washington and Mount Jefferson), and the impacts that increased visitation has on these special places. As a general rule, and in support of the maintenance required to preserve these areas, we are not opposed to the implementation of reasonable entry limits and usage fees in unique wilderness areas and sensitive natural environments. Through the thoughtful management and stewardship of these wild places, they can provide the public with opportunities to seek adventure, relaxation and rejuvenation in some of America's most beautiful natural areas, while ensuring their lasting quality for generations to come.

Our Objection

As an advocate for Oregon's **Pacific Crest Trail** (PCT) hikers, and public lands and wilderness access in general, we find that the Permit Fee Proposal, in addition to the CCWSP as a whole, is significantly flawed, and hereby submit this formal objection for the reasons outlined in this letter. As currently drafted, the CCWSP comes across as more of a punitive reaction (aggressive limits and excessive fees), instead of a thoughtful solution. It does not address a growing Northwest population, the wilderness recreation interests that come with this population, and does nothing about the inevitable impacts that will arise in the dispersal of a significant number of Oregon's residents and visitors when more than 440,000 acres of wilderness are suddenly and significantly restricted. By taking such aggressive and restrictive action in this way, the Forest Service is contravening its own Wilderness Management

Policy (2323.12):

- 1. Maximize visitor freedom within the wilderness. Minimize direct controls and restrictions.**
Apply controls only when they are essential for protection of the wilderness resource and after indirect measures have failed.
- 2. Use information, interpretation, and education as the primary tools for management of wilderness visitors.**

While we have concerns about how this Proposal will impact the outdoor community as a whole, our primary objections relate specifically to the burdens and restrictions it will place on PCT **section-hikers**. These are hikers who prefer to travel the PCT in smaller portions (as opposed to those who attempt to hike the entire PCT at once, commonly called **thru-hikers**). Section-hikers typically go out for one to several weeks at a time, and cover distances up to several hundred miles. Similar to their longer-distance fellows, PCT section-hikers depend on reliable access, flexibility and freedom of movement through Oregon's wilderness areas to safely execute their hiking goals. If enacted as outlined in the CCWSP—through both crushing entry limits and excessive permit fees—it could effectively eliminate the feasibility of section-hiking the PCT in this region of Oregon, and have a detrimental effect on the Northwest hiking community. With that, we submit the following objections:

- 1) The Proposal creates an economic barrier for accessing public lands.
- 2) The Proposal structure discriminates against the type of wilderness user.
- 3) The Proposal is incomplete in that it doesn't fully articulate how the system works.
- 4) Fee revenue only adds bureaucracy, and does not invest in wilderness improvements.
- 5) The Proposal limits access to permits, and relies on outmoded methods.
- 6) Retroactive concerns with the daily trailhead permit quotas.

1. Economic Barriers

Under the current Proposal, fees would be collected from various wilderness users based their preferred method of recreating—day use versus overnight use—and be determined by the number of eligible users recreating in these wilderness areas. While the individual fees themselves may be considered minimal, at \$3–\$5 per person (plus the associated reservation system fees), this could be a cost barrier for families, groups and low-income persons seeking access to their public lands, where previously there was no cost, or simply the cost of a parking pass. Until now, a family or group could have unlimited access to hiking on public lands with the purchase of a \$35 annual NW Forest Pass. Under the new Proposal, that sum may now only allow one or two outings. If a family of four previously took ten summer hikes with their \$35 NW Forest Pass, the charge they could now be faced

with to do the same ten hikes could be in excess of \$150. This is a significant enough amount to make the average user question the value of this cost, and would likely eliminate low-income residents from being able to afford access to their public lands.

With regards to PCT section-hikers, who typically take an average of eight days/nights to traverse all three wilderness areas (110 miles), the per-person, per-night fee skyrockets to \$40+ for a single hiker. For a pair of hikers, that amount climbs to \$80+; three hikers to \$120, and so on. This is prohibitively expensive—and simply unprecedented—for accessing public lands. And those amounts don't even include the additional reservation system fee. These excessive fees could have a similar impact on other longer-term wilderness users as well, e.g., hiking the Sisters Loop, etc. In its current form, the Proposal does not consider these user groups by implementing a reasonable limit for permit fees so that users can traverse these wilderness areas without getting gouged with excessive costs. This presents another significant barrier to accessing our public lands, and essentially turns wilderness access into a commodity to be enjoyed only by the economically favored.

Recommendation: We suggest that the Forest Service establish a reasonable overnight permit fee cap for single persons (e.g., \$30) and groups (e.g., \$50) seeking extended access to these wilderness areas as part of PCT section-hikes and other longer journeys, that do not create an exorbitant economic burden.

2. User Discrimination

As currently drafted, the CCWSP and associated Proposal, gives an unfair deference to PCT hikers holding a Pacific Crest Trail Association (PCTA) issued long-distance permit.¹ These hikers will be permitted freedom to access these wilderness areas at-will, with no permit fees, and are only subject to minor camping restrictions. Conversely, PCT section-hikers wishing to cross the same wilderness areas, but not holding a long-distance permit, will be subject to disproportionate access limits (see Quota Concerns) and potentially excessive permit fees (see 1.). This creates a gross discrimination among PCT users, as long-distance thru-hikers (most not even Northwest residents) should not be any more entitled to access the PCT than local hikers. Additionally, while thru-hikers are typically speeding through Oregon as quickly as they can to complete their hikes before the winter snows hit Washington—and are often notoriously frugal—they contribute little to local economies. Conversely, section-hikers in Oregon, who are typically more planful about their hikes, forming them around limited vacation times, are much more apt to take advantage of the services and amenities at gateway communities, and contribute more to local economies. Considering these additional factors,

¹ This permit is issued to hikers traveling 500 or more miles on any section of the Pacific Crest Trail. Containing only 455 miles of trail, Oregon's PCT hikers do not qualify for this permit. This is a separate issue that should be addressed in order that all three PCT states (CA, OR, WA) offer equitable access to all PCT hikers.

it seems unjust that local hikers are restricted from their own wilderness in favor of visitors.

Recommendation: Since the PCTA is not likely to impose a fee on long-distance permit applicants—something that would be entirely appropriate for them to contribute to the maintenance of the trail and the lands it crosses—the Forest Service should establish a PCT Corridor Pass along the lines of the Skyline Permit initially proposed in the CCWSP's earlier Draft Decision. This is especially in light of the fact that the section-hiking user group previously covered by the Skyline Permit was not reincorporated into the general user group when this concept was scrapped. A PCT Corridor Pass could be offered at a flat per-person fee (e.g., \$30/\$50 as noted above), and provide similar access freedom and flexibility as the PCTA long-distance permit. These permits could still be subject to limited daily entries (we recommend at least 30 individuals), but would ensure that both section- and thru-hikers have equitable access to traverse these wilderness areas to complete their hikes.

3. Incomplete Proposal

As it is currently drafted, the Proposal is missing significant details about how the permit fee system will actually work, specifically with regards to: 1) When users can apply for permits; 2) What percentage of permits will be available to reserve, versus walk-up and/or day-of availability; 3) Changes of hiking plans and cancellations; 4) Preventing abuse of the permit system, e.g., permit hoarding; 5) Ensuring that cancelled/unused permits—especially day-of cancellations or no-shows—will be made available in an effective manner. In conversations with Forest Service staff at recent public open houses regarding these concerns, most questions only received vague answers, with the common response being, "We're still working out those details," or, "We're looking for public input to make those decisions." In some cases, different staff gave completely contradictory information about their understanding of some of these aspects. As such, the public still has little idea about what the Proposal fully entails, how it will affect access to these wilderness areas, and how to properly respond to it to suggest changes and/or improvements. This is simply unacceptable, and gives the impression the Forest Service is attempting to rush out an incomplete plan that will only raise more issues and cause more confusion and problems in the future.

Recommendation: We would like the Forest Service to fully outline both the fee structure and how the system will work in its entirety, including, but not limited to, the concerns listed above. Only then, with the release of a complete Proposal, give the public an opportunity to review and comment on how it may affect access to these wilderness areas without so many to-be-determined holes to fill.

4. Permit Fee Revenues

It is of significant concern that the language in the Proposal with regards to how fee revenues will

be used is notably generic, and mostly suggests an increase of Forest Service staffing. If the Forest is going to be receiving a windfall of new revenue, it would be ideal to reinvest a portion of these funds into the actual improvement of these forest areas and expansion of wilderness opportunities, instead of just inflating the Forest staff for ambiguous “education and enforcement.” The number of people moving to the Northwest, and seeking recreation and relaxation in Oregon’s wild places is not going to diminish, so taking a more proactive approach to maintaining and improving the forest infrastructure to keep up with local and tourism recreation needs will prevent the need to take even more drastic and restrictive actions in the future.

Recommendation: We suggest some permit fee revenue could be utilized to:

- Improve parking, signage, restrooms and trash collecting facilities at trailheads
- Establish designated camp areas in known, popular wilderness locations
- Install composting, low-profile wilderness privies in high-impact camp areas²
- Construct new wilderness trails to disperse crowds and increase opportunities
- Proactively address impact issues sure to arise from user dispersal
- Work with local communities to promote forest stewardship and Leave No Trace

5. Permit Acquisition

As currently outlined, the Proposal requires all permit seekers to obtain their wilderness permits via the recreation.gov website. There are numerous problems with this approach. First and foremost, it presumes that all users will have access to the internet. That may not be the case for low-income residents or Oregon visitors, and it is known that there is no internet access at a majority of the trailheads in these wilderness areas. Considering that, it’s entirely possible that many users interested in securing a permit for their trailhead of choice will not be able to. Then when a permit is secured, the system requires a physical printout of the permit (and accompanying parking pass) to be obtained. This only presents another barrier for those who may not own a home printer, or those who may be traveling and not have access to a printer. These are conflicting requirements, first requiring permit seekers to be internet savvy, then directing them to an outmoded process—not to mention resource-dependent and waste-producing. Forest Service staff have indicated that permits may be obtained and/or printed from local Forest offices, but only during their limited hours/days of operation.

Recommendation: If the Forest Service is going to make users compete for wilderness access and pay multiple fees to do it, it would only be appropriate for the process to be as simplified as possible, especially in today’s increasingly mobile-friendly and environmentally-conscious society. Users

² These facilities have proven effective in areas such as the Alpine Lakes Wilderness and Mount Rainier National Park for reducing human waste pollution. And newer liquid/solid separating privies are proving to offer extended usage lifetimes with lower maintenance needs.

should be able to download their permit and carry it on their mobile device to contribute to less resource dependence and waste. Users should also be able to enter their auto information as part of their permit application for parking at the trailhead and avoid the need to print even more paper.³ In addition, if the Forest Service expects users to adhere to these new permit requirements, it should modify its office operating hours to be open during the most popular usage times—weekends and holidays—and make sure staff are available to accommodate visitors' permit needs.

Quota Concerns

Following a conversation with Forest Service staff, it was shocking to discover that the daily trailhead quotas as outlined in the CCWSP Final Decision were not as they appeared—and were, in fact, significantly more restrictive than presented to the public. This seems to be rooted in some confusion about the Appendix C references between the Final EA and the Final Decision. While the Final EA suggests quotas that take into consideration both trailheads and users in the area⁴, no such language or reference to that effect was carried over into the Final Decision. When Forest Service staff were asked why such a significant factor relating to daily permit quotas was not included in the Final Decision, the response was “a simple oversight.”

This is more than an oversight. This presents a potentially impossible and punishingly restrictive situation with regards to PCT section-hikers, and effectively reduces the number of wilderness entries from a daily basis to a weekly basis. For example, according to the Final EA, if three section-hiking groups obtain permits to enter the wilderness area via Irish-Taylor Lakes⁵ on any Friday, and each get 8-day permits to cross all three wilderness areas, there would be no further permits issued for the following 7 days, until it was presumed these parties exited the wilderness areas. In essence, this would only allow three groups of users exclusive access to 110 miles of the PCT for an entire week. Since most section-hikers travel solo or in pairs, this would mean ***limiting entry to as few as three users over an area of 110 miles for an entire week.***

This is simply unacceptable—and unjustified. There is no basis for this kind of restrictive approach—especially one so targeted at a single type of wilderness user, especially considering the aforementioned long-distance permit holders who are granted at-will access. When these discrepancies and concerns were raised with Forest Service staff, the response was simply, “That is something we will monitor and may address with ‘Adaptive Management’ (Final Decision, Appendix

³ The Digital Recreation Day Pass is used in the Columbia River Gorge, and lets users purchase and download their user permit and auto information (<https://www.recreation.gov/sitepass/72635>).

⁴ “Group quotas for overnight camping are not based on daily launches, but rather the number of groups that can occupy an area at one time. For example, if a group leaves from a trailhead for four nights, those four days are removed from the quota for that trailhead until they return.” (CCWSP Final EA, Appendix C; Pg. 164)

⁵ According to the CCWSP Final Decision, Appendix A, the current permit quota for Irish-Taylor Lakes is three group entries per day; the northern entry point, Breitenbush Lake, grants four entries per day.

C)."We have raised this concern with the Pacific Crest Trail Association and they were equally taken aback by this blatant omission. At the recent Proposal open house sessions when this issue came up, attendees were—naturally—outraged by this lapse in full transparency. It questions the legitimacy of the entire Final Decision in that it is apparently not genuine in its presentation of accurately informing the public what the "daily" quota system actually entails.

Recommendation: We strongly urge the Forest Service to reconsider their approach to the daily quota allowance. By implementing trailhead quotas in conjunction with area quotas, it will exponentially reduce the public's ability to acquire these new permits and access their public lands—much more so than the established restrictive quotas, which were believed to be "daily" entries. As these quotas affect overnight users and PCT section-hikers, we suggest that the Forest Service identify ONE quota method, either: 1) Daily limited entries at affected trailheads; OR, 2) Daily limited access to specific destinations. Specifically with regards to the two PCT entry points (Irish–Taylor Lakes and Breitenbush Lake), we feel that these permits should be issued on a per-person basis instead of by group (i.e., change 3 groups to 36 individuals).⁶ This would ensure that more section-hikers would gain access to cross these wilderness areas.

We also believe the Forest Service should, in the interest of transparency and maintaining goodwill with Oregon's outdoor community, amend the Final Decision and resubmit to the public for review considering ALL the quota details and limits that the Forest is considering. If left as-is, we only see this issue blowing up with frustrated hikers who will simply ignore this new permit process, and harbor animosity toward a government agency who simply appears to be trying to bar the public from their own lands.

In Conclusion

At a time when more people are moving to the Northwest, and seeking recreation and relaxation on Oregon's public lands—and taking advantage of the health benefits these opportunities afford—it's time to find solutions that help, not hinder, access to these wild spaces. It will take thoughtful and creative solutions, in cooperation with the public and concerned parties. And while the Forest Service instinctively defaults to the guidance of the Wilderness Act, it may also be time to consider the Act's intent and purpose as it relates to modern society and current wilderness recreation interests. After all, the Wilderness Act was implemented nearly a half-century ago, at a time when wilderness recreation was a fringe activity and not in the mainstream. It may be time to abandon the romantic and bygone notions of solitude in the wilderness, and implement more thoughtful management

⁶ According to the CCWSP Final Decision, Appendix D, the average group size is 2.5 individuals. In the situation of only three group entries per day, this would equate to just 7.5 individuals. Since PCT section-hikers typically travel solo and pairs, it is entirely likely under this system that a single (1) hiker could occupy an entire "group" permit.

efforts that address the wilderness recreation interests of modern society, with more proactive solutions that maintain the integrity of these areas. We hope that the Forest Service will consider some of these concerns and recommendations as it seeks to implement the CCWSP in 2020. We would welcome the opportunity to continue this dialog in order to find a suitable resolution that ensures that Oregon's PCT section-hikers continue to have equitable access and opportunity to hike across this spectacular state, and that all of Oregon's wilderness enthusiasts can enjoy these places today, tomorrow and into the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Eli Boschetto".

Eli Boschetto

PCT: Oregon

About PCT: Oregon

Not all Pacific Crest Trail hikers have the freedom, interest or ability to take 5–6 months away from home to hike 2,660 miles across the Western United States. This is the premise behind the Mountaineers Books guide series, *Hiking the Pacific Crest Trail*, which provides information and inspiration to the “average hikers” who seek to find adventure on the Pacific Crest Trail, but on their own time, and at their own pace. [PCT: Oregon](#), founded and directed by ***Hiking the Pacific Crest Trail: Oregon*** author Eli Boschetto, serves as a resource hub for Oregon's Pacific Crest Trail hikers, and advocates trail safety, responsibility, sustainability and Leave No Trace ethics.

Eli Boschetto is the author of two additional Oregon hiking guidebooks, *Urban Trails: Portland* and *Day Hiking: Mount Hood* (available 2020). Eli has served as the editor of *Washington Trails*, and is a former Northwest correspondent for *Backpacker*. He is currently an advisory board member of the Oregon Trails Coalition, and a brand ambassador for National Geographic Maps and SPOT Satellite Communicators. In 2018, Eli was a member of the Granite Gear Grounds Keepers and collected trash on more than 500 miles of Oregon's trails, including 200 miles of the PCT. Eli lives and operates PCT: Oregon from his home in Portland, Oregon.