**To: Forest Service**

**Re: Central Cascade Wilderness Strategy**

**Summary**

There are a number of shortcomings to this proposed restricted access proposal. At a minimum, the Forest Service should revise the approach with much greater sensitivity to user access to discrete areas rather than “wilderness wide” -- the local area impact is masked by your documentation. My comments focus on day hike use as that is my larger experience having hiked many of the affected trails over a number of years.

The Forest Service should revise this approach to narrow the scope to a set of experiments to learn from implementing alternative solutions – to gather the evidence that is lacking in this proposal.

**Problem to Solve**

What problem are you trying to solve?

* Not a significant revenue source unless this is a slippery slope to regular fee increases. The $3 permit plus the website processing fees is a nuisance tax that likely will generate more revenue for the website vendor, Booz Allen Hamilton, than monies to support wilderness improvements. If your analyses say otherwise then publish your revenue goals.
* The solitude and inspirational experience goal isn’t a compelling one given myriad interests across hikers. And, the displacement impact runs counter to this goal.
* Protecting the wilderness from damage due to overuse is a good goal but no trail-specific evidence is cited to indicate that this plan will achieve that interest. And, there are other tactics to achieve the goal like re-routing trails, targeted area closures to regenerate areas, eliminating activities that have the biggest impacts on select trails/locales (e.g. running clubs, very large hiking groups, horses, camping), more structured parking (e.g. fencing/log barriers) to self-regulate number of concurrent users and best of all – build new trails. It would be reasonable to close the most vulnerable or damaged trail in a trailhead cluster area if there was a proven negative impact and committed resources to restore the trail.

I challenge the Forest Service’s construct for this decision-making and suggest you rethink the second of your two goals:

1. lasting system of quality wilderness
2. opportunities for solitude, challenge, and inspiration,

This proposal lacks insight into your customer segments – the subgroups of people who use the trails.

I’m doubtful that many users would prioritize a need for John Muir-like rapture when on day hikes. I’d hypothesize that most day-hikers enjoy and would prioritize many other aspects of the outdoors including:

* companionship (in sharp contrast to solitude) as many hike in small groups, are families with children, bring dogs etc. And, are re-assured to briefly connect with other hikers as remote trail sections can be intimidating for some
* exercise
* learnings like identification of trees, flowers, animals, geology
* self-reliance: trail navigation, overcome obstacles (e.g., log bridges), monitor weather
* visual wonders like seeing vistas, coursing water, rock formations etc.
* change-up from daily routine: disconnect from phones/electronics

My premise is that most day-hikers do not object to the modest numbers of other hikers they encounter on the trail. If you have evidence to the contrary please detail it in your documentation. And, for those who seek solitude there are ample ways to get that even on high traffic trail days like the Tam McArthur Rim hike you describe – when I do this hike, I continue pass the point where >95% of hikers turn at the wonderful promontory and enjoy the inspiration and solitude you note as I approach Broken Top. The day-hiker segment that seeks this experience can find it on virtually all of the proposed restricted access trails by hiking a bit farther, starting earlier, etc. And, more importantly, we know that people “protect the things they love” so are delighted to see people out on trails knowing that many of these folks will support your mission. Have you considered how many people will not experience the wonder of the Jack Lake Hike meadow wildflowers -- the direction your proposal leads ultimately will doom your mission.

**Physical Impact on Environment**

The Forest Service cites the need to reduce recreation-related impacts – this is a compelling interest and should be given the highest weight. It’s reasonable to limit access to areas that are being damaged due to traffic but your documentation doesn’t explain if and how this criterion was applied rather it appears that you are using trailhead entry counts as your key metric? For instance, it’s unlikely that the day-use hikers are damaging the McKenzie Pass PCT trail to Belknap – most of this trail is lava rock that will be there when the next glacier returns…

What is your success metric for reducing impact along trails and how will you be accountable to the public to inform people of the progress?

**Displacement**

“Our decision for day use limits includes all of the highest-use trailheads. Five trailheads rated as high potential to receive displacement from this Alternative will become the focus of monitoring efforts. In order to help inform this work, our analysis demonstrated the amount of people or groups that could be affected by trailhead quotas.”

The proposal is silent on the displacement analysis cited above – did it tell a story that didn’t advance the rationale for this proposal? The “solution” is to monitor the trails that are expected to incur the impact of displacement. What is the long-term forecast – to place limits on all or most trails as the displacement amplifies the use of nearby trails? The recent fire impact on trail use and displacement likely is a good predictor of what is to come…

**Remaining Day Use Hiking Opportunities**

The analysis underlying this proposal is not structured to present the public with the true impact of these limitations. The analysis should be reworked to present the impact by “trailhead entry clusters” that reflect trail options by travel time/access to these areas. For instance in the Three Sisters Wilderness, day use of the McKenzie Pass versus the Cascade Lakes trails are very distinct options with travel times to trailheads that differ by anywhere from 1-3 hours depending upon a person’s starting point (under this proposal “day use” becomes an oxymoron when travel times to a desirable trail increase 2+ hours…).

“Alternative 3 Modified imposes day use limits for day use at 24% of the trailheads in the Mt. Jefferson, Mt. Washington, and Three Sisters Wilderness areas. We feel that including the highest-use trailheads is necessary and the best course of action to contain the impacts we’re seeing from increased visitation. The decision will allow a large number of the wilderness trailheads to remain free with unlimited access for day use.”

This is misleading statement:

* The viable trails in the Wychus Creek watershed, McKenzie Pass and Metolius watershed have been materially reduced by wildfire in recent years – while some number of these trails are open they are particularly unpleasant during the heat of summer with little tree cover/greenery and per the most recent fires, ash surroundings.
* A number of the hikes excluded from this proposal are not appealing to many day hikers for various reasons including short distances, they don’t approach the “opportunities for solitude” you purport to advance, and/or lack a point of interest/vista/water/mosquito etc.
* A much more meaningful and telling metric would be: of the annual total day hikes in each trailhead cluster area, what proportion of those hikes require permits.

As an example, of the ~12 hikes in the McKenzie pass, with this proposal, 75% of the day use options are curtailed either due to special permits or fire. The remaining 3 unimpacted hikes are short – ideal for families and those people who are unable to walk distances but certainly not meeting “opportunities for solitude” or those seeking a moderate length day hike. If you evaluated access to trails in the Wychus/Pole Creek and Metolius watersheds the results would show similar, severe restrictions to unfettered access.

**Free and Unlimited?**

“The decision will allow a large number of the wilderness trailheads to remain free with unlimited access for day use.”

What does this statement mean as there have been day-use fees in place for years for a number of these trails and currently a user either buys a pass or pays $5 daily fee. A hiker could access certain trails (60?) in these 3 wilderness areas at no-cost but would need to buy a pass and/or pay daily use fees to use trailheads on immediately adjacent Forest Service lands? But, you are replacing the $5 daily fee at these restricted access trails with the new permit fee? This fee system is confusing and complex – which translates to major deterrents to using the trails.

Q.Some wilderness trailheads require the payment of a $5-day use fee or displaying the Northwest Forest Pass, a Senior Pass, or other recreation pass; if I pay the special recreation permit fee, will I also have to have a recreation pass or pay the day use fee?

A. No. Any visitor with a valid wilderness limited entry permit and who has paid the special recreation permit fee will not need to pay any trailhead fees. The permit will come with an attachment that can be left on the dashboard of the vehicle to show that no additional payment of fees is required.

The Q&A doesn’t address the corollary issue – if a user has an annual/other pass does that user incur the cost of special recreation permit fee too?

**Permit Administration**

“For those trailheads that will have limited entry, it is our commitment to allow for a portion of permits/use to be reserved in advance and the remainder to be available on the day or day before a trip starts; for day use, the majority of permits will be available shortly before the trip starts. For overnight use, the majority of use will be reservable. This would allow even more opportunity for locals and visitors alike to access some of the most popular trails during peak season *without much advance planning*1. These specifics are outside the scope of this Decision Notice, but we are including it here because it consistently came up in public comments.”

Paying the fee and obtaining a day use permit requires the user to have a credit card, internet access, and a printer to print the permit ticket to be displayed in the vehicle. This clearly requires advanced planning and committing to a trail before weather and other conditions are known. These are particularly high barriers to trail use for visitors to the area.

Thank you for reading my perspective.

Ted von Glahn