

Comments on Fee Proposal for Central Cascades Wilderness

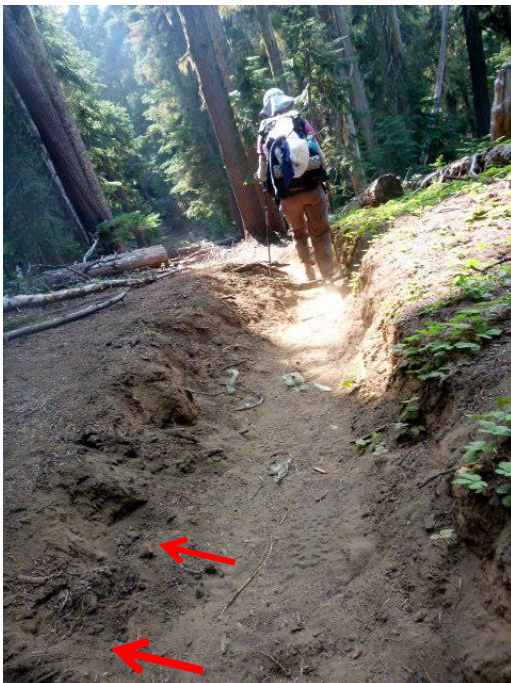
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I have reviewed the Press Release and would like to offer the below comments. I commented during the scoping phase, responded to the EA and was also an objector to the decision.

The fee structure (stewardship fee) as presented seems to be an attempt to cover the ecological impacts of various uses, but it really fails to account for a large range of varying impacts of different Wilderness user types.

-There currently are no fees for horses and equestrian use of trails entering the Wilderness (other than a fee for the rider). It is very well documented in the science (recreation ecology) that horses have significantly higher impacts as compared with other trail users (hikers and trail runners in Wilderness). From the draft Decision Notice: "Equestrian use, while low, is not without impacts. Best available indicates that horses have larger impacts than hikers including soil compaction, vegetation loss, spread of weeds, trail incision and widening, soil loss, and nutrification of soils". Equine use of Wilderness also requires special and larger parking and thus more cost to develop and maintain such. As a professional trail consultant I have studied trail impacts and worked directly with Recreation Ecologists on trail assessment and management recommendations on FS lands. Without question, the impacts of horses on public lands are much larger than other user groups on a one pass to one pass basis and also as an

aggregate basis. The reasons are many: size and weight of users (horse weight is over 1,000 lbs.), contact patch with trails and related PSI (horse hooves are small and have a really high PSI), alternating contact means PSI fluctuates, relative hardness of contact patches (running shoes/hiking boots vs. a metal shod horse) and physics of propulsions (the forward motion of horses walking creates a digging effect).



Left: Horse impacts are clearly seen in this photo from Jefferson Wilderness. Trail incision, hoof marks on outside of trail tread, trail widening etc.

This speaks to direct impacts of horses (vs. other users) to trail treads but there are other impacts that need to be considered. Biological loading on the landscape is much higher with horses in the form of urine and manure (solid waste) spread as horses travel on trails and across landscapes. There is also a lasting social impact as horse manure takes a long time to break down, and so sits in the middle of trails. Dr. Rocky English of Clemson University found e-coli in every stream crossing on horse trails as a result of horse excrement in the waterways. Horse camps in the backcountry or Wilderness also have significantly higher impacts as compared with backpackers. This is due to horses trampling vegetation or soils (after veg has been removed), gnawing on trees, spread and proliferation of straw for feed and other impacts. In comparison, the typical PCT hiker stays in one campsite for not very many hours before breaking camp and getting back on trail.

Below: The impacts of horse camps are very evident in these photos from Jefferson Wilderness 2018. Straw proliferation, trampling and loosening of soils, and more.



Trail riders (especially those doing a through ride of the PCT or a section ride) often have 2 or more horses, one to carry the rider and others to carry gear. This only increases the impacts of horses in Wilderness, both on trails but also in camp areas. The practice of 2 horses per rider is also common when training or breaking in a new trail horse.

It should be noted that I fully support pack and saddle use (equine) in Wilderness and on public lands, and fully understand Wilderness represents an important opportunity for equestrians. However if the FS is going to charge a stewardship fee to Wilderness users to offset ecological impacts, then horses should have a fee and it should be per horse for day use and a higher fee per night for camping use.

Suggested fee for horses: \$5 per horse per day for day use, and \$5 per night for each horse staying in Wilderness for overnight trips.

-Dogs also have a large impact on Wilderness areas: on trail and off, on leash and especially off leash. Impacts include: Wildlife disturbance (especially off leash dogs), impacts to water quality through sedimentation issues related to ingress and egress of dogs getting in waterways (lakes, streams, creeks),

dog poop not picked up and carried out by owners (biological loading), and social impacts to other users. Similar to horses, all dog owners should be charged a fee for each and every dog they plan to hike, trail run or trail ride (equestrian) with. Fees should however be far less than horses as the impacts are not as great. Suggested fee: \$2 per dog per day.

-The above is an attempt to recognize higher impacts of some users, and lower impacts of others. A solo trail runner is very little impact to trail treads and other impacts to Wilderness vs. a group of equestrians (and higher impacts if more than one horse per human visitor), or solo trail runner compared with a hiker and 3 dogs. FS needs to be looking at aggregate impacts and stewardship fees need to take that into account.

General comments:

-Fee structure combined with required permits is a large barrier for underserved communities and lower income families and individuals. Fee and permit programs seem to favor wealthy and retired who have both the money and time to afford Wilderness entry.

-Charging no fees for overnight use except at the 19 targeted trailheads (that have day use permitting limits and fees) would seem to further disperse user loads and not treat all Wilderness experiences, backpack locations and destinations equally. Fee areas (19 trailheads) would become premium locations and some visitors would still choose and prefer these locations, while others may opt out of fees and go elsewhere thereby distributing use and reducing aggregate impact. Recommendation: Drop the overnight fee at all trailheads except the targeted most heavily used 19 trailheads where day use permits and fees are being required.

-FS still has presented no accounting on how money would be spent and how it plans to enforce permits and fees. At the OR Trail Summit this fall a FS official from DNF reported 100% compliance to self-issue permits if a Wilderness host was present, but that dropped to 30% if no host was present. How then will FS monitor and enforce permits and fees? What happens when a backpacker expecting increased odds of getting the camp spot they want cannot, and that site is filled with a non-permitted user who has paid not fees?

-FS should develop a program in which trail and Wilderness volunteers could earn a free pass to visit any Wilderness area from any trailhead for a year for a certain number of hours of Volunteer work. Volunteers receive a NW Parking Pass for 16hours of service, something similar needs to be developed. This would encourage more volunteerism and show appreciation of volunteers. Without such a program, volunteers may perform trail work in Wilderness one day and not be able to get a permit (due to the limits) the day after volunteer work or have to pay a fee for a day hike. This is not fair at all. I know friends who volunteered for the Wilderness Trailhead host program in 2019 who do not plan to return for 2020. Current trend of increased permits and fees will drive away volunteers unless FS can figure out some awards program and those same volunteers don't have to compete with every other user in a limited entry permit system.