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November 22, 2019

Via email [WillametteRecFeeComments@usda.gov](mailto:WillametteRecFeeComments@usda.gov) and via First Class Mail  
Willamette National Forest  
Attention: Recreation Fees  
3106 Pierce Parkway, Suite D  
Springfield, Oregon 97477

**RE: Central Cascades Wilderness Strategies – Recreation Fee:  
Comments of Jessica Beauchemin**

Dear Willamette National Forest:

On behalf of Jessica Beauchemin, enclosed for submission on the Central Cascades Wilderness Strategies Project – Recreation Fees issue, please find Ms. Beauchemin's comments for your consideration.

Should the comment deadline be extended, or if additional materials become available, Ms. Beauchemin reserves her right to modify, amend, supplement, or re-submit her comments.

Please contact me if you have any difficulties accessing the enclosed comment document.

Sincerely,

*s/ Elisabeth Holmes*  
Elisabeth Holmes, Attorney  
Blue River Law, P.C.

Enclosure  
cc: Jessica Beauchemin

November 21, 2019

Via email [WillametteRecFeeComments@usda.gov](mailto:WillametteRecFeeComments@usda.gov) and via First Class Mail

Willamette National Forest  
Attention: Recreation Fees  
3106 Pierce Parkway, Suite D  
Springfield, Oregon 97477

### **Comments on the Central Oregon Wilderness Fee Proposal**

To: Willamette National Forest

I am writing to argue **against** the creation of a new special recreation permit fee to access the Central Cascades Wilderness.

Hiking and dispersed camping in wilderness is one of the simplest ways to enjoy recreating on our public lands. They are activities that provide access to a large number of people, with little specialized gear or knowledge necessary. Since the Wilderness Act became law in 1964, these activities have been open to the public for free. This proposal aims to change that.

I have several issues with the proposed fees:

**1. The categorization of day hiking and dispersed backcountry camping as a “specialized use” of the forest is an inappropriate interpretation of the FLREA: “(h) Special recreation permit fee. The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use.”**

Taking a walk for a few hours is absolutely NOT a specialized use. Backpacking into a remote area with no amenities or reservable sites is NOT a specialized use. If you want to limit and permit sites at Green Lakes, permit sites at Green Lakes. Don't lump every single overnight use into one broad category. There are more places in wilderness that are not over-used than places that are. The brush is too broad; charging for overnight use in under-utilized areas is likely illegal and will be challenged if pushed through.

According to Forest Service spokespeople at the Bend public meeting, the Maroon Bells permit system set the precedent for using the Specialized Use designation to charge entry to wilderness. But that system covers a tiny land area and does NOT create entrance fees for day use. This is not a legitimate comparison.

**2. No projection of how the fees collected will be budgeted towards the stated uses. I find this is a huge oversight. I have read that the dollar amount for the fees was chosen based on what the Forest Service thinks people will pay, not based on how much value the fees will provide back to the user, the Forest Service, or to the public as a whole. I have not done the math myself, but I find it very hard to believe that the amount of money generated from this fee program will be able to do all this effectively:**

“Under Federal Lands Recreation Enhancement Act, 80 to 95 percent of the proposed special recreation permit fees would be invested in **wilderness management activities,**

**trail maintenance, visitor education and expanding work with volunteers and partners** within the three wildernesses.” *From the CCWS Frequently Asked Questions*

So then, the Forest Service is making the claim to the public that the fees will provide funding to do all of this additional work with no assurance that there will be enough funds to accomplish the task. Besides, what ever happened to the revenue generated by the Northwest Forest Pass? That was supposed to take care of maintenance issues.

3. The fees disproportionately impact human users and do not take into consideration the deleterious impacts of dogs and horses. Under the proposed fee structure, a family of 4 taking a 2 hour walk in the woods would have to pay more than the same family traveling with 4 horses and 4 dogs. The numerous ways that stock and pets impact the land and user experience is well documented in the research. And yet, there is absolutely no fee to bring these animals into the wilderness? Horses impact soils and trails, spread weeds and eat native vegetation. Dogs, which are often off-leash despite any rules in place otherwise, chase and scare away wildlife, harass other hikers and dogs and contaminate water and soils with their feces.

If fees are being imposed to offset impacts, then fees **must also apply to dogs and stock.**

4. The fees, in addition to the logistical barriers already in place for the quota system, add another hoop to jump through for underserved communities. The Forest Service’s answer of “we’re working on it” is not good enough. At a recent National Wilderness Conference held in Bend, there was an entire session dedicated to asking the **attendees of the session** to come up with a plan to help diverse communities access free passes. This was outrageous. Time, as well as money, is a finite resource. If someone, who previously could just drive to a trailhead and start walking, now has to take time to navigate the quota system online as well as figure out how to access a free day pass to walk in the woods just 30 minutes from home, that is a system that does not serve the public.

5. The limited entry quota system for 2020 has already generated a lot of anger and distrust among hiking and climbing groups. Most of my hiker friends are focused on figuring out how to get around the system so they don’t have to pay. Without public buy-in, the system doesn’t work. It will just be another set of onerous rules to ignore. The fees are the last straw for many.

Most of the alleged impact on the land could be mitigated by people following the rules that are already in place. But those rules are not enforced; putting more **unenforceable rules** in place will not create the positive impact the Forest Service alleges. The Forest Service simply CANNOT monitor 79 trailheads for overnight use and 19 for day use. The current LEA system includes two trailheads; two is manageable. Nineteen is not. There are over 400,000 acres of land included in the three wilderness areas that the 79 trailheads provide access to. Dispersed camping means you can plop your tent anywhere across these lands. No amount of rangers can patrol that wide of an area.

And the unintended consequence is getting groups of avid hikers and outdoorspeople outraged at the “system.” I, for one, would love to continue volunteering with the Forest Service and contribute to protecting our most valuable resources, but not if this fee system comes into play.

In conclusion, I argue that there ought to be **no special use fees** attached to the limited entry permit. If however, a fee system is put into place, then it must include stock animals and dogs.

s/ Jessica Beauchemin

Jessica Beauchemin

Bend, Oregon

Email: [beauchemin.jess@gmail.com](mailto:beauchemin.jess@gmail.com)