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Organization:

Title:

Comments: FW: Recreation Fees

I am forwarding these comments from the BFR NEPA comment inbox.

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Caring for the land and serving people

From: Kim McCarrel [mailto:kim@nwhorsetrails.com]

Sent: Sunday, November 24, 2019 6:18 PM

To: FS-comments-pacificnorthwest-deschutes-bend-ftrock <comments-pacificnorthwest-deschutes-bend-ftrock@usda.gov>;

Subject: Recreation Fees

We are providing comments on behalf of Oregon Equestrian Trails (OET), an all-volunteer non-profit organization whose 900+ members are dedicated to maintaining trails and horse camps and preserving equestrian access to our public lands. Many of our members regularly ride their horses in the Central Cascades Wilderness areas, so we have a keen interest in the proposed recreation fees and related issues.

Proposed Fee, Day Use: OET members were unable to reach consensus regarding the proposed day-use fees, as our members have very diverse opinions on the issue. Many of our members believe the proposed fee is about right, while other members feel strongly that equestrians should not pay a fee at all.

The latter group's rationale is that equestrian trail activity in Wilderness areas has decreased somewhat over the last 15 years, while hiking and backpacking activity has exploded. Since there has been no increased equestrian

activity to contribute to the overuse that is causing the deterioration of our Wilderness areas, these members feel that access fees should not be imposed on equestrian activity. Others feel strongly that charging fees to access our public lands is inappropriate at any level, as it turns the Forest Service into a concessionaire and goes against many of the Forest Service's own rules and the intentions of Congress.

Proposed Fee, Overnight Use: Again, OET members could not reach consensus on this issue. A slight majority of our members feel that the proposed fees for overnight use are reasonable, while others say these fees are too high, and still others say overnight fees should not be imposed on equestrian users at all, for the reasons cited above.

Uses for the Proposed Fees: We believe that any funds raised by Wilderness-access fees should be expended on:

- * Trail maintenance -- to continue to provide recreational access within the Wilderness with an emphasis on addressing the maintenance backlog.
- * Enforcement -- to ensure a high level of compliance with permit requirements and Leave No Trace ethics with the ultimate goal of reducing impact.
- * Stewardship education -- so people who access the Wilderness understand the importance of minimizing their impact on natural resources and have the skills to do so.
- * Social media messaging -- to educate the public on Leave No Trace ethics, promote volunteerism, and showcase and promote lesser-used trails in areas that can sustain increased use.

Cancellation Policies: Many of our members are concerned about the possibility that other users will snap up Wilderness permits as soon as they become available and then at the last minute cancel those they don't intend to use. At the same time, our members want cancelled permits to be made available to other users. We believe a reasonable approach would be to allow full refunds of the Forest Service's share of the cost of a permit for cancellations until two weeks before the permit date. After that, the fee would be non-refundable.

We also think permits should be fully refundable (including the recreation.gov fee) if the road to the trailhead is impassible, if the trail has not been cleared or is otherwise impassible, or if the trail is closed because of fire or other reasons. Likewise, if a user arrives at the trailhead and is unable to find a place to park (a genuine concern for equestrians driving horse trailers), they should be entitled to a full refund of the permit fee.

Annual Passes: We see several problems associated with offering a yearly pass that entitles the buyer to purchase as many limited-access permits as they want for one flat fee. First, it would encourage hoarding of permits. Second, the buyer is essentially making a bet that they will be able to obtain limited access permits for enough days to offset the cost of the annual pass. If they can't get the permits they want, they've wasted their money on the annual pass. Given these issues, we don't believe a yearly pass program makes sense at this time.

Advance Reservations vs. Spontaneous Permits: Because overnight trips typically require advance planning, we would like to see a high percentage of overnight passes available in advance. For instance, 70% of overnight permits could be available six months in advance, with another 15% available two weeks prior and the remainder available the day prior.

Likewise, a high percentage of day-use permits should be available for spontaneous use. For instance, 40% of day-use permits could be reservable up to 6 months in advance, 30% two weeks prior, and 30% the day prior.

We encourage your use of adaptive management to monitor reservation patterns over time, so these percentages can be fine-tuned as usage trends warrant.

Permits to Reward Volunteers: OET would like to see volunteer work rewarded with increased access to

Wilderness areas. Our rationale is that an individual who donates 30 hours of basic volunteer time during a year provides services to the Forest Service worth \$740.70 at 2018 rates, not including the value of their donated mileage and gas. An individual who donates 30 hours of skilled volunteer time during a year provides services worth \$1,111.20, not including the value of their donated mileage, gas, and equipment use.

In recognition of the value of their services, we would like to see individuals who donate 30 hours or more rewarded with a free Wilderness-access pass for the following year. That is, their Wilderness-access pass would entitle them to Wilderness access at any time, with no fee, for the next calendar year. Our rationale is that if a volunteer purchased a day-use permit for every other day of the roughly 4-month Wilderness season (a highly unlikely scenario), the monetary value of their Wilderness permits would be less than \$240—far less than the value of the volunteer services they provided.) The Forest Service gets a bargain by rewarding volunteer time with Wilderness access while demonstrating that the efforts of active volunteers are valued and appreciated.

The number of such Wilderness-access passes awarded for the following year could be offset by a proportional reduction in the number of paid Wilderness permits available that year, to ensure that overall trail usage remains within acceptable limits across the Wilderness area.

As an incentive to get more people to volunteer, we also suggest offering a packet of free Wilderness permits (that is, permits are still required, but the fee is waived) for volunteers who donate 8 or 16 hours of work. The number of free permits offered should be roughly equivalent to the value of a Northwest Forest Pass (that is, \$30 for 16 hours or \$15 for 8 hours) and could be offered instead of a Northwest Forest Pass if the volunteer prefers.

OET and Back Country Horsemen: Our fellow equestrians at Back Country Horsemen of Oregon (BCHO) have been working with the Forest Service to try to preserve horse packers' access to the Wilderness trails that enable them to enjoy their sport. On several occasions, Forest Service personnel have challenged the validity of BCHO representatives' concerns about overnight Wilderness-access restrictions by telling them, "OET is fine with it."

We urge FS staffers to recognize the differences in the membership of these two organizations. Most OET members are day riders who access Wilderness trails primarily from established horse camps. Very few OET members pack, and those who do are often also members of BCHO. BCHO members are highly focused on back-country trails, and a sizeable percentage of BCHO members lead pack strings. While members of both OET and BCHO ride stock, their respective concerns about Wilderness access are as different as those of day hikers and PCT through-hikers.

We don't appreciate the comments from Forest Service staffers who question the validity of BCHO's concerns about overnight Wilderness access for packers by pointing out that OET's day riders don't share those concerns. We doubt that those staffers would discount the Pacific Crest Trail Association's efforts to ensure Wilderness access for PCT through-hikers by pointing out that the Forest Service has received hundreds of comments from day-hikers who aren't concerned about through-hiking issues. We'd like to see the same courtesy extended to our associates at Back Country Horsemen as they work to preserve packers' overnight access to Wilderness areas.

It seems reasonable that since the Forest Service has developed special Wilderness-access rules for hunters, PCT through-hikers, and outfitters, some accommodations could be found for the tiny percentage of trail users who utilize pack stock.

We have been told by Forest Service staff that the volunteer packing support they receive is very important to the Forest Service and its trail volunteers. If Wilderness-access limitations spread to other forests, as many people predict, packing activity will become correspondingly limited. If packers find themselves unable to engage in their sport for recreation, they'll have no incentive to maintain their pack strings or teach their skills to future stock users. After all, pack animals require consistent training and conditioning and cannot sit in the garage like a chain

saw or ATV. This very small subset of equestrians has skills that take years to hone, their equipment and mules are a big financial commitment, and their volunteer work in the Wilderness cannot be replaced by hikers or ATVs. We would hate to see the Forest Service lose this vital source of trail maintenance support because of packers' restricted recreational access to Wilderness. We believe it's in the Forest Service's best interest to work out a way to facilitate packers' recreational access to Wilderness trails.

Summary:

1. OET's comments on the proposed fees for day and overnight Wilderness access reflect our members' diverse opinions. We were unable to reach a consensus on the appropriate levels for these fees.
2. OET members would like to see any fees generated by Limited Access Permits spent on trail maintenance, enforcement, stewardship education, and the use of social media to promote Leave No Trace ethics and volunteerism, and to showcase lesser-used trails.
3. OET would like to see a cancellation policy that provides a full refund of the Forest Service's share of the permit fee until two weeks before the date of the permit, with no refunds after that. Permits should be fully refunded if the road to the trailhead is impassible, the trail has not been cleared or is otherwise impassible, the trail is closed for fire or other reasons, or if the user is unable to find a place to park.
4. OET does not believe annual passes are practical at this time.
5. OET would like to see 70% of overnight permits and 40% of day-use permits be reservable up to 6 months in advance, another 15% of overnight permits and 30% of day-use permits become available two weeks prior, and the remainder become available the day prior.
6. OET members would like to see volunteers who accumulate 30 or more hours in a year rewarded with a free Wilderness-access pass the following year, with such passes providing Wilderness access any time, at no fee. If necessary, the number of paid Limited-Access Permits available through recreation.gov could be reduced to offset the Access Passes offered to high-performing volunteers. OET would also like to see volunteers with 8 or 16 hours of service rewarded with waived fees on Wilderness permits equivalent to \$15 or \$30, respectively (the value of a Northwest Forest Pass.)

We appreciate your consideration of our comments and hope you will contact us if you have questions or need clarification.

Oregon Equestrian Trails