January 2, 2020

To Whom It May Concern:

As a western Oregon resident and regular central Oregon Cascade recreationalist, I have a keen interest in the proposed wilderness permit system. I have had opportunities to witness some of the concerns that the permit system endeavors to address, such as the degradation of fragile areas due to off-trail trampling and human waste, as well as crowding in certain areas. Although these issues have reached problematic levels at certain select sites (Green Lakes; Tam McArthur Rim, perhaps Canyon Creek Meadows, etc.) within the three wilderness areas the permit system would be implemented in, I do wonder whether it is necessary to implement the proposed permit and fee revisions across the wilderness (recognizing that not all trails will be subject to changes for day-hiking activities)? Additionally, though the crowding at these certain sites on select summer weekends likely diminishes the experience for some hikers, I would venture that those who report crowding as a problem are perhaps exaggerating the disutility it has caused them. In many cases, hikers tend to be more concerned with crowding in the abstract, but its actual negative effect on their experience tends to be minimal.

Because the focus of this comment elicitation is not the permit system itself but rather the associated fees, the remainder of my comments will focus on them. However, I do wonder if the aforementioned problems could be addressed by expanding quota regulations currently in place at locations like Obsidian Trail to other sites of greatest concern, such as Tam McArthur Rim? That way, an adaptive management approach could be taken, if necessary, and more areas could be included in the permit system overtime, particularly as recreationalists’ visitation activities become altered as a result of the new regulations affecting certain areas. Though such an approach might have greater transaction costs, I believe site-focused regulations would be more effective at addressing outstanding issues, as well as being better received and more easily justifiable.

My primary concern with the fees associated with the new permit system is the financial burden it places recreationalists. The proposed fees, particularly the per night, per person fee for overnight trips, seem excessive. I think a single fee for each party, irrespective of length of stay, is much more reasonable and would be readily accepted by the public. Thus, I suggest the overnight fee per party for any single trip, regardless of length, be $11. As for the day-hike fee, I would suggest that it also be assessed per party, rather than per person, resulting in a day-hike fee of $4 for an entire group.

I also wonder if the goal of the fee is to derive revenue to shore up budget shortfalls, or create a Pigouvian fee to reduce demand and visitation to areas, or both? These distinct goals perhaps necessitate different fee levels, so it would be useful if the Forest Service could provide greater clarification regarding this. Additionally, from an economic standpoint, it is less efficient to charge the same fee during the summer weekdays, where usage (i.e., demand) is down, as summer weekends. So perhaps the fees could be applied only on Friday, Saturday, and Sunday, particularly if the fee’s goal is to disincentive visitation. Furthermore, it is likely that a significant portion of visitors who would have previously visited the fee areas will instead visit non-fee areas (e.g., Waldo Lake Wilderness), so I wonder if this has been accounted for in projections of necessary revenue for upkeep and maintenance vis-à-vis fee amounts?

It seems that the Forest Service’s plans recognize the uncertainty in implementing such a novel regime and thus it plans to take an iterative approach. I would suggest that erring on the side of under-regulating initially and potentially having to implement more/stricter rules in the future is a sounder approach, as compared to over-regulating at the outset. Most people who regularly use these wilderness areas recognize that there are issues requiring attention and some adjustment of the status quo; however, I think many individuals are likely to lose trust and become frustrated if they perceive that the solutions being proposed are not commensurate with the magnitude/scope of the problems they purport to address. My sense is that this is how many feel at this point, myself included.

Sincerely,

Ben Wickizer

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