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Comments: Central Cascades Wilderness Project

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Dear Willamette National Forest,

Recreation within Deschutes and Willamette National Forests' Wilderness areas has a positive impact on local Oregon communities. Many citizens choose to reside in places like Bend for the accompanying quality of life and the health benefits of outdoor recreation, including climbing, hiking, backcountry skiing, trail running, and other human-powered Wilderness-based activities. Burdensome and limited-entry permit systems could have an unintended economic impact on rural communities, local businesses, and the greater Oregon tourism economy.

The new quota-based fee structure for limited-entry day-use permits and overnight users, would restrict climbing access and create more barriers for low-income communities. A portion of permits should be held for walk-up, first come first serve availability to allow climbers to attempt summits during good weather windows, which decreases potential weather-related accidents and the chances of getting lost, both of which result in increased search and rescue missions within Wilderness areas.

The Forest Service should implement other, less restrictive management tools prior to implementing limited-entry day-use permits. Examples include educational programs focused on leave no trace practices, administrative signage, revegetation and restoration projects to address areas of concern, and installation of toilet facilities and/or wag bag stations to address human waste issues.

Based on modern recreation ecology studies and Wilderness Management Policy-2323.12, the Forest Service should implement First Level Action-Public Information and Site Restoration and Second Level Action-Use of Regulations prior to imposing such rigorous Third Level Action-Restrict Number of Users. We propose implementing First and Second Level actions for day-use and overnight areas and trails to further assist in managing impacts to these Wilderness areas. We strongly support management practices, Forest Service Manual 2300- Recreation, Wilderness, and Related Resource Management Chapter 2320 which allow responsible recreation to co-exist sustainably with natural resource preservation, without imposing undue burden on the general public. We suggest the following First and Second Level actions be taken:

First Level Action- Public Information and Site Restoration:

- ? De-emphasize attraction of excessively used areas and promote use of alternative areas
- ? Inform the public of optimum user practices through public service media messages, portal notices, and personal contact. Emphasize 'no-trace camping'
- ? Adjust and add administrative and informational signing
- ? Revegetate damaged areas and post site restoration messages

Second Level Action-Use of Regulations:

- ? Limit or ban campfires
- ? Designate campsites

- ? Require minimum spacing between campsites
- ? Impose a minimum setback from water and trails for campsites
- ? Restrict types of use in a specific area or on trails leading to an affected area
- ? Limit length of stay
- ? Close re-vegetated campsites
- ? Install toilet facilities or install wag bag dispensers and require human waste removal to correct major sanitation problems
- ? Restrict group size

By implementing the above First and Second Level actions, impacts to resources will be reduced as areas are managed appropriately for their use level. In reviewing the overnight use data provided in the EA, it is evident that the majority of resource impacts and management concerns are a result of overnight use exceeding the carrying capacity in these Wilderness areas.

b. Indirect Wilderness management tools not implemented

The Forest Service Policy for Wilderness Management (Wilderness Management Tools Forest Service Manual 2300- Recreation, Wilderness, and Related Resource Management Chapter 2320-Wilderness Management) states under 2323.12-Policy:

1. Maximize visitor freedom within the Wilderness. Minimize direct controls and restrictions. Apply controls only when they are essential for protection of the wilderness resource and after indirect measures have failed.
2. Use information, interpretation, and education as the primary tools for management of wilderness visitors.
3. Manage for recreation activities that are dependent on the wilderness environment so that a minimum of adaptations within wilderness are necessary to accommodate recreation.

I object to the implementation of limited entry day use fee permits based on the understanding that the Forest Service has not implemented other indirect Wilderness Management Tools as listed above. Additional education and indirect and direct management tools should be implemented prior to day-use permit enforcement.

Recommendations

- ? Manage day use by size of parking lot and other indirect measures, but only require day use permits, quotas and fees in exceptional circumstances. The Forest Service should continue to pursue partnerships with County and State officials to address parking issues and enforcement at trailheads. Managing and enforcing parking would self-limit the number of people on trail systems.
- ? Require permits and quotas for overnight use. In low use areas with concern for dispersal, camping zones are used that permit dispersed camping. When use is concentrated at popular destinations, designated campsites should be implemented. These campsites should be reserved by the specific campsite so that the user knows exactly where they are expected to camp. This reduces competition among users for prime campsites and eliminates proliferation of campsites. Reservation fees are common and lottery systems would be implemented for these sites. Overnight permits would double as parking passes, with spaces reserved for overnight users. The length of stay at designated campsites would be lowered to 3-4 days to allow more users to enjoy the most spectacular parts of their wilderness.
- ? Maintain, reroute, and construct trails at a high standard to prevent resource impacts despite high levels of use.
- ? Physically close and restore unwanted social trails and campsites with a combination of user fees and a corresponding increased agency budget.

Additionally, the Forest Service should consider an annual pass or volunteer pass to remove undue limitations and financial burden for individuals who frequent the permitted areas and support stewardship.

Sincerely,
Richard Ellison, M.S. Botany

