Data Submitted (UTC 11): 11/25/2019 5:10:08 PM
First name: Mark
Last name: Scott
Organization:
Title:
Comments: Special Recreation Permit Fee

I am not in favor the the Special Recreation Permit Fee for backpacking in low use areas. These low use area are an important part of the wilderness spectrum but, The proposed fee structure is being applied to 100% of the Jefferson and Sisters Wilderness yet 33% of the trails had zero average overnight use and never exceed your quota levels (see CCWS Final EA). Many of these trails had low probability of displacement (see CCWS Final EA) . The cost of managing, processing, and meaningful enforcement of these low use trails, which would only produce less than one percent of your revenues does not make any financial sense. Some cost/benefit analysis is needed. I would encourage that you allow these low use overnight areas be exempt from the Special Recreation Permit Fee and allow free self issued permits at the trailhead. You have the flexibility in your adaptive management plan to adjust this if it does become an issue of displacement. Having a burdensome quota system of low use trails does not build public confidence in the agency's ability to convert recreation fee revenue efficiently into meaningful accomplishments when less than 1% of your revenues come from 1/3 of the trailheads.

Specific trailheads I am referring to for this data are: Crown Lake, Roaring Creek, Bingham Ridge, Bear Valley, Scott Pass, Millican, Corral Lake, Corral Swamp, Deer Lake, Many Lakes, Taylor Burn, Helen Lake, Jack Pine, Box Canyon, Crossing Way, Lower East Fork, Upper East Fork, Elk Creek, South Fork, Rebel, Horse Creek, Rainbow Falls, Pat Saddle, Upper Lowden, Black Crater, Minto Mountain, and Chush Falls. These 27 tailheads represent 33% of your total trailheads. Based on your 2016 CCWS Final EA these trailhaeads had a total of 234 overnight visits (out of the total of 12,8147 overnight visits for both wilderness) or less 2% of your overnight use. I estimate that this would be less than 1% of your revenues (since your day use number are a greater percentage of the revenue volume). I might add that Black Crater, Minto Mountain, and Chush Falls are all stand alone trails that do not interconnect to any other trails. It doesn't make sense to collect fees and administer low use overnight areas.

This overnight fee structure will be a burden to low income families and households. For instance a family of 5 (above the age of 12) would cost $81 for a three day backpack. This will exclude low income families from the wilderness. It has been suggested that passes be set up for library for low income use. This just adds another layer of complexity for both the National Forest and the user. Further, this restrict spontaneity (i.e. is the library open? are passes available?) for the user. But, by allowing overnight low use trailhead for a free self issued permits, this freedom of spontaneity would open a section of the Wilderness to low income families, provide social justice and allow better use of the National Forest resources. I would encourage your consideration of removing fees from low use areas.

I am in support of the No special use permit fees for youth 12 and under but, I believe the age limit should be 16. This would be less of a burden to family and put you more inline with USC02 16 USC Ch.87 Federal Land Recreation Act 6802 (d)(3) prohibiting any fee for "any person under 16 years of age".

I would like to see consideration given to capping the proposed $5 per-person-per-night fee after a small number of nights. This would keep the fee more approachable for families and households.

The processing fee has discriminatory bias against overnight use. When considering your CCWS Final EA data I noted that in 2016 there was 105,867 total day use and 12,814 total overnight use (only 11% of the useage was overnight). According to your quote of Cole in 2010 overnight use was 29%. This seem to suggest that in that 6 year period the greatest growth was in day use (and the greater resource damage). Yet the fee structure (and quotas i.e greenlakes quotas: day use 80, overnight 14) are bias against overnight use. The processing fee for overnight is $6 (for all 79 trailheads) and only $1 for day use (at 19 trailheads). I fail to understand why the processing fee of overnight or day use should be any different. The processing fee should be the same for either day use or overnight. I would encourage consideration of the processing fee be more equitable.

The processing fee should include your administrative cost. The processing fee may cover rec.gov fees but, Deschutes National Forest and Willamette National Forest will have additional cost associated with staffing, staff training, walk in processing, public inquires, data collection, web site administration, over site, cancellation and refunds. This all needs to be covered and makes more sense to be part of the processing fee. The administration of the CCWS should be transparent and not borrowed from the general fund.

Trail Maintenance should be a number one priority for fee investment. Since the CCWS was designed to "reduce recreation-related impacts to the wilderness resource" it its imperative to provide maintenance to reduce resource damage from numerous braided trails, rehabilitating the duplicate unauthorized trails and providing proper sustainable maintenance. Existing unauthorized trails need to be acknowledge such as the Sister Climbing trail, No Name Lake, and the Canyon Creek Glacier trail. Furthermore, with a fee, yearly maintenance is expected on the trails by the public. I believe a fee structure is going to dissuade volunteers (i.e. people don't volunteer at banks), thus impacting a major contributor to the maintenance of the trails that will need to be taken on by the National Forest trail crews. Trails that have been abandoned due to lack of maintenance should be re-established. Specifically, Brush Creek #4004 and Minto Lake Trail #4006. These are vital, historic, scenic trails on the east side that reopening would help distribute the impact of disbursement due to the CCWS. The majority of the fees collected should be invested in trail maintenance.
I would be in support of minimal fee usage for education. I see no direct benefit from education.
I would be in support of keeping management activities to a minimum. It is hard to see any direct benefit to the public. Please, keep this to a minimum.
Thank you for this opportunity to comment.
Sincerely,

Mark Scott
541-678-2666

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