Data Submitted (UTC 11): 1/2/2020 6:37:56 PM First name: Jim Last name: Henson Organization: Title: Comments: Central Oregon Cascades Rec Fee Comment

## Comment on proposal: "Special Recreation Permit Fee Management Plan - October 2019"

I have encountered the USFS limited entry system 4 times and had a bad experience each time when using Recreation.gov. I strongly suggest that the limited entry program NOT use Recreation.gov and only use trailhead and FS Office staff for issuing permits. I strongly believe that people or business are snatching up a large portion of the available reservations early in the time period and then not using the permits or perhaps attempting to resell the permits.

I also comment that the quota counts posted in Appendix A of "Special Recreation Permit Fee Management Plan - October 2019" are horribly low. Most groups are groups of 2, yet the current site counts a group as up to 8. I would like to see real data of car counts and headcounts on the trail before accepting quota numbers. How many people really show up? How many feet really pound the trail? Look at Linton Lake in Appendix A.: 2 overnight allowed. Do you really mean that in the 100-day season, 200 groups of 8 or 1600 overnight stays? If 'yes', then reformat the numbers and issue these permits per-person, and allow 533 per month, not counted on a daily basis. Rain days, and storm days will get no users (but those permits were probably taken), but a limit of 2 on a fine weekend in August will mean that practically no one will get to go.

My experience is with the Three-Sisters Obsidian trailhead for the purpose for summiting North Sister and Pamelia Lake the for the purpose of summiting Mt. Jefferson. In both cases there were only 2 permit types offered, Day-use within the LE area and Overnight within the LE area. In my case I just want to walk across the LE area, not play in the water and not camp overnight, yet my trip is a 3-day venture. For 4 trips in 4 years, my attempts to get an overnight permit for a predicted good-weather summit only succeeded once. On two tries I secured day-use permits for the day-in and day-out transit, and on the last attempt I last attempt there were no permits for any possible day available for either Day or Overnight use, so I had to enter at an unrestricted trailhead and hike 2 miles further one-way on the un-restricted PCT. And then on that last trip, we saw only PCT hikers. No other overnight users were seen in the LE areas we crossed.

And another comment is the horrible arrangement of the Pamelia Lake permit system: there are 3 distinct use areas, yet only one permit that encompasses all three areas. It is clear if you walk in there that the only high use area is the Pamelia Lake 1 mile from the parking area, used by soccer-moms, and the 2 other areas several miles out are empty of people because they cannot get an Overnight or even a Day permit! This is just a lazy implementation of the permit concept and it cheats us users of legitimate access.

Essentially, if you criminalize hiking in the forest you will make all the people who most appreciate the forest into criminals. J A Henson

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p.s. My son is an adult and a hiker and an Eagle Scout and he opposes added L.E. areas also. No on new restrictions. Mange the population by limiting the parking.
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