Data Submitted (UTC 11): 11/5/2019 1:27:39 AM
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Organization:
Title:
Comments: Deschutes Permits and Fees

Hello my name is Adam Coberley. I am an admin in the group Oregon Hikers and Climbers. We are 7000 strong and growing.
This summer I had the opportunity to hike with 6 groups of people up South and Middle Sister. I was able to get my 73 year old father in law who is living with cancer to the top, and I witnessed over 30 people get their first Cascade Summits. This truly is a beautiful area. I know it very well. I have looped The Sisters Wilderness on an extended 100 mile loop as well.

Oregon Hikers and Climbers is against the proposed fees and our members feel like you are in violation of FLREA, you are putting the public in danger, and you are closing several areas that are not impacted by overuse.

First off I do want to point to 2 sections of the FLREA the very act that you think that gives you authority to limit entry to our lands and charge us for using them. I want you to understand why people think that you do not have legal grounds. I want to draw attention to this section of the act. I hope to encourage individuals to contact congress, and I hope to encourage people to band together and bring about legal action.
Under section (d) Limitations on recreation fees
(1) Prohibition on fees for certain activities or servicesThe Secretaryshall not charge any standard amenity recreation fee or expanded amenity recreation fee for Federal recreational lands and watersadministered by the Bureau of Land Management, the Forest Service, or the Bureau of Reclamation under this chapter for any of the following:
(A)
Solely for parking, undesignated parking, or picnicking along roads or trailsides.
(B)
For general access unless specifically authorized under this section.
(C)
For dispersed areas with low or no investment unless specifically authorized under this section.
(D) **THIS IS THE KICKER**
For persons who are driving through, walking through, boating through, horseback riding through, or hiking through Federal recreational lands and waters without using the facilities and services.
(E)

For camping at undeveloped sites that do not provide a minimum number of facilities and services as described in subsection (g)(2)(A).
With that in mind: Does hiking and camping in undeveloped Wilderness really sound like what the below is talking about or what you think Congress had in mind when passing FLREA? We do not think so..

16 U.S.C. 6802(h)
"(h)Special recreation permit fee
The Secretary may issue a special recreation permit, and charge a special recreation permit fee in connection with the issuance of the permit, for specialized recreation uses of Federal recreational lands and waters, such as group activities, recreation events, motorized recreational vehicle use."

That being said, I have reached out to the group to ask for constructive information, as we know you are currently going through with the process and this is the time to comment on fees.
We have focused on three main points. How to issue, fees being charged, and the scope of the permit area:

HOW TO ISSUE PERMITS
Comments:
Not everyone wants or is able to plan day hikes months in advance. Saving some for the week of or the day of would help those in the service industry that do not know their schedules weeks in advance.
You are encouraging people to climb some pretty dangerous mountains on the date of their permit instead of allowing them the flexibility of watching weather patterns. This is dangerous!
How do we keep computerized bots from buying up tickets and causing a secondary market and even more fees?
As a local I don't plan trips a season.. Months.. Or weeks in advanced. Usually it's the week of.
Suggested Solutions
Have some spots that can only be reserved 3 or so days before the hike date/Multiple release dates throughout the season.
How about a season pass for locals, or an exemption for locals. You are making people that moved to Bend for recreation purposes drive long distances now to get a hike in if they don't get the permit they need.

FEE AMOUNT:
Overnight permits should be $5 per GROUP per night, not per person. The permits are for groups so why are the fees not? If you're going to charge per person then make the overnight permits per person and bump up the quota.
You are pricing your fees at a level that should be per group instead of per person, Keep it similar to the OLEA (Obsidian Area)
We already pay taxes for our public lands. Why not address the fees at that level and have a high fine that will help pay for fees and will discourage people from trying to get around the permit process.

PERMIT AREA
The area that is being permitted is too large. OHC members have marked the following areas as places where high use occurs. The rest seems like too much:
Limited Entry: South/Green Lakes/Broken Top/Matthieu Lakes Trail
For 3 Sisters.

Jefferson Park/Duffy/Canyon Creek/Carl Lake for Mt. Jefferson

Nothing for Mt. Washington wilderness.

This would have limited impact on the hard hit areas, distribute people on less popular and lesser used trails, and give you a much easier land mass to enforce the new regulations on.

I would like to leave you thinking about something that an OHC member posted. It is well composed and it does let you know what the general public thinks about this process.

Is this really implementing the permit process to limit use or is it a fund raiser? I can appreciate their thoughts about this but have always
thought of public land as…public. Part of my income or tax has already been reserved for public lands.
Why the double fee? I also pay a tax for the fire department, but if I need to use them, I don't have to pay again. I would rather just pay a higher tax at tax time if more funds are needed. Also, I can afford the fee, but what about individuals or families that can't? The Forest Service states that they are working with Nonprofits to ensure families aren't priced out from using public land. I am not sure how this will work.
The biggest issue I have isn't really with the fee, but it ruins the spontaneity of just deciding to go hiking in one of the permitted areas. I usually carry my gear with me and at times just turn left and head for

the hills. Now I will need to visit the website, check for availability, and then decide where to go. (The decision where not to go might have already been made for me.) The spontaneity might work itself out in the infancy of the permit process.
If it works how the Forest Service envisions, then the daily use will decrease for the permitted trails. I question if pressure will increase on other trails and subsequently be fee based in the future as well.
I think this is the first step to make all Trail Heads Fee Based.
Frank Nelson
Avid backpacker
Member - Facebook Group - Oregon Hikers and Climbers

Feel free to contact me through this email address.

-Adam

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