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Comments: Comments-Wilderness Fees

My comments are attached.

November, 23, 2019

Wilderness Recreation Fees,

In high school I dreamed of landing the perfect summer job--a position with the Forest Service on a wilderness trail crew. I have long admired and respected the Forest Service but the Cascade Wilderness Strategies Project has solely tested my support for the Agency. If the Forest Service is to regain/retain public the trust and respect it must seriously reconsider the way it does business. Merely as examples I offer the following three points.

I hold the Agency, responsible for protecting the public lands I love, to a higher standard than demonstrated in the Wilderness Strategies process. The very proposal, a fee-based limited-entry permit system across five wilderness areas, was poorly supported and a dramatic overreach. To roll out this proposal while withholding information about the proposed fee side of the equation gave the process a duplicitous and manipulative feel.

The Agency's stated rational for implementing a fee-based permit system, to address issues mandated in the Wilderness Act--particularly solitude--felt disingenuous. Why would an Agency committed to detailed compliance with the Wilderness Act also spend years pursuing a proposal to designed to artificially alter the natural ecosystems in the Mount Washington Wilderness through the use of prescribed burns supported by unlimited helicopter use.

The Deschutes National Forest collects nearly 1.5 million dollars annually from Northwest Forest Pass receipts yet, as repeatedly stated during recent public meetings, it is unable to support a single wilderness trail crew. What message does this send the public about the Forest's true wilderness management priorities?

The Fee Proposal is Deficient

The Agency's proposal to assess wilderness access fees is a cursory and incomplete one-and-a-half-page document that fails to provide the public with sufficient information to assess impacts and submit meaningful comments. It is deficient in many aspects including:

- * It offers no information about the fee's impact on families, low-income, minority, or marginal populations.

- * The proposal to offer wilderness library passes to certain populations of users is lacking in detail and offers no assurance that this approach will assure that fees and permits do not disenfranchise large blocks of the

community.

- * It does not contain a needs statement and fails to provide a rational for assessment of user fees.

- * It does not assure equality among users and allows hunters unrestricted free access to the resource at the expense of the general public.

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- * It fails to clarify permit requirements and proposes a confusing and unclear situation where different fees and different permits will be required at different trailheads.

- * It fails to provide a clear proposal for the issuance of passes or permits to volunteers that defines how such passes may be earned and exactly when and how they may be used.

- * It does not offer a clear and concise image of how cancellations and no-shows will be addressed and does not explain how/when permits will be released to the public.

- * It provides no assurance that fee revenue will not be used to obligate annually appropriated funds now dedicated to wilderness to other departments/uses.

- * The Willamette National Forest has a 30-million-dollar budget. I have been told that wilderness access fees will generate approximately two hundred thousand dollars annually. Administrative costs, along with the cost of collection and enforcement, will eat up a huge percentage of this revenue while creating a huge public relations nightmare. The proposal fails to make a case to the public why the relatively small amount to be collected is of such importance to the Forest.

- * The proposal fails to offer the public budget information about exactly how proposed fees will be used--in fact, it asks the public how the money should be used. The Forest should have the answer to that question before proposing new fees. Without an overriding need, addressed budgetarily and explained succinctly, it should not consider charging a new fee!

- * The fee proposal indicates that a day-hike will incur a three-dollar user fee and rec.gov will charge one dollar for issuing a permit--that is a whopping 33% service fee by rec.gov! An overnight trip for two will cost incur a ten-dollar user fee but rec.gov will charge six dollars for issuing the permit--an incredible 60% service fee! The proposal does not defend the amount of these fees and fails to share with the public exactly how these exorbitant fees were determined.

- * The proposal fails to provide information about what fees might cost the average wilderness user on an annual basis. Personally, I did six-day hikes on the Deschutes National Forest last year. Under the new fee schedule the cost for two of us would be \$36 in user fees plus the rec.gov \$12 service fee. We also did four overnight trips totaling eight nights of camping. Cost for two, with the new fees; \$80 in user fees plus \$18 to

rec.gov. The total, \$146 annually. Add in the \$30 annual cost for a Northwest Forest Pass and you get a whopping \$1760 in fees over the next ten years! That is far too much!

* The proposal fails to demonstrate compliance with The Federal Lands Recreation Enhancement Act (FLREA) criteria for the assessment of user fees.

(1) The amount of the recreation fee shall be commensurate with the benefits and services provided to the visitor.

(2) The Secretary shall consider the aggregate effect of recreation fees on recreation users and recreation service providers.

(3) The Secretary shall consider comparable fees charged elsewhere and by other public agencies and by nearby private sector operators.

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(4) The Secretary shall consider the public policy or management objectives served by the recreation fee.

(5) The Secretary shall obtain input from the appropriate Recreation Resource Advisory Committee, as provided in section 6803(d) of this title.

(6) The Secretary shall consider such other factors or criteria as determined appropriate by the Secretary

Fee Proposal Should not be Implemented

The scale and scope of this proposal--permits and fees for the public's use of 450,000 acres of public land--is far beyond the scope of congressional intent as defined in FLREA. I do not support the implementation of this proposal to assess additional user fees for wilderness management purposes for the following reasons:

* Budget appropriations is a congressional authority not that of a local forest. Annual appropriations must be managed to achieve effective forest management.

* Administrative, enforcement and collection costs associated with a fee program must be balanced against benefits.

* Amounts paid to rec.gov are excessive and unacceptable.

* Failure to provide a clear statement of overwhelming need and a budget detailing how revenues will be used is unacceptable.

* All users need to be treated equally. Plans to allow hunters permit-free, fee-free access while charging others is unacceptable.

* Wilderness impacts associated with horses and dogs must be recognized and addressed in any permit/fee proposal.

* Agency must demonstrate compliance with FLREA.

* Fees need to go 100% to on-the-ground actions with an emphasis on erosion control and trail maintenance. Administration, office staffing, and enforcement must continue to be supported by appropriated dollars.

* Targeting any one particular Forest user group, such as wilderness users, for assessment of additional fees to supplement congressional appropriations is unacceptable.

A Suggestion

One approach to generate additional wilderness funding might be to work with other forests to increase the cost of the Northwest Forest Pass by five dollars and dedicate this increase to wilderness management. Much more

user friendly than the proposed fee system this concept might well meet with general acceptance if presented as an alternative to a plethora of wilderness access fees being implemented by Forests across the region.

Thank you for your consideration of these comments.

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