

Wilderness Report

A non-profit organization dedicated to protecting wilderness values

May 20, 2018


Mr. John Allen,

I fully appreciate that the Forest Service has a rather impossible job—protecting our wilderness areas for future generations while allowing us to enjoy them today. The 202-page proposal for the Cascades Wilderness Strategies Project is an impressive document full of data, copious references to impressive research studies, and it must represent hundreds upon hundreds of hours of work by dedicated staff.

Do we Need a Limited-Entry Permit System?

I read the entire EA looking for thoughtful, new, creative, and innovative approaches to wilderness management. What I found was a plan that showed no indication Forest leadership seriously attempted to identify approaches that might eliminate or defer the need to implement a burdensome, restrictive and expensive limited-entry permit system.

- No Alternative proposes the creation new education programs; perhaps one similar to that used in Denali National Park where backcountry travelers must watch high quality videos about low-impact wilderness travel, or perhaps on-line information about no-trace backcountry travel linked to a test that, when completed, allows a free, self-issuing permit, to be printed.
- No Alternative proposes offering regular wilderness training events on minimum impact camping that award participants bonus points toward free, self-issuing wilderness permits.
- No Alternative proposes evolving the role of Backcountry Rangers from patrol and police duties to that of Wilderness Ambassadors encouraging hikers to drop their pack for an hour or two and join in helping build a water bar, eliminate a fire ring, or brush a trail.
- No Alternative evaluates growing Forest Service administrative costs and corresponding reductions in field budgets against growing user impacts. In other words, despite years of deferred backcountry maintenance, there is no consideration that a reallocation of resources might solve the problem without implementation of a limited-entry permit system.
- No Alternative examines impacts associated with different user groups i.e., hikers, climbers, skiers, hunters, fisherpeople, equestrians, large groups vs small groups, commercial groups vs public groups. Such a study could allow the development of targeted education materials and the allocation of permits based on the impacts and resource damage associated with each user group.



That the EA fails to seriously consider alternatives to a limited-entry permit system is a major shortcoming. And let's be clear. Permit systems are not user friendly. Competing for permits creates stress, eats up time, consumes energy, costs money and keeps people out.

Alternatives Offer No Alternative

The Alternatives detailed in the Cascade Wilderness Strategies EA fail to provide a reasonable range of options. The differences between the four Alternatives are minor and except for the No Action Alternative all include a restrictive limited-entry permit system for all overnight camping in the Three Sisters, Mount Jefferson and Mount Washington Wilderness areas and all include a ban on campfires

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above 5700 feet. The failure to consider options beyond a limited-entry permit system calls into doubt the credibility of the entire EA and leads one to assume a decision has already been made.

Failure to Demonstrate Need

As far as I have been able to determine, if any of the proposed alternatives (other than no-action) is adopted, it will create the biggest, most restrictive, and comprehensive limited-entry wilderness permit program in the country. This is a very big step; not a thing to be undertaken lightly. Indeed, users are impacting our wilderness areas however, the EA does not provide the data needed to support creation of such a highly restrictive, all-encompassing, landscape-wide permit system.


The EA notes that only 53 of 765 wilderness areas nationwide have a permit system—only about 7%—and only 19 of those have a limited-entry system. Far from common, limited-entry systems are actually rather rare. Mount Hood Wilderness, located right next to Portland does not have one. Nor do any of the six wilderness areas within the National Forest closest to Seattle; the Mount Baker-Snoqualmie. The EA does not address the reason why a massive limited-entry permit system is required on these five wilderness areas while it is not required in other high use areas.

Prior to creation of such a restrictive system impact studies should categorize resource damage by type and identify techniques to mitigate each type. Firerings, sanitation, trail deterioration, user trails, vegetation damage? Once identified, many impacts might be addressed outside of a permit system. Unfortunately, the document does indicate such baseline data has been collected or evaluated. Without such baseline data, no version of a limited-entry permit system is justified.

Use Levels Undefined

The EA fails to justify proposed use levels significantly lower than use levels on many wilderness rivers, Mount Hood, Mount Adams or many other northwest wilderness areas.

A critical flaw in this plan is the failure of the Agency to examine the impacts stemming from years of deferred maintenance on wilderness trail systems. A study focused on categorizing impacts might well show that resource damage related to *deferred* trail maintenance is the single greatest resource issue. If true, the source of the problem becomes not visitor overuse but management's allocation of resources.



Plan documents indicate nine criteria were used for setting quotas e.g., parking lot size, historic use patterns, 2016 use levels, and professional judgement. However, criteria measuring damage from overuse is *not* included as one of the nine criteria. Failure to clearly demonstrate significant, quantitative, landscape-wide, user-impacts calls into question the need for a limited-entry permit system.

Any limited-entry permit system will have significant impacts on wilderness users. The public deserves to see the data justifying implementation of this program. The agency needs data to manage the program. Without it, no limited-entry permit system should be implemented.

Economic Impacts—Don't Ask

I was told that economic considerations related to the permit system—things like fees, budgets, personnel and such—are outside the scope of the EA and the public will have the opportunity to comment on those issues at a later date.

Frankly, the failure to reveal budget and fee information comes across as intentional and manipulative. The permit system on Idaho's Middle Fork of the Salmon generates tens of thousands of dollars in application fees alone—the public pays tens of thousands of dollars every year to enter a lottery most never win. Is that going to happen here? Is the generation of revenue the driving force behind this proposal? We just don't know.

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Being asked to comment on a permit system without knowing much it will cost and how it will work is rather like being asked to buy a house without going inside. I was told that the agency expects permit fees to not only support the permit system but trail crews, wilderness rangers and desk time for office staff. Based on traditional norms, permit fees will also be increased to support a percentage of payroll costs for everyone that remotely touches a wilderness program from the District Ranger to the Forest Supervisor.

How much will it all cost? Is a day hike going to cost \$5, \$10 or \$20 dollars? We just don't know because this information has not been shared with the public.

Northwest Forest Pass

This document fails to address how a new permit process will integrate with the Northwest Forest Pass. Will implementation of this permit system simply add another level of fees to those already being charged?

Inconsistent Treatment of Wilderness Values

The proposal also contains a bothersome number of inconsistencies that must be addressed in order to offer the public a coherent, consistent, and reasonable plan.

- The EA emphasizes the need to protect a visitor's wilderness experience and comply with the Wilderness Act. Then, it references plans to use helicopters to manipulate ecosystems in the Mount Washington Wilderness and continued use of helicopters to artificially alter the

ecosystems of backcountry lakes. Such use of mechanization and manipulation of wilderness ecosystems is not in keeping with the spirit and intent of the Wilderness Act.

- The EA eliminates traditional rules requiring backcountry travelers to camp at least 100 feet away from lakes and streams. This regulation has long been considered a valid way to disperse use and reduce impacts. Since the reduction of user impacts is the goal of this plan, elimination of this rule is a step backward.
- The plan purports to address issues related to overuse and crowding yet the proposal includes decommissioning 15.8 miles of trail? Decommissioning trails that cost \$20,000 a mile or more to build is counterproductive when overuse is driving creation of a fee-based limited-entry system.
- Wilderness values are not compatible with a maximum party size of twelve individuals. Large groups disturb solitude, have disproportionate impacts on campsites and are difficult for other parties to pass on the trail. Maximum party size should be reduced to no more than eight individuals.
- The EA stresses wilderness values and user impacts but fails to address the thorny issue of equestrian impacts. Every hiker and equestrian knows horses are hard on the trails and environment. A party of 12 horses and 12 people is too big a group for wilderness travel. Wilderness managers in other areas use the concept *beating hearts* to determine maximum party size.
- Any type of permit system should be fair and equitable. Allowing hunters unrestricted access to the wilderness while everyone else is subject to a limited-entry permit system lacks even the most basic level of fairness and equability. It is a completely prejudicial and preferential approach.


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Failure to Adequately Involve Wilderness Users

The Cascade Wilderness Strategies Project proposes significant and far-reaching changes to the way Oregon wilderness areas are managed. A management change of this magnitude should be accompanied by a significant public relations campaign that engages and informs the public. This was not the case. Last fall's series of public meetings, focused on placing colored dots on charts, failed to reveal the magnitude of the limited-entry permit system under consideration. The handful of public meetings this spring, accompanied by a publication of the Cascade Wilderness Strategies Project did little to fully inform the broader public about the scale and scope of this project.

It is highly likely that the majority of wilderness users remain unaware of the Cascade Wilderness Strategies Project and do not understand the extent of its impact on their ability to access wilderness.



The minimal 30-day comment period further assured that only the most informed and involved had the time to review the 200-page proposal and submit comments.

Permit Systems

In some instances, there is no alternative to implementing a permit system. However, Forest leadership is obligated to first try and exhaust all other options before burdening the public with an expensive, multi-forest, limited-entry, permit system? In this case, it is not clear that they have done so.

Choose No Action

Given the deficiencies of this plan, especially failure to document significant user impacts across the five wilderness areas impacted by this proposal, I urge adoption of the No Action Alternative until these issues are addressed.

Thank you for your consideration of these comments.

Art Pope

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Executive Director

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